

# SFDR PAI Statement

## AXA IM Deutschland GmbH

[LEI: 2138008Q2ZUL58MR3R34]



## Summary

AXA IM Deutschland GmbH [LEI: 2138008Q2ZUL58MR3R34] considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated statement on principal adverse impacts on sustainability factors of AXA IM Deutschland GmbH.

This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January to 31 December 2022.

The principle adverse impacts are described in the AXA IM Sustainable Finance Disclosure Statement (see Section II regarding AXA IM approach to consider adverse sustainability impacts, and Appendix 1 regarding consideration of PAI at both entity and product levels) and measured below. More details are available on AXA IM website (see “SFDR entity disclosure”): <https://www.axa-im.com/important-information/sfdr>

## Übersicht

*AXA IM Deutschland GmbH [LEI: 2138008Q2ZUL58MR3R34] berücksichtigt die wesentlichen negativen Auswirkungen ihrer Anlageentscheidungen auf Nachhaltigkeitsfaktoren. Die vorliegende Erklärung ist die konsolidierte Erklärung zu den wichtigsten negativen Auswirkungen auf Nachhaltigkeitsfaktoren der AXA IM Deutschland GmbH.*

*Diese Erklärung zu den wichtigsten negativen Auswirkungen auf die Nachhaltigkeitsfaktoren bezieht sich auf den Bezugszeitraum vom 1. Januar bis zum 31. Dezember 2022.*

*Die wichtigsten negativen Auswirkungen werden in der Offenlegungserklärung von AXA IM zu nachhaltigen Finanzprodukten beschrieben (siehe Abschnitt II über den Ansatz von AXA IM zur Berücksichtigung negativer Nachhaltigkeitsauswirkungen und Anhang 1 über die Berücksichtigung von PAI sowohl auf Unternehmens- als auch auf Produktebene) und im Folgenden gemessen. Weitere Einzelheiten sind auf der Website von AXA IM zu finden: <https://www.axa-im.com/important-information/sfdr>*

## Description of the principal adverse impacts on sustainability factors

### *Methodological approach*

Figures disclosed in this report can either be based on “**all investments**” as defined by the regulation, or on “**eligible assets**”. For the purpose of this report, eligible assets refers to all investments (*i.e.*, investee companies, or sovereign and supranational, or real estate assets, depending on the PAI), excluding derivatives, cash and cash equivalent. In the event of insufficient data and/or low data quality for a specific investment, such investment has been excluded from the basis of calculation for the relevant indicator. Such exclusion is reflected and disclosed through the coverage ratio for the relevant indicator. The coverage disclosed in this report reflects the proportion of eligible assets for which data is available and provided in this report.

For real estate, indicators apply to all standing real estate assets owned during the full year of reporting (*i.e.*, excluding (i) irrelevant assets (parking, land, cellars, etc.), (ii) assets under development and (iii) assets managed by third-party asset managers).

Reported PAI indicators based on all investments, excluding eligible assets with no available data	Reported PAI indicators based on eligible assets, excluding eligible assets with no available data
PAI 2, 4, 7, 8, 9, 10, 11, 14, 16, 17 and 18, and additional social PAI 15	PAI 1, 3, 5, 6, 12, 13 and 15, and additional environmental PAI 6 and 18

### *Data sources*

For PAI computation, we rely on S&P Global Trucost for traditional asset classes (*i.e.*, fixed income and listed equity), on FinDox for leveraged loans, on S&P Global Trucost, MSCI Carbon Delta, and Bloomberg for other alternative asset classes (*e.g.*, asset-backed securities, insurance-linked securities, and RegCap), and on Iceberg Data Lab for real estate assets – unless specified differently in the “Explanation” column.

