



CANDRIAM'S SRI EMPLOYEE SAVINGS PLAN



European SRI Transparency Code

SRI Employee Savings Plans

Statement of engagement

Sustainable & Responsible Investment holds a key place in the strategic position and philosophy of Candriam. Active in the SRI field since 1996, we have complied with the European Transparency Code since 2009.

This Code – covering the period 2017-2018, and the ninth Transparency Code to whose stipulations we have responded – is applicable to our Core SRI funds. Our complete response to the requirements of the Transparency Code, detailed below, can also be viewed on our corporate website <https://www.candriam.com/en/professional/market-insights/sri-publications/>.

Please note that we have also drafted Transparency codes for:

- Candriam's Core SRI funds, which include open-end SRI funds invested in various asset categories;
- Candriam's SRI Emerging Markets Equity funds, which invest in sustainable & responsible companies in emerging markets;
- Candriam's SRI Index funds, which incorporate SRI criteria into their investment process, in accordance with a dedicated index management strategy;
- Candriam's SRI ETFs, which factor ESG criteria into their investment process.

The responses to the European SRI Transparency Codes for all the above-mentioned funds are available on our corporate website and our dedicated SRI website: <https://www.candriam.com/en/professional/market-insights/sri-publications/>.

Compliance with the Transparency Code

Candriam has undertaken to practise transparency and believes it meets this engagement as best it can in light of the current regulatory and competitive environment in the countries in which it operates.

Candriam complies with all European Transparency Code recommendations.

April 2018

Table of Contents

- 1. General Data3**
 - Portfolio Management Firm3
 - SRI fund or funds (range)..... 13
- 2. Issuer ESG evaluation methodology 16**
- 3. Investment process 30**
- 4. ESG Controls and Reporting 34**
- Appendix..... 36**

1. General Data

Portfolio Management Firm

1a) Give the name of the portfolio management firm in charge of the fund or funds to which this Code applies

The portfolio management firm is Candriam.

Candriam Investors Group.

Avenue des Arts, 58

1000 Brussels – Belgium

Please consult our website for further information: www.candriam.com.

This code applies to the Candriam SRI Employee Savings Plans managed by Candriam.

Any question regarding sustainable and responsible investment (SRI) at Candriam can be e-mailed to the following address: investor.support@candriam.com.

The investment firm's SRI assets under management totalled €30.4 billion, i.e. 27% of total AuM, at end-December 2017.

1b) Describe the portfolio management firm's general approach to the incorporation of environmental, social and governance (ESG) criteria.

Sustainability is rooted in Candriam's operating model and forms a key part of our corporate culture. Our sustainable development strategy leads us to incorporate the overall trends that will shape the world of tomorrow when defining our strategic operational choices. This strategy aims to establish and maintain a balance between, on the one hand, responsible behaviour towards all stakeholders and, on the other, (a) the synergies between our SRI and traditional investment activities, and (b) the determination to run the company in consideration of the Environment and of Society.

We are aware that Candriam's engagement must be present at all decision-making levels. Consequently, our Executive Committee periodically evaluates relevant sustainability-related challenges in order to determine how to best manage our relations with stakeholders and better align our operating model and practices with long-term global challenges.

Does the portfolio management firm's overall approach fit within its Corporate Social Responsibility (CSR) framework?

Being a responsible portfolio management firm does not just boil down to asset management alone. It is about establishing long-term relations with all our stakeholders. Candriam has therefore developed a comprehensive CSR policy covering the following aspects:

European SRI Transparency Code

SRI Employee Savings Plans

- A CSR Steering Committee meets quarterly to monitor the ways in which the CSR action plan is being implemented;
- An annual comparison, based on publicly available information, of Candriam's sustainable development policies and results versus its peers, allows us to put our CSR efforts into perspective.
- An annual Sustainable Development Report highlights the responsible and sustainable initiatives rolled out during the year.

Our first public reports on the company's corporate social responsibilities date back more than ten years. In 2010, we crossed a new threshold, officialising our sustainable development engagement when we began using Key Performance Indicators (KPIs) in our Sustainable Development Report.

You can find our 2016 Sustainable Development Report at the following address:

<https://www.candriam.com/siteassets/medias/publications/brochure/corporate-brochures-and-reports/csr-report/csr2017.pdf>

Candriam is subject to the legal obligations set forth in Article 173 of the French Energy Transition Act through its subsidiary Candriam France. In order to meet these obligations, a special section has been created on our website, where our ESG policy and our range of ESG and Climate solutions are presented, available via the following link:

<https://www.candriam.com/en/professional/market-insights/article-173>

Is the portfolio management firm a signatory of the Principles for Responsible Investment?

Candriam has been a signatory of the PRI since 2006.

As a responsible asset manager, the United Nations Principles for Responsible Investment are an important initiative to support.

We are proud to have been one of the first signatories to the UN-PRI. The PRIs are a voluntary initiative aimed at encouraging investors to include ESG (Environmental, Social & Governance) considerations in their investment decisions.

The most recent version of the PRI Report is available on the SRI website:










<https://www.unpri.org/signatory-directory/>

Is the portfolio management firm a signatory to, or member of, any other international and/or national initiatives supporting SRI practices?

European SRI Transparency Code

SRI Employee Savings Plans

Candriam has undertaken to observe and promote SRI principles, having signed a number of initiatives applicable to its activities as an investment firm:

Statement		Signed in	Status
Principles for Responsible Investment		2006	ongoing
2014 Global Investor Statement on climate Change		2014	ongoing
UNGC Call to Action on anti-corruption		2014	ongoing
Montreal Carbon Pledge		2015	ongoing
G20 Energy Efficiency Investor Statement		2015	ongoing
Paris Pledge for Action		2015	ongoing
UK Stewardship code		2016	ongoing
Investor Statement on ESG credit ratings		2017	ongoing
Adhesion to Green Bond Principles as Investor Member		2017	ongoing

Candriam is also a member of numerous collaborative engagement initiatives designed to encourage – collectively, within investor groups – companies to improve their communications and transparency when reporting the major challenges of sustainable development.

The table below lists the collaborative engagement initiatives we currently support.

European SRI Transparency Code

SRI Employee Savings Plans

Statement	Signed in	Status	Last renewal in
CDP - Carbon Disclosure Project (incl Climate Change, Water and Forest programs) E	2004	ongoing	2017
CDP-CDLI - CDP-Carbon Disclosure Leadership Index E	2010	completed	2012
ISSR EM - Investor Statement on Sustainability Reporting in Emerging Markets E S G	2008	completed	-
ICOS - Investor Collaboration on Oil Sands E	2009	completed	-
Investor Statement on Suicides and Working Conditions at Electronics Manufacturing Facilities S	2010	completed	-
SSE - Sustainable Stock Exchanges E S G	2010	ongoing	2015
AtM Index - Investor Statement on Access to Medicine S	2010	ongoing	2016
COP Global Compact E S G	2011	completed	2014
Labour Standards in the Supply Chain S	2011	completed	-
Hydraulic Fracturing Investor Guide E	2012	completed	-
Investor engagement on environmental risks of shale oil/tight oil E	2012	ongoing	-
Investor Statement Oil Sands E	2012	completed	-
PRI Rio Initiative E S G	2012	completed	-
Invitation to support Access to Nutrition Index Investor Statement S	2013	ongoing	-
Invitation to join collaborative engagement on anti-corruption G	2013	completed	-
Collaborative engagement on labour standards in the agricultural supply chain S	2013	ongoing	2016
Bangladesh Investor Statement S	2013	ongoing	2017
Call for Action - Global Banks & Climate Change E	2014	completed	-
Investor statement about EU conflict mineral due diligence regulation S	2014	ongoing	2015
Final EU Parliament Vote on Conflict Minerals Due Diligence and Reporting Requirements S	2015	ongoing	-
Letter to RSPO on sustainable palm oil practices E S	2015	ongoing	2015
Signature of the follow-up letter addressed to the RSPO board. E S	2015	ongoing	-
Corporate Carbon Footprint Disclosure E	2016	completed	-
CDP - Carbon Action Initiative E	2017	ongoing	-
Fiduciary Duty In the 21st Century Statement E S G	2017	ongoing	-
investor statement to G20 governments on phasing out subsidies for fossil fuels E	2017	ongoing	-
Global Investor Statement on antimicrobial resistance E S	2017	ongoing	-
Engagement on antibiotics overuse in livestock supply chains E S	2017	ongoing	-
Sustainable Protein Engagement E	2017	ongoing	-
Support legislation on corporate ownership transparency G	2017	ongoing	-
Investor statement on Australia Modern Slavery Act S	2017	ongoing	-
Global investor letter to G7 and G20 governments on climate change E	2017	ongoing	-
World No Tobacco Day - Statement S	2017	ongoing	-
Workforce Disclosure Initiative S	2017	ongoing	-
Banking on a Low Carbon Future E	2017	ongoing	-
PRI Coordinated Engagement on CyberSecurity S G	2017	ongoing	-
Engage companies on breaches of OECD Guidelines E S G	2017	ongoing	-
Investor Expectations on Corporate Climate Lobbying E	2017	ongoing	-
RE100 & EP100 Engagement E	2017	ongoing	-
Combating Child Labour in Cocoa - Investor Expectations & Corporate Good Practices S	2017	ongoing	-
Corporate Tax Responsibility G	2017	ongoing	-

European SRI Transparency Code

SRI Employee Savings Plans

Candriam also participates in **sustainable development working groups** within professional and other organisations, in order to raise awareness in the industry of the importance of integrating SRI. This gives us an excellent viewpoint on discussions and trends in today's market. An overview of the main working groups in which we participate is provided below:

	Name of Association	Since	
SRI WORKING GROUPS WITHIN ...	BEAMA	Belgian Asset Managers Association	2002
	AFG	Association Française de la Gestion Financière	2003
	EFAMA	European Fund and Asset Management Association	2010
SEVERAL SOCIAL INVESTMENT FORUMS, SUCH AS	Eurosif	European Sustainable Investment Forum	2003
	Belsif	Belgian Sustainable and Socially Responsible Investment (board member)	2003
	VBDO	Dutch Sustainable Investment Forum	2007
	RIAA	Responsible Investment Association Australasia	2007
	FNG	Forum Nachhaltige Geldanlagen (Germany, Switzerland & Austria)	2010
	SSF	Swiss Sustainable Finance	2014
	FIR	French Sustainable Investment Forum	2014
	FFS	Forum per la Finanza Sostenibile	2015
	UKSIF	UK Sustainable Investment and Finance Association	2016
	USSIF	US Forum for Sustainable and Responsible Investment	2016
SUSTAINABLE DEVELOPMENT INFORMATION CENTERS	ORSE	Observatoire sur la Responsabilité Sociétale des Entreprises: Club Finance	2004
	ABIS	Academy of Business in Society	2005

Has the portfolio management firm defined an ESG engagement policy?

In addition to its support for investor initiatives and participation in working groups to promote SRI, Candriam has also established an ESG engagement policy in the form of direct and individual dialogue with company representatives and an active voting policy. Candriam's issuer engagement activities are integral to ensuring the long-term stability of our investment performances.

The goal is to raise the awareness of companies, to encourage them to think about these issues and adopt transparency and, indirectly, to get them to take responsibility when it comes to certain specific SRI-related themes. Our engagement takes the form of a direct and individual dialogue between our SRI analysts and the representatives of the company (contacts with investors, sustainable development department, etc.) and other stakeholders (trade unions, sector federations, etc.) via conference calls, written exchanges, company visits, meetings with Management, etc. In 2016, Candriam established almost 100 engagement contacts.

Candriam's engagement activities are steered and coordinated by the Sustainable Development Team.

Our engagement policy and engagement activities are outlined in our annual engagement report, available on our website at the following address:

https://www.candriam.com/siteassets/medias/publications/brochure/corporate-brochures-and-reports/engagement-report/engagement-activities_annual-report2016_def2.pdf

European SRI Transparency Code

SRI Employee Savings Plans

Has the portfolio management firm defined a voting policy?

At the end of 2003, Candriam established a voting policy, which has changed over time. This voting policy applies both to traditional portfolio management and SRI portfolio management, and can be summarised by the following major principles:

- One share – one vote – one dividend;
- Equal treatment of shareholders;
- Clear financial information and transparency;
- Accountability and independence of the Board of Directors.

