Principles for Responsible Investment

ASSESSMENT REPORT

2021 PILOT

ODDO BHF Asset Management

Generated 2022-08-18

ABOUT THIS REPORT

The assessment report is designed to provide feedback to signatories and support ongoing learning and development. The high-level assessment methodology can be found here and question-level assessment criteria can be found after each indicator in the Investor Reporting Framework, here. Note that the 2021 scoring methodology has changed to reflect the new Reporting Framework, and is incomparable with scores from previous PRI years.

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A dataset of medians based on all signatories' scores can be referenced here.

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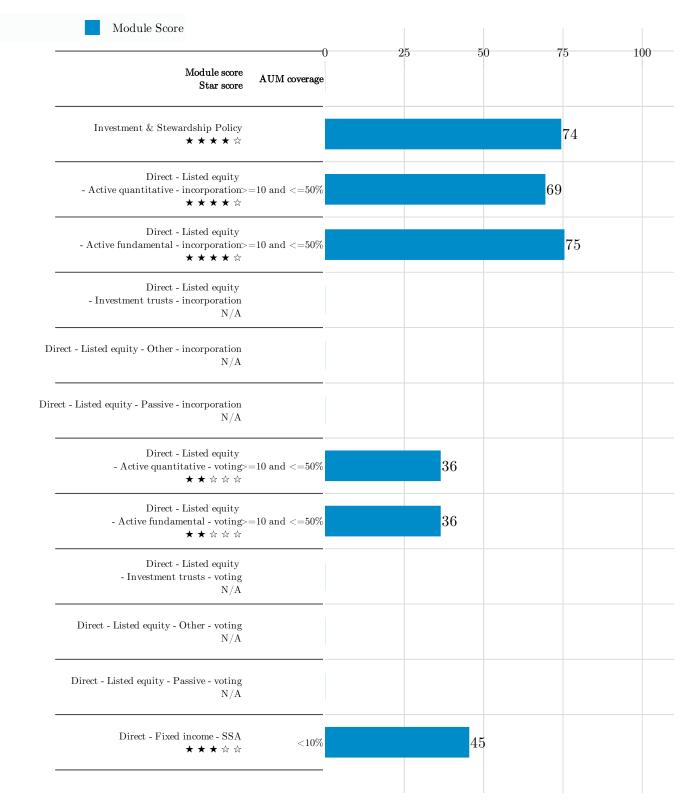
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Summary Scorecard



Summary Scorecard (continued)

| Module Score | | - | | - | 20 |
|--|-----------------|-----|------|------|----|
| Module score Star score | AUM coverage | 5 5 | 50 7 | 5 10 | 0 |
| Direct - Fixed income - Corporate $\star \star \star \Leftrightarrow \Leftrightarrow$ | =10 and <=50% | | 49 | | |
| Direct - Fixed income - Securitised N/A | | | | | |
| Direct - Fixed income - Private debt $$\rm N/A$$ | | | | | |
| Direct - Private equity N/A | | | | | |
| Direct - Real estate N/A | | | | | |
| Direct - Infrastructure N/A | | | | | |
| Direct - Hedge funds - Multi-strategy $$\rm N/A$$ | | | | | |
| Direct - Hedge funds - Long/short equity - incorporation N/A | | | | | |
| Direct - Hedge funds - Long/short equity - voting $$\rm N/A$$ | | | | | |
| Direct - Hedge funds - Long/short credit $$\rm N/A$$ | | | | | |
| $$\rm Direct$ - Hedge funds - Distressed, special situations, and event-driven fundamental $$\rm N/A$$ | | | | | |
| Direct - Hedge funds - Structured credit $$\rm N/A$$ | | | | | |
| | | | | | |

