

## Sustainability-related Product Disclosure

Information
Product Name: <b>Ostrum Total Return Credit</b> Legal Entity Identifier: <b>5493 000T0P6POOSV2O 83</b> SFDR Classification: <b>Article 8</b> Date of the document: <b>2024-12-27</b>

### (a) Summary

#### 1. Investment Objective

The investment objective of the Sub-Fund is to outperform the daily-capitalized €STR over its recommended minimum investment period of 2 years by more than 2.30% through an investment process that systematically includes Environmental, Social and Governance (“ESG”) considerations. For hedged Share Classes, the daily-capitalized €STR is adjusted to the difference between the relevant Share Class currency interest rate (as described in the section “Hedging policy” in the Chapter “SUBSCRIPTION, TRANSFER, CONVERSION AND REDEMPTION OF SHARES” and the Euro zone interest rate (Euribor 1 month) over its recommended minimum investment period of 2 years by more than 2.30%. The Sub-Fund is actively managed. The Sub-Fund's performance may be compared to the Reference Index. However, it does not aim to replicate that Reference Index and may therefore significantly deviate from it. The Reference Index + 2,30%1 can be used to determine the performance fee that will possibly be levied. The Reference Index does not intend to be consistent with the environmental or social characteristics promoted by the Sub-Fund.

#### 2. Environmental & social characteristics

The Sub-Fund promotes the environmental and social characteristics of maintaining an average ESG rating higher than its Investment Universe (50% Bloomberg Euro Aggregate Corporate TR € + 50% ICE Euro HY Constrained TR €) and avoiding issuers based on sectoral and exclusions policies including worst offenders of fundamental standards of responsibility. In addition, the Sub-Fund's GHG intensity must be lower than the one of its Investment Universe.

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-Fund

#### 3. Investment Strategy and proportion of investments

The Sub-Fund is expected to invest at least 65% of its NAV in investments that qualify as aligned with E/S characteristics (#1 Aligned with E/S characteristics).

The Sub-Fund is expected to invest at least 20% of its NAV in sustainable investments.

The Sub-Fund may invest a maximum of 35% of its NAV in investments that do not qualify as aligned with E/S characteristics (#2 Other).

The Sub-Fund's SRI investment strategy is based on the following three steps:

1. Applying an exclusion list

The Sub-Fund is required to apply sectoral and exclusion policies against:

**Controversial weapons\***

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Regulatory exclusion: emitters involved in the employment, development, production, marketing, distribution, storage or transfer of anti-personnel mines (MAP) and cluster bombs (BASM)\*

\*In accordance with the treaties signed with the French government, the funds directly managed by Ostrum Asset Management do not invest in companies that produce, sell or store anti-personnel mines and cluster bombs

#### **Worst Offenders**

Exclusion of issuers not meeting certain fundamental criteria

#### **Blacklisted states**

Exclusion of countries with strategic deficiencies in their anti-money laundering and anti-terrorist financing arrangements

#### **Oil and gas**

2022: end of new investments in companies where more than 10% of production (from unconventional or controversial activities) is related to these activities.

by 2030 : Full exit from unconventional and/or controversial oil and gas exploration and production activities.

#### **Tobacco**

Exclusion of tobacco manufacturers and producers

#### **Coal**

End of investment in enterprises according to strict criteria

## **2. Incorporating ESG factors into our research**

After excluding the most controversial issuers from the investment universe, the investment teams systematically assess whether non-financial factors have an impact on each underlying issuer's credit risk profile, in terms of both risk and opportunity, as well as their likelihood of occurrence. Non-financial factors are thus systematically incorporated into the risk assessment and the fundamental analysis of private and public issuers.

The Delegated Investment Manager then analyses a set of quantitative and qualitative indicators in the environmental, social and governance domains. The following examples are for information purposes only.

