

SUSTAINABILITY REPORT 2021

Disclosures concerning the manner in which Environment, Social and Governance (ESG) criteria are incorporated into investment policy and the resources invested in the energy and ecological transition, pursuant to Article L.533-22-1 of the French Monetary and Financial Code (Code monétaire et financier).



Résidence VILLA LICIAS à Lisses (91)

AMPERE Gestion

Key figures and highlights:

In 2021, AMPERE Gestion continued to set up and manage residential funds covering all residential asset categories, namely:

- emergency accommodation facilities to provide shelter for the least well off;
- intermediate housing to supply new housing at below market rents in the most supply-constrained areas;
- quality and sustainable affordable housing;
- managed student residences close to universities and schools;
- managed residences for seniors with reduced autonomy; and
- medical social services facilities.

As of 31 December 2021, cumulative investment capacity amounted to €11,805 million. Nearly 32,200 units of housing have been contractualised, including approximately 4,000 units of emergency accommodation, 17,000 intermediate housing units, 8,500 units of open market housing and 2,700 units in managed residences and medical social services facilities. Over 21,000 of these units have now been delivered and are in service.

Two new funds were also created in 2021:

- **Lamartine**, a French residential fund with a portfolio comprising over 7,600 housing units. The fund is 85%-owned by CNP Assurances since 4 March 2022 and CDC Habitat holds the remaining 15%. CNP was chosen as investor following a competitive bidding process involving some thirty French and foreign investors. The fund was set up by AMPERE Gestion which is also fund manager. The portfolio offers investment opportunities in some of France's most supply-constrained property markets: 50% of the housing units are located in the Paris region near key transport hubs and the rest are located in France's biggest cities. More than half of the programmes comprise new buildings that meet the latest building standards. The portfolio was put together based on the most rigorous social and environmental criteria: excellent environmental and energy performance; affordable rents based on intermediate housing (30% of the portfolio) and open market housing with adapted rents;
- **Hab'Initio**, a €250 million fund set up to finance land conversion and joint residential programmes. Like all funds managed by AMPERE Gestion, Hab'Initio forms part of a responsible investment approach underpinned by strict environmental and social criteria, mainstreaming of climate risk and biodiversity metrics and certification under French RT 2020 energy performance regulations. The fund closed in early 2022.

For all funds under management and in the process of being set up, AMPERE Gestion deploys an ambitious SRI policy by incorporating environment, social and governance criteria into fund investment and management strategy¹. At 31 December 2021, 95% of assets under management include ESG criteria within their investment and management processes. In 2020, AMPERE Gestion obtained the French Socially Responsible Investment Label (SRI) for the second intermediate housing fund (FLI II) and aims to obtain the label for two other funds.

¹ The Socially Responsible Investment policy may be consulted on AMPERE Gestion's website at [Our corporate social responsibility - AMPERE Gestion \(groupe-cdc-habitat.com\)](https://www.amperegestion.com/fr/our-corporate-social-responsibility)

AMPERE Gestion has also incorporated all of the changes made under EU Sustainable Finance Disclosure Regulation (SFDR) 2019/2088 adopted by the European Parliament and Council on 27 November 2019 concerning sustainability-related disclosures in the financial services sector, and Regulation (EU) 2020/852 adopted by the European Parliament and Council on 18 June 2020, setting up a framework to promote sustainable investment (known as the «Taxonomy» Regulation).

Consequently, the Company has classified its products under Regulation (EU) 2019/2088. As of 31 December 2021, 67% of assets under management are classified under Article 9, and 22% are classified under Article 8.

Lastly, in accordance with the requirements set out in Regulation (EU) 2019/2088, AMPERE Gestion publishes a Principal adverse sustainability impacts statement on its website².

² [Declaration concerning consideration of principal adverse sustainability impacts](#)

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1

AMPERE Gestion's general approach

1.1 AMPERE Gestion's SRI policy and strategy: an approach in phase with the identity of CDC Habitat group

■ A consistent approach in phase with that of CDC Habitat

AMPERE Gestion was created in April 2014 at the initiative of CDC Habitat. As Caisse des Dépôts' public interest real estate subsidiary and France's biggest social landlord with a portfolio of over 525,000 units of housing throughout France, CDC Habitat is a major stakeholder in French housing policy. As the operational business line of Banque des Territoires, CDC Habitat offers effective solutions to housing requirements and provides its customers with residential trajectories adapted to their needs and resources either on a rental or ownership basis.

AMPERE Gestion is a wholly-owned subsidiary of CDC Habitat and has obtained accreditation to act as a portfolio management company from the French financial markets authority (*Autorité des marchés financiers – AMF*). At the present time, its businesses consist of the following:

- managing Alternative Investment Funds (AIF) within the meaning of Directive 2011/61/EU (AIFM);
- providing asset management services for third parties within the meaning of Directive 2004/39/EU (MIF);
- providing investment consultancy services;
- providing real estate investment consultancy and real estate fiduciary management services.

In strict compliance with the regulations applicable to asset management services for third parties, AMPERE Gestion relies upon the businesses and expertise of CDC Habitat and its subsidiaries and the entire Caisse des Dépôts network.

When deploying its investment strategies, AMPERE Gestion is able to capitalise on the expertise of recognised teams to analyse an asset's position and optimal operating conditions, while taking full account of ESG criteria.

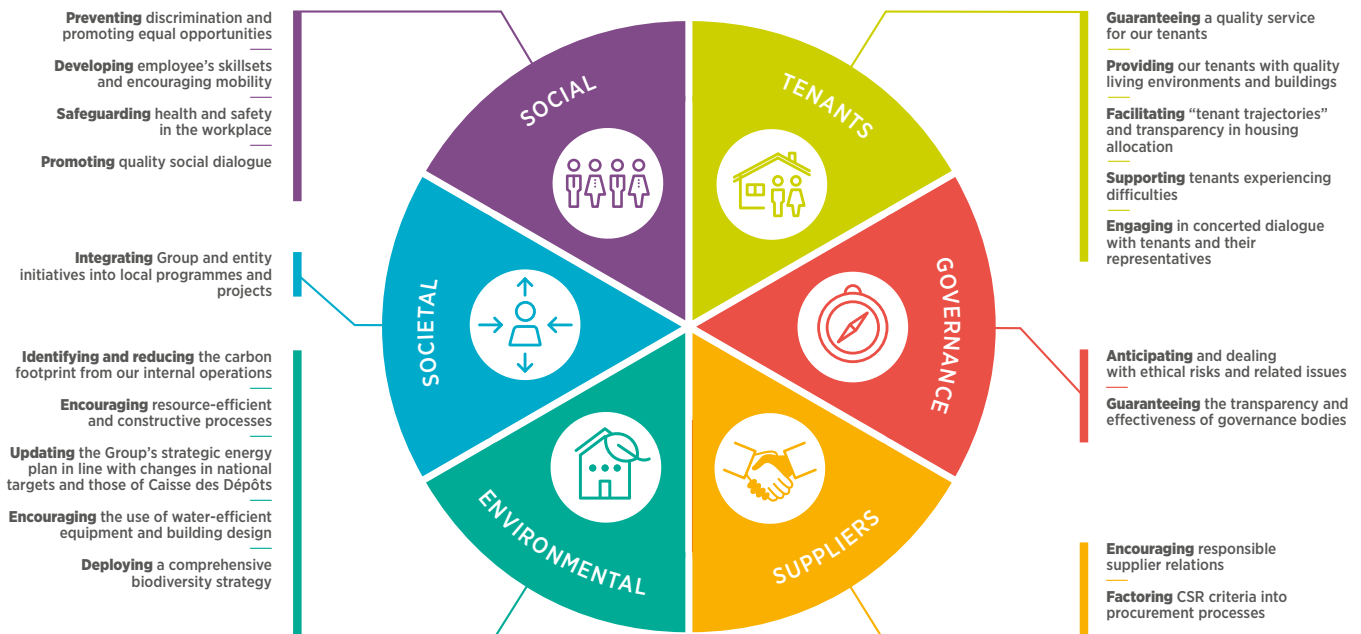
More specifically, relying primarily on CDC Habitat's teams to develop operations, rental management and property renovation gives AMPERE Gestion increased leverage to ensure traceability in the comprehensive application of ESG principles all along the operational chain.

AMPERE Gestion's Socially Responsible Investment (SRI) policy is therefore fully aligned with CDC Habitat's Corporate Social Responsibility (CSR) strategy. This ensures consistency between the financial decisions of AMPERE Gestion and their operational deployment by CDC Habitat teams.

As one of the leading players in the French housing sector, CDC Habitat has formally documented its commitments as part of a CSR policy that provides a clear definition and an oversight framework for its actions. The Group therefore conducts its business as a social landlord and property manager in a responsible manner, with a specific focus on its environmental impact, the quality of the service it provides to its tenants and the health and safety of its employees.

The Group's CSR policy adopted in January 2017 is structured around 6 pillars split into 19 CSR commitments, and was the fruit of a cross-disciplinary and collegial consultation process involving all stakeholders. It sets out a common and consistent framework that applies to all Group subsidiaries.

 **CDC Habitat's CSR policy was updated in 2021**



Affordable housing: a key responsible investment priority

As part of its work on impact investing, the UN has explicitly identified affordable housing as a responsible investment priority and one of the sectors where investors can play a key role in achieving the UN's Sustainable Development Goals, notably in combating poverty (Sustainable Development Goal No.1), affordable clean energy (Sustainable Development Goal No.7), reducing inequality (Sustainable Development Goal No.10), promoting sustainable cities and communities (Sustainable Development Goal No.11) and measures to combat climate change (Sustainable Development Goal No.13).



Access to affordable housing in big cities for key workers – essential for the day-to-day functioning of major cities – is one of the investment focuses currently being developed by AMPERE Gestion via several of its funds and service mandates with the aim of developing social infrastructure. Measuring environmental and social impacts in this sector provides an ideal framework for evaluating a fund's investment strategy and the extent to which social objectives and impacts are being achieved.

Formally documented ESG commitments and objectives tailored to each fund and mandate

For each fund and mandate, ESG commitments and objectives are devised based on the following:

- the ESG metrics specific to the fund's underlying assets (i.e., intermediate housing, open market housing, managed senior residences, managed student residences, care homes for the elderly, or medical social services facilities);
- the expectations of AIF / mandate investors concerning:
 - ESG criteria and assessment (selection of ESG criteria, use of an Asset Valuation process during the acquisition and/or management phase);
 - ESG reporting (ESG criteria, reporting frequency and guidelines);
 - engagement with fund stakeholders;
 - institutional commitments to specific reporting standards (e.g. GRESB), labels (e.g. the French Socially Responsible Investment Label (Label ISR)) or market reporting standards (e.g. INREV).

The ESG strategy and objectives of each AIF and mandate are in phase with AMPERE Gestion's Socially Responsible Investment Policy³ and CDC Habitat's Corporate Social Responsibility policy⁴.

Guidelines for each AIF and mandate regarding institutional commitments, stakeholder engagement and ESG assessment and reporting form part of the contractual documentation and, where applicable, regulatory documentation of the AIFs and mandates held by AMPERE Gestion (for example, the Investment Agreement and Shareholders Agreement, Management services agreement, Investment Thesis, Assistance and advisory service or rental management service agreement entered into with the property managers, etc.).

³ AMPERE Gestion's Socially Responsible Investment policy, September 2019 (in French)

⁴ <https://amperegestion.groupe-cdc-habitat.com/wp-content/uploads/sites/2/2021/01/SRI-Policy-AMPERE-Gestion-ENG.pdf>

1.2 Frequency and means used to inform investees

ESG reporting for AIFs / mandates (i.e., reporting to investors and market institutions) is the responsibility of AMPERE Gestion, with operational support, assistance and advice provided by CDC Habitat and external third parties, where necessary.