Summary Scorecard (continued)

| | 0 | 25 | 50 75 | 100 |
|--|--------------|----|-------|-----|
| Module score Star score | AUM coverage | | | |
| Direct - Hedge funds - Global macro $$\rm N/A$$ | | | | |
| rect - Hedge funds - Commodity trading advisor $$\rm N/A$$ | | | | |
| Direct - Hedge funds - Other $$\rm N/A$$ | | | | |
| Indirect - Listed equity - Passive $$\rm N/A$$ | | | | |
| Indirect - Listed equity - Active $$\rm N/A$$ | | | | |
| Indirect - Fixed income - Passive N/A | | | | |
| Indirect - Fixed income - Active N/A | | | | |
| Indirect - Private equity $\star \star \star \diamond$ | <10% | | 62 | |
| Indirect - Real estate $$\rm N/A$$ | | | | |
| Indirect - Infrastructure N/A | | | | |
| Indirect - Hedge funds N/A | | | | |

Indicator Level Scores For Direct - Fixed income - SSA

| Section | Sub-section | Topic | Indicator | Your Score |
|--------------------------|--|--|-----------|---------------|
| Pre-investment phase | Materiality analysis | AUM coverage of ESG materiality assessment process | FI 1 | 64/200 |
| Pre-investment phase | Materiality analysis | How ESG is incorporated into materiality assessment process | FI 1.1 | 50/200 |
| Pre-investment phase | ESG risk management | AUM coverage of ESG incorporation in risk management | FI 2.1 | 94/150 |
| Pre-investment phase | ESG incorporation in asset valuation | AUM coverage of ESG incorporation in investment research | FI 3.1 | 57/200 |
| Pre-investment phase | ESG incorporation in portfolio construction | Portion of cases where ESG affected portfolio construction | FI 5.1 | 125/200 |
| Pre-investment phase | ESG incorporation in assessment of issuers | Incorporation of ESG in credit quality analysis | FI 7 | 100/200 |
| Pre-investment phase | ESG performance | Incorporation of relative ESG performance in investment analysis | FI 8 | 48/150 |
| Post-investment phase | ESG risk management | Incorporation of ESG in regular reviews | FI 12 | 112/150 |
| Post-investment phase | ESG risk management | Identification of ESG incidents | FI 13 | 200/200 |
| Post-investment phase | Time horizons | Time frame for which ESG risks taken into account | FI 14 | 0/150 |
| Post-investment phase | Long-term ESG trend analysis | Continuous monitoring of long-term ESG trends | FI 15 | 48/150 |
| Post-investment phase | Thematic bonds | Selection of non-labelled thematic bonds | FI 19 | 100/100 |
| Post-investment phase | Thematic bonds | Escalation strategies used in the majority of cases when thematic bond proceeds are not allocated as promised | FI 20 | 30/150 |
| Reporting/Disclosure | ESG screens | Communication of the side-effects of fixed income screening to clients or beneficiaries | FI 21 | 200/200 |
| Engagement | Engaging with issuers/borrowers | Timing of fixed income engagement | FI 22 | 0/200 |
| Engagement | Sovereign bonds | SSA bonds: non-issuer parties engaged with | FI 23 | 0/150 |