Indicators applicable to investments in investee companies <sup>1</sup>						
Adverse sustainability indicator	Metric	Impact [2022] <sup>2</sup>	Impact [2021]	Explanation	Actions taken, and actions planned and targets set for the next reference period	
<b>Climate and other environment-related indicators</b>						
<b>Greenhouse gas emissions</b>	1. GHG emissions	Scope 1 GHG emissions (tCO <sub>2</sub> eq)	<b>694 916</b>	n/a	<b>Data coverage on eligible assets<sup>3</sup>:</b> 58%	<p>AXA IM is committed to achieving net zero emissions across our portfolios by 2050 or sooner, as well as playing a key role in helping our clients better understand climate change and how it may impact their portfolios and supporting them in adapting their investment decisions accordingly. AXA IM published its first Net Zero target in October 2021, as part of the first NZAMi progress report, committing to apply net zero approaches on 15% of its AUMs. This target was subsequently revised in April 2022, to cover 65% of the AuM. Accordingly, we have developed a net zero framework on applied to traditional asset classes and real estate assets which follows industry standards considering internal and external information to determine the net zero profile of companies.</p> <p>Overall, for all traditional asset classes, AXA IM monitors on an annual basis at minimum the GHG emissions of its worldwide holdings, as well as a selection of other climate-related indicators depending on the asset class.</p> <p>Over the years, we also have implemented:</p> <ul style="list-style-type: none"> <li>- exclusion criteria on the energy sector as part of our Climate Risks policy;</li> <li>- specific engagement on climate transition;</li> <li>- specific low-carbon, carbon transition and carbon offset strategies at fund-level.</li> </ul> <p>For more details, see <b>Appendix 1 of AXA IM Sustainable Finance Disclosure Statement</b> related to consideration of PAI at both</p>
		Scope 2 GHG emissions (tCO <sub>2</sub> eq)	<b>210 673</b>	n/a	<b>Data coverage on eligible assets:</b> 58%	
		Scope 3 GHG emissions (tCO <sub>2</sub> eq)	<b>6 729 317</b>	n/a	<b>Data coverage on eligible assets:</b> 53%	
		Total GHG emissions (tCO <sub>2</sub> eq)	<b>7 587 328</b>	n/a	<b>Data coverage on eligible assets:</b> 53% The reported coverage accounts for assets reporting on both Scope 1 + 2 + 3 separately (not only on any of the 3 scopes).	
	2. Carbon footprint	Carbon footprint (tCO <sub>2</sub> eq/€M)	<b>394</b>	n/a	<b>Data coverage on eligible assets:</b> 53% Reported impacts should be viewed in the context of a comprehensive coverage of Scope 3 emissions (both on upstream and on downstream GHG emissions, and across all Scope 3 categories), as reported on PAI1.	
	3. GHG intensity of investee companies	GHG intensity of investee companies (tCO <sub>2</sub> eq/€M)	<b>1 200</b>	n/a	<b>Data coverage on eligible assets:</b> 53% Reported impacts should be viewed in the context of a comprehensive coverage of Scope 3 emissions (both on upstream and on downstream GHG emissions, and across all Scope 3 categories), as reported on PAI1.	

<sup>1</sup> Please note that these indicators only apply to corporate assets, representing 74% (€36.5bn) of the AuM managed by AXA IM Deutschland as at 31 December 2022: 68% from AXA IM Core (traditional asset classes), 6% from AXA IM Alts (Alternative credit, Natural capital & Impact).

<sup>2</sup> Impact as at 31/12/2022. For 2022 reporting, AXA IM Deutschland is not in position to report average of impacts for 31 March, 30 June, 30 September, and 31 December 2022. Please refer to important notice at the end of this report.

<sup>3</sup> The coverage disclosed in this report reflects the proportion of eligible assets for which data is available and provided in this report. Eligible assets refer to all investments (*i.e.*, investee companies, or sovereign and supranational, or real estate assets, depending on the PAI), excluding derivatives, cash and cash equivalent. Please refer to important notice at the end of this report.

