

2021

Certified



Corporation

sycoway as a company

mission-driven company report



sycamore
am

foreword



“We invest to develop an economy that is more sustainable and inclusive and to generate positive impacts for all of our stakeholders. Our mission: make investment more human.”

Our mission embodies how we view our role as investors: to take a long-term perspective and work hand in hand with the companies we own as one of their stakeholders - alongside their employees, clients, suppliers, and society. Hence the need for us to take a close look at our own practices and behaviour with our stakeholders, and act responsibly with each and every one of them. Our goal is to set an example for our clients and for the companies in which we invest: we have to be exemplary if we are to guarantee the consistency and credibility of the standards, we ourselves, expect of our portfolio companies. This report is the latest in our series of CSR reports published since 2011 and marks an important landmark, as the first publication after a full-year for us as a purpose-driven company.

2021 was also the year of our 20th anniversary: 20 years of commitment and continuous progress to better serve our clients; 20 years spent developing an approach increasingly aware of our own responsibility, both as a company and as an investor. After our change in status in 2020 from an ordinary to a purpose-driven company, our Sustainable Development Committee became a Mission Committee and adjustments were made to internal stakeholders. We continued to deploy our range of thematic SRI funds with the launch of Sycomore Inclusive Jobs and Sycomore Global Education, focusing on two societal priorities - access to decent employment and education, and Sycomore Global Éco Solutions and Sycomore Happy@Work, with a more international outlook.

Having pledged to develop Responsible Investment practices and taken part in the work conducted by the Forum for Responsible Investing and FranceInvest on impact finance in 2020, we participated in the marketplace initiative led by Finance for Tomorrow on the theme of Impact. We continued our R&D work on biodiversity and climate impact measurement within our portfolios. We enhanced our climate roadmap and submitted our targets for increasing the net environmental contribution of our investments and their alignment with a +2°C temperature trajectory to the Science Based Targets initiative. We also supported the adjustment of working conditions in a context that remained challenging on the health front and worked on developing sustainable working methods. We continued to invest in our own human capital and now employ 74 people at the end of 2021.

Writing this report as purpose-driven company has prompted us to offer even more transparency and implement exemplary practices. The report provides details on our various initiatives and enables readers to follow our progress; it also includes the Mission Committee’s conclusions on the achievement of our objectives. The report complements our [Responsible Investor Report](#). We welcome any feedback and wish you a very pleasant read!

Emeric Préaubert
CEO

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1.1 to bring a human dimension to **investment**

Founded in 2001, Sycomore Asset Management is an entrepreneurial asset management company specialised in responsible investing. Driven by our commitment to combine purpose and performance, our teams' objective is to deliver sustainable performances by identifying the levers that create long-term value.

To be viable for future generations, an economy is dependent upon resources offered by healthy ecosystems—fresh water, clean air, robust biodiversity, productive land—and on the stability of fair societies. The financial industry can contribute to achieving the United Nations' 2030 agenda - the global framework for building a more sustainable and inclusive economy: according to the United Nations' Conference on trade and development, a further \$5-7 trillion per year are needed to achieve the Sustainable Development Goals set in the 2030 agenda⁽¹⁾.

In this context, we believe that the financial sector has a key role to play in developing an economy able to address major environmental, social, and societal issues: it is our responsibility to ensure our investment decisions serve a more sustainable and inclusive economy and to encourage companies as they transform to meet these challenges.

 our **mission**

As an engaged player and in keeping with our approach as a responsible investor, we have chosen the following wording for our mission:

“We invest to develop an economy that is more sustainable and inclusive and to generate positive impacts for all of our stakeholders. Our mission: make investment more human.”

This mission embodies how we view our role as asset managers: taking a long-term approach, working close with companies as one of their stakeholders, close to their staff, their clients, suppliers, society, and the environment in its broadest sense.

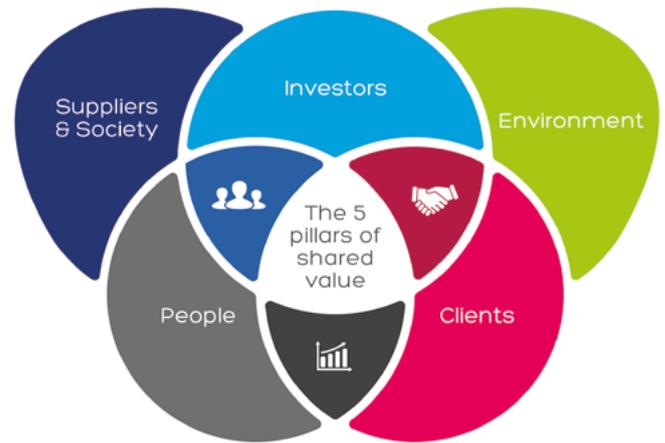
To help us achieve our mission, we have set six social and environmental objectives impacting all our stakeholders, which will formally determine our priorities:

- 01** **to measure and improve** the **environmental and societal contribution** of our investments while providing transparency and a learning experience for our clients.
- 02** **to continue** with the development of **our socially responsible fund range**, aiming to deliver positive impacts combining purpose and performance.
- 03** **to offer** our employees a **quality working environment** and involve them in strategic decisions, while preserving our entrepreneurial spirit through employee share ownership.
- 04** **to strengthen** our own **societal contribution** by sharing some of the value we create with charities, notably via the Fondation Sycomore.
- 05** **to deploy** our **responsible procurement policy** and contribute towards creating resilient ecosystems.
- 06** **to create** **sustainable value** for our shareholders.

(1) World Investment Report

The six objectives that make up our mission are designed to account for the impacts on all our stakeholders, in keeping with our SPICE fundamental analysis model.

Developed in-house and used to assess the companies of our investment universe, the SPICE model analyses the strength of their business model and examines their social, societal, and environmental impacts. We are convinced that a company can only create long-term value if this value is shared with all its stakeholders; as such, our SPICE analysis is structured around the company's interaction with the latter: S for Society & Suppliers, P for People, I for Investors, C for Clients, E for Environment.



The key issues associated with each of our stakeholders can be summarised as follows:

society

Our main lever for contributing positively to society is through our investment strategies. Our assessment of a company's net societal contribution covers the following dimensions: access and inclusion, health and safety, economic and human advancement, and employment. Our societal contribution also involves spending some of the value we create through the Fondation Sycomore and sharing the management fees generated by our thematic funds to support charities.

suppliers

Our different activities also involve many partners operating within the financial ecosystem – financial and extra-financial research, trading, brokerage, custodian banks – as well as service partners – reception, audit and consultancy services, cleaning, supplies etc. We have implemented equitable and transparent selection procedures and developed trust-based relations with our partners. We also apply our responsible procurement policy, which selects - where possible - partners displaying a responsible corporate approach.

people

We firmly believe that fulfilment at work is an essential factor for fostering employee engagement and thereby ensuring the successful achievement of the corporate project; we make sure our staff are offered a quality working environment and are attentive to their needs and requests. We conduct regular engagement surveys and take actions based on their outcome. Employee stock ownership is also a key tool in ensuring staff feel truly involved with the success of the company.

investors

Our approach to investing stems from our conviction that a company can only create sustainable value if this value is shared among all of its stakeholders. As a result, the commitments we make to our stakeholders contribute to creating sustainable value for our shareholders. Our business model is founded on our unique approach as a responsible investor, which our shareholders are also keen to encourage. Our commitment is to ensure that our strategic priorities continue to support and strengthen this approach.

clients

Since the creation of Sycomore AM, our commitment has been to offer financial returns as well as investments with a purpose. We report on the financial and "sustainable development" performances of our investments on D+1 at the end of each month. In addition to developing metrics aimed at assessing the societal and environmental contributions of our investments, we have committed to obtaining the government-backed SRI label for our entire "Long Only" equity fund range. Our focus today is to develop projects involving socially responsible investment products and generating positive impacts.

environment

Our impact on the environment is primarily produced by our investments. Our priority is to contribute, through our investments, to the environmental and climate-driven transition. As described in our Natural Capital strategy, our approach when assessing the contribution of a company's business model to this transition is based on physical impacts - positive and negative - throughout the entire lifecycle; we naturally examine impacts on the climate, but also on biodiversity, resources/waste, water and air quality. To this end, we have created a specific scientific metric, the NEC – for Net Environmental Contribution, which offers full transparency and is supported by the NEC Initiative's group collaboration on www.nec-initiative.org. We are committed to supporting the NEC Initiative, monitoring the NEC within our funds, and improving Sycomore AM's own NEC as a company.

01

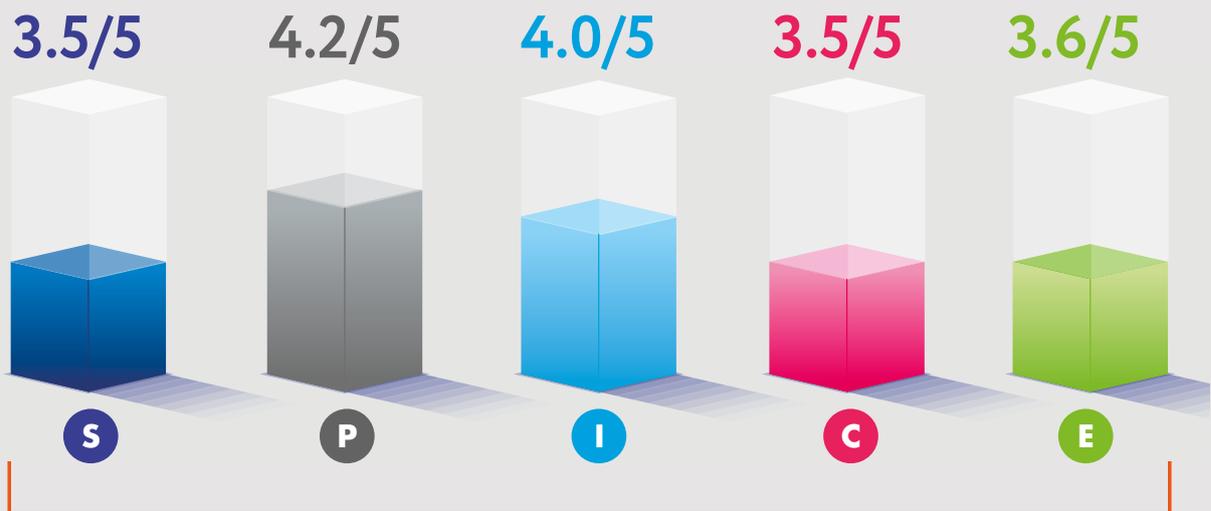
our mission

1.2 our achievements

● spice rating

In order to monitor our progress and identify possible areas for improvement, we calculate our SPICE rating every two years.

At end 2020, Sycomore AM's SPICE rating was 3.9/5, including the following scores per pillar:



S P I C E RATING
3.9/5

This rating, which is much higher than the average of 3/5, reflects a robust business model, strong performances on human capital issues, and the deployment of a range of SRI strategies designed to contribute positively to societal and environmental challenges through the firm's investments. This assessment will be updated in 2022 for our 2023 report.

our barometer

The barometer below illustrates the links between our stakeholders and the six priorities set in our mission; it also records the progress made with regards to the annual objectives listed in the previous report and provides details on our goals for 2022. The barometer also presents the key performance indicators that will enable us to monitor progress towards achieving our statutory objectives.

STATUTORY OBJECTIVES

To measure and improve the environmental and societal contribution of our investments, while providing clear information and a learning experience for our clients.



To continue with the development of our socially responsible fund range, aiming to deliver positive impacts combining purpose and performance.



To offer our employees a quality working environment and involve them in strategic decisions, while preserving our entrepreneurial spirit through employee share ownership



2021 version of our statutory objectives	Status as assessed by the Mission Committee	Key Progress Indicators on the achievement of statutory objectives
Publish the societal contribution of our investments	✔ Objective achieved	
Steer the NEC as a performance indicator for some of our SRI funds	✔ Objective achieved	2021 NEC +10%, stable compared to 2020
Deploy our Human Rights policy across our investments in 2023	✔ Objectif achieved, work was conducted in 2021 and will be continued into 2022 and 2023	Societal contribution in 2021 +30% (first publication)
Se up at reporting on the exposure of our investments to the UN's Sustainable Development Goals, an external and readable framework for our clients	✔ Objective achieved	
Examine and test CBF biodiversity footprint measurements by end 2023 before learning from the experience and determining the next steps.	✔ Objectif achieved, work was conducted in 2021 and will be continued into 2022 and 2023	
Continue with the development of our SRI fund range	✔ Objective achieved	87% of SRI AUM: +9% compared to 2020 and +51% compared to 2016
Deploy our Human Rights policy – on the company side by end 2022	✔ Objectif achieved, work was conducted in 2021 and will be continued into 2022 and 2023	
Encourage employee share ownership	✔ Objective achieved	90% of employees would recommend Sycomore AM (to friends or family members) as a «great place to work» (GreatPlaceToWork 2020 survey, conducted every two years)
Review our working methods	✔ Objective achieved	
Improve the on-boarding of non-French speaking employees	✔ Objective achieved	
Foster a positive corporate culture over the long-term that serves our employees' well-being	✔ Objectif achieved, work was conducted in 2021 and will be continued into 2022 and 2023	16% of the capital is owned by employees at end 2021, stable compared to 2020
Conduct an employee engagement survey	✔ Objective achieved	

✔ Achieved ! In progress ✘ Not achieved

our barometer

STATUTORY OBJECTIVES

To strengthen our own societal contribution by sharing some of the value we create with charities, notably via the Fondation Sycomore

S

To deploy our responsible procurement policy and contribute towards creating resilient ecosystems

S E

To create sustainable value for our shareholders

I

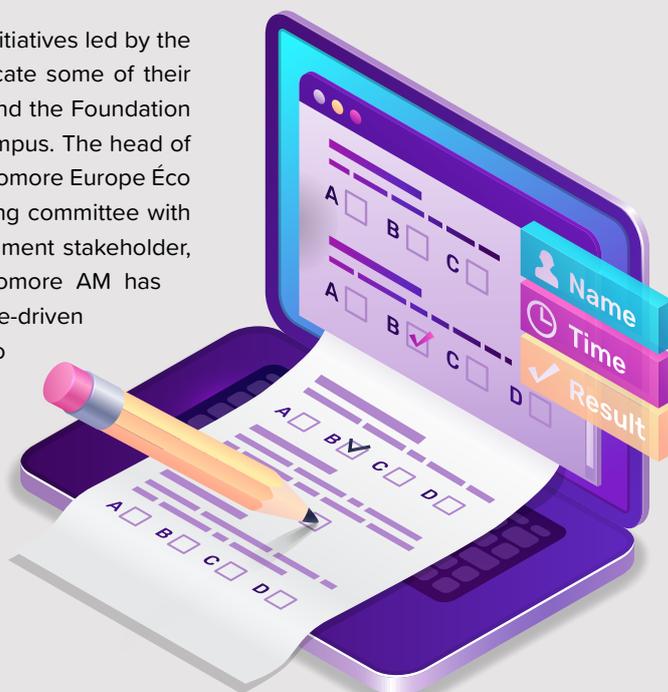
2021 version of our statutory objectives	Status as assessed by the Mission Committee	Key Progress Indicators on the achievement of statutory objectives
Raise the impact of our thematic funds by donating some of the management fees to charities	✔ Objective achieved	2 funds now redistribute some of their management fees to charities (vs 1 in 2020)
Continue the external deployment of the NEC, with the development of the NEC SAS	✔ Objective achieved	
Take part in industry-wide think tanks on Impact	✔ Objective achieved	
Strengthen employee involvement with the Fondation	✔ Objective achieved	
Active deployment of the responsible procurement policy	⚠ Some of the bids featured CSR criteria aligned with the responsible procurement policy. However, further details are needed on the mid-term goals of this statutory objective.	Inclusion of CSR criteria in two RFP bids in 2021
Ensure that internal and external stakeholders are represented within the mission committee	⚠ The Committee's members, modus operandi and reporting have changed. Further work is to be conducted to ensure external stakeholders are represented within the committee.	
Leverage the BCorp status of the company to serve our continuous improvement	✔ Objective achieved	Renewal of internal Mission Committee members
Account for wage equity between men and women and between employees	⚠ Objective achieved, however attention is drawn to the decline reported in the gender equality index.	Gender equality index: 78/100 in 2021 vs 82/100 in 2020
Formally include CSR/SRI targets in employee compensation plans	⚠ Some factors have been incorporated into individual road maps. However more details will be required on the extra-financial targets applicable to different teams, particularly to the investment teams.	Wage gap capped at 25 times the median salary

✔ Achieved ⚠ In progress ✘ Not achieved

statutory objectives: the mission committee's **conclusions** on the road to progress in 2021

Efforts deployed in 2021 and the results achieved on indicators shown in the above barometer are a testimony to Sycomore AM's continued drive to improve its practices, with a view to achieving its mission:

- The Net Environmental Contribution (NEC) of Sycomore AM's investments is assessed on a scale of -100% to +100% over several years and compared with the NEC of European indices – which is close to 0 and serves as the average global NEC reference. Though stable at end 2021 compared to end 2020 (at +10%), the company's NEC has increased substantially since its last calculation at end 2018 (+4%). The Societal Contribution of products and services offered by portfolio companies was published for the first time at the end of 2021 and came in largely positive at +29%⁽²⁾ on a scale ranging from -100% to +100% and above the contribution of European indices, at +26%⁽³⁾. Finally, Sycomore AM has set up biodiversity and climate-related quantitative targets to be achieved by 2030.
- The range of SRI-certified funds has grown considerably over the past few years, reaching 87% at end 2021. This development is aligned with the company's search for positive impacts within existing SRI funds, and from 2021, with the launch of two new funds focusing on education and decent work.
- Sycomore AM ensured it continued to offer a quality working environment for its employees by applying the government's recommendations in response to the health situation and working on the definition of new working methods. Offering employees access to the capital is a priority that also fosters Sycomore AM's entrepreneurial culture, a principle that is reflected in the percentage of capital owned by employees (excluding founding partners) which stands at 13.3%. The decision was also offer access to employee share ownership to a larger number of individuals.
- Sycomore AM continued to support charities by funding the initiatives led by the Fondation Sycomore and encouraging all employees to allocate some of their working hours to the Foundation's activities. Sycomore AM and the Foundation have partnered up with Hectar, the world's largest farming campus. The head of the environment strategy and the team responsible for the Sycomore Europe Éco Solutions fund issued several recommendations to the steering committee with a view to sharing some of the value created with the Environment stakeholder, through charities and initiatives, at fund or firm level. Sycomore AM has invested € 1.5 M in the creation of the NEC initiative, a purpose-driven company that now includes 4 shareholders and is dedicated to the development and dissemination of a premium industry standard that is international, open, and science-based.
- To monitor the efforts deployed in achieving the company's mission, the Sustainable Development Committee became a Mission Committee which was restructured following a call for in-house memberships. The committee took an active part in the proposal and monitoring of initiatives aimed at achieving the statutory objectives.



