

# BNP PARIBAS COMFORT FCP



ANNUAL REPORT at 31/07/2023  
R.C.S. Luxembourg K 641



**BNP PARIBAS**  
**ASSET MANAGEMENT**

The sustainable  
investor for a  
changing world



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## Table of contents

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|  | Page |
|--|------|
| Organisation                             | 2    |
| Information                              | 3    |
| Manager's report                         | 4    |
| Audit report                             | 10   |
| Financial statements at 31/07/2023       | 13   |
| Key figures relating to the last 3 years | 14   |
| Securities portfolio at 31/07/2023       |      |
| <i>Bond Fund</i>                         | 15   |
| <i>Equity Dividend Europe</i>            | 16   |
| <i>Sustainable Equity World Plus</i>     | 17   |
| Notes to the financial statements        | 18   |
| Unaudited appendix                       | 25   |

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## Organisation

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### **Registered office**

10 Rue Edward Steichen, L-2540 Luxembourg, Grand Duchy of Luxembourg

### **Board of Directors of the Management Company**

#### ***Chairman***

Mr. Pierre MOULIN, Global Head of Products and Strategic Marketing, BNP PARIBAS ASSET MANAGEMENT France, Paris

#### ***Members***

Mr. Stéphane BRUNET, Chief Executive Officer, BNP PARIBAS ASSET MANAGEMENT Luxembourg, Luxembourg

Mr. Georges ENGEL, Independent Director, Vincennes, France

Mrs. Marie-Sophie PASTANT, Head of ETF, Index & Synthetic Systematic Strategies Portfolio Management, BNP PARIBAS ASSET MANAGEMENT France, Paris

### **Management Company**

BNP PARIBAS ASSET MANAGEMENT Luxembourg, 10 Rue Edward Steichen, L-2540 Luxembourg, Grand Duchy of Luxembourg

BNP PARIBAS ASSET MANAGEMENT Luxembourg is a Management Company as defined in chapter 15 of the amended Law of 17 December 2010 on undertakings for collective investment.

In this capacity, the Management Company is responsible for administration, portfolio management and marketing duties.

Net asset values calculation, transfer and registrar agent are delegated to:

BNP Paribas, Luxembourg Branch, 60 Avenue J.F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg

Portfolio management is delegated to:

#### **Effective Investment Managers**

BNP PARIBAS ASSET MANAGEMENT France, 1 Boulevard Haussmann, F-75009 Paris, France

BNP PARIBAS ASSET MANAGEMENT UK Ltd., 5 Aldermanbury Square, London EC2V 7BP, United Kingdom

#### **Depositary**

BNP Paribas, Luxembourg Branch, 60 Avenue J.F. Kennedy, L-1855 Luxembourg, Grand Duchy of Luxembourg

#### **Auditor**

PricewaterhouseCoopers, Société coopérative, 2 Rue Gerhard Mercator, B.P. 1443, L-1014 Luxembourg, Grand Duchy of Luxembourg

# BNP PARIBAS COMFORT

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## Information

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BNP PARIBAS COMFORT (the “Fund”) is as a Mutual Investment Fund (Fonds Commun de Placement - FCP) created under the Luxembourg law on 28 July 2005 for an indefinite period in accordance with the provisions of Part I of the amended Law of 17 December 2010, (the “law”) relating to UCI.

The Management Regulations of the Fund were filed with the clerk of the district court, where any interested person may consult them or obtain a copy. They were published in the *Mémorial, Recueil Spécial des Sociétés et Associations*, on 15 September 2005. An intermediate version of the Management Regulations was signed on 3 October 2007 and on 13 July 2017. The current version of the Management Regulations was signed on 15 November 2019 with a publication notice in the *Mémorial*.

The complete name BNP PARIBAS COMFORT and the short-name BNPP COMFORT may be used equally in the official and commercial documents of the Fund. The Fund is an umbrella fund, which comprises multiple sub-funds, each with distinct assets and liabilities of the Fund. Each sub-fund shall have an investment policy and a reference currency that shall be specific to it as determined by the Management Company.

Each calculation of the net asset value will be performed under the responsibility of the Board of Directors of the Management Company as follows: the net asset value per unit of each sub-fund, category and/or sub-category will be calculated, unless otherwise stated in book II of the prospectus, for each day of the week on which banks are open for business in Luxembourg (a “Valuation Day”), there is a corresponding NAV which is dated the same day, unless 50% or more of the underlying assets cannot be valued.

It will be calculated in the currencies mentioned in book II of the prospectus for each sub-fund.

As to net asset values and dividends, the Management Company publishes the legally required information in the Grand Duchy of Luxembourg and in all other countries where the units are publicly offered.

The Management Regulations, the Prospectus, the KIID, and periodic reports may be consulted at the Fund’s registered office and at the establishments responsible for the Fund’s financial service. Copies of the Management Regulations and the annual and interim reports are available on request.

Except for the newspaper publications required by Law, the official media to obtain any notice to unitholders from will be the website [www.bnpparibas-am.com](http://www.bnpparibas-am.com).

Documents and information are also available on the website: [www.bnpparibas-am.com](http://www.bnpparibas-am.com).

The financial year begins on 1 August and ends on 31 July.

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## Manager's report

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### Economic context

The hikes in key rates became more frequent after the summer of 2022, despite concerns over global growth. The change in the Chinese authorities' attitude to the health crisis in the autumn was an important milestone, rightly welcomed by investors at the end of 2022, since these authorities seem to be more concerned about growth. From the start of 2023, the instability of the economic consensus led to high volatility across asset classes, in particular bonds, further heightened by two extraordinary events taking place from March onwards. Firstly, difficulties at a number of US regional banks and very limited contagion to a few European banks raised the spectre of a financial crisis. Secondly, the laborious and tense negotiations between the Biden Administration and the Republican-dominated Congress over the US debt ceiling. The risk of a global financial crisis was finally averted thanks to an agreement to suspend the debt ceiling until 2025. The monetary policy tightening cycle is not quite over (although, of course, it is drawing to a close), and central bankers want to be sure that inflation will not accelerate again in the short term. Furthermore, stubbornly high core inflation will encourage them to maintain their key rates at restrictive levels (i.e., above the neutral rate) even in the face of sluggish growth.

### United States

The US economy remains strong: after annualised growth of 3.2% and 2.6% in Q3 and Q4 2022 and 2.0% in Q1 2023, the first estimate of GDP for Q2 2023 exceeded expectations, with annualised growth of 2.4% (compared with the consensus forecast of 1.8%). Moreover, the indicators available at the end of July for Q3 (chiefly survey data) point to growth of 3.5% according to the GDPNow calculation proposed by the Atlanta Fed. Fears that domestic demand would weaken as a result of the aggressive key rate hike by the US Federal Reserve (Fed) therefore failed to materialise, thanks in particular to the firmness of the labour market. However, over the months, the Purchasing Managers' Index (PMI) revealed a slowdown in activity in the manufacturing sector, while the services sector was increasingly buoyant. The services PMI (52.2 in July 2022) rose to 54.9 in May 2023, its highest level since April 2022. It then fell back to 52.3 in July 2023, while the manufacturing index ended the period under review at 49, compared with 52.2 the year before. The Composite Index, which reflects the health of the private sector, rose from 44.6 in August 2022 to 52 in July 2023. The slowdown in activity is therefore likely to come later in the year and, for the time being, the indicators appear to be more or less in line with the soft landing scenario favoured by the Fed, which in June issued an upward revision of its GDP growth forecast for the end of this year. Inflation slowed from its cycle peak of 9.1% year-on-year in June 2022 to 3.0% a year later. Core inflation declined more slowly: the core PCE (deflator of private spending excluding food and energy) reached a high of 5.2% in September and fluctuated between 4.6% and 4.7% from November onwards, which the Fed considered far too high.

### Europe

In the eurozone, GDP grew by 0.3% in Q2, returning to growth after a slight contraction at the end of 2022 and stagnation at the beginning of 2023. These movements reflect a very clear slowdown in growth year-on-year, falling from 2.4% in Q3 2022 to 0.6% in Q2 2023. Nevertheless, in view of the business surveys, many observers had predicted that the economic situation would deteriorate more sharply and more quickly. The eurozone economy proved more resilient to the energy shock than had been expected, and in addition, demand for services remained strong for much of the period under review. Conversely, activity slowed in the manufacturing sector, particularly in Germany. The German economy recorded two consecutive quarters of contraction before stagnating in Q2 2023. In July, the composite PMI fell to 48.6, its lowest level since November 2022, and the manufacturing PMI fell to a 38-month low, well below 50, reflecting a contraction in manufacturing activity. It should be noted that, until now, the growth actually recorded, or forecast by the major national institutes, has been higher than the levels implied by the results of these surveys. The strength of the labour market (unemployment rate at 6.5% since April, year-on-year employment growth in Q1 of 2.0% in hours worked and 1.6% in number of people employed) may explain this resilience. This phenomenon is also driving up labour costs, which is beginning to worry the ECB. Total inflation (which stood at 10.6% in October 2022) slowed to 5.3% in July thanks to a slowdown in goods inflation, while services inflation hit a new all-time high of 5.6%. Core inflation fell from a year-on-year high of 5.7% in March to 5.3% in May, before registering 5.5% in June and July. In light of this persistence, Christine Lagarde has indicated on several occasions that there is still "some way to go" to ensure that inflation returns to the 2% target and stays at that level.

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## Manager's report

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### Japan

The Bank of Japan (BoJ) has, for a long time, distanced itself from the widespread tightening of monetary policy in developed economies, believing that the acceleration in inflation to levels not seen for around 40 years is a temporary phenomenon linked to the cost of energy and imported goods. However, these price rises have weighed heavily on household confidence, which fell in November to its lowest level since June 2020. It then picked up again as the latest health restrictions were lifted, which had remained in place until the autumn. This being the case, it was only at the very end of the period that the BoJ took the plunge, announcing at the end of its monetary policy meeting on 28 July that the application of its yield curve control policy would from then on be more “flexible”. As it had hinted a few days earlier, it considers that the side-effects of ultra-accommodative policy are increasingly worrying. However, the announcements are sufficiently ambiguous to allow Governor Ueda to assert that this is not the first step towards normalisation. In June, core inflation (excluding fresh products) stood at 3.3% year-on-year, enabling the BoJ to confirm that the 2% target had not yet been reached in a sustainable and stable manner. The inflation forecast for the 2023/24 fiscal year has been revised upwards from +1.8% to +2.5%, but the BoJ continues to emphasise the importance of wage increases, which it deems insufficient. GDP growth for the first quarter proved to be relatively robust (an annualised rate of 2.7%), and previous quarters now reflect a slightly less bleak view of growth at the end of 2022. Productive investment was solid in Q1, but inventories also made a greater contribution, revealing that final domestic demand is still limited. The return of tourists to the Japanese Archipelago supported business activity from the beginning of 2023, enabling the composite PMI index to reach 54.3 in May, its highest level since 2013, driven by a marked acceleration in demand for services. The TANKAN, the BoJ's quarterly business survey published at the beginning of July showed a further improvement in business sentiment. What is more, investment intentions have been revised upwards from the previous survey, including for small businesses. Finally, companies' inflation expectations have been revised downwards, looking both one and three years ahead, and in the latter case come in at just over 2%.

### Emerging markets

China's GDP growth in 2022 averaged only 3.0%, well below the government's initial target. This result, combined with the very poor industrial production and, above all, consumption data in October and November, may explain the crucial about-turn in health policy at the end of 2022, when the zero-Covid policy was abandoned in favour of economic growth. After an initial burst of enthusiasm, particularly on the equity markets, the relevance of the theme of China's recovery as a support for global growth and emerging equities was called into question by ongoing difficulties in the property sector, half-hearted industrial production and consumer spending that remains fairly lacklustre. Indeed, after posting growth of 4.5% in Q1, GDP rose by 6.3% year-on-year during Q2 benefiting from favourable baseline effects. Quarter-on-quarter, the change in GDP is quite unexceptional (+0.6%) and the July business surveys provide no hope of a rapid rebound in economic growth. This deterioration in the economic situation means that support measures will have to be taken to achieve the government's growth target. The statement issued after the Politburo meeting at the end of July did not prove decisive: the authorities recognise the economic difficulties and are prepared to take action, but not at the cost of worsening structural imbalances. The declarations remain vague: “proactive” fiscal policy, “prudent” monetary policy, “measures to improve business and consumer confidence”. Apart from China, emerging Asia is benefiting from the new technology boom supporting semiconductor exports and production, even though inventories remain high. Latin America, on the other hand, is likely to be a drag on growth in the emerging zone this year. This should lead to the gradual introduction of less restrictive monetary policies in the countries concerned, now that inflation has eased sharply.

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## Manager's report

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### Monetary policy

At the start of the period, the US Federal Reserve (Fed) maintained a steady pace of monetary policy tightening, with two consecutive hikes of 75 bps (September and October). Over the months, the Fed increasingly focused on inflation, which is “widespread and too high”. It clearly indicated that, in order to push it back down towards the 2% target, rate hikes would continue, fighting against the idea of a “pivot” in monetary policy envisaged by investors encouraged by the slowing pace of rate hikes in December (+50 bps) and worsening business surveys. In 2023, the rate of increase was reduced to 25 bps (February, March and May) and the target rate for federal funds was raised to between 5.00% and 5.25% (a cumulative increase of 500 bps since March 2022), before a hold was announced on 14 June. At the end of July, a further 25 bp hike took place, with the Fed funds target rate now between 5.25% and 5.50%. Jerome Powell indicated that a recession could be ruled out for the time being and made it clear that he was not making any commitments for future meetings. Decisions would hinge on data for inflation and growth, which the press release described as “moderate”. The Fed Chairman repeated that labour market conditions would need to continue to ease. However, he also mentioned the tightening of lending conditions to the private sector reflected in the Fed’s survey of banks. In addition, he pointed out that if inflation falls convincingly, a restrictive policy will no longer be necessary. The Fed’s rhetoric is becoming more balanced, sustaining the idea that the terminal rate is near, and perhaps even has already been reached. The recent decisions and declarations have not altered the scenario that was sharply adjusted at the beginning of June: forward contracts reflect four to five cuts in key rates between now and the end of 2024 (with a rate of 4.20%). In the coming months, the Fed’s statements should focus on clarifying its intentions with regard to easing in 2024. For the time being, Jerome Powell has refused to specify what level of inflation would allow rates to start falling. Such a movement is predicted in the latest dot plot (which reflects the rate considered appropriate by FOMC members), but with a fairly wide dispersion of views.

Although anticipations of rate increases had emerged at the start of 2022, the European Central Bank (ECB) began its cycle of hikes in July 2022, opting for a rise of 50 bps despite previously indicating that it would raise rates by just 25 bps. It persisted with this aggressive approach throughout the months that followed, as inflation showed no signs of easing, ending the era of zero or negative rates in August with a rise of 75 bps. It went on to increase its three key rates by 75 bps in October and then by 50 bps in December, February and March, and finally by 25 bps in May, June and July, taking the deposit rate to 3.75%, the rate on the marginal lending facility to 4.50% and the rate on main refinancing operations to 4.25%. As a result, the deposit rate has returned to its highest level since 2001. After the decision on 16 March, the ECB indicated that recent tensions on the financial markets related to the US regional bank situation were adding to uncertainty around forecasts, but not affecting the baseline scenario that further rate rises would be necessary. Very quickly after this episode, the inflation target returned to the forefront with increasingly hawkish comments despite the timid dip in core inflation. Christine Lagarde has indicated on several occasions that there is still “some way to go” to ensure that inflation returns to the 2% target and stays at that level. In July, she changed her tune slightly, declaring that “we [...] have made great progress in this fight against inflation. We are moving towards our goal.” She also hedged her position on future monetary policy: “There could be a further hike of the policy rate or perhaps a pause. A pause, whenever it occurs, in September or later, would not necessarily be definitive.” These comments fuelled expectations of a pause in September and contributed to the slight downward revision in the terminal rate.



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## Manager's report

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### Currency markets

Highly aggressive statements and decisions from the Fed and concern about the health of the world economy caused rapid and generalised US dollar appreciation until September 2022. The weakening of the dollar from October can be attributed to the prospect of a change in Fed monetary policy and the renewed appetite for risk assets this hypothesis provoked. The EUR/USD exchange rate (1.0220 at end-July 2022) fell to under 1.00 on 22 August due to uncertainty regarding the supply of Russian gas to the eurozone and associated fears of a recession. Given concerns about growth, the tougher tone from ECB officials and the increase in their key rates from July were not enough to provide lasting support to the euro. The EUR/USD exchange rate trended towards 0.95 on 26 September (its lowest level in over 20 years) before rising again in Q4 amid a dollar move that took it above 1.07. In 2023, it initially benefited from the unexpected resilience of eurozone economies, even exceeding 1.10 for a time in early February, when investors were favouring a dovish interpretation of Jerome Powell's comments. Following the spectacular job creation figures for January in the United States, and despite the 50 bp rise in ECB interest rates on 2 February, the exchange rate fell back to close to 1.05 in late February/early March. Incidents in the banking sector led to erratic fluctuations, with the euro and the dollar each coming under pressure in turn. Insofar as it soon became apparent that the systemic risk could be averted (through regulation and strict supervision by the ECB), the euro was supported by the prospect of the ECB continuing to raise rates. Against this backdrop, the EUR/USD exchange rate initially rose above 1.10 in mid-April, before hovering around this level until early May as the ECB increasingly hardened its stance. The dollar was then supported by widespread nervousness on the financial markets (linked to persistent concerns about US regional banks and discussions about raising the debt ceiling), while the euro suffered from weak domestic demand. The exchange rate then fell back to around 1.06 at the end of May. In June and July, the euro was buoyed by the ECB's rate hike and the prospect of further tightening, rising sharply above 1.09 on 15 June to head towards 1.10, subsequently briefly topping 1.12 on 13 July, its highest point since February 2022, while the dollar was penalised by lower-than-expected inflation in the United States. The EUR/USD exchange rate closed at 1.0997 (+7.6% over 12 months).

The USD/JPY exchange rate, which stood at 133.27 at end-June 2022, moved higher after the summer as the Bank of Japan (BoJ) continued to view inflation as resulting from the rise in commodity prices. The exchange rate crossed the 150 threshold in October, hitting its highest level since July 1990 at 152 on 21 October. As in September, this triggered direct intervention in the currency market to support the yen. Subsequent movements continued to reflect expectations regarding the divergence between Fed and BoJ monetary policy. The dollar fell sharply after the BoJ's monetary policy meeting on 20 December, when the BoJ announced it was widening the band of its yield curve control. In 2023, the yen began to fall again, benefiting only very occasionally from its status as a safe-haven currency during the concerns raised by the collapse of several US regional banks in March. Fluctuations in the USD/JPY exchange rate were particularly turbulent on this occasion. The assumption that the BoJ would adjust its monetary policy, which was partly confirmed by the announcements at the end of July, then supported the yen, which until that time had suffered from the spread between Japan and the other major developed economies, conducive to carry trade strategies. However, investors are a little more cautious about these operations than they have been in the past, especially as, faced with the scale and speed of the fall, the BoJ has hinted that it may intervene on the foreign exchange market. Over a 12-month period, the Japanese currency fell 6.3% against the dollar and 13% against the euro. The USD/JPY exchange rate reached 142.29 at end-July.

