

SRI label supported by the French authorities



Label guidelines

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The French version of the SRI Label guidelines remains the primary source of information.

Items highlighted in yellow show new features or changes compared to the November 2018 version of the guidelines.

I. - ELIGIBILITY CRITERIA

A) Movable asset management funds

Title	Requirements	Information required	Inspection points, inspection method, procedure for concluding whether a requirement or criterion has been met
I. Eligible funds	<p>The following funds are eligible:</p> <ul style="list-style-type: none"> i. Funds covered by the UCITS Directive; ii. Alternative investment funds (AIF) that do not have a substantial leverage effect as defined by the AIFM Directive and that are: <ul style="list-style-type: none"> - general investment funds (<i>Fonds d'Investissement à Vocation Générale</i> - FIVG) - specialised professional funds (<i>Fonds Professionnels Spécialisés</i> - FPS) - general professional funds (<i>Fonds Professionnels à Vocation Générale</i> - FPVG) - specialised financing vehicles (<i>Organismes de Financement Spécialisé</i> - OFS) <p>or</p> <ul style="list-style-type: none"> - employee savings funds 	KIID/ KID , Prospectus, Regulations	<p>Where applicable, check that the record/authorisation exists in the GECO database of the AMF</p> <p>The auditor checks that the fund is a UCITS covered by the UCITS IV Directive (2009/65/EC) or an Alternative Investment Fund (2011/61/EU) authorised for sale in France, a general investment fund covered by Article L. 214-24-24 of the French monetary and financial code (<i>Code Monétaire et Financier</i> - CMF) or a specialised professional fund covered by Article L. 214-154 of the French monetary and financial code or a general professional fund covered by Article L. 214-143 of the French monetary and financial code or a specialised financing vehicle covered by Article L. 214-166 of the French monetary and financial code or an employee savings fund covered by Article L. 214-163 of the French monetary and financial code.</p>
II. Label promotion body	Commit to becoming a member of the label promotion body	Written membership commitment.	<p>Check that the commitment exists.</p> <p>In the case of master-feeder funds, the membership commitment is not due from the master when the fund is not distributed (but</p>

			membership is still possible).
III. Special cases	<p>i. Corporate/sovereign mixed funds</p> <p>All types of "green" bonds fall within the scope of SRI assets concerned by the label: those issued by companies, regional authorities and by governmental or international public agencies.</p> <p>With the exception of green bonds, up to 70% of the portfolio may consist of debt and debt securities issued by governments that are subject to an ESG assessment and the securities comprising the remaining portfolio are also subject to an ESG assessment.</p> <p>In the event that government debt and debt securities have not been subject to an ESG assessment, then they may only represent a maximum of 50% of the portfolio and the securities comprising the remaining portfolio shall be subject to an ESG assessment.</p> <p>Other sovereign debts (supranational, local authorities, agencies, etc.) are not affected by these ratios and must therefore be systematically subject to an ESG assessment.</p> <p>ii. Funds of funds or multi-management funds</p> <p>Funds of funds must be at least 90% invested in funds that have the SRI label or a European label recognised as equivalent by the label owner.</p> <p>They must also demonstrate the consistency of the SRI approach applied to the various target funds</p>	<p>Portfolio statement and prospectus</p> <p>KIID/KID, Prospectus, Regulations</p>	<p>The auditor verifies the portfolio's composition in terms of the eligibility of the underlying funds.</p> <ul style="list-style-type: none"> - Verification that the funds invested in are in fact labelled. - Verification of compliance with the 90% ratio of SRI-labelled funds (excluding the cash portion held by the fund). <p>The auditor checks that this information is in the fund's regulatory documentation (KIID/KID, Prospectus, Regulations).</p> <p>When compliance with a quantitative standard is required and the applicant fund has not been operating long enough to demonstrate compliance with the standard, the criterion is deemed to have been met if the applicant fund undertakes, as part of the internal control procedures put in place by the management company to ensure the funds' compliance with the SRI guidelines, to comply with the standard and provides the auditor with evidence of compliance with these standards no later than 12 months after the label has been awarded. This evidence is to be sent to the accreditation bodies. This calculation may be carried at the same time as the eligibility verification if the fund has been operating long enough.</p> <p>"Green" bonds are defined in accordance with the</p>

	<p>invested in, in particular by ensuring that all of their assets, identified through transparency, comply with the measurability criteria set out in II A 3.1 (criteria relating to the share of issuer analysis and reduction of the investable ESG universe or a significant improvement in the weighted ESG rating compared to the initial investment universe).</p> <p>iii. Feeder funds Feeder funds are eligible for the label if the master fund is eligible for the label, subject to the feeder's management fees.</p> <p>French social impact assets (ie. "actifs solidaires") French social impact assets (ie. "actifs solidaires") may not exceed 10% of total assets when they are not subject to an ESG assessment.</p>		<p>criteria of the Green Bonds Principles of the International Capital Market Association (ICMA).</p> <p>To assess "long-term" compliance with a quantitative standard, the certifier or auditor examines the average of this standard over the fund's history during the 12 months preceding the application to award the label.</p>
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B) Real estate asset management funds

Title	Requirements	Information required	Inspection points, inspection method, procedure for concluding whether a requirement or criterion has been met
I. Eligible funds	<p>The following funds are eligible:</p> <p>i. Alternative Investment Funds (AIF) in real estate sold in France and Europe covered by the AIFM Directive or equivalent for funds sold outside the European Union;</p> <p>ii. Management mandates regarding real estate assets.</p> <p>Criteria related to asset composition:</p> <p>The funds' assets consist mainly of real estate assets held directly (properties) or indirectly (via property-based companies)</p>	<p>Contractual and regulatory fund documentation: Prospectus (OPCI), briefing note (SCPI), key information document or key investor information document (SCPI and OPCI/OPPCI), articles of association/declaration to the Trade and Companies Register (<i>Registre de Commerce et des Sociétés</i> - RCS) (AIF in real estate "by object"), management mandate agreement, etc.</p>	<p>Check that the record/authorisation exists in the GECO database of the French financial markets authority (<i>Autorité des Marchés Financiers</i> - AMF) for AIF in real estate "by nature" or the registration in the Trade and Companies Register (RCS) and the SIREN number in the INSEE database for AIF in real estate "by object". Check that the record/authorisation exists in the equivalent databases for funds sold in other countries.</p>

	<p>located in or outside France and in a single sector or of various types (office, retail, housing, etc.).</p> <p>In the case of OPCI funds, depending on the legal form of the fund (SPPICAV or FPI), at least 51% (SPPICAV) or 60% (FPI) of the funds' assets are made up of real estate assets held directly (properties) or indirectly (via property-based companies) and at least 5% of the funds' assets are cash (SPPICAV and FPI). The balance may consist of financial assets (equities, bonds, UCITS and/or FIVG, etc.).</p> <p>If the percentage of "other assets" is greater than 10%, the management company must:</p> <ul style="list-style-type: none"> - transparently disclose the percentage of the fund's assets (in value) covered by the real estate SRI label, - have put in place, as a minimum, for other asset classes, an approach that complies with the requirements set out in criterion 3.1 of the criteria for the labelling of movable asset management funds or invest in funds with the SRI label. 	<p>In the case of funds in formation: draft contractual and regulatory documentation</p>	<p>Check that the fund is indeed an AIF covered by the AIFM Directive authorised for sale in the European Union or equivalent for funds sold outside the European Union.</p> <p>Check that there is a civil law contract between the manager (the representative) and its client (the principal) in the context of management mandates.</p> <p>Check the fund's assets for existing funds or the fund's contractual and regulatory documentation (KIID/KID, Prospectus, Regulations, Information) for funds in formation to verify the eligibility of the assets.</p> <p>In the case of OPCI, if the percentage of "other assets" is greater than 10%, check that the information requested is indeed communicated in the regulatory and commercial documents to investors and distributors and that an approach that complies with the requirements of the securities SRI label has been put in place for other asset classes.</p>
<p>II. Label promotion body</p>	<p>Commit to becoming a member of the label promotion body</p>	<p>Written membership commitment.</p>	<p>Check that the commitment exists.</p> <p>In the case of master-feeder funds, the membership commitment is not due from the master when the fund is not distributed (but membership is still possible).</p>

<p>III. Special cases</p>	<p>i. Funds of funds or multi-management funds</p> <p>Funds of funds must be at least 90% invested in funds that have the SRI label or a European label recognised as equivalent by the label owner.</p> <p>If the percentage of "other assets" is greater than 10%, the management company must:</p> <ul style="list-style-type: none"> - transparently disclose the percentage of the fund's assets (in value) covered by the real estate SRI label, - have put in place, as a minimum, an approach that complies with the requirements of the securities SRI label for other asset classes <p>ii. Feeder funds</p> <p>Feeder funds are eligible for the label if the master fund is eligible for the label, subject to the feeder's management fees.</p>	<p>Portfolio statement indicating, for each fund, the name of the label obtained or applied for, and prospectus.</p>	<p>Check the composition of the portfolio in terms of the eligibility of the underlying funds, i.e.:</p> <ul style="list-style-type: none"> - the funds invested in are indeed labelled or have applied for a label, - the 90% ratio in value of SRI-labelled funds is respected. <p>When compliance with a quantitative standard is required and the applicant fund has not been operating long enough to demonstrate compliance with the standard, the criterion is deemed to have been met if the applicant fund undertakes, as part of the internal control procedures put in place by the management company to ensure the funds' compliance with the SRI guidelines, to comply with the standard and provides the auditor with evidence of compliance with these standards no later than 12 months after the label has been awarded. This calculation may be carried at the same time as the eligibility verification if the fund has been operating long enough.</p> <p>To assess "long-term" compliance with a quantitative standard, the certifier examines the arithmetic or geometric average, as the case may be, of the monthly averages of this standard during the 12 months preceding the application to award the label.</p>
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C) Management mandates

Title	Requirements	Information required	Inspection points, inspection method, procedure for concluding whether a requirement or criterion has been met
I. Eligible contracts	Discretionary management agreements as defined by Article L. 321-1 of the French monetary and financial code are eligible.	Portfolio statement and discretionary management agreement.	The auditor checks that the portfolio management service is a discretionary management service as defined by Article L. 321-1 of the French monetary and financial code.
II. Eligibility application	Eligibility applications are initiated by the principal itself, in the case of mandates concluded with professional clients as defined by Article D. 533-11 of the French monetary and financial code, in particular on behalf of institutional investors investing on their own account.		
III. Label promotion body	Commit to becoming a member of the label promotion body	Written membership commitment.	Check that the commitment exists. In the case of master-feeder funds, the membership commitment is not due from the master when the fund is not distributed (but membership is still possible).