ESG reporting for AIFs / mandates is prepared by the SRI teams and validated by the fund managers.

ESG reporting for AIFs / mandates is prepared in full compliance with the applicable regulatory frameworks, and notably:

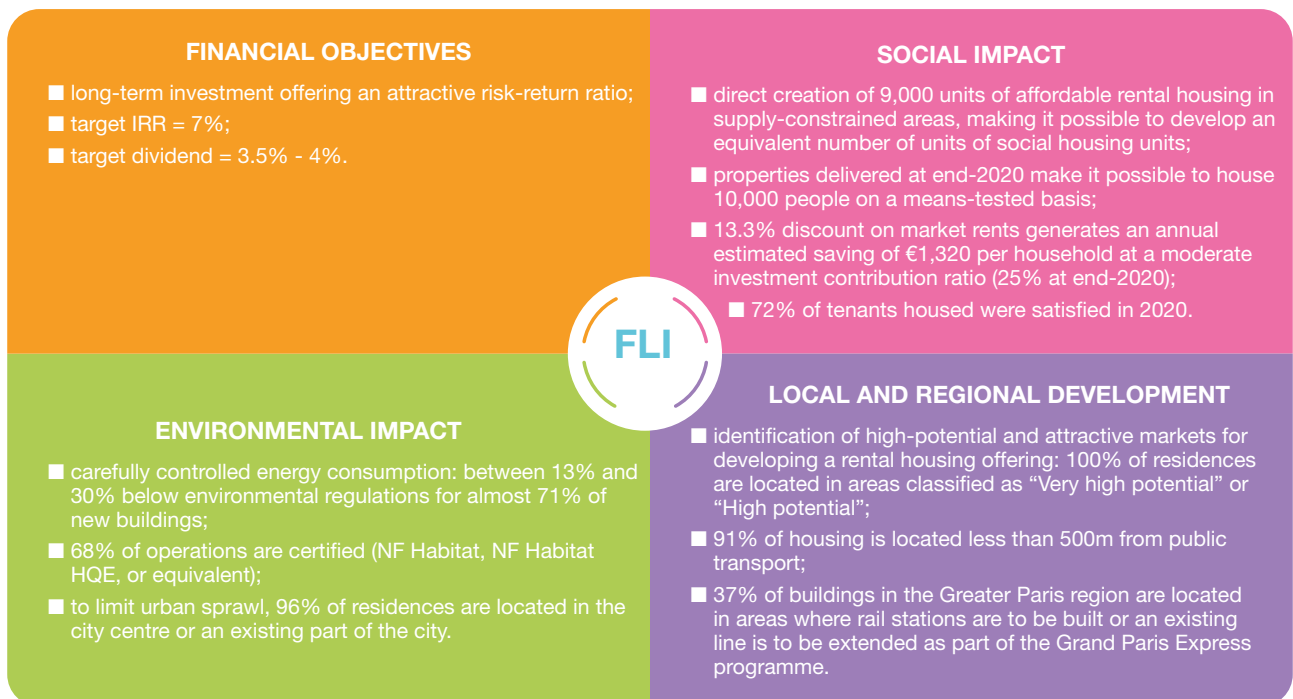
- the requirements of Regulation (EU) 2019/2088 adopted by the European Parliament and Council on 27 November 2019 concerning sustainability-related disclosures in the financial services sector and reporting of non-financial information;
- the requirements of Regulation (EU) 2020/852 adopted by the European Parliament and Council on 18 June 2020, setting up a framework to promote sustainable investment;

- the requirements of Article 29 of the French Law of 9 November 2019 on Energy and the Climate, reinforcing EU legislation on climate change and biodiversity risks and clarifying disclosure requirements concerning the integration of sustainability risks;
- comparing actual portfolio results with the ESG objectives pre-defined by the AIF/mandate as part of its ESG strategy, assessing the AIF/mandate's environmental and societal/social impact and measuring its contribution to the sustainable and inclusive economy.

The content of each AIF/mandate's reporting is prepared based on investor expectations as expressed in the fund's contractual documentation.

Investors are informed either on a quarterly or a half-yearly basis of the manner in which ESG criteria are factored into investment policy and strategy.

 [An example of the impact indicators tracked for one of our intermediate housing funds is provided in the following table:](#)



Moreover, AMPERE Gestion reports on its responsible investment strategy at least once a year in its responsible investment report, now known as the Article 29 Report under the French Law on Energy and the Climate. This report is published on the AMPERE Gestion website.

AMPERE Gestion has made the following institutional commitments:

- United Nations Principles for Responsible Investment (UNPRI)⁵ for all of AMPERE Gestion's activities;
- for the specific funds concerned:
 - Global Real Estate Sustainability Benchmark (GRESB);
 - the Socially Responsible Investment Label (Label ISR) created by the French Finance Ministry⁶.

1.3 List of financial products presented by asset type

AMPERE Gestion currently manages registered or regulated real estate funds that require the management expertise of CDC Habitat and Caisse des Dépôts in the areas of housing, emergency accommodation, managed student and senior residences and medical social services facilities. There is a major focus on affordable housing in response to a societal demand.

For AMPERE Gestion, as for the entire CDC Habitat group, residential property is a whole lot more than just an asset management business. It is also a commitment to society that is reflected in the team culture and business plan and in a continually enhanced socially responsible investment policy. Each fund or mandate meets public interest criteria and has a social utility component.

As of 31 December 2021, AMPERE Gestion operates the following investment and management strategies:

■ Hémisphère: tackling the emergency accommodation crisis

“Hémisphère” was launched in 2017 and is France's first social impact fund. To tackle the crisis in emergency accommodation, Hémisphère uses its investment capacity of €200 million to buy low-cost hotels which are renovated and restructured to provide accommodation and social support to homeless people or asylum seekers. The fund has already financed 6,000 units of emergency accommodation which are managed by Adoma, a subsidiary of CDC Habitat. As part of a social impact bond program, a portion of investor remuneration is contingent on non-financial objectives. There are four social objectives:

- enrolling children in school;
- access to social security;
- personalised support (signature of individual support projects);
- and helping families transition to permanent accommodation. The degree to which objectives are achieved is subject to an independent audit.

⁵ This report covers all of the funds managed by AMPERE Gestion

⁶ This report only covers funds that have obtained the French SRI label

■ The intermediate housing funds: building affordable housing in cities

AMPERE Gestion has created three funds dedicated to the production and management of intermediate housing, with a combined investment capacity of €6 billion or more than 30,000 units of housing. Fonds de Logement Intermédiaire (FLI), created in July 2014, brings together eighteen institutional investors and aims to build nearly 10,000 dwellings. The second intermediate housing fund, of similar size and dedicated to a Government investment programme, was created in 2015. The successor fund to FLI, FLI 2, brings together nineteen institutional investors and completed its fundraising in 2019 (€1,250 billion and target investment of around 11,000 units of housing). AMPERE Gestion has also been entrusted with a mandate from an institutional investor whose investment strategy is partially focused on intermediate housing.

In addition to financial objectives, the intermediate housing funds have a social utility component that involves:

- meeting public interest criteria by producing affordable housing in areas where rents are most expensive, thereby providing a housing offering at below-market rents that is adapted to middle class families;
- participating in the energy transition and building a more sustainable city by adhering to the highest building standards;
- rebalancing the residential investment landscape by attracting institutional investors, who are better able than private individuals to maintain a quality property portfolio over the long term.

■ Open market housing funds: producing quality housing for all households in the most supply-constrained markets

In supply-constrained markets where it is difficult to build intermediate housing, developing open market housing is an effective solution as it diversifies the local residential offering.

This type of housing is immediately available to potential tenants and there are no waiting lists as may be the case with social housing. There are no income ceilings for this type of housing, which may be offered to all households, mainly in the most densely populated economic and employment hubs.

Open market housing can enhance social mix in different regions and represents an essential link in the residential trajectories that AMPERE Gestion promotes in certain funds and mandates.

■ Student residences: providing students with suitably adapted accommodation

Faced with the current shortage of student accommodation, managed student residences help French education and research to meet the challenges of international competitiveness. They also meet a social need in the most supply-constrained areas while also contributing to local diversity.

Student residences underpin the public policy objective of providing suitably adapted student accommodation in inner city areas near teaching and research institutes and transport facilities. They are exemplary developments in terms of environmental and social quality and the manner in which they are operated.

■ Senior managed residences: adapting to an ageing population

Senior residences help meet the need to develop accommodation that is adapted to the elderly. They are aimed at that section of the senior population who no longer wish to or cannot remain in their own home (financial constraints, desire to move following the death of a spouse, loneliness, etc.) but who are not dependent. They therefore round out the nursing service offering provided by care homes on which public funds are now concentrated.

Managed residences are a solution to a long-term demographic trend and provide a range of services tailored to what seniors expect:

- response to a social need: ageing of the population, with an accommodation and service infrastructure dedicated to this section of the population;
- an offering that enhances neighbourhood mix and aims to locate residences as near as possible to services and transport.

The residences form part of the housing pathway of senior citizens and round out public policies that now focus on dependency. They are exemplary developments in terms of environmental and social quality and the manner in which they are operated.

Medical social services facilities: restructuring French medical social service real estate

Just like residential real estate as a whole, this category of asset comprises a social infrastructure designed to meet a growing demand among the elderly that complements managed senior residences: managing dependency and supporting care workers by developing an adapted offering.

Thus, medical social services facilities like care homes meet an increasingly pressing social need on two levels: caring for an ageing and dependent population on the one hand, while also providing support for carers and health workers on the other.

AMPERE Gestion's investment portfolio may be broken down as follows at 31 December 2021:

CLASSIFICATION DISCLOSURE	NUMBER OF FUNDS AND MANDATES	NUMBER OF HOUSING UNITS* SIGNED	ASSETS UNDER MANAGEMENT
ARTICLE 9 SFDR	7 funds and 1 mandate	23,250	€3,414 million
ARTICLE 8 SFDR	3 funds	5,750	€1,136 million
ARTICLE 6 SFDR	1 mandate	3,157	€528 million

* or equivalent number of units for real estate under management

1.4 Implementation of process of integrating Environment, Social and Governance criteria (ESG) into investment policy and fund management

1.4.1 Methodology for analysing environment, social and governance criteria

To ensure that ESG criteria are factored into and evaluated in fund investment and management strategies, AMPERE Gestion can now avail of analytical and programming applications developed in the course of work performed by the research and study teams.

When fund investment strategies are being formulated, the objective, up-to-date data supplied by these applications are used in the pre-project phase to establish detailed ESG metrics in line with regulations and market trends.

In the project phase, during the investment and management process, these applications provide reliable indicators and measure the CSR compliance of the portfolio against stated objectives.

Focus on environmental metrics

The building sector accounts for almost half of national energy consumption and a quarter of greenhouse gas emissions. This sector must act to limit its contribution to climate change. With more than 525,000 housing units in portfolio, CDC Habitat group and its subsidiary AMPERE Gestion are working to limit their environmental footprint.

In line with the objectives enshrined in international agreements (the 2015 Paris Climate Agreement) and French Government legislation (the Law on the energy transition and green growth (TECV) of 17 August 2015, the National Low Carbon Strategy of 2017 and 2019, and the Law of 8 November 2019 on Energy and the Climate), CDC Habitat and AMPERE Gestion have adopted a structured and organised approach to limiting the energy consumption and greenhouse gas emissions of their property portfolios in order to keep global warming down to 2°C – or even 1.5°C – in 2050, when compared to 1990.

From an environmental perspective, the funds managed by AMPERE Gestion are in phase with the objectives and resources set out in CDC Habitat group's Energy Strategy Plan (ESP), which breaks down the actions to be deployed in new and existing buildings into three phases:

- cutting the energy consumption of dwellings through smart bioclimatic design;
- deploying efficient systems that limit the quantities of energy required to meet tenant needs; and
- developing renewable energies in an ambitious but realistic manner.