When exercising voting rights on behalf of its clients, Candriam calls on the services of ISS (International Shareholder Services). Once a Shareholders' Meeting has been announced and the agenda published, ISS provides Candriam with its analysis and voting recommendations, in accordance with Candriam's specific voting guidance. Based on ISS' voting recommendations and the information provided by the issuers, the ESG analysts notify Candriam's Operations Department of the votes to be carried out. A designated person from the Operations Department, referred to as a "PVoteur", is responsible for the operational management of the voting process and for coordination between the depositary bank, ISS and the Candriam analysts. Furthermore, Candriam votes in favour of resolutions that uphold the principles of sustainable development.

Unless impossible to do so for operational reasons, voting rights are exercised for all portfolio positions. The full list of company AGMs which we attended can be found in the funds' annual reports. Our voting policy, annual report on the exercise of voting rights plus details of our votes can be seen on our website at these addresses: https://www.candriam.be/siteassets/medias/publications/brochure/corporate-brochures-and-reports/proxy-voting/proxyvotingannualreview2016_def2.pdf

<https://www.candriam.be/en/professional/market-insights/sri-publications/proxy-voting-candriams-votes-2016>

Describe how the portfolio management firm or the group helps promote and spread SRI.

As a pioneer in SRI, Candriam encourages sustainable development on the financial markets by sharing its SRI expertise with its customers, the media and the broader financial community.

We share our expertise by:

- participating in working groups;
- encouraging research initiatives;
- participating in conferences;
- promoting external research;
- distributing SRI funds;
- taking part in customer events and publishing a newsletter.

Candriam encourages internal and external SRI research initiatives. Our SRI and financial analysts jointly produce in-depth research reports which are published on our dedicated SRI website. We share our SRI expertise by regular attendance at key conferences on SRI in Europe and abroad, and are frequently consulted by the press on the subject.

European SRI Transparency Code

SRI Employee Savings Plans

In 2016, our specialists took part in the following seminars and conferences:

- The Giornata Nazionale della Previdenza event in Naples (Italy)
- The Geneva Forum for Sustainable Investing (Switzerland)
- Salone del Risparmio in Milan (Italy)
- Eurosif 2016 Study Launch in Brussels (Belgium)
- The Forum per la Finanza Sostenibile (Italy)
- An SRI roadshow organised jointly with Belfius (Belgium)
- A roundtable and one-to-ones in Zurich (Switzerland)
- Fondsnieuws – Masterclass in Amsterdam (Netherlands)
- Instituut voor Pensioen Educatie in Amsterdam (Netherlands)
- The “Italian Private Banking Association” National Forum (Italy)

External SRI research is promoted through sponsors such as the "Sustainable Finance and Responsible Investment Chair" organised by the AFG (French Financial Management Association).

In October 2017, Candriam launched the Candriam Academy, aimed at raising awareness and informing financial intermediaries about sustainable and responsible investment through an innovative online training platform. The platform offers SRI content as well as free, accredited training programmes. The various available modules provide a broad introduction to socially responsible investment. They are interactive and dynamic, with videos, infographics, surveys and a variety of reports. Each module ends with a video recap and a 10-question multiple-choice questionnaire. A score of 8/10 is required to obtain a certificate for each module.

<https://academy.candriam.com/>

On the sales front, Candriam offers a wide **range of SRI funds**. Various investment classes are available and directed at individual clients (via distribution networks) as well as institutional clients. Sales staff assigned to the different customer segments sell SRI funds in more than 20 countries, depending on marketing authorisations.

Finally, we organise several events throughout the year (such as SRI roadshows) for our institutional clients. We also participate in many events in the distribution networks. These events give us an opportunity to directly explain our SRI strategy to our different customers.

Individual interviews with customers are also organised and educational videos and opinion articles on ESG-related matters are published on our website:

<https://www.candriam.be/en/professional/market-insights/esg>

European SRI Transparency Code

SRI Employee Savings Plans

1c) List the SRI funds and the resources specifically allocated to the SRI activity.

All the funds in Candriam's SRI range are managed in accordance with our SRI methodology.

All the funds comprising our SRI range are listed in the table below:

SRI PRODUCTS			Characteristics											
Process	Asset Class	Fund name	Legal Form	ISIN	Legal Form	Fund domicile	Inception Date	Fund currency	Aum (M) 22/01/2018	Strategies	Investment Type	Geographical zone	Underlyings	
Passive	Equities	Cleome Index EMU Equities		LU1292953335	SICAV	Luxembourg	11/12/2015	EUR	596.98	Totally Blend	Passive	EMU	Direct Lines	
		Cleome Index Europe Equities	SICAV	LU0461106337	SICAV	Luxembourg	11/11/1999	EUR	1,112.06	Totally Blend	Passive	Europe	Direct Lines	
		Cleome Index Pacific Equities		LU1379320754	SICAV	Luxembourg	18/07/2016	EUR	70.05	Totally Blend	Passive	Asia Pacific	Direct Lines	
		Cleome Index USA Equities	SICAV	LU0461105529	SICAV	Luxembourg	28/10/1999	EUR	1,092.81	Totally Blend	Passive	United States	Direct Lines	
		Cleome Index World Equities		LU1292953848	SICAV	Luxembourg	11/12/2015	EUR	179.15	Totally Blend	Passive	World	Direct Lines	
		IndexIQ Factors Sustainable Europe Equity UCITS ETF		LU1603795458	SICAV	Luxembourg	26/06/2017	EUR	160.44	Totally Blend	Passive	Europe	Direct Lines	
		IndexIQ Factors Sustainable EMU Equity UCITS ETF		LU1603797074	SICAV	Luxembourg	26/06/2017	EUR	72.21	Totally Blend	Passive	EMU	Direct Lines	
		IndexIQ Factors Sustainable Japan Equity UCITS ETF		LU1603797587	SICAV	Luxembourg	26/06/2017	EUR	55.12	Totally Blend	Passive	Japan	Direct Lines	
		IndexIQ Factors Sustainable Sovereign Euro Bond UCITS ETF		LU1603794212	SICAV	Luxembourg	26/06/2017	EUR	57.27	Government	Passive	EMU	Direct Lines	
	Bonds	Cordius Index Euro Bonds	SICAV	LU0336614440	SICAV	Luxembourg	08/01/2008	EUR	221.68	Government	Passive	EMU	Direct Lines	
		Cordius Index Euro Corporate Bonds	SICAV	LU0520200931	SICAV	Luxembourg	30/06/2010	EUR	157.14	Corporate Inv. Grade	Passive	World	Direct Lines	
		Cleome Index Euro Corporate Bonds		LU1542321093	SICAV	Luxembourg	31/03/2017	EUR	60.98	Corporate Inv. Grade	Passive	World	Direct Lines	
		Cleome Index Euro Government Bonds		LU1542321929	SICAV	Luxembourg	31/03/2017	EUR	24.58	Government	Passive	EMU	Direct Lines	
		Cleome Index Euro Long Term Bonds		LU1542323032	SICAV	Luxembourg	31/03/2017	EUR	27.19	Government	Passive	EMU	Direct Lines	
		Cleome Index Euro Short Term Bonds		LU1542324352	SICAV	Luxembourg	31/03/2017	EUR	80.94	Government	Passive	EMU	Direct Lines	
		IndexIQ Factors Sustainable Corporate Euro Bond UCITS ETF		LU1603797190	SICAV	Luxembourg	26/06/2017	EUR	58.82	Corporate Inv. Grade	Passive	World	Direct Lines	
		IndexIQ Factors Sustainable Sovereign Euro Bond UCITS ETF		LU1603794212	SICAV	Luxembourg	26/06/2017	EUR	57.27	Government	Passive	Europe	Direct Lines	
		IndexIQ Factors Sustainable Sovereign Euro Bond UCITS ETF		LU1603794212	SICAV	Luxembourg	26/06/2017	EUR	57.27	Government	Passive	Europe	Direct Lines	
Active	Equities	Candriam Sustainable Europe	SICAV	BE0173540072	SICAV	Belgium	02/03/2000	EUR	105.65	Totally Blend	Fundamental	Europe	Direct Lines	
		Candriam Sustainable North America	SICAV	BE0173901779	SICAV	Belgium	02/03/2000	USD	132.46	Totally Blend	Quantitative	North America	Direct Lines	
		Candriam Sustainable Pacific	SICAV	BE0174191768	SICAV	Belgium	02/03/2000	JPY	154.21	Totally Blend	Quantitative	Asia Pacific	Direct Lines	
		Candriam Sustainable World	SICAV	BE0946893766	SICAV	Belgium	20/03/2000	EUR	36.81	Totally Blend	Quantitative	World	Direct Lines	
		Candriam SRI Equity EMU	SICAV	LU1313771187	SICAV	Luxembourg	29/12/2015	EUR	137.51	Totally Blend	Fundamental	EMU	Direct Lines	
		Candriam SRI Equity Europe	SICAV	LU1313771856	SICAV	Luxembourg	29/12/2015	EUR	215.87	Totally Blend	Fundamental	Europe	Direct Lines	
		Candriam SRI Equity North America	SICAV	LU1313772581	SICAV	Luxembourg	29/12/2015	USD	172.94	Totally Blend	Quantitative	North America	Direct Lines	
		Candriam SRI Equity Pacific	SICAV	LU1434526460	SICAV	Luxembourg	07/11/2016	JPY	246.27	Totally Blend	Quantitative	Asia Pacific	Direct Lines	
		Candriam SRI Equity World	SICAV	LU1434527435	SICAV	Luxembourg	20/10/2016	EUR	497.03	Totally Blend	Quantitative	World	Direct Lines	
		Candriam SRI Equity Emerging Markets	SICAV	LU1434523954	SICAV	Luxembourg	20/10/2016	EUR	361.35	Totally Blend	Fundamental	Emerging Markets World	Direct Lines	
		Candriam Epargne Responsable Actions	FCPE	FC20070130	FCPE	France	22/09/2008	EUR	3.00	Large Value	Fundamental	World	FoF - In-house Funds	
		Candriam Sustainable Euro Bonds	SICAV	BE0943361116	SICAV	Belgium	24/06/2004	EUR	121.47	Aggregate	Fundamental	World	Direct Lines	
	Bonds	Candriam Epargne Gestion Obligatoire	SICAV	FR0000994978	SICAV	France	30/03/2000	EUR	5.90	Aggregate	Fundamental	World	Direct Lines	
		Candriam SRI Bond Euro	SICAV	LU1313789447	SICAV	Luxembourg	29/12/2015	EUR	158.92	Aggregate	Fundamental	World	Direct Lines	
		Candriam SRI Bond Euro Corporate	SICAV	LU1313770452	SICAV	Luxembourg	29/12/2015	EUR	388.95	Corporate Inv. Grade	Fundamental	World	Direct Lines	
		Candriam SRI Bond Euro Short Term	SICAV	LU1434521826	SICAV	Luxembourg	14/11/2016	EUR	137.41	Aggregate	Fundamental	World	Direct Lines	
		Candriam SRI Bond Euro Aggregate Index	SICAV	LU1514873949	SICAV	Luxembourg	24/03/2017	EUR	39.80	Aggregate	Fundamental	World	Direct Lines	
		Candriam SRI Bond Global	SICAV	LU1434523012	SICAV	Luxembourg	14/11/2016	EUR	49.93	Aggregate	Fundamental	World	Direct Lines	
		Candriam SRI Bond Global High Yield	SICAV	LU1644441120	SICAV	Luxembourg	05/09/2017	EUR	69.00	Corporate Non Inv. Grade (HY)	Fundamental	World	Direct Lines	
		Candriam SRI Bond Emerging Markets	SICAV	LU1434519416	SICAV	Luxembourg	14/11/2016	USD	86.89	Aggregate	Fundamental	Emerging Markets World	Direct Lines	
		Candriam Sustainable Euro Corporate Bonds	SICAV	BE0945493345	SICAV	Belgium	11/10/2005	EUR	95.40	Corporate Inv. Grade	Fundamental	World	Direct Lines	
		Candriam Sustainable Euro Short Term Bonds	SICAV	BE0945490317	SICAV	Belgium	11/10/2005	EUR	95.57	Aggregate	Fundamental	World	Direct Lines	
		Candriam Sustainable World Bonds	SICAV	BE0945478197	SICAV	Belgium	11/10/2005	EUR	10.54	Aggregate	Fundamental	World	Direct Lines	
		Candriam Epargne Responsable Obligatoire	FCPE	FC20070129	FCPE	France	22/09/2008	EUR	3.78	Aggregate	Fundamental	EMU	FoF - In-house Funds	
		Candriam Epargne Responsable Monétaire	FCPE	FC20070131	FCPE	France	22/09/2008	EUR	5.26	Aggregate	Fundamental	World	FoF - In-house Funds	
		Candriam SRI Money Market Euro	SICAV	LU1434529050	SICAV	Luxembourg	20/10/2016	EUR	377.72	Aggregate	Fundamental	World	Direct Lines	
		Candriam SRI Defensive Asset Allocation	SICAV	LU1644442102	SICAV	Luxembourg	05/09/2017	EUR	133.29	Low	Fundamental	World	FoF - Mixed	
		Asset allocation	Candriam Sustainable High	SICAV	BE0169199313	SICAV	Belgium	20/03/2000	EUR	50.56	High	Fundamental	World	FoF - Mixed
			Candriam Sustainable Low	SICAV	BE0159412411	SICAV	Belgium	20/03/2000	EUR	75.93	Low	Fundamental	World	FoF - Mixed
			Candriam Sustainable Medium	SICAV	BE0159411405	SICAV	Belgium	20/03/2000	EUR	206.46	Medium	Fundamental	World	FoF - Mixed
Candriam Epargne Responsable Diversifié	FCPE		FC20070128	FCPE	France	22/09/2008	EUR	6.05	Medium	Fundamental	Europe	FoF - In-house Funds		
Candriam Epargne Responsable Diversifié Solidaire	FCPE		990000103369	FCPE	France	30/12/2009	EUR	1.25	Medium	Fundamental	Europe	FoF - Mixed		