ESG ratings from external providers are used to assess the Investment Universe composed of private sector issuers

The non-financial rating of issuers, which applies to all asset classes, is based on four pillars, which allow for a pragmatic and differentiating analysis:

- Responsible governance: this pillar aims in particular to assess the organization and effectiveness of powers within each issuer (e.g. for companies, assessing the balance of power, executive remuneration, business ethics or even tax practices).
- Sustainable management of resources: this pillar makes it possible to, for example, study the environmental impacts and human capital (e.g. quality of working conditions, management of relationships with suppliers) of each issuer.
- Energy transition: this pillar makes it possible to, for example, assess each issuer's strategy with regard to the energy transition (e.g. approach to greenhouse gas reduction, response to long-term issues).
- Territorial development: this pillar makes it possible to, for example, analyze each issuer's strategy for access to basic services.

Several criteria are identified for each pillar and monitored by means of indicators collected from non-financial rating agencies. Ultimately, the Delegated Investment Manager remains the sole judge of the issuer's non-financial quality, which is expressed as a final rating of

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between 1 and 10, where an SRI rating of 1 represents high non-financial quality, and 10 represents low non-financial quality.

### 3. Applying an SRI selection process to the Sub-Fund

The Sub-Fund adopts an ESG process based on the average rating method: the Sub-Fund's average ESG rating is never lower than that of its investment universe.

The process also integrates an extra-financial upgrade objective: the Sub-Fund's GHG Intensity must be lower than the one of its investment universe.

The ESG ratings from external providers are used to assess the investment universe.

The assets of the Sub-Fund covered by extra-financial analysis are :

- 90% minimum for investment grade and sovereign securities of developed countries
- 75% minimum for high yield and emerging countries securities

Limitations of the selected approach: The Sub-Fund's article 8 approach could lead to underrepresentation in certain sectors due to poor ESG ratings or due to the application of the sectoral exclusions policy by the Delegated Investment Manager.

## 4) Data sources, methodology and limitations

The data are sourced from different data providers such as Trucost, MSCI, Vigeo, Sustainalytics and SDG Index and are integrated in the Ostrum IT Systems. The data are mainly estimated, and a few is directly sourced from issuers.

The methodology could lead to an under-representation of certain sectors due to a poor ESG rating or through the sector exclusion policy.

For the data, the limit is linked to the update of the data for the suppliers which may not reflect events occurring after the update and which may lead to a change in the data.

## 5) Due Diligence

The process is based on a review and a systematic validation of ESG criteria described in the documentation.

For the SRI accredited funds, the validation carries on an internal document (SRI clause) and on the legal documentation of the fund. An external certifier officially validates the consideration of the SRI specifications of the accreditation and the legal documentation after having performed an audit when the accreditation is requested.

For the non-accredited article 8 funds, it is carried on precontractual documents based on the information in the prospectus document.

The Risk department is in charge of the right application of the ESG strategy and ensures a continuous control of the ESG constraints for the article 8 funds, accredited or not. They participate in SRI accreditation and annual audits to make sure the accreditation criteria are well considered.

## 6) Engagement strategy

Engagement activity is an integral part of Ostrum AM's responsible investment approach. Ostrum AM's engagement strategy aims to improve business practices from an environmental, social and governance perspective. Ostrum AM thus implements via its credit analysts and/or its managers the commitment at the individual level and at the collaborative level via the ESG Strategy team.

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Ostrum AM also engages with regulators to share its vision of sustainable investing in order to improve standards and regulations in the financial sector and foster sustainable investing. You can find Ostrum AM's commitment policy by clicking on the following link: <https://www.ostrum.com/en/our-engagement-policies>

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## **(b) No sustainable investment objective**

### **Does this financial product have a sustainable investment objective?**

No

### **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

Sustainable investment is an investment in an economic activity that contributes to an environmental or social objective as long as (1) it does not cause significant harm to any of these objectives and (2) that the companies receiving the investments apply good governance practices.