For existing buildings whose energy performance is not in line with CDC Habitat and AMPERE Gestion climate objectives, energy audits are performed by an external research office and ambitious works programmes are scheduled based on recommendations.

For new buildings acquired on an off-plan basis (in French: VEFA – Vente en l'Etat Futur d'Achèvement) from developers, especially as part of large-scale partnerships, since 2015, CDC Habitat group and AMPERE Gestion have targeted new operations that exceed French RT 2012 energy performance targets and the related exemption granted by the Government.

There is a major focus on adapting ecosystems to climate change, and more specifically adapting agricultural and natural spaces and forests so that nature can keep providing us with the vital services we need. In 2015, CDC Habitat group deployed an impact avoidance-reduction-offsetting strategy aimed at preserving biodiversity. The investment project selection process includes criteria covering the projects' environmental impact (contribution to urban sprawl), the proximity of public transport and various local services.

Strategies for aligning environmental objectives, particularly those related to climate and biodiversity, are presented in sections 4.1 and 4.2 of this document.

■ Focus on social and local and regional development metrics

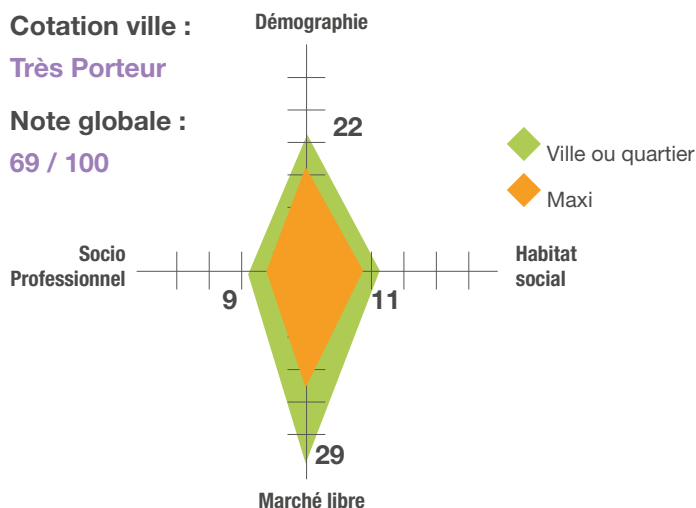
From a societal perspective, AMPERE Gestion identifies and quantifies demand among different sections of the population (the middle classes, students, seniors, etc.) and devises targeted investment strategies to build rental housing adapted to the needs of the local population and community. In its different forms, affordable housing has emerged as the most effective instrument for strengthening social cohesion and promoting balanced urban development. In line with the social utility mission that guides its investment and management strategies, AMPERE Gestion deploys tools for analysing each local market for the purpose of answering three questions:

- where should we build and invest?
- who should we build for?
- what type of product should be built and acquired?

In the case of housing, i.e., open market or intermediate housing or accommodation for students or seniors, a number of statistical analysis tools may be used to answer these questions:

- **the Market Approach factsheet** identifies high potential areas throughout France. It aggregates statistical data for a given territory, at department, employment hub, municipality or neighbourhood level. Real estate reference data for the sector (i.e., property prices, current and projected levels of production, abundance or shortage of supply, possible competition from the social housing sector) from various sources (INSEE [French statistical institute], Sitadel, Rpls, French notaries, Clameur [rent observatory]) as well as socio-demographic data (i.e., socio-professional categories, employment rate, population growth rate, household income) is used to classify areas as either Very high potential, High potential, High potential micro market or Low potential.

Extrait de la fiche Approche Marché de Bordeaux



The following results were obtained using this tool for open market and intermediate housing funds currently managed by AMPERE Gestion:

- **85% of residences⁷** are located in areas classified as “Very high potential”;
- **14% in areas classified** as “High potential”.

- **the Conurbation plan** (Schéma d’Agglomération in French) which makes it possible to accurately determine housing demand at local level. This second investment decision-support application for both new and existing housing complements the Market Approach factsheet by calculating housing demand in the main cities and identifying the products needed to meet this demand. The detailed analysis of demographic patterns is rounded out by a 10 year forecast of housing needs based on demographic growth, changes in the average size of households, market liquidity and redevelopment of the existing stock of housing.

Extrait du schéma d’agglomération de Bordeaux



⁷ Analysis performed on 832 open market and intermediate housing residences comprising 25,233 dwellings.

Using these elements, it is possible to estimate the demand for housing and to compare this with housing production to assess whether this covers demand without creating oversupply, and to identify a target clientele and ideal dwelling type.

These tools are systematically used to devise investment strategies and analyse investment opportunities. They provide a formally documented, standard framework for all real estate throughout France. In the case of intermediate housing, for example, this demographic and economic approach has been used to identify 23 cities and urban areas that constitute possible markets for intermediate housing. For the 17 highest potential areas, the demand for intermediate housing was estimated at 85,000 units in 2014 (through 2019). Moreover, the April 2021 report by the Inspection Générale des Finances, "Growing the supply of intermediate rental housing by institutional investors", estimated that between 180,000 and 420,000 units of housing needed to be built, with the strongest demand in the most supply-constrained areas.⁸

Specific applications have been created for senior housing and student housing using the same methodology. All of the analyses performed by CDC Habitat have been brought together in a study entitled 'Housing and demographic and societal challenges' (French: L'habitat au défi de l'évolution démographique et sociétale).

■ Focus on governance metrics

As regards governance, an internal control and risk management system is deployed by the Compliance Officer under the responsibility of AMPERE Gestion senior management.

As a portfolio management company, AMPERE Gestion must comply with all legislation relating to anti-money laundering and countering the financing of terrorism (AML-CFT) and a comprehensive system has been set up for this purpose. Effective controls are performed both on counterparties and property developers during the investment and arbitrage phase by rating AML/CFT risk and filtering based on black lists to ensure compliance with international sanctions and embargoes. Specific resources are deployed within AMPERE Gestion to ensure compliance with current laws and regulations in force.

Naturally, the system tracks compliance with investment and management obligations, the deployment of investment strategies and ESG metrics.

1.4.2 Systematically documented ESG objectives and indicators tailored to different asset categories and property portfolio characteristics

AMPERE Gestion systematically identifies the ESG characteristics of properties at acquisition based on formally documented and exhaustive analyses (for housing, managed residences, care homes and medical social services facilities). These non-financial characteristics are based on qualitative and quantitative indicators deployed via formally documented (internal or external) applications and standardised, systematic processes.

Each property is analysed by the CDC Habitat group Commitments Committee, chaired by its Executive Management, which brings together all of the Group's management, asset management, research and acquisition expertise. In accordance with the Fund Manager's principles of autonomy and independence, the Committee's findings are not binding on AMPERE Gestion's ultimate investment decision.

The Committee may or may not authorise continuation of the study and negotiation with a view to acquisition, under the conditions set out and recorded in the minutes. It may eliminate proposed investments that contain specific risks (including non-compliance with SRI objectives such as energy performance) or non-compliant proposals.

⁸ [Public report by the Inspection Générale des Finances \(IGF\) - Développement de l'offre de logement locatif intermédiaire par les investisseurs institutionnels. \(finances.gouv.fr\)](https://www.igf.finances.gouv.fr/)

Investment files are prepared by the local development teams and independently verified by the central development teams. The files include several items of ESG information provided by internal and external analysis and programming applications:

- market due diligence: CDC Habitat Market Approach factsheet score, estimated rent scales, market study performed by an external service provider Adequacy;
- technical and environmental due-diligence: standardised scorecard rating the technical and environmental characteristics of the properties (energy performance, certification, etc.);
- compliance with CDC Habitat standards;
- analysis of potential legal risks inherent in the operation.

Once operations have been approved by the Commitments Committee, the ESG data is input to the system for tracking investment projects, which stores all technical, financial, legal and operational information.

For certain funds and mandates (number and identity must be specified), the ESG data collected is integrated into ESG scorecards, broken down by type of property, by the teams in charge of SRI who perform the following tasks:

- analysis of individual indicators and the asset's overall ESG score;
- comparison with prior-year results, if relevant;
- comparison with the AIF/mandate objectives set out in the SRI strategy;
- consolidation of individual indicators at AIF/mandate portfolio level.

Depending on the SRI strategy of each AIF/mandate, the fund manager may decide to deploy action plans designed to improve the asset's ESG rating by focusing on one or several indicators used in the evaluation.

Take an example:

- environmental and property indicators (thermal insulation work designed to reduce the building's energy consumption and reduce building charges for tenants if energy performance is below the fund's target);
- tenant-based indicators (measures to raise tenant awareness of energy and water consumption, etc.).

This improvement plan must meet the following criteria:

- be prepared in liaison with the building property manager and formally approved by the fund manager;
- be formally documented – appended to the building assessment – specifying the indicators on which the actions are based, the cost associated with each action, the objectives and implementation schedule (provisional start and end dates for deployment, details of any specific phases);
- the action plan budget must be integrated into the building budget and works plan.

Action plans are tracked throughout the year by the fund manager within the scope of formal exchanges with the property manager at meetings and/or committees that discuss the AIF/mandate's SRI focuses.

In subsequent years following the first assessment in the operational phase, the ESG assessment is recalculated in line with the process described previously. More specifically, the following criteria are analysed:

- deployment of any improvement plan vis-à-vis the planned schedule;
- if deployment has been completed, any impacts already observable on the indicators concerned;
- any difficulties encountered in implementing the action plan.

Based on the impact investment approach prized by certain AMPERE Gestion AIFs/mandates, the commitments given by these financial vehicles in relation to these key criteria must be converted into specific objectives and tracked using formally documented ESG indicators.

 **Examples of environmental and property objectives and indicators**

Challenges	Commitments	Objectives	Examples of indicators
Energy consumption and climate change	<ul style="list-style-type: none"> ■ cutting the energy consumption of dwellings through smart bioclimatic design; ■ deploying efficient systems that limit the quantities of energy required to meet tenant needs. 	<ul style="list-style-type: none"> ■ new builds: propose properties with better than the minimum performance required under French RT 2012 energy performance regulations; ■ obtain NF Habitat or NF Habitat HQE certification for the entire portfolio and Label E+C- for part of the portfolio; ■ existing property portfolio: the least energy efficient part of the portfolio (F or G energy label) will be subject to an energy retrofit programme by 2025. 	<ul style="list-style-type: none"> ■ annual measurement of energy consumption (kWhpe/m²/year) for the managed portfolio; ■ number of properties certified NF Habitat or NF Habitat HQE; ■ number of properties with Label E+C-; ■ annual measurement of GHG emissions from the managed portfolio; ■ average distance of properties from public transport.
Water consumption	<ul style="list-style-type: none"> ■ promoting the design and installation of water-saving devices in buildings. 	<ul style="list-style-type: none"> ■ existing property portfolio and new builds: propose housing equipped with systems for controlling and measuring water consumption. 	<ul style="list-style-type: none"> ■ number of properties with water consumption certification or label; ■ number of properties equipped with low-flow taps; ■ annual measurement of water consumption in the managed portfolio.
Biodiversity	<ul style="list-style-type: none"> ■ limiting the use of natural or agricultural space and fostering biodiversity by combating urban sprawl. 	<ul style="list-style-type: none"> ■ aim for a majority of new projects that make only a limited contribution to urban sprawl; ■ promoting buildings that have adopted a pro-diversity programme. 	<ul style="list-style-type: none"> ■ number of properties that make only a limited contribution to urban sprawl; ■ number of properties with Biodiversity certification or labelling; ■ Number of properties located in an eco-neighbourhood or mixed development zone (ZAC).
Circular economy	<ul style="list-style-type: none"> ■ encouraging resource-efficient building practices. 	<ul style="list-style-type: none"> ■ containing and preventing the risk of soil pollution; ■ containing the impacts of waste in the building phase. 	<ul style="list-style-type: none"> ■ number of building sites with a Clean Worksites Charter; ■ number of buildings where dwellings are equipped with waste sorting facilities.
Quality of buildings and living environment	<ul style="list-style-type: none"> ■ providing tenants with a quality building and living environment. 	<ul style="list-style-type: none"> ■ ensuring that services and amenities comply with standard technical specifications (environmental quality, comfort and use). 	<ul style="list-style-type: none"> ■ number of properties with comfort certification or labelling.

