



**PRIVATE TRANSPARENCY REPORT**

**2023**

**CAPITAL GRAND EST**

Generated 15-12-2023

# About this report

PRI reporting is the largest global reporting project on responsible investment. It was developed with investors, for investors.

PRI signatories are required to report publicly on their responsible investment activities each year. In turn, they receive a number of outputs, including a public and private Transparency Report.

The private Transparency Reports, which are produced using signatories' reported information, support signatories to have internal discussions about their practices. Signatories can also choose to make these available to clients, beneficiaries, and other stakeholders.

This private Transparency Report is an export of your responses to the PRI Reporting Framework during the 2023 reporting period. It includes all responses (public and private) to core and plus indicators.

In response to signatory feedback, the PRI has not summarised your responses – the information in this document is presented exactly as it was reported.

For each of the indicators in this document, all options that you selected are presented, including links and qualitative responses. In some indicators, all applicable options are included for additional context.

## Disclaimers

### Responsible investment definitions

Within the PRI Reporting Framework Glossary, we provide definitions for key terms to guide reporting on responsible investment practices in the Reporting Framework. These definitions may differ from those used or proposed by other authorities and regulatory bodies due to evolving industry perspectives and changing legislative landscapes. Users of this report should be aware of these variations, as they may impact interpretations of the information provided.

### Data accuracy

This document presents information reported directly by signatories in the 2023 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented.

The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

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# SENIOR LEADERSHIP STATEMENT (SLS)

## SENIOR LEADERSHIP STATEMENT

### SENIOR LEADERSHIP STATEMENT

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection                  | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-----------------------------|---------------|
| SLS 1     | CORE              | N/A          | N/A        | PUBLIC     | Senior Leadership Statement | GENERAL       |

#### Section 1. Our commitment

- Why does your organisation engage in responsible investment?
- What is your organisation's overall approach to responsible investment, and what major responsible investment commitment(s) have you made?

Notre démarche d'investissement responsable s'inscrit en cohérence avec les objectifs historiques de Capital Grand Est, à savoir la recherche de développement économique, d'impact local et de création durable de valeur. Nous sommes en effet convaincus qu'encourager la croissance durable aux cotés de nos participations a un impact positif réel et engendre une création de valeur à long terme. La mission de l'ensemble de nos collaborateurs est de guider notre gestion et nos participations vers un comportement plus responsable, notamment sur les sujets d'ESG, et inscrire cette démarche dans une évolution continue, dynamique et vertueuse. Notre engagement de réaliser des investissements en cohérence avec notre démarche et nos valeurs est concrétisé par une analyse préalable et une évaluation régulière des indicateurs ESG, d'une part pour notre propre fonctionnement en tant que société de gestion, et d'autre part pour l'ensemble des opportunités d'investissement que nous analysons. Cette évaluation régulière, permettant d'apprécier une démarche de progrès, constitue une base de dialogue pour les échanges menés par Capital Grand Est pour accompagner nos participations dans leur développement. A ce stade, cette évaluation est indicative mais n'est pas contraignante ni dans la sélection des participations ni dans leur suivi.

#### Section 2. Annual overview

- Discuss your organisation's progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.
- Reflect on your performance with respect to your organisation's responsible investment objectives and targets during the reporting year. Details might include, for example, outlining your single most important achievement or describing your general progress on topics such as the following (where applicable):
  - refinement of ESG analysis and incorporation
  - stewardship activities with investees and/or with policymakers
  - collaborative engagements
  - attainment of responsible investment certifications and/or awards

L'année 2022 a été marquée par la mise en place progressive de notre nouvelle démarche ESG avec la réalisation d'une évaluation systématique des enjeux ESG en phase de préinvestissement, et un suivi annuel de l'évaluation des indicateurs ESG. Cette démarche, très appréciée de nos participations, permet d'identifier et quantifier leur progression en matière environnementale, sociale et de gouvernance.

Nous souhaitons en effet inciter les participations à progresser en matière de RSE et de prise en compte des aspects ESG dans leur développement, et inscrivons formellement cette démarche dans les pactes d'associés avec nos partenaires. Ce suivi annuel vise dans un premier temps à accompagner et structurer la démarche des participations puis à leur apporter une aide pour la renforcer.

### Section 3. Next steps

- What specific steps has your organisation outlined to advance your commitment to responsible investment in the next two years?

Notre organisation a identifié deux axes pour faire progresser l'engagement en faveur de l'investissement responsable. Il s'agit dans un premier temps de mettre en place un processus de révision annuel du référentiel d'évaluation ESG construit (évolution du questionnaire, révision du benchmark). Cette action pourra être complétée dans un second temps par la mise en place d'un processus de formation ESG périodique.

