



# **ESG** Integration Policy

# **Thematics Asset Management**

Scope: Global [100% of assets under management]

Last policy update: Dec 2023







### **Summary of changes**

The process refinement adopted in this update is focused on strengthening our commitments to results, in particular on key areas. We also refined the document for language clarity and providing more granularity on the scope of the approach, as well as ensuring consistency of the content this policy with other public documents relating to Thematics AM' strategies, such as the Prospectus and other pre-contractual documents. The following are adopted effective 01 January 2024:

- 1. Binding performance commitment on GHG Intensity: Climate risk management and transition to net-zero is integrated into our investment decision through various approaches, including in ESG Integration, where one of the key criteria we assess companies' performance is on climate resilience. In line with this material issue, our performance commitment is to outperform the GHG intensity (WACI) of the portfolio's reference universe (investable universe). This criterion applies to all our Article 9 strategies (Water, Wellness, and Safety).
- 2. Binding performance commitment on Board gender diversity: Board diversity is also systematically accounted for in our sustainability assessments through our ESG Integration, voting, as well as engagements. Our goal is to actively promote good governance in the management of companies. In our effort to ensure tangible results are achieved in this issue, we make it our binding commitment to outperform the Board gender diversity of the portfolio's reference universe. This criterion applies to all our Article 9 strategies (Water, Wellness, and Safety).

# **ESG Integration in Thematics AM's responsible investment strategy**

To achieve the sustainable investment objectives or to attain the ESG characteristics of its strategies, Thematics AM embeds Responsible Investment across the end-to-end investment process.

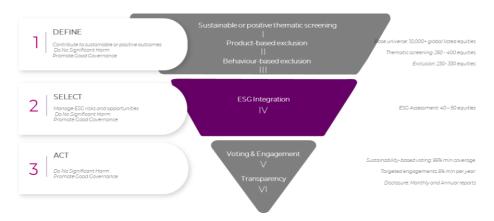
Thematics AM Responsible Investment Framework incorporates the following approaches:

- Sustainable or positive Thematic screening
- Product-based exclusion
- Behaviour-based exclusion
- ESG Integration
- Voting & Engagement



The approaches are applied across the three phases of the investment process of Thematics AM: Define, Select and Act - when we define the theme, its boundaries and the securities to comprise the investable universe, during the security selection for the portfolio, and post-investment. These approaches are implemented in all Thematic Strategies systematically and through binding elements.

The **ESG Integration** approach of systematically integrating the different ESG risks and opportunities companies are exposed to is carried out in the Select Phase, following the definition of the thematic scope and boundary and the investable universe:



Thematics AM responsible Investment Framework

#### Define

At the first stage of our investment process, we 'Define' our theme, its associated boundaries and ultimately the investable universe for the strategy. We set boundaries around what can and can't be considered appropriate for the strategy in question. We also apply product-based and behaviour-based exclusionary criteria at company and strategy level in order to minimise adverse impacts recognising that even companies in positive thematic areas could have an adverse impact on society or the environment.

#### Select

At the second stage of our investment process, we 'Select' companies that are suitable for investment. ESG Integration is central at this stage. Our proprietary ESG scoring framework is used to assess the environmental, social, and governance risks and opportunities exposure of a security. It aims to mitigate potential ESG risks should they materialise, and to maximise the value created through the ESG focus.

#### Act

The third phase defines how we 'Act', in terms of sizing positions within the portfolio, and how we actively manage those positions. 'Position Sizing' is defined using thresholds that take



ESG scores into consideration. Finally, 'Engagement' with companies on ESG issues and 'Voting' are core elements of our active ownership and engagement approach.

## Systematic integration of ESG risks and opportunities

Responsible investment is one of the 4 "pillars" of our investment philosophy, alongside the emphasis on secular growth opportunities, focusing on our investment themes and adopting an unconstrained approach.

- Emphasis on secular growth, which is derived from the primary forces of Technology,
   Demographics, Globalization and Scarcity that are causing the "tectonic" shifts shaping tomorrow's world and affecting companies as well as the flow of money
- Investment themes, where we look only in targeted segments of the enjoying long-term secular growth underpinned by structural and long-lasting forces
- Unconstrained approach, with our forward-looking, benchmark-agnostic, diversified, and with global equity exposure.
- Responsible Investment, which is integral to reducing risks, that include sustainability
  risks, as well as to creating long-term value for our investors and for society.