	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector (%)	<b>4.15</b>	n/a	<b>Data coverage on eligible assets:</b> 59%	entity and product levels. AXA IM Sustainable Finance Disclosure Statement is available on AXA IM website (see “SFDR entity disclosure”): <a href="https://www.axa-im.com/important-information/sfdr">https://www.axa-im.com/important-information/sfdr</a>
	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources (%)	<b>56.13</b>	n/a	<b>Data coverage on eligible assets:</b> 66%	
	6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector (GWh/€M)	<b>A: 0.10</b> <b>B: 1.05</b> <b>C: 0.61</b> <b>D: 4.90</b> <b>E: 1.84</b> <b>F: 0.26</b> <b>G: 0.14</b> <b>H: 0.97</b> <b>L: 0.17</b>	n/a	<b>Data coverage on eligible assets:</b> - Sector A: 13% - Sector B: 90% - Sector C : 92% - Sector D : 99% (as noted above, PAI data was primarily sourced via a data provider. However, for NACE sector D, it relied on data directly obtained from investee companies for one investee company) - Sector E: 87% - Sector F: 58% - Sector G : 87% - Sector H : 96% - Sector L : 95%  Data coverage on eligible is here the coverage on each NACE sector.	
<b>Biodiversity</b>	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas (%)	<b>4.65</b>	n/a	<b>Data coverage on eligible assets:</b> 2%  Reported impacts are still pending methodological harmonization across third-party data providers as current methodologies to account for PAI7 vary depending on the providers. Therefore, and as our coverage on this PAI is currently very low, reported impacts on PAI7 should be regarded cautiously.	AXA IM have strengthened its strategy to better integrate the challenges relating to biodiversity protection in our investment process, fundamental research and our engagement strategy. We now report on our biodiversity footprint which represents an aggregation of various PAI, i.e., the pressures on ecosystems generated by human activities, among them: water and air pollution; land artificialization, exploitation and pollution; and climate change.
<b>Water</b>	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average (t/€M)	<b>0.02</b>	n/a	<b>Data coverage on eligible assets:</b> 12%  Reported impacts are still pending methodological harmonization across	In the past years, we also have implemented: - exclusion criteria on sector related to deforestation as part of our Ecosystem protection & Deforestation policy; - specific engagement on biodiversity;



					third-party data providers as current methodologies to account for PAI8 vary depending on the providers.	- specific biodiversity, plastic & waste transition at fund-level. For more details, see <b>Appendix 1 of AXA IM Sustainable Finance Disclosure Statement</b> related to consideration of PAI at both entity and product levels. AXA IM Sustainable Finance Disclosure Statement is available on AXA IM website (see “SFDR entity disclosure”): <a href="https://www.axa-im.com/important-information/sfdr">https://www.axa-im.com/important-information/sfdr</a>
<b>Waste</b>	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average (t/€M)	<b>2.17</b>	n/a	<b>Data coverage on eligible assets:</b> 26% Reported impacts are still pending methodological harmonization across third-party data providers as current methodologies to account for PAI9 vary depending on the providers.	
<b>Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters</b>						
<b>Social and employee matters</b>	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises (%)	<b>0.09</b>	n/a	<b>Data coverage on eligible assets:</b> 100% Reported data are based on data provided by Sustainalytics as for companies assessed as being “non-compliant” with the UNGC, OECD guidelines for MNE, ILO Conventions or UNGP for Business and Human Rights, completed by internal AXA IM assessment which applies to all AXA IM Paris assets: as part for AXA IM ESG Standards policy, AXA IM may override Sustainalytics’ assessment regarding violations of international norms and standards, based on a qualitative analysis.	As part of our ESG Standards policy <sup>4</sup> , since 2021, we avoid investing in companies which cause, contribute or are linked to violations of international norms and standards in a material manner, focusing in particular on UN’s Global Compact Principles, International Labor Organization’s (ILO) Conventions, OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights (UNGPs).  For more details, see <b>Appendix 1 of AXA IM Sustainable Finance Disclosure Statement</b> related to consideration of PAI at both entity and product levels. AXA IM Sustainable Finance Disclosure Statement is available on AXA IM website (see “SFDR entity disclosure”): <a href="https://www.axa-im.com/important-information/sfdr">https://www.axa-im.com/important-information/sfdr</a>
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises (%)	<b>3.07</b>	n/a	<b>Data coverage on eligible assets:</b> 55%	
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies (%)	<b>15.25</b>	n/a	<b>Data coverage on eligible assets:</b> 50%	AXA IM has included gender diversity criteria in its voting policy since 2020. In line with the French Rixain Law, we have

<sup>4</sup> AXA IM ESG Standards policy apply to i) all AXA IM ESG and Responsible Investment (RI) open-ended funds, which include all funds classified as Art.8 or Art.9 under SFDR and ii) on an opt-in basis, any other dedicated fund and mandate under AXA IM management.