As part of its sustainable investments, the portfolio may invest in green bonds, social bonds or sustainability bonds whose funds raised finance activities that contribute to an environmental and/or social objective. The portfolio may also invest in sustainability linked bonds associated with environmental and/or social indicators that, after examination by our team of sustainable bond analysts, are not 'disqualified.'

Additionally, companies whose products or services contribute to positive social or environmental economic activities through a sustainable impact indicator established according to the MSCI methodology are also considered to have a positive contribution to an E or S objective.

All these securities are then subject to study to verify that they do not significantly harm an environmental and/or social objective.

Finally, we ensure that the companies or sovereigns in which the portfolio invests apply good governance practices.

Investments going through the three steps ([1. « contributes to an environmental (E) or social (S) objective » 2. « provided that investments do not cause material harm to these objectives » (« Do Not Significant Harm » / « DNSH ») 3. « and that investments made apply good governance practices ») will be considered sustainable investments. The detailed definition is available at <https://www.ostrum.com/fr/notre-documentation-rse-et-esg#politique-esg>

### **How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?**

The Delegated Investment Manager takes into account all the Principal Adverse Impacts (the "PAI") in a quantitative way. Taking into account PAI allows The Delegated Investment Manager to verify that sustainable investments do not harm other objectives. In addition, the

Delegated Investment Manager applies its exclusion policies (especially worst offenders) and ensures a permanent monitoring of controversies.

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

PAI at the level of the Sub-Fund are taken into account at several levels as detailed in the methodology published on the Delegated Investment Manager's website <https://www.ostrum.com/sites/default/files/1-ostrum-mediatheque/esg-rse/investissement-durable-definition-ostrum-am/Ostrum%20AM%20-%20Definition%20Sustainable%20Investments-EN.pdf> and summarised below:

#### **1. Sectoral and exclusion policies**

The Delegated Investment Manager's exclusion and sectoral policies allow to remove from the investment universe any sector or issuer that fails to comply with certain criteria some of which are directly related to certain PAI (e.g. coal exclusion is related to GHG emissions). For other greenhouse gas emitting sectors, the Delegated Investment Manager has developed a climate approach that, on the one hand, leads to engagement with high emitting companies and, on the other hand, integrates greenhouse gas aspects into the ESG materiality score. To meet the "Do Not Significantly Harm" criteria, Ostrum AM also takes into account certain PAI indicators by applying its Worst Offenders Exclusion Policy that is based on the fundamental standards of responsibility: the United Nations Global Compact or the OECD Guidelines. This policy implies that the Delegated Investment Manager excludes from investments all companies, listed or not, for which are proven severe controversies to the principles defended by these international standards seriously affecting human rights, labour rights, environmental preservation and business ethics.

Similarly, Ostrum AM also takes into account certain PAI indicators by applying its controversial weapons policy. The Delegated Investment Manager's policy is consistent with the Ottawa Convention, the Oslo Treaty, the Convention on the Prohibition of Chemical Weapons, the Convention on the Prohibition of Biological Weapons, the Treaty on the Prohibition of nuclear weapons. This policy allows the Delegated Investment Manager to exclude from all portfolios the actors involved in the use, development, production, marketing, distribution, storage or transport of the following categories of weapons:

- Anti-personnel mines
- Cluster bombs
- Chemical weapons
- biological weapons
- Nuclear weapons (outside the Non-proliferation Treaty)
- And depleted uranium weapons

#### **2. Engagement policy and engagement campaigns**

Through its engagement policy and engagement campaigns, the Delegated Investment Manager tries to influence companies to limit the negative impact of its investment decisions on Environmental, social, respect for human rights and the fight against corruption issues.

#### **3. MSCI methodology to strengthen compliance with DNSH**

Moreover, the Delegated Investment Manager uses the MSCI methodology to apply an additional filter, implying the exclusion of companies that may have a positive E/S contribution but that :

- violates global standards such as UNGC or OECD or
- has an orange or red controversy note or
- is involved in activities related to significant damage or

- is involved in one of the following sectors: tobacco producer, controversial weapons and thermal coal

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

The Delegated Investment Manager applies its exclusion policies (especially worst offenders) and ensures a permanent monitoring of controversies.

