




Gateway		Principle PRI 1, 2, 3
Monetary		
Type of engagement	Reason for interaction	
Individual/ internal staff engagements	<input checked="" type="checkbox"/> To support investment decisionmaking in & company's material ESG issues <input checked="" type="checkbox"/> To influence corporate practice or identify the need for a material or other issue <input type="checkbox"/> To engage investor ESG advisors <input type="checkbox"/> Other: specify	
Collaborative engagements	<input type="checkbox"/> To support investment decisionmaking in & company's material ESG issues <input type="checkbox"/> To influence corporate practice or identify the need for a material or other issue <input type="checkbox"/> We do not engage via internal staff	
Service provider engagements	<input type="checkbox"/> To support investment decisionmaking in & company's material ESG issues <input type="checkbox"/> To influence corporate practice or identify the need for a material or other issue <input type="checkbox"/> We do not engage via collaborative engagements	

RI TRANSPARENCY REPORT

2016

Sycomore Asset Management

About this report

The PRI Reporting Framework is a key step in the journey towards building a common language and industry standard for reporting responsible investment (RI) activities. This RI Transparency Report is one of the key outputs of this Framework. Its primary objective is to enable signatory transparency on RI activities and facilitate dialogue between investors and their clients, beneficiaries and other stakeholders. A copy of this report will be publicly disclosed for all reporting signatories on the [PRI website](#), ensuring accountability of the PRI Initiative and its signatories.

This report is an export of the individual Signatory organisation's response to the PRI during the 2016 reporting cycle. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information. As a result, the reports can be extensive. However, to help easily locate information, there is a **Principles index** which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

Understanding the Principles Index

The Principles Index summarises the response status for the individual indicators and modules and shows how these relate to the six [Principles for Responsible Investment](#). It can be used by stakeholders as an 'at-a-glance' summary of reported information and to identify particular themes or areas of interest.

Indicators can refer to one or more Principles. Some indicators are not specific to any Principle. These are highlighted in the 'General' column. When multiple Principles are covered across numerous indicators, in order to avoid repetition, only the main Principle covered is highlighted.

All indicators within a module are presented below. The status of indicators is shown with the following symbols:

Symbol	Status
✓	The signatory has completed all mandatory parts of this indicator
☑	The signatory has completed some parts of this indicator
🔒	This indicator was not relevant for this signatory
-	The signatory did not complete any part of this indicator
Ⓜ	The signatory has flagged this indicator for internal review

Within the table, indicators marked in blue are mandatory to complete. Indicators marked in grey are voluntary to complete.

Principles Index

Organisational Overview				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
OO 01	Signatory category and services	✓	Public							✓
OO 02	Headquarters and operational countries	✓	Public							✓
OO 03	Subsidiaries that are separate PRI signatories	✓	Public							✓
OO 04	Reporting year and AUM	✓	Public							✓
OO 05	Breakdown of AUM by asset class	✓	Asset mix disclosed in OO 06							✓
OO 06	How would you like to disclose your asset class mix	✓	Public							✓
OO 07	Fixed income AUM breakdown	✓	Public							✓
OO 08	Segregated mandates or pooled funds	✓	Public							✓
OO 09	Breakdown of AUM by market	✓	Public							✓
OO 10	Additional information about organisation	✓	Public							✓
OO 11	RI activities for listed equities	✓	Public							✓
OO 12	RI activities in other asset classes	✓	Public							✓
OO 13	Modules and sections required to complete	✓	Public							✓

Strategy and Governance				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
SG 01	RI policy and coverage	✓	Public							✓
SG 02	Publicly available RI policy or guidance documents	✓	Public							✓
SG 03	Conflicts of interest	✓	Public							✓
SG 04	RI goals and objectives	✓	Public							✓
SG 05	Main goals/objectives this year	✓	Public							✓
SG 06	RI roles and responsibilities	✓	Public							✓
SG 07	RI in performance management, reward and/or personal development	✓	Public							✓
SG 08	Collaborative organisations / initiatives	✓	Public				✓	✓		
SG 09	Promoting RI independently	✓	Public				✓			
SG 10	Dialogue with public policy makers or standard setters	✓	Public				✓	✓	✓	
SG 11	ESG issues in strategic asset allocation	✓	Public	✓						
SG 12	Long term investment risks and opportunity	✓	Public	✓						
SG 13	Allocation of assets to environmental and social themed areas	✓	Public	✓						
SG 14	ESG issues for internally managed assets not reported in framework	✓	Public							✓
SG 15	ESG issues for externally managed assets not reported in framework	🔒	n/a							✓
SG 16	RI/ESG in execution and/or advisory services	🔒	n/a	✓	✓					
SG 17	Innovative features of approach to RI	✓	Public							✓
SG 18	Internal and external review and assurance of responses	✓	Public							✓

Direct - Listed Equity Incorporation				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
LEI 01	Breakdown by passive, quantitative, fundamental and other active strategies	✓	Public							✓
LEI 02	Reporting on strategies that are <10% of actively managed listed equities	🔒	n/a							✓
LEI 03	Percentage of each incorporation strategy	✓	Public	✓						
LEI 04	Type of ESG information used in investment decision	✓	Public	✓						
LEI 05	Information from engagement and/or voting used in investment decision-making	✓	Public	✓						
LEI 06	Types of screening applied	✓	Public	✓						
LEI 07	Processes to ensure screening is based on robust analysis	✓	Public	✓						
LEI 08	Processes to ensure fund criteria are not breached	✓	Public	✓						
LEI 09	Types of sustainability thematic funds/mandates	✓	Public	✓						
LEI 10	Review ESG issues while researching companies/sectors	✓	Public	✓						
LEI 11	Processes to ensure integration is based on robust analysis	✓	Public	✓						
LEI 12	Aspects of analysis ESG information is integrated into	✓	Public	✓						
LEI 13	ESG issues in index construction	🔒	n/a	✓						
LEI 14	How ESG incorporation has influenced portfolio composition	✓	Public	✓						
LEI 15	Measurement of financial and ESG outcomes of ESG incorporation	✓	Public	✓						
LEI 16	Examples of ESG issues that affected your investment view / performance	✓	Public	✓						
LEI 17	Disclosure of approach to ESG incorporation	✓	Public		✓				✓	

Direct - Listed Equity Active Ownership				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
LEA 01	Description of approach to engagement	✓	Public		✓					
LEA 02	Reasoning for interaction on ESG issues	✓	Public	✓	✓	✓				
LEA 03	Process for identifying and prioritising engagement activities	✓	Public		✓					
LEA 04	Objectives for engagement activities	✓	Public		✓					
LEA 05	Process for identifying and prioritising collaborative engagement	🔒	n/a		✓					
LEA 06	Objectives for engagement activities	🔒	n/a		✓					
LEA 07	Role in engagement process	🔒	n/a		✓		✓			
LEA 08	Monitor / discuss service provider information	🔒	n/a		✓				✓	
LEA 09	Share insights from engagements with internal/external managers	✓	Public	✓	✓					
LEA 10	Tracking number of engagements	✓	Public		✓					
LEA 11	Number of companies engaged with, intensity of engagement and effort	✓	Public		✓					
LEA 12	Engagement methods	✓	Public		✓					
LEA 13	Engagements on E, S and/or G issues	✓	Public		✓					
LEA 14	Companies changing practices / behaviour following engagement	✓	Public		✓					
LEA 15	Examples of ESG engagements	✓	Public		✓					
LEA 16	Disclosure of approach to ESG engagements	✓	Public		✓				✓	
LEA 17	Voting policy & approach	✓	Public	✓	✓	✓				
LEA 18	Typical approach to (proxy) voting decisions	✓	Public		✓					
LEA 19	Percentage of voting recommendations reviewed	🔒	n/a		✓					
LEA 20	Confirmation of votes	✓	Public		✓					
LEA 21	Securities lending programme	✓	Public		✓					
LEA 22	Informing companies of the rationale of abstaining/voting against management	✓	Public		✓					
LEA 23	Percentage of (proxy) votes cast	✓	Public		✓					
LEA 24	Proportion of ballot items that were for/against/abstentions	✓	Public		✓					
LEA 25	Shareholder resolutions	✓	Public		✓					
LEA 26	Examples of (proxy) voting activities	-	n/a		✓					
LEA 27	Disclosing voting activities	✓	Public		✓				✓	

Direct - Fixed Income				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
FI 01	Breakdown by passive,active strategies	✓	Public							✓
FI 02	Option to report on <10% assets	🔒	n/a							✓
FI 03	Breakdown by market and credit quality	✓	Public							✓
FI 04	Incorporation strategies applied	✓	Public	✓						
FI 05	ESG issues and issuer research	✓	Public	✓						
FI 06	Processes to ensure analysis is robust	✓	Public	✓						
FI 07	Types of screening applied	✓	Public	✓						
FI 08	Negative screening - overview and rationale	✓	Public	✓						
FI 09	Examples of ESG factors in screening process	✓	Public	✓						
FI 10	Screening - ensuring criteria are met	✓	Public	✓						
FI 11	Thematic investing - overview	🔒	n/a	✓						
FI 12	Thematic investing - themed bond processes	🔒	n/a	✓						
FI 13	Thematic investing - assessing impact	🔒	n/a	✓						
FI 14	Integration overview	✓	Public	✓						
FI 15	Integration - ESG information in investment processes	✓	Public	✓						
FI 16	Integration - E,S and G issues reviewed	✓	Public	✓						
FI 17	ESG incorporation in passive funds	🔒	n/a	✓						
FI 18	Engagement overview and coverage	✓	Public		✓					
FI 19	Engagement method	🔒	n/a	✓	✓					
FI 20	Engagement policy disclosure	🔒	n/a	✓	✓					
FI 21	Financial/ESG performance	✓	Public							✓
FI 22	Examples - ESG incorporation or engagement	-	n/a	✓	✓					
FI 23	Communications	✓	Public		✓				✓	

Sycomore Asset Management

Reported Information

Public version

Organisational Overview

PRI disclaimer

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Basic Information

OO 01	Mandatory	Gateway/Peering	General
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OO 01.1 Select the services you offer.

Fund management

% of assets under management (AUM) in ranges

- <10%
- 10-50%
- >50%

Fund of funds, manager of managers, sub-advised products

Other, specify

Execution and advisory services

OO 01.2 Additional information. [Optional]

Sycomore Asset Management is one of the top independent investment firms in France. It focuses on a single business: third-party asset management.

As of 31/12/2015, Sycomore Asset Management has 3.2 billion euros in assets under management through UCITS open-ended funds and segregated mandates.

OO 02	Mandatory	Peering	General
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OO 02.1 Select the location of your organisation's headquarters.

France

OO 02.2 Indicate the number of countries in which you have offices (including your headquarters).

- 1
- 2-5
- 6-10
- >10

OO 02.3 Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).

FTE

44

OO 03	Mandatory	Descriptive	General
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OO 03.1

Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.

Yes

No

OO 04

Mandatory

Gateway/Peering

General

OO 04.1

Indicate the year end date for your reporting year.

31/12/2015

OO 04.2

Indicate your total AUM at the end of your reporting year, excluding subsidiaries you have chosen not to report on, and advisory/execution only assets.

	trillions	billions	millions	thousands	hundreds
Total AUM		3	380	000	000
Currency	EUR				
Assets in USD		3	684	895	674

OO 04.5

Additional information. [Optional]

OO 06

Mandatory

Descriptive

General

OO 06.1

To contextualise your responses to the public, indicate how you would like to disclose your asset class mix.

Publish our asset class mix as percentage breakdown

Publish our asset class mix as broad ranges

	Internally managed (%)	Externally managed (%)
Listed equity	>50%	<10%
Fixed income	<10%	0
Private equity	0	0
Property	0	0

Infrastructure	0	0
Commodities	0	0
Hedge funds	0	0
Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	10-50%	0
Other (1), specify	<10%	0
Other (2), specify	0	0

'Other (1)' specified

Internally managed fund-of-funds mandates.

OO 06.2 Publish our asset class mix as per attached image [Optional].

OO 06.3 Additional information. [Optional]

Since 2001, Sycomore AM's expertise is in European equities' fundamental research and active stock-picking.

In 2012, the firm launched its first credit fund, with an SRI approach.

Sycomore AM also has an asset allocation strategy since 2009, consisting in flexible management within the overall investment universe (including emerging markets), all asset classes and multi-vehicles.

OO 07	Mandatory to Report Voluntary to Disclose	Gateway	General
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OO 07.1 Provide to the nearest 5% the percentage breakdown of your Fixed Income AUM at the end of your reporting year, using the following categories.