### Section 4. Endorsement

**'The Senior Leadership Statement has been prepared and/or reviewed by the undersigned and reflects our organisation-wide commitment and approach to responsible investment'.**

Name

François LORY

Position

Président

Organisation's Name

CAPITAL GRAND EST

A

**'This endorsement applies only to the Senior Leadership Statement and should not be considered an endorsement of the information reported by the above-mentioned organisation in the various modules of the Reporting Framework. The Senior Leadership Statement serves as a general overview of the above-mentioned organisation's responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such. Further, it is not a substitute for the skill, judgement and experience of any third parties, their management, employees, advisors and/or clients when making investment and other business decisions'.**

B

# ORGANISATIONAL OVERVIEW (OO)

## ORGANISATIONAL INFORMATION

### REPORTING YEAR

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection     | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------|---------------|
| OO 1      | CORE              | N/A          | N/A        | PUBLIC     | Reporting year | GENERAL       |

What is the year-end date of the 12-month period you have chosen to report for PRI reporting purposes?

|  | Date | Month | Year |
|--|------|-------|------|
| Year-end date of the 12-month period for PRI reporting purposes: | 31   | 12    | 2022 |

## SUBSIDIARY INFORMATION

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection             | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------------------|---------------|
| OO 2      | CORE              | N/A          | OO 2.1     | PUBLIC     | Subsidiary information | GENERAL       |

Does your organisation have subsidiaries?

- (A) Yes
- (B) No

# ASSETS UNDER MANAGEMENT

## ALL ASSET CLASSES

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection        | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-------------------|---------------|
| OO 4      | CORE              | OO 3         | N/A        | PUBLIC     | All asset classes | GENERAL       |

What are your total assets under management (AUM) at the end of the reporting year, as indicated in [OO 1]?

USD

(A) AUM of your organisation, including subsidiaries, and excluding the AUM subject to execution, advisory, custody, or research advisory only

US\$ 239,320,030.00

(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission, as indicated in [OO 2.2]

US\$ 0.00

(C) AUM subject to execution, advisory, custody, or research advisory only

US\$ 0.00

**Additional information on the exchange rate used: (Voluntary)**

EUR 1.00 = 1.237310 USD

## ASSET BREAKDOWN

| Indicator | Type of indicator | Dependent on | Gateway to          | Disclosure | Subsection      | PRI Principle |
|-----------|-------------------|--------------|---------------------|------------|-----------------|---------------|
| OO 5      | CORE              | OO 3         | Multiple indicators | PRIVATE    | Asset breakdown | GENERAL       |

Provide a percentage breakdown of your total AUM at the end of the reporting year as indicated in [OO 1].

|                       | (1) Percentage of Internally managed AUM | (2) Percentage of Externally managed AUM |
|-----------------------|--|--|
| (A) Listed equity     | 0%                                       | 0%                                       |
| (B) Fixed income      | 0%                                       | 0%                                       |
| (C) Private equity    | 100%                                     | 0%                                       |
| (D) Real estate       | 0%                                       | 0%                                       |
| (E) Infrastructure    | 0%                                       | 0%                                       |
| (F) Hedge funds       | 0%                                       | 0%                                       |
| (G) Forestry          | 0%                                       | 0%                                       |
| (H) Farmland          | 0%                                       | 0%                                       |
| (I) Other             | 0%                                       | 0%                                       |
| (J) Off-balance sheet | 0%                                       | 0%                                       |



## ASSET BREAKDOWN: INTERNALLY MANAGED PRIVATE EQUITY

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection   | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--|---------------|
| OO 5.3 PE | CORE              | OO 5         | N/A        | PRIVATE    | Asset breakdown:<br>Internally managed<br>private equity | GENERAL       |

**Provide a further breakdown of your internally managed private equity AUM.**

(A) Venture capital 49%

(B) Growth capital 7%

(C) (Leveraged) buy-out 44%

(D) Distressed, turnaround or  
special situations 0%

(E) Secondaries 0%

(F) Other 0%

## GEOGRAPHICAL BREAKDOWN

| Indicator | Type of indicator | Dependent on              | Gateway to | Disclosure | Subsection                | PRI Principle |
|-----------|-------------------|---------------------------|------------|------------|---------------------------|---------------|
| OO 7      | CORE              | Multiple, see<br>guidance | N/A        | PUBLIC     | Geographical<br>breakdown | GENERAL       |

**How much of your AUM in each asset class is invested in emerging markets and developing economies?**

### AUM in Emerging Markets and Developing Economies

(F) Private equity (1) 0%

## STEWARDSHIP

### STEWARDSHIP

| Indicator | Type of indicator | Dependent on           | Gateway to          | Disclosure | Subsection  | PRI Principle |
|-----------|-------------------|------------------------|---------------------|------------|-------------|---------------|
| OO 8      | CORE              | Multiple, see guidance | Multiple indicators | PUBLIC     | Stewardship | GENERAL       |

Does your organisation conduct stewardship activities, excluding (proxy) voting, for any of your assets?

#### (5) Private equity

|                                    |                                     |
|------------------------------------|-------------------------------------|
| (A) Yes, through internal staff    | <input checked="" type="checkbox"/> |
| (B) Yes, through service providers | <input type="checkbox"/>            |
| (C) Yes, through external managers | <input type="checkbox"/>            |
| (D) We do not conduct stewardship  | <input type="radio"/>               |

## ESG INCORPORATION

### INTERNALLY MANAGED ASSETS

| Indicator | Type of indicator | Dependent on           | Gateway to          | Disclosure | Subsection                | PRI Principle |
|-----------|-------------------|------------------------|---------------------|------------|---------------------------|---------------|
| OO 11     | CORE              | Multiple, see guidance | Multiple indicators | PUBLIC     | Internally managed assets | 1             |

For each internally managed asset class, does your organisation incorporate ESG factors into your investment decisions?