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**(c) Environmental or social characteristics of the financial product**

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**(d) Investment strategy**

**What investment strategy does this financial product follow?**

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Several criteria are identified for each pillar and monitored by means of indicators collected from non-financial rating agencies. Ultimately, the Delegated Investment Manager remains the sole judge of the issuer's non-financial quality, which is expressed as a final rating of between 1 and 10, where an SRI rating of 1 represents high non-financial quality, and 10 represents low non-financial quality.

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The assets of the Sub-Fund covered by extra-financial analysis are :

- 90% minimum for investment grade and sovereign securities of developed countries
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Limitations of the selected approach: The Sub-Fund's article 8 approach could lead to underrepresentation in certain sectors due to poor ESG ratings or due to the application of the sectoral exclusions policy by the Delegated Investment Manager.

**What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?**

- the Sub-Fund maintains an average ESG rating higher than the one of its Investment Universe

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- the Sub-Fund maintains an GHG Intensity lower than the one of its Investment Universe.
- No target investment should breach the sectoral and exclusion policies.

**What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?**

There is no committed minimum rate to reduce the scope of the investments considered.

**What is the policy to assess good governance practices of the investee companies?**

The Delegated Investment Manager applies its exclusion policy (especially worst offenders) and ensures a permanent monitoring of controversies. In addition, the Delegated Investment Manager will, as part of the responsible governance pillar forming part of the investment strategy, assess the organisation and effectiveness of powers within each issuer (e.g. for companies, assessing the balance of power, executive remuneration, business ethics or even tax practices).

The governance practices are taken into account in the analysis as well as in the selection of issuers carried out by the Ostrum Asset Management,

1. The 'worst offenders' policy in order to exclude all companies for which there have been severe controversies in accordance with commonly established international standards (United Nations, OECD); in particular on governance elements such as labour rights and/or business ethics (corruption, etc.);

The 'worst offenders' policy is detailed on the Delegated Investment Manager's website (<https://www.ostrum.com/en/our-sector-policies>)

2. Credit analysis, which includes the determination of the ESG materiality score specific to each private sector issuer in order to determine any impacts on the company's risk profile
3. Corporate ESG ratings are taken into account by managers in their stock selection (responsible corporate governance is one of 4 pillars of the rating methodology used).

The pillar "Responsible governance" aims in particular to assess the organization and effectiveness of powers within each issuer (e.g. for companies, assessing the balance of power, executive remuneration, business ethics or even tax practices)".

Each issuer has a global rating and a rating by pillar. Rating are updated every six months to reflect the updated indicators provided by the data providers.

## **(e) Proportion of investments**

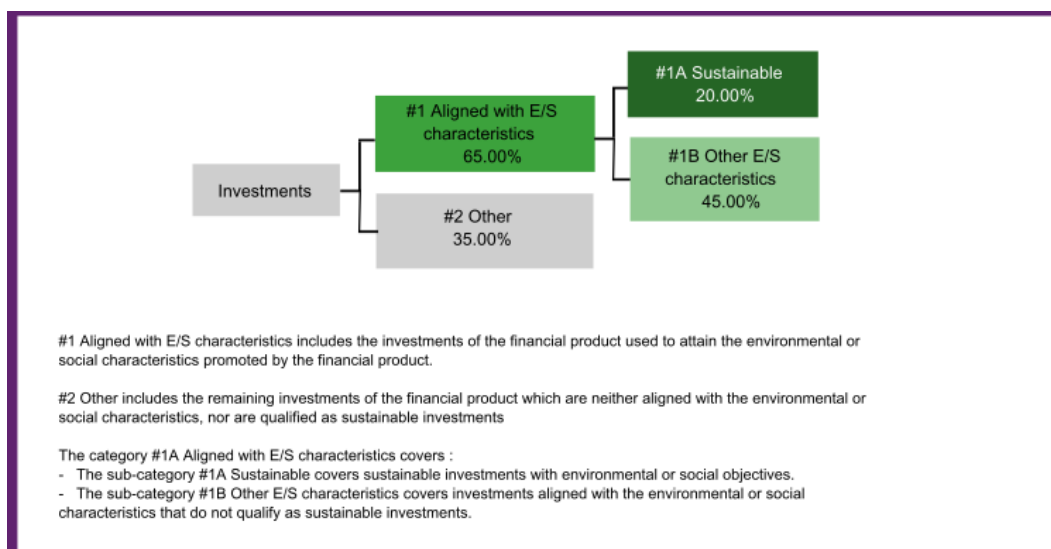
**What is the asset allocation planned for this financial product?**