We believe that material Environmental, Social and Governance factors have an overall impact on a company's bottom line, both in the short and/or long-term and that ESG integration leads to better-informed investment decisions. Integrating sustainability risks and factors in our investment process is employed to manage operational, financial, and reputational risks and deliver excess returns to fulfill our fiduciary duty.

At Thematics AM, Responsible Investment means also assessing how our investments contribute to accelerating the transformation of the economy and moving society towards a more sustainable model. It also means taking care of the company's human resources, minimising negative impact of operations to the environment and natural ecosystem; these approaches contribute to long term value creation and, in the end, benefit the business, the employees, the society and the economy.

While there is still an absence of globally defined and accepted ESG assessment standards, Thematics AM has developed its proprietary ESG scoring framework guided among others by existing materiality frameworks, such as but not limited to, Sustainability Accounting Standards Board (SASB) and Global Reporting Initiative (GRI).



# **Our proprietary ESG Scoring Methodology**

#### ESG Scoring framework

Thematics AM proprietary ESG scoring framework is composed of targeted and focused sets of metrics it deems most material to its range of thematic strategies and are aligned with the double materiality concept.

- the most material sustainability risks that could translate to notably financial and reputational risks if unmanaged and the most material opportunities that companies are exposed to, linked to the nature of their activities; and
- 2. the most material environmental and social areas where companies could have adverse impact, due to the nature of their activities

When assessing the different criteria, our objectives are:

- On the Environmental side, to make sure the company will keep its license to operate by managing material environmental risks it is exposed to
- On the Social side, to confirm the company is getting community consent (employee, suppliers, clients, and regulators)
- On the governance side, to maintain strong management and protect minority shareholders' interest.

This aligns with the concept of double materiality as defined by the regulations. It encourages a company to judge materiality from two perspectives: 1) "the extent necessary for an understanding of the company's development, performance and position" and "in the broad sense of affecting the value of the company"; 2) environmental and social impact of the company's activities on a broad range of stakeholders. The concept also implies the need to assess the interconnectivity of the two.

The result of the ESG integration approach is a total ESG score that carries an equal weight (25%) as other investment criteria (Quality, Trading Risk, and Management) and will impact the security's inclusion and final weight of the investment.





Thematics AM Investment Scoring Framework

#### Material ESG Metrics

The Portfolio Managers assess individual companies across the 11 different material ESG indicators drawing from a range of resources, including desktop research, company engagement, and ESG ratings from at least two third-party rating agencies (ISS and Sustainalytics).

#### **Environmental**

- Climate change resiliency
- Effluents and waste management
- Environmental impact of products and services

#### Social

- Staff and suppliers' health and safety
- · Labor practices
- Society and product responsibility
- Data privacy

#### **Governance**

- Executive compensation
- · Quality of the Board
- Shareholder rights, poison pills
- Business ethics

The methodology developed by Thematics AM is based on the following steps:

- Portfolio Managers set the level of materiality for each of the 11 ESG indicators at fund level ("Weighting of Material ESG Metrics")
- Portfolio Managers then conduct a systematic ESG assessment and assign an individual ESG score to the companies across the 11 ESG indicators
- This score is then combined with the weight of the ESG indicators to take into account
  the materiality of the ESG Indicators and this process result in a binary score of 0 or 1
  for each company ("Company level Scoring")



• This last score is used to calculate an overall score integrating the 4 investment criteria ('ESG', 'Quality', 'Trading risk', 'Management') and which will determine the weight of the company in the portfolio ("Position sizing")

#### Weighting of Material ESG Metrics at Fund Level

Whilst we acknowledge the interconnected nature of environmental, social, and governance factors, it is our view there are specific topics and criteria which are more material than others depending on the business models, the geographies or the industries involved. To account for this, Thematics AM's framework sets the level of materiality for each of the 11 ESG indicator at fund level. The weighting is assigned at subsegment and categorised as either high or medium (2 or 1, respectively). The weight designation is primarily guided by the Portfolio Managers expertise and knowledge of sectorial business models, while also accounting for existing materiality mapping, such as that of the SASB.

ESG Factors with the highest materiality are assigned a 'weight' of 2. Factors that are assessed to have medium materiality are assigned a 'weight' of 1.

See the graphic below for illustrative purpose.