(2) Calculated on the basis of the invested percentage of funds, with a coverage ratio of 91% (weight), excluding funds of funds, representing 91% of Sycomore AM's assets under management as of December 31st 2021.

(3) STOXX 600 and MSCI Europe; calculated based on a coverage ratio (weight) of 70% and 69% respectively, as of December 31st 2021.

statutory objectives: the mission committee's **conclusions** on the road to progress in 2021

Other actions were either initiated or were unable to be achieved. The Mission Committee also identified the following priorities for years to come:

- Mission Committee to be widened to include external stakeholders (qualified and independent members)
- Definition of detailed pluriannual targets to support the achievement of statutory objectives in years to come, including for instance a target for the gender wage gap
- Systematic implementation of the responsible procurement policy
- Implement levers that will ensure an improvement in portfolio NECs - which remained stable in 2021
- Integration of Sycomore AM's SPICE and B Corp ratings to support the assessment of the firm's performance for its shareholders.

More details are provided in the following sections on initiatives achieved in 2021 and potential lines for action.

In addition to the progress made towards achieving our statutory objectives, other initiatives were deployed in 2021 to support our plans for continuous improvement:

TARGETS SET IN 2020 FOR 2021

Conduct a client satisfaction survey and publish the main conclusions

Anticipate any regulatory change impacting responsible finance

Strengthen our in-house whistle blowing mechanism

Improve the way we communicate on the firm's tax policy

Promote frugal digital habits

Set up a long-term reporting on our carbon footprint

STATUS

 This initiative was postponed in the context of our brand overhaul and to give us more time to lay down the details of our client satisfaction monitoring strategy.

 Work was conducted in 2021 and will be continued into 2022.

 The ESC worked on the issue. The scheme may be strengthened as part of the deployment of our Human Rights policy - company section.

 Objective achieved

 A taskforce was set up in 2021 to address the issue.

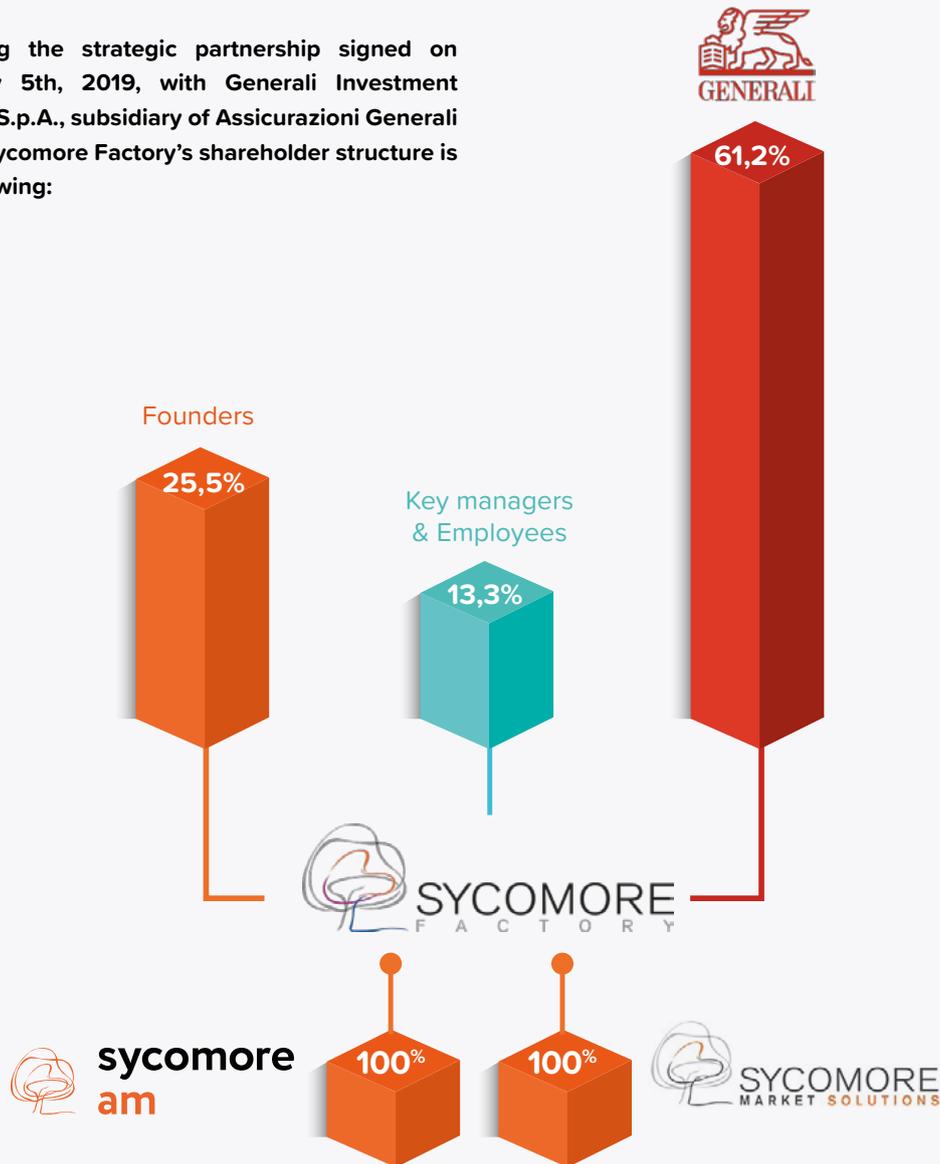
 Objective achieved

 Achieved  In progress  Not achieved



our **structure**

Following the strategic partnership signed on February 5th, 2019, with Generali Investment Holding S.p.A., subsidiary of Assicurazioni Generali S.p.A., Sycomore Factory's shareholder structure is the following:



Sycomore Factory owns 100% of Sycomore Asset Management and 100% of Sycomore Market Solutions (AMF registered brokerage firm).

Furthermore, Sycomore AM owns 43% of Revaia (formerly Gaia Capital Partners), a company dedicated to supporting the new generation of responsible entrepreneurs in the fields of technology and innovation in Europe. The firm also owns minority stakes (5%) in Lita.co, a Positive Impact Fintech, whose long-term ambitions are to become a responsible neo-bank.



2.2 sycomore factory's supervisory board

our **committees**

- Sycomore Factory's **Supervisory Board** is accountable for the smooth running of the operating entities under its ownership, namely Sycomore AM and Sycomore MS. The Board is informed of the strategic decisions made at firm level, monitors their implementation, and may issue recommendations.

The Board is entitled to assess and approve some of the most important decisions, covering a specific perimeter, which although have been taken at firm level, could have major repercussions for shareholders of Sycomore Factory, notably in terms of financial obligations or reputation (acquisition of stakes in a company, laying-off of the Chief Risk or Compliance Officer...)

The Board includes Christine Kolb, Emeric Préaubert, Cyril Charlot and Laurent Deltour, as well as seven members appointed by the Generali Group. It also includes two independent members. Women account for 23% of the Board.



4
meetings
per year

Director	Role	Appointment/mandate renewed
Carlo Angelo Trabattoni	Chairman of the Supervisory Board	Shareholder agreement - 05.02.2019 then appointed Chairman by the AGM on 10/05/2021
Emeric Préaubert	Member of the Board	Shareholders' agreement - 05.02.2019
Cyril Charlot	Member of the Board	Shareholders' agreement - 05.02.2019
Laurent Deltour	Member of the Board	Shareholders' agreement - 05.02.2019
Christine Kolb	Member of the Board	Shareholders' agreement - 05.02.2019
Tim Rainsford	Member of the Board	Shareholders' agreement - 10.05.2021
Fabio Cleva	Member of the Board	Appointed by the Supervisory Board 21.06.2021
Bruno Servant	Member of the Board	Shareholders' agreement - 05.02.2019
Hugues Aubry	Member of the Board	Shareholders' agreement - 05.02.2019
Santo Borsellino	Member of the Board	Appointed by the Supervisory Board 27.11.2019
Michele Patri	Member of the Board	Appointed by the Supervisory Board 12.05.2020
Cécile Paillard	Independent Member	Appointed by the Supervisory Board 21.09.2020
Elisabetta Caldirola	Independent Member	Appointed by the Supervisory Board 21.09.2020

Sycomore AM's executive management is structured around two governance bodies: the Board of Directors and the Executive Committee, with support from the Steering Committee,

2.3 sycomore AM's conseil board of directors

- **The Board of Directors** sets the overall strategic direction for the company, its budgets and investment policies. It also ensures that these policies are duly implemented. It carries out any audits and checks as deemed necessary. The Board also meets to close the company's accounts and to approve any changes made to the UCITS. It includes the five members shown in the table below:



4
meetings
per year

Director	Mandate	1 st Mandate	End of mandate
Emeric Préaubert	CEO and Managing Director	2020	2024
Cyril Charlot	Deputy Managing Director	2020	2026
Bruno Servant	Member of the Board	2020	2026
Michele Patri	Deputy Managing Director	2020	2026
Santo Borsellino	Member of the Board	2020	2026

2.4 sycomore AM's executive committee



Cyril Charlot
Deputy Managing
Director

Christine Kolb
Director, Strategy and
Business Development

Emeric Préaubert
Chief Executive
Officer

The Executive Committee, which includes the three founding partners, is in charge of the daily running of the company. Its members' complementary backgrounds facilitate the firm's team-based management and separation of duties - Cyril and Emeric run the Investment side, while Christine heads Strategy & Development - as well as the decision making-process.

The Executive Committee forms an integral part of the Steering Committee, which also includes five managers – representing Sycomore AM's main business units (CROS*, Human Capital, Sales, Investment). It meets once a week to approve key business development decisions and to facilitate internal communications.



1
meeting per
week

*CROS : Compliance, Risks, Operations & Systems

2.5 mission committee

The Mission Committee is the governance body responsible for monitoring the effective implementation of the mission. The committee - which includes members representing different business units at Sycomore AM - sets and monitors the firm's commitments and objectives. It reports to Sycomore AM's Steering Committee, which ensures the strategy is aligned with the corporate mission.

Initially referred to as the Sustainable Development Committee when it was created in 2018, the committee changed in 2021 when Sycomore AM took on the status of a purpose-driven company in 2020..

In-house members were renewed following a call for applications. Effective in March 2021, the Committee now includes the following members:

- Anne-Claire Imperiale, Head of ESG and Engagement within the Investment Team
- Christophe Hourtoulle, Institutional Business Development within the Sales Team
- Fatou Nicolas, Head of Corporate Services
- Francesca Mozzati, Product Specialist for Southern Europe within the Sales Team
- François Bonnel, Project Manager within the Marketing Team
- Giulia Culot, Portfolio Manager
- Hugo Mas, Portfolio Manager
- Jean-Guillaume Péladan, Head of Environmental Research
- Malik Bouziane, Deputy Head of the Middle Office
- Wilhelm Fevry-Luyckx, Deputy CFO

So far, the Committee has held 4 meetings. The Committee also took part in two Steering Committee meetings to discuss the action plan for 2021 and select the independent third-party that would be suggested to the Board of Directors (Le Cabinet de Saint Front consultancy firm was appointed by the Board on December 16th, 2021). The Mission Committee also published four reports sent to all employees, with information on the renewal of members, internal taskforces that were set up and a review of the work conducted throughout the year.

Four taskforces (TF) were set up in 2021 and will continue to run in 2022:

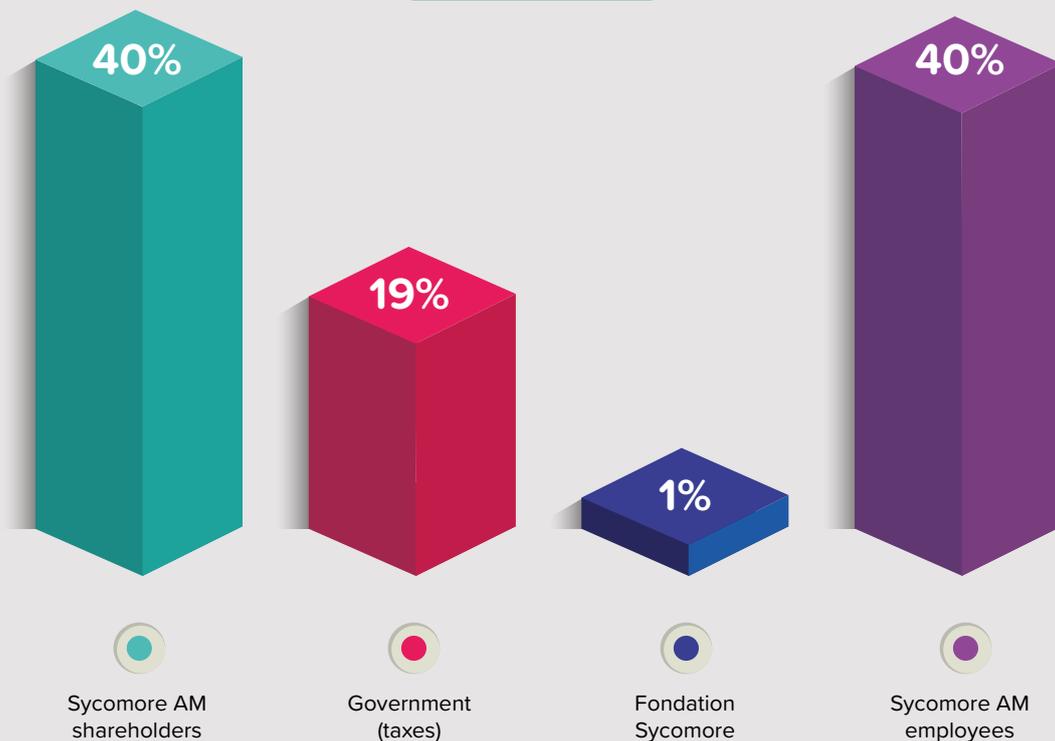
- Purpose-driven company reporting TF
- Digital Frugality TF
- Happy@Work TF
- Corporate Human Rights TF humains « Entreprise »

As is the case every year, the Mission Committee has drawn up and followed an action plan designed to help Sycomore AM achieve its statutory objectives. The Committee was responsible for assessing the company's carbon footprint in partnership with the I Care consultancy firm. It also gave life to our B Corp™ certification by taking an active part in the initiatives led by B Lab France and by working on identifying areas for improvement in relation to our B Corp™ certification. The Committee ran the bid process that led to the selection of the Cabinet de Saint Front as an independent third-party in charge of assessing our status as a purpose-driven company.

our **conviction**

We firmly believe a company can only create sustainable value if this value is shared with all its stakeholders. Driven by this conviction, Sycomore AM pays particular attention to the distribution of the value it creates with its stakeholders, both in terms of its own operations and through its investments. Around 40% of the value created by Sycomore AM is redistributed to employees in the form of wages and bonuses; around 19% goes to the government in taxes; close to 1% of the operating income is allocated to the Fondation Sycomore and the remainder, around 40%, is distributed to shareholders (all shareholder types, paid-out as dividends).

shared value



All of the income generated by Sycomore AM, from its French-domiciled “Fonds Communs de Placement” and from the Luxembourg SICAV, is subject to French Corporate Tax (CT).

In 2021, the average rate of CT (including the Social Contribution on Profits) applicable to Sycomore AM stood at 27.3% of taxable profits (28.9% in 2020). This drop in percentage is the result of the common corporate tax rate from 28% (in 2020) to 26.5% (applicable in 2021).

Finally, all of the Sycomore Factory companies (including Sycomore AM) pay their taxes exclusively in France.

● our **ethics**

The **Ethics Code** is a tangible expression of the company's commitments in this area and enables our teams to develop a holistic understanding of the rules of good conduct applicable to all. Sycomore AM's employees commit to performing their duties in compliance with the following four guiding principles:

- Act independently, with loyalty, confidentiality, proficiency, care, and diligence.
- Put the clients' interests first and ensure they are treated equally.
- Identify, prevent, and manage any risks of conflicts of interest in the best way possible.
- Manage portfolios with autonomy, independence, and transparency with regards to markets and clients, while also ensuring an acceptable separation of duties.