The Sub-Fund is expected to invest at least 65% of its NAV in investments that qualify as aligned with E/S characteristics (#1 Aligned with E/S characteristics).

The Sub-Fund is expected to invest at least 20% of its NAV in sustainable investments.

The Sub-Fund may invest a maximum of 35% of its NAV in investments that do not qualify as aligned with E/S characteristics (#2 Other).





## How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

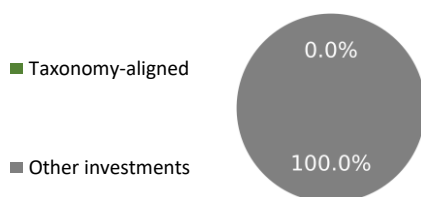
Derivatives are not used to attain the environmental or social characteristics promoted by the Sub-Fund.

## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

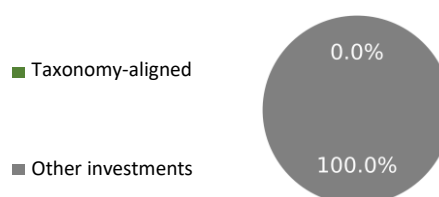
Not applicable

*The two graphs below show in green the minimum percentage of investments that are 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.*

1. Taxonomy-alignment of investments including sovereign bonds\*



2. Taxonomy-alignment of investments excluding sovereign bonds\*



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

## What is the minimum share of investments in transitional and enabling activities?

Not applicable

## What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The Sub-Fund commits to a minimum of 5% of sustainable investments with an environmental objective. These investments could be aligned with the EU Taxonomy but the Delegated

Investment Manager is not currently in a position to specify the exact proportion of the Sub-Fund's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position is kept under review as the underlying rules are finalized and the availability of reliable data increases over time.

**What investments are included under "#2 others"/"#2 Not sustainable", what is their purpose and are there any minimum environmental or social safeguards?**

The following investments are included in "#2 other": assets not covered asset by an ESG rating, cash (excluding cash not invested), the proportion of UCITS not aligned with E/S characteristics, derivatives traded on a regulated or over the counter markets for hedging and/or exposure purposes, repurchase and revers repurchase agreements for cash management purposes and to optimise the Sub-Fund's income and performance. Information on the list of assets classes and financial instruments and their use can be found in the Prospectus. Minimum environmental or social safeguards are not systematically applied.

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**(f) Monitoring of environmental or social characteristic**

- Average ESG rating of the Sub-Fund
- Average ESG rating of the Investment Universe
- GHG Intensity of the Sub-Fund
- GHG Intensity of the Investment Universe

The environmental or social characteristics and the sustainability indicators are monitored by the portfolio managers through their Portfolio Management Systems and by the Risk department through their dedicated tools. The indicators are then reported in different forms such as monthly factsheets and dedicated SRI label reports.

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**(g) Methodologies**

Ostrum applies an exclusion policy of controversial issuers thanks to sectorial and exclusion policies and controversies management. This exclusion policy represents a major pillar in the global ESG Ostrum policy and specifically for the methodology which aims at attaining environmental and social characteristics.