Internally managed	SSA	5
	Corporate (financial)	5
	Corporate (non-financial)	90
	Securitised	0
	Total	100%

OO 08	Mandatory to Report Voluntary to Disclose	Peering	General
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OO 08.1 Provide a breakdown of your organisation's externally managed assets between segregated mandates and pooled funds.

	% of externally managed assets
Segregated mandate(s)	<input type="radio"/> 0% <input type="radio"/> <10% <input checked="" type="radio"/> 10-50% <input type="radio"/> >50 %
Pooled fund(s)	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50 %
<i>Total externally managed assets</i>	<i>100%</i>

OO 09	Mandatory to Report Voluntary to Disclose	Peering	General
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OO 09.1 Indicate the breakdown of your organisation's AUM by market.

Market breakdown	% of AUM
Developed Markets	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50 %
Emerging, Frontier and Other Markets	<input type="radio"/> 0% <input checked="" type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50 %

OO 09.2

Additional information. [Optional]

We invest in listed emerging markets equities via two vehicles:

- 1) A UCITS fund of mandates, created by Sycomore AM but run by local independent investment managers based in Asia, Brazil, Eastern Europe and India
- 2) A global asset allocation strategy

OO 10

Voluntary

Descriptive

General

OO 10.1

Provide any additional information about your organisation, its mission, strategies, activities or investments which are important to contextualise your responsible investment activities.

Established in 2001, Sycomore AM is a French independent investment firm. Majority held (90%) by its founding partners and employees, it focuses on a single business: third-party asset management.

Regarding investment strategies, Sycomore AM targets long-term returns by investing in companies whose share prices do not reflect their fundamental value. Our conviction-based and opportunistic investment strategy lies on an active, non-benchmarked approach allowing us to select eurozone stocks with no biases in terms of style, sector or market cap.

The investment process is highly structured, both in terms of fundamental analysis, which is the hallmark of our approach, and portfolio construction.

Since 2001, the fundamental analysis of the companies of our investment universe has always included extra-financial criteria, such as top management quality or long-term sustainability of business models.

In 2008, the founding partners decided to extend our fundamental analysis to ESG (Environment, Social and Governance) criteria. The strategy was to hire an expert in this area, to build a specific model and to apply it to the entire investment universe, but also to redefine Sycomore AM voting policy.

In 2010, Sycomore AM decided to create a dedicated ESG team and to implement the following guidelines regarding RI and ESG issues:

- 1) to assign an ESG rating to the 700 companies that make up Sycomore AM's active investment universe,
- 2) to introduce an ESG risk premium to the whole Sycomore AM active investment universe,
- 3) to report on ESG footprint fund by fund and on demand,
- 4) to vote at meetings of all companies held in portfolios,
- 5) to backtest our ESG model every year in order to improve it,
- 6) to organise ESG events and initiatives,
- 7) to engage in dialogue with companies on ESG issues.

Five years later, Sycomore AM's ESG activities have largely expanded: Sycomore AM now has a team of four dedicated ESG professionals and our RI assets under management went from 0.4 M€ to close to 800 M€.

Gateway asset class implementation indicators

OO 11	Mandatory	Gateway	General
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OO 11.1 Select your direct or indirect ESG incorporation activities your organisation implemented, for listed equities in the reporting year.

- We incorporate ESG in our investment decisions on our internally managed assets
- We address ESG incorporation in our external manager selection, appointment and/or monitoring processes
- We do not incorporate ESG in our directly managed listed equity and/or we do not address ESG incorporation in our external manager selection, appointment and/or monitoring processes.

OO 11.2 Select your direct or indirect engagement activities your organisation implemented for listed equity in the reporting year.

- We engage with companies on ESG issues via our staff, collaborations or service providers
- We require our external managers to engage with companies on ESG issues on our behalf
- We do not engage directly and do not require external managers to engage with companies on ESG factors.

OO 11.3 Select your direct or indirect voting activities your organisation implemented for listed equity in the reporting year

- We cast our (proxy) votes directly or via dedicated voting providers
- We require our external managers to vote on our behalf
- We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf

OO 12	Mandatory	Gateway	General
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OO 12.1 Select internally managed asset classes where you implemented responsible investment into your investment decisions and/or your active ownership practices (during the reporting year)

- Fixed income – SSA
- Fixed income – corporate (financial)
- Fixed income – corporate (non-financial)
- Cash
- Other (1)
- None of the above

'Other (1)' [as defined in OO 05]

Internally managed fund-of-funds mandates.

OO 12.3 Additional information. [Optional]

We conduct thorough analysis for our investments in bonds. For our cash investments, we do not conduct any specific analysis but we favour investments in SRI monetary funds.

OO 13	Mandatory	Gateway	General
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You will need to make a selection in OO 13.1 only if you have any voluntary modules that you can choose to report on.

OO 13.1

You are only required to report on asset classes that represent 10% or more of your AUM. You may report voluntarily on any applicable modules or sections by selecting them from the list below.

Core modules

- Organisational Overview
- Strategy and Governance

RI implementation directly or via service providers

Direct - Listed Equity incorporation

- Listed Equity incorporation

Direct - Listed Equity active ownership

- Engagements
- (Proxy) voting

Direct - Fixed Income

- Fixed income - Corporate (financial)
- Fixed income - Corporate (non-financial)

Closing module

- Closing module

OO 13.2

Additional information. [Optional]

Sycomore Asset Management

Reported Information

Public version

Strategy and Governance

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Responsible investment policy

SG 01

Mandatory

Core Assessed

General

SG 01.1

Indicate if you have an investment policy that covers your responsible investment approach.

Yes

SG 01.2

Indicate the components/types and coverage of your policy.

Select all that apply

Policy components/types	Coverage by AUM
<input checked="" type="checkbox"/> Policy setting out your overall approach <input checked="" type="checkbox"/> Formalised guidelines on environmental factors <input checked="" type="checkbox"/> Formalised guidelines on social factors <input checked="" type="checkbox"/> Formalised guidelines on corporate governance factors <input checked="" type="checkbox"/> Asset class-specific guidelines <input checked="" type="checkbox"/> Sector specific RI guidelines <input checked="" type="checkbox"/> Screening / exclusions policy <input checked="" type="checkbox"/> Engagement policy <input checked="" type="checkbox"/> (Proxy) voting policy <input type="checkbox"/> Other, specify (1) <input type="checkbox"/> Other, specify(2)	<input checked="" type="radio"/> Applicable policies cover all AUM <input type="radio"/> Applicable policies cover a majority of AUM <input type="radio"/> Applicable policies cover a minority of AUM

SG 01.3

Indicate what norms have you used to develop your RI policy.

- UN Global Compact Principles
- UN Guiding Principles on Business and Human Rights
- Universal Declaration of Human Rights
- International Bill of Human Rights
- International Labour Organization Conventions
- United Nations Convention Against Corruption
- OECD Guidelines for Multinational Enterprises
- Other, specify (1)

other (1) description

French law n° 2010-788 12 July 2010 and n° 2015-992 17 August 2015

- Other, specify (2)
- Other, specify (3)
- None of the above

SG 01.4	Provide a brief description of the key elements of your investment policy that covers your responsible investment approach [Optional].
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Sycomore AM aims to invest in companies that create sustainable value for all their stakeholders. It has developed a proprietary in-house approach to analyse key environmental, social and corporate governance (ESG) issues affecting specific equity and bond issuers.

ESG integration in valuation and thus in the investment process is a cornerstone of its responsible investment approach.

In addition to systematic screening for key ESG risks and opportunities, Sycomore AM excludes companies that violate international environmental, social or human rights norms, such as the UN Global Compact and the Universal Declaration of Human Rights. It also excludes any investments in companies involved in controversial weapons. For SRI funds, it does not invest in companies that produce weapons or weapon systems, nuclear power, GMOs and tobacco, and that derive more than 5% of their revenue from these activities.

Since 2015, Sycomore AM has a policy to vote 100% of companies it holds at the time of a general meeting regardless of geographies and shareholding.

Finally, in 2015, Sycomore AM formalised its first engagement policy and is since actively engaging with companies to promote ESG best practices.

No

SG 02	Mandatory	Core Assessed	PRI 6
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SG 02.1	Indicate which of your investment policy documents (if any) are publicly available. Provide URL and an attachment of the document.
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- Policy setting out your overall approach

	URL
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<http://www.sycomore-am.com/en/institutionnels/Our-expertise/ESG-SRI-Integration>

- Formalised guidelines on environmental factors
- Formalised guidelines on social factors
- Formalised guidelines on corporate governance factors
- Asset class-specific guidelines

	URL
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http://www.sycomore-am.com/files/shared_documents/SYCOMORE%20-%20-%20Fonds%20SSC%20-%20Code%20de%20transparence%20AGFFIR%20-%202030.06.2015_EN.pdf

- Sector specific RI guidelines
- Screening / exclusions policy

URL

http://www.sycomore-am.com/sycomore-am/files/shared_documents/Politique_exclusion_armes_controversees_2015.pdf

- Engagement policy
- (Proxy) voting policy

URL

<http://www.sycomore-am.com/en/institutionnels/Regulatory-Information>

- We do not publicly disclose our investment policy documents

SG 03	Mandatory	Core Assessed	General
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SG 03.1	Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.
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- Yes

SG 03.2	Describe your policy on managing potential conflicts of interest in the investment process.
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Sycomore AM's policy regarding potential conflicts of interest is endorsed and supervised by our compliance department, which is composed of 2 people.

Also, we have a specific section in our voting policy to prevent potential conflicts of interest. If a member of the supervisory board of a company, in which Sycomore AM is about to vote, is also an important client of Sycomore, or is a partner of Sycomore, therefore a special meeting with the fund management team is organized by the internal audit department to decide on the most appropriate decision in the best interest of Sycomore AM's clients.

- No

Objectives and strategies

SG 04	Mandatory	Gateway/Core Assessed	General
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SG 04.1	Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.
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- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad-hoc basis
- It is not reviewed

SG 04.2 | Additional information. [Optional]

Every week, there is an internal ESG meeting with development, marketing and fund managers where the objectives for responsible investment activities are discussed and reviewed. As a consequence, new objectives can be set and reviewed relatively frequently. Twice a year, there is a formal appraisal of the work carried out by the ESG team.

SG 05

Voluntary

Descriptive

General

SG 05.1 | List the main responsible investment objectives that your organisation set for the reporting year.

Responsible investment processes

- Provide training on ESG incorporation

Key performance indicator

Train all fund managers on ESG analysis.

Progress achieved

1 full day of training already carried out.

- Provide training on ESG engagement

Key performance indicator

Train junior ESG team members and fund managers to ESG engagement during one-on-one meetings.

Progress achieved

At least 20 engagement meetings already carried out.

- Improved communication of ESG activities within the organisation
- Improved engagement to encourage change with regards to management of ESG issues
- Improved ESG incorporation into investment decision making processes
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)

Financial performance of investments

- Increase portfolio performance by consideration of ESG factors
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)

ESG characteristics of investments

- Over or underweight companies based on ESG characteristics
- Improve ESG ratings of portfolio

Key performance indicator

For our SRI funds, we increased the minimal ESG scores from 2 to 2.5 out of 5.

- Setting carbon targets for portfolio
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)

Other activities

- Joining and/or participation in RI initiatives

Key performance indicator

Participated in and supported various RI initiatives and events.

Progress achieved

Sponsored the PRI academic prize and the French FIR-PRI prize.
Sponsored COP 21.

- Encouraging others to join a RI initiative
- Documentation of best practice case studies
- Using case studies to demonstrate engagement and ESG incorporation to clients
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)

Governance and human resources

SG 06	Mandatory	Core Assessed	General
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SG 06.1	Indicate the roles present in your organisation and for each, indicate whether they have oversight and/or implementation responsibilities for responsible investment.
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Roles present in your organisation

- Board members or trustees
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Chief Executive Officer (CEO), Chief Investment Officer (CIO), Investment Committee
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Other Chief-level staff or head of department, specify
 - Head of Sustainable & Responsible Investment**
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Portfolio managers
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Investment analysts
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Dedicated responsible investment staff
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- External managers or service providers
- Investor relations
- Other role, specify
- Other role, specify

SG 06.2

For the roles for which you have RI oversight/accountability or implementation responsibilities, indicate how you execute these responsibilities.

Sycomore AM's board members and partners have oversight responsibilities for Sycomore AM's RI activities. The President reviews these activities on an ongoing basis and at least once a year to establish the company's annual report.

Sycomore AM also has a dedicated RI team in charge of implementing the RI strategy and accountable for its implementation.

All fund managers and investment analysts are involved in the roll-out of RI.

SG 06.3

Indicate the number of dedicated responsible investment staff your organisation has.

