

**ESG INVESTMENT POLICY  
(ENVIRONMENTAL, SOCIAL, GOVERNANCE)  
AND  
EXCLUSION POLICY**

## **Introduction**

---

The portfolio management policy of PERGAM is based on an in-depth financial analysis of the businesses in which the company invests. Although the management company does not manage any SRI, Greenfin or Finansol labelled funds to date, we are convinced that the integration of extra-financial criteria, in particular Environmental, Social and/or Governance criteria, completes and improves the relevance of our analyses.

This exclusion policy concerns:

- all of PERGAM's activities and consequently concerns both discretionary management and collective management mandates (direct management or delegated management);
- all types of securities and instruments: shares and/or bonds issued by an excluded company and derivatives whose sole underlying is an excluded company.

### Before investment

Any new investment dossier being considered must meet the requirements set by the exclusion policy. A pre-trade check is therefore carried out before any investment.

### During the holding period

PERGAM monitors the available information. Any new reinvestment must take into account the progress made in the improvement plans in order to reassess whether the ESG risks initially identified have or have not decreased.

## **Excluded sectors**

---

The policy is intended to exclude any investment in issuers that generate more than 20% of their turnover (directly or indirectly) in the following sectors:

### **1. Tobacco**

This decision reflects our desire not to engage even in legal activities with proven negative effects on physical and moral health and the risk of addiction.

PERGAM will not invest in the tobacco industry, including manufacturers and wholesalers of cigarettes, tobacco, electronic cigarettes and related products.

### **2. Pornography**

Pergam does not wish to be involved in pornographic activities, even legal ones. Pergam will therefore not invest in companies whose main activities are the manufacture or distribution of pornographic content.

### **3. Coal**

This decision reflects our commitment to combating climate change and managing energy transition. PERGAM will not invest in companies whose main activities are coal mining and the production or sale of coal-based energy.

#### 4. **Armaments**

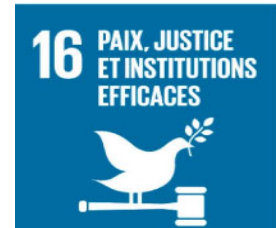
In accordance with the law, companies involved in the manufacture of or trade in anti-personnel mines and cluster bombs (the exclusions following the ratification by France of the 1997 Ottawa and the 2008 Oslo treaties) as well as chemical, biological and depleted uranium weapons are also excluded.

Our commitments are reflected in the vigilance of our portfolios with regard to the securities of issuers on this exclusion list. These provisions apply to investments in issuers that generate more than 20% of their turnover (directly or indirectly) in one of the above sectors. Funds managed by PERGAM that invest in other funds may have indirect exposure to issuers that do not strictly comply with the above criteria.

### **Contribution to Sustainable Development Goals (SDGs)**

---

Our exclusion policy allows us to contribute in our own way to the following sustainable development objectives:



3: Good health and well-being: To ensure healthy lives and promote well-being for all at all ages.

13: Mitigation has the goal of significantly limiting CO<sub>2</sub> emissions and thus reducing climate risks in the future.

16: Peace, Justice and Strong Institutions: Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels

### **Identification of issuers and updating**

---

In order to guarantee the quality and reliability of the information used, PERGAM mainly uses data from the following providers: Sustanalytics, Confluence (ex Statpro Revolution).

The list of exclusions will be reviewed annually according to the evolution of environmental and societal issues. This policy will be updated accordingly.

### **Governance**

---

Governance will be included in the Risk Committee. The permanent members are, in particular, the General Management, the heads of the Risk Management and Compliance functions and the Director of Management. Invitees may include portfolio managers, particularly if one of their portfolios is invested in a company identified as being involved in an activity covered by the exclusion policy.

Updated on: 31/12/2021

*This document may be updated at any time by PERGAM*