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## Manager's report

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### Bond markets

Volatility on government bond yields remained high during the past year due to fluctuating expectations regarding monetary policy. Unanticipated country-specific events led to an overall decline on several separate occasions, making investors jittery. In September, misguided communication about fiscal policy in the United Kingdom forced the Bank of England (BoE) to intervene on the gilt market to re-establish financial stability. In December, the Bank of Japan (BoJ) changed its yield curve control policy unexpectedly. This weighed on markets around the world, and eurozone bond markets in particular. The BoE has subsequently continued to come up with surprises and disrupt world markets.

The start of the period under review represents virtually the lowest point in the last 12 months for the yield on the 10-year T-note (2.65% at end-July 2022), as investors gradually became convinced that the tightening cycle would be less brutal than announced and followed by easing in early 2023. After several unequivocal statements from members of the FOMC (Federal Open Market Committee), an upward trend took hold on short- and long-term yields and the 10-year yield came close to 4.25% in October – its peak for the period. From then on, it moved within a wide range, occasionally dipping below 3.50%, in line with monetary policy expectations fuelled by the slowdown in the pace of rate hikes. The Fed signalled that the rise would be 50 bps in December (after 75 bps in June, July, September and November), but emphasised the fact that the cycle of tightening would continue. Investors largely ignored this part of the message. In December, hawkish commentary from the ECB and then, above all, the Bank of Japan's unexpected move, influenced US yields. New sources of volatility disrupted government bonds in 2023; this was especially true of short-dated yields, which in mid-March suffered their largest daily variations since the early 1980s. Despite the swift response from the authorities, which stepped in to guarantee all deposits at insolvent regional banks, yields fell further on the back of fears that a recession caused by the banking crisis would force the Fed to aggressively cut its intervention rates. The 2-year rate (2.88% at end-July 2022) plunged, having risen above 4.50% in the autumn and then hovered around this threshold until early 2023 before rising above 5.00% just before the banking crisis. It then hovered between 3.80% and 4.25% until mid-May before rising again to finish at 4.88% at the end of July, representing an increase over the year of 200 bps. Meanwhile, the 10-year yield fell back below 3.40% in mid-March because of concerns about regional banks. It stagnated until mid-May, with volatility remaining high, albeit down on the levels seen in March, due to further bank failures. In addition, the debate over the US debt ceiling intensified as the weeks passed. This eminently political issue led to sharp fluctuations in the Credit Default Swap (CDS) market and yields on very short Treasury securities maturing just after the cut-off date (initially thought to be 1 June, then 5 June), as investors demanded a premium on securities that might not be repaid in the event of a technical default by the United States. Both quickly returned to normal levels once the Fiscal Responsibility Act of 2023, which suspends the debt ceiling until 1 January 2025, was ratified on 3 June. The 10-year yield fluctuated between 3.30% and 3.60% until mid-May, before settling at between 3.60% and 3.80%. At the end of June, the extremely hawkish comments made by the central bankers meeting in Sintra led to a rise in volatility and significant pressure on bond yields, fuelled by very solid economic indicators. The 10-year T-note yield thus ended at 3.96%, i.e. a 12-month rise of 131 bps.

This rally may have been chaotic, but the ECB's tougher rhetoric and key rate hikes from July pushed the German 10-year yield past all symbolic thresholds (from 0.82% in late July 2022 to 1.50% at end-August, 1.75% then 2.00% in September), to nearly 2.50% in October, a level not seen since 2011, while inflation surpassed 10% year on year. As the weeks went by, it became clear that the ECB would not hesitate to raise key rates to fight inflation, even if growth was showing signs of weakness. US yields caused erratic movements for a time, before an upward trend took hold again in December, pushing yields back up to almost 2.75% in early March just before turbulence hit the banking sector. Here too, market shifts were erratic and, on several occasions, accentuated by the reactions of investors caught on the back foot. For instance, after the fall that followed the ECB's 50 bp rate hike on 16 March, the 10-year German Bund yield was driven below 2.00% for a time in trading on 24 March, amid mounting concerns about European banks. During Q2 2022, the German 10-year Bund yield hovered between 2.20% and 2.50%, only occasionally rising above 2.50% to echo movement on international markets. Investors reacted particularly strongly to the debt ceiling negotiations in the United States and UK inflation data. The unexpected acceleration in UK core inflation (from 6.2% in March to 6.8% in April and 7.1% in May) raised fears that the scenario of falling core inflation would have to be reassessed in other developed economies. However, the symbolic and technical threshold of 2.50% for the German 10-year Bund yield could not be exceeded for long, as this level is considered by many investors to be an entry point into the market. On 11 July, however, it reached 2.65%, its highest level since early March. This threshold triggered market repositioning at rates deemed to be more attractive. The subsequent easing was fuelled by that of US bond yields, following the publication of price indices confirming the downturn in inflation. The German 10-year yield ended June at 2.49% (up 168 bps) and the 2-year yield at 3.04% (compared with 0.28% a year earlier), representing a rise over the year of 276 bps.

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## Manager's report

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### Equity markets

In the last 12 months, equities have fluctuated widely, both rising and falling, as expectations on monetary policy changed. At the start of the period, investors were expecting that central banks, particularly the US Federal Reserve (Fed), would be able to rapidly negotiate a less restrictive stance. However, key rate hikes were larger than expected in July and central bankers' rhetoric hardened considerably, becoming increasingly aggressive as the months went by. Combatting inflation remains the priority and justifies continued rate rises. Against this backdrop, the uptrend in risk assets seen until mid-August (despite the swift drop recorded in June) gave way to a sharp fall. In mid-October, the MSCI AC World reached a two-year low. Thereafter, investors welcomed the prospect of a slower pace of monetary tightening (changing their definition of a monetary policy pivot in the process). This hypothesis gave equities a sizeable boost in the autumn, but from mid-December investors once again had to pay greater heed to central bankers who considered that, faced with stubbornly high inflation, their monetary policy had to be restrictive and remain so during 2023 as long as core inflation stayed at levels incompatible with the target of 2%.

The instability of the economic consensus led to high volatility across all asset classes. In January, investors were looking for signs of an economic slowdown and an easing of inflation to confirm predictions of less aggressive monetary tightening, which allowed global equities to make a very positive start to the year. In February, by contrast, the indicators came in ahead of expectations, casting doubts on the idea of a "pivot" envisaged in January. In March, difficulties at a number of US regional banks and very limited contagion to Europe raised the spectre of a financial crisis. The swift response from the authorities saw equities end the first quarter of 2023 with strong gains (+6.8% for the MSCI AC World index in dollars), but did not prevent additional drastic changes to monetary policy expectations. Despite the various events that dominated trading from April onwards, global equities continued to rise in Q2 (+5.6%) extending their advance in July, and giving them a 10.9% year-on-year increase. Nervousness persisted in relation to the economic scenario, the crisis affecting US regional banks (when their results were published) and uncertainty over whether Congress would raise the US debt ceiling. In June, investors turned their attention to economic indicators. Although the data blew hot and cold, the US economy was shown to be resilient, allowing for the return of a soft landing scenario, which is in theory more favourable to risk assets than the other possibilities previously envisaged. The theme of the surge in technologies revolving around artificial intelligence has underpinned large sections of the market. However, given disappointing business surveys in the eurozone and doubts about the recovery of the Chinese economy, this consensus remained very fragile. The other crucial factor for equity investors over the past 12 months was the change in China's Covid strategy from November onwards, which initially supported emerging equities from end-November to end-January (with a 20% rise in the MSCI China index). From January onwards, doubts were raised about the relevance of the Chinese acceleration theme. In this turbulent climate, emerging market equities rose 5.4% year-on-year (MSCI Emerging Markets index in dollars). On developed markets, the S&P 500 index gained 11.1%, with the Eurostoxx 50 rising 20.6%, and the Nikkei 225 up 19.3%). Performances are those of indices in local currency, dividends not reinvested.

The Board of Directors

Luxembourg, 16 August 2023

*Note: The information stated in this report is historical and not necessarily indicative of future performance.*



## Audit report

To the Shareholders of  
**BNP Paribas Comfort**

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### Our opinion

In our opinion, the accompanying annual accounts give a true and fair view of the financial position of BNP Paribas Comfort (the “Fund”) and of each of its sub-funds as at 31 July 2023, and of the results of their operations and changes in their net assets for the year then ended in accordance with Luxembourg legal and regulatory requirements relating to the preparation and presentation of the annual accounts.

#### *What we have audited*

The Fund’s annual accounts comprise:

- the statement of net assets as at 31 July 2023;
- the statement of operations and changes in net assets for the year then ended;
- the securities portfolio as at 31 July 2023; and
- the notes to the annual accounts, which include a summary of significant accounting policies.

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### Basis for opinion

We conducted our audit in accordance with the Law of 23 July 2016 on the audit profession (Law of 23 July 2016) and with International Standards on Auditing (ISAs) as adopted for Luxembourg by the “Commission de Surveillance du Secteur Financier” (CSSF). Our responsibilities under the Law of 23 July 2016 and ISAs as adopted for Luxembourg by the CSSF are further described in the “Responsibilities of the “Réviseur d’entreprises agréé” for the audit of the annual accounts” section of our report.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

We are independent of the Fund in accordance with the International Code of Ethics for Professional Accountants, including International Independence Standards, issued by the International Ethics Standards Board for Accountants (IESBA Code) as adopted for Luxembourg by the CSSF together with the ethical requirements that are relevant to our audit of the annual accounts. We have fulfilled our other ethical responsibilities under those ethical requirements.

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### Other information

The Board of Directors of the Management Company is responsible for the other information. The other information comprises the information stated in the annual report but does not include the annual accounts and our audit report thereon.

Our opinion on the annual accounts does not cover the other information and we do not express any form of assurance conclusion thereon.



In connection with our audit of the annual accounts, our responsibility is to read the other information identified above and, in doing so, consider whether the other information is materially inconsistent with the annual accounts or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

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#### **Responsibilities of the Board of Directors of the Management Company for the annual accounts**

The Board of Directors of the Management Company is responsible for the preparation and fair presentation of the annual accounts in accordance with Luxembourg legal and regulatory requirements relating to the preparation and presentation of the annual accounts, and for such internal control as the Board of Directors of the Management Company determines is necessary to enable the preparation of annual accounts that are free from material misstatement, whether due to fraud or error.

In preparing the annual accounts, the Board of Directors of the Management Company is responsible for assessing the Fund's and each of its sub-funds' ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Board of Directors of the Management Company either intends to liquidate the Fund or close any of its sub-funds or to cease operations, or has no realistic alternative but to do so.

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#### **Responsibilities of the “Réviseur d’entreprises agréé” for the audit of the annual accounts**

The objectives of our audit are to obtain reasonable assurance about whether the annual accounts as a whole are free from material misstatement, whether due to fraud or error, and to issue an audit report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with the Law of 23 July 2016 and with ISAs as adopted for Luxembourg by the CSSF will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these annual accounts.

As part of an audit in accordance with the Law of 23 July 2016 and with ISAs as adopted for Luxembourg by the CSSF, we exercise professional judgment and maintain professional scepticism throughout the audit. We also:

- identify and assess the risks of material misstatement of the annual accounts, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;
- obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Fund's internal control;
- evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Board of Directors of the Management Company;



- conclude on the appropriateness of the Board of Directors of the Management Company's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Fund's or any of its sub-funds' ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our audit report to the related disclosures in the annual accounts or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our audit report. However, future events or conditions may cause the Fund or any of its sub-funds to cease to continue as a going concern;
- evaluate the overall presentation, structure and content of the annual accounts, including the disclosures, and whether the annual accounts represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

PricewaterhouseCoopers, Société coopérative  
Represented by

Luxembourg, 27 October 2023

Frédéric Botteman

# BNP PARIBAS COMFORT

## Financial statements at 31/07/2023

|  |                           | Bond Fund           | Equity Dividend Europe | Sustainable Equity World Plus | Combined             |
|--|---------------------------|---------------------|------------------------|-------------------------------|----------------------|
|  |                           | EUR                 | EUR                    | EUR                           | EUR                  |
|  | <i>Expressed in Notes</i> |                     |                        |                               |                      |
| <b>Statement of net assets</b>                           |                           |                     |                        |                               |                      |
| Assets   |                           | <b>205 124 631</b>  | <b>216 962 656</b>     | <b>222 751 505</b>            | <b>644 838 792</b>   |
| <i>Securities portfolio at cost price</i>                |                           | 210 389 801         | 176 503 541            | 190 601 083                   | 577 494 425          |
| <i>Unrealised gain/(loss) on securities portfolio</i>    |                           | (10 710 284)        | 38 064 036             | 30 828 784                    | 58 182 536           |
| Securities portfolio at market value                     | 2                         | 199 679 517         | 214 567 577            | 221 429 867                   | 635 676 961          |
| Net Unrealised gain on financial instruments             | 2,7,8                     | 188 960             | 0                      | 0                             | 188 960              |
| Cash at banks and time deposits                          |                           | 3 760 162           | 2 376 937              | 1 287 894                     | 7 424 993            |
| Other assets   |                           | 1 495 992           | 18 142                 | 33 744                        | 1 547 878            |
| Liabilities  |                           | <b>3 493 949</b>    | <b>882 017</b>         | <b>1 714 417</b>              | <b>6 090 383</b>     |
| Other liabilities  |                           | 3 493 949           | 882 017                | 1 714 417                     | 6 090 383            |
| Net asset value  |                           | <b>201 630 682</b>  | <b>216 080 639</b>     | <b>221 037 088</b>            | <b>638 748 409</b>   |
| <b>Statement of operations and changes in net assets</b> |                           |                     |                        |                               |                      |
| Income on investments and assets                         |                           | <b>931 695</b>      | <b>41 496</b>          | <b>413 649</b>                | <b>1 386 840</b>     |
| Management, advisory and charity fees                    | 3                         | 1 767 704           | 2 897 146              | 3 750 619                     | 8 415 469            |
| Bank interest  |                           | 4 677               | 1 524                  | 4 218                         | 10 419               |
| Interest on swaps  |                           | 224 722             | 0                      | 0                             | 224 722              |
| Other fees   | 4                         | 542 132             | 533 075                | 616 293                       | 1 691 500            |
| Taxes  | 5                         | 344 454             | 316 516                | 380 660                       | 1 041 630            |
| Transaction fees   | 11                        | 13 160              | 3 117                  | 9 379                         | 25 656               |
| Total expenses   |                           | <b>2 896 849</b>    | <b>3 751 378</b>       | <b>4 761 169</b>              | <b>11 409 396</b>    |
| Net result from investments                              |                           | <b>(1 965 154)</b>  | <b>(3 709 882)</b>     | <b>(4 347 520)</b>            | <b>(10 022 556)</b>  |
| Net realised result on:                                  |                           |                     |                        |                               |                      |
| Investments securities                                   | 2                         | (3 834 293)         | 8 809 773              | 2 163 478                     | 7 138 958            |
| Financial instruments                                    | 2                         | 950 625             | 0                      | (25 974)                      | 924 651              |
| Net realised result                                      |                           | <b>(4 848 822)</b>  | <b>5 099 891</b>       | <b>(2 210 016)</b>            | <b>(1 958 947)</b>   |
| Movement on net unrealised gain/(loss) on:               |                           |                     |                        |                               |                      |
| Investments securities                                   | 2                         | (6 330 874)         | 15 386 752             | (1 333 790)                   | 7 722 088            |
| Financial instruments                                    | 2                         | 704 284             | 0                      | 0                             | 704 284              |
| Change in net assets due to operations                   |                           | <b>(10 475 412)</b> | <b>20 486 643</b>      | <b>(3 543 806)</b>            | <b>6 467 425</b>     |
| Net subscriptions/(redemptions)                          |                           | <b>(61 125 164)</b> | <b>(46 120 803)</b>    | <b>(70 023 895)</b>           | <b>(177 269 862)</b> |
| Dividends paid   | 6                         | <b>(673 160)</b>    | <b>(6 972 435)</b>     | <b>(2 976 653)</b>            | <b>(10 622 248)</b>  |
| Increase/(Decrease) in net assets during the year/period |                           | <b>(72 273 736)</b> | <b>(32 606 595)</b>    | <b>(76 544 354)</b>           | <b>(181 424 685)</b> |
| Net assets at the beginning of the financial year/period |                           | <b>273 904 418</b>  | <b>248 687 234</b>     | <b>297 581 442</b>            | <b>820 173 094</b>   |
| Net assets at the end of the financial year/period       |                           | <b>201 630 682</b>  | <b>216 080 639</b>     | <b>221 037 088</b>            | <b>638 748 409</b>   |

# BNP PARIBAS COMFORT

## Key figures relating to the last 3 years

| <b>Bond Fund</b>                               | <b>EUR</b>        | <b>EUR</b>        | <b>EUR</b>        | <b>Number of units</b>     |
|--|-------------------|-------------------|-------------------|----------------------------|
|  | <b>31/07/2021</b> | <b>31/07/2022</b> | <b>31/07/2023</b> |                            |
| Net assets                                     | 371 095 202       | 273 904 418       | 201 630 682       |                            |
| Net asset value per unit                       |                   |                   |                   |                            |
| Units "Classic - Capitalisation"               | 141.71            | 127.54            | 122.82            | 349 350.711                |
| Units "Classic - Distribution"                 | 101.67            | 91.22             | 87.54             | 1 812 742.316              |
| Units "Privilege - Distribution"               | 106.01            | 95.44             | 91.93             | 389.403                    |
| <br><b>Equity Dividend Europe</b>              | <br><b>EUR</b>    | <br><b>EUR</b>    | <br><b>EUR</b>    | <br><b>Number of units</b> |
|  | <b>31/07/2021</b> | <b>31/07/2022</b> | <b>31/07/2023</b> | <b>31/07/2023</b>          |
| Net assets                                     | 304 981 214       | 248 687 234       | 216 080 639       |                            |
| Net asset value per unit                       |                   |                   |                   |                            |
| Units "Classic - Capitalisation"               | 163.46            | 153.07            | 167.54            | 407 153.558                |
| Units "Classic - Distribution"                 | 81.65             | 73.99             | 77.53             | 1 907 244.096              |
| <br><b>Sustainable Equity World Plus</b>       | <br><b>EUR</b>    | <br><b>EUR</b>    | <br><b>EUR</b>    | <br><b>Number of units</b> |
|  | <b>31/07/2021</b> | <b>31/07/2022</b> | <b>31/07/2023</b> | <b>31/07/2023</b>          |
| Net assets                                     | 296 556 369       | 297 581 442       | 221 037 088       |                            |
| Net asset value per unit                       |                   |                   |                   |                            |
| Units "Classic Solidarity BE - Capitalisation" | 195.22            | 191.51            | 191.24            | 613 067.630                |
| Units "Classic Solidarity BE - Distribution"   | 169.10            | 163.46            | 159.66            | 650 074.474                |