Risk Mapping - Water Fund			Environment			Social				Gove	an course			
				Environment	Staff and								THEMATICS	
		Climate	Effluents and	al impact of	supplier's		Society and		Executive		Shareholders			
		change	waste	products and	health and	Labor	product		compensatio	Quality of	rights and	Business		
		strategy	management	services	safety	practice	reponsibility	Data privacy	n	the Board	poison pills	ethics	TAM Score	Segment
Demand efficiency	Consumers	1	2	2	2	1	2	1	1	1	1	1	1,36	17,49
	Industrials	2	2	1	2	1	1	1	1	1	1	2	1,36	13,39
	Agriculture	1	2	2	1	1	1	1	1	1	1	2	1,27	0,09
	Distributors	1	1	1	2	2	1	2	1	1	1	1	1,27	10,89
Pollution control	Monitoring	1	1	1	1	1	1	2	2	1	1	1	1,18	16,89
	Waste	1	2	2	2	2	2	1	1	1	1	2	1,55	7,39
Water infrastructure	Regulated Utes	2	2	2	2	2	2	1	1	1	1	2	1,64	13,19
	Concessions	2	2	2	2	2	2	1	1	2	2	2	1,82	9,49
	Technologies	2	2	1	1	1	1	1	1	1	1	2	1,27	9,49
	Total	1,46	1,72	1,48	1,73	1,42	1,48	1.28	1,17	1,10	1,10	1.54	1,41	

Illustrative materiality weighting at fund level, Thematics Water Fund;

This weighting at Fund level will then be used to calculate the total ESG score for a company at Fund level.

#### Company level scoring

Portfolio Managers conduct a systematic ESG assessment of companies before they decide to invest. They score individual company across the 11 material ESG indicators, each of which is composed of multiple sub-indicators or sub-themes, as indicated in the table below.

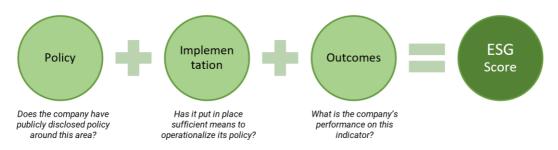
Environmental	Scope
Indicators	
Climate change resiliency	Management of climate risks and opportunities   Decarbonization pathway   GHG reduction program   GHG disclosure   Energy management



Effluents and waste	Hazardous waste management   Solid waste management
management	Effluents management   Toxic emissions management
Environmental	Resource – use   Eco-design   Product life cycle assessments
impact of products	Circularity   Impact to nature   Green building   Green Procurement
and services	Water management
Social	
Staff and suppliers'	Employee safety   Contractor safety   Accident prevention programs
health and safety	Human rights protection
Labor practices	Labour protection   human capital development   Diversity and
	inclusion   Freedom of association and collective bargaining
Society and product	Nutrition & Health programs   Product & Service Safety   Product
responsibility	sustainability   Responsible Marketing
Data privacy	Data protection and information security   Customer protection
	Cybersecurity
Governance	
Executive	Performance based incentives   Transparent remuneration policy
compensation	
Quality of the Board	Board Experience  Key Committee effectiveness   Diversity
	Independence   Shareholder engagement and responsiveness
	Board structure
Shareholder rights	Poison Pill & Takeover Defences   Ownership structure   Director
	Appointment & Removal
Business ethics	Bribery & Corruption   Lobbying   Political Involvement   Whistle-
	blower programme

Scope of each material ESG Indicators

Portfolio Managers' analyses focus on 3 key pillars – Policy, Implementation, Outcome.



Thematics AM Company-level scoring



In the course of their analyses, Portfolio Managers are guided by an Internal ESG Scoring Guidance, a document providing minimum criteria in scoring, as well as a set of common questions.

Portfolio Managers base their opinion on public documentation and third-party data. If necessary, Portfolio Managers complete their analysis via a discussion with the company management and additional documentation provided by the company. They also exchange analyses on specific matters with equity 'sell-side' brokers/salespeople.

The output of this process is a score of individual company across 11 material ESG indicators. To arrive at the final company ESG score, these are multiplied by the indicator weights designated above. See illustration below for a fund level score view.