The second pillar is around the ESG integration applied by Ostrum by leveraging different ESG data providers which reinforces this methodology through different controls of E/S characteristics for the different regulations or contractual agreements (SFDR article 8; SRI accreditation, ...).

For the article 8 products which are SRI accredited, the control undertaken by Ostrum for the SRI accreditation allows to:

- for the funds with an average score methodology, make sure that the average ESG score of the portfolio is above to the investment universe filtered of the worst 20% issuers in terms of ESG (including the most controversial issuers defined by Ostrum in its sectorial and exclusion policies and the bottom issuers);
  - for the funds with an exclusion methodology, make sure that the investments are done on an universe reduced of the 20% bottom issuers (this 20% includes the most controversial issuers defined by Ostrum in its sectorial and exclusion policies and the bottom issuers)
  - make sure that the portfolio overperforms its filtered investment universe defined by the SRI accreditation framework on the E/S indicators if these indicators are the ones to overperform (for instance: carbon intensity, government spending on health and education)
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For the article 8 products which are not SRI accredited, Ostrum defined an approach allowing that the average ESG score of the portfolio is better than the investment universe one while ensuring a minimal threshold of the ESG portfolio coverage.

Beyond these two processes, there is a control of ESG contractual constraints which allows to ensure the attainment of E/S characteristics (for instance, decrease of intensity carbon, ESG overperformance of the portfolio vs. its investment universe).

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#### **(h) Data sources and processing**

The data are sourced from different data providers such as Trucost, MSCI, Vigeo, Sustainalytics and SDG Index and are integrated in the Ostrum IT Systems. The data are mainly estimated, and a few are directly sourced from issuers.

<https://www.spglobal.com/esg/trucost>

<https://www.msci.com/>

<https://www.moodys.com/>

<https://www.sustainalytics.com/>

<https://www.sdgindex.org/>

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#### **(i) Limitations to methodologies and data**

The methodology could lead to an under-representation of certain sectors due to a poor ESG score or else through the sectorial and exclusion policies.

For the data, the limitation is around the periodical updates done by the providers which could not reflect events that took place after the updates (and such events could lead to a change of data).

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#### **(j) Due diligence**

The process is based on a review and a systematic validation of ESG criteria described in the documentation. For the SRI accredited funds, the validation carries on an internal document (SRI clause) and on the legal documentation of the fund. An external certifier officially validates the consideration of the SRI specifications of the accreditation and the legal documentation after having performed an audit when the accreditation is requested.

For the non-accredited article 8 funds, it is carried on precontractual documents based on the information in the prospectus document.

The Risk department is in charge of the right application of the ESG strategy and ensures a continuous control of the ESG constraints for the article 8 funds, accredited or not. They participate in SRI accreditation and annual audits to make sure the accreditation criteria are well considered.

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#### **(k) Engagement policies**

**Is engagement part of the environmental or social investment strategy?**

Yes

No ☒

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**If so, what are the engagement policies? (Including any management procedures applicable to sustainability-related controversies in investee companies)**

<https://www.ostrum.com/fr/nos-politiques-dengagement>

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**(l) Designated reference benchmark (if applicable)**

**Is a specific index designated as a reference benchmark to meet the sustainable investment objective?**

Not applicable

**How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?**

Not applicable

**How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?**

Not applicable

**How does the designated index differ from a relevant broad market index?**

Not applicable

**Where can the methodology used for the calculation of the designated index be found?**

Not applicable

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**(m) Additional Information**

<https://www.im.natixis.com/en-intl/funds>

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*Disclaimer : This document is issued to disclose sustainability-related information on this product, in relation to the Article 10 of the EU Sustainable Finance Disclosure Regulation (SFDR). Please refer to the prospectus of the fund and to the KIID before making any final investment decisions.*