The Code also lists the rules applicable to personnel in terms of personal transactions, market trades, the use of IT tools and corporate communications. The Code is accessible to all staff members via intranet and is signed by all new members of personnel.



3.1 our commitment

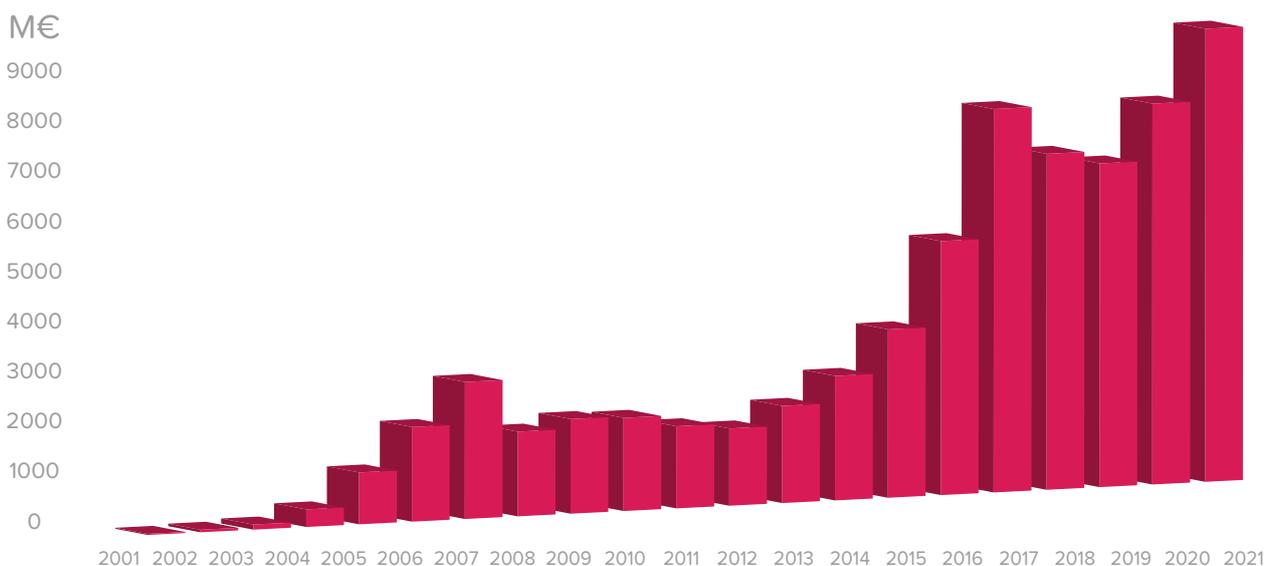
meeting the needs of all our clients
by delivering **quality** service

Business development at Sycomore AM is not limited to our “Sales force” but draws from the expertise of all our teams to deliver quality client service and build long-lasting growth. While human considerations guide our exchanges with clients, they also drive our teams in their daily work..

Sycomore AM's teams – investor relations, client service, marketing, investment, risk management and middle-office – share a common goal, which is to provide a quality service meeting our clients' toughest requirements and standard levels..

As of December 31st, 2021, Sycomore AM manages assets worth € 9.1 billion, of which 37% on behalf of international clients. We manage assets for various investor types, chiefly institutional investors, private banks, and family offices..

**Growth in assets under management
since the creation of Sycomore AM**

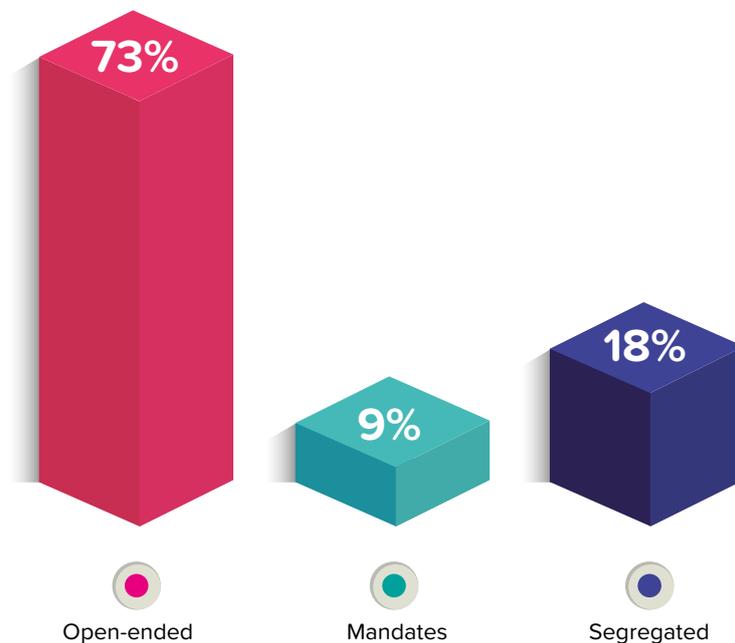


3.1 our commitment

Breakdown of assets under management by client type



Breakdown of assets under management by fund type



In our effort to lead by example in matters of transparency and client service, we provide our clients with:

- Monthly reports available on D+1 (working days) in French and English and on D+5 in Spanish, Italian and German.
- Detailed reports available between D+5 and D+8 (working days) including an SRI analysis.
- Portfolio inventories available upon request to meet regulatory and transparency requirements (Basel III, Solvency).
- Tailor-made dedicated reports, both financial and extra-financial.
- Annual responsible investor and impact reports for each fund.

3.2 our offer

● active managers seeking sustainable value

Designed to offer both purpose and performance, our investment expertise - which seeks to identify durable levers for growth - is split into four main strategies: Equities – SRI Multi-theme and Thematic – SRI Crossover Credit – and Flexible strategies. The certification of our funds is a testimony to our responsible investment approach: at end 2021, all our Long-Only equity funds, our credit strategy Sycomore Sélection Crédit and our wealth management fund Sycomore Next Generation received the SRI Label from the French Government having made the necessary adjustments to meet the new specifications published in 2020. The certifications received in other countries reflect our international business development dynamics: some have received the Towards Sustainability label in Belgium, the FNG label in Germany or the Umweltzeichen in Austria. Other labels reflect the specific characteristics of some of our funds, such as the Greenfin label for Sycomore Europe Éco Solutions or the “recovery” label for Sycomore Sélection PME.

Consistent with our mission, the teams have strengthened the range of impact-seeking funds, particularly on social and societal considerations, with the launch of two new SRI-certified strategies:

- **Sycomore Global Education**, launched in March 2021, is a global equity fund investing in companies that contribute to life-long education and training: i/ providers of educational products and services; ii/ enablers that create conditions conducive to learning; iii/ education sponsors that leverage education to create shared value with their stakeholders and make a positive contribution to society. From the fund’s launch and consistent with the search for positive impacts in the field of education, it committed to sharing some of the management fees with Hectar, the agricultural campus.
- **Sycomore Inclusive Jobs**, an SRI and Finansol-certified fund, launched on May 7th 2021, is an inclusive equity fund investing in companies that create sustainable and inclusive jobs according to Sycomore AM’s analysis. The fund invests 85% to 95% of its assets in European listed stocks meeting strict ESG selection criteria, and 5 to 10% in units of the FCPR Sycomore Impact Emploi By INCO. This FCPR fund, managed by INCO Ventures, invests primarily in unlisted Social Purpose Inclusive Companies (Esus) that create inclusive jobs for those with a difficult access to employment. The selection of listed companies relies on the The Good Jobs Rating methodology, which draws from three key dimensions to assess a company’s contribution to employment-related societal issues: quantity, quality, and geography. Furthermore, portfolio companies must operate in businesses aligned with the environmental and societal transitions.

Sycomore Global Education and Sycomore Inclusive Jobs are classified Article 9 under the SFDR “Sustainable Finance Disclosure Regulation” and are SRI-certified.

Sycomore AM also made changes to its Flexible investment strategies applicable to Sycomore L/S Opportunities and Sycomore Partners in order to strengthen the use of binding extra-financial criteria within the investment process. Both funds are Article 8 under the SFDR classification.

3.2 our offer

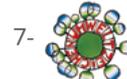
FUNDS	FOCUS	GEOGRAPHY	LABEL (S)	SFDR
SRI CREDIT Sycomore Sélection Crédit	Responsible selection of European bonds	Eurozone	1/6/7/8	Article 9
Multi-themed Sycomore Francecap Sycomore Sélection Responsable Sycomore Sélection Midcap Sycomore Sélection PME	Our main convictions in the French market Multi-themed selection of responsible companies Responsible selection of small and mid caps Our main convictions on SMEs and ETIs	France Eurozone Eurozone Eurozone	1 1/6/7/8 1 1/4	Article 9 SRI fund with an environmental and/or social objective
SOCIAL/SOCIETAL Sycomore Shared Growth Sycomore Happy@Work Sycomore Global Education Sycomore Inclusive Jobs	For a better life: selection of growth stocks with a positive societal impact Focus on Human Capital, recognised as the leading performance driver Companies supporting lifelong quality education Companies supporting the creation of durable and inclusive jobs	Zone Euro Eurozone, international diversification Global Eurozone	1/6/7/8 1/6/8 1/6 1/3/6	
ENVIRONMENT Sycomore Éco Solutions	Companies engaged in the transition ecological and energetic	Europe, international diversification	1/2/6/8	
RESPONSIBLE TECH Sycomore Sustainable Tech	Responsible companies in the technology sector	Global	1/5/6	
Thematics				
FLEXIBLE Sycomore Partners Sycomore Next Generation Sycomore Allocation Patrimoine Sycomore L/S Opportunities	Conviction-driven equity strategy with integrated ESG constraints) SRI flexible wealth management fund Flexible wealth management fund Flexible long/short management on equities	Europe Global Global Europe	1/6	

France

Belgium

Austria

Germany



our commitment

Our pledge to expand our responsible investment offering will continue in 2022, with:

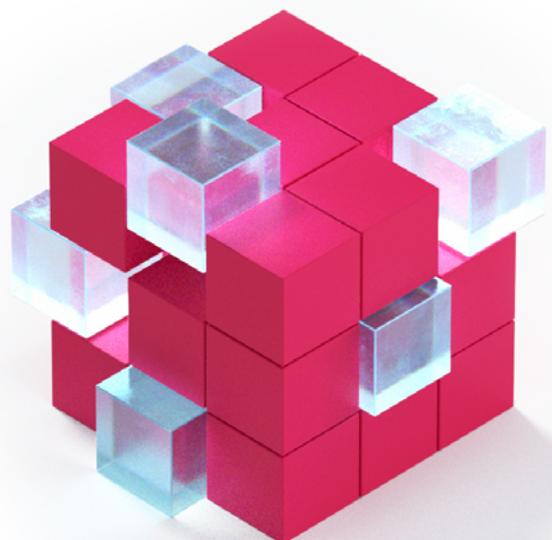
01 The launch of three new SRI equity and credit thematic funds:

- Environment Strategy with **Sycomore Global Éco Solutions**: global equity fund investing in companies that support the environmental and energy transitions, according to the Net Environmental Contribution (NEC) methodology (launched in December 2021).
- Social/Societal strategy with **Sycomore Global Happy@Work**: global equity fund that invests in companies that pay particular attention to human capital, recognised as their leading performance driver (launched in December 2021).
- Credit Strategy with **Sycomore NEC+ Corporate Bonds**: Investment Grade Eurozone bond fund investing in companies that support the environmental and energy transition according to the NEC methodology (at project stage).

02 Increased reliance on extra-financial criteria within the flexible allocation strategy:

Project for transforming Sycomore Allocation Patrimoine into a feeder fund of Sycomore Next Generation, an SRI-certified flexible fund. This decision was made as both funds share very similar investment strategies, though the future master fund Sycomore Next Generation goes one step further as it applies a certified Socially Responsible Investment approach.

Information on the ESG performance of our investments and on the pursuit of environmental, social, and societal impacts, will be published from June 30th in our [responsible investor report](#) in compliance with Article 29 of the Energy Climate Law.



3.3 recognised investment

a reflection of our **standards of excellence**

Awards acknowledging our ability to align our investment approach with our clients' interests

In 2021, our approach embedding Environmental, Social and Governance factors into the investment process received international recognition.

Trophée d'or 2021 Green Finance Awards

run by Decideurs
Magazine & Leaders League



ESG Champions 2021, run by
Mainstreet Partners



Grand Prix de la Philanthropie 2021, Asset Management Company – Insertion category, run by the FICADE group (Gestion de Fortune, Investissement Conseils, Profession CGP and Patrimoine24).



Top prize for Sycomore Inclusive Jobs (best inclusive fund) and 2nd prize in the ESG favorite category
run by H24 Finance



Insurance Asset Management

Finalist in the ESG Investment Strategy of the year category, run by Insurance Asset Management



Shortlisted for the ESG Investing Awards, run by ESG Investing



Top 10 achiever - Responsible Investment Brand Index (RIBI) 2021, run by Hirschel and Kramer

3.4 from physically close to digitally close

regular **interaction** with our stakeholders



The year ended on a high note as we celebrated our 20th anniversary. We organised a spectacular evening held at the Opéra Garnier in Paris with all our stakeholders. The theme of this memorable event, attended by over 1,000 guests, was Dance.



As was the case in 2020 and in a context marked by the continued pandemic and health measures restricting the organization of physically held events, we believed in maintaining regular and sustained interactions with all of our stakeholders and confirmed our ability to support our clients and meet their expectations.

Our annual conference was held as a digital seminar on the theme of **A Fair Transition** with guest speakers including Jacques Attali and other engaged company executives. This annual event was followed by over 430 people during the live broadcast and was viewed over 1,300 times with replays.

We also ran several webinars presenting our investment convictions and SRI thematics.

Through our active presence on social networks, we continued to communicate on responsible investing.

2021 saw a sharp increase in digital formats with 27 videos recorded in-house. Boosted by the pandemic crisis, client relations became increasingly digital, prompting us to produce qualitative and innovative content on a more frequent basis. In addition to the many webinars and RFP pitch presentations held on Zoom or Teams, we developed stock spotlights, capsules on promising ESG issues and market updates.

Meanwhile, our LinkedIn account recorded a 30% rise in the number of followers - with around 12,000 subscribers, notably boosted by the native video format which the algorithm is so fond of.



mission committee's **conclusion** on the achievement of statutory objective #2

Continue with the development of our socially responsible investment fund range aiming to deliver positive impacts combining purpose and performance

«To continue with the development of our socially responsible fund range, aiming to deliver positive impacts combining purpose and performance».

Sycomore AM was active in launching new strategies designed to generate positive impacts for the environment and for society, as reflected in the article 9 classification of 100% of the funds created in 2021. At present, 85% of the firm's assets under management are classified under article 9. Our teams also took an active part in industry-wide think tanks organized to share best ESG practices. This strong momentum consolidates our positioning as a leading and engaged player in the field of responsible finance.

Sycomore AM's teams are proud to have achieved their objective, which was to continue expanding the socially responsible fund range aimed at delivering positive impacts, combining purpose and performance. Enhancing these positive results with client feedback – which will be received via a satisfaction survey scheduled for 2022 – has been identified as a priority by the Mission Committee.



4.1 human capital, key driver of our success

our vision

“ In today’s world of data and algorithms, we value human capital. We are a group of women and men united around a common goal pursued in our different professions: creating sustainable value.

We are convinced that a company can only create sustainable value if this value is shared with all of its stakeholders.

Our purpose as an investor is to help create a more sustainable and inclusive economy and generate positive impacts for all our stakeholders.

Our mission: to bring a human dimension to investment.

Our ambition: to deliver performance through purposeful investments. ”

our values

To steer us in our daily business operations and fulfil our objectives, we focus on three key values chosen by Sycomore AM’s employees: audacity, cohesion, and engagement. To ensure these values come to life in our daily work, we have converted them into “principles for action”.

Audacity is about cultivating a spirit of open-mindedness and intellectual curiosity in order to break with industry standards and set ourselves apart. We encourage risk taking and accept failure.

“If you want to go fast, go alone. If you want to go far, go together.” Thanks to our group cohesion, we share the successes and learn from our failures together.

Our full and individual engagement acts as a common performance driver. This strong engagement means we can build the future together through our daily actions.

Amaury ELOY, **Head of Human Capital**

We believe goodwill is the key to a company’s vitality. When this goodwill is sincere (i.e. upheld by senior management who epitomise these values in their relations with others) and when it is assimilated and disseminated throughout the company, this mindset means team members are free to be truly themselves; it can open up their creativity, intelligence and initiative, without fear of petty or authoritarian management practices. Goodwill fosters trust, transparency, critical thinking, and constructive feedback. In essence, it prevents an organisation from becoming ‘fossilised’. It is a source of collective interest and personal fulfilment. Rethinking the way we work based on goodwill is a revitalising exercise for any Manager.



● notre vision

At end 2021, Sycomore (Sycomore Factory, Sycomore AM and Sycomore Market Solutions) employs 74 people, a figure up by 7% compared to 2020. The recruitment of new staff contributed to strengthening the investment and sales teams. These included:

Pôle Gestion

- Tony Lebon, Credit Analyst
- Olivier D'Incan, Tech Analyst
- Davy Martin, Investment Team Chief of Staff

Tony Lebon's arrival in the Credit team has strengthened our bond analysis capabilities in the context of the expansion of our range. The recruitment of Olivier D'Incan has consolidated the investment team dedicated to the Sycomore Sustainable Tech fund. Finally, Davy Martin's role is to coordinate the Investment Team to meet the expansion and growing international profile of our strategies.