Number

4

SG 07	Voluntary	Additional Assessed	General
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SG 07.1	Indicate if your organisation's performance management, reward and/or personal development processes have a responsible investment element.
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Board members/Board of trustees

- Responsible investment included in personal development and/or training plan

SG 07.2	Describe any activities undertaken during the reporting year to develop and maintain Board members' skills and knowledge in relation to responsible investment.
----------------	---

Sycamore AM's board members (4 out of 5) are part of the firm executive management (2 CIO and 2 Business Developers). In this regard, they are fully involved with the company's responsible investment policies. They have worked in close link with our Head of Sustainable & Responsible Investment to implement ESG criteria at both the fund and the corporate level.

- None of the above

Chief Executive Officer (CEO), Chief Investment Officer (CIO), Investment Committee

- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- Responsible investment included in personal development and/or training plan
- None of the above

Other C-level staff or head of department

Head of Sustainable & Responsible Investment

- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- Responsible investment included in personal development and/or training plan
- None of the above

Portfolio managers

- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- Responsible investment included in personal development and/or training plan
- None of the above

Investment analysts

- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- Responsible investment included in personal development and/or training plan
- None of the above

Dedicated responsible investment staff

- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- Responsible investment included in personal development and/or training plan
- None of the above

SG 07.3	Provide any additional information on your organisation’s performance management, reward and/or personal development processes in relation to responsible investment.
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All portfolio managers and investment analysts are being training on ESG analysis. Carrying out ESG screening is now part of all investment professionals' objectives.

Promoting responsible investment

SG 08	Mandatory	Core Assessed	PRI 4,5
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New selection options have been added to this indicator. Please review your prefilled responses carefully.

SG 08.1	Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played.
----------------	---

Select all that apply

- Principles for Responsible Investment

	Your organisation’s role in the initiative during the reporting period (see definitions)
--	--

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

Sycomore AM sponsored the PRI Academic Prize and actively participated in the PRI in Person conference. Sycomore AM has been a PRI signatory since July 2010 and we have published an RI report since 2011.

- AFIC – La Commission ESG
- Asian Corporate Governance Association
- Australian Council of Superannuation Investors
- BVCA – Responsible Investment Advisory Board
- CDP Climate Change

Your organisation's role in the initiative during the reporting period (see definitions)

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

Sycomore AM is a signatory of the CDP since 2013.

- CDP Forests

Your organisation's role in the initiative during the reporting period (see definitions)

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

Sycomore AM is a signatory of the CDP Forests.

- CDP Water

Your organisation's role in the initiative during the reporting period (see definitions)

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

Sycomore AM is a signatory of the CDP Water.

- CFA Institute Centre for Financial Market Integrity
- Code for Responsible Investment in SA (CRISA)
- Council of Institutional Investors (CII)
- ESG Research Australia
- Eumedion
- EVCA – Responsible Investment Roundtable
- Extractive Industries Transparency Initiative (EITI)
- Global Investors Governance Network (GIGN)
- Global Impact Investing Network (GIIN)
- Global Real Estate Sustainability Benchmark (GRESB)
- Institutional Investors Group on Climate Change (IIGCC)
- Interfaith Center on Corporate Responsibility (ICCR)
- International Corporate Governance Network (ICGN)
- Investor Group on Climate Change, Australia/New Zealand (IGCC)
- International Integrated Reporting Council (IIRC)
- Investor Network on Climate Risk (INCR)/CERES
- Local Authority Pension Fund Forum
- Principles for Financial Action for the 21st Century
- Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify
FIR (Forum pour l'Investissement Responsable) - Frenchsif

Your organisation's role in the initiative during the reporting period (see definitions)

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

Sycomore AM has been a sponsor and jury member of the FIR-PRI academic award on SRI research since 2011.

- Shareholder Association for Research and Education (Share)
- United Nations Environmental Program Finance Initiative (UNEP FI)
- United Nations Global Compact
- Other collaborative organisation/initiative, specify
AFG (Association Française de la Gestion financière)

Your organisation's role in the initiative during the reporting year (see definitions)

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

Bertille Knuckey, Sycomore AM's Head of Sustainable & Responsible Investment, is a member of the RI commission of the AFG. She is also actively involved in several sub-committees (carbon footprinting, Article 173 etc.)

- Other collaborative organisation/initiative, specify
SFAF (Société Française des Analystes Financiers - French CIIA)

Your organisation's role in the initiative during the reporting year (see definitions)

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

Alban Préaubert, a Sycomore AM's fund manager and ESG analyst, is a member of the Sustainable Development commission of the SFAF.

- Other collaborative organisation/initiative, specify
New City Initiative

Your organisation's role in the initiative during the reporting year (see definitions)

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

Sycomore AM's President, Laurent Deltour, is a member of the New City Initiative, a think tank that aims to restore society's trust in the financial sector.

- Other collaborative organisation/initiative, specify
COP 21

Your organisation's role in the initiative during the reporting year (see definitions)

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

Sycomore AM sponsored COP 21 and organized a roundtable for this event.

SG 08.2 Additional information. [Optional]

SG 09 **Mandatory** **Core Assessed** **PRI 4**

SG 09.1 Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.

Yes

SG 09.2 Indicate which of the following actions your organisation has taken to promote responsible investment, independently of collaborative initiatives.

- Provided or supported education or training programmes for clients, investment managers, broker/dealers, investment consultants, legal advisers or other investment organisations
- Provided financial support for academic or industry research on responsible investment
- Encouraged better transparency and disclosure of responsible investment practices across the investment industry
- Spoke publicly at events and conferences to promote responsible investment
- Wrote and published in-house research papers on responsible investment
- Encouraged the adoption of the PRI
- Wrote articles on responsible investment in the media.
- Other, specify

No

SG 09.3 Additional information. [Optional]

- Sycomore AM arranges various events to promote RI. In particular, Sycomore AM organizes since 2011 a day dedicated to RI, which gathers over a hundred stakeholders. For example, in 2014, we collaborated with French company Bouygues Immobilier and offered our stakeholders to participate to an on-site visit.
- Sycomore AM regularly delivers training sessions on RI and ESG to French financial advisors, academic partners, students etc.
- Sycomore AM's fund managers regularly take part in various roundtables on RI.

- Sycomore AM has sponsored two academic prizes in 2015: the FIR-PRI award (academic research on RI) and the PRI academic prize.
- Sycomore AM regularly contributes to RI press articles and academic publications.
- Sycomore AM publishes, three to four times a year, a RI newsletter on specific RI topics.

SG 10	Voluntary	Additional Assessed	PRI 4,5,6
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SG 10.1	Indicate if your organisation - individually or in collaboration with others - conducted dialogue with public policy makers or regulators in support of responsible investment in the reporting year.
----------------	---

- Yes
 - Yes, individually
 - Yes, in collaboration with others

SG 10.2	Select the methods you have used.
----------------	-----------------------------------

- Endorsed written submissions to governments, regulators or public policy developed by others
- Drafted your own written submissions to governments, regulators or public policy markers
- Participated in face-to-face meetings with government members or officials to discuss policy
- Other, specify

SG 10.3	Where you have made written submissions (individually or collaboratively) to governments and regulatory authorities, indicate if these are publicly available.
----------------	--

- Yes, publicly available
- No
- No

Implementation not in other modules

SG 11	Voluntary	Descriptive	PRI 1
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SG 11.1	Indicate if your organisation executes scenario analysis and/or modelling in which the risk profile of future ESG trends at portfolio level is calculated.
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- Yes
- No

SG 11.2	Indicate if your organisation considers ESG issues in strategic asset allocation and/or allocation of assets between sectors or geographic markets.
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- Yes
- No

SG 12	Mandatory to Report Voluntary to Disclose	Descriptive	PRI 1
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SG 12.1

Some investment risks and opportunities arise as a result of long term trends. Indicate which of the following you consider.

- Changing demographics
- Climate change

SG 12.2

Indicate which of the following activities you have undertaken to respond to climate change risk and opportunity

- Established a climate change sensitive or climate change integrated asset allocation strategy
- Targeted low carbon or climate resilient investments
- Reduced portfolio exposure to emissions intensive or fossil fuel holdings
- Used emissions data or analysis to inform investment decision making
- Sought climate change integration by companies
- Sought climate supportive policy from governments
- Other, specify
- None of the above

SG 12.3

Indicate which of the following tools you use to manage emissions risks and opportunities

- Carbon footprinting
 - Scenario testing
 - Disclosure on emissions risk to clients/trustees/management/beneficiaries
 - Target setting for emissions risk reduction
 - Encourage internal and/or external portfolio managers to monitor emissions risk
 - Emissions risk monitoring and reporting are formalised into contracts when appointing managers
 - Other, specify
 - None of the above
- Resource scarcity
 - Technology developments
 - Other, specify(1)
 - Other, specify(2)
 - None of the above

SG 12.5

Additional information [Optional]

In 2015, Sycomore AM launched a new fund, Sycomore Eco Solutions, that aims to invest in companies that are playing an important role in the ecological and energy transition.

In addition, we adjusted our environmental analysis module in order to incorporate more detailed climate-related (including, when possible, a measure of all three scopes of analysis and avoided emissions) and environmental assessments.

SG 13**Mandatory to Report Voluntary to Disclose****Descriptive****PRI 1**

SG 13.1

Indicate if your organisation allocates assets to, or manages, funds based on specific environmental and social themed areas.

Yes

SG 13.2

Indicate the percentage of your total AUM invested in environmental and social themed areas.

% of total AUM

1

SG 13.3

Please specify which thematic area(s) you invest in and provide a brief description.

Area

Clean technology (including renewable energy)

Asset class invested

- Listed equity
- Fixed income - Corporate (financial)
- Fixed income - Corporate (non-financial)
- Cash

Brief description of investment

Sycomore AM invests in this thematic area through several products namely Sycomore Eco Solutions as well as other SRI funds. We have developed a detailed internal methodology to deal with these investments.

Green buildings

Asset class invested

- Listed equity
- Fixed income - Corporate (financial)
- Fixed income - Corporate (non-financial)
- Cash

Brief description of investment

Sycomore AM invests in this thematic area through several products namely Sycomore Eco Solutions as well as other SRI funds. We have developed a detailed internal methodology to deal with these investments.

Sustainable forestry

Asset class invested

- Listed equity
- Fixed income - Corporate (financial)
- Fixed income - Corporate (non-financial)
- Cash

Brief description of investment

Sycomore AM invests in this thematic area through several products namely Sycomore Eco Solutions as well as other SRI funds. We have developed a detailed internal methodology to deal with these investments.

- Sustainable agriculture

Asset class invested

- Listed equity
- Fixed income - Corporate (financial)
- Fixed income - Corporate (non-financial)
- Cash

Brief description of investment

Sycomore AM invests in this thematic area through several products namely Sycomore Eco Solutions as well as other SRI funds. We have developed a detailed internal methodology to deal with these investments.

- Microfinance
- SME financing
- Social enterprise / community investing
- Affordable housing
- Education
- Global health
- Water

Asset class invested

- Listed equity
- Fixed income - Corporate (financial)
- Fixed income - Corporate (non-financial)
- Cash

Brief description of investment

Sycomore AM invests in this thematic area through several products namely Sycomore Eco Solutions as well as other SRI funds. We have developed a detailed internal methodology to deal with these investments.

Other area, specify

Human capital

Asset class invested

- Listed equity
- Fixed income - Corporate (financial)
- Fixed income - Corporate (non-financial)
- Cash

Brief description of investment

Sycomore AM invests in this thematic area through several products namely Sycomore Happy@Work as well as other SRI funds. We have developed a detailed internal methodology to deal with these investments.

No

SG 13.4	Additional information [Optional].
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In 2015, Sycomore AM launched two thematic funds: Sycomore Eco Solutions that focuses on companies offering solutions to the ecological and energy transition, and Sycomore Happy@Work based on employee satisfaction and well-being as a key performance driver for companies over the long term.

SG 14	Mandatory	Descriptive	General
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SG 14.1	Describe how you address ESG issues for internally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.
----------------	--

Asset Class	Describe what processes are in place and the outputs or outcomes achieved
Fixed income - Corporate (financial)	Sycomore AM integrates ESG issues in fixed income analysis as in equity. Since 2012, Sycomore AM has an SRI fixed income fund, Sycomore Sélection Crédit. We have defined 6 specific ESG criteria for this fund, focusing on ESG risk mitigation.
Cash	Sycomore AM favours the investment of cash in SRI monetary funds.