 **Examples of social and local and regional development objectives and indicators**

Challenges	Commitments	Objectives	Examples of indicators
Intermediate housing	<ul style="list-style-type: none"> ■ providing affordable rental housing in supply-constrained areas; ■ supporting programmes to build social housing, which systematically accompanies intermediate housing; ■ guaranteeing a quality service for our tenants. 	<ul style="list-style-type: none"> ■ direct fund investment to provide housing for over 60,000 people (2.1 people per dwelling) at affordable rents; ■ direct creation of nearly 30,000 intermediate housing units in supply-constrained areas, making it possible to develop 44,000 units of social housing; ■ protecting tenants based on a Landlord quality charter; ■ Proposing innovative services. 	<ul style="list-style-type: none"> ■ number of households accommodated and response to demand in supply-constrained areas; ■ rents saved vis-à-vis the market rate; ■ average tenant occupancy cost ratio; ■ number of social housing units created in needy areas (Urban Solidarity and Renewal quota [SRU] < 35%); ■ average profile of operations by type of housing; ■ tenant satisfaction rate; ■ digital and local services.
Emergency accommodation	<ul style="list-style-type: none"> ■ accommodation and social support of vulnerable people; ■ refocusing emergency accommodation in regions where demand is greatest. 	<ul style="list-style-type: none"> ■ objective of creating 10,000 units of accommodation (6,000 units created through end-2018); ■ 59 residences located throughout France. 	<ul style="list-style-type: none"> ■ percentage of children in accommodation attending school during the year; ■ percentage of households receiving social support; ■ percentage of eligible people who get access to social security; ■ percentage of people rehoused in longer-term accommodation (social reintegration facilities).
Senior residences	<ul style="list-style-type: none"> ■ providing housing opportunities for seniors and responding to the demand for housing and services adapted to an ageing population. 	<ul style="list-style-type: none"> ■ objective of creating 1,100 adapted and secure housing units with a range of services designed to preserve the autonomy of seniors and prevent them from becoming isolated. 	<ul style="list-style-type: none"> ■ proportion of residences located in attractive or very attractive areas for senior citizens; ■ medical service ratio in the area.
Student residences	<ul style="list-style-type: none"> ■ responding to the scarcity of student accommodation by providing a range of suitably adapted residences close to major university hubs. 	<ul style="list-style-type: none"> ■ objective of creating 750 accommodation units with a suitably adapted service offering close to university hubs and transport links. 	<ul style="list-style-type: none"> ■ proportion of residences located in areas with a shortage of student accommodation.
Medical social services facilities (care homes, etc.)	<ul style="list-style-type: none"> ■ financing the restructuring of the medical social services sector by providing places in nursing homes at controlled rents. 	<ul style="list-style-type: none"> ■ objective of creating or restructuring 400 affordable places in care homes per year with a range of services focused on wellness, autonomy and prevention. 	<ul style="list-style-type: none"> ■ proportion of care homes that deploy an approach centred around patient welfare; ■ proportion of care homes offering services designed to maintain social ties and physical and mental autonomy.

 **Examples of governance objectives and indicators**

Challenges	Commitments	Objectives	Examples of indicators
Ethics	<ul style="list-style-type: none"> ■ 1 - anti-money laundering and countering the financing of terrorism (AML-CFT); ■ 2 - preventing corruption risks at fund manager level. 	<ul style="list-style-type: none"> ■ assessing the compliance of the fund manager's AML/ CFT processes with regard to regulatory requirements; ■ assessing counterparty AML/ CFT risk; ■ deployment of processes covering personal transactions, gifts and benefits, in accordance with the Sapin Law. 	<ul style="list-style-type: none"> ■ findings of the control report and second-tier controls prepared by AMPERE Gestion's Compliance Officer; ■ property developer / seller risk classification, regularly updated by the Compliance Officer; ■ series of procedures overseen by the Compliance Officer: risk mapping and declaration processes.
ESG strategy	<ul style="list-style-type: none"> ■ ensuring compliance with the investment process set out in the fund manager's procedures. 	<ul style="list-style-type: none"> ■ assessing whether the investment opportunity complies with all guidelines and standards that apply to this type of property. 	<ul style="list-style-type: none"> ■ performing ESG due diligence and approval of investment opportunity by the Investment Committee; ■ formal documentation and deployment of an ESG improvement plan (in line with fund strategy).
Responsible procurement	<ul style="list-style-type: none"> ■ promoting responsible supplier relations. 	<ul style="list-style-type: none"> ■ formal documentation of ESG commitments with suppliers and service providers. 	<ul style="list-style-type: none"> ■ proportion of suppliers and service providers who have signed the AMPERE Gestion ESG Commitment Charter.

The following table presents all of the ESG objectives used in the identification process and assessed during the acquisition and/or management phase for the funds in question subject to an ESG rating:

AMPERE GESTION'S SRI POLICY	N°. of focus / challenge	ESG rating Acquisition-side	ESG rating Management-side
ENVIRONMENT	I.		
Energy consumption throughout the property portfolio and climate change	1.1	yes	yes
Water consumption throughout the property portfolio	1.2	yes	yes
Biodiversity	1.3	yes	yes
Waste management and the circular economy	1.4	yes	yes
SOCIAL	II.		
Health and safety of occupants and personnel	2.1	yes	yes
Environmental climate and social risks	2.2	yes	yes
GOVERNANCE	III.		
Anti-money laundering and countering the financing of terrorism (ALM/CFT)	3.1	yes	yes
Fight against corruption and preventing conflicts of interest	3.2	yes	yes
ESG strategy	3.3	yes	yes
SOCIETAL	IV.		
Meeting local and regional development needs	4.1	yes	yes
Social and functional diversity	4.2	yes	no
Mobility	4.3	yes	yes
TENANTS	V.		
Quality of living environment	5.1	yes	yes
Comfort and wellness	5.2	yes	yes
Accessibility for people with reduced mobility (PRM)	5.3	yes	yes
Service quality	5.4	no	yes
Housing opportunities	5.5	no	yes
Participative or collective approach	5.6	no	yes
SUPPLIERS	VI.		
Responsible procurement	6.1	yes	yes

1.5 Signature of charters, codes and initiatives or award of labels

AMPERE Gestion encourages responsible investing by actively participating in working groups coordinated by sector-based bodies that enable us to share our know-how and improve practices across the entire real estate sector.

More specifically, AMPERE Gestion is a member of the following:

UN PRI: commitment to international standards

In June 2017, AMPERE Gestion signed up to the United Nations Principles for Responsible Investment (PRI). These internationally recognised principles enable the signatories to certify their commitment to responsible investment and to join a global community. The Principles for Responsible Investment are as follows:

- *Principle 1:* We will incorporate ESG issues into investment analysis and decision-making processes;
- *Principle 2:* We will be active owners and incorporate ESG issues into our ownership policies and practices;
- *Principle 3:* We will seek appropriate disclosure on ESG issues by the entities in which we invest;

- *Principle 4:* We will promote acceptance and implementation of the Principles within the investment industry;
- *Principle 5:* We will work together to enhance our effectiveness in implementing the Principles;
- *Principle 6:* We will each report on our activities and progress towards implementing the Principles.

By signing up to the Principles, AMPERE Gestion has undertaken to deploy an exhaustive annual reporting process that culminates in a publicly-disclosed evaluation. In 2020, the PRI evaluation division awarded AMPERE Gestion an A+ (highest score) for all modules completed (Strategy & Governance and Real Estate).



This is the most recent score as the results of the 2021 evaluations are not yet available.

GRESB:

AMPERE Gestion obtained a score of 29/30 on the Management module for one of its intermediate housing funds (FLI II).



Management Score

GRESB Average

26

Benchmark Average

27

■ **SRI label:**

AMPERE Gestion has obtained the French SRI label (Label ISR) for its second intermediate housing fund (FLI II), due recognition of its highly ambitious and rigorous SRI policy.

■ **Association Française des Sociétés de Placement Immobilier (ASPIM – French association of real estate investment companies) and,**

in particular the working group tasked with creating an SRI label for the real estate sector and an SRI Commission. Together with PWC Panorama, this working group has published a guide to responsible investing and key investment regulations for real estate portfolio management companies;

■ **Association Française de la Gestion financière (AFG – French asset management association):**

■ **Urban Land Institute (ULI).**

As well as actively participating in sector-based bodies, AMPERE Gestion's teams share their expertise at numerous seminars and conferences and in the reports of leading real estate organisations such as the European Association for Investors in Non-Listed Real Estate Vehicles (INREV), Institut de l'Épargne Immobilière et Foncière (IEIF, an independent French research organization) and the Urban Land Institute (ULI).

2

Internal resources deployed by AMPERE Gestion

2.1 Human resources and SRI governance in AMPERE Gestion

2.1.1 AMPERE Gestion's Management Board

The Management Board devises all of AMPERE Gestion's socially responsible investment strategic focuses and ensures they are implemented properly.

AMPERE Gestion's Socially Responsible Investment policy of engaging with key stakeholders and its guidelines for analysing and evaluating ESG metrics and ESG reporting for AIFs/mandates are reviewed and approved by the Management Board.

■ Objective of gender parity

The French law to accelerate economic and professional equality, known as the Rixain Law⁹, adopted on 24 December 2021, aims to achieve more equality between women and men in the day-to-day lives of women, in the sphere of education, research and the economy, and more particularly to promote female entrepreneurs.

As such, portfolio management companies' Article 29 report must include a gender balance objective for the employees who actually make investment decisions. The new article introduced into the French Monetary and Financial Code (Code monétaire et financier)¹⁰ stipulates that "Portfolio management companies shall set gender balance targets for the teams, bodies and managers responsible for taking investment decisions. The results obtained shall be presented in the document mentioned in section II of Article L. 533-22-1. This target shall be updated on an annual basis."

AMPERE Gestion thus aims for gender balance while stressing the limits in terms of size and organisation and it sets a quantified minimum objective of 30% of each gender within the teams, bodies and managers responsible for taking investment decisions. This objective naturally factors in the initial gender distribution, the size of the company and its development prospects, its recruitment needs and the specific features of the sector.

At 31 December 2021, the teams and bodies responsible for taking investment decisions were comprised of 58% women and 42% men, which is in line with the Company's objectives.

⁹ Law published in the official gazette (Journal Officiel) of 26/12/2021 under No. 2021-1774

¹⁰ Article L. 533-22-2-4, sub-section 2, section 5, Chapter III of Part III of Book V «Service providers».

2.1.2 Operational responsibility

AMPERE Gestion has an internal SRI team comprising 3.2 FTEs working closely with the management teams. Operational responsibility is entrusted to:

- an SRI Officer, who is also an intermediate housing fund manager, reporting directly to the CEO of AMPERE Gestion. S/he devotes 30% of their time to SRI, ensuring that ESG criteria are consistently incorporated throughout the investment and asset management process;
- two SRI/ESG analysts, reporting to the SRI Officer;
- one person tasked with overseeing and enhancing the energy performance of the property portfolios, reporting to the head of energy and environmental strategy of CDC Habitat's Property Portfolio division, and seconded to AMPERE Gestion for 90% of their time.