Pôle Commercial

- Jérôme Paradis, Product Specialist, German-speaking Europe (Austria, Switzerland)
- Amaury Peltier, Relationship Manager, Institutional Investors
- Charles De Solages and Nicolas Pennel, Relationship Managers, Distribution Partners

With the arrival of Charles and Nicolas, Sycomore AM has confirmed its ambitions and its positioning as a close partner with its distributor clients. In the same vein, Jérôme Paradis has strengthened the firm's international development and Amaury Peltier's arrival has consolidated the expertise of our Institutional Sales team.

Pôle Général

- Wilhelm FEVRY-LUYCKX, Deputy CFO, to strengthen the Finance team.

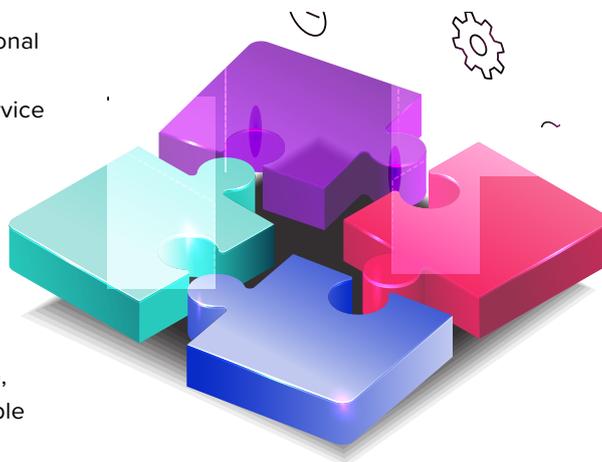
Sycomore AM is organised in 4 units that interact daily with one another:

SALES/MARKETING:

Institutional investors, International Business Development, Distribution Partners, Client Service and Marketing

INVESTMENT: equities

(SRI multi-theme / SRI thematic), SRI Crossover Credit and Flexible Strategies



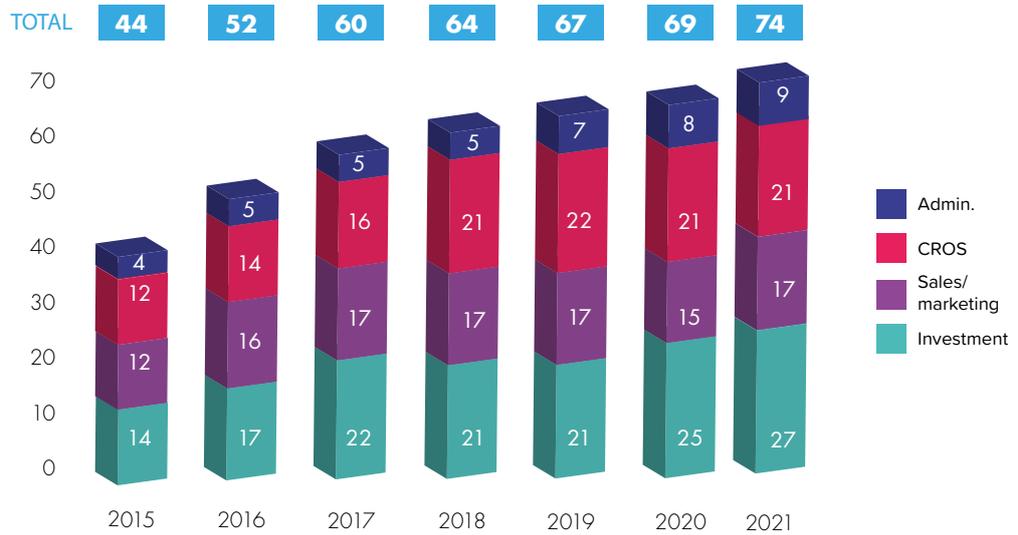
CROS : Compliance, Risk Management, Operations, Systems

ADMINISTRATION:

Human Resources, Finance, Corporate Services, Trading Desk

4.2 our employees

Headcount growth per unit



The average age of our employees is 39.5 (+0.5 year), with 39% of staff aged between 26 and 35. At end 2021, 100% of our staff are employed with a permanent contract and management (“cadre”) status.

Staff turnover⁽⁴⁾ came in at 11 % in 2021 (compared to 14% in 2020) and is aligned with the average of 11% recorded between 2015-2020. This turnover is due to the recruitments within the Investment and Sales teams.

Gender breakdown at different echelons of the structure



In 2021, 30% of Sycomore’s workforce are women, down 5 percentage points compared to 2020.

(4) The turnover is calculated as follows: (departures + arrivals) / (headcount on 31.12.2020 + headcount on 31.12.2021)

compensation policy and pay equity

Sycomore AM has set up a compensation policy based on the principle of “shared value”. 30% to 40% of the value created by the company is redistributed as wages and bonuses, in keeping with our strong focus on human capital and our SPICE analysis model according to which a company can only create sustainable value if this value is shared among its stakeholders.

In this regard, our compensation policy has established the two following principles:

- The overall compensation ratio (after income tax) is limited to a multiple of 25 times the median salary.
- The annual profit-sharing bonus (through the French intéressement scheme) paid annually is identical for all employees (pro rata to the number of months worked during the year), regardless of the individual's tenure or wage level – which is particularly appreciated by our younger employees.

During the 2021 financial year, Sycomore AM signed a Group Profit-Sharing Agreement which will strengthen the profit-sharing policy and thereby benefit all employees.

For more details on our approach, our remuneration policy can be downloaded from our website, on the regulatory information page.

To ensure that our remuneration remains attractive, we mandate the independent consultancy firm Mc Lagan (AON group) to conduct an analysis every 4 years.

Finally, we believe that employee share ownership is a key tool for aligning the interest of employees with the success of our company project and an additional factor supporting recognition and equity. For these reasons, we chose to open the scheme to an even larger number of employees.



4.2 our employees

● zoom on **gender equality** index

In 2021, the firm's male/female wage equity index - set up in 2019, in compliance with the regulation – stood at 78 points/100 for Sycomore AM (compared to 82 points in 2020).

Note that for companies employing between 50 and 250 people, the index is based on 4 indicators:

01 The **gap in pay** between men and women - **2021 score: 23/40**

02 The **gap in annual rises** between men and women - **2021 score: 35/35**

03 The percentage of female employees that received a rise upon their return from maternity leave - **2021 score: 15/15**

04 The number of men and women within the top 10 wages - **2021 score: 5/10**

This decline is due to the lower rating achieved on the gender pay gap calculated based on 4 age groups (all included as the staff are exclusively management status).

Furthermore, for the rating to better reflect the reality of gender equality within Sycomore AM, and due to the rise in staff numbers, a position-based methodology is due to be implemented in 2022, after approval by the ESC.

In a situation where all employees have management (or “cadre”) status, this methodology appears more relevant. For equivalent positions, it requires a tolerance margin of 2% in wages between men and women, versus 5% within a given socio-economic category based on the previous methodology.

The gender equality index is an indicator that is monitored closely by the Compensation Committee which is keen to see the index continue to improve. Consequently, and in compliance with the requirements of the Rixain legislation, Sycomore AM is working on the definition of a target, the identification of levers, and the implementation of tangible actions with a view to achieving this objective.



4.4 well-being at work

● working **conditions**

We believe that fulfilment at work is essential for our employees to feel truly engaged and to ensure the success of our corporate project; we therefore offer a quality working environment and make sure we are attentive to their needs and aspirations.

To assess the quality of its working conditions, at the end of 2020, Sycomore AM mandated the Great Place to Work®, key player for assessing well-being at work, to conduct an anonymous and confidential survey deployed across the firm's entire workforce.

Sycomore AM is up 5 points compared to the previous survey conducted in 2018, and displays a positive perception core of 92, meaning that for 92% of respondents, Sycomore AM is a really good place to work.

Furthermore, the Great Place to Work® survey (92% response rate, with 61 respondents out of a total 66), revealed that:

- For 90% of workers “the office space and facilities contribute to fostering a pleasant working environment”
- 90% of respondents would recommend Sycomore AM (to friends and family) as a “good company to work for”
- 88% of employees say “they are happy to go to work”
- Finally, 92% replied they are “proud to be employed by Sycomore AM”.

On the basis of these results, Sycomore AM has been labelled Great Place to Work®, the only asset management company to have obtained this label in 2021.

In 2021, no work-related accident with lost time was reported.



4.4 well-being at work

**Happy@Work taskforce**

For Sycomore AM, Human Capital and transparency are key success drivers and one of the challenges for the new organization set up during the pandemic was to manage communication within and between different teams.

The following tools were used to foster effective communication:

- Executive communication: bi-monthly letter from the Chairman, presentation of the company's semi-annual results in a plenary meeting (via Zoom)
- Within the teams: weekly Zoom meeting by unit, twice weekly for the investment team, creation of Slack groups
- Between teams: monthly activity review from the CROS unit and sales/ marketing, creation of WhatsApp groups to facilitate discussions
- Preference for manager and team members to hold discussions by phone or Zoom rather than by e-mail.

**Social support for employees**

Sycomore AM is proud to offer its employees access to a concierge service, free of charge. These services, in place since 2017, are provided by RESPONSABILITE, which specialises in care workers and personal support. The company addresses employees' concerns on social issues affecting them personally as well as their family, with full confidentiality.

Since 2017, between 5 and 10% of Sycomore AM's staff use the services of RESPONSABILITE every year to solve personal problems needing social support and or solutions.

Similarly, Sycomore AM has set up an active policy supporting employees who are also parents of young children. This policy, which includes a financial contribution towards the cost of childcare (19 funded in 2021), also assists parents seeking childcare solutions and improves the work/life balance of working parents within the company.

**Team-building**

Team building exercises help to strengthen cohesion and improve dialogue throughout the company - when circumstances allow these events to take place.

Sycomore AM chose to celebrate its 20th anniversary on the HECTAR campus with all of its employees. For a company that has borrowed its name from a deep-rooted and majestic tree, this partnership is all the more meaningful. HECTAR's ambition is perfectly aligned with the mission upheld by Sycomore AM and its foundation, created in 2013. We therefore chose to support HECTAR at two levels: the Fondation Sycomore has partnered up with the Maison Pédagogique (Learning House) and Sycomore AM supports the training campus.

All employees and their partners were invited to the company's 20th anniversary party at the Paris Garnier Opera House. The event celebrated team cohesion with a choreography that all employees were able to take part in. An event was also organized in a restaurant to celebrate the 20 years of the company with employees only.

The lifting of Covid-related health restrictions should allow us to hold a seminar in the first half of 2022.

● hybride **working** conditions



As the Covid-19 pandemic continued into 2021, Sycomore AM ensured it remained able to apply health protocols and the switch to 100% 'working from home' from one day to the next, thanks to the resilience of its Business Continuity Plan and IT systems.

In order to meet these new constraints and changes to our organization, we held a workshop with all employees split into 10 groups on June 29th. The theme was: "How can we make changes to the organisation of our work that will serve our individual and collective performance?"

The outcome of this event was a series of decisions and ambitions that were approved by the Steering Committee and due to come into effect on September 6th.

Sycomore AM agreed on the possibility for two days of remote working per week, while re-asserting the importance of privacy and the right to disconnect as guiding principles behind the scheme to:

- **ensure** that periods of rest and annual leave are duly respected.
- **guarantee a healthy balance** between professional and personal/family life.

Furthermore, as Sycomore AM likes to emphasise oral communication and Monday is a day usually dedicated to team meetings, we felt it was necessary to ensure all were present in the office one day per week, in order to foster cohesion and spontaneous interactions.

As part of this hybrid organization, all employees received a full pack of IT equipment: helmet, camera, laptop.

In the same spirit, several collaborative tools will be set up during 2022 in order to strengthen our collective performance:

- Project management tool,
- Unique internal communications Platform,
- Hybrid work schedule accessible to all,
- Continued development of our Intranet.

Finally, an in-house taskforce will be set up and Sycomore AM will use the services of an architect to rethink the way we use the premises and review the organization of our offices in keeping with our new working patterns.

● digital **frugality**

by David RICHARD, *Head of IT Systems*

The Digital Frugality taskforce met for the first time at the end of 2021. It includes 4 staff members: Jean-Guillaume Péladan, Olivier Cassé, François Bonnel and David Richard. The objective of this taskforce is to identify the best practices that will help save energy through the use of the IT tools made available to staff.

The key issues identified so far are:

- emails,
- files,
- digital frugality when working from home or in the office,
- the best practices put forward by software publishers (Microsoft, for example) or advisory agencies (ADEME).

For educational purposes, the conclusions that have emerged from these meetings will be included in the onboarding manual under a Best Practices heading.

4.5 the **Social and Economic Committee**

Created on May 4th, 2018, the Social and Economic Committee (SEC) is chaired by a President, Amaury Eloy, representing Management, and three elected members of staff: Fatou Nicolas (Treasurer), Florence Jolin (General Secretary) and David Richard.

The Social and Economic Committee is a negotiating body between Sycomore AM's employees and their employer. The SEC acts as the main contact with the employer on individual and collective issues.

On a daily basis, the SEC contributes to staff fulfilment with the implementation of various actions that foster their well-being at work. It also promotes health and safety at work. In this respect, the SEC meets every month to discuss these issues if necessary.

The SEC has its own operating budget which covers its running costs as well as a Social and Cultural Activities (SAC) budget (ASC).

zoom on the SEC's **actions**



In 2021, the SEC was able to honour some of its time-old traditions – put on hold in 2020 due to Covid-restrictions.

At Easter, all employees received a chocolate egg from la Maison du Chocolat – half dark, half milk chocolate to suit all tastes – as a sweet treat!

Fruit deliveries resumed in September, with the delivery of a 4 kg basket twice a week – Mondays and Wednesdays – and two bowls of walnuts on Fridays. Due to the adoption of remote working – two days per week for each member of staff – the quantity of fruit was reduced to avoid waste. A fair balance has been found and Sycomore AM is proud to support the 5 A DAY campaign....

The members of the committee also handed out holiday vouchers, which will lighten everyone's holiday budget whether they travel far or stay closer to home. Digital vouchers are being considered for 2022 to facilitate transactions on web platforms, such as the SNCF website. A reimbursement with proof of purchase may also be considered if the first option is not available with our chosen service provider before 2023.

In addition to the holiday vouchers, our employees received gift vouchers which were 60% higher following a change in legislation. The paper version was replaced by a system of credit cards issued by Swile, which facilitates the process and provides access to a wider range of retailers.

Plans for the children's Christmas party had to be changed at the very last minute due to the resurgence of the pandemic. The evening party with families became a raffle and Christmas present session, for all ages, on the afternoon of December 13th in our premises at 14 avenue Hoche. Four lucky employees won an electric bicycle, an electric scooter, a speaker, and a camera.

Finally, with great regret for committee members and several diligent employees, we put an end to the keep fit sessions by Visio-conference at the end of the first half due to low participation rates (less than 5%). However, the SEC will review the scheme in 2022 to adapt the offer to user expectations. A system of reimbursement "with proof of purchase" for any sport activity seems the most likely option for 2022.

4.6 happy at work

● supporting **career development** and **employability**



Training

At Sycomore AM, we care about the development of skills and careers and place an emphasis of training as a lever for employee fulfilment and performance. Some training modules are compulsory – such as the AMF certification for employees serving in specific positions. Other training needs were identified during the annual performance reviews, including foreign language skills, financial skills (CFA), sustainability or management programmes. The training policy also enables team members to choose their own programmes (other than the compulsory modules). Thanks to a portal providing access to over 20,000 training programmes, designed in partnership with skillup.co, employees are able to benefit from training depending on his/her requirements or interests.

We also provide in-house training programmes designed to facilitate the transfer of knowledge and skills between staff members.

Sycomore AM ramped up the learning support provided to employees. Training costs borne by Sycomore AM rose 30% compared to the previous year (and +120% since 2019). As a result, in 2021 and 2020, the company exceeded its objective – which was to spend 2% of its total fixed payroll on training – as these costs accounted for 2.23% in 2021 and 2.03% in 2020.

Finally, Sycomore is keen to contribute actively to the transfer of knowledge and skills to student interns who are starting their careers. The Covid-19 pandemic and remote working practices made it more difficult than usual for final year students to find an internship; Sycomore intensified its efforts by welcoming and training as many as 13 interns in 2021 (up from 10 in 2020 and 4 in 2019).



Employees... and learners

One of the measures to emerge from the workshop on hybrid working methods is for each employee to strengthen their skills by allocating 5% of their time (two to three hours per week) to professional and personal development and improving their skills (hard skills, soft skills, occupational benchmark, personal R&D). The employee takes a step back from his or her daily work and dedicates this time to in-house and/or external training sessions, professional circles, discussions, and seminars.



Upgrading our style of management

This new and hybrid system must enable Sycomore AM to transition towards a management style that is more personal and consistent, to facilitate the management of operational priorities and the coordination of our collective effort.