(1) Yes, we incorporate ESG factors into our investment decisions

(2) No, we do not incorporate ESG factors into our investment decisions

(l) Private equity



## ESG/SUSTAINABILITY FUNDS AND PRODUCTS

### LABELLING AND MARKETING

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection              | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-------------------------|---------------|
| OO 18     | CORE              | OO 11–14     | OO 18.1    | PUBLIC     | Labelling and marketing | 1             |

**Do you explicitly market any of your products and/or funds as ESG and/or sustainable?**

- (A) Yes, we market products and/or funds as ESG and/or sustainable
- (B) No, we do not offer products or funds explicitly marketed as ESG and/or sustainable
- (C) Not applicable; we do not offer products or funds

**Additional information: (Voluntary)**

In 2022, Capital Grand Est was not marketing any funds as ESG and/or sustainable. However, environmental, social and governance issues were already integrated into investment decisions. In 2023, Capital Grand Est is in the process of classifying its new fund as Art. 8 according to Regulation 2018/2099. The management company has called on an external service provider, Ethifinance, to support it in this process of classifying the new fund.

## SUMMARY OF REPORTING REQUIREMENTS

### SUMMARY OF REPORTING REQUIREMENTS

| Indicator | Type of indicator | Dependent on        | Gateway to          | Disclosure | Subsection                        | PRI Principle |
|-----------|-------------------|---------------------|---------------------|------------|-----------------------------------|---------------|
| OO 21     | CORE              | Multiple indicators | Multiple indicators | PUBLIC     | Summary of reporting requirements | GENERAL       |

The following table shows which modules are mandatory or voluntary to report on in the separate PRI asset class modules. Where a module is voluntary, indicate if you wish to report on it.

| Applicable modules              | (1) Mandatory to report<br>(pre-filled based on<br>previous responses) | (2.1) Voluntary to report.<br>Yes, I want to opt-in to<br>reporting on the module | (2.2) Voluntary to report.<br>No, I want to opt-out of<br>reporting on the module |
|---------------------------------|--|---|---|
| Policy, Governance and Strategy | <input checked="" type="radio"/>                                       | <input type="radio"/>   | <input type="radio"/>   |
| Confidence Building Measures    | <input checked="" type="radio"/>                                       | <input type="radio"/>   | <input type="radio"/>   |
| (I) Private equity              | <input checked="" type="radio"/>                                       | <input type="radio"/>   | <input type="radio"/>   |

## OTHER ASSET BREAKDOWNS

### PRIVATE EQUITY: SECTORS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection                 | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------------------|---------------|
| OO 22     | CORE              | OO 21        | N/A        | PUBLIC     | Private equity:<br>Sectors | GENERAL       |

In which sector(s) are your internally managed private equity assets invested?

- (A) Energy
- (B) Materials
- (C) **Industrials**
- (D) Consumer discretionary
- (E) Consumer staples
- (F) **Healthcare**
- (G) Financials
- (H) **Information technology**
- (I) Communication services
- (J) **Utilities**
- (K) **Real estate**

## PRIVATE EQUITY: OWNERSHIP LEVEL

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection                      | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---------------------------------|---------------|
| OO 23     | CORE              | OO 21        | N/A        | PUBLIC     | Private equity: Ownership level | GENERAL       |

What is the percentage breakdown of your internally managed private equity investments by the level of ownership?

- (A) A majority stake (more than 50%)
- (B) A significant minority stake (between 10–50%)  
 Select from the list:
- (1) >0 to 10%
  - (2) >10 to 50%
  - (3) >50 to 75%
  - (4) >75%
- (C) A limited minority stake (less than 10%)  
 Select from the list:
- (1) >0 to 10%
  - (2) >10 to 50%

## SUBMISSION INFORMATION

### REPORT DISCLOSURE

| Indicator | Type of indicator | Dependent on     | Gateway to | Disclosure | Subsection        | PRI Principle |
|-----------|-------------------|------------------|------------|------------|-------------------|---------------|
| OO 31     | CORE              | Reporting status | N/A        | PUBLIC     | Report disclosure | GENERAL       |

Your organisation is in its voluntary reporting period; do you wish to make your responses available to the public?

- (A) Yes, publish all responses to Core indicators and any Plus indicators that are indicated for publication
- (B) No, keep all our responses private for this year

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection        | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-------------------|---------------|
| OO 32     | CORE              | OO 3, OO 31  | N/A        | PUBLIC     | Report disclosure | GENERAL       |

How would you like to disclose the detailed percentage figures you reported throughout the Reporting Framework?

- (A) Publish as absolute numbers
- (B) Publish as ranges

# POLICY, GOVERNANCE AND STRATEGY (PGS)

## POLICY

### RESPONSIBLE INVESTMENT POLICY ELEMENTS

| Indicator | Type of indicator | Dependent on | Gateway to          | Disclosure | Subsection                             | PRI Principle |
|-----------|-------------------|--------------|---------------------|------------|--|---------------|
| PGS 1     | CORE              | OO 8, OO 9   | Multiple indicators | PUBLIC     | Responsible investment policy elements | 1, 2          |

Which elements are covered in your formal responsible investment policy(ies)?