II. - LABELLING CRITERIA

A. - Securities funds

Criterion No.	Criteria	Information required, standard to meet	Inspection points, inspection method, procedure for concluding whether a requirement or criterion has been met
Pillar I- The objectives targeted by the fund by taking ESG criteria into account for issuers			
1	Criterion 1- The general, financial and specific ESG objectives targeted by taking ESG criteria into account in the investment policy are clearly described in the regulatory and commercial documents intended for investors.	<p>The applicant provides regulatory documentation (KIID/KID, prospectus or regulations), commercial documents or commercial documents projects, and answers the following questions:</p> <p>(i) What are the general objectives targeted by taking ESG criteria into account in the investment policy, including, where applicable, the monitoring of issuers' ESG performance (see Pillar VI)? How are they defined and described to investors?</p> <p>(ii) Do you have objectives of a financial nature (medium-term outperformance, risk reduction, or profitability/risk trade-off, etc.) or other objectives (ethical, etc.) linked to taking ESG criteria into account? If so, what are they and how are they defined and described to investors?</p> <p>(iii) What are the...:</p> <ul style="list-style-type: none"> - environmental - social (human resources and human rights) - corporate governance <p>...objectives targeted by taking ESG criteria into account in the investment policy?</p> <p>How are these objectives defined and described to investors?</p>	<p>Check the completeness and quality of information provided by the applicant in respect of the documentation required and the questions asked.</p> <p>The auditor checks that the documentation addresses points (i) to (iii).</p> <p>An applicant fund that does not declare specific environmental, social and governance objectives (for example, those referred to in Pillar VI) does not meet this criterion.</p>

Pillar II- Issuer analysis and rating methodology used by the asset management company			
2.1	<p>Criterion 2.1- The ESG assessment methodology is clearly described and the fund management company demonstrates its ability to take these criteria into account in its investment policy.</p>	<p>The applicant fund's management company:</p> <ul style="list-style-type: none"> (i) Provides documentation available to investors that describes: <ul style="list-style-type: none"> - The ESG assessment method; - How the implementation of this method influences its investment policy; (ii) Provides a presentation of the ESG analysis tools and methods (proprietary tool with internal rating scale, external rating scale, reference to external ratings, frequency of rating review, etc.); (iii) Provides a presentation describing the strategy for selecting ESG assets and the method for transitioning from an ESG investment universe to an ESG portfolio (quantitative tools, discretionary, fundamental or technical analysis, consideration of rating changes, type of exclusions practised etc.). 	<p>Check the completeness and quality of the documentation provided by the applicant in respect of the documentation required and the questions asked.</p> <p>The auditor checks that the ESG assessment method is available to investors.</p> <p>The auditor checks that the methodology is reviewed at least annually.</p> <p>An applicant fund that declares an ESG assessment methodology that does not in actual fact result in the selection of ESG assets does not meet this criterion.</p>
2.2	<p>Criterion 2.2- The fund's management company puts in place reliable internal or external resources to conduct its analysis and demonstrates a real effort to analyse and understand the information it has at its disposal.</p>	<p>a) The applicant fund's management company provides the following information:</p> <ul style="list-style-type: none"> (i) List stating the external sources of information used in the ESG analysis (financial, extra-financial and ESG rating agencies, research from brokers, independent analysts, consultants, NGOs, database providers, etc.); (ii) Active contracts signed with these third parties at the time of the application date; (iii) Methodology for using external data. <p>(b) The applicant fund's management company provides available information on the human resources dedicated internally to the ESG analysis, in particular:</p> <ul style="list-style-type: none"> - Size and level of expertise of the ESG research and analysis teams (training, years of experience, etc.); - Training in ESG analysis (internally and externally with local players) and time spent by the management company on continuous training; 	<p>Check the completeness and quality of the information required.</p> <p>Examine the contracts provided, if applicable, by spot checks.</p> <p>An applicant fund that does not demonstrate a significant, measurable and aligned investment in accordance with the methodologies and investment strategy of the management company in the human and material resources of the ESG analysis does not meet this criterion.</p>

		- Internal communication (funds managers, salespersons etc.) of the extra-financial analyses conducted.	
Pillar III- Inclusion of ESG criteria in the portfolio's construction and operation			
3.1	Criterion 3.1- The ESG strategy is explicitly defined, and the result of the implementation of this strategy is measured.	<p>a) The applicant fund provides a complete and up-to-date inventory covering all asset classes in its portfolio including cash, derivatives, sovereign debt (including the number of securities and the latest valuations used), stating in particular, for each asset:</p> <ul style="list-style-type: none"> - The ESG assessment given (rating, score, opinion, contribution to SDGs, etc.); - The origin of this ESG assessment (internal or, if external, the name of the assessing body); - The minimum ESG assessment required for inclusion in the portfolio. <p>Applicant funds whose ESG selection model involves the use of weightings must also state the ESG weighting chosen for each asset or type of asset in the portfolio.</p> <p>b) The percentage of ESG-analysed issuers in the fund must be above 90% on a long-term basis.</p> <p>These percentages can be based on number of issuers or on market capitalisation.</p> <p>c) The applicant fund demonstrates that the result of the implementation of its ESG strategy is measurable. The applicant fund has <u>either</u>:</p> <p>(i) A 20% reduction in its investable ESG universe relative to the fund's initial investment universe (i.e. the worst 20% of securities are eliminated). The applicant fund states in its regulatory documentation the level of reduction of the investable universe it has chosen;</p> <p>(ii) An average ESG rating for the portfolio that is significantly higher (i.e. better) than the average ESG rating of the initial universe. The portfolio's weighted average ESG rating may not under any circumstances be lower than the weighted ESG rating of the fund's initial investment universe, the benchmark or the reference index after eliminating the worst 20% of securities.</p> <p>The applicant fund states in its regulatory documentation the elimination rate of the</p>	<p>Check the completeness and quality of the information required.</p> <p>Check compliance with the quantitative standards stated in b) and c).</p> <p>To assess compliance with a quantitative standard, the certifier, or the auditor, examines compliance with that standard in respect of the fund's legal documentation (prospectus/regulations and/or, where applicable, KIID/KID).</p> <p>Quantified standards are calculated, where applicable, based solely on the eligible portion of the fund, with the exception of bonds and other debt securities issued by public issuers and cash held on an ancillary basis, and French social impact assets (ie. "actifs solidaire") (which are then capped at 10% of the total assets under management at any time).</p>

		worst securities it has chosen for comparison with the initial investment universe of the fund or the benchmark or reference index.	
3.2	Criterion 3.2- The fund's management adopts a long-term perspective; the policy on the use of derivatives is compatible with the fund's objectives and is consistent with its adoption of a long-term perspective.	<p>a) The use of derivative financial instruments must be limited to techniques that enable effective management of the portfolio of securities in which the applicant fund is invested.</p> <p>If the applicant fund uses derivatives, it must state:</p> <ul style="list-style-type: none"> (i) Their nature; (ii) The objective(s) pursued and their compatibility with the fund's long-term management objectives; (iii) Any limits in terms of exposure (by amount and duration); (iv) Where applicable, the monitoring of the fund's ESG performance. <p>The use of derivatives must not alter the ESG selection policy significantly or over the long term.</p> <p>b) If the fund uses securities lending/borrowing, it:</p> <ul style="list-style-type: none"> (i) Retrieves the securities to exercise the voting rights, unless this is physically impossible; (ii) States whether the counterparty selection rules integrate ESG criteria. <p>c) The fund cannot hold a short position on an asset selected as ESG in accordance with its own ESG method for selecting assets.</p> <p>A short position is understood to be short selling, firm forward selling without holding the asset in cash, purchasing a put option or selling a call option without holding the assets</p>	<p>Check the completeness and quality of the information required.</p> <p>When compliance with a quantitative standard is required and the applicant fund has not been operating long enough to demonstrate compliance with the standard, the criterion is deemed to have been met if the applicant fund undertakes, as part of the internal control procedures put in place by the management company to ensure the funds' compliance with the SRI guidelines, to comply with the standard and provides the auditor with evidence of compliance with these standards no later than 12 months after the label has been awarded. This calculation may be carried at the same time as the eligibility verification if the fund has been operating long enough.</p>