Beyond drawing up an individual roadmap at the beginning of each year, this shift will entail more regular monitoring and quarterly reviews between managers and their teams.

mission committee's **conclusion** on the achievement of statutory objective #3

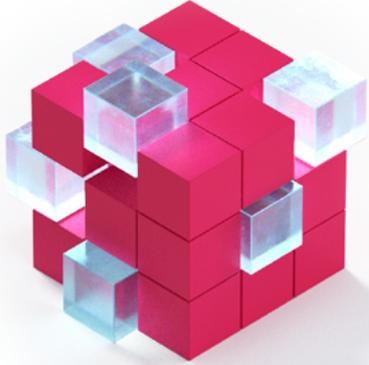
To offer our employees a quality working environment and involve them in strategic decisions while preserving the entrepreneurial spirit through employee share ownership

Sycomore AM has ensured it has maintained a high-quality working environment for its staff by applying the government's recommendations in the context of the global health crisis, and by working on the development of new working methods. The emphasis was put on training, with a training budget up by 30% compared to 2020, and on the possibility for all employees to allocate some of their working hours to personal development. The results of the GreatPlaceToWork® survey conducted at the end of 2020 showed how attached our employees are to their company. Sycomore AM also makes it a point of honour to offer extra-financial advantages to its staff and is happy to adapt its offering according to collective preferences.

The gender equality index and the percentage of women on the company payroll are down in 2021 compared to 2020. The Mission Committee will ensure that a target on gender equality is set, and on a broader level, that mechanisms designed to improve the balance between male and female representation at different echelons of the company are implemented.



5.1 our societal capital strategy



As far as the Society stakeholder is concerned, our main lever for creating positive societal contributions is through our investment strategies. For this reason, to help us fulfill our mission, we have pledged – as stated in our articles of association – to measuring and improving the societal contribution of our investments, while ensuring our communication with clients is both transparent and informative.

Meeting this commitment required developing tools enabling us to quantify and report the contribution of our investments to the transformation of the economy. To this end, from 2017, Sycomore AM has worked on the development of its own proprietary methodology, dedicated to measuring the Societal Contribution of a company⁽⁵⁾.

In addition to the development of investment strategies designed to contribute positively to societal challenges, we have chosen to share some of the management fees generated by our thematic funds with charities. Since 2020, a percentage of the management fees from Sycomore Shared Growth is redistributed to charities running high-impact societal projects on the theme of “Transmission”, in partnership with the Fondation Entreprendre. Similarly, some of the management fees generated by Sycomore Global Education, created in 2021, are paid to the agricultural campus Hectar..



Convinced in the important role played by collaborative and collective actions for the development of a purposeful finance, able to rise to the current societal and environmental challenges, we are actively involved in promoting a sustainable economy and contributing to the growth of SRI within our ecosystem, with companies and investors. We have committed to initiatives for the promotion and the development of responsible investment and are involved in investor coalitions specialized in key issues, we give talks in universities, publish articles, and run events that are a testimony to our engagement and our vision of the future.

Running alongside our commitment as a responsible investor, Sycomore AM also intends to create a positive impact for society through corporate citizenship. Created in 2013, the Fondation Sycomore supports a wide range of initiatives run by charities and designed to build bridges between the young and the corporate world. Sycomore AM redistributes 1% of its operating income to the Fondation Sycomore.



(5) For more information, please read our [Societal Capital Strategy](#).

5.2 the societal contribution of our investments

● societal contribution

We measure the societal contribution of our investments through the Societal Contribution (SC) of the products and services offered by investee companies, and through The Good Jobs Rating.

Within the Societal Contribution (SC) of products and services, the main societal challenges are split into three pillars: Access & Inclusion, Health & Safety, Economic & Human Advancement. The SC is a quantitative metric ranging between -100% and +100%, that aggregates the positive and negative societal contributions of a company's products and services. The total contribution is the sum of the contributions of each activity to the 3 pillars, as a percentage of the sales these represent. The methodology is based on the societal dimensions of the 17 Sustainable Development Goals (SDGs) set by the United Nations and on the 169 underlying targets, which provide a common road map for private and public players, with a view to achieving a better and more sustainable world for all by 2030⁽⁶⁾. The SC also incorporates macroeconomic and scientific data provided by public institutions, as well as renowned independent sources such as the Access to Medicine Foundation or the Access to Nutrition Initiative. Some of the issues included within our analysis are not addressed directly by the Sustainable Development Goals – such as cybersecurity and the fight against obesity.



The Good Jobs Rating is an innovative data analysis tool developed in partnership with The Good Economy aimed at assessing the societal contribution of a company as an employer. This touches upon the contribution of a company to the UN's 8th Sustainable Development Goal: access to decent work for all.

Quantifying the societal impacts of economic activities is a vast field of research, currently undergoing major development. This comes with many challenges, including the diverse nature of issues and interactions, the difficult task of objectifying and quantifying societal phenomena, local specificities, and the lack of consensus on the solutions that can be found to different problems. Aware of these difficulties and therefore humble on the precision and exhaustivity we can offer, the objective of the metric developed by Sycomore AM is to compare, with as much objectivity as possible, the ability of different business models to address the major societal challenges we are facing today.

(6) For more information of the 2030 Agenda and the Sustainable Development Goals, please refer to: <https://sdgs.un.org/fr/goals>

5.2 the societal contribution of our investments

After publishing the Societal Contributions of our SRI funds using this metric as a selection criterion at the end of 2020, we are now disclosing the Societal Contribution of products & services of Sycomore AM's investee companies for the very first time. This stands at **+29%**⁽⁷⁾ with a coverage ratio of 91% (weight).

This largely positive net societal contribution reflects the positioning of 37% of the firm's AUM at end 2021 managed using the SC as one of the investment criteria: this is the case of the Sycomore Shared Growth fund, which focuses on companies offering solutions to major global challenges, with exposure to the healthcare, personal care, sustainable food, and sustainable mobility sectors.

2021 saw the launch of two funds offering largely positive societal contributions:

- **Sycomore Inclusive Jobs**, with a focus on decent work, displays a societal contribution of +40%
- **Sycomore Global Education**, with a focus on education for all, displays a societal contribution of +34%.

The creation of both these funds contributes directly to our objective which is to raise the societal contributions of all of our investments.

More information of the societal contributions of funds and underlying companies is available in the 2021 Responsible Investor reports published on June 30th 2022.

zoom on the deployment of our human rights policy

Drawn up with input from our employees and external stakeholders, our Human Rights policy was published in 2020, aligned with the UNGP - United Nations Guiding Principles on Business and Human Rights. This policy serves as a framework to ensure that issues pertaining to human rights are duly considered, both in our role as a company and as an investor. This was our first step on the road to strengthening our approach to human rights.

Consequently, in 2021, we worked on the deployment of this policy across all our processes, as a company and as an investor.

(7) Calculated based on the invested segment of the portfolio, with a 91% coverage ratio (weight), excluding funds of funds, or 98% of all Sycomore AM's assets under management.

On the investor side, the objective is to deepen our analysis method when calculating the exposure of the companies within our investment universe to human risks, and the way these risks are managed. This analysis is already covered by the Society pillar of our SPICE ESG proprietary model. **In this respect, we have run three projects:**



- 01 **mapping of the analysis criteria within our SPICE model** in relation to the main human rights risks affecting employees, society, and consumers.
- 02 a proposal to **review the human rights analysis criterion within the Society pillar**. The objective is to identify the level of alignment of a company's Human Rights approach with the three aspects of the UN's Guiding Principles on Business and Human Rights: human rights policy, reasonable due diligence, and whistleblowing mechanisms.
- 03 a framework **for analysing the key human rights risks** to which companies may be exposed, in order to pre-identify potential key risks for each major sector and region.



This work will continue into 2022 to incorporate the proposals made for the SPICE model and to train the investment team in using this new framework for analysing human rights. This work is crucial for managing the key negative impacts as part of the European SFDR regulation.

On the company side, a taskforce including Amaury Eloy (RH), Anne-Claire Imperiale and Sabrina Ritossa-Fernandez (ESG), Giulia Culot (Investment), David Richard and Fatou Nicolas (SEC) was created in order to identify the key risks to which Sycomore AM is exposed with its stakeholders, excluding investee companies. Eight priorities were raised:

- Working conditions and hours for employees and sub-contractors,
- Fair pay, for employees and sub-contractors,
- Protection and monitoring of personal data,
- Freedom of association,
- Whistle-blowing systems,
- Discrimination and harassment,
- Right to disconnect,
- Health and safety at work.

This taskforce will continue its work in 2022 to incorporate issues identified during the first sessions into Sycomore AM's procedures, where relevant.

mission committee's **conclusion** on the achievement of statutory objective #1

To measure and improve the environmental and societal contribution of our investments while providing transparency and a learning experience for our clients

With the publication of the societal contribution of products and services for portfolio companies, Sycomore AM has successfully deployed its methodology. Split into different sector frameworks, the methodology mainly draws from the 169 targets of the UN's 17 Sustainable Development Goals to identify the activities that contribute towards societal and global priorities. Achieving a high contribution of +29% is further proof that Sycomore AM's investment decisions support activities that have a positive impact on society.

The work conducted in the field of human rights has proven complementary to the measurement of the societal contribution of portfolio companies' products and services in achieving statutory objective #1. Both are essential in enabling Sycomore AM to manage the negative impacts of its activities, notably in response to European regulation on transparent disclosure for sustainable finance.

The two priorities identified by the Mission Committee for the next couple of years with a view to achieving statutory objective #1 are: to set a target for the societal contribution of investments, and to continue the deployment of the Human Rights policy.



5.3 the fondation

our **fondation**

The Fondation Sycomore is a tangible expression of our firm commitment to corporate citizenship.

its **history**

Created in 2013, The Fondation Sycomore aims to build bridges between the young generations and the corporate world. Aware that today's children are tomorrow's decision-makers and driven by our conviction that human considerations are central to developing a sustainable economy, we have chosen to focus our Foundation's work on secondary school pupils: from their school days and career choice decisions until they start their first jobs.

The Foundation is funded using a percentage of Sycomore AM's profits (1% of its operating income) and donations from Sycomore Corporate Finance and Sycomore Family Office.

its **project**

Through their years of work and experience, Sycomore AM's team members have developed a sound understanding of the corporate world and of the European economic landscape. The Foundation's ambition is to share this expertise, network and experience with the younger generations. By enabling children, teenagers, and young adults to discover the business world by meeting entrepreneurs and listening to their experiences, we hope to help them fulfil their own ambitions and clarify their career choices. Thanks to the support given by the Foundation, these pupils have benefited from valuable insights into the world of business.



5.3 the fondation

● structural partnership

● Fondation pour l'Écriture - Labo des Histoires



The Fondation pour l'Écriture was founded in 2018 by the Académie des Sciences Morales et Politiques and the Fondation Sycomore together with three other corporate foundations (Fondation Aéroport de Paris, Fondation M6 and Fondation SNCF). It supports initiatives designed to spread the pleasure of creative writing among a target audience of children, teenagers and young adults who would otherwise not have access to this activity. The Fondation pour l'Écriture supports the Labo des Histoires, which offers children, teenagers, and young adults (under 25) free writing workshops where they can develop their writing and reading skills, but also their imagination and creativity. In September 2021, the Fondation pour l'Écriture was behind the first event held in celebration of writing and speech: La Belle Harangue.

● Fondation Epic



The Fondation Epic, created by Alexandre Mars in 2014, identifies and financially supports organisations that fight against inequalities affecting children and young adults in terms of access to education, healthcare, social security, or social and professional inclusion. This vision, which is perfectly aligned with ours at La Fondation Sycomore, has enabled us to establish a meaningful partnership over the past 5 years and support several of the associations that were selected over three-year periods, through Epic. Since 2020, the Fondation Sycomore has supported the Duo For a Job project.

● United Way L'Alliance



As a long-standing partner of the Fondation Sycomore over the past five years, the United Way L'Alliance charity strives to improve equal opportunities and school attendance with young people living in deprived or rural areas, to help them make informed decisions for their future. The Fondation Sycomore takes part in running "career days" at Sycomore AM's premises and on-site visits that enable secondary school pupils from Tremblay-en-France to find out about a wide range of jobs and occupations.

● The HECTAR Farming Campus



In over 600 hectares of land just outside of Paris, Hectar offers a training campus, a start-up and innovation accelerator and a pilot farm in regenerative farming. Hectar also provides coworking or seminar facilities and an awareness programme targeting the young. La Fondation Sycomore has entered a partnership with the Hectar "Learning House", as raising children's awareness on the agricultural and environmental transition is key to preparing our future. This "Learning House" is also a venue for meeting inspiring professionals who will enable these students or schoolchildren to discover new career opportunities within the agri-food and farming sectors.

charities **supported** in 2020 and partnerships renewed in 2021

Charities supported in 2020

The Foundation believes in supporting charities over a full three-year period and gave financial backing to the following in 2020 – 2021: Proximité, Massajobs, CulturePrioritaire, Osons Ici et Maintenant, l'École à l'Hôpital, JobIRL.



New partnerships in 2021

While the Fondation Sycomore continued to provide long-term support the charities listed above, it is also keen to offer opportunities to new potential partners. In 2021, we entered new partnerships with Synlab, Unis-Cité, Wake Up Café, Espérance Banlieues, L'Institut Imagine, La Grande Tribune, la Caisse Etudiante de Solidarité Sociale et Environnementale.



zoom on the **institut imagine**

In 2021 - 2022, the Fondation Sycomore has supported the Institut Imagine and more specifically one of the organisation's Human and Social Science projects "Imagine la Suite" which seeks to improve living conditions for patients suffering from a genetic disease, from their school years to their first job. Together, the Fondation Sycomore and Institut Imagine have outlined a comprehensive care system for young adults affected by a rare genetic disease and having to live with a visible or invisible disability, to help them plan their future.

imagine
INSTITUT DES MALADIES GÉNÉTIQUES

The Foundation's ambitions for 2022

The Fondation Sycomore will continue with its initiatives and renew the partnerships that have been established over the years, while relying on regular support from Sycomore AM's employees. After two difficult years in 2020 and 2021, when physical gatherings were restricted by the pandemic, our ambition for 2022 is to reach out to our partners, partners and students by taking part in on-site events.

mission committee's **conclusion** on the achievement of statutory objective #4

To strengthen our own societal contribution by sharing some of the value created with charities, notably via the Fondation Sycomore

Every year, the foundation's activities are a testimony to Sycomore AM's pledge to support young people at different stages of their schooling and enable them to discover the corporate world. Direct involvement by staff members in the various activities offered by the Foundation lies at the heart of Sycomore AM's corporate culture and is perfectly aligned with its mission: to deliver positive impacts beyond its asset management activities.

Sycomore AM also plans to share some of the management fees generated by several of its funds with charities supporting causes aligned with the environmental, social, or societal causes highlighted by the funds concerned, as is already the case with the Sycomore Shared Growth and Sycomore Global Education funds.



5.4 our responsible procurement policy

In 2017, we set up a working group whose mission was to draw up a responsible procurement policy aligned with our approach to sustainable development. The objective of the policy is to develop an environmental and societal dimension through the measurement and reduction of our environmental impacts (use of environmentally sound products, energy-efficiency, waste management...), but also to optimise costs and involve our partners, team members and all of our stakeholders.

To ensure the effective implementation of our responsible procurement policy, we established a responsible procurement committee in 2018, notably for sales commitment above €10,000 (excluding recurring contracts). The committee also ensures that our suppliers adopt a responsible approach, where applicable.

In 2021, CSR criteria were officially added to two tenders for selecting service providers. Furthermore, the taskforce working on the deployment of the “corporate” side of our human rights policy has identified recommendations to ensure a better integration of the issues associated with decent work in our procurement practices.

The inclusion of CSR criteria to the tender process is a positive practice that contributes towards achieving statutory objective #5.

In 2022, the Mission Committee will work on the definition of targets with a focus on statutory objective #5. This will involve the disclosure of further details on how Sycomore AM intends to improve the systematic application of its responsible procurement policy with its main suppliers.



6.1 our natural capital strategy

The environment is a “shared capital” that includes all public goods that supply ecosystem services, as defined by the Millenium Ecosystem Assessment in 2005. Since 2016, Sycomore AM has publicly adopted a natural capital management strategy based on a scientific, holistic, and transparent approach. This approach considers the leading environmental issues: climate, water, resources and waste, biodiversity, and air quality, with no particular order of priority.

Sycomore AM’s most significant environmental impacts are indirect and caused by the businesses we finance through our investments. **We therefore pay considerable attention to improving our understanding, assessment and management of the risks, opportunities and impacts that are created.**

Furthermore, aware that we have a duty to set an example, we also make efforts to manage our own direct environmental impacts. The main direct impacts are home-office commutes, business travel, energy consumption and the waste generated within our offices.