European SRI Transparency Code

SRI Employee Savings Plans

Candriam launched its first SRI fund in 1996. For more than 20 years now, the company has developed expertise in ESG analysis thanks to its **dedicated team of ESG analysts**, each of whom specialises in a given sector. The team has developed its own ESG analysis methodology applied to governments, corporations and supranational agencies/organisations. **A Sustainable Development Team** focuses on engagement and voting activities, working closely with the ESG Analysis and Research Team. The ESG analysts determine the SRI investment universe for the portfolio managers on the portfolio management teams structured by asset class or product category (mandates/funds). The portfolio managers then apply their respective investment processes and select issuers from this SRI universe. **One or more portfolio managers on each portfolio management team are designed as “SRI Ambassadors.”** The ESG analysts regularly take part in Portfolio Management Committees and a quarterly meeting, attended by the SRI ambassadors and ESG Analysis and Sustainable Development teams, to discuss ongoing projects and exchange ideas on ESG themes.

The SRI analysts use a variety of external information sources, including the following extra-financial rating agencies: MSCI-ESG Research, Vigeo-Eiris, ISS-Ethix and Trucost.

Rating Agencies	Certification	Scope	Type of screening	Link
MSCI-ESG Research	-	International companies	- ESG criteria - controversial activities - Norms-based criteria	http://www.msci.com/
		International companies : corporate governance	Corporate Governance	
Vigeo-Eiris	Arista	European companies	- ESG criteria - controversial activities - Norms-based criteria	http://www.vigeo.com/csr-rating-agency/fr
		Governments - World	ESG criteria	
ISS-Ethix	-	Emerging market companies	Norms-based criteria	http://www.ethix.se/
		International companies	Screening criteria used to exclude the weapons industry	
Trucost	-	International companies	Environmental data: Greenhouse gas emissions, energy mix, percentage of exposure to fossil fuels, scenario 2 degrees	http://www.trucost.com/

Other sources of information, such as academic experts, sector federations, the media and NGOs are also used.

These external sources form an information database, but Candriam's SRI analysts then apply their own analysis methodology to the issuers under review.

Finally, Candriam has an SRI Expert Committee made up of 3 independent members with the following responsibilities:

- ensuring the relevance of the SRI analysis methodology and the consistency of its application;
- identifying emerging issues in SRI;
- helping to guide the company's SRI strategy.

The committee consists of:

- Beat Bürgenmeier, Professor of Economics at the University of Geneva, Head of the Centre of Human Ecology and Environmental Sciences
- Gilbert Lenssen, Professor of Management at Leiden University
- Gérald Pachoud, Senior Policy Advisor, Pluto & Associates, Geneva

European SRI Transparency Code

SRI Employee Savings Plans

1d) Describe the content, frequency and resources used by the portfolio management firm to inform investors about the ESG criteria taken into account

Relevant information concerning SRI is communicated to the public via our website (<http://candriam.com/>), which describes our SRI activities and addresses themes such as the results of our SRI analyses, changes to our SRI investment process and certain specific SRI themes. Several publications, including educational videos and research and discussion documents, are available in our online library.

SRI fund or funds (range)

1e) Give the name of the fund or funds to which this code applies, along with their main features

The code applies to the following funds¹, managed by Candriam:

SRI Products		Characteristics					SRI ANALYSIS					
Asset Class	Fund name	Geographical focus	ISIN	Legal Form	risk class	Strategy / Capitalisation	Companies			Countries		Supranationals
							Best-in-Class	Norms-based	Controversial activities	Best-in-class	Mission Statement	Norms-based
Equities	Candriam Epargne Responsable Actions	World	FCE20070130	FCPE	6	Large Value	●	●	●			
Bonds	Candriam Epargne Responsable Obligataire	EMU	FCE20070129	FCPE	3	Aggregate	●	●	●	●	●	●
Money Market	Candriam Epargne Responsable Monétaire	World	FCE20070131	FCPE	1	Aggregate	●	●	●	●	●	●
Balanced	Candriam Epargne Responsable Diversifié	Europe	FCE20070128	FCPE	6	Medium	●	●	●	●	●	●
	Candriam Epargne Responsable Diversifié Solidaire	Europe	990000103369	FCPE	5	Medium	●	●	●	●	●	●

1f) What is (are) the objective(s) of including ESG criteria for this or these fund(s)

Through its SRI engagement, Candriam considers that a company's long-term value is not solely influenced by financial criteria such as income or growth in the operating margin. By incorporating environmental, social and governance (ESG) criteria, we identify other factors liable to influence a company's value and competitiveness over the medium and long term, which are not always immediately obvious in traditional financial analyses. External factors such as CO2 costs or health and safety standards affect most companies and issuers, either positively or negatively, when integrated into their economic model. Some factors offer a new opportunity while others are considered a threat to the business model.

Accordingly, the inclusion of ESG factors rounds out the assessment of risks incurred by issuers. These risks can be broken down into four categories:

- Operational risk: risk of losses stemming from a failure or inadequacy in an institution's procedures, staff, internal systems or due to external events.
- Reputational risk: risk of loss in enterprise value stemming from the materialisation of a risk, affecting the perception of the company held by its clients, shareholders, counterparties, regulators or investors.
- Strategic risk: risk of losses stemming from an actual or potential risk, affecting capital and profit, and resulting from changes in business model or adverse commercial decisions, a lack of responsiveness to a market development, or the inappropriate implementation of decisions.
- Financial risk: risks arising from banking and financial activities, predominantly including foreign exchange, interest rate and liquidity risks.

More specifically, climate change is a source of financial and reputational risk for investors. There are two types of climate risks: physical risks and risks associated with a transition to a low-carbon economy.

Physical risks

Physical risks cover immediate material and financial aspects, as well as operational aspects (e.g. production halts, water scarcity) and reputational aspects (e.g. conflicts with local populations, major migratory flows).

¹ Note that the list of funds provided in this table may contain UCITS not registered in your jurisdiction and may therefore not be available to you. We invite you to visit our website (<http://candriam.com/>) to find out whether or not the funds are available in your country. Click "Funds" in the main menu and enter the name of the fund you wish to find. If the fund appears in the results, it is available in your country. If it does not appear in the results, it is not available in your country.

European SRI Transparency Code

SRI Employee Savings Plans

Transition risks

Searching for solutions to climate change issues can generate risks and opportunities for some sectors/companies.

In particular, these risks cover:

- Changes in prices of energy resources and energy efficiency, with the added drawback of leaving companies with stranded assets:
 - Reduction of renewable energy costs, and increase in supply of renewable energies, have driven down demand for the highest-polluting energies (with coal in the lead);
 - Reserves of the highest-polluting energies may end up never being used, forcing the owners to write them off.
- Changes in anti-pollution tax systems and more restrictive carbon markets, driving up prices of CO2 per metric ton;
- Financing risk for companies active in high-polluting sectors or involved with obsolete energy activities;
- This risk has arisen due to the growing preference of clients and other stakeholders for energy transition financing and associated risks.

Type of Risks

RISKS	OPERATIONAL	REPUTATION	STRATEGIC	FINANCIAL
Physical risks	✓	✓		
Transition risks - asset value			✓	
Transition risks - legal and market constraints	✓		✓	✓
Transition risks - financing/funding		✓		✓

Climate Risks

To help investors manage the risks associated with climate change and to take advantage of the opportunities presented by the transition to a low-carbon economy, Candriam offers investment solutions such as

- Excluding exposure to coal or the highest-polluting activities
- “Low-carbon” solutions
- Investment in companies offering solutions for the energy transition
- Investment in green bonds.

European SRI Transparency Code

SRI Employee Savings Plans

These investment solutions are offered after reviewing the portfolio in terms of carbon footprint/exposure to fossil fuels and the portfolio's exposure profile in terms of energy mix with respect to the 2-degree global warming scenario. These solutions are developed in accordance with the financial risk/reward targets specific to the portfolio under analysis.

For more information, visit our website <https://www.candriam.com/en/professional/market-insights/article-173>

The following SRI approaches are applied in the course of the analysis of the ESG criteria:

- The Best-in-Class approach aims at selecting the top issuers (companies or governments) in each sector based on their ability to meet sustainable development challenges.
- The Norms-based approach verifies the company's or government's compliance with the main international treaties.
- Controversial Activities screening aims at excluding companies involved in the manufacture and/or sale of weapons and other controversial activities from our SRI investment universe.

At Candriam, the inclusion of ESG criteria is the first step in the responsible investment process. Candriam's SRI analysis is designed to select those issuers that best manage the challenges related to sustainable development, including climate change and energy transition. All these issuers form the SRI universe. The investment portfolios are then compiled from this SRI universe and in accordance with analysts' recommendations. This rigorous investment process ensures that short-, medium- and long-term ESG and financial risks and opportunities are taken into account and thus adds value to the investment as it enables the selection of issuers best positioned both from a financial point of view and from a sustainable-development point of view.

2. Issuer ESG evaluation methodology

2a) What are the basic principles on which the ESG analysis methodology is based?