Indicator Level Scores For Direct - Fixed income - Corporate

| Section | Sub-section | Торіс | Indicator | Your Score |
|--------------------------|--|--|-----------|---------------|
| Pre-investment phase | Materiality analysis | AUM coverage of ESG materiality assessment process | FI 1 | 64/200 |
| Pre-investment phase | Materiality analysis | How ESG is incorporated into materiality assessment process | FI 1.1 | 50/200 |
| Pre-investment phase | ESG risk management | AUM coverage of ESG incorporation in risk management | FI 2.1 | 94/150 |
| Pre-investment phase | ESG incorporation in asset valuation | AUM coverage of ESG incorporation in investment research | FI 3.1 | 57/200 |
| Pre-investment phase | ESG incorporation in portfolio construction | Portion of cases where ESG affected portfolio construction | FI 5.1 | 125/200 |
| Pre-investment phase | ESG incorporation in assessment of issuers | Incorporation of ESG in credit quality analysis | FI 7 | 100/200 |
| Pre-investment phase | ESG performance | Incorporation of relative ESG performance in investment analysis | FI 8 | 48/150 |
| Pre-investment phase | ESG risk management | Corporate bonds: coverage of framework for ESG risks at country and sector level | FI 9.1 | 47/150 |
| Post-investment phase | ESG risk management | Incorporation of ESG in regular reviews | FI 12 | 112/150 |
| Post-investment phase | ESG risk management | Identification of ESG incidents | FI 13 | 200/200 |
| Post-investment phase | Time horizons | Time frame for which ESG risks taken into account | FI 14 | 0/150 |
| Post-investment phase | Long-term ESG trend analysis | Continuous monitoring of long-term ESG trends | FI 15 | 48/150 |
| Post-investment phase | Thematic bonds | Selection of non-labelled thematic bonds | FI 19 | 100/100 |
| Post-investment phase | Thematic bonds | Escalation strategies used in the majority of cases when thematic bond proceeds are not allocated as promised | FI 20 | 30/150 |
| Reporting/Disclosure | ESG screens | Communication of the side-effects of fixed income screening to clients or beneficiaries | FI 21 | 30/200 |
| Engagement | Engaging with issuers/borrowers | Timing of fixed income engagement | FI 22 | 64/200 |

Indicator Level Scores For Investment & Stewardship Policy

| Section | Sub-section | Торіс | Indicator | Your Score |
|--|--------------------------------------|--|-----------|---------------|
| Responsible investment policy & governance | Responsible investment policy | Signatories responsible investment policy | ISP 1 | 200/200 |
| Responsible investment policy & governance | Responsible investment policy | Signatories with elements of responsible investment policy | ISP 1.1 | 200/200 |
| Responsible investment policy & governance | Responsible investment policy | Signatories with public responsible policy elements | ISP 2 | 200/200 |
| Responsible investment policy & governance | Responsible investment policy | Coverage of responsible policy elements | ISP 3 | 50/200 |
| Responsible investment policy & governance | Responsible investment policy | Contents of exclusion policy | ISP 4 | 100/100 |
| Responsible investment policy & governance | Responsible investment policy | Coverage of asset specific guidelines on ESG incorporation | ISP 5 | 25/150 |
| Responsible investment policy & governance | Governance | Roles with formal oversight and accountability for responsible investment | ISP 6 | 150/150 |
| Responsible investment policy & governance | Governance | Roles with implementation responsibilities for responsible investment | ISP 7 | 100/100 |
| Responsible investment policy & governance | People and capabilities | Staff objectives for responsible investment practices | ISP 8 | 150/150 |
| Responsible investment policy & governance | People and capabilities | Bonuses for responsible investment practices | ISP 8.2 | 100/100 |
| Responsible investment policy & governance | People and capabilities | Frequency at which staff training for responsible investment is reassessed | ISP 9 | 100/100 |
| Responsible investment policy & governance | Strategic asset allocation | Signatories incorporating ESG factors in strategic asset allocation | ISP 10.1 | 9/150 |
| Stewardship | Stewardship policy | Coverage of stewardship policy | ISP 11 | 33/200 |
| Stewardship | Stewardship policy | Elements of stewardship policy | ISP 12 | 60/150 |
| Stewardship | Stewardship policy implementation | Primary mechanism of stewardship policy | ISP 13 | 150/150 |
| Stewardship | Stewardship objectives | Primary objective of stewardship policy | ISP 15 | 200/200 |
| Stewardship | Stewardship prioritisation | Criteria for prioritising engagement targets | ISP 16 | 67/100 |
| Stewardship | Collaborative stewardship | Positions on collaborative engagement | ISP 18 | 75/150 |
| Stewardship | Escalation strategies | Escalation strategies not used in stewardship | ISP 20 | 150/150 |