- (A) Overall approach to responsible investment
- (B) Guidelines on environmental factors
- (C) Guidelines on social factors
- (D) Guidelines on governance factors
- (E) Guidelines on sustainability outcomes
- (F) Guidelines tailored to the specific asset class(es) we hold
- (G) Guidelines on exclusions
- (H) Guidelines on managing conflicts of interest related to responsible investment
- (I) Stewardship: Guidelines on engagement with investees
- (J) Stewardship: Guidelines on overall political engagement
- (K) Stewardship: Guidelines on engagement with other key stakeholders
- (M) Other responsible investment elements not listed here
- (N) Our organisation does not have a formal responsible investment policy and/or our policy(ies) do not cover any responsible investment elements

| Indicator | Type of indicator | Dependent on | Gateway to             | Disclosure | Subsection                             | PRI Principle |
|-----------|-------------------|--------------|------------------------|------------|--|---------------|
| PGS 2     | CORE              | PGS 1        | Multiple, see guidance | PUBLIC     | Responsible investment policy elements | 1             |

Does your formal responsible investment policy(ies) include specific guidelines on systematic sustainability issues?

- (A) Specific guidelines on climate change (may be part of guidelines on environmental factors)
- (B) Specific guidelines on human rights (may be part of guidelines on social factors)
- (C) Specific guidelines on other systematic sustainability issues
- (D) Our formal responsible investment policy(ies) does not include guidelines on systematic sustainability issues

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection                             | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--|---------------|
| PGS 3     | CORE              | PGS 1, PGS 2 | N/A        | PUBLIC     | Responsible investment policy elements | 6             |

**Which elements of your formal responsible investment policy(ies) are publicly available?**

**(A) Overall approach to responsible investment**

Add link:

<https://www.capitalgrandest.eu/nos-engagements/integrite/>

- (B) Guidelines on environmental factors
- (C) Guidelines on social factors
- (D) Guidelines on governance factors
- (J) Guidelines on exclusions
- (L) Stewardship: Guidelines on engagement with investees
- (Q) No elements of our formal responsible investment policy(ies) are publicly available

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection                             | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--|---------------|
| PGS 4     | PLUS              | PGS 1        | N/A        | PUBLIC     | Responsible investment policy elements | 1 – 6         |

**Does your formal responsible investment policy(ies) identify a link between your responsible investment activities and your fiduciary duties or equivalent obligations?**

**(A) Yes**

Elaborate:

Our approach to responsible investment is in line with Capital Grand Est's long-standing objectives of economic development, local impact and sustainable value creation. Indeed, we are convinced that encouraging sustainable growth alongside our investments has a real positive impact and generates long-term value creation. Our responsible investment policy enables us to reduce investment-related risks such as operational, legal and reputational risks, and therefore financial risks, by adopting sustainable practices. Finally, the formalization of our responsible investment approach also enables us to maintain lasting relationships with our current stakeholders, and to increase our economic and financial opportunities.

- (B) No

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection                             | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--|---------------|
| PGS 5     | CORE              | PGS 1        | N/A        | PUBLIC     | Responsible investment policy elements | 2             |

**Which elements are covered in your organisation’s policy(ies) or guidelines on stewardship?**

- (A) Overall stewardship objectives
- (B) Prioritisation of specific ESG factors to be advanced via stewardship activities
- (C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to focus our stewardship efforts
- (D) How different stewardship tools and activities are used across the organisation
- (E) Approach to escalation in stewardship
- (F) Approach to collaboration in stewardship
- (G) Conflicts of interest related to stewardship
- (H) How stewardship efforts and results are communicated across the organisation to feed into investment decision-making and vice versa
- (I) Other
- (J) None of the above elements is captured in our policy(ies) or guidelines on stewardship

**RESPONSIBLE INVESTMENT POLICY COVERAGE**

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection                             | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--|---------------|
| PGS 8     | CORE              | PGS 1        | N/A        | PUBLIC     | Responsible investment policy coverage | 1             |

**What percentage of your total AUM is covered by the below elements of your responsible investment policy(ies)?**

**Combined AUM coverage of all policy elements**

- (A) Overall approach to responsible investment
  - (B) Guidelines on environmental factors
  - (C) Guidelines on social factors
  - (D) Guidelines on governance factors
- (7) 100%



| Indicator | Type of indicator | Dependent on      | Gateway to | Disclosure | Subsection                             | PRI Principle |
|-----------|-------------------|-------------------|------------|------------|--|---------------|
| PGS 10    | CORE              | OO 8, OO 9, PGS 1 | N/A        | PUBLIC     | Responsible investment policy coverage | 2             |

Per asset class, what percentage of your AUM is covered by your policy(ies) or guidelines on stewardship with investees?

(C) Private equity

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

(2) If your AUM coverage is below 100%, explain why: (Voluntary)

We dialogue with all companies subject to ESG analysis by Ethifinance, i.e. around 40% of all our lines.

## GOVERNANCE

### ROLES AND RESPONSIBILITIES

| Indicator | Type of indicator | Dependent on | Gateway to          | Disclosure | Subsection                 | PRI Principle |
|-----------|-------------------|--------------|---------------------|------------|----------------------------|---------------|
| PGS 11    | CORE              | N/A          | Multiple indicators | PUBLIC     | Roles and responsibilities | 1             |

Which senior level body(ies) or role(s) in your organisation have formal oversight over and accountability for responsible investment?