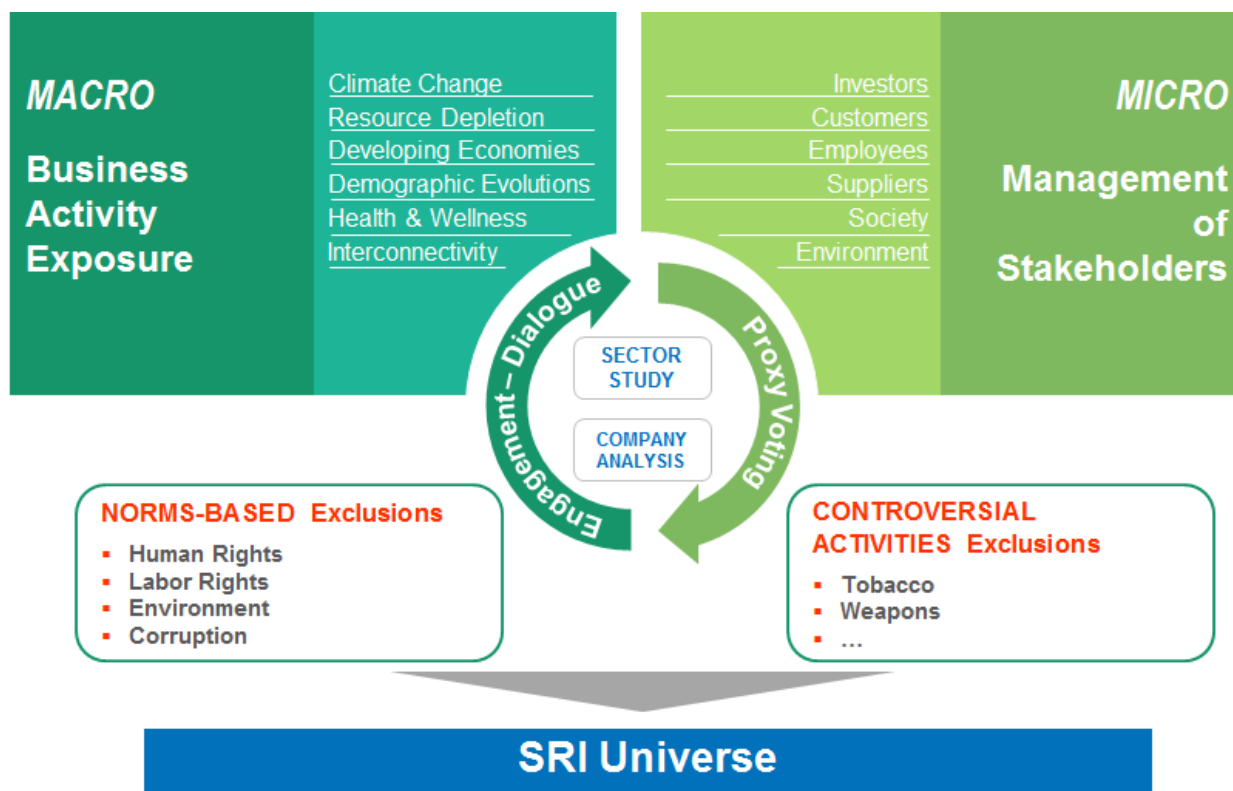
Candriam defines SRI as the incorporation of environmental, social and governance (ESG) criteria in investment decisions.

In order to take into account the stakes and challenges specific to each issuer in terms of ESG, Candriam has developed an internal SRI analysis process by type of issuer:

- companies issuing equities and/or bonds;
- countries, i.e., public bond issuers such as public organisations²;
- supranational organisations issuing bonds.

2a-1 – Basic principles of SRI analysis for companies issuing equities and/or bonds

In the interest of selecting the most socially responsible companies in each sector, Candriam has established a structured and rigorous three-step SRI analysis procedure as shown in the diagram below:



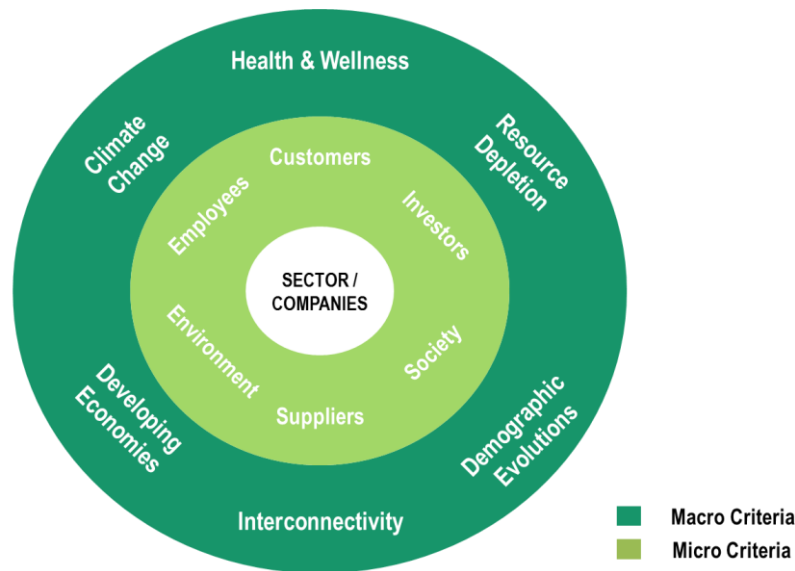
² The group of public issuers comprises public organisations at several administrative levels, ranging from local to national/federal institutions. We apply the "top-of-the-pyramid" rule when selecting these institutions: if the SRI analysis of a country is positive, then all public organisations in that country will be deemed eligible, and thus considered to be socially responsible public issuers.

European SRI Transparency Code

SRI Employee Savings Plans

- **Best-in-Class Analysis**

The **Best-in-Class Analysis** of companies consists in evaluating their ability to manage the sustainable development issues specific to their sector. These are addressed from two separate, but related, perspectives, namely, from a Macro-Analysis, and from a Micro-Analysis, perspective.



Macro-Analysis evaluates the company's exposure (services/products, production areas, market segments, etc.) to the **major sustainable development challenges**. These challenges are long-term trends liable to considerably influence the economic environment in which companies operate and to determine the future challenges in the market as well as the long-term growth opportunities.

Candriam has identified six major challenges: Climate Change, Resource Depletion, Demographic Evolution, Interconnectivity, Health and Wellness, and Developing Economies.

Micro-Analysis evaluates a company's ability to incorporate **stakeholder** (customers, employees, etc.) **interests** into its long-term strategy, insofar as they are a source of risks and opportunities for the company.

- **Norms-Based Analysis**

Secondly, Candriam performs a **norms-based analysis** of each company. The purpose of this analysis is to determine whether the company is observing the principles of the United Nations Global Compact. These principles cover four main categories: Human Rights (HR), Labour (L), Environment (ENV) and Anti-Corruption (COR), as defined below:

European SRI Transparency Code

SRI Employee Savings Plans

Area	Principles
Human Rights	Businesses should: <ol style="list-style-type: none"> 1. Support and respect the protection of internationally proclaimed human rights; and 2. Make sure that they are not complicit in human rights abuses.
Labour Standards	Businesses should: <ol style="list-style-type: none"> 3. Uphold the freedom of association and the effective recognition of the right to collective bargaining; 4. Eliminate all forms of forced and compulsory labour; 5. Abolish the child labour; 6. Eliminate discrimination in respect of employment and occupation.
Environment	Businesses should: <ol style="list-style-type: none"> 7. Support a precautionary approach to environmental challenges; 8. Undertake initiatives to promote greater environmental responsibility; and 9. Encourage the development and diffusion of environmentally friendly technologies.
Anti corruption	Businesses should: <ol style="list-style-type: none"> 10. Work against corruption in all its forms, including extortion and bribery.

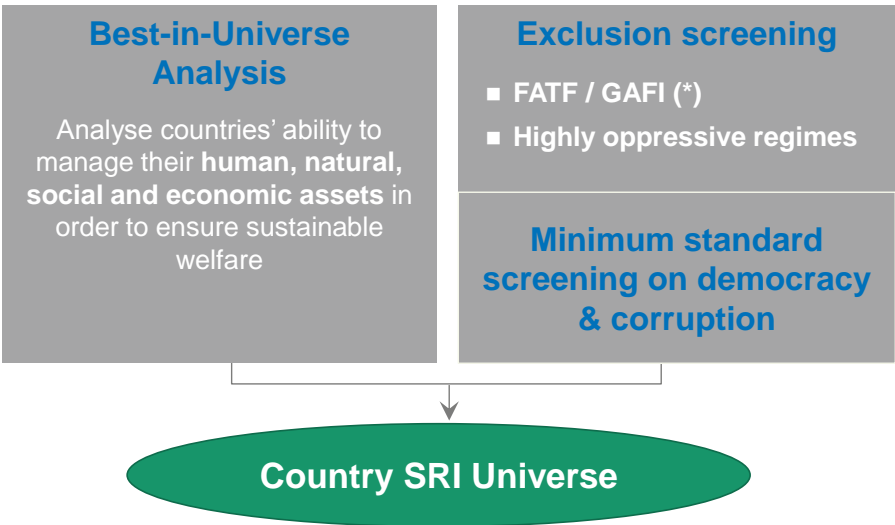
- **Verification of exposure to the weapons industry and other controversial activities**

The verification of exposure to the weapons industry and to any other controversial activities is the last step in the SRI analysis of each company.

This step consists in evaluating the company's involvement in the weapons industry and other controversial activities involving, for example, adult content, alcohol, gambling, GMOs, nuclear power, animal testing or thermal coal as well as activities exercised in oppressive regimes.

2a-2 – Basic principles of SRI analysis for countries, i.e. public bond issuers such as public organisations and others

In the interest of selecting the most sustainable and responsible public issuers, Candriam has established a structured and rigorous 2-step SRI Best-in-Universe analysis procedure as shown in the diagram below :



European SRI Transparency Code

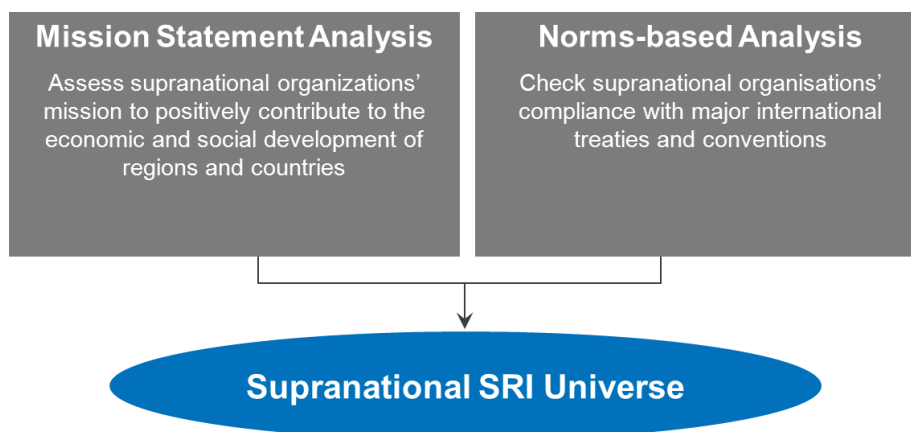
SRI Employee Savings Plans

The purpose of the **Best-in-Universe Analysis** is to evaluate each country's ability to properly manage their sustainable development matters. This means ensuring the well-being of the population and economic prosperity without compromising the ability of future generations to benefit from the same. To this end, the approach is based on the belief that investing in human capital (work, knowledge and health), while properly managing natural resources and social capital (legislation, institutions and social cohesion) and ensuring economic sustainability allows the country to develop sustainably, which, in the long term, generates economic growth and actively promotes social well-being.

Furthermore, the analyst team carries out a minimum standard screening on democracy and corruption for each country. Finally, countries are excluded from the SRI universe if they do not comply with Financial Action Task Force (FATF/GAFI) recommendations or when they are considered as a highly oppressive regime or when they support highly oppressive regimes.

2a-3 – Basic principles of SRI analysis for supranational organisations issuing bonds

In the interests of selecting the most socially responsible supranational organisations, Candriam has established a structured and rigorous 2-step SRI analysis procedure as shown in the diagram below:



The purpose of the **Best-in-Class Analysis** is to exclusively select supranational organisations whose mission makes a positive contribution to the economic and social development of regions and countries. Most of today's supranational organisations meet this condition due to the very nature of their activities. In other words, the large majority successfully pass our screening process.

We also perform a **norms-based analysis** of supranational issuers. With respect to companies, the purpose of this analysis is to determine whether or not the supranational organisation observes the 10 principles of the United Nations Global Compact and, more specifically, the 4 main categories: Human Rights (HR), Labour (L), Environment (ENV) and Anti-Corruption (COR), as defined above.

This analysis aims to eliminate supranational organisations that significantly and repeatedly fail to observe any of the 10 basic principles.

2b) What internal and external resources are used to conduct this analysis?

Please refer back to question 1c)

2c) What are the main ESG analysis criteria?

2c-1 – Analysis criteria for companies issuing equities and/or bonds

- **Best-in-Class Analysis**

The Macro-Analysis and Micro-Analyses used in the Best-in-Class Analysis of companies each include two sections: a sector review and an analysis of each company within its sector.

For the **Macro-Analysis**, the SRI analysis determines whether there are relevant correlations between the sector activities (products offered, geographic location, etc.) and the 6 major sustainable development challenges (Climate Change, Resource Depletion, Demographic Evolution, Interconnectivity, Health and Wellness, and Developing Economies).