		<p>in cash. A short position is also understood to be the acquisition of a financial instrument that produces the same effect.</p> <p>In accordance with the criteria defined above, the fund meets the requirements defined in Appendix 4.</p> <p>d) The fund prepares a report enabling auditors and investors to assess the extent to which the fund deviates from or approaches its benchmark indicator over the long term (10 years or since creation of the fund, whichever is the shorter) detailing at least the following indicators:</p> <ul style="list-style-type: none"> - comparative performance (through a chart and a table), - portfolio volatility versus index volatility, and - the annualised standard deviation of the fund's relative performance compared to its benchmark index (or tracking error, which must correspond to that of a truly active fund), - any warning required (MiFID rules) if the financial objectives have not been achieved in a marked or sustainable manner, - the reasons for a prolonged inability to meet the stated financial objectives must be communicated to - and reviewed by - the assessor, 	<p>Quantified standards are calculated, where applicable, based solely on the eligible portion of the fund, with the exception of bonds and other debt securities issued by public issuers and cash held on an ancillary basis, and French social impact assets (ie. "actifs solidaire") (which are then capped at 10% of the total assets under management at any time).</p> <p>To assess "long-term" compliance with a quantitative standard, the certifier or auditor examines the presence of these quantified standards in the fund's regulatory documentation. These standards must therefore be complied with at all times.</p> <p>If it is physically impossible to retrieve the securities, the cost of the transaction is assessed in relation to the weighting of the securities in the portfolio.</p>
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Pillar IV- The ESG engagement policy (dialogue and voting) with issuers			
4	Criterion 4- The general voting policy and the resources put in place are consistent with the fund's objectives.	<p>a) The voting policy must have been formalised by the asset management company and published on the asset management company's website. To this end, the fund provides the latest internal control report produced by the head of compliance and internal control on the implementation of the voting policy.</p> <p>b) The management company describes its voting policy, notably with respect to ESG aspects, stating:</p> <p>(i) The content of the formalised ESG engagement policy (in particular: submission of resolutions, monitoring of companies in the event of a controversy, etc.);</p> <p>(ii) The content of the formalised ESG voting policy, indicating the voting rate (number of resolutions submitted, per E, S and G category).</p> <p>(iii) On its website, where applicable on the page dedicated to fund, the publication of the votes relating to the resolutions presented at the general meetings of the companies whose securities are held in its portfolios;</p> <p>(iv) The human resources, or the external resources (consulting), dedicated to the ESG engagement and voting policy and their connection with ESG targeting resources;</p> <p>(v) Number of issuers with which the fund has established a relationship, number of approaches made to issuers, examples of successes and failures, where applicable. This number will be compared with the number of issuers in the ESG universe invested in.</p> <p>(vi) How this engagement and voting policy is consistent with the fund's extra-financial objectives.</p> <p>c) The fund describes any other significant action undertaken regarding the portfolio's issuers.</p>	<p>Check the completeness and quality of the information required.</p> <p>An applicant fund that does not participate in the company life of its investments does not meet this criterion.</p>

Pillar V- Enhanced transparency			
5.1	<p>Criterion 5.1- Formalised communication with distributors and investors is put in place, ensuring their proper understanding of the fund's strategy and objectives.</p>	<p>a) The fund provides the latest management reports sent to investors, stating their frequency and the targets (investors and distributors or distributors only).</p> <p>b) An ESG management report must be sent to investors at least annually.</p> <p>c) The fund provides information on its policy on communicating with investors and distributors, in particular:</p> <ul style="list-style-type: none"> (i) Any method for communicating with investors and distributors; (ii) Policy on handling investor questions or complaints; (iii) Its ability to modify the ESG investment strategy or the investment management practices following questions or complaints from investors and distributors; (iv) Where applicable, surveys of investors' expectations regarding ESG management and their satisfaction with the results obtained. <p>d) The fund publishes the complete inventory of the portfolio for greater transparency, in a legible and accessible manner for retail investors, at least annually with a maximum delay of 6 months and makes it available on its website on the page dedicated to the fund concerned. This provision does not apply to professional funds or funds dedicated to a maximum of 20 holders referred to in Article L. 214-26-1.</p> <p>e) The information published by the fund comply with the rules in force for the protection of investors in the funds.</p>	<p>Check the completeness, suitability and quality of the information required.</p>
5.2	<p>Criterion 5.2- Compliance with SRI portfolio management rules is internally controlled and these rules are clearly described to investors.</p>	<p>a) The asset management company describes its policies on ESG risks management and communication with investors.</p> <p>b) The asset management company provides documentation demonstrating that the head of risk control and the head of compliance and internal control are aware of the specific issues surrounding ESG portfolio management, and that they actually verify the correct application of the ESG strategy and the monitoring of the SRI label's quantitative standards.</p> <p>The fund has an internal control and periodic control structure that enables it to integrate, internally or via service providers, an update on the ESG strategy's compliance into a compliance report.</p>	<p>Check the completeness, suitability and quality of the information required.</p>

		The fund provides the latest report written on the subject.	
Pillar VI- Demonstration of ESG performance monitoring of the fund's portfolio			
6	<p>Criterion 6- The evolution of ESG performance monitoring</p> <p>The ESG performance of selected issuers is monitored.</p>	<p>The fund provides information on its tracking of the evolving ESG performance of each issuer in relation to the ESG characteristics used in the portfolio management.</p> <p>The fund states and makes public:</p> <ul style="list-style-type: none"> - The resources, in particular human resources, used, - The method for assessing ESG performance and quality development, and in particular the tracking indicators chosen, - The results obtained by differentiating between (i) environmental performance, (ii) social performance, (iii) governance performance and (iv) human rights performance. - The engagement actions implemented in relation to each of the indicators - A comparative study of the portfolio's performance on the basis of indicators used over the long term in order to study the issuers' progress <p>i. the asset management company presents the results of the tracking of the portfolio's ESG characteristics to the issuers</p> <p>ii. the portfolio must have performed better on at least two indicators compared to the benchmark index/initial universe. In order to take into account the necessary progress in the availability of extra-financial data from issuers, the AMC shall implement these indicators gradually: a first indicator shall be implemented before the end of 2020 with a coverage rate of at least 90% and a second before the end of 2021 with a coverage rate of at least 70%.</p> <p>For funds being created, the fund indicates the ESG performance indicators that it intends to implement and monitor.</p> <p>Details of the information to be provided are set out in Appendix 4.</p>	Check the completeness, suitability and quality of the information required.

B.- Real estate asset management funds

Criterion No.	Criteria	Information required, standard to be met	Inspection points, inspection method, procedure for concluding whether a requirement or criterion has been met
Pillar I- The objectives targeted by the fund by taking ESG criteria into account for real estate assets			
1.1	Criterion 1- The general, financial and specific ESG objectives targeted by taking ESG criteria into account in the investment policy are clearly described in the commercial documents intended for investors.	<p>The applicant provides the following information or answers the following questions:</p> <p>(i) What are the general objectives targeted by taking ESG criteria into account in the investment policy, including, where applicable, the monitoring of issuers' ESG performance (see Pillar VI)? How are they defined and described to investors?</p> <p>(ii) Do you have objectives of a financial nature (medium-term outperformance, risk reduction, or profitability/risk trade-off, etc.) or other objectives (ethical, etc.) linked to taking ESG criteria into account? If so, what are they and how are they defined and described to investors?</p> <p>(iii) What are the...: - environmental - social - corporate governance ...objectives targeted by taking ESG criteria into account in the investment policy? How are these objectives defined and described to investors?</p>	<p>Check the completeness and quality of information provided by the applicant in respect of the documentation required and the questions asked.</p> <p>The auditor checks that the documentation addresses points (i) to (iii).</p> <p>An applicant fund that does not declare specific environmental, social and governance objectives (for example, those referred to in Pillar VI) does not meet this criterion.</p>
Pillar II- Real estate asset analysis and rating methodology used by the asset management company			
2.1	Criterion 2.1- The ESG assessment methodology is clearly described and the fund management	<p>The applicant fund's management company provides:</p> <p>i. Documentation available to investors that describes the ESG assessment method and how the implementation of this method influences its investment and management policy;</p>	Check the accuracy, completeness, suitability and quality of the documentation provided by the applicant in respect

	<p>company demonstrates its ability to take these criteria into account in its investment policy.</p>	<p>ii. A presentation of the ESG analysis tools and methods (proprietary tool with internal rating scale, external rating scale, reference to external ratings, frequency of rating review, etc.);</p> <p>iii. A presentation of the asset selection and management strategy taking into account ESG criteria (quantitative tools, fundamental or technical analysis, consideration of rating changes, type of exclusions practised, management of controversies, etc.).</p> <p>For funds being created, the management company describes the ESG assessment methodology for assets that it intends to implement for the applicant fund.</p>	<p>of the documentation required and the questions asked.</p> <p>Check that the ESG assessment method is available to and understandable by investors.</p> <p>Checks that the methodology is reviewed at least annually.</p> <p>An applicant fund that declares an ESG methodology that does not in actual fact result in a selection of ESG assets or demonstrate that the ESG rating of the assets has been maintained or improved over the holding period does not meet this criterion.</p> <p>For funds being created, check that the applicant fund's contractual and regulatory documentation complies with the requirements.</p>
2.2	<p>Criterion 2.2- The fund management company puts in place reliable internal or external resources to conduct its analysis and demonstrates a real effort to analyse and understand the information it has at its disposal.</p>	<p>a) The applicant fund's management company or the applicant mandate manager provides the following information:</p> <p>(i) List stating the external sources of information used in the ESG analysis (financial, non-financial and ESG rating agencies, research from brokers, independent analysts, consultants, NGOs, database providers, etc.);</p> <p>(ii) Contracts signed with these third parties during the 12 months preceding the application date;</p> <p>(iii) Methodology for using external data.</p> <p>b) The applicant fund's management company or the applicant mandate manager provides available information on the human resources</p>	<p>Check the completeness and quality of the information required.</p> <p>Examine the contracts provided, if applicable by spot checks.</p> <p>Check that responsibility for ESG analysis is clearly assigned internally and that the person concerned reports</p>