Indicator Level Scores For Investment & Stewardship Policy (continued)

| Section | Sub-section | Торіс | Indicator | Your Score |
|---|---|--|-----------|---------------|
| Stewardship | Engaging policymakers | Signatories who engage with public policy makers | ISP 23 | 200/200 |
| Stewardship | Engaging policymakers | Methods used to engage with public policy makers | ISP 23.1 | 100/200 |
| Stewardship | Engaging policymakers | Signatories with governance processes to ensure alignment of political activity with stance on responsible investment | ISP 23.2 | 200/200 |
| Stewardship | Engaging policymakers – Policies | Signatories with policies to ensure alignment of political activity with stance on responsible investment | ISP 24 | 0/200 |
| Stewardship | Engaging policymakers – Policies | Public disclosure of political influence policies | ISP 24.1 | 0/150 |
| Stewardship | Engaging policymakers – Transparency | Disclosure of political influence activities | ISP 25 | 200/200 |
| Climate change | Public support | Signatories publicly supporting the Paris Agreement | ISP 26 | 150/150 |
| Climate change | Public support | Signatories publicly supporting the TCFD | ISP 27 | 150/150 |
| Climate change | Governance | Board oversight for climate-related risks and opportunities [TCFD Governance A] | ISP 28 | 0/200 |
| Climate change | Governance | Management responsibility for climate-related risks and opportunities [TCFD Governance B] | ISP 29 | 200/200 |
| Climate change | Strategy | Time horizon for climate risks and opportunities [TCFD Strategy A] | ISP 30.1 | 200/200 |
| Climate change | Strategy | Climate risks and opportunities identified beyond investment horizon [TCFD Strategy A] | ISP 31 | 50/200 |
| Climate change | Strategy: Scenario analysis | Use of climate scenario analysis | ISP 33 | 0/200 |
| Sustainability outcomes | Set policies on sustainability outcomes | Location of policy on sustainability outcomes | ISP 40 | 200/200 |
| Sustainability outcomes | Set policies on sustainability outcomes | Frameworks referred to in sustainability outcomes policies and processes | ISP 41 | 200/200 |
| Sustainability outcomes | Identify sustainability outcomes | Tools and frameworks used to identify and map activities onto sustainability outcomes | ISP 44 | 200/200 |
| Sustainability outcomes | Identify sustainability outcomes | Levels at which sustainability outcomes are identified and mapped | ISP 44.1 | 150/150 |
| Sustainability outcomes | Identify sustainability outcomes | Processes for identifying most salient sustainability outcomes | ISP 45 | 200/200 |
| Transparency & Confidence-Building Measures | Information disclosed – ESG assets | Information shared regarding ESG products | ISP 46 | 112/150 |

Indicator Level Scores For Investment & Stewardship Policy (continued)

| Section | Sub-section | Topic | Indicator | Your Score |
|---|---|--|-----------|---------------|
| Transparency & Confidence- Building Measures | Client reporting – ESG assets | Information included in regular client reporting for ESG products | ISP 48 | 150/150 |
| Transparency & Confidence- Building Measures | Information disclosed – All assets | Information shared | ISP 49 | 150/150 |
| Transparency & Confidence- Building Measures | Client reporting – All assets | ESG information included in regular client reporting | ISP 50 | 200/200 |
| Transparency & Confidence- Building Measures | Frequency of client reporting – All assets | Frequency of client reporting of ESG information | ISP 51 | 100/100 |
| Transparency & Confidence- Building Measures | Confidence-building measures | Confidence building measures | ISP 52 | 200/200 |
| Transparency & Confidence- Building Measures | Confidence-building measures | Internal audit: coverage | ISP 56 | 96/150 |
| Transparency & Confidence- Building Measures | Confidence-building measures | ESG labels held | ISP 59 | 128/200 |