Innovation

SG 17	Voluntary	Descriptive	General
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SG 17.1	Indicate whether any specific features of your approach to responsible investment are particularly innovative.
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Yes

SG 17.2	Describe any specific features of your approach to responsible investment that you believe are particularly innovative.
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- ESG risk premium: for over 8 years, ESG criteria have had a direct impact on company valuations across Sycomore AM's investment universe. Target prices through beta adjustment, required margins of safety and portfolio construction are all impacted by company ESG scores.
- Proprietary model and backtesting: every year since 2011, Sycomore AM has backtested the financial pertinence of its valuation and portfolio construction model against its ESG criteria. Our ESG integration model is unique. It is developed and maintained internally with no analysis carried out by extra-financial agencies.
- Controversies: Sycomore AM also developed its own proprietary tool for the analysis of controversies. Depending on their severity and recurrence, controversies impact company ESG scores.
- Implementation of a Corporate Sustainable Development approach within Sycomore AM and publication of a sustainability report.
- ESG reporting across all funds: since January 2012, Sycomore AM has been publishing monthly ESG reports for its entire range of long only equity and corporate bond funds.
- Carbon footprinting: since January 2015, Sycomore AM communicates the carbon footprint of all its portfolios.

No

Assurance of responses

SG 18	Voluntary	Additional Assessed	General
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SG 18.1	Indicate whether your reported information has been reviewed, validated and/or assured by internal and/or external parties.
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Yes

SG 18.2	Indicate who has reviewed, validated and/or assured your reported information.
----------------	--

- Reviewed by Board, CEO, CIO or Investment Committee
- Validated by internal audit or compliance function
- Assured by an external independent provider, specify name
- Other, specify

SG 18.3	Describe the steps you have taken to review, validate and/or assure the content of your reported information.
----------------	---

All reported information has been reviewed internally by our Head of Compliance, Jean-Baptiste Blanc.

No

Sycomore Asset Management

Reported Information

Public version

Direct - Listed Equity Incorporation

PRI disclaimer

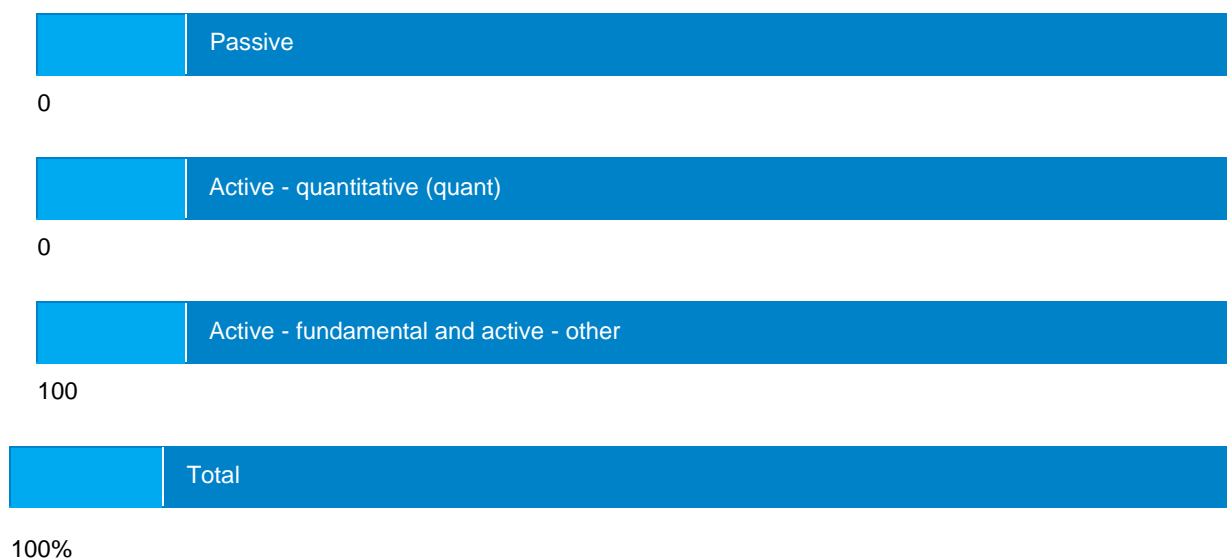
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Overview

LEI 01	Mandatory to Report Voluntary to Disclose	Gateway	General
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LEI 01.1 Provide a breakdown of your internally managed listed equities by passive, active - quantitative (quant), active - fundamental and active - other strategies.

Percentage of internally managed listed equities



LEI 01.2 Additional information. [Optional]

Sycomore AM's strategy is exclusively based on active fund management. Stock selection is the main source of alpha of Sycomore AM's investments. The sustainability of our performance relies on a rigorous and structured investment process that underpins fundamental analysis and portfolio construction.

Company analysis and valuation are processed through our database and proprietary tool SYCOVALO, which is shared by every member of the fund management team. SYCOVALO structures all stock analyses and valuation process. It incorporates:

- Quantitative data: 12 years of accounts history, 3 years of forecasts, consensus comparison, valuation ratios, profitability level and growth rates, etc.
- Qualitative data: ESG ratings, competitive environment assessments, SWOT analyses, growth perspectives, top management quality, meeting/visits reports, etc.

Among the 1,500 stocks computed within our database, approximately 700 companies are actively followed, which means that their valuation target has been updated less than 3 months before.

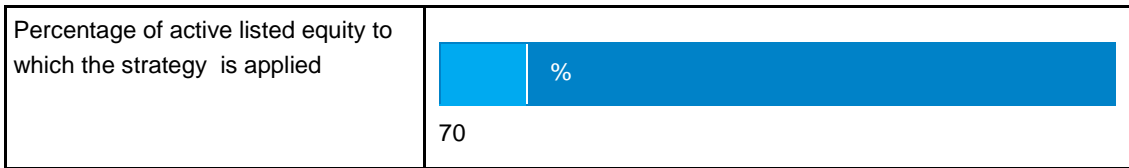
ESG incorporation in actively managed listed equities

Implementation processes

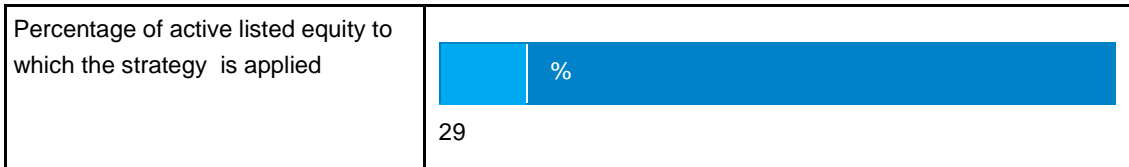
LEI 03.1 Indicate (1) which ESG incorporation strategy and/or combination of strategies you apply to your actively managed listed equities and (2) the breakdown of your actively managed listed equities by strategy or combination of strategies (+/- 5%)

ESG incorporation strategy (select all that apply)

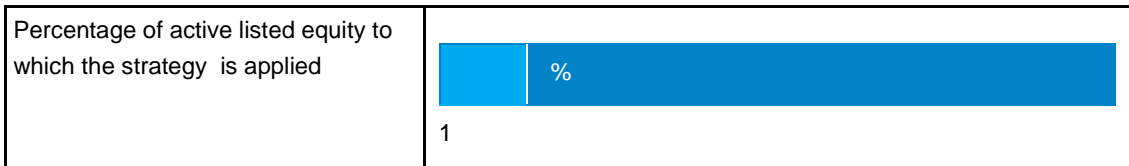
- Screening alone (i.e. not combined with any other strategies)
- Thematic alone (i.e. not combined with any other strategies)
- Integration alone (i.e. not combined with any other strategies)



- Screening + Integration strategies



- Thematic + integration strategies
- Screening + thematic strategies
- All three strategies combined



- No incorporation strategies applied

Total actively managed listed equities

100%

LEI 03.2 Describe your organisation's approach to incorporation and the reasons for choosing the particular ESG incorporation strategy/strategies.

In the investment process for all of Sycomore AM's funds, the investment team follows an integration strategy as an ESG risk premium adjust the beta of all the companies in the investment universe. Sycomore AM firmly believes that ESG analysis adds value as companies with a good understanding of ESG impacts and a strong integration of sustainability in their strategy are better placed to manage risks and benefit from related opportunities.

Sycomore Selection Responsible is Sycomore AM's main SRI equity fund with over 400 M€ AUM. Like most other SRI investment portfolios at Sycomore AM, it falls under the ESG integration and screening strategies:

1. ESG criteria are integrated to the valuation and portfolio construction process like for all other funds,

2. The fund has its own screening criteria that exclude companies with poor environmental performance, accounting risks and poor working conditions, and select companies that create jobs, protect minority shareholders and offer products and services that positively contribute to a healthy environment.

LEI 03.4	Additional information. [Optional]
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Sycomore AM's AUM split by ESG incorporation strategies:

- Screening + integration strategies = Sycomore Selection Responsible, Sycomore Selection Credit, all SRI and ESG mandates = 29%
- Thematic + screening + integration strategies = Sycomore Eco Solutions, Sycomore Happ@Work = 1%
- Integration strategies = all other assets = 70%

LEI 04	Voluntary	Additional Assessed	PRI 1
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LEI 04.1	Indicate what ESG information you use in your ESG incorporation strategies and who provides this information.
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Type of ESG information

- Raw ESG company data

Indicate who provides this information

- ESG research provider
- Sell-side
- In-house – specialised ESG analyst or team
- In-house – analyst or portfolio manager

- Company-related analysis or ratings

Indicate who provides this information

- ESG research provider
- Sell-side
- In-house – specialised ESG analyst or team
- In-house – analyst or portfolio manager

- Sector-related analysis or ratings

Indicate who provides this information

- ESG research provider
- Sell-side
- In-house – specialised ESG analyst or team
- In-house – analyst or portfolio manager

- Country-related analysis or ratings

Indicate who provides this information

- ESG research provider
- Sell-side
- In-house – specialised ESG analyst or team
- In-house – analyst or portfolio manager
- Screened stock list

Indicate who provides this information

- ESG research provider
- Sell-side
- In-house – specialised ESG analyst or team
- In-house – analyst or portfolio manager
- ESG issue-specific analysis or ratings

Indicate who provides this information

- ESG research provider
- Sell-side
- In-house – specialised ESG analyst or team
- In-house – analyst or portfolio manager
- Other, specify

We may use a network of experts (Third Bridge) to talk to company stakeholders (employees, clients, suppliers, etc.).

Indicate who provides this information

- ESG research provider
- Sell-side
- In-house – specialised ESG analyst or team
- In-house – analyst or portfolio manager

LEI 04.2	Provide a brief description of the ESG information used, highlighting any differences of sources of information across your ESG incorporation strategies.
-----------------	---

We collect data first and foremost through company annual and sustainability reports. We also use information that help us hone our analysis of companies (publications from brokers, calls with various experts, NGO publications, newspapers, social networks, etc.).

LEI 04.3	Indicate if you incentivise brokers to provide ESG research.
-----------------	--

- Yes

LEI 04.4	Describe how you incentivise brokers.
-----------------	---------------------------------------

Every year, the fund management team ranks brokers it works with on a number of issues. In the broker evaluation model, there is a specific score allocated to ESG research. Hence, brokerage fees also depend on the quality of ESG research they provide.

No

LEI 05	Voluntary	Additional Assessed	PRI 1
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LEI 05.1	Indicate if your organisation has a process through which information derived from ESG engagement and/or (proxy) voting activities is made available for use in investment decision-making.
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- Engagement
 - We have a systematic process to ensure the information is made available.
 - We occasionally make this information available.
 - We do not make this information available.
- (Proxy) voting
 - We have a systematic process to ensure the information is made available.
 - We occasionally make this information available.
 - We do not make this information available.

LEI 05.2	Additional information. [Optional]
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Sycomore AM works with ISS to cast its votes. Portfolio managers have access to the platform and are regularly informed and consulted on votes at companies held in their portfolio.

In 2015, Sycomore AM developed an engagement database whereby all engagement-related information is tracked and stored.

(A) Implementation: Screening

LEI 06	Mandatory	Descriptive	PRI 1
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LEI 06.1	Indicate and describe the type of screening you apply to your internally managed active listed equities.
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Type of screening

- Negative/exclusionary screening

Screened by

- Product
- Activity
- Sector
- Country/geographic region
- Environmental and social practices and performance
- Corporate governance

Description

1. Exclusion of all controversial weapons for all investments
In line with the Oslo and Ottawa conventions, Sycomore AM excludes any investment in controversial weapons.

2. Exclusion policy for SRI funds
It also excludes any investments in companies involved in controversial weapons. For SRI funds, it does not invest in companies that produce weapons or weapon systems, nuclear power, GMOs and tobacco, and that derive more than 5% of their revenue from these activities.