Company Scoring - Water Fund		Environment			Social								
		Climate change strategy	Effluen ts and waste manag ement	mental impact of product s and services	Staff and supplier's health and safety	Labor practice	Society and product reponsib ility	Data privacy	Executiv e compen sation	Quality of the Board	Shareho Iders rights and poison pills	Busines s ethics	TAM Score
Company 1	Consumers	1	1	2	1	0	0	1	1	1	0	1	50,02
Company 2	Concessions	Ö	1	1	1	0	1	1	1	i	0	Ö	31.8%
Company 3	Concessions	0	2	2	1	0	ó	1	1	i	0	0	36,4
Company 4	Concessions	1	1	2	1	0	1	1	1	Ö	0	1	50,0
Company 5	Concessions	1	2	2	1	0	1	1	1	1	0	Ö	50,0%
Company 6	Concessions	1	2	2	1	0	1	1	1	i	0	0	50,0%
Company 7	Industrials	1	1	1	1	1	Ö	1	Ö	<u> </u>	1	1	37,5
Company 8	Monitoring	0	i	2	1	1	2	1	1	1	1	1	60.0
Company 9	Monitoring	1	1	2	1	1	2	1	Ö	<u>.</u>	1	1	55,0
Company 10	Monitoring	1	1	2	2	1	2	1	0	1	1	1	65,0
Company 11	Industrials	1	1	2	1	1	1	1	1	i	1	1	62,5
Company 12	Technologies	1	1	2	1	1	1	1	1	Ö	1	1	53,8
Company 13	Technologies	1	1	2	1	1	1	1	1	2	2	1	65,4
Company 14	Distributors	Ö	1	1	Ö	Ö	1	1	1	1	1	1	40,0
Company 15	Industrials	1	i	2	1	1	1	1	1	i	0	1	62,5
Company 16	Consumers	1	1	1	1	1	1	1	1	i	0	1	50.0
Company 17	Technologies	1	1	2	0	Ö	1	1	1	<u> </u>	1	2	50,0
Company 18	Regulated Utes		2	2	1	1	2	1	1	2	1	0	70,8
Company 19	Distributors	1	1	1	1	1	1	1	1	1	2	2	58,3
Company 20	Consumers	0	Ö	2	0	0	1	1	2	<u> </u>	2	1	54,2
Company 21	Consumers Waste	0	1	2	1	1	1	1	1	<del>-</del>	1	1	50,0
Company 22	waste Consumers	1	+	1	1	1	1	1	1	2	2	1	57,1
Company 23	Distributors	0	1	2	1	1	1	1	1	1	1	1	58,3
Company 24			2	2	1	1	2	1	1	- '	1	1	66,7
	Regulated Utes	1	1	2	2	1	2	1	0	2	1	1	70,0
Company 25 Company 26	Monitoring Industrials	2	1	0	2	2	1	1	1	2	1	1	50,0
Company 27	Industrials Waste	1	1	2	1	1	1	1	1	0	1	1	56,3
		2	1	2	1	1	1	1	1	1	1	1	62,5
Company 28 Company 29	Industrials Monitoring	1	2	2	2	1	2	0	0	- 0	0	0	65,0
Company 23 Company 30	_	1	1	1	1	1	1	1	1	1	1	0	50,0
Company 31	Monitoring Consumers	1	1	1	1	1	1	1	1	2	0	1	57,1
Company 32	Lonsumers Distributors	0	1	1	2	1	1	1	1	2	1	1	55,0
		1	1	1	1	1	1	1	1	1	1	1	50,0
Company 33	Industrials	1	1	2	1	1	1	1	1	0	0	1	
Company 34	Consumers	0	1	0	1	1	1	1	1	1	1	1	50,0
Company 35	Consumers	1	1	2	1	1	2	1	2	1	1	1	42,9
Company 36	Monitoring				I					ı			70,0:

Illustrative ESG scoring, Thematics Water Fund

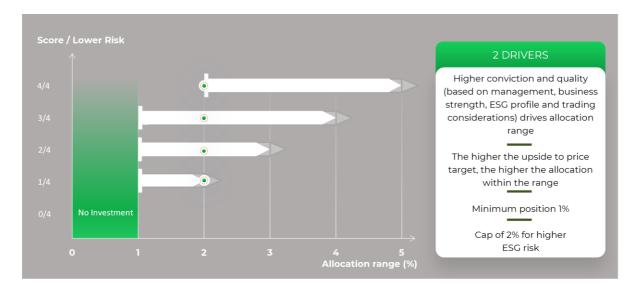


In order to calculate an overall score at the company level, final company ESG score is translated in a binary score (an ESG score above 50% is set at 1 while an ESG score below or equal to 50% is set out at 0).

With the binary scores of companies across the four investment criteria - 'ESG', 'Quality', 'Trading Risk', 'Management' – each equally weighting 25%, Portfolio Managers proceed to the position sizing based on their qualitative and quantitative assessment.