		<p>dedicated internally to the ESG analysis, in particular:</p> <ul style="list-style-type: none"> - Size and level of expertise of the ESG research teams (training, years of experience, etc.); - Training in ESG analysis and time spent by the management company on training during the 12 months preceding the application date; - Internal communication (managers, salespersons etc.) of the non-financial analyses conducted. <p>At the very least, responsibility for ESG analysis must be assigned to a clearly identified person who reports to a member of the Executive Committee of the management company or of the Group to which it belongs.</p>	<p>to a member of the Executive Committee.</p> <p>An applicant fund or manager that does not demonstrate a significant investment in the human and material resources of the ESG analysis does not meet this criterion.</p>
Pillar III- Inclusion of ESG criteria in the portfolio's construction and operation			
3.1	<p>Criterion 3.1- The ESG strategy is explicitly defined, and the result of the implementation of this strategy is measured.</p>	<p>a) The applicant fund provides annually a complete and up-to-date inventory of its portfolio (including the latest valuations), stating in particular, for each asset:</p> <ul style="list-style-type: none"> i. The ESG assessment (rating, score, opinion, etc.) given to each assessed asset; ii. The origin of this ESG assessment (internal or, if external, the name of the assessing body); iii. The minimum ESG assessment required for inclusion in the portfolio; iv. For assets for which the ESG assessment given is below the minimum ESG assessment, the initial ESG assessment, the existence or otherwise of a formalised improvement plan in the asset's business plan, its duration and the target ESG assessment. <p>It also provides:</p> <ul style="list-style-type: none"> v. Explanations on the choice of the minimum ESG assessment chosen in accordance with the fund's strategy and objectives, regulatory texts (the minimum ESG rating must reflect a performance that exceeds legal requirements) and based on tangible information (sector standard, market study, internal benchmark, etc.); vi. Explanations on the weightings assigned to the three E, S and G areas in addition to the various criteria taken into account for the ESG assessment. <p>Applicant funds with more than 80% of their assets (by value) having an ESG assessment</p>	<p>Check the accuracy, completeness, suitability and quality of the information provided by the applicant in respect of the information required.</p> <p>Examine, by carrying out a spot check, whether the ESG assessments of the assets and the average assessment of each portion of the fund are correctly established.</p> <p>Check compliance with the quantitative standards stated in b) and c).</p> <p>When compliance with a quantitative standard is required and the applicant fund has not been operating long enough to demonstrate compliance with</p>

		<p>above the minimum ESG assessment demonstrate that the ESG assessment methodology used is based on the use of quantitative indicators from the acquisition phase, at least for the 4 mandatory reporting indicators (energy, GHG emissions, mobility or health/comfort of occupants, supply chain management), and justify the choice of the minimum ESG assessment chosen for each indicator based on tangible information (sector standard, market study, internal benchmark, etc.). For each asset with an ESG assessment higher than the minimum ESG assessment, the applicant fund demonstrates that the value of the energy and GHG emissions indicators is lower than the average value of a recent reference market benchmark (e.g. the Green Building Observatory's (<i>Observatoire de l'Immobilier Durable</i> - OID) barometer of the environmental and energy performance of tertiary buildings or equivalent) for the asset class and market concerned. In the absence of data available in the OID's database or equivalent, the applicant fund may proceed by country or asset typology analogy or propose other justified systems.</p> <p>Applicant funds whose ESG selection and management model involves the use of weightings must also state the ESG weighting chosen for each asset or type of asset in the portfolio.</p> <p>b) The percentage of ESG-analysed assets in the fund's portfolio must be permanently above 90% in value (this 10% tolerance is intended to take into account the case of recently acquired assets that have not yet been subject to an ESG assessment at the time of the labelling audit, or assets that have not been subject to an ESG assessment because they are intended to be disposed of).</p> <p>c) The applicant fund demonstrates that the result of the implementation of its ESG strategy is measurable. The applicant fund shows:</p> <p>i. Maintenance, at least, of the average ESG assessment of the portion of assets with an initial ESG assessment higher than the minimum ESG assessment;</p> <p>ii. A significant improvement in the medium term (3 years) of the average ESG assessment of the portion of assets with an initial ESG assessment below the minimum ESG assessment. To be considered significant, this improvement must be greater than 20 points on a scale of 1 to 100 (or equivalent), or</p>	<p>the standard, the criterion is deemed to have been met if the applicant fund undertakes, as part of the internal control procedures put in place by the management company to ensure the funds' compliance with the SRI guidelines, to comply with the standard and provides the auditor with evidence of compliance with these standards no later than 12 months after the label has been awarded and after its annual monitoring audit.</p> <p>Quantified standards are calculated, where applicable, based solely on the eligible portion of the fund.</p> <p>To assess "long-term" compliance with a quantitative standard, the certifier examines the presence of these quantified standards in the fund's regulatory documentation. These standards must therefore be complied with at all times.</p> <p>An applicant fund that is unable to justify the choice of the minimum ESG assessment chosen does not meet this criterion.</p>
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		<p>achieve the fund's minimum ESG assessment. In particular, the fund must:</p> <ul style="list-style-type: none"> - formalise an improvement plan and define a target ESG assessment for each of the assets in the relevant portion, - set a target of significantly improving the average ESG assessment of this portion within 3 years, in line with the target ESG assessments of the assets in it, - demonstrate proper implementation of the formalised improvement plans at the asset level and validate the achievement of the set improvement objective, - maintain the ESG assessment of the asset, once the target ESG assessment has been achieved. The management company must be able to justify the target ESG assessment of the assets included in the fund with an initial ESG assessment below the minimum ESG assessment based on tangible information (sector standard, market study, internal benchmark, etc.). <p>The average ESG rating of the portion can be calculated on a current or constant scope basis.</p> <p>For funds being created, the management company describes the investment and management policy that it intends to implement for the applicant fund.</p>	<p>An applicant fund with more than 80% of its assets (by value) having an ESG assessment above the minimum ESG assessment and which is unable to demonstrate that its ESG assessment methodology takes into account the 4 mandatory reporting indicators (energy, GHG emissions, mobility or health/comfort of occupants, supply chain management) on the one hand, or to demonstrate that the value of the energy and GHG emissions indicators is below the average value of a recent reference market benchmark for each asset with an ESG assessment above the minimum ESG rating on the other hand, does not meet this criterion.</p> <p>An applicant fund whose ESG assessment methodology does not comply with the requirements described in Appendix 3, relating to the weightings assigned to the 3 E, S and G areas and to the various ESG criteria taken into account, does not meet this criterion.</p> <p>An applicant fund that is unable to demonstrate the</p>
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			<p>existence of a formalised improvement plan or is unable to justify the associated target ESG assessment for assets with an initial ESG assessment below the minimum ESG assessment does not meet this criterion.</p> <p>An applicant fund that has not set a target of significantly improving, within 3 years, the average ESG performance of the portion of assets, with an initial ESG assessment below the minimum ESG assessment, does not meet this criterion.</p> <p>An applicant fund that is unable to demonstrate proper implementation of the defined improvement plans or to demonstrate the achievement, within 3 years, of the objective of improving the average ESG performance of the portion of assets, with an initial ESG assessment below the minimum ESG rating, does not meet this criterion.</p> <p>For funds being created, check that the applicant fund's contractual and regulatory documentation</p>
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			complies with the requirements.
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Pillar IV- The ESG engagement policy with key stakeholders			
4.1	Criterion 4- The engagement policy with key stakeholders and the resources put in place are consistent with the fund's objectives.	<p>a) The fund's engagement policy with its key stakeholders (tenants and users, service providers including contractors) must have been formalised by the management company and published on its website in accordance with the regulatory constraints of the funds concerned (via free access for funds open to retail investors and via secure access for funds open only to professional investors). To this end, the fund provides the SRI policy that describes the fund's ESG engagement policy and a report showing the results of the implementation of this policy.</p> <p>b) The fund describes its engagement policy, particularly with regard to its pursuit of ESG performance, stating:</p> <p>i. The content of the formalised ESG engagement policy (in particular: user guide, environmental appendix, green lease, trading platform, etc.);</p> <p>ii. The human resources, or external resources (consulting), dedicated to the policy on ESG engagement;</p> <p>iii. The number of stakeholders with whom the fund has established a relationship, the number of approaches made to stakeholders, and examples, where applicable, of successes and failures. This number shall be related to the number of stakeholders in the invested portfolio. In particular, the fund must be able to demonstrate a 1-3 year engagement formalised with 100% of the property and/or facility managers involved in the management of the assets that make up the fund (or integrated property management) and with 100% of the main service providers (developers, project management, delegated project contracting only) who are involved in the fund's assets and who have a direct contractual relationship with the AMC and/or the fund concerned;</p> <p>iv. How this engagement policy is consistent with the fund's pursuit for ESG performance.</p> <p>c) The fund describes any other action undertaken regarding the portfolio's key stakeholders.</p>	<p>Check the accuracy, completeness, suitability and quality of the documentation provided by the applicant in respect of the documentation required.</p> <p>Examine, by carrying out a spot check, whether the indicators relating to the number of stakeholders with whom the fund has established a relationship are correctly established.</p> <p>An applicant fund that has not engaged in an ESG engagement process with its key stakeholders (tenants and users, service providers, including contractors) does not meet this criterion.</p> <p>An applicant fund that does not have an engagement formalised with 100% of the property and/or facility managers involved in the management of the assets that make up the fund or with 100% of the main contractors (developers, project management, delegated project contracting) who are involved in the fund's assets and who have a direct contractual relationship with the AMC and/or the fund concerned does not meet this criterion.</p>
Pillar V- Enhanced transparency			