# BNP PARIBAS COMFORT Bond Fund

## Securities portfolio at 31/07/2023

Expressed in EUR

| Quantity                          | Denomination   | Quotation currency | Market value       | % of net assets |
|-----------------------------------|--|--------------------|--------------------|-----------------|
| Shares/Units in investment funds  |  |                    | 199 679 517        | 99.03           |
| <i>Luxembourg</i>                 |  |                    | <i>148 819 100</i> | <i>73.81</i>    |
| 24.18                             | ALPHA UCITS SICAV FAIR OAKS DYNAMIC CREDIT FUND - E EUR                  | EUR                | 27 053             | 0.01            |
| 7 169.68                          | ALPHA UCITS SICAV FAIR OAKS DYNAMIC CREDIT FUND - M EUR CAP              | EUR                | 8 198 810          | 4.07            |
| 402.21                            | AMSELECT BLUEBAY EURO BOND AGGREGATE X CAP                               | EUR                | 34 645 379         | 17.18           |
| 622 133.00                        | BNP PARIBAS EASY € CORP BOND SRI PAB - UCITS ETF CAP                     | EUR                | 5 838 780          | 2.90            |
| 41.68                             | BNP PARIBAS EASY JPM ESG EMBI GLOBAL DIVERSIFIED COMPOSITE - TRACK I CAP | USD                | 5 173 204          | 2.57            |
| 135.82                            | BNP PARIBAS EASY JPM ESG EMU GOVERNMENT BOND IG - TRACK I CAP            | EUR                | 16 843 234         | 8.35            |
| 63.46                             | BNP PARIBAS FLEXI I FLEXIBLE CONVERTIBLE BOND - I CAP                    | USD                | 7 222 597          | 3.58            |
| 39 105.37                         | BNP PARIBAS FUNDS EURO CORPORATE BOND - X CAP                            | EUR                | 8 427 207          | 4.18            |
| 40 352.93                         | BNP PARIBAS FUNDS EURO GOVERNMENT BOND - X CAP                           | EUR                | 17 246 843         | 8.55            |
| 17 293.70                         | BNP PARIBAS FUNDS EURO HIGH YIELD BOND - X CAP                           | EUR                | 2 849 137          | 1.41            |
| 28.37                             | BNP PARIBAS FUNDS SOCIAL BOND - X CAP                                    | EUR                | 2 601 933          | 1.29            |
| 403.70                            | CARMIGNAC-SECURT-X EUR ACC   | EUR                | 4 138 862          | 2.05            |
| 1 314 709.87                      | FRANKLIN EU TO RT-SYEI   | EUR                | 11 306 505         | 5.61            |
| 191 588.37                        | NORDEA 1 EUROPEAN HIGH YIELD BOND FUND - BI EUR CAP                      | EUR                | 7 142 855          | 3.54            |
| 309 205.32                        | NORDEA 1-EURO CON BD-BI EUR  | EUR                | 4 089 364          | 2.03            |
| 249 109.31                        | SLI-EUR CORP SUS & RES-K ACC   | EUR                | 2 390 677          | 1.19            |
| 190 544.05                        | STANDARD LIFE TOTAL RETURN CREDIT FUND - D HEDGED EUR CAP                | EUR                | 2 078 493          | 1.03            |
| 5 712.88                          | TCW METWEST UNCONST BOND-XU  | USD                | 6 188 243          | 3.07            |
| 229 823.00                        | UBS ETF BBG TIPS 10+ HEURA   | EUR                | 2 409 924          | 1.20            |
| <i>Ireland</i>                    |  |                    | <i>36 716 160</i>  | <i>18.21</i>    |
| 23 826.44                         | ALGEBRIS FINANCIAL CREDIT FUND - I EUR CAP                               | EUR                | 4 278 752          | 2.12            |
| 32 964.55                         | BARINGS EMERGING MARKETS LOCAL DEBT FUND - B USD ACC                     | USD                | 3 098 975          | 1.54            |
| 120 745.00                        | INVESCO US TREASURY DIST   | USD                | 4 024 651          | 2.00            |
| 3 363 264.00                      | ISHARES EURO GOVERNMENT BOND CLIMATE UCITS UCITS ETF EUR                 | EUR                | 13 754 068         | 6.82            |
| 219 946.31                        | LRD ABBTT SHRT DUR INC-IUA   | USD                | 2 312 074          | 1.15            |
| 382 390.79                        | PGIS-EMRGNG MKTS BND-INS ACC   | USD                | 5 185 019          | 2.57            |
| 183 579.79                        | PIMCO EURO BOND FUND - I EUR ACC   | EUR                | 4 062 621          | 2.01            |
| <i>United Kingdom</i>             |  |                    | <i>8 054 341</i>   | <i>3.99</i>     |
| 8 520 697.00                      | SEQUOIA ECONOMIC INFRASTRUCTURE INCOME FUND LIMITED - ORD NPV            | GBP                | 8 054 341          | 3.99            |
| <i>France</i>                     |  |                    | <i>6 025 494</i>   | <i>2.99</i>     |
| 260.22                            | BNP PARIBAS MOIS ISR - I CAP   | EUR                | 6 025 494          | 2.99            |
| <i>Supranational</i>              |  |                    | <i>64 422</i>      | <i>0.03</i>     |
| 0.72                              | AMSELECT ALLIANZ EURO CREDIT - X CAP                                     | EUR                | 64 422             | 0.03            |
| <b>Total securities portfolio</b> |  |                    | <b>199 679 517</b> | <b>99.03</b>    |

# BNP PARIBAS COMFORT Equity Dividend Europe

## Securities portfolio at 31/07/2023

Expressed in EUR

| Quantity                          | Denomination  | Quotation currency | Market value       | % of net assets |
|-----------------------------------|---|--------------------|--------------------|-----------------|
| Shares/Units in investment funds  |   |                    | 214 567 577        | 99.30           |
| <i>Luxembourg</i>                 |   |                    | <i>168 054 418</i> | <i>77.78</i>    |
| 187 344.00                        | AMSELECT AMUNDI EUROPE EQUITY VALUE - I CAP                           | EUR                | 20 665 917         | 9.56            |
| 107 438.00                        | AMSELECT JANUS HENDERSON EUROP EQUITY - I CAP                         | EUR                | 12 055 618         | 5.58            |
| 1 226 947.00                      | BLACKROCK-EU EQ INC-I2  | EUR                | 17 349 031         | 8.03            |
| 532 931.00                        | BNP PARIBAS EASY MSCI EUROPE ESG FILTERED MIN TE - UCITS ETF CAP      | EUR                | 7 409 286          | 3.43            |
| 32 421.28                         | BNP PARIBAS FUNDS EUROPE EQUITY - I CAP                               | EUR                | 11 396 728         | 5.27            |
| 14 084.68                         | BNP PARIBAS FUNDS EUROPE SMALL CAP - I CAP                            | EUR                | 3 974 555          | 1.84            |
| 124 495.30                        | BNP PARIBAS FUNDS SUSTAINABLE EUROPE DIVIDEND - I CAP                 | EUR                | 17 065 816         | 7.90            |
| 66 417.90                         | BNP PARIBAS FUNDS SUSTAINABLE EUROPE MULTI FACTOR EQUITY - I CAP      | EUR                | 11 085 148         | 5.13            |
| 7 381.01                          | ELEVA EUROPEAN SELECTION FUND - I2 EUR CAP                            | EUR                | 13 970 776         | 6.47            |
| 87 368.93                         | JP MORGAN INVESTMENT FUNDS EUROPE STRATEGIC DIVIDEND FUND - I EUR ACC | EUR                | 19 007 111         | 8.80            |
| 34 350.52                         | NN (L) EUROPE HIGH DIVIDEND - I CAP                                   | EUR                | 21 740 441         | 10.06           |
| 32 078.00                         | PICTET EUROPEAN SUSTAIN E - I EUR                                     | EUR                | 12 333 991         | 5.71            |
| <i>France</i>                     |   |                    | <i>26 633 212</i>  | <i>12.32</i>    |
| 1 857 630.00                      | BNP PARIBAS EASY STOXX EUROPE 600 UCITS ETF - CLASSIC CAP             | EUR                | 26 633 212         | 12.32           |
| <i>Ireland</i>                    |   |                    | <i>19 879 947</i>  | <i>9.20</i>     |
| 448 656.00                        | COMGEST GROWTH EUROPE-EUR - I - A                                     | EUR                | 19 879 947         | 9.20            |
| <b>Total securities portfolio</b> |   |                    | <b>214 567 577</b> | <b>99.30</b>    |

# BNP PARIBAS COMFORT Sustainable Equity World Plus

## Securities portfolio at 31/07/2023

Expressed in EUR

| Quantity                          | Denomination  | Quotation currency | Market value       | % of net assets |
|-----------------------------------|---|--------------------|--------------------|-----------------|
| Shares/Units in investment funds  |   |                    | 221 429 867        | 100.18          |
| <i>Luxembourg</i>                 |   |                    | <i>159 071 498</i> | <i>71.98</i>    |
| 1 200 098.00                      | BMO RESP GLOBAL EQ-I ACC EUR                                | EUR                | 16 945 384         | 7.67            |
| 51 525.44                         | BNP PARIBAS FUNDS CLIMATE IMPACT - I CAP                    | EUR                | 16 940 020         | 7.66            |
| 114 474.42                        | BNP PARIBAS FUNDS INCLUSIVE GROWTH - I CAP                  | EUR                | 17 606 165         | 7.97            |
| 10 185.00                         | BNP PARIBAS FUNDS SUSTAINABLE GLOBAL LOW VOL EQUITY - I CAP | EUR                | 7 931 772          | 3.59            |
| 1 112 035.00                      | JAN HN HOR GL SUST EQ -IU2US                                | USD                | 16 904 183         | 7.65            |
| 1 684 693.00                      | LO FD-GOLDN AGE-XIAEURACC                                   | EUR                | 15 109 506         | 6.84            |
| 1 023 819.00                      | M&G LUX GLOBAL LIST INF-JIE                                 | EUR                | 10 151 677         | 4.59            |
| 715 922.00                        | M&G LUX POSITV IMPACT-EURCIA                                | EUR                | 11 198 524         | 5.07            |
| 70 721.42                         | PICTET-CLEAN ENERGY-JEA                                     | EUR                | 11 739 048         | 5.31            |
| 1 556 477.00                      | SCHRODER INT-G CLIM CH-IZUSD                                | USD                | 17 257 971         | 7.81            |
| 67 886.31                         | SPARINVEST SICAV ETHICAL GLOBAL VALUE EUR HM2 ID X DIS      | EUR                | 17 287 248         | 7.82            |
| <i>Ireland</i>                    |   |                    | <i>43 208 602</i>  | <i>19.54</i>    |
| 1 210 025.00                      | UBS ETF ACWI SRI USD ACC                                    | EUR                | 20 086 415         | 9.09            |
| 744 556.00                        | X ESG MSCI WORLD  | EUR                | 23 122 187         | 10.45           |
| <i>France</i>                     |   |                    | <i>19 149 767</i>  | <i>8.66</i>     |
| 264.00                            | BNP PARIBAS AQUA - I CAP                                    | EUR                | 18 686 665         | 8.45            |
| 20.00                             | BNP PARIBAS MOIS ISR - I CAP                                | EUR                | 463 102            | 0.21            |
| <b>Total securities portfolio</b> |   |                    | <b>221 429 867</b> | <b>100.18</b>   |

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## Notes to the financial statements

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Notes to the financial statements at 31/07/2023

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## Note 1 - General information

### *Event that occurred during the financial year ended 31 July 2023*

No special event occurred during this financial year.

## Note 2 - Principal accounting methods

### *a) Net asset value*

This annual report is prepared on the basis of the last net asset value calculated as at 31 July 2023.

### *b) Presentation of the financial statements*

The financial statements of the Fund are presented in accordance with the legislation in force in Luxembourg on Undertakings for Collective Investment. The consolidation currency of the Fund is the euro (EUR).

The statement of operations and changes in net assets covers the financial year from 1 August 2022 to 31 July 2023.

### *c) Valuation of the securities portfolio*

The value of shares or units in Undertakings for Collective Investment shall be determined on the basis of the last net asset value available on the Valuation Day. If this price is not a true reflection, the valuation shall be based on the probable sale price estimated by the Board of Directors in a prudent and bona fide manner.

The valuation of all securities listed on a stock exchange or any other regulated market, which functions regularly, is recognised and accessible to the public, is based on the last known closing price on the Valuation Day, and, if the securities concerned are traded on several markets, on the basis of the last known closing price on the major market on which they are traded; if this price is not a true reflection, then the valuation shall be based on the probable sale price estimated by the Board of Directors of the Management Company in a prudent and bona fide manner.

Unlisted securities or securities not traded on a stock exchange or another regulated market which functions in a regular manner, is recognised and accessible to the public, shall be valued on the basis of the probable sale price estimated in a prudent and bona fide manner by a qualified professional appointed for this purpose by the Board of Directors of the Management Company.

### *d) Valuation of forward foreign exchange contracts*

Forward foreign exchange contracts remaining open at the closing date are valued by reference to the forward foreign exchange rate corresponding to the remaining life of the contract. Any unrealised gains and losses are included when determining the result of the transactions.

To calculate the net positions per currency, the positions are converted at the forward exchange rates corresponding to the remaining life of the contract.

### *e) Valuation of futures contracts*

Unexpired futures contracts are valued at the last price known on the valuation date or closing date and the resulting unrealised profits or losses are accounted for.

Margin accounts to guarantee the liabilities on futures contracts are included in the "Cash at banks and time deposits" account in the statement of net assets.

### *f) Valuation of credit default swaps*

The value of a Credit Default Swap (CDS) shall be determined by comparing the value of the protection swap leg and the value of the premium swap leg. The value of the premium leg is obtained by discounting the future premium flows using the relevant risk-adjusted discount. The value of the protection leg is the present value of the expected loss inherent to the contract. Default probabilities used to compute the expected loss are derived from the structure of par market swap rates. Par market swap rates will be obtained from a cross-section of market counterparties.

Notes to the financial statements at 31/07/2023

The unrealised appreciation/(depreciation) is disclosed in the Statement of net assets under “Net Unrealised gain on financial instruments” or “Net Unrealised loss on financial instruments”. Realised gains/(losses) and change in unrealised appreciation/(depreciation) as a result thereof are included in the Statement of operations and changes in net assets respectively under “Net realised result on Financial instruments” and “Movement on net unrealised gain/(loss) on Financial instruments”.

**g) Presentation of options**

Options contracts traded over-the-counter are valued at the prices at which the position could be liquidated under the market conditions prevailing at the valuation date. The liquidation value of forward contracts or options contracts traded on regulated markets will be based on the latest available settlement price of these contracts on the regulated markets on which these forward contracts or option contracts are traded by the Fund; provided that if a forward contract or an options contract cannot be liquidated on the day on which the net assets are valued, the basis that will be used to determine the liquidation value of this contract will be determined fairly and reasonably by the Board of Directors of the Management Company.

**h) Net realised result on the securities portfolios**

The net realised result on investment securities is calculated on the basis of the average cost of the securities sold.

**i) Conversion of foreign currencies**

The values expressed in a currency other than that in which the relevant sub-fund concerned is denominated are converted on the basis of the exchange rate applicable on the Valuation Day.

**j) Income on investments**

Dividends are recognized as income on the date on which they are declared and to the extent that the information in question can be obtained by the Fund. Interest is recognized on a daily basis.

**k) Swing pricing**

In certain market conditions, taking account of the volume of purchase and sale transactions in a given sub-fund, category or class and the size of these transactions, the Board of Directors of the Management Company may consider that it is in the interests of unitholders to calculate the NAV per unit based on the purchase and sale prices of the assets and/or by applying an estimate of the difference between the buy and sell price applicable on the markets on which the assets are traded. The Board of Directors of the Management Company may further adjust the NAV for transaction fees and sales commissions, provided these fees and commissions do not exceed 1% of the NAV of the sub-fund, category or class at that time. The NAV and the NAV per Unit disclosed in the financial statements and in the “Key figures relating to the last 3 years” do not include Swing pricing adjustment.

No swing pricing occurred during the financial year.

**Note 3 - Management, advisory and charity fees (maximum per annum)**

Management fees are calculated and deducted monthly from the average net assets of a sub-fund, unit category, or class of unit, are paid to the Management Company and serve to cover the remuneration of the asset managers and also distributors in connection with the marketing of the Fund’s units.

| Sub-fund                      | Management fee<br>(Maximum)<br>Classic* | Management fee<br>(Maximum)<br>Privilege | Management fee<br>(Maximum)<br>I | Advisory fee<br>(Maximum)** |
|-------------------------------|---|--|----------------------------------|-----------------------------|
| Bond Fund                     | 0.75%                                   | 0.50%***                                 | 0.35%                            | 0.10%                       |
| Equity Dividend Europe        | 1.25%                                   | 0.70%****                                | N/A                              | 0.15%                       |
| Sustainable Equity World Plus | 1.35%*****                              | N/A                                      | N/A                              | 0.15%                       |

\*Classic Solidarity BE for the sub-fund Sustainable Equity World Plus

\*\*Advisory fee has been removed since 01 May 2023

\*\*\*0.40% until April 2023

\*\*\*\*0.65% until April 2023

\*\*\*\*\*1.20% until April 2023

# BNP PARIBAS COMFORT

## Notes to the financial statements at 31/07/2023

An indirect fee of maximum 3.00% is applied for all the sub-funds and for the sub-fund Sustainable Equity World Plus, a charity fee of 0.05% is applied for the Unit class “Classic Solidarity BE”.