This operational team is tasked with structuring AMPERE Gestion's SRI policy, deploying SRI strategy for the funds and mandates, performing ESG assessments on fund/mandate assets and standard ESG reporting for each fund/mandate.

2.1.3 Governance of CDC Habitat's SRI function

Corporate Social Responsibility (CSR) is the responsibility of the CEO of CDC Habitat, a member of CDC Habitat's Management Board. S/he chairs the CSR Strategy Committee, which brings together all of the support and operational team directors and business line directors (i.e., intermediate and social housing and emergency accommodation, and fund management) along with representatives from the different Group entities. The Commission meets three to four times a year to deliberate on the Group's CSR strategy.

AMPERE Gestion is represented on the Commission because of the third-party management activities it provides.

Each aspect of CSR policy is handled by a specific department in charge of overseeing specific actions. CSR correspondents have been appointed in each support and operating division to handle the day-to-day aspects of CSR.

2.1.4 Organisation of relations between AMPERE Gestion and CDC Habitat

AMPERE Gestion avails of the expertise of CDC Habitat's business lines and functional departments for several missions related to Socially Responsible Investment:

- assistance and advice in devising fund SRI strategy (strategic focuses and ESG criteria) and AIFs / mandates;
- assistance and advice in integrating, analysing and tracking ESG criteria in AIF/mandate investment policy and fund management.

SRI-related missions entrusted to CDC Habitat are set out in the assistance and advisory services or rental management service agreements signed between AMPERE Gestion and CDC Habitat on behalf of the AIFs/mandates.

An annual SRI Steering Committee meeting is organised for this purpose between AMPERE Gestion and the CDC Habitat business lines and functional departments involved in developing and deploying SRI strategies for the funds and mandates concerned. This Steering Committee focuses in particular on:

- the annual review of the characteristics, ESG assessments (if applicable) and action plans (both future and ongoing);
- review of characteristics that do not comply with the objectives of the funds and mandates concerned.

2.1.5 Remuneration policy

AMPERE Gestion's remuneration policy complies with Directive 2011/61/EU (AIFM Directive) and Article L. 533-22-2 of the French Monetary and Financial Code (Code monétaire et financier). This policy aims to establish and maintain compensation practices that are compatible with sound and effective risk management and reflect AMPERE Gestion and CDC Habitat group compensation guidelines for employees whose professional activities have a substantial impact on the risk profile of each AIF managed.

The purpose of this policy is to set out remuneration guidelines to ensure that:

- employees are remunerated in an appropriate manner in terms of their contribution to the Company's business and benchmarks for the sector;
- employees are incentivised and motivated to act in all circumstances in the interests of the AIFs managed and their investors and in the interests of the Company.

The remuneration policy complies with the economic strategy, objectives, values and interests of AMPERE Gestion and the AIFs it manages and those of the unit holders or shareholders of the AIF, and includes measures designed to avoid conflicts of interest.

Remuneration policy is also designed to comply with the "Disclosure" regulation concerning the integration of sustainability risk and ensuring that AMPERE Gestion's remuneration structure does not encourage excessive sustainability risk-taking. As such, AMPERE Gestion has taken the following measures:

- the ESG performance of AIFs or mandates is also included in manager's annual objectives. Qualitative objectives are focused on developing impact investing objectives and ensuring good governance;
- ESG performances are also factored into the annual objectives of the management functions to ensure there is a consistent ESG approach to managing AIFs and mandates in phase with the SRI strategy of each one (SRI label, SRI policy, etc.);
- the people tasked with ESG-related issues have been allocated qualitative or quantitative objectives to limit any environmental, social or governance event or situations that could have a negative impact on the value of AMPERE Gestion's investments. The following examples, which focus on variable remuneration, are designed to tackle sustainability risk: SRI ratings for operations carried out on behalf of an AIF or mandate; formally documented plans for enhancing ESG impacts; structured SRI policy and applications; ongoing ESG regulatory watch and periodic reporting to investors.

AMPERE Gestion's remuneration policy is available from the Company upon request.

2.2 Technical resources deployed by AMPERE Gestion

The main technical resources used in AMPERE Gestion's ESG analysis process come mainly from traceable in-house tools and expertise and from comprehensive ESG expertise developed by CDC Habitat and AMPERE Gestion, in particular based on numerous documents and strategic applications developed for each aspect of ESG.

Moreover, for the funds and mandates concerned, AMPERE Gestion (with the assistance of CDC Habitat's Information Systems Department) has developed an in-house ESG assessment tool (i) for the acquisition phase and (ii) the management phase.

3

Strategy, engagement and voting policy

3.1 Voting policy

For information, AMPERE Gestion invests mainly in real estate assets owned either directly or indirectly by holding structures (i.e., French SAS [simplified joint-stock companies] or SCI [real estate investment companies]) created and owned by AIFs or mandates held by AMPERE Gestion.

Voting rights in unlisted shares — notably those in holding structures owned by AIFs (SAS, SCI, etc.) — are fully exercised by AMPERE Gestion in the interests of its clients. Unlisted entities owned by AIFs or mandates are holding structures created for the purpose of owning and operating buildings that remain under majority or exclusive control of the AIFs or mandates held by AMPERE Gestion. Therefore, the management company has no reason to vote against the resolutions proposed at the general meeting on behalf of the AIFs or mandates held.

Certain AIFs/mandates held by AMPERE Gestion have deployed a policy for actively engaging with key stakeholders.

Stakeholder engagement focuses on:

- tenants;
- operators of managed residences;
- property managers mandated by the AIFs/mandates;
- administrative service providers handled by AMPERE Gestion, and administrative service providers and works companies handled by CDC Habitat as property manager.

3.2 Stakeholder engagement policy

3.2.1 Formal stakeholder engagement processes

■ Tenants

The ESG engagement policy of AIFs/mandates vis-à-vis tenants is based around framework documents such as the CDC Habitat Quality Charter and other documents handed out to tenants, e.g., tenant handbook and booklets providing tips on eco-gestures.

It may also take the form of environmental appendices for commercial property.

■ Operators of managed residences

For AIFs/mandates whose SRI strategy includes a stakeholder engagement policy, ESG engagement policy vis-à-vis operators of managed residences is formally set out in environmental appendices to the business lease.

■ Property managers

For AIFs/mandates whose SRI strategy includes a stakeholder engagement policy, ESG engagement policy vis-à-vis property managers is formally set out in rental management service agreements.

■ Service providers and suppliers

The ESG engagement policy of AIFs/mandates vis-à-vis service providers is based around the ESG Commitment Charter:

- for AIFs/mandates whose SRI strategy includes a stakeholder ESG engagement policy, and whose service providers are managed by AMPERE Gestion: the Charter is appended to service agreements or sent to existing service providers if the related contracts were concluded before the Charter was finalised;
- for AIFs/mandates whose SRI strategy does not include a stakeholder ESG engagement policy, the Charter is not sent to service providers.

3.2.2 ESG reporting specifically focused on stakeholder engagement policy

For AIFs/mandates whose SRI strategy includes a stakeholder engagement policy and reporting of actions deployed as part of this process, ESG reporting includes disclosures of the actions undertaken (satisfaction surveys, circulation of CSR Charter, etc.) in accordance with the reporting guidelines laid down for each AIF/mandate.

4

Alignment with climate-related objectives

4.1 Disclosures concerning the strategy of alignment with international targets for limiting global warming under the Paris Climate Agreement

The building sector accounts for almost half of national energy consumption and a quarter of greenhouse gas emissions. This sector must act to limit its contribution to climate change. With more than 525,000 housing units in portfolio, CDC Habitat group has been working to limit its environmental footprint for over 10 years.

CDC Habitat and AMPERE Gestion have adopted a structured and organised approach to limiting the energy consumption and greenhouse gas emissions of their property portfolios in order to limit global warming to 2°C in 2050, when compared to 1990 – or even 1.5°C, in line with the objectives of the Paris Climate Agreement.

To be able to keep to this trajectory, CDC Habitat group and AMPERE Gestion have committed to the National Low Carbon Strategy (SNBC, version 2017) by aiming for a low-energy building portfolio (BBC) by 2050 (average of 80 kWhEP/m²/year).

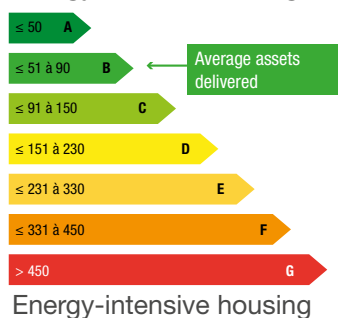
To do this, both the Group and AMPERE Gestion have set interim targets: an average energy performance assessment of 150 kWhEP/m²/year by end-2020, followed by an average energy performance assessment of 127 kWhEP/m²/year by end-2030.

To track these objectives over time, CDC Habitat and AMPERE Gestion use the energy performance assessments performed on the units as and when they are delivered.

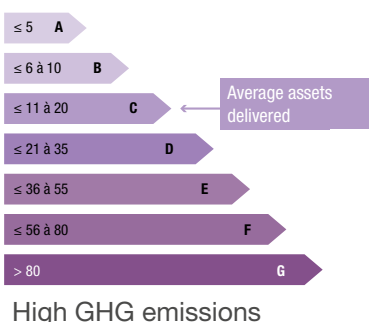
For the funds and mandates for which CDC Habitat is property manager, the analysis of the energy performance assessments of the buildings delivered up to 31 December 2021 highlights the excellent energy performance and environmental quality of AMPERE Gestion’s properties:

- average energy consumption is 63.5 kWhEP/m²/year, corresponding to a B under the scale used in French energy performance assessments;
- greenhouse gas emissions average 10.5 kgCO₂/m²/year, corresponding to a C under the scale used in French climate performance assessments.

Energy-efficient housing



Low GHG emissions



4.2 Actions undertaken in existing buildings

There are 7 million poorly insulated dwellings in France. The existing stock of housing currently represents a major challenge for the real estate sector in terms of carbon neutrality objectives and every year CDC Habitat group commits to energy retrofits throughout its portfolio.

For each building in the existing portfolio whose energy performance is not aligned with CDC Habitat and AMPERE Gestion's climate objectives, ambitious works programmes are scheduled based on the recommendations of thermal engineers who have systematically performed energy audits. These programmes seek to reconcile the following objectives:

- eradicating very poorly insulated buildings (with an F or G energy performance assessment label) by 2025;
- achieving energy efficiency commensurate with the French eco-label BBC Rénovation (average of 80 kWhEP/m²/year);
- reducing energy requirements by focusing on building façades/surfaces;
- deploying high-performance and efficient technical systems by systematically analysing the possibility of converting to heating that emits less greenhouse gases (e.g., gas to district heating or electricity);
- developing the use of renewable energy.

Therefore, during 2021, AMPERE Gestion commissioned various thermal engineering firms to perform 44 energy audits on residences whose current energy performance is not aligned with CDC Habitat group and AMPERE Gestion climate objectives.

The 44 buildings in question represent more than 1,650 housing units and have culminated in over €29 million worth of energy retrofit works programmes. The first Service Orders will be issued in 2022.

■ Case study

In 2020, one of AMPERE Gestion's funds acquired a portfolio of existing buildings located in the Paris region (667 units). A thermal engineering firm was mandated to audit the portfolio from an energy and environmental perspective.

When the audit was performed in H¹ 2021, the average energy performance of the portfolio was assessed as follows:

- **average energy consumption of 224 kWhEP/m²/year, corresponding to a D under the scale used in French energy performance assessments;**
- **greenhouse gas emissions average 47 kgCO₂/m²/year, corresponding to an E under the scale used in French climate performance assessments.**

These energy and environmental performances are not in line with the objectives of the French National Low Carbon Strategy (SNBC), in particular due to the absence of efficient insulation for the walls and inefficient joinery and technical equipment. Work programmes were therefore prepared by AMPERE Gestion and CDC Habitat technical teams to align building performance with AMPERE Gestion's energy and climate objectives.