5.1	<p>Criterion 5.1- Formalised communication with distributors and investors is put in place, ensuring their proper understanding of the fund's strategy and objectives.</p>	<p>a) The fund provides the latest management reports sent to investors, stating their frequency and the targets (investors and distributors or distributors only).</p> <p>b) An ESG management report must be sent to investors at least annually.</p> <p>In this report, the applicant fund communicates at the very least and in a contextualised manner, the ESG assessment of the 5 best-performing assets, the 5 worst-performing assets and the 5 most important assets (by value), stating any improvement plans implemented.</p> <p>c) The fund provides information on its communication policy with investors and distributors, in particular:</p> <ul style="list-style-type: none"> i. Any method for communicating with investors and distributors; ii. Policy on handling investor questions or complaints; iii. The manner in which the ESG investment strategy or management rules are adapted to take into account requests or complaints from investors or distributors; iv. Where applicable, surveys of investors' expectations regarding ESG management and their satisfaction with the results obtained. <p>d) The fund publishes a legible inventory of the portfolio at least annually with a maximum delay of 6 months in accordance with applicable regulatory constraints (available to the general public for funds open to retail investors and via secure access for funds open only to professional investors).</p>	<p>Check the accuracy, completeness, suitability and quality of the information provided by the applicant in respect of the information required.</p> <p>An applicant fund that does not provide investors, on at least an annual basis, with an ESG management report including a contextualised ESG report for the 5 best-performing assets, the 5 worst-performing assets and the 5 most important assets (by value) does not meet this criterion.</p>
5.2	<p>Criterion 5.2- Compliance with SRI management rules is internally inspected and these rules are clearly described to investors.</p>	<p>a) The management company describes its policy on managing ESG risks and communication with investors (internal procedure on SRI management of the fund, etc.).</p> <p>b) The management company provides documentation demonstrating that the head of risk control and the head of compliance and internal control (RCCI) are aware of the specific issues surrounding ESG management, and that they actually verify the correct application of the ESG strategy.</p> <p>The fund has an internal control and periodic control structure that enables it to integrate, internally or via service providers, an update on the ESG strategy's compliance into a compliance report.</p>	<p>Check the completeness, suitability and quality of the information required.</p>

		The fund provides the latest report written on the subject.	
Pillar VI- Demonstration of ESG performance monitoring of the fund's portfolio			
6	Criterion 6- ESG performance on portfolio assets is monitored.	<p>The fund provides information on the organisation of its monitoring of ESG management performance.</p> <p>The fund states and publishes, in accordance with the regulatory constraints of the funds concerned (via public access for funds open to retail investors and via secure access for funds open only to professional investors):</p> <ul style="list-style-type: none"> - The resources, in particular human resources, used, - The method for assessing performance, - The results obtained by differentiating between (i) environmental performance, (ii) social performance, (iii) governance performance, - The engagement actions implemented in relation to each of the indicators, - A comparative study of the performance indicators in relation to the initial universe (sector standard, market study, internal benchmark, etc.): the portfolio must have performed better on at least two indicators compared to the reference index/initial universe. <p>In order to take into account the necessary progress in the availability of non-financial data from issuers, the AMC shall implement these indicators gradually: a first indicator shall be implemented before the end of 2020 with a coverage rate of at least 90% and a second before the end of 2021 with a coverage rate of at least 70%. For funds being created, the fund indicates the ESG performance indicators that it intends to implement and monitor.</p> <p>Details of the information to be provided are set out in Appendix 5.</p>	<p>Check the completeness, suitability and quality of the information required.</p> <p>Check that the method for developing indicators is transparent, clear and sufficiently documented to be auditable (existence of evidence and audit trails).</p> <p>For funds being created, check that the applicant fund's contractual and regulatory documentation complies with the requirements.</p>

C.- Portfolio management mandates

Criterion No.	Criteria	Information required, standard to meet	Inspection points, inspection method, procedure for concluding whether a requirement or criterion has been met
Pillar I- The objectives targeted by the mandate by taking ESG criteria into account for issuers			
1	Criterion 1- The general, financial and specific ESG objectives targeted by taking ESG criteria into account in the investment policy are clearly described in the commercial documents intended for investors.	<p>The applicant provides the following information or answers the following questions:</p> <p>(i) What are the general objectives targeted by taking ESG criteria into account in the investment policy, including, where applicable, the monitoring of issuers' ESG performance (see Pillar VI)? How are they defined and described to investors?</p> <p>(ii) Do you have objectives of a financial nature (medium-term outperformance, risk reduction, or profitability/risk trade-off, etc.) or other objectives (ethical, etc.) linked to taking ESG criteria into account? If so, what are they and how are they defined and described to investors?</p> <p>(iii) What are the...:</p> <ul style="list-style-type: none"> - environmental - social (human resources and human rights) - corporate governance <p>...objectives targeted by taking ESG criteria into account in the investment policy?</p> <p>How are these objectives defined and described to investors?</p>	<p>Check the completeness and quality of information provided by the applicant in respect of the documentation required and the questions asked.</p> <p>The auditor checks that the documentation addresses points (i) to (iii).</p> <p>An applicant that does not declare specific environmental, social and governance objectives (for example, those referred to in Pillar VI) does not meet this criterion.</p>

Pillar II- Issuer analysis and rating methodology used by the asset management company			
2.1	<p>Criterion 2.1- The ESG assessment methodology is clearly described and the mandate manager demonstrates its ability to take these criteria into account in its investment objectives.</p>	<p>The applicant mandate manager:</p> <p>(i) Provides documentation available to investors that describes:</p> <ul style="list-style-type: none"> - The ESG assessment method; - How the implementation of this method influences its investment policy or its investment decisions within the mandate; <p>(ii) Provides a presentation of the ESG analysis tools and methods (proprietary tool with internal rating scale, external rating scale, reference to external ratings, frequency of rating review, etc.);</p> <p>(iii) Provides a presentation describing the strategy for selecting ESG assets and the method for transitioning from an ESG investment universe to an ESG portfolio (quantitative tools, discretionary, fundamental or technical analysis, consideration of rating changes, type of exclusions practised, management of controversies, etc.).</p>	<p>Check the completeness and quality of the documentation provided by the applicant in respect of the documentation required and the questions asked.</p> <p>The auditor checks that the ESG assessment method is available to investors.</p> <p>The auditor checks that the methodology is reviewed at least annually.</p> <p>An applicant fund that declares an ESG assessment methodology that does not actually result in the selection of ESG assets does not meet this criterion.</p>
2.2	<p>Criterion 2.2- The mandate manager puts in place reliable internal or external resources to conduct its analysis and demonstrates a real effort to analyse and understand the information it has at its disposal.</p>	<p>a) The applicant mandate manager provides the following information:</p> <p>(i) List stating the external sources of information used in the ESG analysis (financial, extra-financial and ESG rating agencies, research from brokers, independent analysts, consultants, NGOs, database providers, etc.);</p> <p>(ii) Contracts signed with these third parties during the 12 months preceding the application date;</p> <p>(iii) Methodology for using external data.</p> <p>b) The applicant mandate manager provides available information on the human resources dedicated internally to the ESG analysis, in particular:</p> <ul style="list-style-type: none"> - Size and level of expertise of the ESG research teams (training, years of experience, etc.); 	<p>Check the completeness and quality of the information required.</p> <p>Examine the contracts provided, if applicable by spot checks.</p> <p>An applicant manager that does not demonstrate a significant investment in the human and material resources of the ESG</p>

		<ul style="list-style-type: none"> - Training in ESG analysis and time spent by the management company on training during the 12 months preceding the application date; - Internal communication (fund managers, salespersons etc.) of the extra-financial analyses conducted. 	analysis does not meet this criterion.
Pillar III- Inclusion of ESG criteria in the portfolio's construction and operation			
3.1	<p>Criterion 3.1- The ESG strategy is explicitly defined, and the result of the implementation of this strategy is measured.</p>	<p>a) The applicant mandate manager provides a complete and up-to-date inventory of its portfolio (including the number of securities and the latest valuations chosen), stating in particular, for each asset:</p> <ul style="list-style-type: none"> - The ESG assessment given (rating, score, opinion, etc.); - The origin of this ESG assessment (internal or, if external, the name of the assessing body); - The minimum ESG assessment required for inclusion in the portfolio. <p>Where the ESG selection model involves the use of weightings, the representative must also state the ESG weighting decided for each asset or type of asset in the portfolio.</p> <p>b) The percentage of ESG-analysed issuers in the portfolio must be above 90% on a long-term basis.</p> <p>These percentages can be based on number of issuers or on market capitalisation.</p> <p>c) The applicant mandate demonstrates that the result of the implementation of its ESG strategy is measurable. The applicant mandate can either apply:</p> <ul style="list-style-type: none"> (i) A 20% reduction in its investable ESG universe relative to the mandate's initial investment universe (i.e. the worst 20% of securities are eliminated); (ii) An average ESG rating for the portfolio that is significantly higher (i.e. better) than the average ESG rating of the initial universe. The portfolio's weighted average ESG rating may not under any circumstances be lower than the weighted ESG rating of the initial investment universe of the benchmark or the reference index after eliminating the worst 20% of securities. <p>The applicant mandate states in its regulatory documentation the elimination rate of the worst securities it has chosen for comparison with the initial investment universe of the mandate or the benchmark or benchmark index.</p>	<p>Check the completeness and quality of the information required.</p> <p>Check compliance with the quantitative standards stated in b) and c).</p> <p>When compliance with a quantitative standard is required and the applicant mandate does not comply with it, or the applicant mandate has not been operating long enough to demonstrate compliance with the standard, the criterion is deemed to have been met if the applicant mandate undertakes to comply with the standard no later than 12 months after the label has been awarded.</p> <p>Quantified standards are calculated, where applicable, based solely on the eligible portion of</p>