The maximum management fee applied for the underlying sub-funds is as follows:

| Security Name   | Management Fee |
|---|----------------|
| AMSelect Allianz Euro Credit X - Capitalisation                                     | 0.00%          |
| AMSelect Amundi Europe Equity Value I - Capitalisation                              | 0.75%          |
| AMSelect Bluebay Euro Bond Aggregate X - Capitalisation                             | 0.25%          |
| AMSelect Janus Henderson Europ Equity I - Capitalisation                            | 0.75%          |
| BNP Paribas Easy € Corp Bond SRI PAB UCITS ETF - Capitalisation                     | 0.08%          |
| BNP Paribas Easy JPM ESG EMBI Global Diversified Composite Track I - Capitalisation | 0.07%          |
| BNP Paribas Easy JPM ESG EMU Government Bond IG Track I - Capitalisation            | 0.02%          |
| BNP Paribas Easy MSCI Europe ESG Filtered Min TE UCITS ETF - Capitalisation         | 0.03%          |
| BNP Paribas Easy STOXX Europe 600 UCITS ETF Classic - Capitalisation                | 0.08%          |
| BNP Paribas Flexi I Flexible Convertible Bond I - Capitalisation                    | 0.40%          |
| BNP Paribas Funds Euro Corporate Bond X - Capitalisation                            | 0.00%          |
| BNP Paribas Funds Euro Government Bond X - Capitalisation                           | 0.00%          |
| BNP Paribas Funds Euro High Yield Bond X - Capitalisation                           | 0.00%          |
| BNP Paribas Funds Europe Equity I - Capitalisation                                  | 0.75%          |
| BNP Paribas Funds Europe Small Cap I - Capitalisation                               | 0.85%          |
| BNP Paribas Funds Inclusive Growth I - Capitalisation                               | 0.75%          |
| BNP Paribas Funds Social Bond X - Capitalisation                                    | 0.00%          |
| BNP Paribas Funds Sustainable Europe Dividend I - Capitalisation                    | 0.75%          |
| BNP Paribas Funds Sustainable Europe Multi Factor Equity I - Capitalisation         | 0.75%          |
| BNP Paribas Mois ISR I - Capitalisation   | 0.15%          |

### Note 4 - Other fees

Fee serving to cover notably the following services:

- administration, domiciliary and fund accounting
- audit
- custody, depositary and safekeeping
- documentation, such as preparing, printing, translating and distributing the Prospectus, Key Investor Information Documents, financial reports
- ESG certification and service fees
- financial index licensing (if applicable)
- legal expenses
- listing of units on a stock exchange (if applicable)
- management company expenses (including among other AML/CFT, KYC, Risk and oversight of delegated activities)
- marketing operations
- publishing fund performance data
- registration expenses including translation
- services associated with the required collection, tax and regulatory reporting, and publication of data about the Fund, its investments and unitholders
- transfer, registrar and payment agency

These fee do not include fees paid to independent directors and reasonable out-of-pocket expenses paid to all directors, expenses for operating hedged units, duties, taxes and transaction costs associated with buying and selling assets, brokerage and other transactions fees, interest and bank fees.

### Note 5 - Taxes

The Fund is liable in Luxembourg to an annual “*taxe d’abonnement*” of 0.05% of the net asset value.

This rate is reduced to 0.01% for:

- a) sub-funds with the exclusive objective of collective investments in money market instruments and deposits with credit institutions;

Notes to the financial statements at 31/07/2023

- b) sub-funds with the exclusive objective of collective investments in deposits with credit institutions;
- c) sub-funds, categories and/or classes reserved for Institutional Investors, Managers and UCIs.

Are exempt from paying the “*taxe d’abonnement*”:

- a) the value of the assets represented by units or shares held in other UCIs, where such units or shares have already been subject to the “*taxe d’abonnement*”;
- b) sub-funds, units categories and/or classes:
  - (i) whose securities are reserved for Institutional Investors, Managers or UCIs and
  - (ii) whose sole object is the collective investment in money market instruments and the placing of deposits with credit institutions, and
  - (iii) whose weighted residual portfolio maturity does not exceed 90 days, and
  - (iv) that have obtained the highest possible rating from a recognised rating agency;
- c) sub-funds, units categories and/or classes reserved to:
  - (i) institutions for occupational retirement pension or similar investment vehicles, set up at the initiative of one or more employers for the benefit of their employees, and
  - (ii) companies having one or more employers investing funds to provide pension benefits to their employees;
- d) sub-funds whose main objective is investment in microfinance institutions;
- e) sub-funds, units categories and/or classes:
  - (i) whose securities are listed or traded on at least one stock exchange or another regulated market operating regularly that is recognized and open to the public, and
  - (ii) whose exclusive object is to replicate the performance of one or several indices.

When due, the “*taxe d’abonnement*” is payable quarterly on the basis of the relevant net assets and calculated at the end of the quarter to which it is applicable.

In addition, the Fund may be subject to a foreign UCI's tax in the country where the sub-fund is registered for distribution. This tax includes the registration fees too.

**Note 6 - Dividends**

The following dividends were paid on 21 November 2022 for units outstanding as at 15 November 2022 with an ex-date 16 November 2022:

| Sub-fund   | Currency | Dividend |
|--|----------|----------|
| Bond Fund Classic - Distribution                                   | EUR      | 0.30     |
| Bond Fund Privilege - Distribution                                 | EUR      | 0.30     |
| Equity Dividend Europe Classic - Distribution                      | EUR      | 3.10     |
| Sustainable Equity World Plus Classic Solidarity BE - Distribution | EUR      | 3.40     |



# BNP PARIBAS COMFORT

## Notes to the financial statements at 31/07/2023

### Note 7 - Forward foreign exchange contracts

As at 31 July 2023, the total amount purchased per currency and the total amount sold per currency in the context of forward foreign exchange contracts were as follows:

#### *Bond Fund*

| Currency                            | Purchase amount | Currency | Sale amount    |
|-------------------------------------|-----------------|----------|----------------|
| EUR                                 | 35 738 871      | CHF      | 244 162        |
| NOK                                 | 19 408 500      | EUR      | 1 673 620      |
|                                     |                 | GBP      | 7 479 000      |
|                                     |                 | NOK      | 19 409 000     |
|                                     |                 | USD      | 27 635 810     |
| <b>Net unrealised gain (in EUR)</b> |                 |          | <b>143 497</b> |

As at 31 July 2023, the latest maturity of all outstanding contracts is 19 October 2023.

#### Counterparties to Forward foreign exchange contracts:

BNP Paribas Paris  
Citigroup Global Market  
Goldman Sachs International London  
Société Générale

### Note 8 - Futures contracts

As at 31 July 2023, the following positions were outstanding:

#### *Bond Fund*

| Currency | Quantity | Purchase/<br>Sale | Description              | Maturity   | Nominal<br>(in EUR) | Net<br>unrealised<br>gain/(loss)<br>(in EUR) |
|----------|----------|-------------------|--------------------------|------------|---------------------|--|
| EUR      | 19       | S                 | EURO-BUND FUTURE         | 07/09/2023 | 2 527 000           | (1 830)                                      |
| GBP      | 19       | P                 | LONG GILT FUTURE (LIFFE) | 27/09/2023 | 2 131 486           | 30 202                                       |
| USD      | 38       | P                 | US 10YR NOTE FUT (CBT)   | 20/09/2023 | 3 839 678           | 17 091                                       |
|          |          |                   |                          |            | <b>Total:</b>       | <b>45 463</b>                                |

As at 31 July 2023, the cash margin balance in relation to futures and/or options amounted to 216 451 EUR.

#### Clearer for Futures contracts:

BNP Paribas, France

### Note 9 - Changes in the composition of the securities portfolio

The list of changes in the composition of the securities portfolio during the year is available free of charge at the Management Company's registered office and from local agents.

### Note 10 - Exchange rate

As at 31 July 2023, all sub-funds and unit classes were denominated in EUR.

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Notes to the financial statements at 31/07/2023

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**Note 11 - Transaction fees**

Transaction fees incurred by the Fund relating to purchase or sale of transferable securities, money market instruments, derivatives or other eligible assets are mainly composed of standard fees, sundry fees on transaction, stamp fees, brokerage fees, custody fees, VAT fees, stock exchange fees and RTO fees (Reception and Transmission of Orders).

In line with bond market practice, a bid-offer spread is applied when buying and selling these securities. Consequently, in any given transaction, there will be a difference between the purchase and sale prices quoted by the broker, which represents the broker's fee.

**Note 12 - Global overview of collateral**

As at 31 July 2023, the counterparties to financial instruments pledged the following collaterals in favour of the Fund:

| Sub-fund  | Currency | OTC collateral | Type of collateral |
|-----------|----------|----------------|--------------------|
| Bond Fund | EUR      | 60 000         | Cash               |

**Note 13 - List of Fund managers**

- BNP PARIBAS ASSET MANAGEMENT France, Paris, abbreviated to BNPP AM France
- BNP PARIBAS ASSET MANAGEMENT UK Ltd., London, abbreviated to BNPP AM UK

| Sub-fund                      | Fund managers  |
|-------------------------------|--|
| Bond Fund                     | <b><u>BNPP AM UK</u></b>   |
| Equity Dividend Europe        | <b><u>BNPP AM France</u></b><br>Subdelegating Cash management and Exposure management to <b><u>BNPP AM UK</u></b>                |
| Sustainable Equity World Plus | <b><u>BNPP AM France</u></b><br>Subdelegating Cash management, Exposure management and FX management to <b><u>BNPP AM UK</u></b> |

**Note 14 - SFDR statement**

Information on environmental and/or social characteristics and/or sustainable investments is available in the relevant annexes under the (unaudited) Sustainable Finance Disclosure Regulation section.

**Note 15 - Significant event**

Since 24 February 2022, the Board of Directors has been very attentive to the consequences of the conflict between Russia and Ukraine and its impact on the energy shortage and food supplies in Europe. The Board of Directors closely monitors developments in terms of global outlook, market and financial risks in order to take all necessary measures in the interest of shareholders.

## Unaudited appendix

### Global market risk exposure

The Management Company of the Fund, after a risk profile assessment, decided to adopt the commitment approach to determine the global market risk exposure.

### Information on the Remuneration Policy in effect within the Management Company

We are providing below quantitative information concerning remuneration as required under Article 22 of the AIFM Directive (Directive 2011/61/EU of 8 June 2011) and Article 69(3) of the UCITS V Directive (Directive 2014/91/EU of 23 July 2014) in a format that is compliant with the recommendations of the association competent for the financial centre, the French Asset Management Association (Association Française de la Gestion financière - AFG)<sup>1</sup>.

#### **Aggregate remuneration of employees of BNP PARIBAS ASSET MANAGEMENT Luxembourg (“BNPP AM Luxembourg”) (point (e) of Article 22(2) of the AIFM Directive and point (a) of Article 69(3) of the UCITS V Directive):**

| Business sector                     | Number of employees | Total remuneration (fixed + variable) (EUR thousand) | of which total variable remuneration (EUR thousand) |
|-------------------------------------|---------------------|--|---|
| All employees of BNPP AM Luxembourg | 78                  | 8 248  | 1 098   |

#### **Aggregate remuneration of employees of BNPP AM Luxembourg whose work has a significant impact on the risk profile and who thus have the status of “Regulated Staff Members”<sup>2</sup> (point (f) of Article 22(2) of the AIFM Directive and point (b) of Article 69(3) of the UCITS V Directive):**

| Business sector   | Number of employees | Total remuneration (EUR thousand) |
|---|---------------------|-----------------------------------|
| Regulated Staff Members employed by BNPP AM Luxembourg:                                     | 3                   | 752                               |
| <i>of whom managers of Alternative Investment Funds/UCITS/managers of European mandates</i> | 0                   | 0                                 |

#### **Other information about BNPP AM Luxembourg:**

##### – Information on AIF and UCITS under management

|                              | Number of sub-funds (31/12/2022) | Assets under management (billions of euro) on 31/12/2022 <sup>3</sup> |
|------------------------------|----------------------------------|---|
| UCITS                        | 192                              | 118   |
| Alternative Investment Funds | 23                               | 3   |

- Under the supervision of the Remuneration Committee of BNP Paribas Asset Management Holding and its Board of Directors, a centralised independent audit of the global remuneration policy of BNP Paribas Asset Management along with its implementation during the 2021 financial year was carried out between June and September 2022. As a result of this audit, which covered the entities of BNP Paribas Asset Management holding an AIFM and/or UCITS licence, a score of “Satisfactory” was awarded (the highest of four possible scores), thus endorsing the solidity of the system in place, particularly in its key stages: identification of regulated staff members, consistency of the relation between performance and remuneration, application of mandatory deferred remuneration rules, implementation of indexation and deferred remuneration mechanisms. A recommendation - not presented as a warning - was issued in 2022, as some regulated staff members are not systematically assigned quantitative targets, and the documentation on the relative weighting of quantitative and qualitative targets sometimes needs to be improved.
- Further information concerning the calculation of variable remuneration and on these deferred remuneration instruments is provided in the description of the Remuneration Policy published on the Company's website.

<sup>1</sup> NB: the figures for remuneration provided below cannot be directly reconciled with the accounting data for the year as they reflect the amounts awarded based on staff numbers at the close of the annual variable remuneration campaign in May 2022. Thus, these amounts include for example all variable remuneration awarded during this campaign, whether deferred or not, and irrespective of whether or not the employees ultimately remained with the Company.

<sup>2</sup> The list of regulated staff members is drawn up on the basis of the review carried out at the end of the year.

<sup>3</sup> The amounts thus reported take into account master-feeder funds.

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Unaudited appendix

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**Information according to regulation on transparency of securities financing transactions**

The FCP is not affected by SFTR instruments during the financial year ending 31 July 2023.

**Transparency of the promotion of environmental or social characteristics and of sustainable investments**

To be noted that any difference between the charts “top investments” in the appendix section and the securities portfolio above are coming from the use of different data’s sources.

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**.

That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name :** BNP Paribas Comfort Bond Fund

**Legal Entity Identifier:** 213800HGYGD8ZURDL147

## ENVIRONMENTAL AND/OR SOCIAL CHARACTERISTICS

**Did this financial product have a sustainable investment objective?**

**Yes**

**No**

It made **sustainable investment with an environmental objective**: \_\_\_%

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It made **sustainable investments with a social objective** : \_\_\_%

It promoted **Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of 13.6 % of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promoted E/S characteristics, but **did not make any sustainable investments**

All actual data within this periodic report are calculated on the closing date of the accounting year.



### To what extent were the environmental and/or social characteristics promoted by this financial product met?

The financial product promotes environmental and social characteristics by assessing underlying investments against Environmental, Social and Governance (ESG) criteria, and by investing indirectly through funds, in bonds or shares of issuers that demonstrate good environmental and social practices, while implementing robust corporate governance practices within their sector of activity.

When investing through passive funds and/or external funds, the investment manager relies on ESG methodology and exclusion policies used by third-party asset managers and index providers as well as their engagement and voting policies and practices.

The external fund analysis team within the investment manager is dedicated to select external funds using a proprietary methodology.

In addition to the usual selection criteria (quantitative analysis, qualitative analysis and risk due diligence), the team offers a ranking based on extra-financial (or ESG) criteria for each recommended manager or fund in each sector. The team applies a qualitative rather than quantitative ESG rating to

the funds and managers selected in order to assess the effective implementation of ESG practices and the inclusion of extra-financial criteria in their investment process.

The ESG rating system for the team is based on fundamental principles:

- Consistency of approach systematically applied across all asset classes and sectors to ensure consistency in rating
- A proprietary methodology applicable to all funds, with well-defined rules to limit any subjectivity
- An ESG rating for both the management company and the fund (the last including the ESG rating of its management company) The team also analyses a specific SRI (Socially Responsible Investment) selection based on complementary approaches (negative screening, best-in-class / best-effort, positive screening / impact investing)

As all external funds under selection, SRI funds must go through a selection process in three stages (quantitative analysis, qualitative analysis and risk due diligence). Therefore the ESG criteria applied to the investment process are assessed by examining in particular (non-exhaustive list):

- The extra-financial constraints applicable to the Fund's investment universe
- The use of quantitative and qualitative criteria and ESG research in the investment process
- Taking financial and extra-financial requirements into account in the construction of the portfolio
- Monitoring and compliance check with the constraints of socially responsible investment

When investing through internal active funds, the investment manager relies on a proprietary ESG methodology and applies exclusion criteria with regard to issuers that are in violation of international norms and convention, or operate in sensitive sectors as defined by the Responsible Business Policy (RBC Policy).

The ESG performance of an issuer is evaluated against a combination of environmental, social and governance factors which include but not limited to :

- o Environmental: energy efficiency, reduction of emissions of greenhouse gases (GHG), treatment of waste;
- o Social: respect of human rights and workers' rights, human resources management (workers' health and safety, diversity);
- o Governance: Board of Directors independence, managers' remuneration, respect of minority shareholders rights.

Furthermore, the investment manager promotes better environmental and social outcomes through engagement with issuers and the exercise of voting rights according to the Stewardship policy, where applicable.

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the financial product

The environmental objectives as well as the social objectives to which the sustainable investments of the financial product have contributed are indicated in the question "What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?".

## ● *How did the sustainability indicators perform?*

The following sustainability indicators are used to measure the attainment of the environmental and social characteristics promoted by the financial product:

- The percentage of internal active funds compliant with the RBC Policy: **100%**
- The percentage of the financial product's assets invested, through internal and/or external active and/or passive funds, in funds categorised as Article 8 and Article 9 under the SFDR regulation: **at least 75%**
- The percentage of the financial product's portfolio invested in "sustainable investments" as defined in Article 2 (17) of the SFDR regulation: **13.6%**

## ● *...and compared to previous periods ?*

Not applicable for the first periodic report.

## ● *What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?*

The objectives of the sustainable investments made by the financial product are to indirectly finance companies that contribute to environmental and/or social objectives through their products and services, as well as their sustainable practices.

The Sustainable Investment minimum commitment of the financial product is calculated on an asset under management (AuM) weighted methodology without any minimum required for any underlying funds. As such, a look-through approach is applied in order to calculate the financial product's sustainable investment minimum proportion based on the data reported by the underlying funds.

Any sustainable investment commitment reported by external active and/or passive funds, selected by the dedicated internal team, are assessed thanks to specific methodologies developed by third-party asset managers and/or index providers.

Any sustainable investment commitment reported by internal active and/or passive funds are assessed thanks to the proprietary sustainable investment methodology as described below.