- (A) Board members, trustees, or equivalent
- (B) Senior executive-level staff, or equivalent

Specify:

Guillaume Joerg : Secrétaire Général (General Secretary)

- (C) Investment committee, or equivalent
- (D) Head of department, or equivalent
- (E) None of the above bodies and roles have oversight over and accountability for responsible investment

| Indicator | Type of indicator | Dependent on         | Gateway to | Disclosure | Subsection                 | PRI Principle |
|-----------|-------------------|----------------------|------------|------------|----------------------------|---------------|
| PGS 11.1  | CORE              | PGS 1, PGS 2, PGS 11 | N/A        | PUBLIC     | Roles and responsibilities | 1, 2          |

Does your organisation's senior level body(ies) or role(s) have formal oversight over and accountability for the elements covered in your responsible investment policy(ies)?

|   | (1) Board members, trustees, or equivalent | (2) Senior executive-level staff, investment committee, head of department, or equivalent |
|---|--|---|
| (A) Overall approach to responsible investment  | <input checked="" type="checkbox"/>        | <input checked="" type="checkbox"/>   |
| (B) Guidelines on environmental, social and/or governance factors   | <input checked="" type="checkbox"/>        | <input checked="" type="checkbox"/>   |
| (H) Guidelines on exclusions  | <input checked="" type="checkbox"/>        | <input checked="" type="checkbox"/>   |
| (J) Stewardship: Guidelines on engagement with investees  | <input type="checkbox"/>                   | <input type="checkbox"/>  |
| (N) This role has no formal oversight over and accountability for any of the above elements covered in our responsible investment policy(ies) | <input type="radio"/>                      | <input type="radio"/>   |

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection                 | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------------------|---------------|
| PGS 11.2  | CORE              | N/A          | N/A        | PUBLIC     | Roles and responsibilities | 1 – 6         |

Does your organisation have governance processes or structures to ensure that your overall political engagement is aligned with your commitment to the principles of PRI, including any political engagement conducted by third parties on your behalf?

- (A) Yes
- (B) No

● (C) Not applicable, our organisation does not conduct any form of political engagement directly or through any third parties

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection                 | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------------------|---------------|
| PGS 12    | CORE              | N/A          | N/A        | PUBLIC     | Roles and responsibilities | 1             |

**In your organisation, which internal or external roles are responsible for implementing your approach to responsible investment?**

(A) Internal role(s)

Specify:

The General Secretary of Capital Grand Est is in charge of steering the responsible investment approach and its implementation. All Capital Grand Est managers are responsible for implementing the ESG approach.

(B) External investment managers, service providers, or other external partners or suppliers

Specify:

Calling on an external service provider (EthiFinance) to support Capital Grand Est in implementing its responsible investment approach. Each year, EthiFinance carries out an ESG assessment of the funds' holdings, and produces an ESG report outlining the performance and practices of the holdings.

(C) We do not have any internal or external roles with responsibility for implementing responsible investment

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection                 | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------------------|---------------|
| PGS 13    | CORE              | PGS 11       | N/A        | PUBLIC     | Roles and responsibilities | 1             |

**Does your organisation use responsible investment KPIs to evaluate the performance of your board members, trustees, or equivalent?**

(A) Yes, we use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

● (B) No, we do not use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

Explain why: (Voluntary)

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection                 | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------------------|---------------|
| PGS 14    | CORE              | PGS 11       | N/A        | PUBLIC     | Roles and responsibilities | 1             |

**Does your organisation use responsible investment KPIs to evaluate the performance of your senior executive-level staff (or equivalent), and are these KPIs linked to compensation?**

- (A) Yes, we use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)
- (B) No, we do not use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)**

Explain why: (Voluntary)

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection                 | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------------------|---------------|
| PGS 15    | PLUS              | PGS 11       | N/A        | PUBLIC     | Roles and responsibilities | 1             |

**What responsible investment competencies do you regularly include in the training of senior-level body(ies) or role(s) in your organisation?**

|  | (1) Board members, trustees or equivalent | (2) Senior executive-level staff, investment committee, head of department or equivalent |
|--|---|--|
| (A) Specific competence in climate change mitigation and adaptation          | <input checked="" type="checkbox"/>       | <input checked="" type="checkbox"/>  |
| (B) Specific competence in investors' responsibility to respect human rights | <input checked="" type="checkbox"/>       | <input checked="" type="checkbox"/>  |
| (C) Specific competence in other systematic sustainability issues            | <input checked="" type="checkbox"/>       | <input checked="" type="checkbox"/>  |

(D) The regular training of this senior leadership role does not include any of the above responsible investment competencies

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## EXTERNAL REPORTING AND DISCLOSURES

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection                         | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------------------------------|---------------|
| PGS 16    | CORE              | N/A          | N/A        | PUBLIC     | External reporting and disclosures | 6             |

**What elements are included in your regular reporting to clients and/or beneficiaries for the majority of your AUM?**

- (A) Any changes in policies related to responsible investment
- (B) Any changes in governance or oversight related to responsible investment
- (C) Stewardship-related commitments
- (D) Progress towards stewardship-related commitments
- (E) Climate-related commitments
- (F) Progress towards climate-related commitments
- (G) Human rights-related commitments
- (H) Progress towards human rights-related commitments
- (I) Commitments to other systematic sustainability issues
- (J) Progress towards commitments on other systematic sustainability issues
- (K) We do not include any of these elements in our regular reporting to clients and/or beneficiaries for the majority of our AUM