			<p>the mandate, with the exception of bonds and other debt securities issued by public or quasi-public issuers and cash held on an ancillary basis, and French social impact assets (ie. “actifs solidaires”) (which are then capped at 10% of the total assets under management at any time).</p> <p>To assess “long-term” compliance with a quantitative standard, the auditor examines the average of this standard over the portfolio's history during the 12 months preceding the application to award the label.</p>
3.2	<p>Criterion 3.2- The mandate's management adopts a long-term perspective; the policy on the use of derivatives is compatible with the mandate's objectives and is consistent with its adoption of a long-term perspective.</p>	<p>a) The use of derivative financial instruments must be limited to techniques that enable effective management of the portfolio of securities in which the applicant mandate is invested.</p> <p>If the applicant mandate uses derivatives, it must state:</p> <ul style="list-style-type: none"> (i) Their nature; (ii) The objective(s) pursued and their compatibility with the fund's long-term management objectives; (iii) Any limits in terms of exposure (by amount and duration); (iv) Where applicable, the monitoring of the fund's ESG performance. <p>The use of derivatives must not alter the ESG selection policy significantly or over the long term.</p> <p>b) The portfolio may not include a short position on an asset selected as ESG in accordance with its own ESG method for selecting assets.</p>	<p>Check the completeness and quality of the information required.</p> <p>When compliance with a quantitative standard is required and the applicant mandate does not comply with it or the applicant fund has not been operating long enough to demonstrate compliance with the standard, the criterion is deemed to have been met if the applicant fund or mandate undertakes to</p>

		<p>A short position is understood to be short selling, firm forward selling without holding the asset in cash, purchasing a put option or selling a call option without holding the assets in cash. A short position is also understood to be the acquisition of a financial instrument that produces the same effect.</p> <p>In accordance with the criteria defined above, the mandate meets the requirements defined in Appendix 4.</p>	<p>comply with the standard no later than 12 months after the label has been awarded.</p> <p>Quantified standards are calculated, where applicable, based solely on the eligible portion of the mandate (including cash), with the exception of bonds and other debt securities issued by public or quasi-public issuers, cash held on an ancillary basis, and French social impact assets (ie. "actifs solidaires") (which are then capped at 10% of the total assets under management at any time).</p> <p>To assess "long-term" compliance with a quantitative standard, the certifier or auditor examines the average of this standard over the portfolio's history during the 12 months preceding the application to award the label.</p> <p>If it is physically impossible to retrieve the securities, the cost of the transaction is assessed in relation to the weighting of the securities in the portfolio.</p>
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Pillar IV- The ESG engagement policy (dialogue and voting) with issuers			
4.1	Criterion 4- The general voting policy and the resources put in place are consistent with the mandate's objectives.	<p>a) The voting policy must have been formalised by the principal and published on the principal's website. To this end, where applicable, the principal provides the latest internal control report produced by the head of compliance and internal control on the implementation of the voting policy.</p> <p>b) The principal describes its voting policy, notably with respect to its pursuit of ESG performance, stating:</p> <p>(i) The content of the formalised ESG engagement policy (in particular: submission of resolutions, monitoring of companies in the event of a controversy, etc.);</p> <p>(ii) The content of the formalised ESG voting policy, indicating the voting rate (number of resolutions submitted, per E, S and G category).</p> <p>(iii) The publication of voting statistics relating to the fund in the case where the principal has delegated the exercise of voting rights to the representative;</p> <p>(iv) The human resources, or the external resources (consulting), dedicated to the ESG engagement and voting policy and their connection with ESG research resources;</p> <p>(v) Number of issuers with which the fund has established a relationship, number of approaches made to issuers, examples of successes and failures, where applicable. This number will be compared with the number of issuers in the ESG universe invested in.</p> <p>(vi) How this engagement and voting policy is consistent with the fund's pursuit of ESG performance.</p> <p>c) The principal describes any other significant action undertaken regarding the portfolio's issuers</p>	<p>Check the completeness and quality of the information required.</p> <p>A principal that does not participate in the company life of its investments does not meet this criterion.</p>
4.2	Criterion 4- The general voting policy and the resources put in place are consistent with the principal's objectives.	<p>a) In the event of a mandate concluded with professional clients, the voting and dialogue rights with the issuer are exercised by the principal.</p>	<p>Where applicable, check the completeness and quality of the information required.</p>

Pillar V- Enhanced transparency			
5.1	<p>Criterion 5.1- Formalised communication with investors is put in place, ensuring their proper understanding of the fund's strategy and objectives.</p>	<p>a) The representative provides the latest portfolio management reports sent to investors, stating their frequency and the targets (investors and distributors or distributors only).</p> <p>b) An ESG management report must be sent to investors at least annually.</p> <p>c) The representative provides information on its policy on communicating with investors, in particular:</p> <ul style="list-style-type: none"> (v) Any method for communicating with investors; (vi) Policy on handling investor questions or complaints; (vii) Its ability to modify the ESG investment strategy or the investment management practices following questions or complaints from investors; (viii) Where applicable, surveys of investors' expectations regarding ESG management and their satisfaction with the results obtained. <p>d) The representative publishes a legible inventory of the portfolio at least annually with a maximum delay of 6 months in accordance with applicable regulatory constraints (available to the public for funds open to retail investors and via secure access for funds open only to professional investors).</p>	<p>Check the completeness, suitability and quality of the information required.</p>
5.2	<p>Criterion 5.2- Compliance with SRI management rules is internally inspected and these rules are clearly described to investors.</p>	<p>a) The representative describes its policy on ESG risks management and communication with investors.</p> <p>b) The representative provides documentation demonstrating that the head of risk control and the head of compliance and internal control are aware of the specific issues surrounding ESG portfolio management, and that they actually verify the correct application of the ESG strategy.</p> <p>The representative has an internal control and periodic control structure that enables it to integrate, internally or via service providers, an update on the ESG strategy's compliance into a compliance report.</p> <p>The representative provides the latest report written on the subject.</p>	<p>Check the completeness, suitability and quality of the information required.</p>

Pillar VI- Demonstration of ESG performance monitoring of the fund's portfolio			
6	<p>Criterion 6- The performance of ESG management on selected issuers is monitored.</p>	<p>The representative provides information on its tracking of the evolving ESG performance of each issuer in relation to the ESG characteristics used in the portfolio management.</p> <p>The representative states and makes public:</p> <ul style="list-style-type: none"> - The resources, in particular human resources, used, - The method for assessing ESG performance and quality development, and in particular the tracking indicators chosen, - The results obtained by differentiating between (i) environmental performance, (ii) social performance, (iii) governance performance and (iv) human rights performance. - The engagement actions implemented in relation to each of the indicators - A comparative study of the portfolio's performance on the basis of indicators used over the long term in order to study the issuers' progress <p>i. the asset management company presents the results of the tracking of the portfolio's ESG characteristics to the issuers</p> <p>ii. the portfolio must have performed better on at least two indicators compared to the benchmark index/initial universe.</p> <p>In order to take into account the necessary progress in the availability of extra-financial data from issuers, the representative shall implement these indicators gradually: a first indicator shall be implemented before the end of 2020 with a coverage rate of at least 90% and a second before the end of 2021 with a coverage rate of at least 70%.</p> <p>For funds being created, the fund indicates the ESG performance indicators that it intends to implement and monitor.</p> <p>Details of the information to be provided are set out in Appendix 4.</p>	<p>Check the completeness, suitability and quality of the information required.</p>

Appendices

Appendix 1 - Glossary

AFG	French asset management association (<i>Association Française de la Gestion financière</i>)
AIFM	Alternative Investment Fund Managers
AMF	French financial markets authority (<i>Autorité des Marchés Financiers</i>).
ASPIM	French association for real estate investment companies (<i>Association Française des Sociétés de Placement Immobilier</i>)
KIID	Key Investor Information Document
ESG	Environmental, Social, and Corporate Governance
EPRA	European Public Real Estate Association
AIF	Alternative Investment Funds
FIR	Socially responsible investment forum (<i>Forum pour l'Investissement Responsable</i>)
FIVG	General investment fund (<i>Fonds d'Investissement à Vocation Générale</i>)
FPI	Real estate investment fund (<i>Fonds de Placement en Immobilier</i>)
GECO	Database of savings products and management companies approved by the AMF
GHG	Greenhouse gas
INREV	European Association for Investors in Non-Listed Real Estate Vehicles
INSEE	French national institute for statistics and economic research (<i>Institut National de la Statistique et des Etudes Economiques</i>)
MIF	Markets in Financial Instruments
OPCI	Undertaking for collective investment in real estate (<i>Organisme de Placement Collectif Immobilier</i>)
OPPCI	Undertaking for professional collective investment in real estate (<i>Organisme de placement professionnel collectif immobilier</i>)
UCITS	Undertaking for collective investment in transferable securities
PRI	Principles for Responsible Investment
RCCI	Head of compliance and internal control (<i>Responsable de la Conformité et du Contrôle Interne</i>)
RCS	Trade and Companies Register
CSR	Corporate Social Responsibility
SA	French public limited company (<i>Société Anonyme</i>)
SAS	French simplified joint-stock company (<i>Société par Action Simplifiée</i>)