The internal methodology, as defined in the main part of the Prospectus, integrates several criteria into its definition of sustainable investments that are considered to be core components to qualify a company as sustainable. These criteria are complementary to each other. In practice, a company must meet at least one of the criteria described below in order to be considered as contributing to an environmental or social objective:

1. A company with an economic activity aligned with the EU Taxonomy objectives. A company can be qualified as sustainable investment in case it has more than 20% of its revenues aligned with the EU Taxonomy. A company qualifying as sustainable investment through this criteria can for example contribute to the following environmental objectives: sustainable forestry, environmental restoration, sustainable manufacturing, renewable energy, water supply, sewerage, waste management and remediation, sustainable transportation, sustainable buildings, sustainable information and technology, scientific research for sustainable development;
2. A company with an economic activity contributing to one or more United Nations Sustainable Development goals (UN SDG) targets. A company can be qualified as sustainable investment in case it has more than 20% of its revenues aligned with the SDGs and less than 20% of its revenues misaligned with the UN SDGs. A company qualifying as sustainable investment through this criteria can for example contribute to the following objectives:
  - a. Environmental: sustainable agriculture, sustainable management of water and sanitation, sustainable and modern energy, sustainable economic growth, sustainable infrastructure, sustainable cities, sustainable consumption and production patterns, fight against climate change, conservation and sustainable use of oceans, seas and marine resources, protection, restoration and sustainable use

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

- of terrestrial ecosystems, sustainable management of forests, fight against desertification, land degradation and biodiversity loss;
- b. Social: no poverty, zero hunger, food security, healthy lives and well-being at all ages, inclusive and equitable quality education and lifelong learning opportunities, gender equality, women and girls empowerment, availability of water and sanitation, access to affordable, reliable and modern energy, inclusive and sustainable economic growth, full and productive employment and decent work, resilient infrastructure, inclusive and sustainable industrialization, reduced inequality, inclusive, safe and resilient cities and human settlements, peaceful and inclusive societies, access to justice and effective, accountable and inclusive institutions, global partnership for sustainable development.
3. A company operating in a high GHG emission sector that is transitioning its business model to align with the objective of maintaining the global temperature rise below 1.5°C. A company qualifying as sustainable investment through this criteria can for example contribute to the following environmental objectives: GHG emissions reduction, fight against climate change;
  4. A company with best-in-class environmental or social practices compared to its peers within the relevant sector and geographical region. The E or S best performer assessment is based on the BNPP AM ESG scoring methodology. The methodology scores companies and assesses them against a peer group comprising companies in comparable sectors and geographical regions. A company with a contribution score above 10 on the Environmental or Social pillar qualifies as best performer. A company qualifying as sustainable investment through this criteria can for example contribute to the following objectives:
    - a. Environmental: fight against climate change, environmental risk management, sustainable management of natural resources, waste management, water management, GHG emissions reduction, renewable energy, sustainable agriculture, green infrastructure;
    - b. Social: health and safety, human capital management, good external stakeholder management (supply chain, contractors, data), business ethics preparedness, good corporate governance.

Green bonds, social bonds and sustainability bonds issued to support specific environmental and/or social projects are also qualified as sustainable investments provided that these debt securities receive an investment recommendation "POSITIVE" or "NEUTRAL" from the Sustainability Center following the issuer and underlying project assessment based on a proprietary Green/Social/Sustainability Bond Assessment methodology.

Companies identified as a sustainable investment should not significantly harm any other environmental or social objectives (the Do No Significant Harm "DNSH" principle) and should follow good governance practices. BNP Paribas Asset Management (BNPP AM) uses its proprietary methodology to assess all companies against these requirements.

The share of financial product investments considered by the SFDR regulation to be sustainable investments contributes in the proportions described in the question on the allocation of assets to the environmental objectives defined in the European Regulation on Taxonomy in force to date: climate change mitigation and/or adaptation to climate change.

More information on the internal methodology can be found on the website of the investment manager: [Sustainability documents - BNPP AM Corporate English \(bnpparibas-am.com\)](https://www.bnpparibas-am.com/sustainability).

***How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?***

Sustainable investments that the product partially intends to make, through investments into internal active funds, should not significantly harm any environmental or social objective (DNSH Principle). In this respect, the investment manager commits to consider principal adverse impacts on sustainability factors by taking into account indicators for adverse impacts as defined in SFDR, and to not invest in companies that do not meet their fundamental obligations in line with the OECD Guidelines and the UN Guiding Principles on Business and Human Rights.



**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

However, when investing through external funds and/or passive funds selected by the dedicated internal team, the investment manager relies on third-party asset manager and index providers assessment and reporting to perform the DNSH analysis in accordance with the regulatory requirements.

*How were the indicators for adverse impacts on sustainability factors taken into account?*

The investment manager ensures that throughout its investment process, the financial product takes into account all the principal adverse impact indicators that are relevant to its investment strategy to select the sustainable investments that the financial product partially intends to make by systematically implementing the sustainable investment pillars defined in the BNP Paribas Asset Management Global Sustainability Strategy (GSS) into its investment process : RBC policy, ESG integration guidelines, Stewardship, the forward-looking vision the '3Es' (Energy transition, Environmental sustainability, Equality & Inclusive Growth).

The RBC policy establishes a common framework across investments and economic activities that help identify industries and behaviours presenting a high risk of adverse impacts in violation of international norms. As part of the RBC Policy, sector policies provide a tailored approach to identify and prioritize principal adverse impacts based on the nature of the economic activity, and in many cases, the geography in which these economic activities take place.

The ESG Integration Guidelines includes a series of commitments, which are material to consideration of principal adverse sustainability impacts, and guides the internal ESG integration process. The proprietary ESG scoring framework includes an assessment of a number of adverse sustainability impacts caused by companies in which we invest. Outcome of this assessment may impact the valuation models as well as the portfolio construction depending on the severity and materiality of adverse impacts identified.

Thus, the Investment Manager considers principal adverse sustainability impacts throughout the investment process through the use of the internal ESG scores and construction of the portfolio with an improved ESG profile compared to its investment universe.

The Forward-looking perspective defines a set of objectives and developed performance indicators to measure how the researches, portfolios and commitments are aligned on three issues, the '3Es' (Energy transition, Environmental sustainability, Equality & inclusive growth) and thus support investment processes.

Furthermore, the Stewardship team regularly identifies adverse impacts through ongoing research, collaboration with other long-term investors, and dialogue with NGOs and other experts.

As regards the sustainable investments that the financial product intends to make, the following principal adverse sustainability impacts are taken into account:

Corporate mandatory indicators:

1. GreenHouse Gas (GHG) Emissions
2. Carbon footprint
3. GHG intensity of investee companies
4. Exposure to companies active in the fossil fuel sector
5. Share of non-renewable energy consumption and production
6. Energy consumption intensity per high impact climate sector
7. Activities negatively affecting biodiversity sensitive areas
8. Emissions to water
9. Hazardous waste ratio
10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises
12. Unadjusted gender pay gap
13. Board gender diversity

14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

Corporate voluntary indicators:

Environment

4. Investments in companies without carbon emission reduction initiatives

Social

4. Lack of a supplier code of conduct

9. Lack of a human rights policy

Sovereign mandatory indicator:

15. GHG intensity

16. Investee countries subject to social violations

More detailed information on the manner in which principal adverse impacts on sustainability factors are considered can be found in the BNP PARIBAS ASSET MANAGEMENT SFDR disclosure statement: <https://docfinder.bnpparibas-am.com/api/files/874ADAE2-3EE7-4AD4-BOED-84FC06E090BF>

However, when investing through external funds and/or passive funds selected by the dedicated internal team, the investment manager relies on third-party asset managers and index providers assessment and reporting for consideration of adverse impacts on sustainability factors.

*Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

The investment universe of the financial product is periodically screened with a view to identify issuers that are potentially in violation or at risk of violation of the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises and UN Guiding Principles on Business & Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights. This assessment is conducted within the BNPP AM Sustainability Centre on the basis of internal analysis and information provided by external experts, and in consultation with BNP Paribas Group CSR Team. If an issuer is found to be in serious and repeated violations of any of the principles, it will be placed on an 'exclusion list' and will not be available for investment. Existing investments should be divested from the portfolio according to an internal procedure. If an issuer is at risk of violating any of the principles, it is placed on a 'watch list' monitored, as appropriate.

However, when investing through external funds and/or passive funds selected by the dedicated internal team, the investment manager relies on third-party asset managers and index providers assessment and reporting for alignment of sustainable investments with the above-mentioned international norms and conventions.

*The EU Taxonomy sets out a 'do not significant harm' principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific Union criteria.*

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

*Any other sustainable investments must also not significantly harm any environmental or social objectives.*



## How did this financial product consider principal adverse impacts on sustainability factors ?

The product considers some principal adverse impacts on sustainability factors. When investing through external funds and/or passive funds selected by the dedicated internal team, the investment manager relies on third-party asset managers and index providers assessment and reporting for consideration of adverse impacts on sustainability factors.

On the other hand, all its investments into internal active funds systematically implement the sustainable investment pillars defined in the GSS into the financial product's investment process. These pillars are covered by firm-wide policies that set criteria to identify, consider and prioritise as well as address or mitigate adverse sustainability impacts caused by issuers.

The RBC policy establishes a common framework across investments and economic activities that help identify industries and behaviours presenting a high risk of adverse impacts in violation of international norms. As part of the RBC Policy, sector policies provide a tailored approach to identify and prioritize principal adverse impacts based on the nature of the economic activity, and in many cases, the geography in which these economic activities take place.

The ESG Integration Guidelines includes a series of commitments, which are material to consideration of principal adverse sustainability impacts, and guides the internal ESG integration process. The proprietary ESG scoring framework includes an assessment of a number of adverse sustainability impacts caused by companies in which we invest. Outcome of this assessment may impact the valuation models as well as the portfolio construction depending on the severity and materiality of adverse impacts identified.

Thus, the Investment Manager considers principal adverse sustainability impacts throughout the investment process through the use of the internal ESG scores and construction of the portfolio with an improved ESG profile compared to its investment universe.

The Forward-looking perspective defines a set of objectives and developed performance indicators to measure how the researches, portfolios and commitments are aligned on three issues, the "3Es" (Energy transition, Environmental sustainability, Equality & inclusive growth) and thus support investment processes.

Furthermore, the Stewardship team regularly identifies adverse impacts through ongoing research, collaboration with other long-term investors, and dialogue with NGOs and other experts.

Actions to address or mitigate principal adverse sustainability impacts depend on the severity and materiality of these impacts. These actions are guided by the RBC Policy, ESG Integration Guidelines, and Engagement and Voting Policy which include the following provisions:

- Exclusion of issuers that are in violation of international norms and conventions and issuers that are involved in activities presenting an unacceptable risk to society and/or the environment;
- Engagement with issuers with the aim of encouraging them to improve their environmental, social and governance practices and, thus, mitigate potential adverse impacts;
- In case of equity holdings, voting at Annual General Meetings of companies the portfolio is invested in to promote good governance and advance environmental and social issues;
- Ensuring all securities included in the portfolio have supportive ESG research.
- Managing portfolios so that their aggregate ESG score is better than the relevant benchmark or universe.

More detailed information on the manner in which principal adverse impacts on sustainability factors are considered can be found in the [BNP PARIBAS ASSET MANAGEMENT SFDR disclosure statement: sustainability risk integration and Principal Adverse Impacts considerations](#).



## What were the top investments of this financial product?

| Largest investments**                     | Sector     | % Assets* | Country**           |
|---|------------|-----------|---------------------|
| AMSELECT BLUEBAY EBA X C                  | Other      | 17,18%    | Luxembourg          |
| BNPP FD EURO GOV BD X C                   | Funds      | 8,55%     | Luxembourg          |
| BNPP E JPM ESG EMU GB IG T I C            | Funds      | 8,35%     | Luxembourg          |
| ISHARES GOVT BOND CLIMATE UCITS ETF ETF-F | Other      | 6,82%     | Republic of Ireland |
| FRANKLIN EU TO RT-SYEI                    | Other      | 5,61%     | Luxembourg          |
| BNPP FD EURO CORP BD X C                  | Funds      | 4,18%     | Luxembourg          |
| FAIR OAKS DYN CREDIT FD M CAP EUR         | Funds      | 4,07%     | Luxembourg          |
| SEQUOIA ECONOMIC INFRASTRUCT MFBDC        | Financials | 3,99%     | United Kingdom      |
| BNPP FLX I FLX CONV BD I C                | Other      | 3,58%     | Luxembourg          |
| NORDEA 1 EUR HGH YLD BI EUR               | Funds      | 3,54%     | Luxembourg          |
| TCW METWEST UNCONST BOND-XU               | Other      | 3,07%     | Luxembourg          |
| BNPP E CORP BD SRI PAB C ETF-F            | Other      | 2,90%     | Luxembourg          |
| PIMCO EMERGING BOND ESG I ACC USD         | Other      | 2,57%     | Republic of Ireland |
| BNPP E JPM ESG EMBI GDC T I C             | Funds      | 2,57%     | Luxembourg          |
| ALGEBRIS FINANCIAL CRD-IE                 | Funds      | 2,12%     | Republic of Ireland |

Source of data: BNP Paribas Asset Management, as at 31.07.2023

The largest investments are based on official accounting data and are based on the transaction date.

\* Any percentage differences with the financial statement portfolios result from a rounding difference.

\*\* Any difference with the portfolio statements above are coming from the use of different data's sources.



## What was the proportion of sustainability-related investments?

### ● What was the asset allocation ?

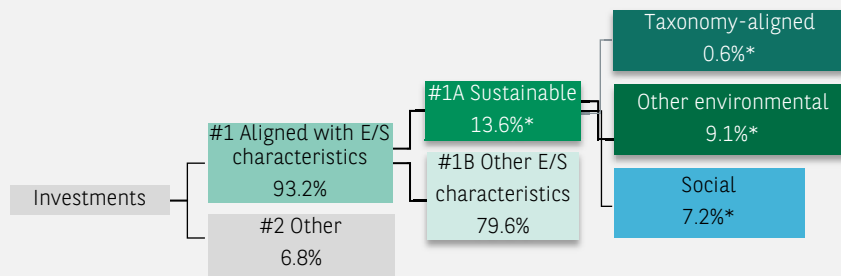
The proportion of the investments of the financial product used to meet the environmental or social characteristics promoted, in accordance with the binding elements of the investment strategy of the financial product is **93.2%**.

The proportion of sustainable investments of the financial product is **13.6%**.

The remaining proportion of the investments is mainly used as described under the question: "What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?"

The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is: 31.07.2023

**Asset allocation** describes the share of investments in specific assets.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers environmentally and socially sustainable investments.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

\*A portfolio security classified as sustainable investment may, taking into account all its activities, both contribute to a social objective and to an environmental objective (aligned or not with the taxonomy of the EU) and the figures shown take this into account. However, the same issuer can only be recognised once for sustainable investments (#1A Sustainable).

● *In which economic sectors were the investments made ?*

| Sectors         | % Asset |
|-----------------|---------|
| Other           | 50,63%  |
| Funds           | 41,42%  |
| Financials      | 3,99%   |
| Cash            | 3,86%   |
| Forex contracts | 0,07%   |
| Government      | 0,02%   |

Source of data: BNP Paribas Asset Management, as at 31.07.2023  
The largest investments are based on official accounting data and are based on the transaction date.



**To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?**

The financial product did not commit itself to having a minimum proportion of sustainable investments with an environmental objective in economic activities that are considered environmentally sustainable within the meaning of the EU Taxonomy, but did do so.

The two graphs below illustrate the extent to which sustainable investments with an environmental objective are aligned with the EU Taxonomy and contribute to the environmental objectives of climate change mitigation and adaptation.

The management company is improving its systems for collecting data in line with the EU Taxonomy to ensure the accuracy and adequacy of published sustainability information under the European Taxonomy Regulation. Further updates of the prospectus and the alignment of commitments with the EU Taxonomy may be made accordingly.

Economic activities that are not recognised by the EU taxonomy are not necessarily harmful to the environment or unsustainable. Moreover, not all activities that can make a substantial contribution to environmental and social objectives are yet integrated into the EU Taxonomy.

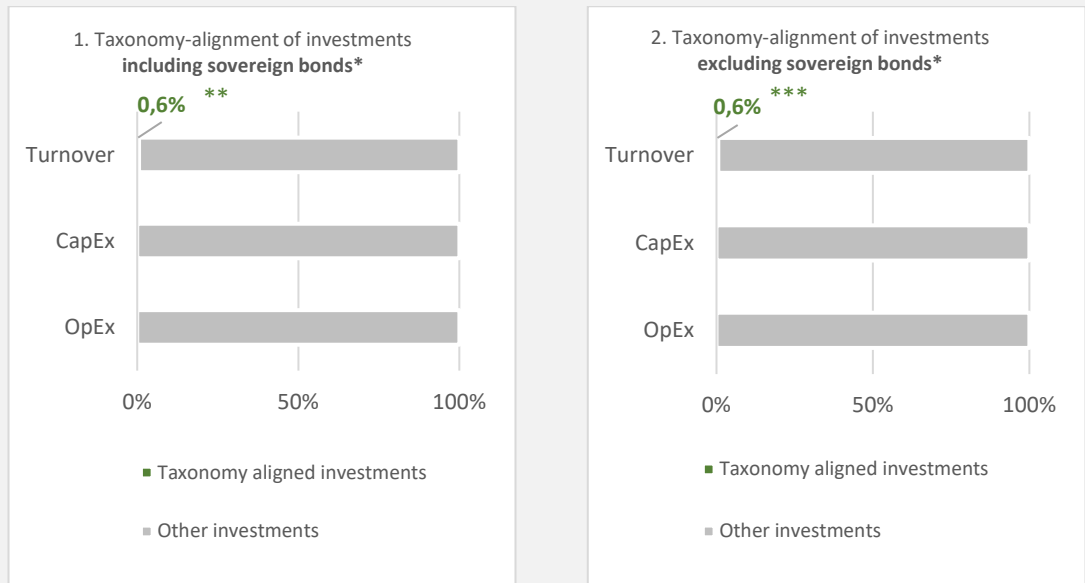
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

● **Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy <sup>1</sup>?**

- Yes:
  - In fossil gas
  - In nuclear energy
- ✘ No:

At the date of closure of the accounting year and preparation of the annual report, the data are not available and the management company does not have the information relating to the previous year.

*The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.*



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

\*\* Real taxonomy aligned

\*\*\* Real taxonomy aligned. At the date of this periodic information document, the management company does not have all the necessary data to determine the alignment of investments with the taxonomy excluding sovereign bonds. The percentage of alignment of investments with the taxonomy including sovereign bonds being by construction a real minimum proportion, this same figure is used accordingly.


Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies.
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

 are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852.

● ***What was the share of investments made in transitional and enabling activities?***

The share of investments in transitional and enabling activities within the meaning of the Regulations Taxonomy is 0% for transitional activities and 0% for enabling activities.

● ***How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods ?***

Not applicable for the first periodic report.



**What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?**

The share of sustainable investments with an environmental objective that are not aligned with the European Taxonomy Regulation is **9.1%**.

The management company is improving its systems for collecting data in line with the EU Taxonomy to ensure the accuracy and adequacy of published sustainability information under the European Taxonomy Regulation. Meanwhile, the financial product will invest in sustainable investments whose environmental objective is not aligned with the EU Taxonomy.



**What was the share of socially sustainable investments?**

Socially sustainable investments represent **7.2%** of the financial product.



**What investments were included under 'other', what was their purpose and were there any minimum environmental or social safeguards?**

The remaining proportion of the investments may include :

- For internal funds, the proportion of assets that are not used to meet the environmental or social characteristics promoted by the financial product. These assets are used for investment purposes, or
- For external funds, the proportion of assets that do not attain the minimum standard to meet environmental or social characteristics promoted by the underlying fund, according to third-party asset managers and index providers reporting, or
- instruments which are mainly used for liquidity, efficient portfolio management, and/or hedging purposes, notably cash, deposits and derivatives.

In any case, the investment manager will ensure that those investments are made while maintaining the improvement of the ESG profile of the financial product. In addition, those investments are made in compliance with our internal processes, including the following minimum environmental or social safeguards:

- the risk management policy. The risk management policy comprises procedures as are necessary to enable the management company to assess for each financial product it manages the exposure of that product to market, liquidity, sustainability and counterparty risks. And
- the RBC policy, where applicable, through the exclusion of companies involved in controversies due to poor practices related to human and labour rights, environment, and corruption, as well as companies operating in sensitive sectors (tobacco, coal, controversial weapons, asbestos,...), as these companies are deemed to be in violation of international norms, or to cause unacceptable harm to society and/or the environment.