3. Negative screening for Sycomore Selection Responsible
Sycomore AM's main SRI equity fund excludes companies that do not meet the following ESG requirements:

- E: minimum environmental performance (water and energy consumption, greenhouse gases emissions, waste, energy efficiency...)
- S: minimum working conditions (average salary, training, absenteeism, turnover, working accidents, social climate...)
- G: limited accounting risks (quality of financial statements, auditors' independence, accounting irregularities...)
- ESG: a minimum ESG score

We require a minimum grade of 2.5 out of 5 on every criterion for a company to enter our investment universe.

- Positive/best-in-class screening

Screened by

- Product
- Activity
- Sector
- Country/geographic region
- Environmental and social practices and performance
- Corporate governance

Description

Sycomore AM's main SRI equity fund also selects companies that offer sustainable development opportunities:

- E: good environmental positioning of products and services (recycling, energy efficiency, sustainable building, sustainable transport...)
- S: job creation (positive average growth of the workforce over the past 3 years)
- G: protection of minority shareholders (absence of poison pills, absence of multiple classes of shares or voting rights, voting caps...)

Also, it is worth noting that for our thematic funds (Sycomore Eco Solutions and Sycomore Happy@Work), we screen our investment universe to select companies that are well positioned to benefit from the ecological and energy transition, and from the well-being of employees and the strong integration of human capital in company strategy.

Norms-based screening

Screened by

- UN Global Compact Principles
- The UN Guiding Principles on Business and Human Rights
- International Labour Organization Conventions
- United Nations Convention Against Corruption
- OECD Guidelines for Multinational Enterprises
- Other, specify

Description

Sycomore AM's SRI funds will not invest in companies that contravene international norms.

LEI 06.2	Describe how the screening criteria are established, how often the criteria are reviewed and how you notify clients and/or beneficiaries when changes are made.
-----------------	---

For our main SRI fund, the negative and positive selection criteria have been established to help the team:

1. Identify companies showing ESG risks
2. Identify companies showing sustainable development opportunities

From the first implementation of this screening strategy in 2011 until now, we never changed the screening criteria. However, we are, of course, regularly reviewing how companies score on these different criteria as we are updating our database daily. In addition, we carry out every 2 years a complete ESG review of all investee company.

LEI 06.3	Additional information. [Optional]
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LEI 07	Mandatory	Core Assessed	PRI 1
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LEI 07.1

Indicate which processes your organisation uses to ensure that screening is based on robust analysis.

- Comprehensive ESG research is undertaken or sourced to determine companies' activities and products.
- Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- External research and data used to identify companies to be excluded/included is subject to internal audit by ESG/RI staff, the internal audit function or similar
- Company ESG information/ratings are updated regularly to ensure that portfolio holdings comply with fund policies
- A committee or body with representatives independent of the individuals who conduct company research reviews some or all screening decisions
- A periodic review of the quality of the research undertaken or provided is carried out
- Other, specify
- None of the above

LEI 07.2

Additional information. [Optional]

ESG analysis of Sycomore AM's investment universe is led by the 4-people ESG team with the input of the other 11 analysts/fund managers. All investment professionals share the same investment tool named SYCOVALO. In that regard, every investment professional is responsible for the ESG analysis of companies he or she covers. This ensures an on-going quality review by professionals whose analysis is directly impacted by ESG criteria and analysis. In addition, the Head of Sustainable& Responsible Investment approves all ESG scores.

LEI 08

Voluntary

Additional Assessed

PRI 1

LEI 08.1

Indicate which processes your organisation uses to ensure that fund criteria are not breached

- Systematic checks are performed to ensure that stocks meet the funds' screening criteria.
- Automated IT systems prevent investment managers from investing in excluded stocks or those that do not meet positive screening criteria.
- Audits of fund holdings are undertaken regularly by internal audit function
- Other, specify
- None of the above

LEI 08.2

If breaches of fund screening criteria are identified - describe the process followed to correct those breaches.

Should a company held in one of Sycomore AM's SRI funds breach one or more of the fund's ESG criteria, the fund managers would sell the stock without delay (maximum 4 weeks). However, we have implemented various level of controls to prevent such events from happening.

In the case of a severe controversy (level 3 out of 3) affecting one of our SRI holdings, the fund managers would immediately sell the stock. Here are a few examples of such divestments, specifically because of controversies: Sonova (March 2011), Standard Chartered (July 2012), Bull (December 2012), Alstom (2013), Sanofi (2014).

Moreover, we have a specific portfolio construction tool to screen companies that pass our exclusion and selection criteria and thus are eligible to our SRI funds.

(B) Implementation: Thematic

LEI 09

Mandatory

Descriptive

PRI 1

LEI 09.1

Indicate the type of sustainability thematic funds or mandates that your organisation manages.

- Environmentally themed funds
- Socially themed funds
- Combination of themes

LEI 09.2

Describe your organisation's processes for sustainability themed funds. [Optional]

Please find below the processes of Sycomore AM's sustainability themed funds:

Sycomore Eco Solutions

We concentrate on businesses and sectors that interact strongly with the environment and analyse the environmental impact of each company's products and services. Therefore, Sycomore Eco Solutions focuses on five key areas: mobility and transport, the circular economy, renovation and construction, energy production and management, and ecosystem-related businesses. Our proprietary methodology relies on an environmental quantification process that measures, for each business, the extent to which companies align with the energy and environmental transition. We only invest in companies that have more than 10% of their revenues that actively contribute to this transition.

Also, the fund systematically steers clear of businesses that destroy natural capital. The investment approach is based on strong exclusion criteria (coal, intensive farming, minimum ESG rating...) and on a strategic stock selection process.

Sycomore AM also set up a strategic environment committee of experts with academic, institutional, corporate and NGO backgrounds. This committee is a venue for members to exchange critical and constructive views on complex environmental issues.

Sycomore Happy@Work

Sycomore Happy@Work was launched in 2015. It aims to invest in companies that recognise employee engagement and well-being as a key performance driver (several studies indicate that well-being at work reduces absenteeism, work accidents, turnover and drives creativity, engagement, sales and productivity).

We have identified five key pillars that enable employee happiness and engagement, at an individual level: equity, autonomy, sense of purpose and meaning, evolution and development and a good working environment.

A full assessment includes:

- an analysis of how companies perform on the five pillars and how it is organised to manage human capital,
- an assessment of other ESG metrics, since a minimum ESG score is required for a company to be eligible to the fund.

It is based on:

- public documents and meetings with operational management (Human Resources teams for example) where we seek both quantitative and qualitative information,
- on-site visits and employees' interviews when possible for small companies when representative and relevant,
- interviews of experts and ex-employees,
- anonymous testimonies on specialized websites,
- controversies assessments related to human capital management.

(C) Implementation: Integration of ESG issues

LEI 10	Mandatory	Core Assessed	PRI 1
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LEI 10.1 Indicate if E, S and G issues are reviewed while researching companies and/or sectors in active strategies.

ESG issues	Coverage/extent of review on these issues	
Environmental	Environmental	<div style="background-color: #0070c0; color: white; padding: 2px;">Environmental</div> <ul style="list-style-type: none"> <input checked="" type="radio"/> We systematically review the potential significance of environmental issues and investigate them accordingly <input type="radio"/> We occasionally review the potential significance of environmental issues and investigate them accordingly <input type="radio"/> We do not review environmental issues
Social	Social	<div style="background-color: #0070c0; color: white; padding: 2px;">Social</div> <ul style="list-style-type: none"> <input checked="" type="radio"/> We systematically review the potential significance of social issues and investigate them accordingly <input type="radio"/> We occasionally review the potential significance of social issues and investigate them accordingly <input type="radio"/> We do not review social issues
Corporate Governance	Corporate Governance	<div style="background-color: #0070c0; color: white; padding: 2px;">Corporate Governance</div> <ul style="list-style-type: none"> <input checked="" type="radio"/> We systematically review the potential significance of corporate governance issues and investigate them accordingly <input type="radio"/> We occasionally review the potential significance of corporate governance issues and investigate them accordingly <input type="radio"/> We do not review corporate governance issues

LEI 10.2 Additional information. [Optional]

Sycomore AM has developed a proprietary ESG methodology that allows us to store information, analyse, screen, score and monitor companies from an ESG standpoint. The ESG analysis and scoring tool is composed of 100 criteria. 100% of Sycomore AM's investment universe, that is approximately 700 companies, has been screened and the database is updated daily. The ESG team is mainly responsible for inputting ESG data in the database but the 11 other mainstream fund managers also input ESG information in the database and use relevant ESG information.

LEI 11	Voluntary	Additional Assessed	PRI 1
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LEI 11.1

Indicate which processes your organisation uses to ensure that ESG integration is based on a robust analysis.

- Comprehensive ESG research is undertaken or sourced to determine companies' activities and products
- Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- Company information and/or ratings on ESG are updated regularly
- A periodic review of the quality of the research undertaken or provided is carried out
- Structured, regular ESG specific meetings between responsible investment staff and the fund manager or within the investments team
- ESG risk profile of a portfolio against benchmark
- Other, specify
- None of the above

LEI 11.2

Describe how ESG information is held and used by your portfolio managers.

- ESG information is held within centralised databases or tools and it is accessible by all relevant staff
- ESG information or analysis is a standard section or aspect of all company research notes or industry/sector analysis generated by investment staff
- Systematic records are kept that capture how ESG information and research was incorporated into investment decisions
- Other, specify
- None of the above

LEI 11.3

Additional information.

Please see previous information provided on Sycomore AM's internal database where all financial and extra-financial information are disclosed.

LEI 12**Mandatory to Report Voluntary to Disclose****Core Assessed****PRI 1**

LEI 12.1

Indicate into which aspects of investment analysis you integrate ESG information.

- (Macro) economic analysis
- Industry analysis
 - Systematically
 - Occasionally
- Analysis of operational management
 - Systematically
 - Occasionally
- Analysis of company strategy
 - Systematically
 - Occasionally
- Portfolio construction
 - Systematically
 - Occasionally

LEI 12.2a

Indicate which methods are part of your process to integrate ESG information into fair value/fundamental analysis and/or portfolio construction.

- Adjustments to income forecasts (sales, earnings, cash flows)
- Adjustments to valuation tools (discount rates, return forecasts, growth rates)
- Other adjustments to fair value projections, specify

LEI 12.3

Describe how you integrate ESG information into portfolio construction

Sycomore AM integrates ESG criteria across all its investments, according to the following 3-step approach:

1. Each company's beta is automatically adjusted in our valuation model according to the stock's ESG and fundamental analysis. It can be adjusted from -20% to +20% depending on the risks and opportunities we identify in our analysis.
2. If a company has a poor ESG and fundamental analysis score, we will require a higher margin of safety.
3. ESG and fundamental analysis has a direct impact on portfolio construction as it adjusts the target weight of each stock in the portfolio.

For our SRI funds, a specific portfolio construction tool allows us to screen companies in our initial investment universe that respect all our exclusion and selection criteria.

LEI 12.4a

Describe the methods you have used to adjust the income forecast / valuation tool

As described above, each company's beta is automatically adjusted in our valuation model according to the stock's ESG and fundamental analysis. It can be adjusted from -20% to +20% depending on the risks and opportunities we identify in our analysis.

- Fair value/fundamental analysis
 - Systematically
 - Occasionally

LEI 12.2b | Indicate which methods are part of your process to integrate ESG information into fair value/fundamental analysis and/or portfolio construction.

- Adjustments to income forecasts (sales, earnings, cash flows)
- Adjustments to valuation tools (discount rates, return forecasts, growth rates)
- Other adjustments to fair value projections, specify

LEI 12.4b | Describe the methods you have used to adjust the income forecast / valuation tool

As described above, each company's beta is automatically adjusted in our valuation model according to the stock's ESG and fundamental analysis. It can be adjusted from -20% to +20% depending on the risks and opportunities we identify in our analysis.

Other, specify

Outputs and outcomes

LEI 14	Voluntary	Descriptive	PRI 1
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LEI 14.1 | Indicate how your ESG incorporation strategies have influenced the composition of your portfolio(s) or investment universe.

Screening

Describe any reduction in your starting investment universe or other effects.

Sycomore AM's SRI approach reduces investment universes quite significantly.

For Sycomore Selection Responsible, the main SRI equity fund, applying all screening criteria (both positive and negative) reduces the initial investment universe by over 60%.

Specify the percentage reduction (+/- 5%)

%

60

Thematic

Describe any alteration to your investment universe or other effects.

Applying thematic filters to obtain the investment universe of Sycomore Eco Solutions, one of the two Sycomore AM thematic funds, reduces the initial European universe by 75%.