SCI	French non-trading real estate company (<i>Société Civile Immobilière</i>)
SCPI	French real estate investment company (<i>Société Civile de Placement Immobilier</i>)
SPPICAV	French investment company with variable capital investing primarily in real estate (<i>Société de Placement à Prépondérance Immobilière à Capital Variable</i>)

Appendix 2 - List of documents to be provided by the applicant fund

1. Contractual and regulatory fund documentation: Prospectus (OPCI) or regulations, briefing note (SCPI), KID or KIID (SCPI and OPCI/OPPCI), declaration to the Trade and Companies Register (AIF in real estate "by object"), etc. (for funds in formation: draft contractual and regulatory fund documentation)
2. Civil law contract in the case of a management mandate
3. The transparency code for all SRI funds open to the public, managed by management companies that are members of the AFG, ASPIM or FIR
4. Commercial material, report (the latest) and management report
5. Detailed portfolio statement in accordance with the requirements stated in criterion 3.1 (except for funds of funds)
6. For funds of funds only, a portfolio statement in accordance with the requirements stated in eligibility criterion 4
7. List of supply contracts stated in criterion 2.2
8. Table (or data) enabling verification, where applicable, of compliance with criterion 3.1 c)
9. Fund's engagement policy with its key stakeholders in accordance with the requirements stated in criterion 4.1
10. Summary document meeting the information requirements of criteria 1.1, 2.1, 2.2, 3.1, 4.1, 5.1, 5.2 and 6.1 or annual changes to these criteria in addition to the actual responses to non-conformities, where applicable, in the event of surveillance audits
11. Latest report on the execution of the voting policy and latest internal control report on the compliance of the voting policy
12. Latest internal control report on the compliance of the fund's SRI management procedure in accordance with the requirements of criterion 5.2
13. Descriptive table on the use of derivatives

Appendices specific to securities funds and management mandates

Appendix 3 - Use of derivatives

For both bonds and equities, the use of derivatives is possible but subject to certain conditions. These derivatives are used in addition to a portfolio invested in ESG-analysed securities.

There are two aspects to the management of a fund:

- the selection of portfolio securities
- portfolio construction (managing the operation of the fund)

Derivatives are mainly used in the construction of the portfolio.

- Use of derivatives for hedging purposes: this must be authorised in accordance with the fund's ESG policy. There must be no contradiction with the ESG nature of the fund. The portfolio is always invested in ESG-assessed securities but the performance takes into account the neutralisation of equity market risk.

- Use of derivatives as an exposure: use as an exposure must be temporary in nature. The fund's reporting and any additions made must enable each management company to explain how it does this and, in particular, to illustrate the temporary nature of the use of derivatives as an exposure. Furthermore:

- exposure to a security or an index must be possible, in particular in order to respond to a significant
- movement in liabilities (subscriptions or redemptions);
- in the case of a security, the underlying must be ESG;
- in the case of an index, temporary exposure to the fund's benchmark index must be possible, even if that index is not ESG.
- The use of derivatives to short sell non-ESG securities (for example, outright purchase of put options on non-ESG securities) is inappropriate.

Finally, with regard to OTC instruments, the manager must analyse the ESG quality of the counterparties. In order to illustrate the use of derivatives by the fund, the management company must provide a descriptive table showing the type of derivatives used over the last 12 months. This table contains, in particular, the nature and number of derivatives used, the percentage of the portfolio concerned, the ESG analysis made of the underlyings and counterparties, the strategy (market hedging, liquidity management, etc.) and whether the derivative has an effect on the ESG performance of the portfolio.

Appendix 4 - Information to be provided regarding the significance of the ESG selection

The following information requested is accompanied, where applicable, by certificates of assurance or verification of indicators produced by external third-party organisations. For each indicator provided, the fund shall state:

- Its coverage by number of issuers or assets under management (i.e. a minimum coverage of 90% of the portfolio in line with the other standards of the label);
- Its scope;
- Its calculation method (indicating any changes in method from one year to the next);
- Any difficulties encountered in its preparation;
- An analysis of its changes over the last three years (however, it is accepted that for the first two labelling campaigns, the indicators only concern year Y, then Y & Y-1 respectively);
- A comparison between the monitoring indicator and the initial investment universe of the fund or the benchmark or benchmark index: the fund must have obtained a better result on at least two indicators (E, S, G, HR) compared to its initial universe.

Demonstration of environmental performance

The fund also provides information on its environmental performance, notably in terms of the portfolio's carbon impact. The fund establishes this performance by producing an indicator on direct (scope 1) and indirect greenhouse gas (GHG) emissions linked to the energy consumption required to manufacture a product (scope 2) in its portfolio (in tonnes of CO₂ equivalents), in absolute or relative terms (by reference, for example, to the benchmark index or the assets under management).

Other relevant indicators may be added: avoided GHG emissions (in tonnes), GHG intensity (weighted average of emissions in relation to turnover), etc.

Demonstration of social performance

The fund provides information on the social performance. The fund establishes this performance by producing at least one of the following indicators:

- Percentage of employee directors;
- Rate of absenteeism;
- CEO-to-worker pay ratio;
- Other relevant indicator.

Demonstration of governance performance

The fund provides information on its governance performance. The fund establishes this performance by producing at least one of the following indicators:

- Percentage of companies (or assets under management) for which the directors' variable remuneration integrates ESG criteria;
- Percentage of independent directors;
- Other relevant indicator.

Demonstration of human rights performance

The fund provides information on human rights performance. The fund establishes this performance by producing at least one of the following indicators:

- Percentage of companies (or assets under management) covered by a collective agreement or equivalent;
- Number of controversies concerning human rights at work;
- Other relevant indicator.

Appendices specific to real estate funds

Appendix 5 - Information to be provided on ESG performance measurement (Pillar 6)

The applicant fund provides information on the monitoring of the performance of its investment and management policy by producing performance indicators for each of the three E, S and G reporting areas. Where applicable, this information may be accompanied by a certificate of verification of the indicators produced by an independent third-party organisation.

Depending on the area under consideration, the number of indicators expected and the methods for selecting these indicators vary:

- Environmental performance: the fund must report at least the 2 mandatory indicators proposed for the "energy" and "greenhouse gas (GHG) emissions" themes in the table below;
- Social/societal performance: the fund must report at least 1 mandatory indicator out of those proposed for the "mobility" and "health/comfort of occupants" themes in the table below;
- Governance performance: the fund must report at least 1 mandatory indicator from the "supply chain management" theme (may differ from the indicators proposed in the table below but must address the "supply chain management" theme).

In addition to these 4 mandatory indicators, the fund must also report 4 additional indicators of its choice covering the 3 E, S and G areas. In order to do so, it may use, in particular, the indicators listed in the table below or any other relevant indicator of its choice. The production of additional indicators, reported to an activity unit where applicable, which may be considered more relevant is encouraged.

Asset labels and certifications may be used as other relevant indicators by the fund in the reporting area of its choice (the same label or certification may only be used for one reporting area). On the other hand, they may only be used in addition to the mandatory indicators for each reporting area.

For each indicator provided, the fund must explain the choice of indicators chosen and state:

- Its coverage in terms of value of assets under management;
- Its scope;
- Its calculation method (indicating any changes in method from one year to the next);
- Any difficulties encountered in its preparation and the reasons why (an) additional indicator(s) is/are proposed;
- An analysis of its changes over the last three years (however, it is accepted that for the first two years during which a fund is certified, the indicators only concern year Y, then Y & Y-1 respectively).

Reporting areas	Themes	Proposed ESG performance indicators
Environment	Energy*	Energy performance (e.g. kWh _{ep} /m ² or kWh _{ef} /m ²) all utilities, all uses, common and private areas ¹ , as the energy produced cannot be deducted from actual consumption*
	GHG emissions*	GHG emissions in absolute (e.g. kgCO ₂ eq) or relative (e.g. kgCO ₂ eq/m ²) terms, Scopes 1 & 2 at least, all utilities, all uses, common and private areas, as the energy produced cannot be deducted from actual consumption ^{2*}
	Water management	Water consumption in absolute or relative terms (water taken; water reused)
	Waste management	Percentage of assets equipped with devices to encourage selective waste sorting by occupants
	Biodiversity	Percentage of assets that have been the subject of a biodiversity analysis or integrate a system that promotes biodiversity (green roof/wall, offsetting measures, etc.). Revegetation rate of the plot / Biotope Area Factor (BAF)
	-	Another relevant indicator (e.g. labelling/certification, etc.)

Reporting areas	Themes	Proposed ESG impact indicators
Social/Societal	Mobility*	Proximity to transport hubs by category (public transport, electric vehicle charging stations and bicycle docks, car-pooling assembly points, train stations and airports, road infrastructure: departmental trunk roads, express roads and motorways)
	Health and comfort of occupants*	Percentage of assets covered by a specific analysis on comfort and quality of life (natural light, hygrothermal comfort, noise pollution and odour nuisance) Percentage of assets covered by a system for measuring and improving indoor air quality or water quality Percentage of assets that have been the subject of actions to improve accessibility for people with disabilities that go beyond the regulations
	Services provided to occupants	Percentage of assets equipped with services geared towards the health and well-being of occupants (gym, healthy

¹ Except in the specific case of housing, for which the scope of reporting may be limited to private and/or common areas, and to the uses targeted by the housing energy performance survey.