For the **Micro-Analysis**, the SRI analysis evaluates the material risks and opportunities arising from the sector's interactions with its stakeholders (Customers, Employees, Investors, the Environment, Suppliers and Society). Relations with the six categories of stakeholders are assessed through an analysis of 14 sub-categories covering 32 themes, as shown in the table below.

Stakeholder Domains	Sub-Domains	Themes
Employees	Employability	<i>Diversity & discrimination</i>
		<i>Training & career management</i>
	Staff relations	<i>Responsiveness to change</i>
		<i>Dialogue with employees</i>
Working Conditions	<i>Work time & flexibility</i>	
	<i>Remuneration</i>	
	<i>Health & safety</i>	
Customers	Commercial practices	<i>Anti-competitive practices</i>
		<i>Commercial behaviour</i>
	Quality & safety assurance	<i>Quality & safety assurance</i>
Suppliers	Sustainable relationships	
	Practices of suppliers	<i>Working practices of suppliers</i>
		<i>Environmental practices of suppliers</i>
Investors	corporate governance	<i>Board accountability</i>
		<i>Audit & reporting</i>
		<i>Investors' right</i>
	Sustainable outlook	<i>Remuneration</i>
		<i>Sustainable governance</i>
Society	Process-related social impacts	<i>Sustainable business modes</i>
		<i>Long-term profitability</i>
	Product-related social impacts	<i>Community Interactions</i>
	Public authority relations	<i>Site safety/security</i>
Environment	Process-related impacts	<i>Access to products/services</i>
		<i>Public authority relations</i>
		<i>Water consumption & emissions</i>
		<i>Energy & climate change</i>
	Product-related impacts	<i>Other atmospheric emissions</i>
		<i>Land use & biodiversity</i>
	<i>Raw materials & waste</i>	
	<i>Use</i>	
	<i>Disposal & recycling</i>	

A single category can be represented by different indicators, depending on their relevance to the sector in question. For example, the category "health and safety" of employees is primarily assessed by looking at safety conditions on oil platforms in the Energy sector, whereas, in the Software sector, it would be assessed by looking at workplace stress and ergonomics indicators.

- **Norms-Based Analysis**

The norms-based analysis determines whether a company is complying with the 10 principles of the United Nations Global Compact.

After identifying any breaches of the Global Compact principles, the analysis uses several parameters to evaluate the severity and magnitude of the breaches:

- temporal proximity: when did the incident happen and how long did it last?
- magnitude: what financial costs and environmental damage are related to the incident?
- credibility: does the incident involve allegations, legal proceedings, etc?
- recurrence: is this a one-off incident or is there proof of repeated incidents over a given period?

Emphasis is also placed on a company's response when an incident occurs. A company that takes positive, responsible measures to ensure that such a breach does not happen again is considered more favourably than a company that does not acknowledge its responsibility and/or does not take any corrective measures.

- **Verification of exposure to the weapons industry and other controversial activities**

A company's exposure to controversial activities is evaluated according to several parameters covering the following variables:

- **Type of involvement**: the type of involvement (direct or indirect) is taken into account for each company evaluated (owners and operators, manufacturers and producers, retailers and suppliers, product suppliers or providers of support services, etc.);
- **Degree of involvement**: this is based on an approach in terms of level of involvement and applied to all types of controversial activities. Production capacities or income stemming from such activities are generally used as key indicators.
- **Responsible policy**: in addition to the type and degree of involvement, it is important to look at how the company addresses and perceives its potentially controversial activities. Consequently, the presence (or absence) of an appropriate, targeted responsible policy is critical to the purpose of this analysis. This type of policy acknowledges the company's involvement in a controversial activity, but also the existence of systems and practices designed to ensure that the activity is carried out responsibly.

However, any companies exposed to the **weapons industry** are permanently excluded from the SRI universe if:

- they are involved in the manufacture or sale of anti-personnel mines, cluster bombs, depleted uranium weapons and/or chemical, nuclear or biological weapons, regardless of the income generated;
- more than 3% of their revenues is generated from the manufacture or sale of conventional weapons.

The exclusion thresholds for exposure to **other controversial activities** are shown in the table below:

European SRI Transparency Code

SRI Employee Savings Plans

Controversial Activities	Exclusion threshold
Activities in oppressive regimes	<ul style="list-style-type: none">■ Large presence in highly oppressive regimes■ Revenues > 1%
Adult content	<ul style="list-style-type: none">■ Revenues > 5%
Alcohol	<ul style="list-style-type: none">■ Revenues > 10% without any responsible policy
Gambling	<ul style="list-style-type: none">■ Revenues > 5%
Nuclear	<ul style="list-style-type: none">■ Revenues > 30%
Tobacco	<ul style="list-style-type: none">■ Revenues > 5%
Thermal coal	<ul style="list-style-type: none">■ Revenues from coal extraction > 0%■ Revenues from power generation > 10 %
Animal testing	<ul style="list-style-type: none">■ Responsible policy if no legal requirement■ Breaches to legislation
Genetic modification	<ul style="list-style-type: none">■ Revenues > 10%

For more details, please refer to Candriam's Controversial Activities policy, which can be viewed on our website: <http://candriam.com>

2c-2 – Analysis criteria for countries, i.e. public bond issuers such as public organisations and others.

- **Best-in-Universe Analysis**

CANDRIAM's country ESG screening aims at analyzing countries' ability to manage their **human, natural and social assets**, as well as their **economic activity**, in such a way as to ensure their present welfare without compromising the ability of future generations to ensure their own welfare, including economic prosperity.

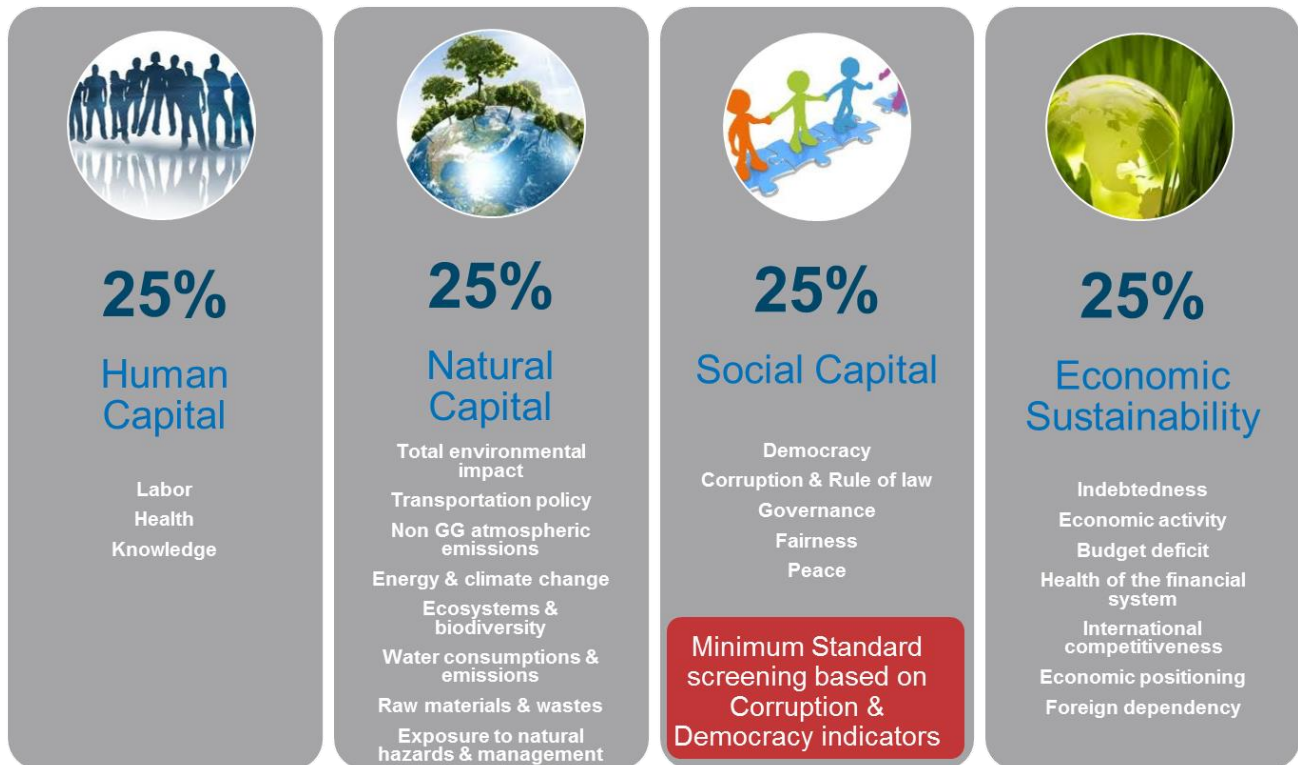
CANDRIAM's country ESG analysis assesses whether each country is following a development path which is sustainable in the mid-term to the long run. In this way, it is a "capital-based approach", as, for each country, it

European SRI Transparency Code

SRI Employee Savings Plans

reviews a comprehensive list of indicators with the purpose of assessing the human, natural, social and economic “capital” of a country at the present moment, as well as over time. Hence CANDRIAM’s country ESG analysis consists of both a present and dynamic assessment of countries’ respective capital.

CANDRIAM’s country ESG analysis compares countries against each other, indicator by indicator, with the aim of identifying countries’ strengths and weaknesses relative to their peers. For each country, its performance over each indicator is aggregated into a single score, which synthesizes the country’s level of sustainability with regard to its peers. CANDRIAM’s ESG analysis of countries is therefore a relative scoring of the degree of sustainability of a country’s development path, in comparison with other countries.



2c-3 – Analysis criteria for supranational organisations issuing bonds

- **Analysis of the definition of objectives**

Most supranational organisations have general-purpose missions and do not usually undermine the principles of sustainable development.

- **Norms-Based Analysis**

The norms-based analysis of supranational organisations follows the same methodology as used in the analysis of companies.

Please refer back to Point 1 of question 2c).

2d) What is the methodology for analysing and evaluating ESG criteria (construction, evaluation scale, etc.)?

2d-1 – SRI analysis methodology for companies issuing equities and/or bonds

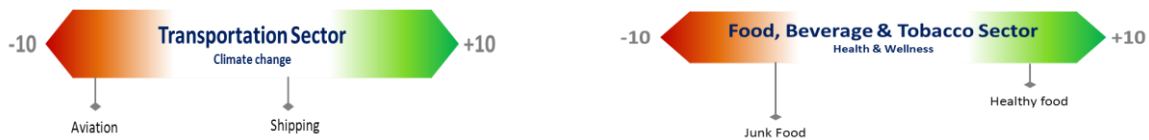
- **Best-in-Class Analysis**

As described in the answer to question 2c, the Best-in-Class analysis of companies includes both a **Macro-Analysis** and a **Micro-Analysis** phase.

1. **Macro-Analysis**

During the Macro-Analysis review of the sector, the analysts determine groups of companies with similar characteristics or business models (activity, geographic location, products/services, etc.) in a given sector. Next, they determine whether or not these groups are exposed to the major relevant challenges of their sector and how this is reflected (positively or negatively) in each of the 6 sustainable development challenges. For each relevant challenge, the impact is evaluated on a scale from -10 to +10.

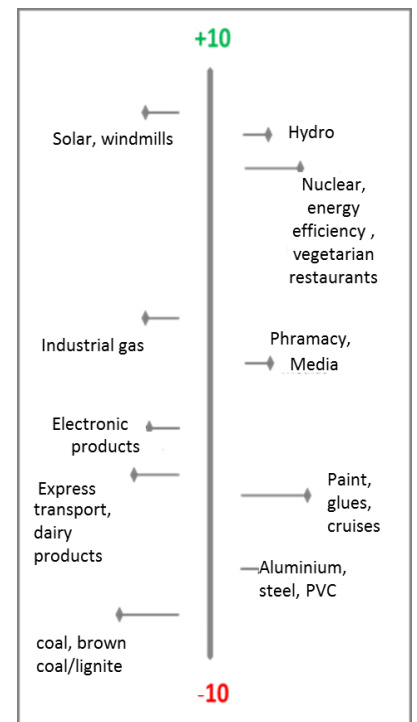
For example, looking at the "Climate Change" challenge in the Transport sector, aviation would receive a more negative score than shipping, whereas, if we look at the "Health and Wellness" challenge in the Food sector, healthy food would receive a positive score while junk food would receive a negative score.