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection                         | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------------------------------|---------------|
| PGS 17    | CORE              | N/A          | N/A        | PUBLIC     | External reporting and disclosures | 6             |

**During the reporting year, did your organisation publicly disclose climate-related information in line with the Task Force on Climate-Related Financial Disclosures' (TCFD) recommendations?**

- (A) Yes, including all governance-related recommended disclosures
- (B) Yes, including all strategy-related recommended disclosures
- (C) Yes, including all risk management-related recommended disclosures
- (D) Yes, including all applicable metrics and targets-related recommended disclosures
- (E) None of the above
  - Explain why: (Voluntary)

The climate-related indicators and information recommended by the TCFD are not yet available, due to the relatively recent definition of the responsible investment strategy and associated indicators. In addition, Capital Grand Est remains a human-scale player in the investment sector, which may explain the non-publication of information at this stage.

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection                         | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------------------------------|---------------|
| PGS 19    | CORE              | N/A          | N/A        | PUBLIC     | External reporting and disclosures | 6             |

**During the reporting year, did your organisation publicly disclose its membership in and support for trade associations, think tanks or similar bodies that conduct any form of political engagement?**

- (A) Yes, we publicly disclosed our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- (B) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- (C) **Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year**

## STRATEGY

### CAPITAL ALLOCATION

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection         | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--------------------|---------------|
| PGS 20    | CORE              | N/A          | N/A        | PUBLIC     | Capital allocation | 1             |

**Which elements do your organisation-level exclusions cover?**

- (A) **Exclusions based on our organisation's values or beliefs regarding particular sectors, products or services**
- (B) Exclusions based on our organisation's values or beliefs regarding particular regions or countries
- (C) Exclusions based on minimum standards of business practice aligned with international norms such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, UN Security Council sanctions or the UN Global Compact
- (D) Exclusions based on our organisation's climate change commitments
- (E) Other elements
- (F) Not applicable; our organisation does not have any organisation-level exclusions

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection         | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--------------------|---------------|
| PGS 21    | CORE              | N/A          | N/A        | PUBLIC     | Capital allocation | 1             |

**How does your responsible investment approach influence your strategic asset allocation process?**

- (A) We incorporate ESG factors into our assessment of expected asset class risks and returns
- (B) We incorporate climate change–related risks and opportunities into our assessment of expected asset class risks and returns
- (C) We incorporate human rights–related risks and opportunities into our assessment of expected asset class risks and returns
- (D) We incorporate risks and opportunities related to other systematic sustainability issues into our assessment of expected asset class risks and returns
- (E) We do not incorporate ESG factors, climate change, human rights or other systematic sustainability issues into our assessment of expected asset class risks and returns
- (F) **Not applicable; we do not have a strategic asset allocation process**

**STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY**

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection                                | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---|---------------|
| PGS 22    | CORE              | OO 8, OO 9   | N/A        | PUBLIC     | Stewardship: Overall stewardship strategy | 2             |

**For the majority of AUM within each asset class, which of the following best describes your primary stewardship objective?**

**(3) Private equity**

(A) Maximise our portfolio-level risk-adjusted returns. In doing so, we seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.

(B) Maximise our individual investments' risk-adjusted returns. In doing so, we do not seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.

| Indicator | Type of indicator | Dependent on     | Gateway to | Disclosure | Subsection                                | PRI Principle |
|-----------|-------------------|------------------|------------|------------|---|---------------|
| PGS 23    | PLUS              | OO 5, OO 8, OO 9 | N/A        | PUBLIC     | Stewardship: Overall stewardship strategy | 2             |

**How does your organisation, or the external service providers or external managers acting on your behalf, prioritise the investees or other entities on which to focus its stewardship efforts?**

EthiFinance, an external service provider contracted by Capital Grand Est, provides ESG ratings for the portfolio and dialogue with investee companies, highlighting not only the portfolio's overall strengths and areas for improvement, but also the strengths and areas for attention at the level of each entity. This methodology makes it possible to compare each entity with a benchmark and thus identify the portfolio's ESG priorities.

| Indicator | Type of indicator | Dependent on     | Gateway to | Disclosure | Subsection                                | PRI Principle |
|-----------|-------------------|------------------|------------|------------|---|---------------|
| PGS 25    | PLUS              | OO 5, OO 8, OO 9 | N/A        | PUBLIC     | Stewardship: Overall stewardship strategy | 2             |

**Rank the channels that are most important for your organisation in achieving its stewardship objectives.**

**(A) Internal resources, e.g. stewardship team, investment team, ESG team, or staff**

Select from the list:

- 1
- 3
- 4
- 5

(B) External investment managers, third-party operators and/or external property managers, if applicable

**(C) External paid specialist stewardship services (e.g. engagement overlay services or, in private markets, sustainability consultants) excluding investment managers, real assets third-party operators, or external property managers**

Select from the list:

- 2
- 3
- 4
- 5

(D) Informal or unstructured collaborations with investors or other entities

(E) Formal collaborative engagements, e.g. PRI-coordinated collaborative engagements, Climate Action 100+, or similar

(F) We do not use any of these channels



| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection                                | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---|---------------|
| PGS 27    | PLUS              | OO 8, OO 9   | N/A        | PUBLIC     | Stewardship: Overall stewardship strategy | 2             |

**How are your organisation's stewardship activities linked to your investment decision making, and vice versa?**

During the investment process, commitment measures are taken during the investment phase. This involves discussions and exchanges with management, leading to an assessment of the current situation and possible action plans, followed by monitoring of ESG criteria with management. These exchanges and dialogues can take the form of face-to-face meetings with shareholders and site visits. Finally, there is a phase of impact measurement, with monitoring of actions and progress through ESG questionnaires sent to entities and tracking of ESG KPIs.