Once finalised and approved by the fund investors, these programmes will make it possible to achieve the following performances:

- **average energy consumption of 98 kWhEP/m²/year, corresponding to a C under the scale used in French energy performance assessments: a 56% improvement on current performance (i.e., 224 kWhEP/m²/year) and 23% below the National Low Carbon Strategy target for 2030 (127 kWhEP/m²/year);**
- **average greenhouse gas emissions of 18 kgCO₂/m²/year, corresponding to a C under the scale used in French climate performance assessments: a 62% improvement on current performance (i.e., 47 kgCO₂/m²/year).**

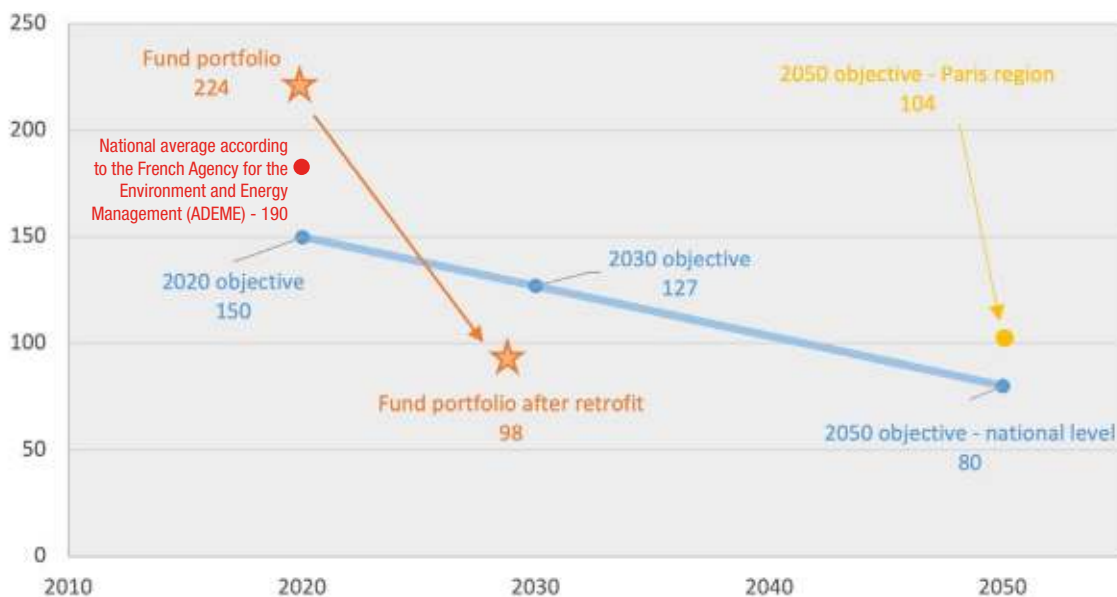
These retrofits will make it possible to achieve energy efficiency commensurate with the French eco-label BBC Rénovation at fund portfolio level (given that this fund only invests in buildings located in the Paris region, the target for 2050 corresponds to **104 kWhEP/m²/year**), and to align with the target set by the CDC Habitat group and AMPERE Gestion

in accordance with the National Low Carbon Strategy (SNBC, version 2017), which is aiming for a low-energy building portfolio by 2050.

The fund's projected energy path may therefore be represented as follows:

Energy path 2050 - SNBC version 2017

Energy performance in kWhEP/m²/an



- Energy path (SNBC 2017)
- Fund portfolio
- BBC Rénovation target
- National average according to the French Agency for the Environment and Energy Management (ADEME)

Lastly, conscious that energy efficiency is becoming a key tenant preoccupation and in order to cut its energy consumption still further, AMPERE Gestion is gradually beginning to track the current energy consumption of some of its funds and mandates, in partnership with Deepki, specialised in the collection of energy data in the real estate sector. To date, five funds representing 35% of assets under management have been set up on the Deepki application.

In accordance with AMPERE Gestion's SRI approach, actual energy consumption will be systematically compared to theoretical data taken from energy performance assessments in order to identify any variances *vis-à-vis* theoretical consumption and to plan awareness-raising measures and training for tenants.

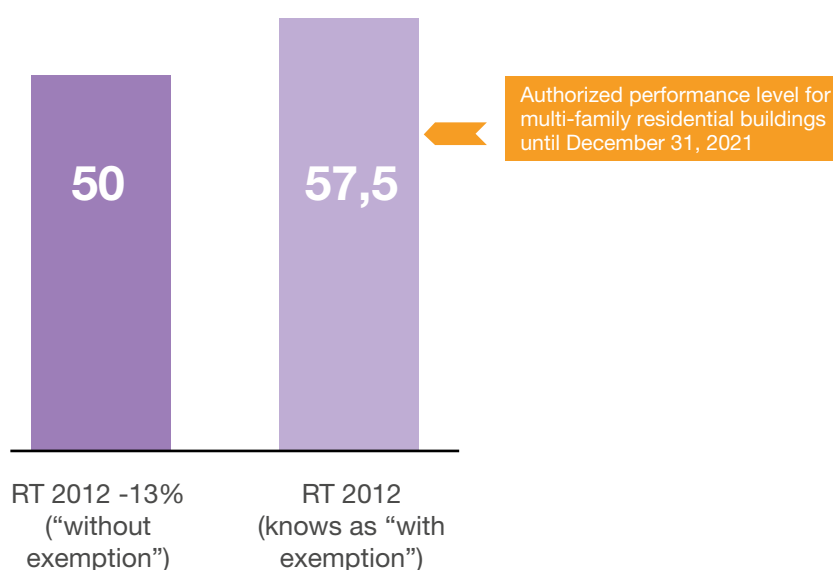
4.3 Actions undertaken in new buildings

As a company with a mission to serve the public interest and in order to meet the growing demand for housing in the most supply-constrained areas of France, CDC Habitat group acquires a large number of housing units from developers off-plan, particularly as part of large-scale partnerships. Conscious of the urgency of the climate issue and the role played by the real estate sector, since 2015, CDC Habitat group and AMPERE Gestion have targeted new operations that exceed French RT 2012 energy performance targets and the related exemption granted by the Government.

French RT 2012 energy performance regulations aimed to cap annual average primary energy consumption in new buildings at 50 kWhpe/m²/year. This cap is known as ‘Cmax’. Their implementation provided for a transition period during which consumption levels of new buildings may be 15% higher than the standard (this is known as “RT 2012 with exemption”, i.e., an average of 57.5k kWhEP/m²/year). The transition period was initially through end-2018 before being extended through end-2021.

The results of energy performance assessments of new operations acquired by AMPERE Gestion’s funds and mandates are as follows:

- 76% of new operations outperform RT 2012 energy performance regulations and actually comply with RT 2012 “without exemption” criteria¹¹.



¹¹ The funds and mandates covered by this analysis concern 81% of assets under management as at 31/12/21.

5

Alignment with biodiversity-related objectives

5.1 Disclosures concerning the strategy of alignment with long-term biodiversity objectives

Climate and biodiversity are constantly interacting. Fauna and flora ecosystems have a natural ability to adapt to their environment, however, nature needs time and global warming driven by human activity is accelerating so fast that certain ecosystems will not be given enough time. The current rate of biodiversity erosion is largely attributable to human activities, and urbanisation is one of the causes.

As players operating in the real estate sector, CDC Habitat and AMPERE Gestion are directly concerned by this issue and, after the imperative of reducing greenhouse gas emissions, adapting ecosystems to climate change is another key priority. In particular, this involves preserving agricultural, natural and forest areas. In 2015, CDC Habitat group deployed an avoidance-reduction-offsetting strategy aimed at preserving biodiversity against the impacts of construction activities.

5.2 Reducing negative impacts beginning in the design phase

Excessive growth on the urban periphery often leads to a loss of biodiversity, the destruction of agricultural land and a demand for infrastructures and services. To limit the impact on biodiversity, the CDC Habitat group has developed a decision-support application that makes it possible to measure the degree to which new construction projects contribute to urban sprawl.

The application is systematically used for each new building to qualify the features of a project in order to avoid contributing to the most deleterious effects of urban sprawl. This analysis examines three parameters: the development strategy, the previous use of the plot and the features of the construction project.

The results of urban sprawl assessments of new operations acquired by AMPERE Gestion's funds and mandates are as follows¹²:

- 92% of new developments have little or no impact on urban sprawl;
- 95% of new developments are located in the city centre or an existing part of the city.

Lastly, for the off-plan acquisition phase or where the Company is the project owner or prime contractor, CDC Habitat group has designed a Technical and environmental performance guide, which is sent out to all developer partners. To meet the future building operating requirements of CDC Habitat group, this guide, designed as a set of technical specifications, includes the main amenities expected in the building design phase, particularly biodiversity requirements based around the following:

- sloping areas, narrow and small surfaces will be filled with creeping plants (no lawns);
- larger areas away from paths may be laid out like flower meadows;
- shrubs and large flowerbeds should be limited in quantity and carefully situated;
- tall trees should be more than 5 metres from building facades.

Any lawns should be organised into zones and mowed using a differentiated approach based on proximity to buildings.

These environmental standards may be reinforced to develop more innovative solutions via the Biodiversity action plan currently being finalised by CDC Habitat in response to the new challenges of the housing sector.

5.3 Boosting positive impacts in the operating phase

In the operating phase, CDC Habitat group and AMPERE Gestion deploy initiatives to manage green spaces already present in the existing property portfolio in a sustainable manner and to enhance and reinforce nature at sites where it is lacking.

Initiatives to enhance the ecological potential of the portfolio and move towards positive biodiversity are as follows:

- maintenance contracts for sustainable management of green spaces that include differentiated approaches and a ban on synthetic chemical plant protection products that are dangerous for the environment and for secondary fauna;
- as much revegetation of impermeable/asphalt-covered outdoor spaces as possible to limit the urban heat island effect and encourage rainwater infiltration (parking areas, roofs, facades, etc.).

The characteristics of the outdoor spaces are available in CDC Habitat's IT tools based on vectorised residence floorplans.

Within the scope of AMPERE Gestion's funds and mandates, analyses of vectorised residence floorplans give the following results:

- 65% of residences whose plans are vectorised include permeable outdoor spaces (open green spaces, green roofs, etc.) that help to promote biodiversity¹³. This result represents a starting point for the Group's biodiversity strategy, whose objective will be to improve this percentage by gradually renaturing the most built-up residences most likely to suffer from urban heat island effects;
- making the services provided by nature accessible to our tenants, in particular by deploying dedicated training materials (booklets providing tips on eco-gestures focusing on biodiversity, support and awareness-raising initiatives, etc.);
- measuring the medium-term biodiversity footprint of AMPERE Gestion funds using an indicator such as the Global Biodiversity Score (GBS) and/or Biodiversity Performance Assessment (DPB / IBL).

¹² The funds and mandates covered by this analysis concern 71% of assets under management at 31/12/21.

¹³ The funds and mandates covered by this analysis concern 81% of assets under management at 31/12/21.

5.4 Contributing to research, learning and awareness-raising

Since 2016, the CDC Habitat group has been part of the Nature 2050 programme for companies wishing to make a voluntary financial contribution to projects whose objectives include:

- the restoration of wetlands;
- the creation of ecological networks;
- the transition of forest and agricultural areas;
- enhancing urban biodiversity.

Although the Group strives to limit its biodiversity footprint, particularly by combating urban sprawl, the majority of new construction projects involve a certain amount of soil sealing, thence the involvement of CDC Habitat group in this programme since 2016.