Based on the conclusions of the sector Macro-Analysis, all the company's exposures to the major sustainable development challenges specific to its sector are evaluated and scored. For each company, a Macro score is the sum of the 6 scores given for each major sustainable development challenge, ranging from -60 to +60. A negative score reflects the company's negative exposure to these major challenges while a positive score reflects positive exposure.

Assessment of the climate change challenge

Climate change is considered to be a major and substantial challenge in sustainable development. Accordingly, it is assessed in all sector models and is a major source of risk (thus attributed a negative score) for high-impact sectors such as energy, transport and materials. In the course of this assessment, the impact of various activities is estimated and factors in greenhouse gas emissions from the source to final consumption (i.e. Scopes 1, 2 and 3). Based on this estimate, the impacts for each activity are ranked, as described opposite, on a scale from -10 to +10. The measurement of the impact itself is based on the company's exposure, according to revenue earned by the activity, except for the energy and utilities sectors, where it is based on fossil fuel reserves and installed capacity, respectively.



2. Micro-Analysis

During the **Micro-Analysis** review of the sector, the material risks and opportunities arising from interactions with stakeholders are evaluated.

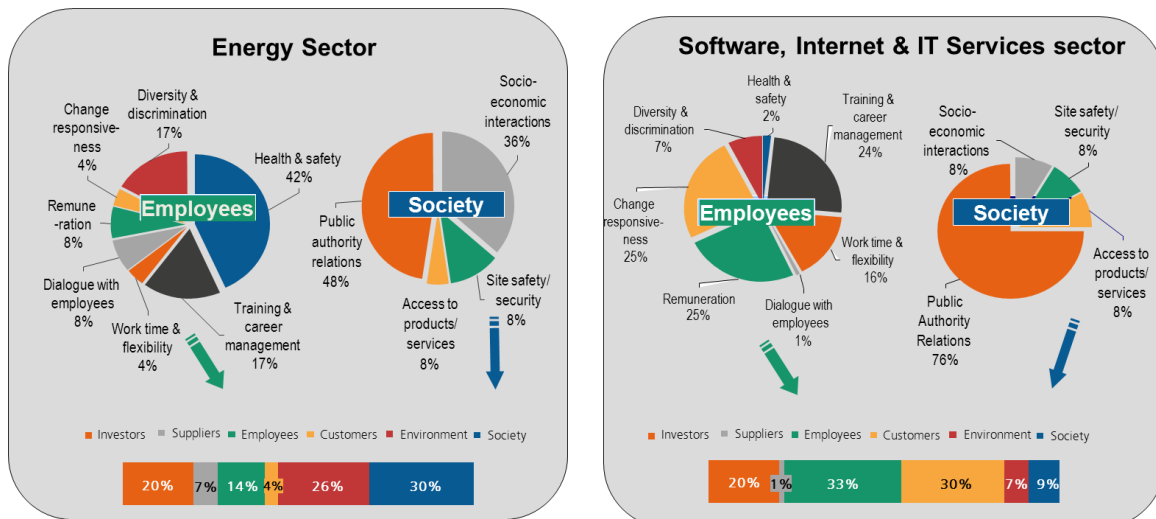
In order to build the model for the Micro-Analysis of the sector, the SRI analysis determines the relevance (weighting) of the various themes for the sector in question. Based on qualitative sector data and, where possible, on historical quantitative data, the relevance of each category is determined according to the frequency of interactions, their financial impact and future prospects.

- Frequency: the frequency of occurrence of certain events, such as accidents, fines, legal disputes or the publication of information briefs, and the degree of attention paid to stakeholders;
- Financial impact: the magnitude of the impact of an SRI issue on, for example, sales, margins and assets (tangible and intangible);
- Future prospects: the probability that the relevance of an issue will increase or decrease due to a change in frequency or financial impact over the next five years.

Once the relevance of each category is determined, weightings for each category and sub-category, as well as the relationship with the stakeholder, can be defined.

The following two examples³ illustrate relevant, stakeholder-related themes :

- In the model for the Energy sector, the most important relations are those with the Environment and Society; in the model for the Software sector, relations with Employees and Customers are predominant;
- In "relations with employees", "health and wellness" is most important for the Energy sector, versus a weighting of 2% for the Software sector, for which "change management" and "remuneration" have the highest weightings.



For each theme addressed, the SRI analysis evaluates the strategies implemented by the company (relevance of the strategy developed, human and material resources allocated, pro-activity and follow-up) as well as the company's performances in each category relative to its competitors and the major trends in the sector.

³ Corporate governance (investor relations) is assigned a weighting of 20% in all sector models.

European SRI Transparency Code

SRI Employee Savings Plans

The combination of this evaluation and the weightings for each category of stakeholder relations obtained from the sector Micro-Analysis give the overall Micro score (weighted average of the six individual stakeholder relations scores) for each company. The company's score ranges from 0 to 100

Management of Environmental relations

Exposure to environmental management risks and opportunities is especially significant for high-impact sectors such as energy, materials, utilities, automotive and real estate. In the course of analysing environmental management, other issues such as air pollution are also covered, including: energy use, biodiversity, soil use, waste and recycling, water consumption and the environmental impact of products.

Examples in the Energy sector

- Strategies implemented
 - Environmental impact of new projects before launch;
 - Projects in renewable energy, energy efficiency;
 - Variable pay granted to executive managers based on environmental performances;
 - Technologies and measures used to prevent leaks in oil pipelines (fibre optic cables to detect leaks, pressure monitoring).

- Performances
 - Energy mix and CO2 emissions;
 - Oil leakage rate < sector average;
 - Gas flaring rate < sector average;
 - High % of OHSAS 14001-certified sites.

- Norms-Based Analysis

If the SRI analysts identify any breaches of the principles of the Global Compact, and depending on their magnitude, a colour code (green, orange, red) is assigned to each company for each of the main categories: Human Rights (HR), Labour (L), Environment (ENV) and Anti-Corruption (COR).

Information regarding actual, suspected and/or related incidents or breaches of international standards are collected through external research combined with internal analyses performed by our SRI analysts. Based on this information and in accordance with the evaluation framework described above, the colour code is determined as follows for each of the four main categories.

European SRI Transparency Code

SRI Employee Savings Plans

Green	- No evidence of repeated or significant violations of the Global Compact principles
Orange	- Evidence of repeated violations of the Global Compact principles but these do not appear to be significant; or - Evidence of significant violations of the Global Compact principles but these do not appear to be repetitive; or - Evidence of repeated and significant violations of the Global Compact principles, but the company has taken appropriate corrective measures/actions
Red	- Evident of repeated and significant violations of Global Compact principles and the organisation has no appropriate response/behaviour

For an issuer to be able to successfully negotiate the norms-based analysis filter, it must not have been attributed “red” in any of the four fields. This filter eliminates up to 4% of the companies analyzed. The companies are permanently controlled and continuously updated.

- **Verification of exposure to the weapons industry and other controversial activities**

As described above for question 2c), companies exceeding the tolerated involvement threshold are excluded from our SRI universe.

2d-2 – Analysis methodology for countries, i.e. public bond issuers such as public organisations and others

The Best-in-Universe Analysis of countries focuses on how each country manages its human, natural and social capital as well as how it ensures its economic sustainability. In our analytical tree, these four pillars are broken down into 23 sub-categories, which are in turn divided into 75 themes (see question 2c-2 for further details).

The four pillars of the Best-in-Universe Analysis for countries are equally weighted. Within each pillar, the weighting of the sub-categories is based on their cross-disciplinary impact throughout the entire evaluation.

Our country-evaluation process includes an assessment of two aspects of each theme: government strategy and performance:

- *Strategy*: governments are evaluated in terms of the engagements and policies they implement to meet their engagements (creation of institutions, definition of policies, allocation of budgets).
- *Performance*: country performances are evaluated over time and relative to other countries. Countries can either develop and strengthen the assets making up their portfolio or weaken them or (at worst) destroy them.

The Human Capital domain aims at identifying countries that have the best human productivity potential, through assessing how healthy and knowledgeable its population is, as well as the extent to which its population is provided employment opportunities (e.g., the participation rate).

For instance, indicators used within this domain are: the proportion of a country’s labour force holding a tertiary education degree, the employment-to-population (15-64 years old) ratio and the proportion of death caused by communicable diseases.

Under **the Natural Capital domain**, we analyse how well a country is managing its own natural resources and a country’s contribution (positive or negative) to global efforts to mitigate major environmental issues such as climate

European SRI Transparency Code

SRI Employee Savings Plans

change, the destruction of ecosystems and the loss of biodiversity, the unsustainable use of water resources, the depletion of raw materials and the intensive generation of waste.

Examples of indicators used within this domain are: carbon dioxide emissions per capita, the share of renewable energy in total energy consumption, the proportion of threatened animal species and total freshwater withdrawal in proportion of a country's internal resources.

Within **the Social Capital domain**, CANDRIAM's country ESG analysis evaluates how well a country's civil society and institutions of a country are functioning. To do so, the analysis assesses, inter alia, how democratic a country's political system is, how prone to corruption it is, the extent to which the rule of law is enforced, whether its institutions provide an effective and business-friendly environment, whether the wealth is shared on a reasonably equitable basis, and whether the country's population enjoys a safe living environment.

A few notable indicators used within this domain are: the World Press Freedom Index from Reporters Without Borders, the number of crimes per hundred thousand inhabitants, the proportion of firms exposed to bribe payment requests over the past year, the World Bank CPIA quality of public administration rating, and the Ease of Doing Business Index.

The Economic Sustainability domain makes a general assessment of a country's economic fundamentals and detects potential threats to each country's economic base. In doing so, it assesses the permanence of the financing that drives all the sustainability policies found under the Human Capital, Natural Capital and Social Capital domains.

Past cases have shown that a country with poor economic fundamentals cannot maintain a high level of human capital, natural capital and social capital in the long term. Over the piece, the ability of a country to implement ambitious sustainability policies requires a sound economy.

Examples of the indicators used within this domain are: budget deficit as a proportion of the GDP, the central government debt as a proportion of the GDP and the debt service payments (principal + interest) as a proportion of export earnings., etc.

Candriam uses a safeguarding mechanism for countries that perform insufficiently with respect to a limited number of topics that are considered to be particularly sensitive: democracy and corruption.

Democracy and corruption were selected as particularly sensitive topics on the grounds that it appeared unacceptable to finance dictatorial governments and/or governments in which public finances are being extensively embezzled away from the public policies they were intended to fund.

For countries that perform poorly with regard to these two topics, a specific penalty is applied directly on their Social Capital score. Since the Social Capital Score is one of the four domains used to calculate a country's final score (accounting for 25% of the final score), this penalty indirectly degrades the final scores of these countries. In conclusion, this specific penalty effectively addresses the potential funds' exposure to both actual dictatorships as well as highly corrupted countries that are plagued by public money embezzlement issues.

The screening methodology results in a scoring model and each country is allocated a score from 0 to 100.

2d-3 – SRI analysis methodology for supranational organisations issuing bonds obligations

In order to be eligible for the SRI universe, supranational organisations must have a mission that complies with the principles of sustainable development and not have committed any major systematic breaches of the principles of the United Nations Global Compact.

A "red" colour code in any of the four major categories of the Global Compact results in exclusion from the SRI universe.

2e) How often is the ESG evaluation reviewed?

Each sector and country is periodically analysed by assessing the evolution of sustainability trends, as well as the relevance and materiality of each model or framework used.

The goal is to ensure that the Best-In-Class models used by the analysts optimally reflect the sustainable development risks and opportunities affecting the sector in question. As companies are continuously being monitored, they are subject to frequent updates within the framework of the Best-In-Class Sector Model.

If there is a major event that may affect the rating assigned to a company (i.e. merger and acquisition, scandal, sustainability controversy etc.) or country (i.e. war, natural disaster, coup d'Etat, etc.), the SRI analyst will launch an alert on the issuer.