2021, a year of disruptions for the biosphere

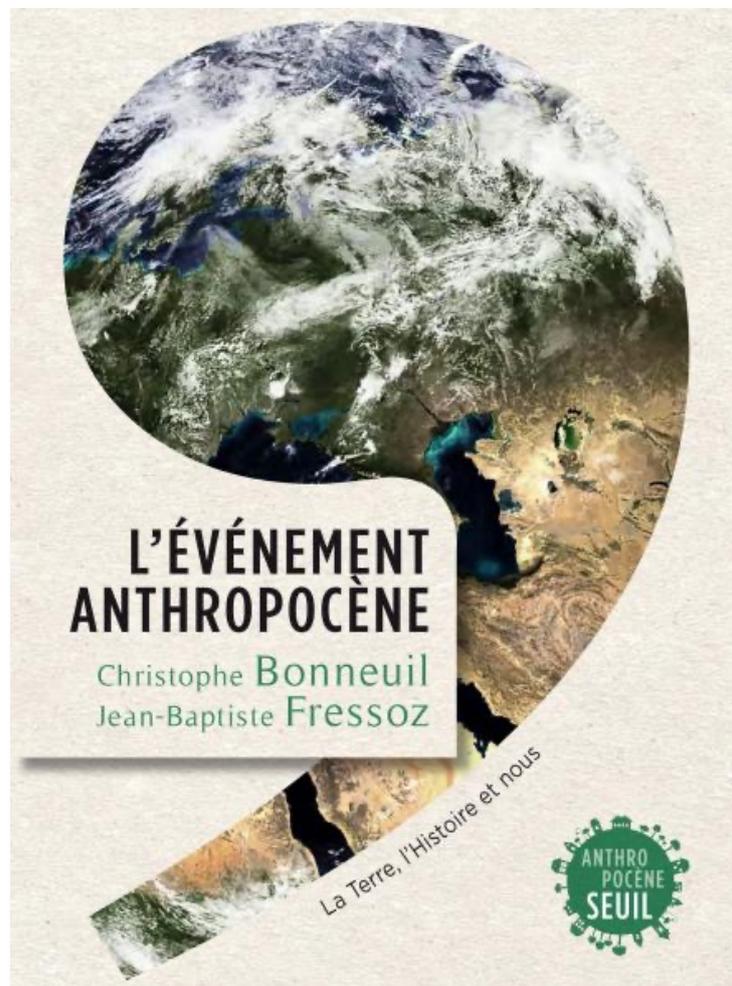
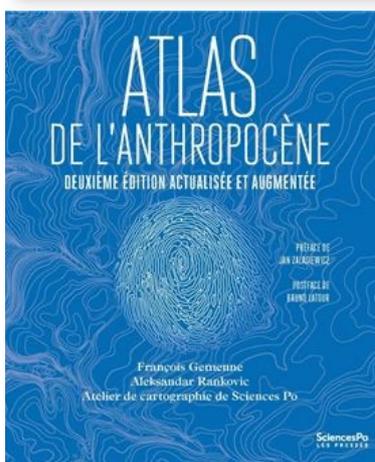
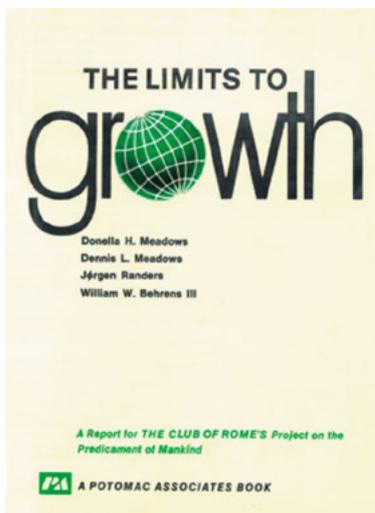
2021 saw the acceleration of warnings on the state of the biosphere, including new temperature records, increasingly frequent extreme weather events, and urgent calls for action from the academic world, including the first section of the IPCC’s 6th report – AR 6, on scientific aspects, followed by the second part in February 2022 called “Impacts, adaptation and vulnerability”, and the third, “Mitigating Climate Change”. In early 2022, the Stockholm Resilience Centre, SRC, published a survey⁽⁸⁾ arguing that a 5th planetary boundary had been crossed – a broad concept that covers “all new substances, modified lifeforms, and including chemicals and any other type pf matter or organisms previously unknown to the Earth’s system, as well as existing natural substances such as heavy metals, caused by human activities”. In April 2022, a new article announced that we had crossed a 6th boundary: freshwater use, meaning the water stored in soil and biomass. Out of the 9 planetary boundaries that have been identified, the other 4 that have now been crossed are Nitrogen and phosphorus flows to the biosphere and oceans, loss of biosphere integrity (biodiversity loss and extinctions), land use and climate change. Never has the danger to the environment and the resulting impact on the poorest been greater. Finally, 2022 saw the 50th anniversary of the report drawn up by the Club of Rome ‘The Limits to Growth’ which proved, based on fact, the physical impossibility of infinite growth in a finite world.



(8) Cf. Outside the Safe Operating Space of the Planetary Boundary for Novel Entities, February 2022, <https://pubs.acs.org/doi/10.1021/acs.est.1c04158>

6.1 our natural capital strategy

The concept of Anthropocene, or human era, was created around 20 years ago and made popular by Paul Joseph Crutzen and Eugene Stroemer. This epoch, which comes after 11,000 years of Holocene, is a period of stable and temperate climate, and designates the new geological epoch when the **influence of humankind on geology and ecosystems became significant on the scale of the Earth's history**. Now thoroughly documented, for example in the Atlas de l'Anthropocène⁽⁹⁾, the concept explains that “what is happening is not an environmental crisis but a human driven geological revolution”⁽¹⁰⁾. With a grounding in both science and history, the notion of Anthropocene helps us understand that we have not entered an environmental crisis, but that the world has **crossed a threshold and entered a new “condition”**.



In this urgent context that calls for deep transformation, we have accelerated our efforts in the areas of:

- Biodiversity,
- Environmental roadmap,
- Climate tool kit.

(9) Cf. Atlas de l'Anthropocène, second edition (updated and expanded) by François Gemenne, Aleksandar Rankovic, foreword by Jan Zalasiewicz, afterword by Bruno Latour, SciencesPo, 2021.

(10) Cf. L'événement Anthropocène, by Christophe Bonneuil and Jean-Baptiste Fressoz, Seuil, 2013 and 2016.

6.2 towards measuring the biodiversity footprint of our investments



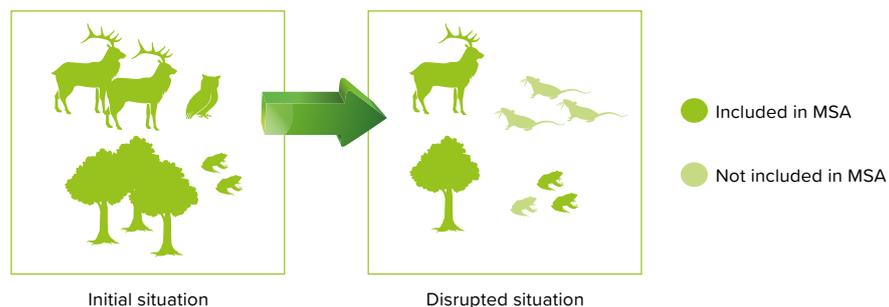
● biodiversity, from theory to practice

As a first step, we continued our exploratory work with the Corporate Biodiversity Footprint (CBF), following the tender launched in January 2020 alongside other asset managers (11). In 2021, our partners Iceberg Data Lab and I Care ramped up the methodological deployment of the metric, which now covers all economic sectors, as well as the disclosure of results, which are now available for 64% of our invested universe. Our presence on the CBF Steering Committee enables us to share and discuss in more depth any issues relating to the methodology, the use and aggregation of results with 5 other users, and address underlying challenges: choice of denominator, double counting, readability of results disclosed to clients, etc. This work allowed us to:

01

A better **understanding** of the km^2 MSA, a unit for measuring the biodiversity footprint

The PDF km^2 for “Potentially Disappearing Fraction of species and the MSA km^2 for “Mean Species Abundance” are the two most frequently used units for measuring physical impacts: they represent artificialized land surfaces. The CBF relies on the concept of MSA or means species abundance, which varies from 0% to 100% - whereby 100% means that the mix of species is totally intact and 0% means that all original species have disappeared locally. The MSA is calculated based on the abundance of individual species under the influence of a specific type of pressure, compared to their abundance in a non-disrupted situation - the benchmark natural situation. Only the species that are present in the initial situation are considered and only declines are taken into account. This will avoid the risk of the indicator being artificially raised by opportunistic, general, or invasive species that are taking advantage of the disruption to natural habitat.



For example, in the above illustration, three species have seen a decline in their abundance (tree, deer and owl) and two are rising (frog, rodent). Since new species and the increased abundance of pre-existing species are not taken into account, the MSA is calculated as the average abundance of the four species in the benchmark situation, as the methodology ignores the presence of the frog and the invasion by rodents.

The result disclosed by the CBF at company level tends to be negative (loss of biodiversity) and is expressed in MSA km^2 of loss of initial biodiversity from 100% to 0%, i.e. the **km^2 that the company's activities keep artificialized.**

(11) https://www.sycomore-am.com/5e30473c-CEI_-_Biodiversity_CP_VF.pdf

6.2 towards measuring the biodiversity footprint of our investments

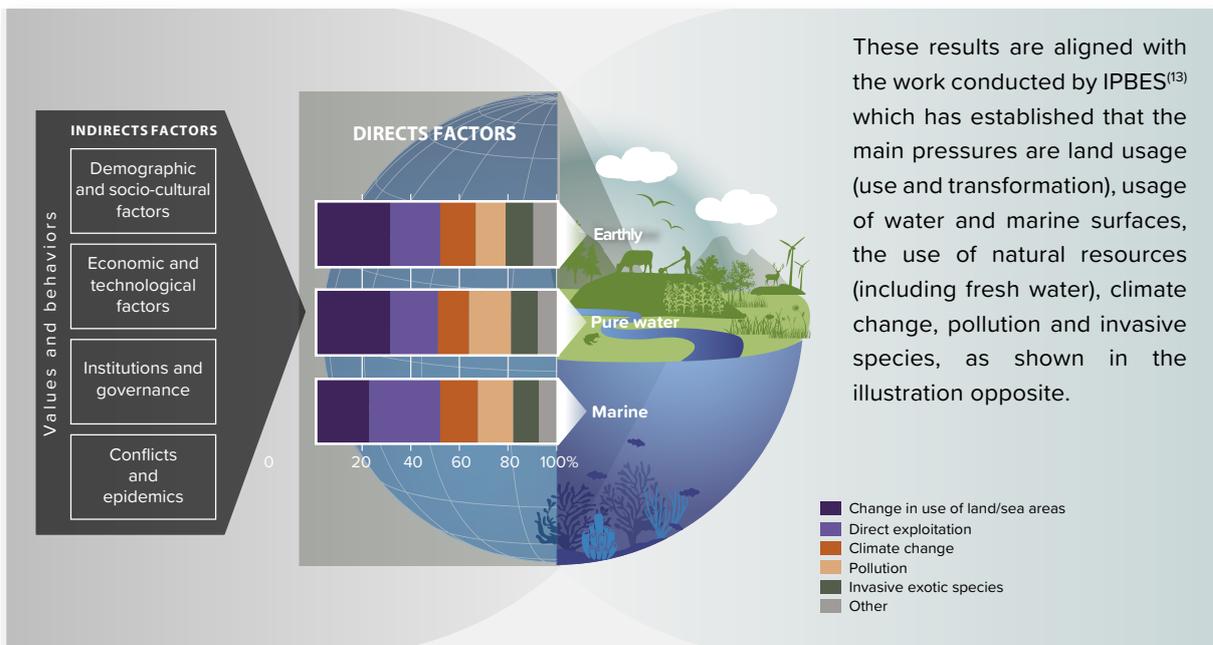
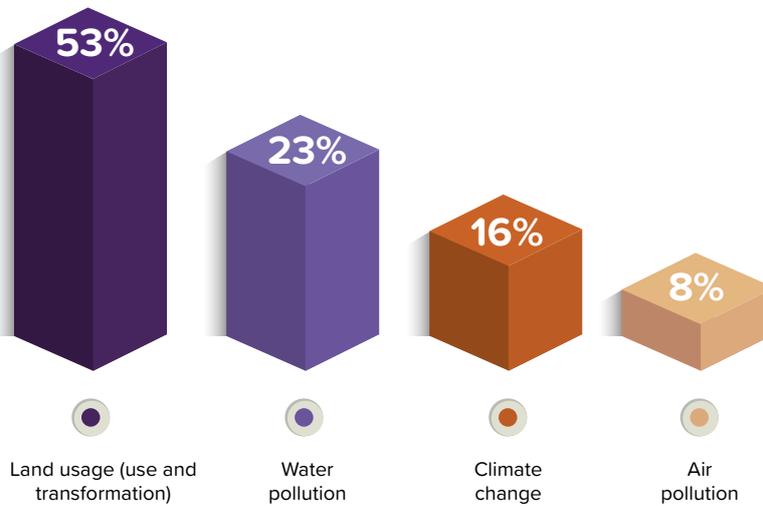
02

Begin to **quantify** the weight of various types of pressure on biodiversity

The first set of results enabled us to examine the relative contribution of different environmental pressures on biodiversity footprints as captured by the CBF.

We have identified four types of pressure; their average respective weights (equal-weighted) within our investment universe are the following⁽¹²⁾:

Weight of different types of pressure on biodiversity as captured by the CBF



(12) Preliminary results calculated on a sample of 582 stocks representative of our investment universe, with CBF v2.11 calculated by Iceberg Data Lab based on data from 2019, 2020 and 2021.

(13) Cf. Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES), created in 2012, is in some ways the equivalent of the IPCC for ecosystems and biodiversity, <https://ipbes.net/models-drivers-biodiversity-ecosystem-change> and illustration taken from the global report on biodiversity and ecosystem services, 2019, p25, cf. https://ipbes.net/sites/default/files/2020-02/ipbes_global_assessment_report_summary_for_policymakers_fr.pdf

6.2 towards measuring the biodiversity footprint of our investments

● biodiversity, from theory to practice

Meanwhile, we also joined the **Partnership for Biodiversity Accounting Financials (PBAF)**, an international platform launched in 2019 that published a first version of its “PBAF standards⁽¹⁴⁾” in 2020. These standards offer a series of best practices for financial institutions, to help them assess the impact and dependency of their investments with regards to biodiversity. We joined the taskforce that specializes in asset management and took part in drawing up the chapter dedicated to our industry in the 2022 Guide.

The work conducted with the PBAF enabled our team of ESG analysts to receive training. Run by Pré Sustainability, a partner of the platform with expert knowledge in biodiversity issues for financial institutions, the session was designed to present the tools and databases that will help identify and measure dependency and impacts between a company and its surrounding ecosystem.

Finally, we also took part in writing up the whitepaper published in September 2021 by the French Sustainable Investment Forum (SIF) “Finance and Biodiversity⁽¹⁵⁾”, and joined the working group run by Finance for Tomorrow and dedicated to biodiversity.



(14) About PBAF | PBAF - Partnership for Biodiversity Accounting Financials (pbafglobal.com)

(15) Cf. https://www.frenchsif.org/isr-esg/wp-content/uploads/FIR-IcebergDataLab_Finance-Biodiversite_sept21.pdf

6.3 our environmental roadmap

our **contribution pathway**
for 2030

In 2020, Sycomore AM became a mission driven BCorp™ certified company, committed to increasing our alignment with the environmental and climate transition. In 2021, we developed a quantified trajectory for 2030 and set new milestones in terms of climate and biodiversity. This forward-looking projection is aligned with article 29 of the French law on Energy and Climate enforced in 2021, with our approach as a mission-driven company, and with the pledge made to the Science Based Targets (SBTi) initiative to test the sector framework dedicated to finance, the SBTi for Financial Institutions.

Historical review with the 5 targets set for 2030

Indicator	Methodology	2018	2019	2020	2021	Cible 2030
NEC (%)	NEC 1.0 across all AUM as of 31/12/year Y (coverage > 95%)	+4%	+7%	+10%	+10%	≥+20%
Portfolio-induced temperature rise (°C)	Science-Based 2°C Alignment method, SB2A, as of 31/12/year Y, applied to all equities and bonds (coverage of all invested equities and bonds)	+2,3°C (23%)	+2,2°C (39%)	+2,1°C (38%)	+2,3°C (53%)	<+2°C (≥ 70%)
Percentage of portfolios aligned with a +1.5°C according to SBTi (%)	Equities and corporate bonds with an SBTi approved target of +1.5°C across all AUM as of 31/12/year Y	1%	8%	14%	32%	≥40%
Percentage of portfolios aligned with a +2°C or under according to SBTi (%)	Equities and corporate bonds with an SBTi approved target of +2°C or under across all AUM as of 31/12/year Y	3%	11%	22%	44%	≥56%
Absolute GHG emissions across scopes 1 & 2	In t eq.CO ₂ / year (reduction as a % from the benchmark year: 2019)	na	9 (0%)	3 (-66%)	3 (-66%)	≤4,5 (-50%)

6.3 our environmental roadmap


 a **two-tier** environmental roadmap

As a company, we measure and seek to reduce our environmental footprint, notably our carbon footprint (established using the GHG Protocol standards) across our value chain – excluding investments. This is the footprint on which we have direct (scope 1 in terms of GHG emissions) as well as indirect influence, through our energy consumption (scope 2 in terms of GHG emissions), our purchases of goods and services and business travel (upstream scope 3 in terms of GHG emissions). This footprint also includes an assessment of the footprint associated with our employee savings scheme. The goal for 2030 is listed in the final line of the table, and involves:

- **Cutting our absolute GHG emissions by 50% on scopes 1 & 2** compared to 2019, i.e. total emissions below 4.5 t eq.CO2 by 2030,
- **Maintaining** a power supply that is **100% renewable** and a **vehicle fleet that is 100% electric**.