Integration of ESG issues

Select which of these effects followed your ESG integration:

- Reduce or prioritise the investment universe
- Overweight/underweight at sector level
- Overweight/underweight at stock level
- Buy/sell decisions
- Other, specify
- None of the above

LEI 14.2

Additional information.

- Overweight/underweight at stock level:

Our internal financial analysis model is based on a "fundamental risk score" to determine a company's risk premium. This "fundamental risk score" ranges from C to A+ depending on whether a company creates value and respects its key stakeholders. 5 sub-scores are calculated. One for the company's interaction with Suppliers, Society and States (S); the second for its People (P); the third for Investors (I), which includes corporate governance; the fourth for its Clients (C); and the fifth for the Environment (E). We thus refer this "fundamental risk score" as the SPICE score of a company. This SPICE score, ranging from C to A+, has a direct impact on a company's risk premium and thus on a company's target price. This applies to the entire investment universe.

- Reduce or prioritize the investment universe:

Integrating ESG puts the spotlight on ESG risks and opportunities. As a result, the investment universe for SRI funds is reduced (companies that are too risky are excluded and we aim to favour companies that are part of the solution for a more sustainable future).

- Buy/sell decisions:

Specifically for our SRI funds, there is a permanent controversies watch. Every day, the ESG team inputs daily news and controversies into our internal model. Controversies are rated from 1 to 3 out of 3 according to their severity. When there is a severe controversy or when the newsflow is negative, fund managers have to make an active decision whether to keep or divest the company. For SRI funds, a level 3 controversy leads to immediate divestment. When the level of controversy for a company is considered too high, the ESG team can blacklist the company for all fund managers regardless of whether they manage an SRI fund or not.

LEI 15

Voluntary

Additional Assessed

PRI 1

LEI 15.1

Indicate whether your organisation measures how your approach to ESG issues in listed equity investments has affected financial and/or ESG performance.

- We measure whether our approach to ESG issues impacts funds' reputation
- We measure whether our approach to ESG issues impacts funds' financial performance: return

b) Funds' financial performance: return

Describe the impact on:	Describe the impact	Which strategies were analysed?
Funds' financial performance: return	<input checked="" type="radio"/> Positive <input type="radio"/> Negative <input type="radio"/> No impact	<input checked="" type="checkbox"/> Screening <input checked="" type="checkbox"/> Integration <input type="checkbox"/> Thematic

- We measure whether our approach to ESG issues impacts funds' financial performance: risk

c) Funds' financial performance: risk

Describe the impact on:	Describe the impact	Which strategies were analysed?
Funds' financial performance: risk	<input checked="" type="radio"/> Positive <input type="radio"/> Negative <input type="radio"/> No impact	<input checked="" type="checkbox"/> Screening <input checked="" type="checkbox"/> Integration <input type="checkbox"/> Thematic

- We measure whether our approach to ESG issues impacts funds' ESG performance
- None of the above

LEI 15.2

Describe how you are able to determine these outcomes.

Every year we backtest our ESG criteria to assess the level of correlation between these ratings and financial performance indicators of companies (stock performance and volatility, margins, ROCE...).

LEI 16

Voluntary

Descriptive

PRI 1

LEI 16.1

Provide examples of ESG issues that affected your investment view and/or performance during the reporting year.

- ESG issue 1

ESG issue and explanation
In 2015, we realised that a French food company had a surge in its absenteeism rate, which went over 7%. The ESG team discussed the issue with the CFO better to understand the underlying issue. The company was very forthcoming in explaining the difficulties it was facing on a particular production site which had led to the hike in the absenteeism rate.
ESG incorporation strategy applied
<input checked="" type="checkbox"/> Screening <input type="checkbox"/> Thematic <input type="checkbox"/> Integration <input type="checkbox"/> Combination of ESG incorporation strategies
Impact on investment decision or performance
The fund managers of Sycomore Happy@Work decided to sell the stock preventively until the social climate improved.

- ESG issue 2

ESG issue and explanation
In August 2015, Volkswagen admitted the real-world-driving NOx emissions of its US fleet were higher than reported.
ESG incorporation strategy applied
<input type="checkbox"/> Screening <input type="checkbox"/> Thematic <input checked="" type="checkbox"/> Integration <input type="checkbox"/> Combination of ESG incorporation strategies
Impact on investment decision or performance
The company was not held in SRI equity funds however it was in other funds which the ESG team alerted to the reputation and the litigation risk. As a result, those funds sold their stake rapidly thus preventing larger losses.

- ESG issue 3
- ESG issue 4
- ESG issue 5

Communication

LEI 17	Mandatory	Core Assessed	PRI 2,6
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LEI 17.1	Indicate if your organisation proactively discloses information on your approach to ESG incorporation in listed equity.
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We disclose it publicly

	Provide URL
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<http://www.sycomore-am.com/en/institutionnels/Our-expertise/ESG-SRI-Integration>

	Provide URL
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<http://www.sycomore-am.com/en/institutionnels/Our-offer/Reporting>

LEI 17.2	Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.
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Yes

LEI 17.3

Indicate the information your organisation proactively discloses to clients/ beneficiaries and the public regarding your approach to ESG incorporation.

- Broad approach to ESG incorporation
- Detailed explanation of ESG incorporation strategy used

LEI 17.4

Indicate how frequently you typically report this information.

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad-hoc/when requested
- No
- We disclose it to clients and/or beneficiaries only
- We do not proactively disclose it to the public and/or clients/beneficiaries

LEI 17.7

Additional information. [Optional]

- Since March 2012, all monthly fund reports integrate a specific ESG section.
- Since January 2015, we integrate in our reporting the carbon footprint of our funds.
- Since January 2015, we publish three or four times a year an SRI newsletter.
- Twice a year, we update our "code de transparence AGF/FIR". This report gives specific details on our integration methodology for ESG issues in our funds.

Sycomore Asset Management

Reported Information

Public version

Direct - Listed Equity Active Ownership

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

Engagement

Overview

LEA 01	Mandatory	Core Assessed	PRI 2
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LEA 01.1 Indicate whether your organisation has a formal engagement policy.

Yes

LEA 01.2 Indicate what your engagement policy covers:

- Conflicts of interest
- Prioritisation of engagements
- Transparency
- Environmental factors
- Social factors
- Governance factors
- Other, describe
- None of the above

LEA 01.4 Provide a brief overview of your organization's approach to engagement

Sycomore AM is convinced that engaging with the companies it invests in is mutually beneficial as it will create value for the company and its stakeholders. While in an engagement meeting investors share ESG best practice and help make the business case for sustainability, companies hear different views on the sustainability rationale for their business. A successful engagement outcome is when both parties feel empowered with a clear sustainability roadmap and key milestones for a more sustainable future.

Sycomore AM will:

- Engage with companies in its portfolios better to understand their ESG risks and opportunities;
- Encourage companies to publish their ESG strategies, policies and performances;
- Encourage companies to be as transparent as possible following particularly poor performances or a controversy, and to take corrective actions without delay;
- Vote at general meetings of all companies it holds, ask questions, oppose or support shareholder resolutions as necessary;
- Sell a stock in case there is no ESG improvement for companies held in SRI funds.

However, Sycomore AM will not:

- Try to get involved in defining the company strategy or in the day-to-day running of the business;
- Ask for a seat on the board.

No

LEA 02	Mandatory	Gateway	PRI 1,2,3
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LEA 02.1

Indicate your reasons for interacting with companies on ESG issues and indicate who carries these interactions out.

Type of engagement	Reason for interaction
Individual/Internal staff engagements	<input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> Other, specify <input type="checkbox"/> We do not engage via internal staff
Collaborative engagements	<input type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> We do not engage via collaborative engagements
Service provider engagements	<input type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> We do not engage via service providers

Process

Process for engagements run internally

LEA 03

Mandatory

Core Assessed

PRI 2

LEA 03.1

Indicate whether your organisation has a formal process for identifying and prioritising engagement activities carried out by internal staff.

- Yes
- No

LEA 03.3

Additional information. [Optional]

We decide whether to engage on a case-by-case basis.

LEA 04

Mandatory

Core Assessed

PRI 2

LEA 04.1

Indicate if you define specific objectives for your engagement activities.

- Yes
- No

LEA 04.2 Indicate if you monitor the actions that companies take following your engagements.

- Yes
 - Yes, in all cases
 - Yes, in the majority of cases
 - Yes, in the minority of cases
- No

LEA 04.3 Indicate whether your organisation defines milestones and goals for engagement activities carried out by internal staff.

- Yes
- No

General processes for all three groups of engagers

LEA 09	Voluntary	Additional Assessed	PRI 1,2
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LEA 09.1 Indicate if insights gained from your engagements are shared with your internal or external investment managers as input for consideration in investment decisions.

Type of engagement	Insights shared
Individual/Internal staff engagements	<input checked="" type="radio"/> Yes, systematically <input type="radio"/> Yes, occasionally <input type="radio"/> No

LEA 09.2 Additional information. [Optional]

All engagement information is shared internally through our proprietary tool SYCOVALO. All insights gained from various initiatives and engagement meetings are recorded in the database. Investment managers who consider this information useful for their investments are encouraged to use them. Also, the ESG team is fully integrated to the investment team so there is a continuous dialogue on ESG issues between ESG specialists and fund managers.

LEA 10	Mandatory	Gateway	PRI 2
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LEA 10.1 Indicate if you track the number of engagements your organisation participates in.

Type of engagement	Tracking engagements
Individual / Internal staff engagements	<input checked="" type="radio"/> Yes, we track the number of our engagements in full <input type="radio"/> Yes, we partially track the number of our engagements <input type="radio"/> We do not track

LEA 10.2 Additional information. [OPTIONAL]

We keep a record of all engagement meetings and engagement asks in our internal database SYCOVALO.

Outputs and outcomes

LEA 11

Mandatory to Report Voluntary to Disclose

Core Assessed

PRI 2

LEA 11.1

Indicate the number of companies with which your organisation engaged during the reporting year.

	Number of companies engaged (avoid double counting, see explanatory notes)	Proportion (to the nearest 5%)	Specify the basis on which this percentage is calculated
Individual / Internal staff engagements	<div style="border: 1px solid black; padding: 2px;">Number of companies engaged</div> <p>20</p>	<div style="border: 1px solid black; padding: 2px;">Proportion (to the nearest 5%)</div> <p>5</p>	<div style="border: 1px solid black; padding: 2px;">Specify the basis on which this percentage is calculated</div> <p> <input checked="" type="radio"/> of the total number of companies you hold <input type="radio"/> of the total value of your listed equity holdings </p>

LEA 11.2

Indicate the proportion of engagements that involved multiple, substantive and detailed discussions or interactions with a company during the reporting year relating to ESG issue.

Type of engagement	% Comprehensive engagements
Individual / Internal staff engagements	<input checked="" type="radio"/> > 50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> None

LEA 12

Voluntary

Additional Assessed

PRI 2

LEA 12.1 Indicate if your engagement involved:

- Letters to outline the engagement and the objectives
 - In some cases
 - In majority cases
 - In all cases
- Meetings and/or calls with the appropriate team
 - In some cases
 - In majority cases
 - In all cases
- Visits to operations
 - In some cases
 - In majority cases
 - In all cases
- Roadshows
- ESG research
 - In some cases
 - In majority cases
 - In all cases
- Other, specify

LEA 13 Voluntary Additional Assessed PRI 2

LEA 13.1 Indicate if your engagements in the reporting year covered E, S and/or G issues.

Type of engagement	Coverage
Individual / Internal staff engagements	<input checked="" type="checkbox"/> Environmental <input checked="" type="checkbox"/> Social <input checked="" type="checkbox"/> Corporate Governance <input type="checkbox"/> We do not track this information

LEA 13.2 Provide an estimated breakdown by E, S and/or G issues.

Individual / Internal staff engagements

% Overlapping ESG issues

100

100%

LEA 14 Voluntary Descriptive PRI 2

LEA 14.1 Indicate whether you have a reliable estimate of the number of cases during the reporting year where a company changed its practices, or made a formal commitment to do so, following your organisation's and/or your service provider's engagement activities.

- Yes
- No

LEA 14.3 Additional information [Optional].

The engagement approach of Sycomore AM was formalized too recently for any notable changes to have occurred. This is something we will track over the coming years.

LEA 15	Voluntary	Descriptive	PRI 2
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LEA 15.1 Provide examples of the engagements that your organisation carried out during the reporting year.