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection                                | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---|---------------|
| PGS 28    | PLUS              | OO 8, OO 9   | N/A        | PUBLIC     | Stewardship: Overall stewardship strategy | 2             |

**If relevant, provide any further details on your organisation's overall stewardship strategy.**

In addition to systematic assessments of ESG issues in the pre-investment phase, and annual monitoring of ESG indicator evaluations, Capital Grand Est has implemented sector exclusions. As part of our ethical and responsible approach, we have decided to exclude the following sectors from the investment perimeter: activities associated with mining and coal combustion; the production or sale of tobacco or cannabis, including for therapeutic purposes; the production or sale of alcohol or alcohol-derived products; the production or sale of weapons or ammunition of any kind; gambling.

## STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

| Indicator | Type of indicator | Dependent on | Gateway to         | Disclosure | Subsection                                 | PRI Principle |
|-----------|-------------------|--------------|--------------------|------------|--|---------------|
| PGS 39    | CORE              | OO 8, OO 9   | PGS 39.1, PGS 39.2 | PUBLIC     | Stewardship: Engagement with policy makers | 2             |

**Did your organisation, or the external investment managers or service providers acting on your behalf, engage with policy makers as part of your responsible investment approach during the reporting year?**

- (A) Yes, we engaged with policy makers directly
- (B) Yes, we engaged with policy makers through the leadership of or active participation in working groups or collaborative initiatives, including via the PRI

(C) Yes, we were members of, supported, or were in another way affiliated with third party organisations, including trade associations and non-profit organisations, that engage with policy makers, excluding the PRI

(D) We did not engage with policy makers directly or indirectly during the reporting year beyond our membership in the PRI

Explain why: (Voluntary)

## STEWARDSHIP: EXAMPLES

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection            | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-----------------------|---------------|
| PGS 40    | PLUS              | OO 8, OO 9   | N/A        | PUBLIC     | Stewardship: Examples | 2             |

**Provide examples of stewardship activities that you conducted individually or collaboratively during the reporting year that contributed to desired changes in the investees, policy makers or other entities with which you interacted.**

(A) Example 1:

Title of stewardship activity:

Return of ESG performance to an investment

(1) Led by

(1) Internally led

(2) External service provider led

(3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

(1) Environmental factors

(2) Social factors

(3) Governance factors

(3) Asset class(es)

(1) Listed equity

(2) Fixed income

(3) Private equity

(4) Real estate

(5) Infrastructure

(6) Hedge funds

(7) Forestry

(8) Farmland

(9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Reporting of the entity's overall ESG performance, as well as detailed performance on selected Environmental, Social and Governance KPIs relevant to the company's sector and activity. It is a report on results and a commitment to improve on these KPIs. Finally, strengths and areas for improvement are communicated to the company, enabling action plans to be defined.

(B) Example 2:

Title of stewardship activity:

- (1) Led by
  - (1) Internally led
  - (2) External service provider led
  - (3) Led by an external investment manager, real assets third-party operator and/or external property manager
- (2) Primary focus of stewardship activity
  - (1) Environmental factors
  - (2) Social factors
  - (3) Governance factors
- (3) Asset class(es)
  - (1) Listed equity
  - (2) Fixed income
  - (3) Private equity
  - (4) Real estate
  - (5) Infrastructure
  - (6) Hedge funds
  - (7) Forestry
  - (8) Farmland
  - (9) Other
- (4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

(C) Example 3:

Title of stewardship activity:

- (1) Led by
  - (1) Internally led
  - (2) External service provider led
  - (3) Led by an external investment manager, real assets third-party operator and/or external property manager
- (2) Primary focus of stewardship activity
  - (1) Environmental factors
  - (2) Social factors
  - (3) Governance factors
- (3) Asset class(es)
  - (1) Listed equity
  - (2) Fixed income
  - (3) Private equity
  - (4) Real estate
  - (5) Infrastructure
  - (6) Hedge funds
  - (7) Forestry
  - (8) Farmland
  - (9) Other
- (4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

(D) Example 4:

Title of stewardship activity:

- (1) Led by
  - (1) Internally led
  - (2) External service provider led
  - (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

(E) Example 5:

Title of stewardship activity:

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

## CLIMATE CHANGE

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection     | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------|---------------|
| PGS 41    | CORE              | N/A          | PGS 41.1   | PUBLIC     | Climate change | General       |

### Has your organisation identified climate-related risks and opportunities affecting your investments?

(A) Yes, within our standard planning horizon

**(B) Yes, beyond our standard planning horizon**

Specify the risks and opportunities identified and your relevant standard planning horizon:

Capital Grand Est has identified various risks linked to climate change, in particular that of investing in companies whose activities are associated with mining and coal combustion. This is why, in order to avoid ESG risks and in particular climate risks, Capital Grand Est has set up a procedure to exclude these companies. As these risks have very long-term horizons, the planning horizon is thus beyond the usual one.