	13. Board gender diversity	Average ratio of female board members in investee companies, expressed as a percentage of all board members (%)	35.28	n/a	<b>Data coverage on eligible assets:</b> 59%	<p>committed to improving the representation of women among those making investment decisions from 20% to 25% by 2030.</p> <p>As part of our engagement strategy, since 2021, we deploy a systemic voting criterion linked with board gender diversity: a 33% diversity target for OECD countries, and with targeted companies in emerging markets on gender diversity issues.</p> <p>For more details, see <b>Appendix 1</b> of <b>AXA IM Sustainable Finance Disclosure Statement</b> related to consideration of PAI at both entity and product levels. AXA IM Sustainable Finance Disclosure Statement is available on AXA IM website (see "SFDR entity disclosure"): <a href="https://www.axa-im.com/important-information/sfdr">https://www.axa-im.com/important-information/sfdr</a></p>
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons (%)	0	n/a	<p><b>Data coverage on eligible assets:</b> 100%</p> <p>Reported data and coverage are not based on data provided by third parties but rather on the implementation of AXA IM Controversial weapons policy which applies to all AXA Funds Management assets.</p>	<p>As part of our Controversial weapons policy, we avoid investing in controversial weapons regulated by international conventions, i.e., anti-personnel landmines, cluster munitions, chemical, biological and nuclear weapons.</p> <p>For more details, see <b>Appendix 1</b> of <b>AXA IM Sustainable Finance Disclosure Statement</b> related to consideration of PAI at both entity and product levels. AXA IM Sustainable Finance Disclosure Statement is available on AXA IM website (see "SFDR entity disclosure"): <a href="https://www.axa-im.com/important-information/sfdr">https://www.axa-im.com/important-information/sfdr</a></p>
<b>Indicators applicable to investments in sovereigns and supranationals<sup>5</sup></b>						
	<b>Adverse sustainability indicator</b>	<b>Metric</b>	<b>Impact [2022]</b>	<b>Impact [2021]</b>	<b>Explanation</b>	<b>Actions taken, and actions planned and targets set for the next reference period</b>
<b>Environmental</b>	15. GHG intensity	GHG intensity of investee countries (tCO <sub>2</sub> e/€M)	450	n/a	<p><b>Data coverage on eligible assets:</b> 81%</p> <p>Both territorial and imports emissions are included.</p>	<p>AXA IM has defined a specific climate target for sovereign assets, following the Net Zero Investment Framework (NZIF) target setting guidance and the guidance by UN-led ASCOR project, which consists in beating our main global benchmark on the GermanWatch's Climate Change Performance Index (CCPI) weighted average score.</p> <p>Involvement with policymakers and industry groups is also a key part of our active ownership and stewardship strategy.</p> <p>For more details, see Appendix 1 of AXA IM Sustainable Finance Disclosure Statement related to consideration of PAI at both</p>

<sup>5</sup> Please note that these indicators only apply to sovereign and supranationals assets, representing 18% (€14.5bn) of the AuM managed by AXA IM Deutschland as at 31 December 2022.

						entity and product levels. AXA IM Sustainable Finance Disclosure Statement is available on AXA IM website (see “SFDR entity disclosure”): <a href="https://www.axa-im.com/important-information/sfdr">https://www.axa-im.com/important-information/sfdr</a>
<b>Social</b>	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	<b>1 country; 1.37% of all investee countries</b>	n/a	<b>Data coverage on eligible assets:</b> 81%	As part of our ESG standards policy, we avoid investing in countries with severe human rights violations.  For more details, see Appendix 1 of AXA IM Sustainable Finance Disclosure Statement related to consideration of PAI at both entity and product levels. AXA IM Sustainable Finance Disclosure Statement is available on AXA IM website (see “SFDR entity disclosure”): <a href="https://www.axa-im.com/important-information/sfdr">https://www.axa-im.com/important-information/sfdr</a>
<b>Indicators applicable to investments in real estate assets<sup>6</sup></b>						
Adverse sustainability indicator		Metric	Impact [2022]	Impact [2021]	Explanation	Actions taken, and actions planned and targets set for the next reference period
<b>Fossil fuels</b>	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels (%)	<b>0.00</b>	n/a	<b>Data coverage on eligible assets:</b> 80%	Same as PAI 1 to 6
<b>Energy efficiency</b>	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets (%)	<b>10.85</b>	n/a	<b>Data coverage on eligible assets:</b> 35%  In Germany non-residential buildings do not have energy band thresholds with letter scales. The scale is continuous rather than graduated, making it difficult to position the bands on (a proportional scale is applied that indicates the building’s energy performance in comparison to a reference building). Due to this reason, the coverage displayed is only on the residential part of the portfolio which has energy performance certificates (EPCs) that allow a classification based on the letter bands.	