As an Investor, we measure our alignment with the environmental transition through the Net Environmental Contribution (NEC), a science-based and holistic indicator that quantifies relative environmental impact, and by assessing our absolute indirect impacts on biodiversity. In addition, we use purely climate-driven alignment indicators (SB2A and SBTi) as well as assessments of our absolute indirect impacts on biodiversity (cf. Corporate Biodiversity Footprint, CBF) and on the climate (GHG emissions of investee companies, accounting for most of our downstream scope 3) through the securities in which we invest daily. The goals for 2030 appear in the top four lines of the table, and involve:

- **Rising the NEC of all assets managed by Sycomore AM to +20%**, compared to the average NEC of leading European indices, which stands at 0% (STOXX 600) and +10% in 2020 and 2021 (and +4% in 2018) for Sycomore AM. This is by **far the most comprehensive and demanding goal** (97% coverage ratio in 2021) as it requires a **double alignment on the issues of biodiversity and the climate**. To achieve this goal, Sycomore AM will need to continue adjusting its fund range to ensure the strategies become even “greener”, a process that has been on-going since in 2015.
- **Improving the firm’s alignment with climate factors**. This process draws upon Sycomore AM’s climate toolkit:
 - SB2A temperature models, based on the NEC and conducted in 2020 and 2021, suggest that an SB2A induced temperature rise below +2°C is consistent with a NEC above +20% (cf. first goal for 2030, and coverage ratio > 95%)
 - An average SB2A temperature rise below +2°C by 2030 effectively measured on a large section of the firm’s equity and bond investments (53% in 2021)
 - A substantial rise in the percentage of equity and bond investments displaying SBTi-approved targets, with a view to reaching **56%** in 2030 and **40% for +1.5°C targets**.

(16) NEC 1.0 score calculated by Sycomore AM based on the index constituents as of 31/12/2020 and as of 31/12/2021 with a coverage ratio of 96% (weight) and entry data provided by companies based on 2018, 2019 and 2020.

6.3 our environmental roadmap

a continual **improvement process** to help us achieve our pledges

These public pledges imply substantial human and financial investments to ensure our approach has a solid grounding, including:

- **Updating the metric on an annual basis and continuing to reduce our environmental footprint, notably our carbon footprint as a company**, compared to the benchmark year of 2019. Beyond the pledges that we have made, this includes exploring potential improvements: within the company via digital frugality, with our suppliers, and through our employee savings scheme via our partner ERES,
- **Continuing to invest in the NEC as the bedrock of our holistic Biodiversity & Climate approach, by strengthening our expert user calculation capacity and bolstering the NEC Initiative's ability to offer an open and international industry standard**. In 2021, these efforts were materialized with the creation of the mission-driven company, NEC Initiative, and with the €1.5M investment made by Sycomore Factory as part of the entity's first fundraising, for a total of €2.4M⁽¹⁷⁾ ;
- **Upholding the efforts deployed with training our professionals and our clients on environmental impacts**, such as the 8 training sessions organized in 2021 on the NEC 1.0 and the dedicated session focusing on biodiversity run with support from the Biodiversity Accounting Financials, PBAF, or the many talks given on biodiversity and contributions to the environmental transition
- **Continuing our R&D efforts and our data and license purchases** on Biodiversity & Climate alignment metrics. Examples include our contribution to the NEC 1.1 project, methods and models for induced temperature rises, and biodiversity impact metrics.



(17) Cf. press conference on January 11th 2022 and <https://nec-initiative.org/nec-initiative/sustainable-investors/>

6.4 our environmental footprint

● results achieved in 2021

In 2021, the order of magnitude of our impacts as illustrated by the carbon footprints over our different scopes has remained stable. These confirmed:

- A factor of 300 between our scopes 1 & 2 GHG emissions and our upstream scope 3 emissions
- A similar order of magnitude between the GHG emissions for the perimeter of our firm, i.e. scopes 1, 2 and upstream scope 3, and those of our employee savings scheme (factor of 1.15 in 2021 compared to a factor of 2 in 2020). Note that in 2021, we worked with ERES to increase the percentage of SRI-certified investments within our employee savings scheme
- A factor of 2000 between the GHG emissions of our downstream scope 3 emissions, the portfolios managed, and the perimeter of our firm (scopes 1,2 and upstream scope 3).

The following table summarises the results in terms of GHG emissions in 2021, according to the 2021 GHG Protocol compared with 2020 data, shown in brackets.

Perimeter	Company		Investments	
	1, 2 and upstream 3 amount - operational perimeter	Shareholder savings scheme (excl. GHG Protocol)	1, 2 and upstream 3 for investments	1, 2 and 3 (up and downstream) for investments
Scope				
Source	Sycomore AM and I Care tool ⁽¹⁸⁾		Trucost/S&P ⁽¹⁹⁾	Trucost/S&P ⁽¹⁹⁾ + downstream scope 3 estimate based on a ratio of 2 applied to the sum of other scopes
t éq.CO ₂ in 2021 (versus 2020)	861 (630)	988 (1 225)	1 556 000 (1 380 000)	4 669 000 (4 140 000)
Representative indicator 2021 (2020)	11 t éq. CO ₂ per year and per FTE (10)	15 t éq. CO ₂ per year and per FTE (19)	170 t éq. CO ₂ per year and M€ in AUM (182)	510 t éq. CO ₂ per year and M€ in AUM (545)
Ratio with operational footprint (2020)	1	1,15 (2)	1 807 (2 081)	5 423 (6 244)

(18) Assessment by I Care for 2020, with an uncertainty margin +/- 37%, and assessment by Sycomore AM using the I Care tool over 2021 with a calculated uncertainty margin of +/- 35%.

(19) Aggregated scope 1, 2 and upstream scope 3 emissions from Trucost/S&P as of 31/12/2020 a.d 31/12/2021, based on 2018, 2019 and 2020 data, with a 79% coverage ratio(weight) in 202 and 85% in 2021. For companies that are not covered, data was estimated assuming that these companies produce similar emissions to those with coverage.

6.4 our environmental footprint

● as a company

The tool built in partnership with I Care & Consult in 2021 has enabled us to track our GHG emissions as a company every year since 2019. The data is shown below in t eq. CO₂, as per the GHG Protocol⁽²⁰⁾.

Period	Scopes 1 & 2	Upstream scope				Total (scopes 1, 2 and upstream scope 3)
		Business travel	Home-work commute	Digital	Purchase of products and various goods	
2019	9	92	4	20	640	765
2020	3	25	2	25	575	630
2021	3	51	6	27	774	861

Purchases still account for most of our carbon footprint, weighing 90% of the footprint in 2021 (compared to 91% in 2020 and 84% in 2019). These mostly involve the purchase of data and financial and extra-financial services, as well as events-related expenditure. Their increase is a direct consequence of our greater need for information and data.

On non-climate issues, we continued to deploy initiatives aimed at reducing our direct impacts, including:

- Continuing with the SHRED-IT recycling programme by collecting 1.31 tons of paper, up 16% compared to 2020 (saving 21 trees from being felled, 26 m² of water and 1.3m³ of oil).
- The recovery of over 21 kg of waste (consumable IT and office supplies) through CONIBI (Consortium dedicated to the recycling of used printing consumable supplies from companies, to ensure they get a second life) a level that is stable compared to last year.
- The recovery of 6 kg in plastic caps and stoppers on behalf Les Bouchons d'amour (a charity proving care and support for the disabled), also stable compared to 2020.

(20) The world's most widely used GHG measurement protocol, also used by the Carbon Disclosure Project and the Science-Based Targets Initiative, cf. <https://ghgprotocol.org/>. The calculation based on the French Carbon Footprint methodology generates almost identical results.

6.4 our environmental footprint

Since 2015, we have chosen to publish the carbon footprint of our funds purely for information purposes. The carbon footprint readings have no direct bearing on our investment decisions. While knowledge of our own carbon footprint as a company is fundamental in enabling us to identify and quantify the available levers for cutting our emissions, the use of the aggregate carbon footprint at portfolio level should be handled with great care, as it raises several questions:

- The complex nature of value chains does not facilitate the measurement of greenhouse gas emissions (GHG) throughout a lifecycle. The carbon footprint of a portfolio is at best partial and includes considerable biases, meaning that this tool is ill-adapted to decision-making. The sector mix within a portfolio also has a major impact on a portfolio's carbon footprint, irrespective of its contribution to climate change.
- Structurally, the carbon footprint does not take into account non-carbon issues, despite the variety and interdependence of environmental issues.
- The calculation methodology - which consists in dividing the known GHG emissions (absolute carbon footprint) by an economic divider (market cap) - accentuates the inadequacy of such a tool for steering or reporting on the absolute GHG emission reductions at an aggregate portfolio level.
- As is also the case with carbon intensity, this ratio (which divides GHG emissions by the company's turnover) is inadequate for defining a decarbonization or alignment strategy for a portfolio, or for identifying key negative environmental impacts, as per national or European requirements or the TCFD and TNFD disclosure recommendations.

For example, every year, the funds that are most aligned with the environmental and climate transition are also those that display the highest weighted carbon footprints, as shown in the table below⁽²²⁾. The record carbon footprint is held by Sycomore Eco Solutions, the only Greenfin-certified fund within our range and the best aligned with the environmental transition; the fund displays the highest NEC of +48% and can boast the strongest climate alignment scores. Yet the fund's carbon footprint is 20 times higher than the footprint of Sycomore Sustainable Tech. **Carbon footprints mostly reflect sector mixes** and we have generally observed declines since 2020, due to the higher value of dividers – as markets rose between 31/12/2020 and 31/12/2021.

Funds	NEC	Average carbon footprint in t eq. CO ₂ /an/€M based on company market cap.
SRI Ageing Population ⁽²³⁾	-1%	61
Sycomore Sustainable Tech	+3%	15
Sycomore Partners	+1%	128
Sycomore Global Education	+3%	60
Sycomore Global Happy@Work	+3%	85
Sycomore Global Happy@Work	+6%	108
SRI European Equity ⁽²³⁾	+7%	96
Sycomore Shared Growth	+4%	110
Sycomore Next Generation	+6%	169
Sycomore Allocation Patrimoine	+4%	232
Sycomore Sélection Crédit	+7%	224
Sycomore Francecap	+2%	227
Sycomore Sélection Responsable	+10%	173
Sycomore Sélection PME	+12%	239
Sycomore Sélection Midcap	+14%	213
Sycomore Inclusive Jobs	+18%	209
Objectif Climat Actions 2	+32%	250
Sycomore Global Éco Solutions`	+35%	120
Sycomore Europe Éco Solutions	+48%	296

(21) Sustainability Financial Disclosure Regulation, SFDR, enforced in March 2021.

(22) Sources: NEC 1.0 calculated by Sycomore AM based on 2018, 2019 and 2020 data, with a 97% coverage (weight), scopes 1,2 and 3 upstream carbon footprint based on Trucost/S&P data with an average coverage of 85% (weight and portfolios) as of 31/12/2021.

(23) Managed by Sycomore AM on behalf of Generali Investments Luxembourg, shown as an example as Sycomore AM does not market this fund in France.

6.4 our environmental footprint

This observation was first made in 2015 and has been further substantiated over the years and endorsed by a growing number of investors, prompting us to emphasize the NEC as our compass to navigate the environmental transition.

In 2021, the NEC of our total assets under management remained **stable at +10% after rising for 3 years**. This is the result of conflicting factors:

- 2 new funds with NECs > +10%: 1 fund applying the NEC as an optional criterion, Sycomore Inclusive Jobs, achieving an average NEC of +18%, and 1 fund using the NEC as a binding criterion, Sycomore Global Éco Solutions, which achieved a NEC of +35%,
- The rising percentage of assets under management that now use the NEC as an outperformance criterion on sustainability issues – often referred to as ESG or extra-financial: 11 funds, accounting for 48% of our net assets,
- These effects are counter-balanced by assets displaying low – but improving NECs (existing funds and two new strategies) and an 8-percentage point drop in the NEC of our largest green fund, Sycomore Europe Éco Solutions, a decline that merely reflects a combination of sector moves and price fluctuations.

On climate-related factors, we rely on our climate toolkit, enhanced in 2021 and summarised below:

			SBTi coverage
Key characteristics	NEC 2020 used as a proxy for the interpolation of the NEC between 2010 and 2050	Calculation over 2010-2050 by a sector expert on the basis of public information	Targets approved by an independent third-party on the basis of future goals on horizons ranging from 2025 to 2050
	Climate component of the NEC weighing around 50% on average	Based on the 2°C scenario of the IPCC and IEA and on the SDA, Sectoral Decarbonization Approach, with additional extrapolations	
			
First take-aways	Metric covering 100% of portfolios and indices; strong correlation with SB2A temperature rise in climate-relevant sectors	Rising coverage >55% for climate-relevant fund; reassuring metric relative to peers	Fast-rising coverage Sector and methodological limitations
Use by Sycomore AM	Contribution to the environmental transition on a scale of -100% to +100%, able to provide an SB2A temperature proxy in °C	Induced temperature rise by 2100 expressed in °C; additional metric to the NEC suggested for climate-relevant funds	Several levels of alignment, to be differentiated from the SB2A-induced temperature rise used on an indicative and complementary basis.

Sources: Sycomore AM analysis, 2022 SB2A, Science Based 2°C Alignment from Iceberg Data Lab, and Science Based targets Initiative, 2022, <https://sciencebasedtargets.org/companies-taking-action>

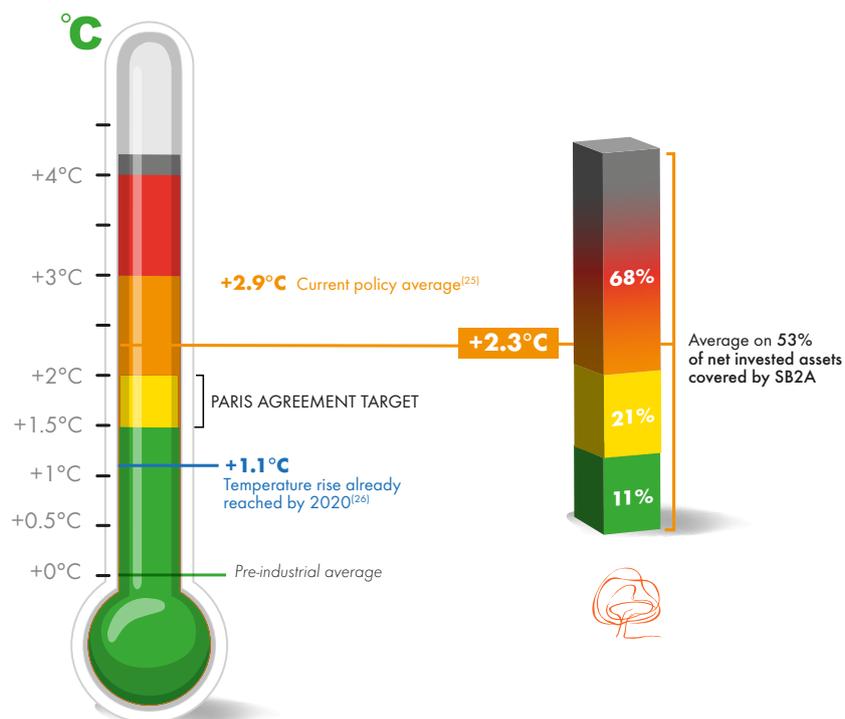
6.4 our environmental footprint

The indicator that is used in addition to the NEC, the SB2A induced temperature rise expressed in °C, has seen vast improvements in terms of its coverage ratio, which has risen from 38% to 53% of net invested assets (equities and bonds) – a 40% increase. The rise in temperature from +2.1°C to +2.3°C can neither confirm nor disprove a drift within our portfolios: the change mainly reflects a shift in the scope that is effectively measured. Finally, the percentage of our net assets invested in companies that have developed SBTi-approved targets has risen substantially to 44%, with 32% aiming for a +1.5°C pathway. Here again, this does not necessarily signal a drift or an improvement in our investments, but results from a large increase in the coverage ratio using a transparent and independent methodology. Finally, the R&D work conducted on a sample of 101 companies and focusing on induced temperatures revealed that:

- Substantial discrepancies exist between the continuous temperature provided by SB2A and the three discreet values supplied by the SBTi approach,
- On average, this gap stands at 0.7°C as the SB2A tends to come up with a higher temperature rise on average, a result that can be viewed as more cautious,
- These gaps vary greatly from one sector to the other, ranging from +2.5°C for airports (SB2A has disclosed a +4.5°C temperature for an airport operator with an SBTi approved target of +2°C) to -1°C for heavy electrical equipment such as turbines for wind farms (aligned with a temperature rise of +1.5°C for SBTi and +0.5°C for SB2A).

To sum up, both are interesting but different and can only provide an indicative and partial addition to the NEC. In no way can the SB2A and SBTi temperature information be aggregated, and the data supplied by SB2A tends to be more conservative for the vast majority of sectors.

aggregate induced temperature rise in 2100 as of 31/12/2021 for net invested assets⁽²⁴⁾



(24) According to the SB2A v1.2 methodology and databases for years 2019, 2020 and 2021.

(25) Average range provided by the Carbon Adia Tracker in 2020.

(26) Source: AR6 report, W61, August 2021.

6.4 our environmental footprint

To summarise, in 2021 we have access to stable indicator – the NEC, one partial and deteriorating source of information, and two data sources that have improved since 2020. The average induced temperature rise for assets managed by Sycomore AM still comes out above +2°C at end 2021. Nevertheless, Sycomore AM's overall alignment with the environmental transition, as measured by the NEC, has increased considerably since 2017 to reach +10% in 2020 and 2021.