Indicator Level Scores For Direct - Listed equity - Active quantitative - incorporation

| Section | Sub-section | Topic | Indicator | Your Score |
|--------------------------|---|---|-----------|---------------|
| Pre-investment phase | Materiality analysis | AUM coverage of ESG materiality assessment process | LE 1 | 48/150 |
| Pre-investment phase | Materiality analysis | How ESG is incorporated into materiality assessment process | LE 1.1 | 200/200 |
| Pre-investment phase | Long-term ESG trend analysis | Continuous monitoring of long-term ESG trends | LE 2 | 96/150 |
| Pre-investment phase | ESG incorporation | Coverage of valuation and financial modelling incorporating ESG risks | LE 3.1 | 30/150 |
| Pre-investment phase | Assessing ESG performance | AUM coverage of information used in incorporating ESG in financial modelling | LE 4.1 | 94/150 |
| Pre-investment phase | ESG incorporation in portfolio construction | Portion of cases where ESG affected portfolio construction | LE 6.1 | 94/150 |
| Pre-investment phase | ESG risk management | Compliance processes for negative screening | LE 8 | 200/200 |
| Post-investment phase | ESG risk management | Incorporation of ESG in regular reviews | LE 9 | 150/150 |
| Post-investment phase | ESG risk management | Identification of ESG incidents | LE 10 | 50/100 |
| Reporting/Disclosure | Sharing ESG information with stakeholders | Communication of the side-effects of listed equity screening to clients or beneficiaries | LE 13 | 75/100 |
| Reporting/Disclosure | Sharing ESG information with stakeholders | ESG information included in client reporting | LE 14 | 142/200 |

Indicator Level Scores For Direct - Listed equity - Active quantitative - voting

| Section | Sub-section | Topic | Indicator | Your Score |
|-------------|-----------------------------------|--|-----------|---------------|
| Stewardship | Voting policy | Voting policies | LE 15 | 200/200 |
| Stewardship | Voting policy | Coverage of voting policy | LE 15.1 | 100/200 |
| Stewardship | Voting policy | Guidance on specific ESG issues in voting policy | LE 16 | 38/150 |
| Stewardship | Alignment & effectiveness | Consistency between voting policy and advice from external voting advisors | LE 17 | 100/100 |
| Stewardship | Security lending policy | Securities lending | LE 18 | 0/200 |
| Stewardship | Security lending policy | Voting and securities lending | LE 18.1 | 0/150 |
| Stewardship | Security lending policy | Exclusions in securities lending | LE 18.2 | 0/100 |
| Stewardship | Shareholder resolutions | Stance on shareholder resolutions | LE 19 | 112/150 |
| Stewardship | Pre-declaration of votes | Pre-declaration of votes | LE 20 | 0/150 |
| Stewardship | Voting disclosure post AGM/EGM | Disclosure of voting activities | LE 21 | 64/200 |
| Stewardship | Voting disclosure post AGM/EGM | Time between vote and disclosure of voting activities | LE 21.1 | 112/150 |
| Stewardship | Voting disclosure post AGM/EGM | Coverage of communication of the rationale for voting abstain/against management recommendations | LE 22.1 | 0/150 |
| Stewardship | Voting disclosure post AGM/EGM | Coverage of communication of the rationale for voting abstain/against PRI signatory resolutions | LE 23.1 | 0/100 |