There are several types of alerts that can be considered:

- SRI Monitoring Alert (for information only): This alerts explains how the SRI team assessed the incident or controversy, even if there is no immediate change in the decision about the company's eligibility.
- SRI Alert: This alert means that the portfolio manager will no longer be able to add to his position in this issuer. The output of an SRI Alert can be:
 - An immediate change in the final decision on the company's eligibility criteria (from "eligible" for an SRI portfolio to "non-eligible"). In this case the portfolio manager must sell the position within a 3-months period.
 - No immediate change in the final decision on the company's eligibility, but there is a high probability that there will be a change in the near future following the result of the analysis. No immediate selling is required. Within the following three months of the alert, the company will be reviewed according to the new information. A longer period for the revision is allowed when justified by objective reasons, such as, ongoing dialogue with the company or awaiting the result of a lawsuit.

The country-analysis methodology described in this code has been amended in the last 12 months, following the extension of scope to emerging market countries.

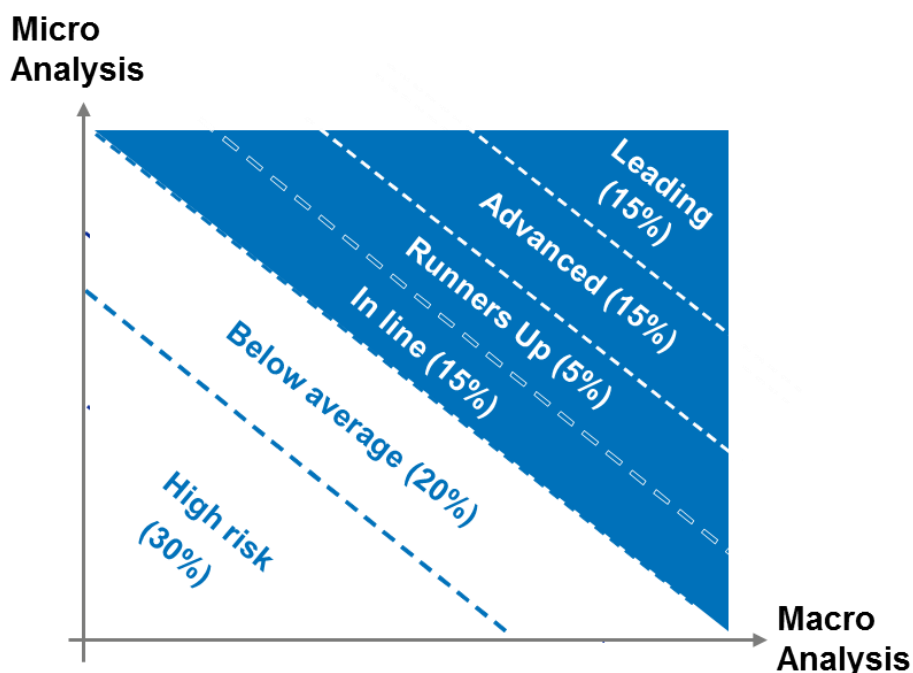
3. Investment process

3a) How are ESG criteria incorporated into the definition of the eligible investment universe?

3a-1 – Definition of the eligible investment universe for companies issuing equities and/or bonds obligations

The SRI universe consists of all the companies that have successfully passed the phases of: Best-in-Class Analysis, Norms-Based Analysis and Controversial Activities exclusion screening.

Based on their combined Macro and Micro scores, companies in each sector are positioned on a chart, as shown below:



The companies with the best positioning through their Macro and Micro scores make up the Best-in-Class universe and can be included in SRI portfolios.

The Best-in-Class universe consists of the top 50% of the best-positioned companies.

With respect to the High Yield strategy, the Best-in-Class universe comprises the top 70% of the best-positioned companies.

After verification of their compliance with the principles of the United Nations Global Compact, just 3% of analysed companies are excluded.

On average, about 2% (8% in the case of high-yield issuers) of the companies that have successfully negotiated the Best-in-Class and Norms-Based analysis phases fail the Controversial Activities screening phase. Most of these exclusions occur when verifying exposure to the weapons industry.

Our Best-in-Class selection of companies assesses the goods and services offered and environmental practices applied to the entire value chain. We select companies actively working to use relatively non-polluting energy sources and steer clear of others, while avoiding the trap of sectors inherently exposed to risks (such as the nuclear sector).

European SRI Transparency Code

SRI Employee Savings Plans

With this approach, we are able to offer an ESG selection that reduces the carbon footprint of our portfolios by 30-40% compared to the benchmark.

3a-2 – Definition of the eligible investment universe for public bond issuers such as public organisations and others

Only issuers having successfully passed the country screening procedure are eligible for inclusion in the final country universe.

Based on our SRI analysis of countries, each country is allocated a score between 0 and 100. Developed countries with an SRI score lower than 50 are excluded from the SRI country universe, as are Emerging countries with a score lower than 35.

Finally, countries are excluded from the SRI universe if they fail to comply with Financial Action Task Force (FATF/GAFI) recommendations or when they are considered a highly oppressive regime or as supportive of highly oppressive regimes.

FATF recommendations (www.fatf-gafi.org) are recognized as the international standard for combating money laundering and the financing of terrorism and proliferation of weapons of mass destruction.

The screening applied to identify countries that are considered a highly oppressive regime or as supportive of highly oppressive regimes is based on the World Bank Voice & Accountability Index and on the Freedom House Freedom report in the World Index.

3a-3 – Definition of the eligible investment universe for supranational organisations issuing bonds obligations

All supranational organisations whose mission has been validated and which have passed the norms-based screening process are included in the SRI universe.

3b) How are ESG criteria included in the portfolio construction process?

Candriam's SRI investment process is a two-step process that first of all calls for the definition of the eligible investment universe, followed by a financial selection from within this eligible universe.

The financial selection of issuers from within this SRI universe is based on financial analysis and the optimal management of risks and of the portfolio.

Any investment outside the SRI universe is prohibited.

The selection of SRI issuers is confirmed by the SRI analysis team on a monthly basis, and on a one-off basis in exceptional circumstances. When there is a change in the SRI universe and an issuer is excluded, the approach consists in excluding this issuer from the SRI portfolios within a period of 3 months, depending on market conditions (very rare exceptions may be granted in order to accommodate a potential liquidity problem).

The Risk Management department ensures that all securities in the portfolios comply with the SRI universe.

At present, even though investors are not systematically informed of disinvestments for SRI reasons, they are covered by the comments in the quarterly fund reports published on the company's website. Please refer to question 4b) below for further details on available documents.

3c) Is there an ESG engagement policy specific to this fund or funds?

Candriam's engagement policy, as described in question 1b) and presented in the SRI Engagement Report (available on Candriam's website: https://www.candriam.be/siteassets/medias/publications/brochure/corporate-brochures-and-reports/engagement-report/engagement-activities_annual-report2016_def2.pdf) applies to all funds covered by this Code.

3d) Is there a voting policy specific to this fund or funds that incorporates ESG criteria?

Candriam's voting policy applies to all the funds covered by this Code.

3e) Do(es) the fund(s) practise securities lending/borrowing?

The SRI funds do not practise securities lending/borrowing.

3f) Do(es) the fund(s) use derivatives?

Depending on the investable asset classes and within the limits defined by the approved prospectus, SRI portfolios may use derivatives, as defined below. The general principle on the use of derivatives is that short positions via derivatives can only be used to cover long positions. No net short positions are authorized, except in exceptional cases where adequate hedging cannot be achieved due to lack of instrument coverage.

For all derivative transactions, the fund is required to use as counterparty, only those financial institutions that comply with the principles of the United Nations Global Compact, as described in Section 2c of this Code at the time of the transaction.

- Interest rate futures: management of the funds in question involves the regular use of interest-rate futures based on government bonds belonging to the SRI universe, in order to adjust the portfolio's duration (upward or downward) across the different segments of the yield curve. These transactions are limited by the legal rules applicable to funds subject to the European Directive, i.e., to 100% of the fund's assets (including other derivatives). As the underlying is included in the SRI universe, there is no impact on the fund's ESG quality.

- Interest-rate swaps: management of the funds in question may involve the use of interest-rate swaps in order to trade a fixed rate for a variable rate, if the counterparty belongs to the SRI universe. These transactions are limited by the legal rules applicable to funds subject to the European Directive, i.e., to 100% of the fund's assets (including other derivatives). As the underlying is included in the SRI universe, there is no impact on the fund's ESG quality.

- Equity swaps: these transactions are permitted, provided that the index or basket of shares meets the criteria of the SRI universe.

- Credit derivative indices: management of the funds in question may involve the temporary use of credit-derivative indices, in cases where the funds must quickly adjust their exposure to the markets. These positions are temporary (max one week) and are limited to 10% of the fund's assets.

- Credit Default Swaps (CDS): the funds in question may use CDS on an SRI issuer in the portfolio if the counterparty to the transaction is a financial institution that also belongs to the SRI universe. As both the issuer subject to the CDS and the counterparty to the transaction belong to the SRI universe, these transactions have no impact on the fund's ESG quality.

European SRI Transparency Code

SRI Employee Savings Plans

- Equity index futures: management of the funds in question may involve the temporary use of equity index futures, in cases where the funds must quickly adjust the portfolio's exposure to the equity markets. These positions are temporary (max one week) and are limited to 10% of the fund's assets.
- Forwards: forwards are exclusively used to quickly adjust the portfolio's exposure to foreign exchange risk in the event of strong market fluctuations or a major change in the portfolio's composition. These transactions, which have no impact on the fund's ESG quality, have to be done with a credit institution that is part of the SRI universe.
- Listed options / OTCs on individual equities or on bond issuers: these options are valid provided the issuers is in the SRI universe.

3g) Are any of the fund's or funds' assets invested in unlisted organisations of significant social utility?

None of the assets comprising the SRI funds covered by this Code are invested in unlisted organisations of significant social utility.

4. ESG Controls and Reporting

4a) What are the internal and/or external procedures implemented to ensure the portfolio's compliance with the ESG rules defined in section 3 of the code?

At Candriam, several departments are in charge of internal control: risk management, internal audit and compliance.

Each department is independent of the Fund Management Department and is placed directly under the authority of Candriam's Executive Committee.

The risk management department ensures that the securities making up the portfolios comply with the SRI universe.

One of the tools used by this department is the constraints server, a tool that combines all the constraints and limits required to manage the investment funds. It contains regulatory and contractual constraints as well as internal limits and constraints used to prevent operational errors. Constraints are applied, for example, to:

- the SRI investment universe;
- the list of authorised investments;
- the potential ratios (liquidity, dispersion) defined;
- the main regulatory constraints applicable to the fund;
- the "list of credit warnings" and "list of equity warnings".

Once the constraints have been configured in the constraints server, any order entered by the portfolio manager is immediately checked against them before the order is sent to the markets (**ex-ante control**). The portfolio manager is alerted in the event of a breach of constraint.

The Internal Audit Department carries out inspections and subsequently advises as necessary to ensure the performance and effective implementation of the internal control system in force. The inspection missions represent the lion's share of the audit department's work and aim to provide the Executive Committee with an objective and independent assessment of a particular domain (function, process, system, ...). In this context, the application of the SRI methodology and its application in the SRI portfolio management process are regularly monitored by internal audit.

As external consultant, Deloitte makes sure that all positions in, or transactions carried out on, the funds correspond to the SRI universe as defined, while taking into account the authorised period in the event of changes in the SRI universe.

4b) What media are used to communicate on the SRI management of the fund or funds?

The documents and information on our SRI funds address the ESG quality of the portfolio via:

- the fund's investment strategy;
- the eligible investment universe, based on the ESG quality described in the strategy;
- the selection of the biggest securities in the portfolio, as described in the fund report.

European SRI Transparency Code

SRI Employee Savings Plans

Details of the securities in the portfolio are also available on our corporate website, in dedicated product sheets, in the “Search for a Fund” section;

All core SRI funds are described on the corporate website via the fund-search engine:
<https://www.candriam.com/en/professional/funds-search/#/sri=true>

The SRI Engagement Report can be viewed at the following link:

https://www.candriam.com/siteassets/medias/publications/brochure/corporate-brochures-and-reports/engagement-report/engagement-activities_annual-report2017.pdf

The Proxy Voting Annual Review can be viewed at the following link:

<https://www.candriam.com/siteassets/medias/publications/brochure/corporate-brochures-and-reports/proxy-voting/proxyvotingannualreview2017.pdf>

Details of votes cast can be viewed on our website at the following link:

www.candriam.be/en/professional/market-insights/sri-publications/proxy-voting-candriams-votes-2016/

<https://www.candriam.com/en/professional/market-insights/sri-publications/proxy-voting-candriams-votes-2017/>

The Sustainable Development Report can be viewed at the following link:

<https://www.candriam.be/siteassets/medias/publications/brochure/corporate-brochures-and-reports/csr-report/csr2017.pdf>

For any request on research available to investors/savers or the breakdown of the securities in the portfolios, please contact Investor.support@candriam.com.