<sup>6</sup> Please note that these indicators only apply to real estate assets, representing 11% (€9bn) of the AuM managed by AXA IM Deutschland as at 31 December 2022.



Other indicators for principal adverse impacts on sustainability factors						
Additional climate and other environment-related indicators						
Adverse sustainability indicator		Metric	Impact [2022]	Impact [2021]	Explanation	Actions taken, and actions planned and targets set for the next reference period
Water, waste and material emissions	6. Water usage and recycling <sup>7</sup>	1. Average amount of water consumed by the investee companies (in cubic meters) per million EUR of revenue of investee companies (m <sup>3</sup> /€M)	8 713	n/a	<u>Data coverage on eligible assets:</u> 56%	Water consumption & stress is a key pillar of the ESG scoring methodology used for traditional asset classes.
	GHG emissions	18. GHG emissions (kgCO <sub>2</sub> eq) <sup>8</sup>	Scope 1 GHG emissions generated by real estate assets (tCO <sub>2</sub> eq)	1 711	n/a	
Scope 2 GHG emissions generated by real estate assets (tCO <sub>2</sub> eq)			14 572	n/a	<u>Data coverage on eligible assets:</u> 64% Scope 2 emissions are actual data based on real energy consumption data directly collected for our direct property portfolios.	
Scope 3 GHG emissions generated by real estate assets (tCO <sub>2</sub> eq)			15 939	n/a	<u>Data coverage on eligible assets:</u> 30% Scope 3 emissions are actual data based on real energy consumption data directly collected for our direct property portfolios.	
Total GHG emissions generated by real estate assets (tCO <sub>2</sub> eq)			32 222	n/a	<u>Data coverage on eligible assets:</u> 86% Scope 1 and 2 are capturing emissions attributable to the landlord of each asset (i.e., common area of the building), while scope 3 captures emissions attributable to the tenants. Contrary to PAI 1 which accounts for assets reporting on both Scope 1 + 2 + 3 separately, the reported coverage	

<sup>7</sup> Please note that this indicator only apply to listed corporate assets, representing 44% (€36.5bn) of the AuM managed by AXA IM Deutschland as at 31 December 2022.

<sup>8</sup> Please note that these indicators only apply to real estate assets, representing 11% (€9bn) of the total AuM managed by AXA IM Deutschland as at 31 December 2022.

Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters					
Adverse sustainability indicator	Metric	Impact [2022]	Impact [2021]	Explanation	Actions taken, and actions planned and targets set for the next reference period
Anti-corruption and anti-bribery	15. Lack of anti-corruption and anti-bribery policies <sup>9</sup>	Share of investments in entities without policies on anti-corruption and anti-bribery consistent with the United Nations Convention against Corruption (%)	6.33	n/a	<p>accounts for assets reporting on any of the 3 scopes.</p> <p>As part of our ESG Standards policy, we avoid investing in companies involved in incidents and events that pose a severe business or reputation risk to a company due to the impact on stakeholders or the environment, which can include corruption and bribery.</p> <p>For more details, see <b>Appendix 1</b> of <b>AXA IM Sustainable Finance Disclosure Statement</b> related to consideration of PAI at both entity and product levels. AXA IM Sustainable Finance Disclosure Statement is available on AXA IM website (see "SFDR entity disclosure"): <a href="https://www.axa-im.com/important-information/sfdr">https://www.axa-im.com/important-information/sfdr</a></p>

### Description of policies to identify and prioritise principal adverse impacts on sustainability factors

Policies related to actions taken, and actions planned and targets set for the next reference period, and described in Appendix 1 of AXA IM Sustainable Finance Disclosure Statement related to consideration of PAI at both entity and product levels, have been approved the relevant governing bodies in a continuous manner in the previous years. The relevant governing bodies are described in sub-section "Governance & committees" of section I regarding AXA IM approach to integrate sustainability risks.

Methodologies and data sources to select, identify and assess the PAI are mentioned in sub-section 1. "Identification and prioritisation of PAI" of Section II of AXA IM Sustainable Finance Disclosure Statement. AXA IM Sustainable Finance Disclosure Statement is available on AXA IM website: <https://www.axa-im.com/important-information/sfdr>

To report on margin of errors within the methodologies, we report in the present statement the data coverage for each PAI, with subsequent explanations regarding data quality in footnotes when relevant.