With the aim of sharing and pooling its experiences and skills with those of its partners, CDC Habitat group is also a member of the B⁴B+ club (Club of companies and financial institutions working towards positive biodiversity), launched in 2016 to co-develop and test the Global Biodiversity Score (GBS). The club's members pursue and reflect upon many objectives such as understanding how biodiversity footprint assessment tools can feed into investment decisions and the external reporting processes, and anticipating financial, regulatory and market developments concerning biodiversity footprint reduction.



Conscious of the urgency of the situation, in September 2021, CDC Habitat group and AMPERE Gestion signed the financial institutions' declaration for the COP 15 Convention on Biological Diversity. This statement, signed by over 70 financial institutions representing over \$10 trillion in assets under management, urges governments around the world to halt and reverse biodiversity loss, and calls for a realignment towards a nature-based economy that could potentially generate \$10 trillion every year in business opportunities and nearly 400,000 jobs by 2030. It reflects the link between climate change and biodiversity, encouraging all governments to develop a common policy approach that both achieves a level of greenhouse gas emissions in line with the objectives of the Paris Climate Agreement and strives to reverse the rapid decline in ecosystems and habitats.

6

Integrating ESG risks into the risk management process

This section rounds out EU regulations on sustainability-related disclosures in the financial services sector, namely Regulation (EU) 2019/2088 adopted by the European Parliament and Council on 27 November 2019, the Sustainable Finance Disclosure Regulation (SFDR).

This Regulation aims to enhance transparency and strengthen and standardise disclosure requirements for non-financial information, in particular through a policy for integrating sustainability risks into the investment decision-making process.

This document, which rounds out this section, is available in both French and English on the AMPERE Gestion website at:

[Declaration concerning the integration of sustainability risks in the investment decision-making process of AMPERE Gestion](#)

AMPERE Gestion's Socially Responsible Investment policy factors in environmental, social, and governance (ESG) metrics and the related risks that are specific to the residential housing sector.

Sustainability risks are integrated into AMPERE Gestion's risk management policy as part of SRI risks and focus on all of the Environment, Social and Governance criteria (ESG) covered by AMPERE Gestion's SRI policy.

SRI risks are integrated into risk management policy in the same way as financial, operational or compliance risk. The integration of sustainability risks in the investment decision-making process of the AIFs and mandates managed is based on a formally-documented methodology for analysing and evaluating ESG criteria factored into AMPERE Gestion's SRI processes.

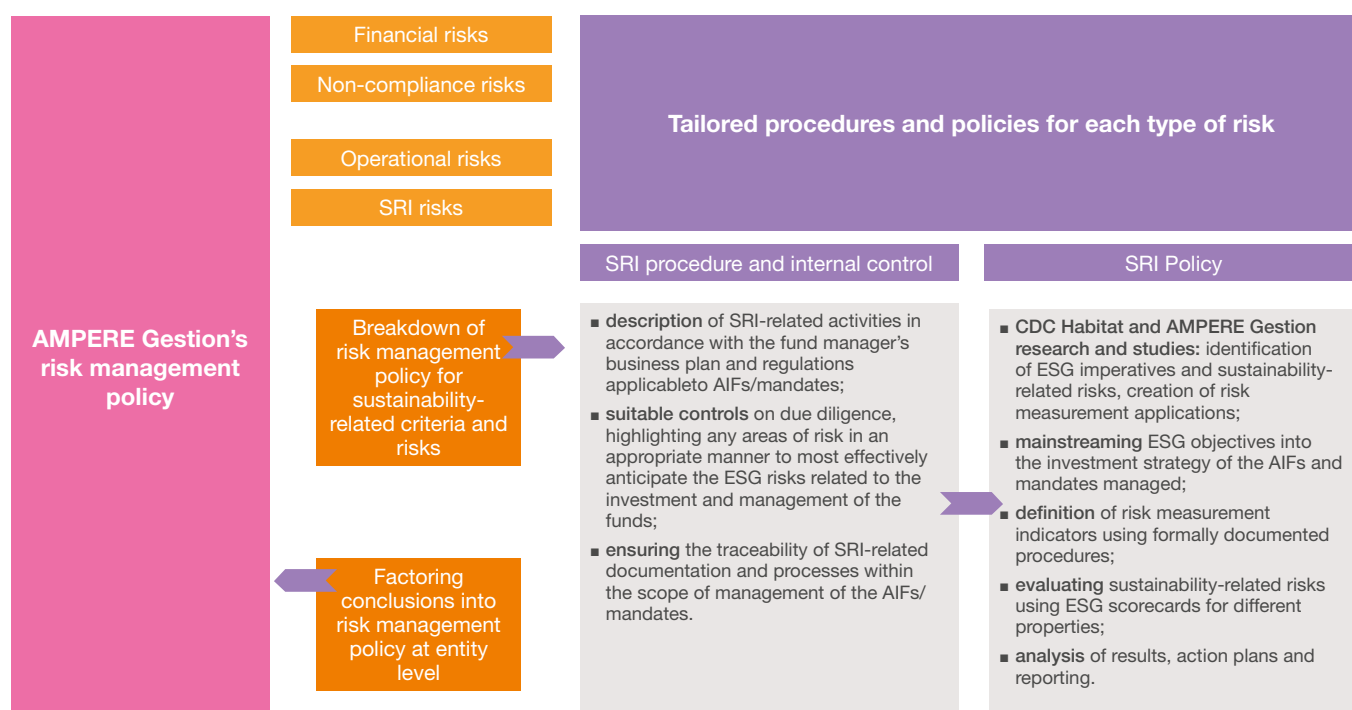
6.1 AMPERE Gestion’s risk management policy

AMPERE Gestion manages real estate investment funds for a number of AIFs and provides fiduciary management services for institutional clients. This activity involves the acquisition and direct or indirect management of a real estate portfolio and the management of the funds that own them.

Pursuant to the AIFM Directive which came into force in 2014 and makes the risk management function a key component of asset managers’ risk management and control systems, AMPERE Gestion has formally documented its risk management policy.

This policy outlines and explains the measures and procedures deployed by the management company to manage the risks to which it and/or the AIFs and mandates are exposed.

Sustainability risks are integrated into AMPERE Gestion’s risk management policy as part of SRI risks and focus on all of the Environment, Social and Governance criteria (ESG) covered by AMPERE Gestion’s SRI policy. SRI risks are integrated into risk management policy in the same way as financial, operational or compliance risk.



6.1.1 Risk management governance and organisation

AMPERE Gestion has set up a tailored governance structure:

- Executive Management is responsible for deploying the risk management process;
- the risk management function is organised around the Compliance Officer and line personnel;
- the Supervisory Board issues an annual opinion on the effectiveness and relevance of the risk management process.

The permanent risk management function forms the basis of AMPERE Gestion's risk management system. The function has two key missions: providing assistance for the operating units and executive bodies, and ensuring that the Company deploys robust and effectively applied processes.

The permanent risk management function is headed up by the Compliance Officer who works closely with portfolio management, the Finance and Treasury Management Director and the fund managers (operational functions).

In accordance with best practices, risks are managed on a number of levels within the Company:

- **first-tier controls:** performed on an ongoing basis by line personnel as they execute their day-to-day operations and duties. These controls or self-check procedures are designed to ensure that investment characteristics correspond to the investment criteria of the AIFs or mandates as outlined in the investment policies. Line management and line personnel are responsible for risks arising from the operations they process insofar as they are closest to investors and most familiar with clients and assets. They are also best placed for assessing certain risks. Clear processes and procedures, together with escalation procedures in the event of irregularities, are in place for operations performed by all line management and line personnel;
- **second-tier controls:** a risk monitoring, control and management system is deployed by the risk management function and overseen by the Company's Executive Management;

- **third-tier controls:** are periodic controls (internal audit) performed by CDC Habitat and Caisse des Dépôts et Consignations to check the robustness of AMPERE Gestion's system. In the absence of these periodic Group audits, AMPERE Gestion may also mandate an independent firm of outside auditors to perform a review of the process, in accordance with regulations. The results of the audits together with any problems, irregularities and recommendations, are submitted to AMPERE Gestion Executive Management and its Supervisory Board. The audits are also monitored by the Compliance Officer who ensures that any recommendations are implemented within the Company.

AMPERE Gestion has set up a Risk Committee chaired by the Compliance Officer. It meets at least half-yearly and meetings are attended by AMPERE Gestion Executive Management, the Treasury Management Director and a representative from the CDC Habitat group compliance and audit function. Other people may be convened on an as-needed basis (managers, line personnel, etc.).

The following are examples of matters that may be discussed at Risk Committee meetings:

- ratio monitoring and any alerts generated during the period ended;
- monitoring of risk thresholds applicable to investment vehicles: counterparty, market and liquidity risk;
- results of any stress tests performed by the operational functions;
- general compliance with risk management policy guidelines (compliance of each AIF or mandate with risk thresholds, match between the risk profile and the level of risk, etc.);
- review of risk management procedures and policies and risk mapping;
- monitoring of the Company's equity and operational risks;
- any problems, irregularities or incidents during the period ended;
- any other matters related to the Company's business.

Formal minutes of the Committee's meetings are drawn up, sent to all participants and archived on AMPERE Gestion's IT network in a specific file.

6.1.2 Specific applications for sustainability-related risks

In May 2020, AMPERE Gestion drew up a formally-documented SRI procedure setting out SRI-related activities in compliance with contractual regulations applicable to AIFs/mandates. This procedure also describes controls on appropriate due diligence, highlighting any areas of risk in an appropriate manner to most effectively anticipate the ESG risks related to the investment and management of the AIFs/mandates.

Compliance with this procedure is ensured by formally documenting first-tier controls performed by line personnel.

The Compliance Officer is tasked with carrying out second-tier controls to ensure the consistency and compliance of the SRI processes. In particular, they check the continuity of the methods and applications used to ensure the consistency of the process over time. They give their opinion on possible changes to the system and recommend informing the investors concerned when this appears necessary in accordance with transparency and disclosure principles.

SRI risk indicators are incorporated into the risk maps of each AIF/mandate. SRI risk indicators for each AIF/mandate are tracked in half-yearly risk reports. These composite indicators reflect sustainability-related risks for residential assets in an appropriate form.

If necessary, third-tier controls are performed by an independent firm of consultants or by the Group on a multi-annual basis.

6.2 Process for identifying, assessing, ranking and managing the risks arising from the integration of environmental, social and governance criteria

The integration of sustainability risks in the investment decision-making process of the AIFs and mandates managed is based on a formally-documented methodology for analysing and evaluating ESG criteria factored into AMPERE Gestion's SRI processes.

This methodology is designed to evaluate the non-financial performance of the real estate portfolio and, at the level of each AIF/mandate, assess the degree to which the ESG objectives factored into investment strategy have been achieved.

Based on the ESG metrics analysed within the scope of this methodology, many sustainability-related risks are assessed and factored into investment decisions, particularly energy consumption (<https://amperegestion.groupe-cdc-habitat.com/wp-content/uploads/sites/2/2021/01/SRI-Policy-AMPERE-Gestion-ENG.pdf>, greenhouse gas emissions, the availability of public transport, and contribution to urban sprawl).

When the analysis makes it possible to identify sustainability-related risks – be they physical or transition risks – (pre-investment or during the asset operation phase), a risk mitigation plan is drawn up that includes a list of actions to be deployed, the deployment timeline and potential financial impacts on the AIF/mandate business plan. Therefore the potential impacts on asset yields of the risks actually occurring is factored into the assessment from the outset.

6.2.1 Processes for analysing and identifying ESG criteria and sustainability-related risks

As part of its SRI policy, AMPERE Gestion has deployed a standardised and systematic evaluation process – unless the investment fund or mandate strategy excludes taking this risk into account – based on a decision taken by the investors, common to all investment opportunities prior to presentation to the Pre-investment and Investment Committee.