Add Example 1

Topic or ESG issue	Engaged French issuer Elixor on 2016 AGM consultation. Key ESG issues included alignment of interests and board composition.
Conducted by	<input checked="" type="checkbox"/> Individual / Internal
Objectives	Executive compensation: we asked the company to provide additional information regarding the qualitative criteria of the CEO's annual compensation. Employee engagement and satisfaction: we encouraged the company to identify the tools it could use to improve or maintain commitment and engagement among employees. Board composition: we suggested to the company that adding nutrition and agricultural competencies at board level might be pertinent.
Scope and Process	All suggestions were made by phone to the Director of IR and the Legal Counsel who directly pass the information on to the Board of Directors. We sent a written email summarising the key points raised during our conversation to our correspondents. We will assess Elixor's progress and disclosure on these points over the coming years.
Outcomes	We initiated this engagement process in February 2016. Therefore, no concrete outcome is expected before 2017.

Add Example 2

Topic or ESG issue	Met with the President of the Nomination and Compensation Committee of Spanish company Applus to discuss board composition, compensation, business ethics and CSR aspects.
Conducted by	<input checked="" type="checkbox"/> Individual / Internal
Objectives	<p>CSR: we suggested to the company to initiate a CSR policy and to publish a sustainability report.</p> <p>Board composition: we suggested to the company to hire more diversified profiles and to reflect on the role of the Strategic Committee after the departure of Carlyle.</p> <p>Business ethics: we encouraged the company to train business partners and employees on business ethics.</p>
Scope and Process	All suggestions were made during a face-to-face meeting with the President of Nomination and Compensation Committee. Next meeting will be organized next year. The suggestions concern the whole company since it is related to governance issues. We will assess Applus' progress and disclosure on these points over the coming years.
Outcomes	We initiated this engagement process in January 2016. Therefore, no concrete outcome is expected before 2017.

Add Example 3

Topic or ESG issue	Met Klepierre's Sustainable Development Research Manager and the IR. Topics of engagement included transparency & communication and responsible purchasing.
Conducted by	<input checked="" type="checkbox"/> Individual / Internal
Objectives	Transparency& communication: we asked the company to communicate the results of the 2016 employee engagement survey in its next sustainability report. We also expect the company to communicate more about the environmental practices of subcontractors. Responsible purchasing: we will review progress regarding responsible purchasing and more precisely regarding the planned implementation of the Ecovadis platform.
Scope and Process	All suggestions were made by email to the Sustainable Development Research Manager and the IR after our meeting.
Outcomes	We initiated this engagement process in March 2016. Therefore, no concrete outcome is expected before 2017.

- Add Example 4
- Add Example 5
- Add Example 6
- Add Example 7
- Add Example 8
- Add Example 9
- Add Example 10

Communication

LEA 16

Mandatory

Core Assessed

PRI 2,6

LEA 16.1

Indicate whether your organisation proactively discloses information on its engagements.

- We disclose it publicly
- We disclose it to clients and/or beneficiaries only

LEA 16.5

Indicate what engagement information your organisation proactively discloses to clients/beneficiaries.

Engagement information disclosed

- Details of the selections, priorities and specific goals of engagement
- Number of engagements
- Breakdown of engagements by type/topic
- Breakdown of engagements by region
- An assessment of the current status of the engagement
- Outcomes that have been achieved from the engagement
- Other information

LEA 16.6

Indicate how frequently you typically report engagements information

- Disclosed continuously (prior to and post engagements)
 - Disclosed quarterly or more frequently
 - Disclosed biannually
 - Disclosed annually
 - Disclosed less frequently than annually
 - Ad hoc/when requested
- We do not proactively disclose it to the public and/or clients/beneficiaries.

(Proxy) voting and shareholder resolutions

Overview

LEA 17

Mandatory

Gateway

PRI 1,2,3

LEA 17.1

Indicate whether your organisation has a formal voting policy.

- Yes

LEA 17.2

Indicate what your voting policy covers:

- Conflicts of interest
- Prioritisation of voting activities
- Transparency
- Decision making processes
- Environmental factors
- Social factors
- Governance factors
- Securities lending process
- Other, describe
- None of the above

LEA 17.3	Please attach or provide a URL to your voting policy. [Optional]
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URL

<http://www.sycomore-am.com/files/reglement/PDV-2015-SAM.pdf>

LEA 17.4	Provide a brief overview of your organization's approach to (proxy) voting (including the filing and/or co-filing of shareholder resolutions if applicable).
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Since 2011, Sycomore AM has developed and implements a voting policy. Since 2015, we systematically vote for all companies in our portfolios. All votes are carefully analysed by the governance team (the ESG team + one person who works in the middle office) and cast using the services of ISS (<http://www.issgovernance.com/>).

No

Process

LEA 18	Mandatory	Descriptive	PRI 2
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LEA 18.1	Indicate how you typically make your (proxy) voting decisions and what this approach is based on.
-----------------	---

Approach

- We use our own research or voting team and make our own voting decisions without the use of service providers.
- We hire service provider(s) that make voting recommendations or provide research that we use to inform our voting decisions.

Based primarily on

- the service provider voting policy signed off by us
- our own voting policy
- our clients' requests or policy
- other, explain
- We hire service provider(s) that make voting decisions on our behalf, except for some pre-defined scenarios for which we review and make voting decisions.
- We hire service provider(s) that make voting decisions on our behalf.

LEA 18.2	Additional information.[Optional]
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Since 2015, Sycomore AM has worked with ISS, a proxy voting advisory company. Prior to that, Sycomore AM used to work with Proxinvest.

Sycomore AM has defined its own voting policy according to which ISS makes voting recommendations. Sycomore AM's governance team (the ESG team + one person who works in the middle office) reviews ISS research and voting recommendations to help them make their voting decisions but ultimately Sycomore AM always votes according to its own voting policy.

LEA 20	Voluntary	Descriptive	PRI 2
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LEA 20.1 To ensure that your (proxy) votes are cast and reach their intended destination on time, indicate if you do the following.

- Obtain end-to-end confirmation that votes have been lodged
- Participate in projects to improve the voting trail and/or to obtain vote confirmation
- None of the above

LEA 21	Voluntary	Additional Assessed	PRI 2
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LEA 21.1 Indicate if your organisation has a securities lending programme.

- Yes
- No

LEA 21.3 Please explain the rationale behind not having a securities lending programme

Most of Sycomore AM's funds are "equity savings account" (plans d'épargne en actions in French), which means that they have to hold a minimum of 75% equities at all times. Sycomore AM decided several years' ago to stop lending securities.

LEA 22	Mandatory	Core Assessed	PRI 2
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LEA 22.1 Indicate if you ensure that companies are informed of the rationale when you and/or the service providers acting on your behalf abstain or vote against management recommendations.

- Yes, in most cases
- Sometimes, in the following cases:
 - votes in selected markets
 - votes on certain issues (all markets)
 - votes for significant shareholdings (all markets)
 - Votes for companies we are engaging with
 - other, explain
- No
- Not applicable as we and/or our service providers do not abstain or vote against management recommendations

LEA 22.2 Additional information. [Optional]

We track the reason why we abstain or we vote against management recommendations for all votes cast within the ISS platform.

For significant shareholdings, we advise management and/or board members why we have voted against or abstained.

We also do so when we are engaging with the company around the AGM.

We do not systematically inform companies why we have voted against management or abstained but we have the ability to do so if the company asks for additional information.

Outputs and outcomes

LEA 23	Mandatory	Core Assessed	PRI 2
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LEA 23.1 For listed equities where you and/or your service provider have the mandate to issue (proxy) voting instructions, indicate the percentage of votes cast during the reporting year.

- We do track or collect this information

Votes cast (to the nearest 1%)

%

80

Specify the basis on which this percentage is calculated

- of the total number of ballot items on which you could have issued instructions
- of the total number of company meetings at which you could have voted
- of the total value of your listed equity holdings on which you could have voted

LEA 23.2 If there are specific reasons why you did not vote certain holdings, explain these, and if possible, indicate the percentage of holdings affected by these factors. [Optional]

2015 was the first year Sycomore AM had decided to vote outside of France. Several POAs had not been set up which led to several vote rejections. We are currently working to rectify this.

- We do not track or collect this information

LEA 24	Voluntary	Descriptive	PRI 2
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LEA 24.1 Indicate if you track the voting instructions that you and/or your third party have issued on your behalf.

- Yes, we track this information
- No, we do not track this information

LEA 25	Voluntary	Descriptive	PRI 2
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LEA 25.1 Indicate if your organisation directly or via a service provider filed or co-filed any shareholder resolutions during the reporting year.

- Yes
- No

Communication

LEA 27	Mandatory	Core Assessed	PRI 2,6
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LEA 27.1 | Indicate if your organisation proactively discloses information on your voting activities.

- We disclose it publicly

provide URL

<http://www.sycomore-am.com/fr/institutionnels/Informations-reglementaires>

provide URL

http://www.sycomore-am.com/files/reglement/Rapport_Vote_2015.pdf

LEA 27.2 | Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.

- Yes

LEA 27.3 | Indicate the voting information your organisation proactively discloses to the public and/or to clients/beneficiaries.

Indicate how much of your voting record you disclose

- All voting decisions
- Some voting decisions
- Only abstentions and opposing vote decisions
- Summary of votes only

Indicate what level of explanation you provide

- Explain all voting decisions
- Explain some voting decisions
- Only explain abstentions and votes against management
- No explanations provided

LEA 27.4

Indicate how frequently you typically report voting information.

- Continuously (primarily before meetings)
- Continuously (soon after votes are cast)
- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad-hoc/as requested

- No
- We disclose it to clients/beneficiaries only
- We do not proactively disclose our voting activities to the public and/or to clients/beneficiaries

LEA 27.8

Additional information. [Optional]

If our clients want more information and details regarding Sycomore AM's votes at specific AGMs, we disclose them.

Sycomore Asset Management

Reported Information

Public version

Direct - Fixed Income

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

Overview

FI 01	Mandatory to Report Voluntary to Disclose	Gateway	General
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FI 01.1 Provide a breakdown of your internally managed fixed income securities by active and passive strategies

Corporate (non-financial)	Passive	0
	Active - quantitative (quant)	0
	Active - fundamental and active - other	100
	Total	100%

FI 03	Mandatory to Report Voluntary to Disclose	Descriptive	General
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FI 03.2 Indicate the approximate (+/- 5%) breakdown of your corporate and securitised investments between investment grade or high-yield securities.

Corporate (non-financial)	High-yield	75
	Investment grade	25
	Total	100%

FI 03.3 Additional information. [Optional]

Sycamore AM's credit investment universe consists of corporate bonds without rating constraints (IG, High Yield and unrated) or size constraints.

ESG incorporation in actively managed fixed income

Implementation processes

FI 04	Mandatory	Gateway	PRI 1
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FI 04.1	Indicate 1) Which ESG incorporation strategy and/or combination of strategies you apply to your actively managed fixed income investments; and 2) The proportion (+/- 5%) of your total actively managed fixed income investments each strategy applies to.
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Corporate (non-financial)	Screening alone	0
	Thematic alone	0
	Integration alone	40
	Screening + integration strategies	60
	Thematic + integration strategies	0
	Screening + thematic strategies	0
	All three strategies combined	0
	No incorporation strategies applied	0
	100%	

FI 04.2 Describe your primary reasons for choosing a particular ESG incorporation strategy and how combinations of strategies are used.

Sycomore Selection Credit (SSC) is Sycomore AM's only corporate-bond SRI-labelled fund. As at 31/12/2015, it was 156 M€ AUM, that is 60% of all managed corporate bonds. SSC's SRI approach consists in filtering the universe to exclude companies that are too risky on 6 key criteria:

1. Environmental risk (upcoming regulations, potential fines, litigation provisions, etc.)
2. Quality of social climate (known social conflicts, abnormally high rates of turnover or absenteeism, etc.)
3. Reputation risk (controversies, activities in highly-sensitive areas or businesses, etc.)
4. Financial communication risk (results vs guidance history, openness and availability to meet with investors, etc.)
5. Accounting risk (independence of auditors, complicated and obscure accounting, etc.)
6. Bondholder risk (aggressive leverage or share buyback, debt financing of dividend, etc.)

An issuer that obtains a rating below 2 out of 5 on one of these criteria (or on the overall ESG score), will be excluded from the investable universe. This approach screens out over 30% of the initial universe.

FI 05 **Mandatory to Report Voluntary to Disclose** **Core Assessed** **PRI 1**

FI 05.1 Indicate which ESG factors you systematically research as part of your ESG analysis on issuers.