### Engagement policies

<sup>9</sup> Please note that this indicator only apply to listed corporate assets, representing 44% (€36.5bn) of the AuM managed by AXA IM Deutschland as at 31 December 2022.

AXA IM has adopted a global engagement policy where we seek to improve issuers' practices with a specific objective in mind, on behalf of our equity and bond holdings. AXA IM's Engagement Policy describes AXA IM engagement process with corporates and governments, individually and as part of collaborative initiatives. The policy is available on AXA IM's website: <https://www.axa-im.com/championing-sustainability/stewardship-and-engagement>

As for our engagement with corporates as follows:

1. Selection of priorities: We engage companies across our ESG thematic in a constructive manner with identified and achievable goals. We challenge companies on their strategy and risks, financial and non-financial performance, and their commitments to strong environmental, social, and governance philosophies;
2. Engagement priorities : sustainability dialogue (dialogue conducted with investee companies around their sustainability practices) is key in establishing and developing a constructive relationship with the company, as well as gaining insights its policies and practices. In the case of engagement with objectives, which seek to influence change at investee companies, we define targeted objectives related to the key ESG with clear targets, and the timeframe we consider appropriate to see progress depending on the nature of the objectives. This engagement policy, combined with our Corporate Governance and Voting policy, allows AXA IM to consider adverse impacts;
3. Governance of the engagement process : For engagement with objectives, we share these objectives with investee companies at the outset of the engagement, and systematically track and record the progress of engagement as described below. While our belief is that long-running confidential and constructive discussions based on trust is often the most effective way to create change over time, we also value transparency and may communicate externally on our engagement activities in selected cases;
4. Tracking, escalation and conclusion of the engagement: Each and every time an interaction with a company is logged, an engagement report is uploaded and made visible to all AXA IM investment platforms. Escalation of the discussion through other means and/or at other levels of the hierarchy are options we can utilise in order to progress on our engagement asks. An escalation strategy is therefore determined for every engagement activity.

More details on our engagement policy are available in sub-section 3 "Engagement policy" on Section II regarding AXA IM approach to consider adverse sustainability impacts of AXA IM Sustainable Finance Disclosure Statement. AXA IM Sustainable Finance Disclosure Statement is available on AXA IM website: <https://www.axa-im.com/important-information/sfdr>

## References to international standards

AXA IM seeks to comply and adhere to various principles, standards, and codes, considered best practices in the market, which govern our policies and practices. AXA IM is signatory of the following codes:

- Principles for Responsible Investment , since May 2007;
- Japanese Stewardship code, since 2014;
- UK Stewardship code, since 2010 (and of the revised code in 2020);
- Task Force on Climate-Related Financial Disclosure (TCFD), since 2017.

As part of the AXA Group, which is signatory of the United Nations Global Compact, AXA IM follows these principles as part of its RI policy.

More details on our adherence to responsible business codes & internationally recognised standards in the dedicated sub-section on Section II regarding AXA IM approach to consider adverse sustainability impacts of AXA IM Sustainable Finance Disclosure Statement. AXA IM Sustainable Finance Disclosure Statement is available on AXA IM website: <https://www.axa-im.com/important-information/sfdr>

### **Historical comparison**

Historical comparison against the previous reported periods will be made starting 2024.

**IMPORTANT NOTICE**

Reporting on certain PAI indicators may be limited, notably in terms of coverage across the asset classes we manage or may reflect reporting periods prior to 2022 due to lack of data availability for 2022. Not all companies and counterparties currently report on all sustainability factors and the report relies on the data available at the moment, disclosed on an annual basis, which might be sourced through third party data providers. Therefore, the data contained herein may prove to be incorrect or incomplete and possible data discrepancies may occur (in particular regarding data provided by third parties). AXA IM Deutschland may change its third-party data provider at any time and at its own discretion, which may also result in changes in relation to the data and or methodologies used for the same instruments or investments in future reports.

For certain indicators, AXA IM Deutschland has made its best effort to request and collect such data from investee companies and/or third-party data provider but was unable to measure or estimate with sufficient comfort the PAI indicator due to (i) a lack of homogenous data disclosure from the investee companies, and/or (ii) poor quality of the data provided by third party data providers and/or unavailability of relevant proxy data from third party data providers. As third-party data providers methodologies will improve in the coming years, AXA IM Deutschland intends to reassess data quality to be able to report on such PAIs in the future.

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