- An overall score of 4 implies a range of 2%-5%
- An overall score of 3 implies a range of 1%-4%
- An overall score of 2 implies a range of 1%-3%
- An overall score of 1 implies a range of 1%-2%

The target weight of the position within the range will be driven by the potential valuation upside identified by the Portfolio managers.



Position sizing allocation range

#### Resources used to undertake ESG analysis

The data used to form an overall opinion on a company is a synthesis of outputs that come from a combination of some or all of the following:

- PM's network of contacts from the broader relevant industry
- Equity sell-side analysts and research documents,
- Third party sustainability data providers, including
  - a. Institutional Shareholder Services (ISS)



- b. Sustainalytics
- c. S&P Global Trucost
- d. MSCI
- e. CDP
- f. Bloomberg

#### Selectivity - binding outcomes

#### 3. ESG Score

ESG Integration through our proprietary ESG Scoring is primarily employed to account for the material environmental, social, and governance risks and impacts of our investments, and to size the positions within the portfolio. To ensure the effective implementation of the ESG integration approach at the portfolio level, we monitor the selectivity of the process vs the investable universe or the reference index, based on the weighted average score (which means we do not necessarily exclude the lowest rated companies, but overall, we are exposed in the portfolio to better ones than the average of the investable universe).

- All strategies (except Europe Selection): Our binding commitment is to permanently achieve at the portfolio level a better ESG rating than the investable universe on a 3-month rolling basis, after eliminating at least 20% (in weight) of the worst rated securities of the latter.
- ii. Thematics Europe Selection: the strategy differs in its approach, as for this specific strategy, we exclude the 20% (in weight) of the worst rated companies of the investable universe.

As securities which are not held in the portfolios are not scored by Portfolio Managers, Thematics AM calculates the ESG rating of the strategy and the investable universe based on third-party data, which have to provide at least a coverage of 90% of both the universe and the strategy.

#### 4. GHG Intensity

Climate risk management and transition to net-zero is integrated into our investment decision through various approaches, including in ESG Integration, where one of the key criteria we assess companies' performance is on climate resilience. In line with this material issue, our performance commitment is to outperform the GHG intensity



(WACI) of the portfolio's reference universe (investable universe) for all our Article 9 strategies.

#### 5. Board Diversity

Board diversity is also systematically accounted for in our sustainability assessments through our ESG Integration, voting, as well as engagements. Our goal is actively promote good governance in the management of companies. In our effort to ensure tangible results are achieved in this issue, we make it our binding commitment to outperform the Board gender diversity of the portfolio's reference universe for all our Article 9 strategies.

#### Controversy-based post investment capping as continuous ESG risk management and DNSH approach

To ensure continuous accounting for ESG risks that are evolving by nature, Portfolio Managers are required to cap the position at 2% in companies already in the portfolio, that become exposed to high with negative outlook and/or severe ESG controversies. Moreover, PMs can also apply a 2% cap in companies which are exposed to an ESG risk controversy they deem to be material even if the third-party assessment has indicated a lower risk level. For each strategy, the total number of capped securities cannot be more than five. Further, targeted engagement with the company is initiated. The cap would be lifted if sufficient performance improvement is demonstrated within 6 months. Portfolio Managers will exit the investment otherwise.

Please note that we exclude all companies that are exposed to high-risk controversy with negative outlook and severe risk controversy from the portfolio. This is discussed in detail in our Exclusion Policy.

#### Frequency of review of ESG information

ESG risk and opportunity assessment is reviewed on an ongoing basis – with the portfolio managers continually receiving company and industry updates.

More broadly, the Thematics AM ESG team and RI Committee conducts a quarterly review of all assets under management across all sustainability KPIs.



#### ESG Performance disclosure

All Thematics AM funds, through its annual precontractual documents and sustainability report, disclose on a number of sustainability KPIs including the following that relate to the ESG Integration approach:

- Percentage of each strategy's assets under management that are subject to ESG analysis
- ESG rating vs Investable Universe's rating (measured as the rolling 3 months average
  of the weekly rating), after eliminating at least 20% of the worst-rated securities of the
  latter.
- GHG Intensity of fund vs Investable Universe
- Board gender diversity of fund vs Investable Universe
- Percentage of each strategy's assets under management of the newly invested issuers that have already high with negative outlook and/or severe ESG controversies at the time of investment
- Number of already invested issuers that become exposed to high with negative outlook and/or severe ESG controversies and within a 6-month time frame:
  - are not engaged or,
  - are engaged but do not demonstrate sufficient performance



#### **Legal Information**

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