Furthermore, **in response to frequent questions on our alignment with the Paris Agreement**, we are able to provide the following quantitative data, notwithstanding specific reservations on the methodologies used and on perimeters that remain insufficient. Net invested assets account for 89% of all AUM at end 2021; we have therefore estimated that the percentage of all AUM aligned with a temperature pathway below +2°C by 2100, compared to the 1850 – 1900 period, lies within the following range:

- **Above 17%**, using the SB2A temperatures that are strictly below +2°C as an indicator for alignment, knowing that within the remaining 83%, 30% are not aligned and 53% are not disclosed,
- **Above 36%**, using the two “well-below 2°C” and “1.50C” SBTi-approved targets as an indicator for alignment, knowing that for the remaining 64%, the information is not available at present.

The large discrepancy between both figures provides further proof that these metrics must be used with care, though we do believe they remain among the most robust in the market. We have shared the information, **for information purposes, as converging signals of a partial alignment**.

The three funds that have placed long-term climate and environmental goals at the very heart of their investment strategies, namely Sycomore Europe Éco Solutions, Sycomore Global Éco Solutions and Objectif Climat Actions 2, weigh close to 11% of Sycomore AM's total AUM at end 2021.



mission committee's **conclusion** on the achievement of statutory objective #1

The measure and improve the environmental and societal contribution of our investments while providing transparency and a learning experience for our clients

The NEC of Sycomore AM's investments was stable in 2021 at +10% with a sharp improvement since 2018, when it came in at +4%. Means have been deployed for improving the measurement of the firm's environmental contribution, including participation in the work conducted by the NEC Initiative and major advancements on measuring the biodiversity footprint.

2021 saw the development of an ambitious roadmap including targets set for 2030 for the NEC with additional objectives on the implied temperature rise, based on SB2A methodology and SBTi coverage.

To meet the target and achieve a NEC of +20% by 2030, the appropriate levers will have to be implemented to ensure that portfolio NECs rise again, after a stable year in 2021.



from independent third-party

audit on the **execution** of social and environmental **objectives**



Rapport de l'organisme tiers indépendant, sur la vérification de l'exécution des objectifs sociaux et environnementaux

SYCOMORE ASSET MANAGEMENT

14 avenue HOICHE
75008 PARIS

Exercice clos le 31 décembre 2021

Aux associés,

En notre qualité d'organisme tiers indépendant (tierce partie), dont la recevabilité opérationnelle a été validée pour la vérification de la qualité de société à mission le 29 juillet 2021, nous avons mené des travaux visant à formuler un avis motivé exprimant une conclusion d'assurance modérée sur l'exécution des objectifs sociaux et environnementaux que votre entité s'est fixée sur le périmètre concerné par la qualité de société à mission telle que présentée dans le rapport du comité de mission et relative à la période allant du 1^{er} janvier 2021 au 31 décembre 2021 joint au rapport de gestion en application des dispositions de l'article L. 210-10 du Code de commerce et de notre programme disponible sur demande.

Conclusion

Sur la base des procédures que nous avons mises en œuvre, telles que décrites dans la partie « Nature et étendue des travaux », et des éléments que nous avons collectés, nous n'avons pas relevé d'anomalie significative de nature à remettre en cause, sur le périmètre concerné par la qualité de société à mission et à la fin de la période couverte par notre vérification :

- le fait que l'entité ait mis en œuvre des moyens adéquats pour une partie des objectifs sociaux et environnementaux retenus, à l'exception de l'objectif "Déployer sa démarche d'achats responsables pour participer à la création d'écosystèmes résilients" en application du 2° de l'article L. 210-10 et inscrit dans

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3, rue Brindejanc des Moulins - 31500 Toulouse
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Cabinet de Saint Front, Cabinet spécialisé en Développement durable
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ses statuts pour lequel les moyens ne sont pas en adéquation avec le résultat défini : "faire vivre la politique d'achats responsables",

- le fait que l'entité ait atteint les résultats qu'elle a définis pour une partie des objectifs sociaux et environnementaux retenus en application du 2° de l'article L. 210-10 et inscrits dans ses statuts, à l'exception des objectifs sociaux et environnementaux "*Déployer sa démarche d'achats responsables pour participer à la création d'écosystèmes résilients*" et "*Créer de la valeur pérenne pour ses actionnaires*", pour lesquels les résultats des objectifs opérationnels respectivement "*Faire vivre la politique d'achats responsables*" d'une part et "*Assurer la représentation de parties prenantes internes et externes au sein du comité de mission*" d'autre part, ne sont pas atteints, et que,
- par conséquent, la société SYCOMORE AM respecte les objectifs sociaux et environnementaux "*Mesurer et améliorer la contribution environnementale et sociétale de ses investissements en assurant transparence et pédagogie pour ses clients*", "*Poursuivre le développement de son offre d'investissement socialement responsable visant à générer des impacts positifs, alliant sens et performance*", "*Offrir à ses collaborateurs un cadre de travail de qualité et les associer aux décisions stratégiques à travers l'actionnariat salarié*" et "*Renforcer sa propre contribution sociétale en partageant une partie de la création de valeur avec des associations, notamment à travers la fondation Sycomore*", qu'elle s'est donné pour mission de poursuivre, en cohérence avec sa raison d'être et son activité au regard de ses enjeux sociaux et environnementaux.
- par conséquent, la société SYCOMORE AM ne respecte pas les objectifs sociaux et environnementaux "*Déployer sa démarche d'achats responsables pour participer à la création d'écosystèmes résilients*" et "*Créer de la valeur pérenne pour ses actionnaires*", qu'elle s'est donné pour mission de poursuivre, en cohérence avec sa raison d'être et son activité au regard de ses enjeux sociaux et environnementaux.

Commentaire :

Sans remettre en cause la conclusion exprimée ci-dessus, nous formulons, les commentaires suivants :

- Concernant l'objectif opérationnel "*Assurer la représentation de parties prenantes internes et externes au sein du comité de mission*", la transition du comité RSE préexistant vers un Comité de mission opérationnel est en cours. Le Comité de mission a précisé que "La composition du comité a évolué ainsi que son mode de fonctionnement et de reporting. Il conviendra de poursuivre les travaux pour assurer la représentation de parties prenantes externes au sein du Comité". Par ailleurs, le Comité de mission est composé uniquement de personnes en charge de l'exécution de la mission. Or le 3° de l'article L210-10 du Code de commerce indique "Ses statuts précisent les modalités du suivi de l'exécution de la mission (...). Ces modalités prévoient qu'un comité de mission, (...), est chargé exclusivement de ce suivi".
- L'objectif statutaire "*Déployer sa démarche d'achats responsables pour participer à la création d'écosystèmes résilients*" est, selon nous, une déclinaison non cohérente de la raison d'être.
- Nous attirons l'attention du lecteur sur l'objectif opérationnel "*Formaliser des objectifs RSE/ISR dans les dispositifs de rémunération des collaborateurs*", pour lequel le Comité de mission a précisé que "des éléments ont été intégrés aux feuilles de route individuelles. Néanmoins il conviendra de préciser les objectifs extra-financiers des différentes équipes, en particulier à la gestion".

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Préparation de l'information liée à l'exécution des objectifs sociaux et environnementaux

L'absence de cadre de référence généralement accepté et communément utilisé ou de pratiques établies sur lequel s'appuyer pour évaluer et mesurer les informations portant sur les objectifs sociaux et environnementaux permet d'utiliser des techniques de mesure différentes, mais acceptables, pouvant affecter la comparabilité entre les entités et dans le temps.

Par conséquent, les informations liées à l'exécution des objectifs sociaux et environnementaux doivent être lues et comprises en se référant au rapport de mission.

Responsabilité de l'entité

Il appartient à l'entité de désigner un comité de mission chargé d'établir annuellement un rapport en application des dispositions de l'article L. 210-10 du Code de commerce. Ce rapport est joint au rapport de gestion.

Responsabilité de l'organisme tiers indépendant

En application des dispositions de l'article R. 210-21 du Code de commerce, il nous appartient, sur la base de nos travaux, de formuler un avis motivé exprimant une conclusion d'assurance modérée sur le respect par l'entité des objectifs sociaux et environnementaux qu'elle s'est fixés sur le périmètre concerné par la qualité de société à mission.

N'ayant pas été impliqués dans la préparation de l'information liée à l'exécution des objectifs sociaux et environnementaux, nous sommes en mesure de formuler une conclusion indépendante d'assurance modérée sur ladite information.

Dispositions réglementaires et doctrine professionnelle applicable

Nos travaux décrits ci-après ont été effectués conformément aux dispositions de l'article R. 210-21 du Code de commerce et de la norme ISO 17029.

Indépendance et contrôle qualité

Notre indépendance est définie par les dispositions prévues à l'article L. 822-11-3 du Code de commerce. Par ailleurs, nous avons mis en place un système de contrôle qualité qui comprend des politiques et des procédures documentées visant à assurer le respect des textes légaux et réglementaires applicables. Nous appliquons un programme disponible sur demande.

Moyens et ressources

Nos travaux ont mobilisé les compétences de 4 personnes et se sont déroulés entre février et avril sur une durée totale d'intervention de 3 mois.

Nous avons mené 11 entretiens.

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Nature et étendue des travaux

Nous avons planifié et effectué nos travaux en prenant en compte le risque d'anomalies significatives.

Les procédures que nous avons menées en exerçant notre jugement professionnel nous permettent de formuler une conclusion d'assurance modérée.

Nous avons pris connaissance des activités de l'entité sur le périmètre concerné par la qualité de société à mission, de la formulation de sa raison d'être ainsi que ses enjeux sociaux et environnementaux.

Nos travaux ont porté sur :

- d'une part, la cohérence des objectifs sociaux et environnementaux retenus en application du 2° de l'article L. 210-10 et inscrits dans ses statuts, de la raison d'être de l'entité précisés dans ses statuts (ci-après « raison d'être ») et de son activité au regard de ses enjeux sociaux et environnementaux ;
- d'autre part, l'exécution de ces objectifs.

Concernant la cohérence des objectifs, de la raison d'être et de l'activité de l'entité au regard de ses enjeux sociaux et environnementaux :

- Nous avons conduit des entretiens destinés à apprécier l'engagement de la direction et des membres de la gouvernance au regard des attentes des principales parties prenantes internes ou externes concernées par l'activité de la société.
- Nous avons apprécié les processus mis en place pour structurer et formaliser cette démarche en nous appuyant sur :
 - l'ensemble des informations disponibles dans l'entité (par exemple, procès-verbaux des réunions du conseil, échanges avec le comité social et économique, comptes rendus ou support des réunions avec des parties prenantes internes ou externes, analyses des risques) ;
 - la feuille de route de société à mission et le dernier rapport de mission établi depuis la dernière vérification ;
 - le cas échéant, ses publications (par exemple, plaquette commerciale, rapport de gestion, rapport intégré, DPEF, sur le site internet).
- Nous avons ainsi apprécié, compte tenu de l'activité de la société au regard de ses enjeux sociaux et environnementaux, la cohérence entre :
 - les informations collectées ;
 - la raison d'être et
 - les objectifs sociaux et environnementaux formulés dans les statuts.

Concernant l'exécution des objectifs sociaux et environnementaux, nous nous sommes enquis de l'existence de moyens, d'actions, de la mesure de résultats (données historiques qualitatives ou quantitatives sous forme d'objectifs opérationnels ou d'indicateurs clés de suivi) atteints par la société à la fin de la période couverte par la vérification pour chaque objectif social et environnemental au regard des trajectoires établies par la société.

Pour ce faire, nous avons réalisé les diligences suivantes :

- nous avons pris connaissance des documents établis par l'entité pour rendre compte de l'exercice de sa mission, notamment les dispositions précisant les résultats et les modalités de suivi qui y sont associées, ainsi que le rapport de mission ;

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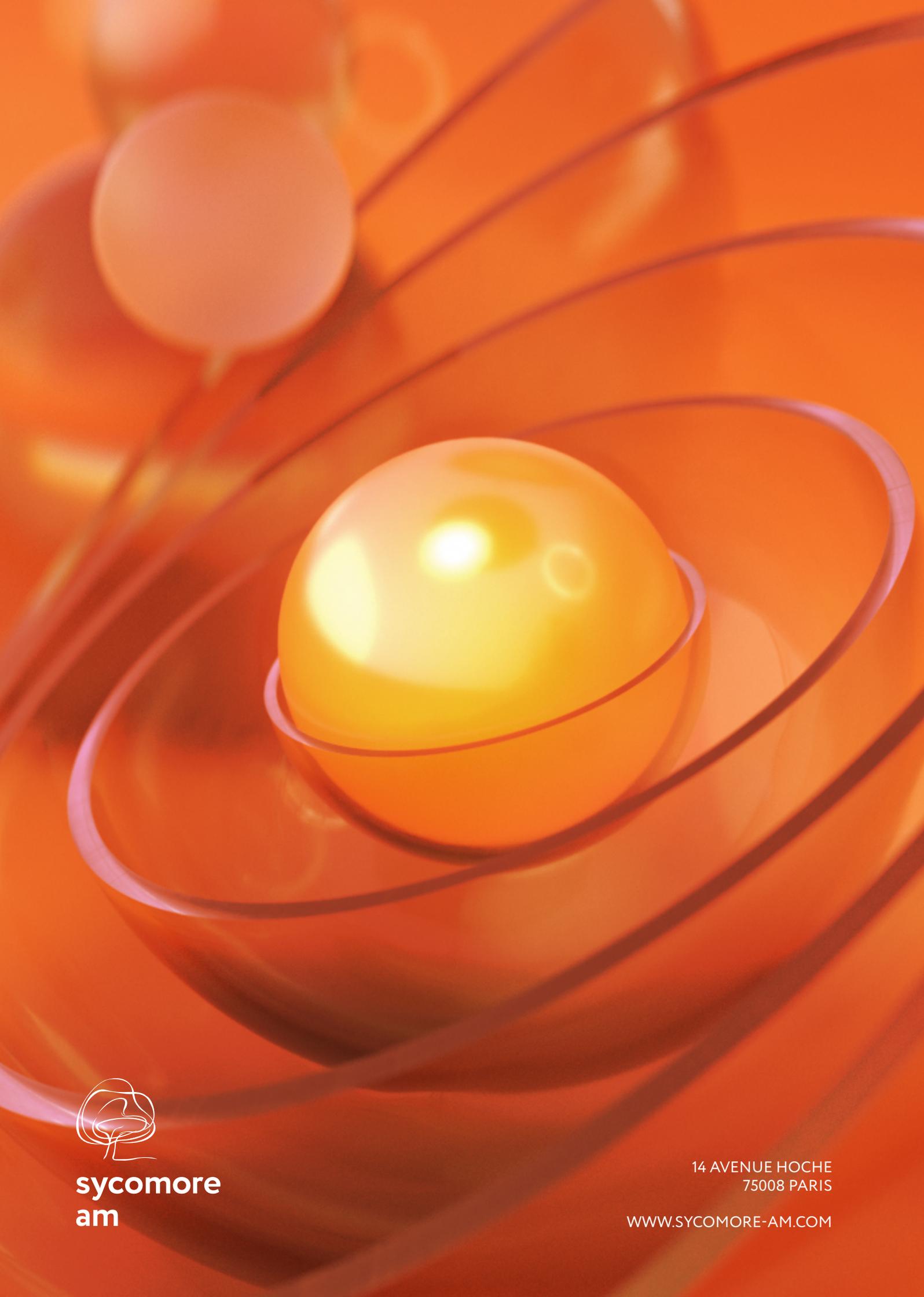
- nous nous sommes enquis de l'appréciation de l'exécution des objectifs sociaux et environnementaux auprès du comité de mission et avons corroboré l'information collectée avec la perception qu'ont les parties prenantes des effets et impacts de l'entité. Par ailleurs, nous nous sommes enquis de l'analyse dans le rapport de mission, des résultats atteints par la société à la fin de la période couverte par la vérification au regard de leurs trajectoires attendues, de la réalisation des actions prévues pour permettre d'apprécier le niveau d'avancement des objectifs sociaux et environnementaux ;
- nous nous sommes enquis auprès de la direction générale de l'entité des actions menées, des moyens financiers et non financiers affectés pour le respect des objectifs sociaux et environnementaux ;
- nous avons vérifié la présence de résultats aptes à démontrer le positionnement sur les trajectoires définies ;
- nous avons apprécié l'adéquation des moyens mis en œuvre visant au respect des résultats, par rapport à leurs trajectoires, au respect des actions prévues, au regard de l'évolution des affaires sur la période ;
- nous avons vérifié la sincérité de l'ensemble de ces indicateurs et, notamment nous avons :
 - vérifié que les indicateurs couvrent l'ensemble du périmètre concerné par la qualité de société à mission ;
 - mis en œuvre des contrôles consistant à vérifier la correcte consolidation des données collectées ainsi que la cohérence de leurs évolutions ;
 - mis en œuvre des tests de détail sur la base de sondages, consistant à vérifier la correcte application des définitions et procédures et à rapprocher les données des pièces justificatives ;
 - apprécié la cohérence d'ensemble du ou des rapports de mission au regard de notre connaissance de l'entité et du périmètre concerné par la qualité de société à mission.

Les procédures mises en œuvre dans le cadre d'une assurance modérée sont moins étendues que celles requises pour une assurance raisonnable effectuée selon les normes d'exercice professionnel applicables en France ; une assurance de niveau supérieur aurait nécessité des travaux de vérification plus étendus.

Fait à Toulouse, le 14 avril 2022

L'ORGANISME TIERS INDEPENDANT
SAS CABINET DE SAINT FRONT

Candice Lourdin
Directrice générale



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am

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