## What actions have been taken to meet the environmental and/or social characteristics during the reference period ?

- The financial product shall invest through internal funds in compliance with the RBC Policy by excluding companies involved in controversies due to poor practices related to human and labor rights, environment, and corruption, as well as companies operating in sensitive sectors (tobacco, coal, controversial weapons, asbestos,...), as these companies are deemed to be in violation of international norms, or to cause unacceptable harm to society and/or the environment.

More information on the RBC Policy, and in particular criteria relating to sectoral exclusions, can be found on the website of the investment manager: [Sustainability documents - BNPP AM Corporate English \(bnpparibas-am.com\)](https://www.bnpparibas-am.com/en/sustainability-documents/);

- The financial product shall invest, through internal and/or external active and/or passive funds, at least 75% of its assets in funds categorised as Article 8 and Article 9 under the SFDR regulation (excluding ancillary liquid assets).
- The financial product shall invest at least 5% of its assets in “sustainable investments” as defined in Article 2 (17) of the SFDR regulation. Criteria to qualify an investment as “sustainable investment” are indicated in the above question “What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?” and the quantitative and qualitative thresholds are mentioned in the main part of the Prospectus.

In addition, the management company has implemented a voting and engagement policy. Several examples of commitments are detailed in the vote and commitment section of the Sustainability Report. These documents are available at the following link: <https://www.bnpparibas-am.com/en/sustainability-documents/>



## How did this financial product perform compared to the reference benchmark?

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the financial product.

- *How does the reference benchmark differ from a broad market index?*  
Not applicable
- *How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?*  
Not applicable
- *How did this financial product perform compared with the reference benchmark?*  
Not applicable
- *How did this financial product perform compared with the broad market index?*  
Not applicable

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**.

That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name :** BNP Paribas Comfort Equity Dividend Europe

**Legal Entity Identifier:** 2138003SEUEX2YPDZ103

## ENVIRONMENTAL AND/OR SOCIAL CHARACTERISTICS

**Did this financial product have a sustainable investment objective?**

**Yes**

**No**

|   |   |
|---|---|
| <p><input type="checkbox"/> It made <b>sustainable investment with an environmental objective</b>: ___%</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <p><input type="checkbox"/> It made <b>sustainable investments with a social objective</b> : ___%</p> | <p><input checked="" type="checkbox"/> It promoted <b>Environmental/Social (E/S) characteristics</b> and while it did not have as its objective a sustainable investment, it had a proportion of 35.1% of sustainable investments</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <p><input type="checkbox"/> It promoted E/S characteristics, but <b>did not make any sustainable investments</b></p> |
|---|---|

All actual data within this periodic report are calculated on the closing date of the accounting year.



### To what extent were the environmental and/or social characteristics promoted by this financial product met?

The financial product promotes environmental and social characteristics by assessing underlying investments against Environmental, Social and Governance (ESG) criteria, and by investing indirectly through funds, in bonds or shares of issuers that demonstrate good environmental and social practices, while implementing robust corporate governance practices within their sector of activity.

When investing through passive funds and/or external funds, the investment manager relies on ESG methodology and exclusion policies used by third-party asset managers and index providers as well as their engagement and voting policies and practices.

The external fund analysis team within the investment manager is dedicated to select external funds using a proprietary methodology.

In addition to the usual selection criteria (quantitative analysis, qualitative analysis and risk due diligence), the team offers a ranking based on extra-financial (or ESG) criteria for each recommended manager or fund in each sector. The team applies a qualitative rather than quantitative ESG rating to

the funds and managers selected in order to assess the effective implementation of ESG practices and the inclusion of extra-financial criteria in their investment process.

The ESG rating system for the team is based on fundamental principles:

- Consistency of approach systematically applied across all asset classes and sectors to ensure consistency in rating
- A proprietary methodology applicable to all funds, with well-defined rules to limit any subjectivity
- An ESG rating for both the management company and the fund (the last including the ESG rating of its management company) The team also analyses a specific SRI (Socially Responsible Investment) selection based on complementary approaches (negative screening, best-in-class / best-effort, positive screening / impact investing)

As all external funds under selection, SRI funds must go through a selection process in three stages (quantitative analysis, qualitative analysis and risk due diligence). Therefore the ESG criteria applied to the investment process are assessed by examining in particular (non-exhaustive list):

- The extra-financial constraints applicable to the Fund's investment universe
- The use of quantitative and qualitative criteria and ESG research in the investment process
- Taking financial and extra-financial requirements into account in the construction of the portfolio
- Monitoring and compliance check with the constraints of socially responsible investment

When investing through internal active funds, the investment manager relies on a proprietary ESG methodology and applies exclusion criteria with regard to issuers that are in violation of international norms and convention, or operate in sensitive sectors as defined by the Responsible Business Policy (RBC Policy).

The ESG performance of an issuer is evaluated against a combination of environmental, social and governance factors which include but not limited to :

- o Environmental: energy efficiency, reduction of emissions of greenhouse gases (GHG), treatment of waste;
- o Social: respect of human rights and workers' rights, human resources management (workers' health and safety, diversity);
- o Governance: Board of Directors independence, managers' remuneration, respect of minority shareholders rights.

Furthermore, the investment manager promotes better environmental and social outcomes through engagement with issuers and the exercise of voting rights according to the Stewardship policy, where applicable.

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the financial product

The environmental objectives as well as the social objectives to which the sustainable investments of the financial product have contributed are indicated in the question "What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?".

### ● *How did the sustainability indicators perform?*

The following sustainability indicators are used to measure the attainment of the environmental and social characteristics promoted by the financial product:

- The percentage of internal active funds compliant with the RBC Policy: **100%**
- The percentage of the financial product's assets invested, through internal and/or external active and/or passive funds, in funds categorised as Article 8 and Article 9 under the SFDR regulation: **at least 75%**
- The percentage of the financial product's portfolio invested in "sustainable investments" as defined in Article 2 (17) of the SFDR regulation: **35.1%**

### ● *...and compared to previous periods ?*

Not applicable for the first periodic report.

### ● *What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?*

The objectives of the sustainable investments made by the financial product are to indirectly finance companies that contribute to environmental and/or social objectives through their products and services, as well as their sustainable practices.

The Sustainable Investment minimum commitment of the financial product is calculated on an asset under management (AuM) weighted methodology without any minimum required for any underlying funds. As such, a look-through approach is applied in order to calculate the financial product's sustainable investment minimum proportion based on the data reported by the underlying funds.

Any sustainable investment commitment reported by external active and/or passive funds, selected by the dedicated internal team, are assessed thanks to specific methodologies developed by third-party asset managers and/or index providers.

Any sustainable investment commitment reported by internal active and/or passive funds are assessed thanks to the proprietary sustainable investment methodology as described below.

The internal methodology, as defined in the main part of the Prospectus, integrates several criteria into its definition of sustainable investments that are considered to be core components to qualify a company as sustainable. These criteria are complementary to each other. In practice, a company must meet at least one of the criteria described below in order to be considered as contributing to an environmental or social objective:

1. A company with an economic activity aligned with the EU Taxonomy objectives. A company can be qualified as sustainable investment in case it has more than 20% of its revenues aligned with the EU Taxonomy. A company qualifying as sustainable investment through this criteria can for example contribute to the following environmental objectives: sustainable forestry, environmental restoration, sustainable manufacturing, renewable energy, water supply, sewerage, waste management and remediation, sustainable transportation, sustainable buildings, sustainable information and technology, scientific research for sustainable development;
2. A company with an economic activity contributing to one or more United Nations Sustainable Development goals (UN SDG) targets. A company can be qualified as sustainable investment in case it has more than 20% of its revenues aligned with the SDGs and less than 20% of its revenues misaligned with the UN SDGs. A company qualifying as sustainable investment through this criteria can for example contribute to the following objectives:
  - a. Environmental: sustainable agriculture, sustainable management of water and sanitation, sustainable and modern energy, sustainable economic growth, sustainable infrastructure, sustainable cities, sustainable consumption and production patterns, fight against climate change, conservation and sustainable use of oceans, seas and marine resources, protection, restoration and sustainable use

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

- of terrestrial ecosystems, sustainable management of forests, fight against desertification, land degradation and biodiversity loss;
- b. Social: no poverty, zero hunger, food security, healthy lives and well-being at all ages, inclusive and equitable quality education and lifelong learning opportunities, gender equality, women and girls empowerment, availability of water and sanitation, access to affordable, reliable and modern energy, inclusive and sustainable economic growth, full and productive employment and decent work, resilient infrastructure, inclusive and sustainable industrialization, reduced inequality, inclusive, safe and resilient cities and human settlements, peaceful and inclusive societies, access to justice and effective, accountable and inclusive institutions, global partnership for sustainable development.
3. A company operating in a high GHG emission sector that is transitioning its business model to align with the objective of maintaining the global temperature rise below 1.5°C. A company qualifying as sustainable investment through this criteria can for example contribute to the following environmental objectives: GHG emissions reduction, fight against climate change;
  4. A company with best-in-class environmental or social practices compared to its peers within the relevant sector and geographical region. The E or S best performer assessment is based on the BNPP AM ESG scoring methodology. The methodology scores companies and assesses them against a peer group comprising companies in comparable sectors and geographical regions. A company with a contribution score above 10 on the Environmental or Social pillar qualifies as best performer. A company qualifying as sustainable investment through this criteria can for example contribute to the following objectives:
    - a. Environmental: fight against climate change, environmental risk management, sustainable management of natural resources, waste management, water management, GHG emissions reduction, renewable energy, sustainable agriculture, green infrastructure;
    - b. Social: health and safety, human capital management, good external stakeholder management (supply chain, contractors, data), business ethics preparedness, good corporate governance.

Green bonds, social bonds and sustainability bonds issued to support specific environmental and/or social projects are also qualified as sustainable investments provided that these debt securities receive an investment recommendation "POSITIVE" or "NEUTRAL" from the Sustainability Center following the issuer and underlying project assessment based on a proprietary Green/Social/Sustainability Bond Assessment methodology.

Companies identified as a sustainable investment should not significantly harm any other environmental or social objectives (the Do No Significant Harm "DNSH" principle) and should follow good governance practices. BNP Paribas Asset Management (BNPP AM) uses its proprietary methodology to assess all companies against these requirements.

The share of financial product investments considered by the SFDR regulation to be sustainable investments contributes in the proportions described in the question on the allocation of assets to the environmental objectives defined in the European Regulation on Taxonomy in force to date: climate change mitigation and/or adaptation to climate change.

More information on the internal methodology can be found on the website of the investment manager: [Sustainability documents - BNPP AM Corporate English \(bnpparibas-am.com\)](https://www.bnpparibas-am.com).

***How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?***

Sustainable investments that the product partially intends to make, through investments into internal active funds, should not significantly harm any environmental or social objective (DNSH Principle). In this respect, the investment manager commits to consider principal adverse impacts on sustainability factors by taking into account indicators for adverse impacts as defined in SFDR, and to not invest in companies that do not meet their fundamental obligations in line with the OECD Guidelines and the UN Guiding Principles on Business and Human Rights.

However, when investing through external funds and/or passive funds selected by the dedicated

internal team, the investment manager relies on third-party asset manager and index providers assessment and reporting to perform the DNSH analysis in accordance with the regulatory requirements.

### *How were the indicators for adverse impacts on sustainability factors taken into account?*

The investment manager ensures that throughout its investment process, the financial product takes into account all the principal adverse impact indicators that are relevant to its investment strategy to select the sustainable investments that the financial product partially intends to make by systematically implementing the sustainable investment pillars defined in the BNP Paribas Asset Management Global Sustainability Strategy (GSS) into its investment process : RBC policy, ESG integration guidelines, Stewardship, the forward-looking vision the '3Es' (Energy transition, Environmental sustainability, Equality & Inclusive Growth).

The RBC policy establishes a common framework across investments and economic activities that help identify industries and behaviours presenting a high risk of adverse impacts in violation of international norms. As part of the RBC Policy, sector policies provide a tailored approach to identify and prioritize principal adverse impacts based on the nature of the economic activity, and in many cases, the geography in which these economic activities take place.

The ESG Integration Guidelines includes a series of commitments, which are material to consideration of principal adverse sustainability impacts, and guides the internal ESG integration process. The proprietary ESG scoring framework includes an assessment of a number of adverse sustainability impacts caused by companies in which we invest. Outcome of this assessment may impact the valuation models as well as the portfolio construction depending on the severity and materiality of adverse impacts identified.

Thus, the Investment Manager considers principal adverse sustainability impacts throughout the investment process through the use of the internal ESG scores and construction of the portfolio with an improved ESG profile compared to its investment universe.

The Forward-looking perspective defines a set of objectives and developed performance indicators to measure how the researches, portfolios and commitments are aligned on three issues, the '3Es' (Energy transition, Environmental sustainability, Equality & inclusive growth) and thus support investment processes.

Furthermore, the Stewardship team regularly identifies adverse impacts through ongoing research, collaboration with other long-term investors, and dialogue with NGOs and other experts.

As regards the sustainable investments that the financial product intends to make, the following principal adverse sustainability impacts are taken into account:

#### Corporate mandatory indicators:

1. GreenHouse Gas (GHG) Emissions
2. Carbon footprint
3. GHG intensity of investee companies
4. Exposure to companies active in the fossil fuel sector
5. Share of non-renewable energy consumption and production
6. Energy consumption intensity per high impact climate sector
7. Activities negatively affecting biodiversity sensitive areas
8. Emissions to water
9. Hazardous waste ratio
10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

weapons and biological weapons)

Corporate voluntary indicators:

Environment

4. Investments in companies without carbon emission reduction initiatives

Social

4. Lack of a supplier code of conduct

9. Lack of a human rights policy

Sovereign mandatory indicator:

15. GHG intensity

16. Investee countries subject to social violations

More detailed information on the manner in which principal adverse impacts on sustainability factors are considered can be found in the BNP PARIBAS ASSET MANAGEMENT SFDR disclosure statement: <https://docfinder.bnpparibas-am.com/api/files/874ADAE2-3EE7-4AD4-BOED-84FC06E090BF>

However, when investing through external funds and/or passive funds selected by the dedicated internal team, the investment manager relies on third-party asset managers and index providers assessment and reporting for consideration of adverse impacts on sustainability factors.

*Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

The investment universe of the financial product is periodically screened with a view to identify issuers that are potentially in violation or at risk of violation of the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises and UN Guiding Principles on Business & Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights. This assessment is conducted within the BNPP AM Sustainability Centre on the basis of internal analysis and information provided by external experts, and in consultation with BNP Paribas Group CSR Team. If an issuer is found to be in serious and repeated violations of any of the principles, it will be placed on an 'exclusion list' and will not be available for investment. Existing investments should be divested from the portfolio according to an internal procedure. If an issuer is at risk of violating any of the principles, it is placed on a 'watch list' monitored, as appropriate.

However, when investing through external funds and/or passive funds selected by the dedicated internal team, the investment manager relies on third-party asset managers and index providers assessment and reporting for alignment of sustainable investments with the above-mentioned international norms and conventions.

*The EU Taxonomy sets out a 'do not significant harm' principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific Union criteria.*

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

*Any other sustainable investments must also not significantly harm any environmental or social objectives.*





## How did this financial product consider principal adverse impacts on sustainability factors ?

The product considers some principal adverse impacts on sustainability factors. When investing through external funds and/or passive funds selected by the dedicated internal team, the investment manager relies on third-party asset managers and index providers assessment and reporting for consideration of adverse impacts on sustainability factors.

On the other hand, all its investments into internal active funds systematically implement the sustainable investment pillars defined in the GSS into the financial product's investment process. These pillars are covered by firm-wide policies that set criteria to identify, consider and prioritise as well as address or mitigate adverse sustainability impacts caused by issuers.

The RBC policy establishes a common framework across investments and economic activities that help identify industries and behaviours presenting a high risk of adverse impacts in violation of international norms. As part of the RBC Policy, sector policies provide a tailored approach to identify and prioritize principal adverse impacts based on the nature of the economic activity, and in many cases, the geography in which these economic activities take place.

The ESG Integration Guidelines includes a series of commitments, which are material to consideration of principal adverse sustainability impacts, and guides the internal ESG integration process. The proprietary ESG scoring framework includes an assessment of a number of adverse sustainability impacts caused by companies in which we invest. Outcome of this assessment may impact the valuation models as well as the portfolio construction depending on the severity and materiality of adverse impacts identified.

Thus, the Investment Manager considers principal adverse sustainability impacts throughout the investment process through the use of the internal ESG scores and construction of the portfolio with an improved ESG profile compared to its investment universe.

The Forward-looking perspective defines a set of objectives and developed performance indicators to measure how the researches, portfolios and commitments are aligned on three issues, the "3Es" (Energy transition, Environmental sustainability, Equality & inclusive growth) and thus support investment processes.

Furthermore, the Stewardship team regularly identifies adverse impacts through ongoing research, collaboration with other long-term investors, and dialogue with NGOs and other experts.

Actions to address or mitigate principal adverse sustainability impacts depend on the severity and materiality of these impacts. These actions are guided by the RBC Policy, ESG Integration Guidelines, and Engagement and Voting Policy which include the following provisions:

- Exclusion of issuers that are in violation of international norms and conventions and issuers that are involved in activities presenting an unacceptable risk to society and/or the environment;
- Engagement with issuers with the aim of encouraging them to improve their environmental, social and governance practices and, thus, mitigate potential adverse impacts;
- In case of equity holdings, voting at Annual General Meetings of companies the portfolio is invested in to promote good governance and advance environmental and social issues;
- Ensuring all securities included in the portfolio have supportive ESG research.
- Managing portfolios so that their aggregate ESG score is better than the relevant benchmark or universe.

Based on the above approach, and depending on the composition of the financial product's portfolio (i.e. the type of issuer), the financial product considers and addresses or mitigates the following principal adverse sustainability impacts:

Corporate mandatory indicators:

4. Exposure to companies active in the fossil fuel sector
10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

More detailed information on the manner in which principal adverse impacts on sustainability factors are considered can be found in the BNP PARIBAS ASSET MANAGEMENT [SFDR disclosure statement: sustainability risk integration and Principal Adverse Impacts considerations](#).