Appendix

Definition of SRI terms

SRI (Sustainable & Responsible Investment)

Application of sustainable development principles to investment. An approach consisting in simultaneously and systematically incorporating environmental, social and governance (ESG) criteria in addition to the usual criteria. The approach can take multiple forms based on positive selection, exclusion, or both, and – where applicable – including criteria for dialogue with issuers.

Sustainable development

“Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.”⁴ This concept includes at least three pillars: economic, social and environmental.

ESG criteria (Environment / Social / Governance)

- **Environmental pillar:** designates the direct or indirect impact of an issuer's activity on the environment.
- **Social/Societal pillar:** relates to the direct or indirect impact of an issuer's activity on stakeholders, with reference to universal values (human rights, international labour standards, anti-corruption, etc.).
- **Governance pillar:** all the processes, regulations, laws and institutions that influence how a company is run, administered and controlled. It also includes the company's relations with its various stakeholders and the objectives governing the company. Stakeholders mainly include shareholders, Management and the Board of Directors.

Engagement

Investor activity (investors such as pension funds, insurance companies and portfolio management firms) aimed at influencing the behaviour of a company over the medium and long term, by highlighting the importance of including environmental, social and governance criteria. This activity also covers individual or collective dialogue with companies, the voting practices of managers and the submission of resolutions proposed at General Shareholders' Meetings.

CSR (Corporate Social Responsibility)

Application of sustainable development principles to the company. Voluntary incorporation of environmental, social and governance (ESG) considerations, above and beyond the usual economic criteria, by companies in their activities and stakeholder relations.

⁴ Brundtland Report, August 1987, World Commission on Environment and Development.

European SRI Transparency Code

SRI Employee Savings Plans

Stakeholders

Any group or individual liable to affect, or be affected by, the achievement of an organisation's objectives. For a company, this term designates all individuals and legal entities (employees, shareholders, customers, suppliers, local authorities, NGOs, trade unions, civil society, etc.) that have direct or indirect links with the company.

* Brundtland Report, August 1987, World Commission on Environment and Development.

Performance Attribution

ESG Quality & ESG Impact Metrics

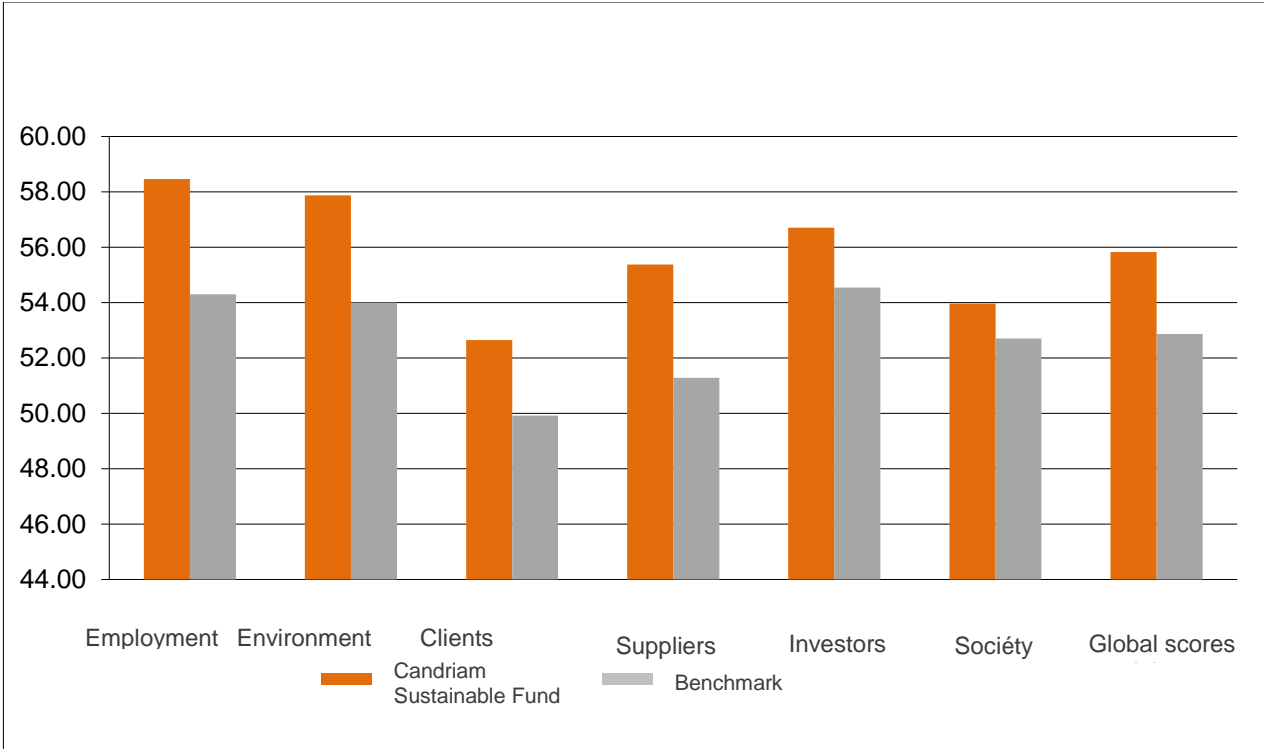
Besides the financial performances, the monthly fund comments pages also disclose quantitative and/or qualitative information with regard to the ESG (Environmental, Social and Governance) quality of our SRI products.

As an active SRI asset manager, we think it important to deliver to our clients transparent reporting on the ESG (Environment, Social and Governance) quality of our SRI products. That's why we have developed a fully-fledged assessment tool that allows us to measure the ESG performance of our SRI funds.

The ESG performance report for our funds is on our website : www.candriam.com/.

The qualitative ESG-performance metrics include a global ESG rating for the portfolio plus two graphs showing the ESG quality of those of our SRI funds that have been subject to our detailed in-house 'Best-in-Class' analysis.

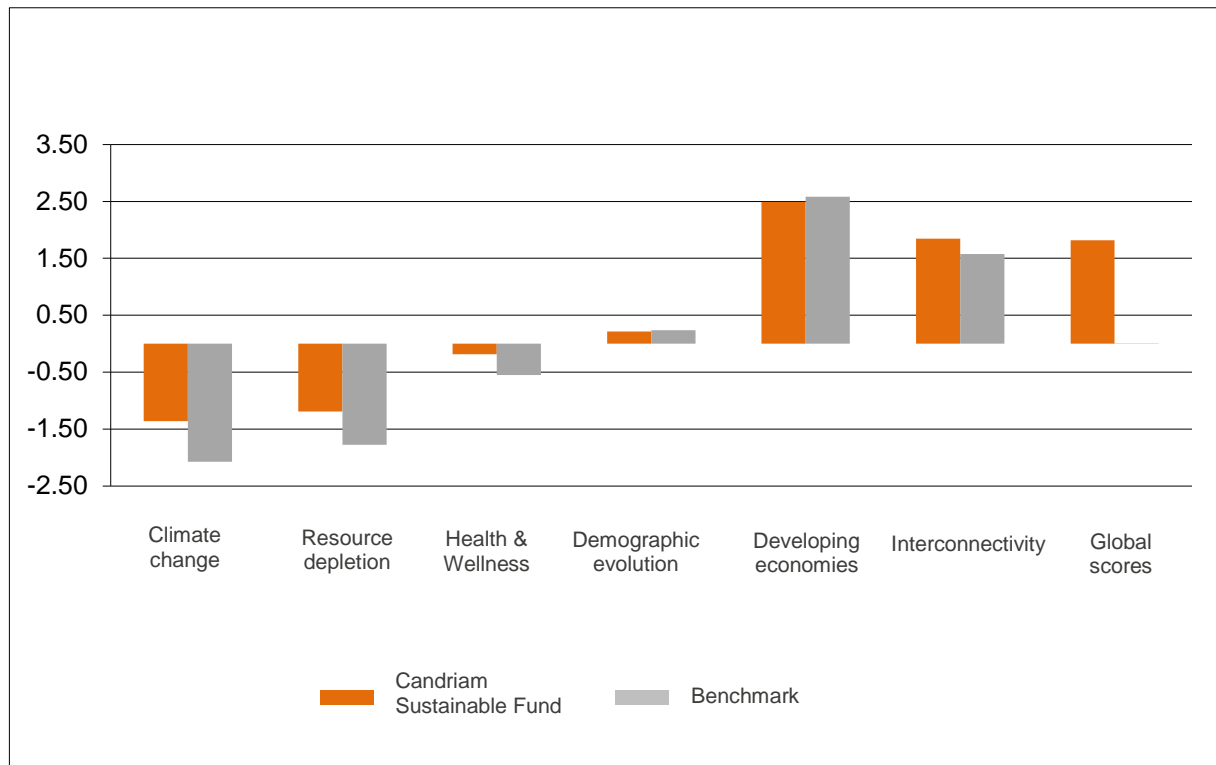
Based on our SRI corporate analysis, as described in section 2 of this Code, the first graph shows the scores resulting from the Micro analysis, i.e. the individual scores for the six stakeholder domains as well as the global aggregated micro-score, for both the SRI fund and its benchmark.



European SRI Transparency Code

SRI Employee Savings Plans

The second graph shows the scores resulting from the Macro analysis, i.e. the individual scores for the six Global Sustainability Trends as well as the global aggregated macro-score, for both the SRI fund and its benchmark.



In addition to the ESG performances of our funds, we also publish ESG impact metrics, covering the 3 pillars of sustainable development.

Environmental Metrics

- Carbon footprint
- Energy mix with respect to the 2-degree global warming scenario
- Water footprint

Social Metrics

- Establishment of goals to improve Occupational Health & Safety performance
- Establishment of Collective Bargaining Agreements

Governance Metrics

- Independence of the Board of Directors
- Significant vote against compensation practices
- Independence of auditors

This assessment is expanded to include two, more qualitative metrics on the impact of ESG selection on the portfolio's ESG performance:

- A metric representing human rights: % of female directors on the Board of Directors
- A metric on compliance with the United Nations Global Compact

European SRI Transparency Code

SRI Employee Savings Plans

All of these metrics are presented for the portfolio and its benchmark. They are an integral part of our SRI Fund Reports and may be consulted on our website <https://www.candriam.fr/fr/professional/recherche-de-fonds/#/sri=true>

For more information on the data sources and calculation methods used, please visit our website: www.candriam.be/nl/professional/marktinzichten/article-173/indicateurs-de-performance-esgclimat/indicateurs-dimpact-esg

The ESG performance of our SRI funds is applicable to equity funds and to the credit bucket of bond funds.



EQUITIES | FIXED INCOME | SRI | ABSOLUTE RETURN | ASSET ALLOCATION



www.candriam.com

This document is provided for information purposes only, it does not constitute an offer to buy or sell financial instruments, nor does it represent an investment recommendation or confirm any kind of transaction, except where expressly agreed. Although Candriam selects carefully the data and sources within this document, errors or omissions cannot be excluded a priori. Candriam cannot be held liable for any direct or indirect losses as a result of the use of this document. The intellectual property rights of Candriam must be respected at all times, contents of this document may not be reproduced without prior written approval.

Candriam consistently recommends investors to consult via our website www.candriam.com the key information document, the prospectus, and all other relevant information prior to investing in one of our funds. These documents are available either in English or in local languages for each country where the fund's marketing is approved.



The European SRI Transparency logo signifies that the Candriam commits to provide accurate, adequate and timely information to enable stakeholders, in particular consumers, to understand the Sustainable Responsible Investment (SRI) policies and practices relating to the fund. Detailed information about the European SRI Transparency Code can be found on www.eurosif.org, and information of the SRI policies and practices of Candriam's SRI funds can be found at: <http://sri.candriam.com>.

The Transparency Code are managed by Eurosif, an independent organisation.

The European SRI Transparency Logo reflects the fund manager's commitment as detailed above and should not be taken as an endorsement of any particular company, organisation or individual.