² The scope of the indicator must be consistent with the recommendations of the EPRA (European Public Real Estate Association). For the calculation of GHG emissions, the fund may rely on the main calculation methods in force: regulatory method Article 75, Bilan Carbone®, ISO 14064 and 14069, GHG Protocol and the emission factors of ADEME's Base Carbone®.

		restaurants, nurseries, green spaces, etc.) or located close to local services and shops
	Contribution to local development	Number of actions carried out that contribute to local development by typology (job creation, integration, training, help for those most in need, community services etc.)
	-	Another relevant indicator (e.g. labelling/certification, etc.)
Governance	Supply chain management (Property manager, etc.)*	Percentage of contracts with service providers including ESG clauses (integration clauses, use of local labour, energy and CO2 emissions awareness actions, etc.) Percentage of service providers audited on compliance with the management company's ESG charter
	Tenant, user and resident relations	Percentage of assets for which an ESG awareness and occupant information system has been set up (user guide, environmental appendices, green lease, etc.). Percentage of assets for which a satisfaction survey incorporating ESG criteria has been carried out
	Resilience	Percentage of assets covered by a monitoring and assessment system aimed at controlling risks related to the consequences of climate change likely to impact stakeholders
	-	Another relevant indicator (e.g. labelling/certification, etc.)

* the themes and indicators in bold and followed by an asterisk correspond to the mandatory themes and/or indicators described above the table

Appendix 6 - Information to be provided on the minimum ESG rating (Pillar 3)

The applicant fund provides explanations on the choice of the minimum ESG assessment chosen in accordance with the fund's strategy and objectives and based on tangible information (sector standard, market study, internal benchmark, etc.). Explanations on the choice of the minimum ESG assessment chosen for each of the criteria contributing to the ESG assessment of an asset is encouraged.

An applicant fund with more than 80% of its assets (by value of the portion of real estate assets) having an ESG assessment above the minimum ESG assessment demonstrates that the ESG assessment methodology used is based on the use of quantitative criteria from the acquisition phase, at least for the 4 mandatory reporting indicators³, and justifies the choice of the minimum ESG assessment chosen for each criterion based on tangible information (sector standard, market survey, internal benchmark, etc.). For each asset with an ESG assessment higher than the minimum ESG assessment, the applicant fund demonstrates that the value of the energy and GHG emissions indicators of each asset is lower than the average value of a recent reference market benchmark⁴ (e.g. the Green Building Observatory's (*Observatoire de l'Immobilier Durable* - OID) barometer of the environmental and energy performance of tertiary buildings or equivalent) for the asset class and market concerned. In the absence of data available in the OID's database or equivalent, the applicant fund may proceed by country or asset typology analogy or propose other justified systems.

By way of illustration, examples of reference values on which the fund can rely to justify the minimum performance threshold chosen are presented in the tables below.

This list is not intended to be exhaustive and may be supplemented as soon as new references are made available on new subjects or new asset classes.

³ Energy, GHG emissions, mobility or health and comfort of occupants, supply chain management.

⁴ Average in force at the time of acquisition of a new asset or average of less than 3 years for assets already in the portfolio at the beginning of the 3-year labelling cycle.

Examples of reference values based on average values from market studies:

Asset class > v Indicators	Office	Retail ⁵	Food supermarkets	Logistics	Mixed tertiary	Housing ⁶
Final energy (kWh _{EF} /m ²)	179	96 (232)	544	146	156	226
Primary energy (kWh _{EP} /m ²)	382	215 (543)	1,326	243	328	257
GHG emissions (kgCO ₂ eq/m ² - Scopes 1 & 2)	16	11 (27)	50	20	19 ⁷	48

Source: Green Building Observatory (*Observatoire de l'Immobilier Durable* - OID), 2019 barometer of the environmental and energy performance of tertiary buildings, January 2020⁸

Examples of minimum reference values based on regulatory requirements (the threshold set for the minimum ESG rating must be higher than these values):

Asset classes >			Office	Retail	Industry	Housing
v Indicators						
Electric charging stations (Number of pre-equipped spaces in the new building, equipped in the existing one)	Nine ⁹	≤ 40 spaces	10%	5%	10%	50%
		> 40 spaces	20%	10%	20%	75%
	Existing ¹⁰	-	5% to 10% ¹¹	N/A ²⁶	N/A ²⁶	N/A ²⁶

⁵ Retail: the values shown relate to consumption excluding estimated consumption by tenants (common areas and heating, ventilation and air conditioning for shops only). The values shown in brackets include estimated consumption by tenants.

⁶ Housing: the values indicated concern consumption relating to common areas and the heating of collective buildings heated by gas or using an urban heating network.

⁷ Mixed tertiary: in the absence of data published in 2019, the value indicated for GHG emissions has been taken from the 2018 barometer of the environmental and energy performance of tertiary buildings published by the OID in January 2019.

⁸ The data provided by the OID are three-year averages (at current scope, weighted by the number of buildings) and cover a sample of 19,500 buildings (i.e. 42 million square metres, including 13 million for offices in the Paris Region, representing 24% of the Paris Region office stock, ORIE 2019 data).

Definition of the indicators:

- Energy: actual energy consumption, all uses, private and common areas (except for shopping centres, common areas only).

- GHG emissions: GHG emissions due to the energy consumption of the building

The units of area used are taken from regulatory texts, the GUA (Gross Usable Area) for all categories except for shops, for which the area used is the GLA (Gross Leasing Area) within the lessor's area.

⁹ Applicable for building permits filed after 1 January 2017.

¹⁰ Applicable from 1 January 2015 for offices and for building permits filed after 1 January 2012 for buildings used mainly for residential or tertiary purposes.

¹¹ 5% when the building is located in an urban area with fewer than 50,000 inhabitants and the parking capacity is more than 40 spaces, 10% when the building is located in an urban area with more than 50,000 inhabitants and the parking capacity is more than 20 spaces

Bicycle parking (Number of spaces or area in m ² according to the asset classes)	Nine	-	1.5% of the FA ¹²	2% to 10% ¹³	15% of the number of occupants	0.75 m ² per 1-2 room dwelling 1.5 m ² per 3-room dwelling and over ¹⁴
	Existing	-	N/A ²⁶	N/A ¹⁵	N/A ²⁶	N/A ²⁶

Sources:

- Bicycle parking for commercial complexes: Order of 3 February 2017 amending the order of 13 July 2016 on the application of Articles R. 111142 to R. 111148 of the French building and housing code (*Code de la construction et de l'habitation*).

- Bicycle parking for new buildings used mainly for residential, office, industrial or tertiary purposes: Order of 13 July 2016 on the application of Articles R. 111-14-2 to R. 111-14-8 of the French building and housing code.

- Pre-fitting of car parks for electric vehicles in new buildings used mainly for residential or tertiary purposes or for commercial complexes: Decree No. 2016-968 of 13 July 2016 on facilities for the recharging of electric or plug-in hybrid electric vehicles and on infrastructures allowing the parking of bicycles during the construction of new buildings

- Fitting of car parks for electric vehicles in existing buildings used mainly for office purposes: Decree No. 2011-873 of 25 July 2011 on facilities for the recharging of electric or plug-in hybrid electric vehicles in buildings and on infrastructures for the secure parking of bicycles

¹² FA: Floor Area.

¹³ ≤ 40 spaces, 10% of the car park capacity (2 spaces minimum) > 40 spaces and ≤ 400 spaces, 5% of the car park capacity (10 spaces minimum) > 400 spaces, 2% of the car park capacity (20 spaces minimum, 50 spaces maximum)

¹⁴ Area of 0.75 m² per dwelling for dwellings with up to two main rooms and 1.5 m² per dwelling in other cases, with a minimum area of 3 m²

¹⁵ N/A: N/A

Appendix 6 - Information to be provided on ESG assessment methodology (Pillar 3)

The applicant fund provides information on the ESG assessment methodology and states the relative weighting in the rating of each of the three E, S and G areas, in addition to that of each of the chosen ESG criteria.

The relative weighting of each area in the ESG rating must respect the thresholds set out below:

- Environment: represents between 30% and 60% of the ESG rating;
- Social/societal: represents between 20% and 50% of the ESG rating;
- Governance: represents between 20% and 30% of the ESG rating.

Depending on the area under consideration, the number of criteria expected and the methods for selecting these indicators vary:

- Environment: the fund must include at least 2 mandatory criteria in its assessment methodology: "energy" and "greenhouse gas (GHG) emissions";
- Social/societal: the fund must include at least 1 mandatory criterion in its assessment methodology, to be chosen between "mobility" and "health/comfort of occupants";
- Governance: the fund must include at least 1 mandatory criterion in its assessment methodology with respect to "supply chain management".

The relative weighting of each mandatory criterion must represent between 10% and 30% of the rating of the area under consideration. In addition to these 4 mandatory criteria, the fund may use any other relevant criterion of its choice while ensuring that the thresholds set out in the table below are respected. The relative weighting of these other relevant criteria may not exceed 30% of the rating of the corresponding area.

Areas > v Requirements for the ESG assessment methodology	Environment	Social/Societal	Governance
Percentage of the area concerned in the overall ESG rating	Between 30% and 60%	Between 20% and 50%	Between 20% and 30%
Percentage of each mandatory criterion ¹⁶ in the area concerned	Between 10% and 30%	Between 10% and 30%	Between 10% and 30%
Sum of the weightings of the mandatory criterion/criteria ¹⁵ in the area concerned	Between 20% and 60%	Between 10% and 30%	Between 10% and 30%
Percentage of each of the other criteria in the area concerned	≤ 30%	≤ 30%	≤ 30%

¹⁶ Environment: energy consumption and CO2 emissions - Social/societal: mobility or health/comfort of occupants
- Governance: supply chain management.