## What were the top investments of this financial product?

| Largest investments**            | Sector | % Assets* | Country**           |
|----------------------------------|--------|-----------|---------------------|
| BNPP E STX ERP 600 EUR C C ETF-E | Other  | 12,33%    | France              |
| GS EUROPEAN HIGH DIVIDEND        | Other  | 10,06%    | Luxembourg          |
| AMSELECT AMUNDI ERP EQ V I C     | Other  | 9,56%     | Luxembourg          |
| COMGEST GROWTH EUROPE EUR IA     | Other  | 9,20%     | Republic of Ireland |
| JPM INV JPM EUR ST DIV I ACC     | Other  | 8,80%     | Luxembourg          |
| BGF EURO EQUITY INC FUND I2 EUR  | Other  | 8,03%     | Luxembourg          |
| BNPP FD SUST ERP DIV I C         | Other  | 7,90%     | Luxembourg          |
| ELEVA EUROPEAN SELECTION FUND    | Other  | 6,47%     | Luxembourg          |
| PICTETFD EUROPEA                 | Other  | 5,71%     | Luxembourg          |
| AMSELECT JANUS HEND ERP EQ I C   | Other  | 5,58%     | Luxembourg          |
| BNPP FD ERP EQ I C               | Other  | 5,27%     | Luxembourg          |
| BNPP FD ERP MF EQ I C            | Other  | 5,13%     | Luxembourg          |
| BNPP E MSCI ERP ESG FMTE C ETF-E | Other  | 3,43%     | Luxembourg          |
| BNPP FD ERP SC I C               | Other  | 1,84%     | Luxembourg          |

The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is: 31.07.2023

Source of data: BNP Paribas Asset Management, as at 31.07.2023

The largest investments are based on official accounting data and are based on the transaction date.

\* Any percentage differences with the financial statement portfolios result from a rounding difference.

\*\* Any difference with the portfolio statements above are coming from the use of different data's sources.



## What was the proportion of sustainability-related investments?

### ● What was the asset allocation ?

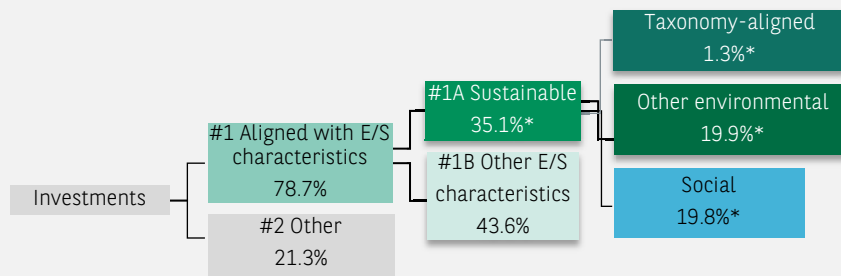
**Asset allocation** describes the share of investments in specific assets.

The proportion of the investments of the financial product used to meet the environmental or social characteristics promoted, in accordance with the binding elements of the investment strategy of the financial product is **78.7%**.

The proportion of sustainable investments of the financial product is **35.1%**

The remaining proportion of the investments is mainly used as described under the question: "What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?"





**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers environmentally and socially sustainable investments.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

\*A portfolio security classified as sustainable investment may, taking into account all its activities, both contribute to a social objective and to an environmental objective (aligned or not with the taxonomy of the EU) and the figures shown take this into account. However, the same issuer can only be recognised once for sustainable investments (#1A Sustainable).

● *In which economic sectors were the investments made ?*

| Sectors | % Asset |
|---------|---------|
| Other   | 99,30%  |
| Cash    | 0,70%   |

Source of data: BNP Paribas Asset Management, as at 31.07.2023  
The largest investments are based on official accounting data and are based on the transaction date.



**To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?**

The financial product did not commit itself to having a minimum proportion of sustainable investments with an environmental objective in economic activities that are considered environmentally sustainable within the meaning of the EU Taxonomy, but did do so.

The two graphs below illustrate the extent to which sustainable investments with an environmental objective are aligned with the EU Taxonomy and contribute to the environmental objectives of climate change mitigation and adaptation.

The management company is improving its systems for collecting data in line with the EU Taxonomy to ensure the accuracy and adequacy of published sustainability information under the European Taxonomy Regulation. Further updates of the prospectus and the alignment of commitments with the EU Taxonomy may be made accordingly.

Economic activities that are not recognised by the EU taxonomy are not necessarily harmful to the environment or unsustainable. Moreover, not all activities that can make a substantial contribution to environmental and social objectives are yet integrated into the EU Taxonomy.

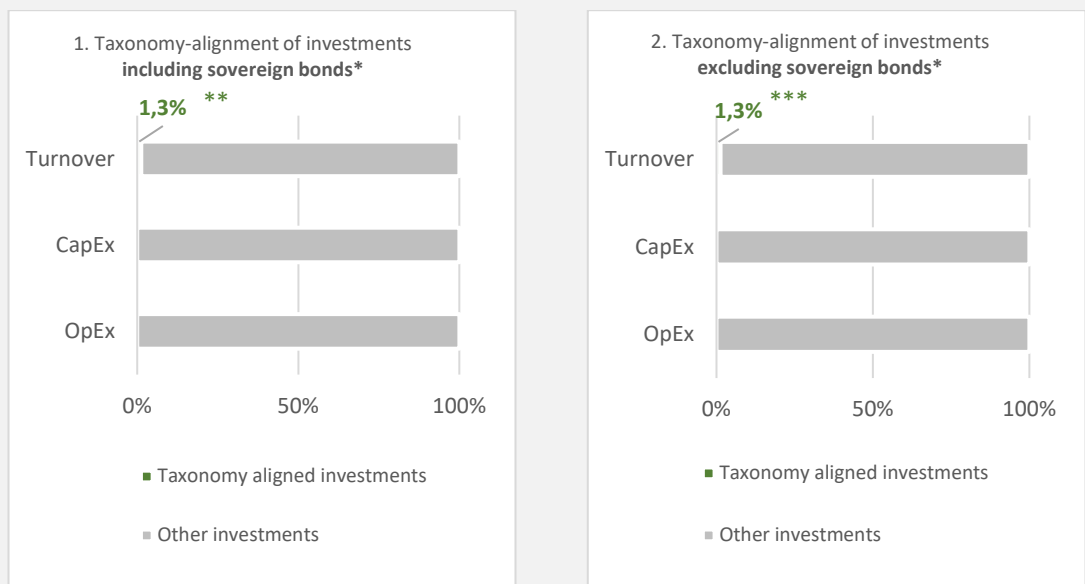
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

● **Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy <sup>1</sup>?**

- Yes:
  - In fossil gas
  - In nuclear energy
- No:

At the date of closure of the accounting year and preparation of the annual report, the data are not available and the management company does not have the information relating to the previous year.

*The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.*



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

\*\* Real taxonomy aligned

\*\*\* Real taxonomy aligned. At the date of this periodic information document, the management company does not have all the necessary data to determine the alignment of investments with the taxonomy excluding sovereign bonds. The percentage of alignment of investments with the taxonomy including sovereign bonds being by construction a real minimum proportion, this same figure is used accordingly.

● **What was the share of investments made in transitional and enabling activities?**

The share of investments in transitional and enabling activities within the meaning of the Regulations Taxonomy is 0% for transitional activities and 0% for enabling activities.

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies.
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

- *How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods ?*

Not applicable for the first periodic report.



### What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?

The share of sustainable investments with an environmental objective that are not aligned with the European Taxonomy Regulation is **19.9%**.

The management company is improving its systems for collecting data in line with the EU Taxonomy to ensure the accuracy and adequacy of published sustainability information under the European Taxonomy Regulation. Meanwhile, the financial product will invest in sustainable investments whose environmental objective is not aligned with the EU Taxonomy.



### What was the share of socially sustainable investments?

Socially sustainable investments represent **19.8%** of the financial product.



### What investments were included under 'other', what was their purpose and were there any minimum environmental or social safeguards?

The remaining proportion of the investments may include :

- For internal funds, the proportion of assets that are not used to meet the environmental or social characteristics promoted by the financial product. These assets are used for investment purposes, or
- For external funds, the proportion of assets that do not attain the minimum standard to meet environmental or social characteristics promoted by the underlying fund, according to third-party asset managers and index providers reporting, or
- instruments which are mainly used for liquidity, efficient portfolio management, and/or hedging purposes, notably cash, deposits and derivatives.

In any case, the investment manager will ensure that those investments are made while maintaining the improvement of the ESG profile of the financial product. In addition, those investments are made in compliance with our internal processes, including the following minimum environmental or social safeguards:

- the risk management policy. The risk management policy comprises procedures as are necessary to enable the management company to assess for each financial product it manages the exposure of that product to market, liquidity, sustainability and counterparty risks. And
- the RBC policy, where applicable, through the exclusion of companies involved in controversies due to poor practices related to human and labour rights, environment, and corruption, as well as companies operating in sensitive sectors (tobacco, coal, controversial weapons, asbestos,...), as these companies are deemed to be in violation of international norms, or to cause unacceptable harm to society and/or the environment.

 are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852.



## What actions have been taken to meet the environmental and/or social characteristics during the reference period ?

- The financial product shall invest through internal funds in compliance with the RBC Policy by excluding companies involved in controversies due to poor practices related to human and labor rights, environment, and corruption, as well as companies operating in sensitive sectors (tobacco, coal, controversial weapons, asbestos,...), as these companies are deemed to be in violation of international norms, or to cause unacceptable harm to society and/or the environment.

More information on the RBC Policy, and in particular criteria relating to sectoral exclusions, can be found on the website of the investment manager: [Sustainability documents - BNPP AM Corporate English \(bnpparibas-am.com\)](https://www.bnpparibas-am.com/en/sustainability-documents/);

- The financial product shall invest, through internal and/or external active and/or passive funds, at least 75% of its assets in funds categorised as Article 8 and Article 9 under the SFDR regulation (excluding ancillary liquid assets).
- The financial product shall invest at least 15% of its assets in “sustainable investments” as defined in Article 2 (17) of the SFDR regulation. Criteria to qualify an investment as “sustainable investment” are indicated in the above question “What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?” and the quantitative and qualitative thresholds are mentioned in the main part of the Prospectus.

In addition, the management company has implemented a voting and engagement policy. Several examples of commitments are detailed in the vote and commitment section of the Sustainability Report. These documents are available at the following link: <https://www.bnpparibas-am.com/en/sustainability-documents/>



## How did this financial product perform compared to the reference benchmark?

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the financial product.

- *How does the reference benchmark differ from a broad market index?*  
Not applicable
- *How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?*  
Not applicable
- *How did this financial product perform compared with the reference benchmark?*  
Not applicable
- *How did this financial product perform compared with the broad market index?*  
Not applicable

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**.

That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name :** BNP Paribas Comfort Sustainable Equity World Plus

**Legal Entity Identifier:** 213800X5D7E9CGTHZV45

## ENVIRONMENTAL AND/OR SOCIAL CHARACTERISTICS

**Did this financial product have a sustainable investment objective?**



Yes



No

|   |   |
|---|---|
| <input type="checkbox"/> It made <b>sustainable investment with an environmental objective</b> : ___% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> | <input checked="" type="checkbox"/> It promoted <b>Environmental/Social (E/S) characteristics</b> and while it did not have as its objective a sustainable investment, it had a proportion of 55.3% of sustainable investments <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> |
| <input type="checkbox"/> It made <b>sustainable investments with a social objective</b> : ___%  | <input type="checkbox"/> It promoted E/S characteristics, but <b>did not make any sustainable investments</b>   |

All actual data within this periodic report are calculated on the closing date of the accounting year.



### To what extent were the environmental and/or social characteristics promoted by this financial product met?

The financial product promotes environmental and social characteristics by assessing underlying investments against Environmental, Social and Governance (ESG) criteria, and by investing indirectly through funds, in bonds or shares of issuers that demonstrate good environmental and social practices, while implementing robust corporate governance practices within their sector of activity.

When investing through passive funds and/or external funds, the investment manager relies on ESG methodology and exclusion policies used by third-party asset managers and index providers as well as their engagement and voting policies and practices.

The external fund analysis team within the investment manager is dedicated to select external funds using a proprietary methodology.

In addition to the usual selection criteria (quantitative analysis, qualitative analysis and risk due diligence), the team offers a ranking based on extra-financial (or ESG) criteria for each recommended manager or fund in each sector. The team applies a qualitative rather than quantitative ESG rating to

the funds and managers selected in order to assess the effective implementation of ESG practices and the inclusion of extra-financial criteria in their investment process.

The ESG rating system for the team is based on fundamental principles:

- Consistency of approach systematically applied across all asset classes and sectors to ensure consistency in rating
- A proprietary methodology applicable to all funds, with well-defined rules to limit any subjectivity
- An ESG rating for both the management company and the fund (the last including the ESG rating of its management company) The team also analyses a specific SRI (Socially Responsible Investment) selection based on complementary approaches (negative screening, best-in-class / best-effort, positive screening / impact investing)

As all external funds under selection, SRI funds must go through a selection process in three stages (quantitative analysis, qualitative analysis and risk due diligence). Therefore the ESG criteria applied to the investment process are assessed by examining in particular (non-exhaustive list):

- The extra-financial constraints applicable to the Fund's investment universe
- The use of quantitative and qualitative criteria and ESG research in the investment process
- Taking financial and extra-financial requirements into account in the construction of the portfolio
- Monitoring and compliance check with the constraints of socially responsible investment

When investing through internal active funds, the investment manager relies on a proprietary ESG methodology and applies exclusion criteria with regard to issuers that are in violation of international norms and convention, or operate in sensitive sectors as defined by the Responsible Business Policy (RBC Policy).

The ESG performance of an issuer is evaluated against a combination of environmental, social and governance factors which include but not limited to :

- o Environmental: energy efficiency, reduction of emissions of greenhouse gases (GHG), treatment of waste;
- o Social: respect of human rights and workers' rights, human resources management (workers' health and safety, diversity);
- o Governance: Board of Directors independence, managers' remuneration, respect of minority shareholders rights.

Furthermore, the investment manager promotes better environmental and social outcomes through engagement with issuers and the exercise of voting rights according to the Stewardship policy, where applicable.

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the financial product

The environmental objectives as well as the social objectives to which the sustainable investments of the financial product have contributed are indicated in the question "What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?".

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

● *How did the sustainability indicators perform?*

The following sustainability indicators are used to measure the attainment of the environmental and social characteristics promoted by the financial product:

- The percentage of internal active funds compliant with the RBC Policy: **100%**
- The percentage of the financial product's assets invested, through internal and/or external active and/or passive funds, in funds categorised as Article 8 and Article 9 under the SFDR regulation: **at least 75%**
- The percentage of the financial product's portfolio invested in "sustainable investments" as defined in Article 2 (17) of the SFDR regulation: **55.3%**

● *...and compared to previous periods ?*

Not applicable for the first periodic report.

● *What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?*

The objectives of the sustainable investments made by the financial product are to indirectly finance companies that contribute to environmental and/or social objectives through their products and services, as well as their sustainable practices.

The Sustainable Investment minimum commitment of the financial product is calculated on an asset under management (AuM) weighted methodology without any minimum required for any underlying funds. As such, a look-through approach is applied in order to calculate the financial product's sustainable investment minimum proportion based on the data reported by the underlying funds.

Any sustainable investment commitment reported by external active and/or passive funds, selected by the dedicated internal team, are assessed thanks to specific methodologies developed by third-party asset managers and/or index providers.

Any sustainable investment commitment reported by internal active and/or passive funds are assessed thanks to the proprietary sustainable investment methodology as described below.

The internal methodology, as defined in the main part of the Prospectus, integrates several criteria into its definition of sustainable investments that are considered to be core components to qualify a company as sustainable. These criteria are complementary to each other. In practice, a company must meet at least one of the criteria described below in order to be considered as contributing to an environmental or social objective:

1. A company with an economic activity aligned with the EU Taxonomy objectives. A company can be qualified as sustainable investment in case it has more than 20% of its revenues aligned with the EU Taxonomy. A company qualifying as sustainable investment through this criteria can for example contribute to the following environmental objectives: sustainable forestry, environmental restoration, sustainable manufacturing, renewable energy, water supply, sewerage, waste management and remediation, sustainable transportation, sustainable buildings, sustainable information and technology, scientific research for sustainable development;
2. A company with an economic activity contributing to one or more United Nations Sustainable Development goals (UN SDG) targets. A company can be qualified as sustainable investment in case it has more than 20% of its revenues aligned with the SDGs and less than 20% of its revenues misaligned with the UN SDGs. A company qualifying as sustainable investment through this criteria can for example contribute to the following objectives:
  - a. Environmental: sustainable agriculture, sustainable management of water and sanitation, sustainable and modern energy, sustainable economic growth, sustainable infrastructure, sustainable cities, sustainable consumption and



- production patterns, fight against climate change, conservation and sustainable use of oceans, seas and marine resources, protection, restoration and sustainable use of terrestrial ecosystems, sustainable management of forests, fight against desertification, land degradation and biodiversity loss;
- b. Social: no poverty, zero hunger, food security, healthy lives and well-being at all ages, inclusive and equitable quality education and lifelong learning opportunities, gender equality, women and girls empowerment, availability of water and sanitation, access to affordable, reliable and modern energy, inclusive and sustainable economic growth, full and productive employment and decent work, resilient infrastructure, inclusive and sustainable industrialization, reduced inequality, inclusive, safe and resilient cities and human settlements, peaceful and inclusive societies, access to justice and effective, accountable and inclusive institutions, global partnership for sustainable development.
3. A company operating in a high GHG emission sector that is transitioning its business model to align with the objective of maintaining the global temperature rise below 1.5°C. A company qualifying as sustainable investment through this criteria can for example contribute to the following environmental objectives: GHG emissions reduction, fight against climate change;
  4. A company with best-in-class environmental or social practices compared to its peers within the relevant sector and geographical region. The E or S best performer assessment is based on the BNPP AM ESG scoring methodology. The methodology scores companies and assesses them against a peer group comprising companies in comparable sectors and geographical regions. A company with a contribution score above 10 on the Environmental or Social pillar qualifies as best performer. A company qualifying as sustainable investment through this criteria can for example contribute to the following objectives:
    - a. Environmental: fight against climate change, environmental risk management, sustainable management of natural resources, waste management, water management, GHG emissions reduction, renewable energy, sustainable agriculture, green infrastructure;
    - b. Social: health and safety, human capital management, good external stakeholder management (supply chain, contractors, data), business ethics preparedness, good corporate governance.

Green bonds, social bonds and sustainability bonds issued to support specific environmental and/or social projects are also qualified as sustainable investments provided that these debt securities receive an investment recommendation "POSITIVE" or "NEUTRAL" from the Sustainability Center following the issuer and underlying project assessment based on a proprietary Green/Social/Sustainability Bond Assessment methodology.

Companies identified as a sustainable investment should not significantly harm any other environmental or social objectives (the Do No Significant Harm "DNSH" principle) and should follow good governance practices. BNP Paribas Asset Management (BNPP AM) uses its proprietary methodology to assess all companies against these requirements.

The share of financial product investments considered by the SFDR regulation to be sustainable investments contributes in the proportions described in the question on the allocation of assets to the environmental objectives defined in the European Regulation on Taxonomy in force to date: climate change mitigation and/or adaptation to climate change.