The scorecards are structured around the six pillars of CDC Habitat’s CSR strategy and AMPERE Gestion’s SRI policy, namely Environment, Social, Societal, Tenants, Suppliers and Governance. These pillars are split into 19 CSR commitments.

The metrics that appear on the scorecards are based on the CDC Habitat CSR strategy materiality matrix and are considered of key importance to AIFs and mandates.

The metrics and related risks may be common to all underlying assets and AIFs/mandates because they are inherent to construction and real estate asset management generally, such as the consideration of climate risk and biodiversity or tenant comfort and building quality. They may also be specific to the fund’s underlying assets (intermediate housing, open market housing, managed senior residences, managed student residences, care homes for the elderly, or medical social services facilities).

These metrics are identified based on research and studies carried out by AMPERE Gestion and CDC Habitat teams, particularly the Energy and Environmental Strategy and Analysis and Research teams working for the CDC Habitat group Property Portfolio division. Assessment indicators also draw on tailored, formally documented applications created by CDC Habitat and deployed throughout the portfolio.

The following table presents all of the ESG metrics used in the identification process and assessed during the acquisition and/or management phase:

AMPERE GESTION'S SRI POLICY	N°. of focus / challenge	ESG rating Acquisition-side	ESG rating Management-side
ENVIRONMENT	I.		
Energy consumption throughout the property portfolio and climate change	1.1	yes	yes
Water consumption throughout the property portfolio	1.2	yes	yes
Biodiversity	1.3	yes	yes
Waste management and the circular economy	1.4	yes	yes
SOCIAL	II.		
Health and safety of occupants and personnel	2.1	yes	yes
Environmental climate and social risks	2.2	yes	yes
GOVERNANCE	III.		
Anti-money laundering and countering the financing of terrorism (ALM/CFT)	3.1	yes	yes
Fight against corruption and preventing conflicts of interest	3.2	yes	yes
ESG strategy	3.3	yes	yes
SOCIETAL	IV.		
Meeting local and regional development needs	4.1	yes	yes
Social and functional diversity	4.2	yes	no
Mobility	4.3	yes	yes
TENANTS	V.		
Quality of living environment	5.1	yes	yes
Comfort and wellness	5.2	yes	yes
Accessibility for people with reduced mobility (PRM)	5.3	yes	yes
Service quality	5.4	no	yes
Housing opportunities	5.5	no	yes
Participative or collective approach	5.6	no	yes
SUPPLIERS	VI.		
Responsible procurement	6.1	yes	yes

AMPERE Gestion is completely in phase with the strategic objectives of CDC Habitat in terms of mitigating global warming and climate change adaptation.

■ Transition risk related to mitigating global warming

CDC Habitat has adopted an Energy Strategy Plan (ESP) based on high energy performance and the development of renewable energies.

The ESP aims to cut the energy consumption of housing units through smart bioclimatic design, to deploy efficient systems that limit the quantities of energy required to meet tenants' needs and develop renewable energies in an ambitious but realistic manner.

Renovation of the existing housing portfolio: the least energy efficient part of the portfolio (F or G energy label) will be subject to an energy retrofit programme by 2025.

Energy performance of new buildings: collective housing is exempted from energy performance regulations until French Environmental Regulation 2020 (RE 2020) comes into effect. This authorises energy consumption of 15% above the regulatory threshold. However, in recognition of the urgency of the climate issue and its role in limiting carbon emissions, for certain funds and mandates managed, AMPERE Gestion has opted not to avail of this exemption and to comply with French RT 2012 energy performance regulations. The strategy also focuses on gradually moving towards systematic certification for programmes acquired off-plan.

In the portfolios of AIFs and mandates managed by AMPERE Gestion, these objectives are tracked using specially adapted indicators and integrated into the building evaluation methodology.

■ Physical risks related to climate change adaptation

AMPERE Gestion is fully committed to CDC Habitat's Climate change adaptation plan. In 2019, CDC Habitat group launched a study to passively improve thermal comfort in buildings during the summer months by 2050. In practice, this consists in immersing new buildings built to current French RT 2012 energy performance regulations in the climate of 2050 based on three scenarios advanced by the IPCC. The study encompasses a number of regions in France and in French Overseas Departments. Buildings' capacity to provide thermal comfort in summer was analysed and actions proposed to ensure and maintain an acceptable level of comfort without systematic recourse to air conditioning.

In 2020, CDC Habitat mapped the exposure of its housing portfolio to climate hazards and performed a Resilience Performance Assessment on an individual building scale to assess the resilience of the part of the portfolio identified as vulnerable. The comprehensive climate risk exposure mapping process through 2050 will be completed in the medium term for the purpose of scheduling any work that needs to be performed. Recommendations will also be incorporated over time into the technical specifications of construction and renovation work with the overriding objective of protecting tenant safety and quality of life.

■ Physical risks related to preserving biodiversity

AMPERE Gestion is completely in phase with CDC Habitat's commitment to preserving biodiversity.

CDC Habitat group strives to limit the contribution of its new buildings to urban sprawl to avoid soil sealing and damaging biodiversity. The urban sprawl indicator – calculated for all new developments – factors in the location of the site, its previous use and proximity to transport amenities. It is presented to the Group Commitments Committee and is a determining factor in whether or not the project is selected.

Lastly, CDC Habitat deploys initiatives to manage its green spaces in a responsible manner:

- in the existing property portfolio, every time a service contract comes up for renewal, it includes a sustainable management contract for green spaces that makes it possible to transition from a traditional to a pro-biodiversity approach;
- the Group’s aim is to gradually begin obtaining the Ecojardin label for its green spaces, focused on ecological management and continuous improvement in seven areas: site planning, soil, water, fauna and flora, furniture, materials, equipment & machinery, employee training and fostering public awareness.

The “**Developing shared spaces**” handbook provides advice for creating and maintaining shared spaces, based on an analysis of existing case studies. Lastly, in 2019, CDC Habitat launched a training programme – “**Biodiversity-driven management**” – intended for its local employees who are tasked with ensuring that service providers comply with the fresh management approach that is a feature of new service contracts. It aims to teach local management teams about urban fauna and flora, involving them in an eco-friendly approach to site maintenance, giving them the tools and the arguments to answer tenants’ questions about changes in how their green spaces are being managed, and guaranteeing the sustainability of actions and an eco-friendly approach to upkeep.

In the portfolios of AIFs and mandates managed by AMPERE Gestion, these objectives are tracked using specially adapted indicators and integrated into building evaluation methodology.

6.2.2 Processes for assessing ESG criteria and related sustainability risks

Scorecards are standardised and objective tools used to make like-for-like comparisons between assets and to compare AIFs and mandates managed by AMPERE Gestion on an equal basis. The asset’s ESG rating resulting from the unchanging evaluation process is then examined in light of the SRI strategy of each AIF/mandate (ESG objectives, selection strategy established (or not) based on a minimum ESG score for the AIF/mandate in question).

To ensure that the evaluation process is relevant to the ESG issues inherent to each class of asset, scorecards are broken down by asset type, i.e., intermediate housing, open market housing, managed senior residences, managed student residences, medical social services facilities or care homes for the elderly. Assets are therefore rated using the scorecard corresponding to their typology.

At acquisition, once the non-financial characteristics have been identified, buildings are integrated into the SRI scorecard, which is used to calculate an overall ESG rating. The same standardised and systematic evaluation process is applied to all investment opportunities before they are presented to the Pre-investment and Investment Committee. All assets are systematically valued using the standardised scorecard that corresponds to their residential housing typology, independently of the AIF/mandate to which they will subsequently be allocated after the Investment Committee meeting. This enables each asset to be positioned in its own investment universe. Attribution of the ESG rating is mandatory prior to presentation to the Committee and is checked by AMPERE Gestion’s Compliance Officer. Both the ESG ratings and the Compliance Officer’s control sheets are an integral part of the file submitted to the Pre-investment and Investment Committee.

During the buildings’ operational phase, the data needed for the evaluation is collected by AMPERE Gestion with the operational input and assistance of CDC Habitat, or else entrusted by AMPERE Gestion to CDC Habitat as part of an assistance and advisory services or rental management services agreement on behalf of the AIF/mandate.

The collection of ESG data is tracked by the dedicated SRI teams and by the fund manager within the scope of formal exchanges with CDC Habitat at meetings and/or committees that discuss the AIF/mandate’s SRI focuses. The ESG data collected is subsequently incorporated into the asset scorecards by the SRI teams who perform the following missions:

- analysis of individual indicators and the asset’s overall ESG rating,;
- comparison with prior-year results, if relevant;
- comparison with the AIF/mandate objectives formally documented in the SRI strategy;
- consolidation of individual indicators at AIF/mandate level.

The indicators used are intended to measure the metrics to which they relate in an effective manner and they are devised with this purpose in mind. For each asset type and assessment basis (acquisition or management), the exhaustive list of indicators appears in the ESG scorecard matrices (see attached). The scorecards are also appended to AMPERE Gestion’s SRI policy.

For assets with a recognized risk (e.g., presence of asbestos or lead), works budgets are prepared and integrated into the business plan for the building and the AIF/mandate. Therefore, sustainability risks are integrated into the investment decision-making process to help mitigate adverse impacts and how they affect the value of buildings.

	Type of due diligence	Indicator	Current score	Weighted current score	Expected performance	Achievable score	Weighted achievable score	Target performance	CAPEX
1	ENVIRONMENT								
1.1	Energy consumption throughout the property portfolio and climate change								
1.1.a	Acquisition	Energy efficiency							
1.1.b	Acquisition	Greenhouse gas emissions							
1.1.c	Acquisition	Renewable energies							
1.1.d	Acquisition	Certification (carbon)							
1.2	Water consumption throughout the property portfolio								
1.2.a	Acquisition	Technical processes for reducing water consumption							
1.2.b	Acquisition	Certification (water)							
1.3	Biodiversity								
1.3.a	Acquisition	Urban sprawl							
1.3.b	Acquisition	Certification (biodiversity)							
1.3.c	Acquisition	Deployment of pro-diversity programme							
1.3.d	Acquisition	Location in an eco-neighbourhood							
1.4	Water management and the circular economy								
1.4.a	Acquisition	Managing household waste							
2	SOCIAL								
2.1	Health and safety of occupants and personnel								
2.1.a	Acquisition	Personal healthy and safety and security policy							
2.2	Environmental climate and social risks								
2.2.a	Acquisition	Climate risks at local level							
2.2.b	Acquisition	Controlling environmental impacts of building work							
2.2.c	Acquisition	Asbestos - Performance assessment and mapping							
2.2.d	Acquisition	Asbestos - Treatment							
2.2.e	Acquisition	Lead - Performance assessment							
2.2.f	Acquisition	Lead - Treatment							
2.2.g	Acquisition	Radon risk							
3	GOVERNANCE								
3.1	Anti-money laundering and countering the financing of terrorism (AML/CFT)								
3.1.a	Acquisition	AMPERE Gestion -AML/CFT process							
3.1.b	Acquisition	Seller-side AML/CFT analysis							
3.2	Fight against corruption and preventing conflicts of interest								
3.2.a	Acquisition	Declaration of benefits and business relationships, preventing conflicts of interest - AMPERE Gestion							

AMPERE Gestion

AMPERE Gestion, a subsidiary of CDC Habitat, is a portfolio management company accredited by the French financial markets authority (Autorité des marchés financiers – AMF).

After setting up its first regulated investment vehicles dedicated to intermediate housing it has now developed a complementary real estate investment offering. AMPERE Gestion is committed to Socially Responsible Investment and factors ESG criteria into its investment and fund management strategy. It has signed up to the UN-sponsored Principles for Responsible Investment (PRI) which seek to promote Environment, Social and Governance criteria in investment decisions. AMPERE Gestion undertakes to report on its compliance with these principles in its investment strategy as part of a comprehensive annual reporting process that includes a publicly-disclosed rating.

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