Indicator Level Scores For Direct - Listed equity - Active fundamental - incorporation

| Section | Sub-section | Topic | Indicator | Your Score |
|--------------------------|---|---|-----------|---------------|
| Pre-investment phase | Materiality analysis | AUM coverage of ESG materiality assessment process | LE 1 | 96/150 |
| Pre-investment phase | Materiality analysis | How ESG is incorporated into materiality assessment process | LE 1.1 | 200/200 |
| Pre-investment phase | Long-term ESG trend analysis | Continuous monitoring of long-term ESG trends | LE 2 | 96/150 |
| Pre-investment phase | ESG incorporation | Coverage of valuation and financial modelling incorporating ESG risks | LE 3.1 | 36/150 |
| Pre-investment phase | Assessing ESG performance | AUM coverage of information used in incorporating ESG in financial modelling | LE 4.1 | 94/150 |
| Pre-investment phase | ESG incorporation in portfolio construction | Portion of cases where ESG affected portfolio construction | LE 6.1 | 112/150 |
| Pre-investment phase | ESG risk management | Compliance processes for negative screening | LE 8 | 200/200 |
| Post-investment phase | ESG risk management | Incorporation of ESG in regular reviews | LE 9 | 150/150 |
| Post-investment phase | ESG risk management | Identification of ESG incidents | LE 10 | 75/100 |
| Reporting/Disclosure | Sharing ESG information with stakeholders | Communication of the side-effects of listed equity screening to clients or beneficiaries | LE 13 | 75/100 |
| Reporting/Disclosure | Sharing ESG information with stakeholders | ESG information included in client reporting | LE 14 | 142/200 |

Indicator Level Scores For Direct - Listed equity - Active fundamental - voting

| Section | Sub-section | Topic | Indicator | Your Score |
|-------------|-----------------------------------|--|-----------|---------------|
| Stewardship | Voting policy | Voting policies | LE 15 | 200/200 |
| Stewardship | Voting policy | Coverage of voting policy | LE 15.1 | 100/200 |
| Stewardship | Voting policy | Guidance on specific ESG issues in voting policy | LE 16 | 38/150 |
| Stewardship | Alignment & effectiveness | Consistency between voting policy and advice from external voting advisors | LE 17 | 100/100 |
| Stewardship | Security lending policy | Securities lending | LE 18 | 0/200 |
| Stewardship | Security lending policy | Voting and securities lending | LE 18.1 | 0/150 |
| Stewardship | Security lending policy | Exclusions in securities lending | LE 18.2 | 0/100 |
| Stewardship | Shareholder resolutions | Stance on shareholder resolutions | LE 19 | 112/150 |
| Stewardship | Pre-declaration of votes | Pre-declaration of votes | LE 20 | 0/150 |
| Stewardship | Voting disclosure post AGM/EGM | Disclosure of voting activities | LE 21 | 64/200 |
| Stewardship | Voting disclosure post AGM/EGM | Time between vote and disclosure of voting activities | LE 21.1 | 112/150 |
| Stewardship | Voting disclosure post AGM/EGM | Coverage of communication of the rationale for voting abstain/against management recommendations | LE 22.1 | 0/150 |
| Stewardship | Voting disclosure post AGM/EGM | Coverage of communication of the rationale for voting abstain/against PRI signatory resolutions | LE 23.1 | 0/100 |

| Section | Sub-section | Торіс | Indicator | Your Score |
|-------------|--------------------------------|--|-----------|---------------|
| Selection | Responsible investment policy | Compliance with responsible investment policy - coverage | SAM 2.1 | 112/150 |
| Selection | Research and screening | Manager selection criteria: conduct and capabilities | SAM 3 | 150/150 |
| Selection | Investment practices | Manager selection criteria: investment practices | SAM 4 | 125/200 |
| Selection | Documentation and track record | Review of information in manager selection | SAM 11 | 137/200 |
| Appointment | Pooled funds | Manager appointment for pooled funds | SAM 12 | 125/200 |
| Appointment | Segregated mandates | Contractual requirements in manager appointment for segregated funds | SAM 13 | 125/200 |
| Monitoring | Investment practices | Manager monitoring: investment practices | SAM 14 | 94/150 |
| Monitoring | Review | Manager monitoring: reporting | SAM 20 | 66/100 |
| Monitoring | Engagement and escalation | Manager monitoring: formal grievance processes | SAM 22 | 0/150 |

Indicator Level Scores For Indirect - Private equity