More information on the internal methodology can be found on the website of the investment manager: [Sustainability documents - BNPP AM Corporate English \(bnpparisbas-am.com\)](https://www.bnpparisbas.com/en/asset-management/sustainability).

***How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?***

Sustainable investments that the product partially intends to make, through investments into internal active funds, should not significantly harm any environmental or social objective (DNSH Principle). In this respect, the investment manager commits to consider principal adverse impacts on sustainability factors by taking into account indicators for adverse impacts as defined in SFDR, and to not invest in companies that do not meet their fundamental obligations in line with the OECD Guidelines and the UN Guiding Principles on Business and Human Rights.



**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

However, when investing through external funds and/or passive funds selected by the dedicated internal team, the investment manager relies on third-party asset manager and index providers assessment and reporting to perform the DNSH analysis in accordance with the regulatory requirements.

*How were the indicators for adverse impacts on sustainability factors taken into account?*

The investment manager ensures that throughout its investment process, the financial product takes into account all the principal adverse impact indicators that are relevant to its investment strategy to select the sustainable investments that the financial product partially intends to make by systematically implementing the sustainable investment pillars defined in the BNP Paribas Asset Management Global Sustainability Strategy (GSS) into its investment process : RBC policy, ESG integration guidelines, Stewardship, the forward-looking vision the '3Es' (Energy transition, Environmental sustainability, Equality & Inclusive Growth).

The RBC policy establishes a common framework across investments and economic activities that help identify industries and behaviours presenting a high risk of adverse impacts in violation of international norms. As part of the RBC Policy, sector policies provide a tailored approach to identify and prioritize principal adverse impacts based on the nature of the economic activity, and in many cases, the geography in which these economic activities take place.

The ESG Integration Guidelines includes a series of commitments, which are material to consideration of principal adverse sustainability impacts, and guides the internal ESG integration process. The proprietary ESG scoring framework includes an assessment of a number of adverse sustainability impacts caused by companies in which we invest. Outcome of this assessment may impact the valuation models as well as the portfolio construction depending on the severity and materiality of adverse impacts identified.

Thus, the Investment Manager considers principal adverse sustainability impacts throughout the investment process through the use of the internal ESG scores and construction of the portfolio with an improved ESG profile compared to its investment universe.

The Forward-looking perspective defines a set of objectives and developed performance indicators to measure how the researches, portfolios and commitments are aligned on three issues, the '3Es' (Energy transition, Environmental sustainability, Equality & inclusive growth) and thus support investment processes.

Furthermore, the Stewardship team regularly identifies adverse impacts through ongoing research, collaboration with other long-term investors, and dialogue with NGOs and other experts.

As regards the sustainable investments that the financial product intends to make, the following principal adverse sustainability impacts are taken into account:

Corporate mandatory indicators:

1. GreenHouse Gas (GHG) Emissions
2. Carbon footprint
3. GHG intensity of investee companies
4. Exposure to companies active in the fossil fuel sector
5. Share of non-renewable energy consumption and production
6. Energy consumption intensity per high impact climate sector
7. Activities negatively affecting biodiversity sensitive areas
8. Emissions to water
9. Hazardous waste ratio
10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises
12. Unadjusted gender pay gap
13. Board gender diversity

14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

Corporate voluntary indicators:

Environment

4. Investments in companies without carbon emission reduction initiatives

Social

4. Lack of a supplier code of conduct

9. Lack of a human rights policy

Sovereign mandatory indicator:

15. GHG intensity

16. Investee countries subject to social violations

More detailed information on the manner in which principal adverse impacts on sustainability factors are considered can be found in the BNP PARIBAS ASSET MANAGEMENT SFDR disclosure statement: <https://docfinder.bnpparibas-am.com/api/files/874ADAE2-3EE7-4AD4-BOED-84FC06E090BF>

However, when investing through external funds and/or passive funds selected by the dedicated internal team, the investment manager relies on third-party asset managers and index providers assessment and reporting for consideration of adverse impacts on sustainability factors.

*Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

The investment universe of the financial product is periodically screened with a view to identify issuers that are potentially in violation or at risk of violation of the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises and UN Guiding Principles on Business & Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights. This assessment is conducted within the BNPP AM Sustainability Centre on the basis of internal analysis and information provided by external experts, and in consultation with BNP Paribas Group CSR Team. If an issuer is found to be in serious and repeated violations of any of the principles, it will be placed on an 'exclusion list' and will not be available for investment. Existing investments should be divested from the portfolio according to an internal procedure. If an issuer is at risk of violating any of the principles, it is placed on a 'watch list' monitored, as appropriate.

However, when investing through external funds and/or passive funds selected by the dedicated internal team, the investment manager relies on third-party asset managers and index providers assessment and reporting for alignment of sustainable investments with the above-mentioned international norms and conventions.

***The EU Taxonomy sets out a 'do not significant harm' principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific Union criteria.***

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

***Any other sustainable investments must also not significantly harm any environmental or social objectives.***



## How did this financial product consider principal adverse impacts on sustainability factors ?

The product considers some principal adverse impacts on sustainability factors. When investing through external funds and/or passive funds selected by the dedicated internal team, the investment manager relies on third-party asset managers and index providers assessment and reporting for consideration of adverse impacts on sustainability factors.

On the other hand, all its investments into internal active funds systematically implement the sustainable investment pillars defined in the GSS into the financial product's investment process. These pillars are covered by firm-wide policies that set criteria to identify, consider and prioritise as well as address or mitigate adverse sustainability impacts caused by issuers.

The RBC policy establishes a common framework across investments and economic activities that help identify industries and behaviours presenting a high risk of adverse impacts in violation of international norms. As part of the RBC Policy, sector policies provide a tailored approach to identify and prioritize principal adverse impacts based on the nature of the economic activity, and in many cases, the geography in which these economic activities take place.

The ESG Integration Guidelines includes a series of commitments, which are material to consideration of principal adverse sustainability impacts, and guides the internal ESG integration process. The proprietary ESG scoring framework includes an assessment of a number of adverse sustainability impacts caused by companies in which we invest. Outcome of this assessment may impact the valuation models as well as the portfolio construction depending on the severity and materiality of adverse impacts identified.

Thus, the Investment Manager considers principal adverse sustainability impacts throughout the investment process through the use of the internal ESG scores and construction of the portfolio with an improved ESG profile compared to its investment universe.

The Forward-looking perspective defines a set of objectives and developed performance indicators to measure how the researches, portfolios and commitments are aligned on three issues, the "3Es" (Energy transition, Environmental sustainability, Equality & inclusive growth) and thus support investment processes.

Furthermore, the Stewardship team regularly identifies adverse impacts through ongoing research, collaboration with other long-term investors, and dialogue with NGOs and other experts.

Actions to address or mitigate principal adverse sustainability impacts depend on the severity and materiality of these impacts. These actions are guided by the RBC Policy, ESG Integration Guidelines, and Engagement and Voting Policy which include the following provisions:

- Exclusion of issuers that are in violation of international norms and conventions and issuers that are involved in activities presenting an unacceptable risk to society and/or the environment;
- Engagement with issuers with the aim of encouraging them to improve their environmental, social and governance practices and, thus, mitigate potential adverse impacts;
- In case of equity holdings, voting at Annual General Meetings of companies the portfolio is invested in to promote good governance and advance environmental and social issues;
- Ensuring all securities included in the portfolio have supportive ESG research.
- Managing portfolios so that their aggregate ESG score is better than the relevant benchmark or universe.

Based on the above approach, and depending on the composition of the financial product's portfolio (i.e. the type of issuer), the financial product considers and addresses or mitigates the following principal adverse sustainability impacts:

Corporate mandatory indicators:

4. Exposure to companies active in the fossil fuel sector
10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

More detailed information on the manner in which principal adverse impacts on sustainability factors are considered can be found in the BNP PARIBAS ASSET MANAGEMENT [SFDR disclosure statement: sustainability risk integration and Principal Adverse Impacts considerations](#).



## What were the top investments of this financial product?

| Largest investments**                                 | Sector     | % Assets* | Country**           |
|---|------------|-----------|---------------------|
| XTRACKERS ESG MSCI WORLD UCITS ETF ETF-E              | Financials | 10,46%    | Republic of Ireland |
| UBS (IRL) ETF PLC MSCI ACWI SOC RSP UETF USD AA ETF-E | Other      | 9,09%     | Republic of Ireland |
| BNPP AQUA I C   | Other      | 8,45%     | France              |
| BNPP FD INCLUSIVE GW I C                              | Other      | 7,97%     | Luxembourg          |
| SPARINVEST ETHICAL GLOBAL VALUE                       | Other      | 7,82%     | Luxembourg          |
| SCHRODER INT-G CLIM CH-IZUSD                          | Other      | 7,81%     | Luxembourg          |
| BMO RESP GLOBAL EQ-I ACC EUR                          | Other      | 7,67%     | Luxembourg          |
| BNPP FD CL IMPACT I C                                 | Other      | 7,66%     | Luxembourg          |
| JAN HN HOR GL SUST EQ - IU2US                         | Other      | 7,65%     | Luxembourg          |
| LO FUNDS - GOLDEN AGE                                 | Other      | 6,84%     | Luxembourg          |
| PICTET-CLEAN ENERGY-JEA EE                            | Other      | 5,31%     | Luxembourg          |
| M&G LUX POSITV IMPACT-EURCIA                          | Other      | 5,07%     | Luxembourg          |
| M&G LUX GLOBAL LISTED INFRA FUND                      | Other      | 4,59%     | Luxembourg          |
| BNPP FD SUST GLB LVOL EQ I C                          | Other      | 3,59%     | Luxembourg          |

Source of data: BNP Paribas Asset Management, as at 31.07.2023

The largest investments are based on official accounting data and are based on the transaction date.

\* Any percentage differences with the financial statement portfolios result from a rounding difference.

\*\* Any difference with the portfolio statements above are coming from the use of different data's sources.

The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is: 31.07.2023



## What was the proportion of sustainability-related investments?

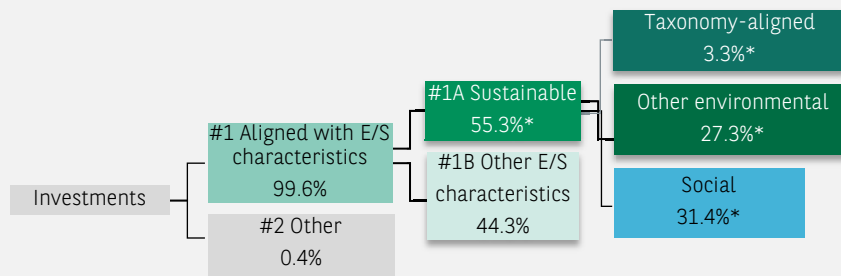
### ● What was the asset allocation ?

The proportion of the investments of the financial product used to meet the environmental or social characteristics promoted, in accordance with the binding elements of the investment strategy of the financial product is **99.6%**.

The proportion of sustainable investments of the financial product is **55.3%**.

The remaining proportion of the investments is mainly used as described under the question: "What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?"

**Asset allocation** describes the share of investments in specific assets.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers environmentally and socially sustainable investments.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

\*A portfolio security classified as sustainable investment may, taking into account all its activities, both contribute to a social objective and to an environmental objective (aligned or not with the taxonomy of the EU) and the figures shown take this into account. However, the same issuer can only be recognised once for sustainable investments (#1A Sustainable).

● *In which economic sectors were the investments made ?*

| Sectors         | % Asset |
|-----------------|---------|
| Other           | 50,63%  |
| Funds           | 41,42%  |
| Financials      | 3,99%   |
| Cash            | 3,86%   |
| Forex contracts | 0,07%   |
| Government      | 0,02%   |

Source of data: BNP Paribas Asset Management, as at 31.07.2023  
The largest investments are based on official accounting data and are based on the transaction date.



**To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?**

The financial product did not commit itself to having a minimum proportion of sustainable investments with an environmental objective in economic activities that are considered environmentally sustainable within the meaning of the EU Taxonomy, but did do so.

The two graphs below illustrate the extent to which sustainable investments with an environmental objective are aligned with the EU Taxonomy and contribute to the environmental objectives of climate change mitigation and adaptation.

The management company is improving its systems for collecting data in line with the EU Taxonomy to ensure the accuracy and adequacy of published sustainability information under the European Taxonomy Regulation. Further updates of the prospectus and the alignment of commitments with the EU Taxonomy may be made accordingly.

Economic activities that are not recognised by the EU taxonomy are not necessarily harmful to the environment or unsustainable. Moreover, not all activities that can make a substantial contribution to environmental and social objectives are yet integrated into the EU Taxonomy.

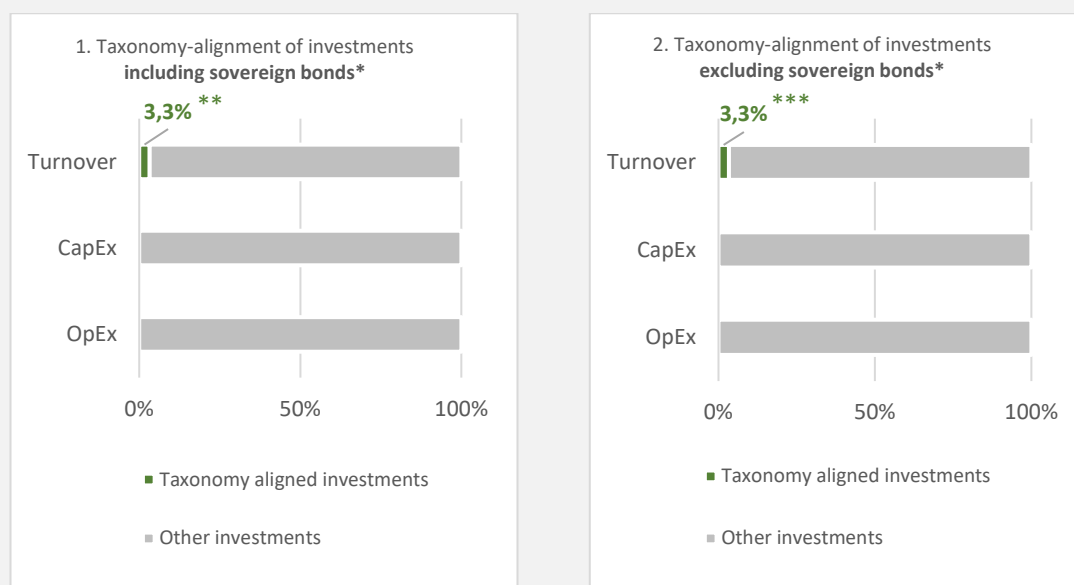
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

● **Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy <sup>1</sup>?**

- Yes:
  - In fossil gas
  - In nuclear energy
- ✘ No:

At the date of closure of the accounting year and preparation of the annual report, the data are not available and the management company does not have the information relating to the previous year.

*The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.*



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

\*\* Real taxonomy aligned

\*\*\* Real taxonomy aligned. At the date of this periodic information document, the management company does not have all the necessary data to determine the alignment of investments with the taxonomy excluding sovereign bonds. The percentage of alignment of investments with the taxonomy including sovereign bonds being by construction a real minimum proportion, this same figure is used accordingly.


Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies.
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

 are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852.

● ***What was the share of investments made in transitional and enabling activities?***

The share of investments in transitional and enabling activities within the meaning of the Regulations Taxonomy is 0% for transitional activities and 0% for enabling activities.

● ***How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods ?***

Not applicable for the first periodic report.



**What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?**

The share of sustainable investments with an environmental objective that are not aligned with the European Taxonomy Regulation is **27.3%**.

The management company is improving its systems for collecting data in line with the EU Taxonomy to ensure the accuracy and adequacy of published sustainability information under the European Taxonomy Regulation. Meanwhile, the financial product will invest in sustainable investments whose environmental objective is not aligned with the EU Taxonomy.



**What was the share of socially sustainable investments?**

Socially sustainable investments represent **31.4%** of the financial product.



**What investments were included under 'other', what was their purpose and were there any minimum environmental or social safeguards?**

The remaining proportion of the investments may include :

- For internal funds, the proportion of assets that are not used to meet the environmental or social characteristics promoted by the financial product. These assets are used for investment purposes, or
- For external funds, the proportion of assets that do not attain the minimum standard to meet environmental or social characteristics promoted by the underlying fund, according to third-party asset managers and index providers reporting, or
- instruments which are mainly used for liquidity, efficient portfolio management, and/or hedging purposes, notably cash, deposits and derivatives.

In any case, the investment manager will ensure that those investments are made while maintaining the improvement of the ESG profile of the financial product. In addition, those investments are made in compliance with our internal processes, including the following minimum environmental or social safeguards:

- the risk management policy. The risk management policy comprises procedures as are necessary to enable the management company to assess for each financial product it manages the exposure of that product to market, liquidity, sustainability and counterparty risks. And
- the RBC policy, where applicable, through the exclusion of companies involved in controversies due to poor practices related to human and labour rights, environment, and corruption, as well as companies operating in sensitive sectors (tobacco, coal, controversial weapons, asbestos,...), as these companies are deemed to be in violation of international norms, or to cause unacceptable harm to society and/or the environment.





## What actions have been taken to meet the environmental and/or social characteristics during the reference period ?

- The financial product shall invest through internal funds in compliance with the RBC Policy by excluding companies involved in controversies due to poor practices related to human and labor rights, environment, and corruption, as well as companies operating in sensitive sectors (tobacco, coal, controversial weapons, asbestos,...), as these companies are deemed to be in violation of international norms, or to cause unacceptable harm to society and/or the environment.

More information on the RBC Policy, and in particular criteria relating to sectoral exclusions, can be found on the website of the investment manager: [Sustainability documents - BNPP AM Corporate English \(bnpparibas-am.com\)](https://www.bnpparibas-am.com/en/sustainability-documents/);

- The financial product shall invest, through internal and/or external active and/or passive funds, at least 75% of its assets in funds categorised as Article 8 and Article 9 under the SFDR regulation (excluding ancillary liquid assets).
- The financial product shall invest at least 15% of its assets in “sustainable investments” as defined in Article 2 (17) of the SFDR regulation. Criteria to qualify an investment as “sustainable investment” are indicated in the above question “What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?” and the quantitative and qualitative thresholds are mentioned in the main part of the Prospectus.

In addition, the management company has implemented a voting and engagement policy. Several examples of commitments are detailed in the vote and commitment section of the Sustainability Report. These documents are available at the following link: <https://www.bnpparibas-am.com/en/sustainability-documents/>



## How did this financial product perform compared to the reference benchmark?

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the financial product.

- *How does the reference benchmark differ from a broad market index?*  
Not applicable
- *How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?*  
Not applicable
- *How did this financial product perform compared with the reference benchmark?*  
Not applicable
- *How did this financial product perform compared with the broad market index?*  
Not applicable

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



# VIEWPOINT



**BNP PARIBAS**  
**ASSET MANAGEMENT**

The sustainable  
investor for a  
changing world