Select all that apply

			Corporate (non-financial)	
Environmental data			<input checked="" type="checkbox"/>	
Social data			<input checked="" type="checkbox"/>	
Governance data			<input checked="" type="checkbox"/>	

FI 05.2 Indicate what format your ESG information comes in and where you typically source it

Raw ESG company data

Indicate who provides this information

- ESG research provider
- Sell-side
- In-house – specialised ESG analyst or team
- In-house – FI analyst, PM or risk team
- Other, specify
- ESG factor specific analysis

Indicate who provides this information

- ESG research provider
 - Sell-side
 - In-house – specialised ESG analyst or team
 - In-house – FI analyst, PM or risk team
 - Other, specify
- Issuer-level ESG analysis

Indicate who provides this information

- ESG research provider
 - Sell-side
 - In-house – specialised ESG analyst or team
 - In-house – FI analyst, PM or risk team
 - Other, specify
- Sector-level ESG analysis

Indicate who provides this information

- ESG research provider
 - Sell-side
 - In-house – specialised ESG analyst or team
 - In-house – FI analyst, PM or risk team
 - Other, specify
- Country-level ESG analysis

Indicate who provides this information

- ESG research provider
- Sell-side
- In-house – specialised ESG analyst or team
- In-house – FI analyst, PM or risk team
- Other, specify

FI 05.3 Provide a brief description of the ESG information used, highlighting any differences of sources of information across your ESG incorporation strategies.

We collect data first and foremost through company annual and sustainability reports. We also use third-party information that help us hone our analysis of companies (publications from brokers, calls with various experts, NGO publications, newspapers, social networks, etc.).

FI 06	Mandatory	Additional Assessed	PRI 1
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FI 06.1 Indicate how you ensure that your ESG research process is robust:

- Issuers are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- Issuer information and/or ESG ratings are updated regularly to ensure ESG research is accurate
- Internal audits of ESG research are undertaken in a systematic way
- ESG analysis is benchmarked for quality against other providers
- Other, specify
- None of the above

FI 06.2 Describe how your ESG information or analysis is shared among your investment team.

- ESG information is held within a centralised database and is accessible to all investment staff
- ESG information is a standard item on all individual issuer summaries, 'tear sheets', 'dashboards' or similar documents
- Investment staff are required to discuss ESG information on issuers as a standard item during investment committee meetings
- Records capture how ESG information and research was incorporated into investment decisions
- Other, specify
- None of the above

(A) Implementation: Screening

FI 07 **Mandatory** **Gateway** **PRI 1**

FI 07.1 Indicate the type of screening you conduct.

Select all that apply

			Corporate (non-financial)	
Negative/exclusionary screening			<input checked="" type="checkbox"/>	
Positive/best-in-class screening			<input type="checkbox"/>	
Norms-based screening			<input checked="" type="checkbox"/>	

FI 07.2 Describe the type of screening you apply to your internally managed active fixed income

Sycomore Selection Credit (SSC) is Sycomore AM's corporate-bond SRI-labelled fund. As at 31/12/2015, it was 156 M€ AUM. SSC excludes companies that are too risky on 6 key criteria:

1. Environmental risk (upcoming regulations, potential fines, litigation provisions, etc.)
2. Quality of social climate (known social conflicts, abnormally high rates of turnover or absenteeism, etc.)
3. Reputation risk (controversies, activities in highly-sensitive areas or businesses, etc.)

4. Financial communication risk (results vs guidance history, openness and availability to meet with investors, etc.)
5. Accounting risk (independence of auditors, complicated and obscure accounting, etc.)
6. Bondholder risk (aggressive leverage or share buyback, debt financing of dividend, etc.)

The remaining assets invested in corporate bonds integrate ESG criteria but are not SRI-labelled.

Finally, the following exclusion policies apply:

1. Exclusion of all controversial weapons for all investments

In line with the Oslo and Ottawa conventions, Sycomore AM excludes any investment in controversial weapons.

2. Exclusion policy for SRI funds

For SRI funds, it does not invest in companies that produce weapons or weapon systems, nuclear power, GMOs and tobacco, and that derive more than 5% of their revenue from these activities.

FI 08	Mandatory	Descriptive	PRI 1
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Corporate (non-financial)

Corporate (non-fin)

- For legal reasons
- For non-legal reasons

FI 08.2	Describe your approach to ESG-based negative screening of certain issuers from your investable universe.
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Sycomore Selection Credit (SSC) excludes companies that are too risky on 6 key ESG criteria:

1. Environmental risk (upcoming regulations, potential fines, litigation provisions, etc.)
2. Quality of social climate (known social conflicts, abnormally high rates of turnover or absenteeism, etc.)
3. Reputation risk (controversies, activities in highly-sensitive areas or businesses, etc.)
4. Financial communication risk (results vs guidance history, openness and availability to meet with investors, etc.)
5. Accounting risk (independence of auditors, complicated and obscure accounting, etc.)
6. Bondholder risk (aggressive leverage or share buyback, debt financing of dividend, etc.)

An issuer that obtains a rating below 2 out of 5 on one of these criteria (or on the overall ESG score), will be excluded from the investable universe. This approach screens out over 30% of the initial universe.

FI 09	Voluntary	Additional Assessed	PRI 1
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FI 09.1	Provide examples of how ESG factors are included in your screening criteria.
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- Example 1

Type of fixed income
<input checked="" type="checkbox"/> Corporate (non-financial)
ESG factors
<input checked="" type="checkbox"/> Environmental <input type="checkbox"/> Social <input type="checkbox"/> Governance
Screening
<input checked="" type="checkbox"/> Negative/ exclusionary <input type="checkbox"/> Norms-based
Description of how ESG factors are used as the screening criteria
<p>As part of our environmental risk criteria, we look at upcoming regulations, potential fines, litigation provisions that were made (or not) and whether those are sufficient. Insufficient provisioning can be extremely damaging for companies and in specific cases even lead to bankruptcy.</p>

Example 2

Type of fixed income
<input checked="" type="checkbox"/> Corporate (non-financial)
ESG factors
<input type="checkbox"/> Environmental
<input type="checkbox"/> Social
<input checked="" type="checkbox"/> Governance
Screening
<input checked="" type="checkbox"/> Negative/ exclusionary
<input type="checkbox"/> Norms-based
Description of how ESG factors are used as the screening criteria
<p>There are numerous examples showing that accounting risks, if they materialize, can be extremely damaging for a company. As part of our analysis, we look at whether there have been instances of fraud or accounting irregularities in the past (and if so how they have been handled by the company and whether management in charge at the time is still in place), how independent auditors are (fees paid for audit and non-audit missions, length of working relationship with the company) and how complicated accounting practices are (recurring exceptional items, complex consolidation of revenues).</p>

- Example 3
- Example 4
- Example 5

FI 10	Mandatory	Core Assessed	PRI 1
FI 10.1	Indicate which systems your organisation has to ensure that fund screening criteria are not breached in fixed income investments.		

Type of screening	Checks
Negative/exclusionary screening	<p>Negative/exclusionary screening</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Checks are performed to ensure that issuers meet screening criteria <input checked="" type="checkbox"/> Data used for the screening criteria is updated at least every 2 years <input type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input checked="" type="checkbox"/> Audits of fund holdings are undertaken regularly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above
Norms-based screening	<p>Norms-based screening</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Checks are performed to ensure that issuers meet screening criteria <input checked="" type="checkbox"/> Data used for the screening criteria is updated at least every 2 years <input type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input type="checkbox"/> Audits of fund holdings are undertaken regularly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above

(C) Implementation: Integration

FI 14	Mandatory	Descriptive	PRI 1
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FI 14.1	Describe your approach to integrating ESG into traditional financial analysis.
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Sycomore AM has developed a proprietary ESG methodology that allows us to store information, analyse, screen, score and monitor companies from an ESG standpoint. The ESG analysis and scoring tool is composed of 100 criteria. 100% of Sycomore AM's investment universe, that is approximately 700 companies, has been screened and the database is updated daily. The ESG team is mainly responsible for inputting ESG data in the database but the 11 other mainstream fund managers also input ESG information in the database and use relevant ESG information.

Sycomore Selection Credit, the SRI corporate bond fund, applies 6 negative screening criteria to exclude companies whose risks are too high.

Corporate (non-financial)

Sycomore AM's ESG approach is applicable to investment grade, high yield and unrated bond issuers alike.

FI 15	Mandatory	Core Assessed	PRI 1
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FI 15.1 Indicate how ESG information is typically used as part of your investment process.

Select all that apply

			Corporate (non-financial)
ESG analysis is integrated into fundamental analysis			<input checked="" type="checkbox"/>
ESG analysis is integrated into security weighting decisions			<input checked="" type="checkbox"/>
ESG analysis is integrated into portfolio construction decisions			<input checked="" type="checkbox"/>
ESG analysis is a standard part of internal credit ratings or assessment			<input checked="" type="checkbox"/>
ESG analysis for issuers is a standard agenda item at investment committee meetings			<input checked="" type="checkbox"/>
ESG analysis is regularly featured in internal research notes or similar			<input checked="" type="checkbox"/>
ESG analysis is a standard feature of ongoing portfolio monitoring			<input checked="" type="checkbox"/>
ESG analysis features in all internal issuer summaries or similar documents			<input checked="" type="checkbox"/>
Other, specify			<input type="checkbox"/>

FI 16 **Mandatory** **Additional Assessed** **PRI 1**

FI 16.1 Indicate the extent to which ESG issues are reviewed in your integration process.

	Environment	Social	Governance
Corporate (non-financial)	Corporate (non-financial)	<div style="background-color: #0070C0; color: white; padding: 2px; text-align: center;">Environmental</div> <input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all	<div style="background-color: #0070C0; color: white; padding: 2px; text-align: center;">Social</div> <input checked="" type="radio"/> Systematically <input type="radio"/> Occasionally <input type="radio"/> Not at all

Corporate (non-financial)

Sycomore AM has developed a proprietary ESG methodology that allows us to store information, analyse, screen, score and monitor companies from an ESG standpoint. The ESG analysis and scoring tool is composed of 100 criteria. 100% of Sycomore AM's investment universe, that is approximately 700 companies, has been screened and the database is updated daily. The ESG team is mainly responsible for inputting ESG data in the database but the 11 other mainstream fund managers also input ESG information in the database and use relevant ESG information.

All investment professionals share the same investment tool named SYCOVALO. In that regard, every investment professional is responsible for the ESG analysis of companies he or she covers. This ensures an on-going quality review by professionals whose analysis is directly impacted by ESG criteria and analysis. The Head of Sustainable & Responsible Investment approves all ESG scores.

Fixed income - Engagement

FI 18

Mandatory to Report Voluntary to Disclose

Core Assessed

PRI 2

FI 18.1

Indicate if you engage on your fixed income assets. Please exclude any engagements carried out solely in your capacity as a shareholder.

Category	Proportion of assets
Corporate (non-financial)	<input type="radio"/> >50% <input type="radio"/> 26-50% <input type="radio"/> 5-25% <input type="radio"/> More than 0%, less than 5% <input checked="" type="radio"/> We do not engage

Outputs and outcomes

FI 21

Mandatory to Report Voluntary to Disclose

Additional Assessed

General

FI 21.1

Indicate whether your organisation measures how your incorporation of ESG analysis in fixed income has affected investment outcomes and/or ESG performance.

Select all that apply

			Corporate (non-financial)
We measure whether incorporating ESG impacts funds' reputation			<input type="checkbox"/>
We measure whether incorporating ESG impacts financial returns			<input checked="" type="checkbox"/>
We measure whether incorporating ESG impacts risk			<input checked="" type="checkbox"/>
We measure whether incorporating ESG impacts funds' ESG performance			<input checked="" type="checkbox"/>
None of the above			<input type="checkbox"/>

FI 21.2

Describe how your organisation measures how your incorporation of ESG analysis in fixed income has affected investment outcomes and/or ESG performance. [OPTIONAL]

Every year we backtest our ESG criteria to assess the level of correlation between these ratings and financial performance indicators of companies (stock performance and volatility, margins, ROCE...).

Communication

FI 23

Mandatory

Core Assessed

PRI 2,6

FI 23.1

Indicate if your organisation proactively discloses information on your approach to RI across all of your fixed income investments.

- We disclose it publicly

Provide URL

http://www.sycomore-am.com/files/shared_documents/SYCOMORE%20-%20Fonds%20SSC%20-%20Code%20de%20transparence%20AGFFIR%20-%202030.06.2015_EN.pdf

FI 23.2

Indicate if the information disclosed to the public is the same as that disclosed to clients/beneficiaries.

- Yes

FI 23.3

Indicate the information your organisation proactively discloses to the public regarding your approach to RI incorporation.

- Broad approach to RI incorporation
- Detailed explanation of RI incorporation strategy used

FI 23.4

Indicate how frequently you typically report this information.

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad-hoc/when requested
- No
- We disclose it to clients and/or beneficiaries only
- We do not proactively disclose it to the public and/or clients/beneficiaries