(C) No, we have not identified climate-related risks and/or opportunities affecting our investments

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection     | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------|---------------|
| PGS 41.1  | CORE              | PGS 41       | N/A        | PUBLIC     | Climate change | General       |

### Does your organisation integrate climate-related risks and opportunities affecting your investments in its overall investment strategy, financial planning and (if relevant) products?

**(A) Yes, our overall investment strategy, financial planning and (if relevant) products integrate climate-related risks and opportunities**

Describe how climate-related risks and opportunities have affected or are expected to affect your investment strategy, financial planning and (if relevant) products:

Capital Grant Est has carried out an assessment of potential risks that could significantly affect the activities of its holdings, and thus cause financial damage. These identified risks have been grouped together in a risk map. Before investing in a company, an ESG analysis will be carried out during the pre-investment phase for all projects under consideration, enabling Capital Grand Est to assess its exposure to physical or transitional risks. This pre-investment assessment, carried out in particular using an analysis grid comprising some forty questions, enables us to establish an ESG profile and rating, and is part of the systematic due diligence carried out prior to any investment. This assessment enables us to identify the strengths as well as the various major extra-financial risks (social, governance, physical, transitional and loss of biodiversity) to which companies are exposed, which will then guide the dialogue conducted with the management of the holdings. Finally, a review of controversial issues is carried out as part of the investment opportunity assessment phase.

(B) No, our organisation has not yet integrated climate-related risks and opportunities into its investment strategy, financial planning and (if relevant) products

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection     | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------|---------------|
| PGS 42    | PLUS              | N/A          | N/A        | PUBLIC     | Climate change | General       |

**Which sectors are covered by your organisation’s strategy addressing high-emitting sectors?**

**(A) Coal**

Describe your strategy:

As part of our ethical and responsible approach, we have decided to exclude from the scope of our investment activities associated with coal mining and combustion.

- (B) Gas
- (C) Oil
- (D) Utilities
- (E) Cement
- (F) Steel
- (G) Aviation
- (H) Heavy duty road
- (I) Light duty road
- (J) Shipping
- (K) Aluminium
- (L) Agriculture, forestry, fishery
- (M) Chemicals
- (N) Construction and buildings
- (O) Textile and leather
- (P) Water
- (Q) Other
- (R) We do not have a strategy addressing high-emitting sectors

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection     | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------|---------------|
| PGS 43    | CORE              | N/A          | N/A        | PUBLIC     | Climate change | General       |

**Has your organisation assessed the resilience of its investment strategy in different climate scenarios, including one in which the average temperature rise is held to below 2 degrees Celsius (preferably to 1.5 degrees Celsius) above pre-industrial levels?**

- (A) Yes, using the Inevitable Policy Response Forecast Policy Scenario (FPS) or Required Policy Scenario (RPS)
- (B) Yes, using the One Earth Climate Model scenario
- (C) Yes, using the International Energy Agency (IEA) Net Zero scenario
- (D) Yes, using other scenarios
- (E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees**

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection     | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------|---------------|
| PGS 44    | CORE              | N/A          | N/A        | PUBLIC     | Climate change | General       |

**Does your organisation have a process to identify, assess, and manage the climate-related risks (potentially) affecting your investments?**

**(A) Yes, we have a process to identify and assess climate-related risks**

(1) Describe your process

Capital Grant Est has carried out an assessment of the potential risks that could significantly affect the activities of its holdings, and thus cause financial damage. These identified risks have been grouped together in a risk map in the same way as a financial risk map.

Before investing in a company, an ESG analysis will be carried out during the pre-investment phase for all projects under consideration, enabling Capital Grand Est to assess its exposure to physical or transitional risks.

This pre-investment assessment, carried out in particular using an analytical grid comprising some forty questions, enables us to establish an ESG profile and rating, and forms part of the systematic due diligence carried out prior to any investment. This assessment enables us to identify the strengths as well as the various major extra-financial risks (social, governance, physical, transition and loss of biodiversity) to which companies are exposed, which will then guide the dialogue conducted with the management of the holdings.

Moreover, in this phase of evaluating investment opportunities, a controversy review is carried out. Capital Grand Est ensures that minimum human rights guarantees are respected, in particular by making sure that investments do not contravene the United Nations' guiding principles on business and human rights.

Finally, Capital Grand Est's stakeholder engagement policy ensures ongoing communication with its investments, enabling it to rigorously monitor assessed risks and rapidly detect any new risks that may arise during the investment phase.

(2) Describe how this process is integrated into your overall risk management

Capital Grand Est has not yet formalized the integration of this process into its overall risk management.

**(B) Yes, we have a process to manage climate-related risks**

(1) Describe your process

When a risk is detected, a process is set in motion to mitigate it.

At management company level: the adoption of an exclusion policy enables Capital Grand Est to guard against certain sustainability risks:

- The exclusion of controversial activities and holdings. For example, the production or trading of tobacco, cannabis, weapons or ammunition, as well as the exclusion of pornography and all gambling businesses
- The exclusion of holdings based on sustainability criteria, such as holdings whose activity is associated with coal mining or coal-fired power generation, as well as activities linked to oil or gas production.

Investments:

- The risk detected is taken into account in the investment decision and may lead to not investing in the asset in question.
- By monitoring a company's overall performance, and identifying its areas of concern and therefore its risks, we can mitigate the risks to which it is exposed throughout the investment process.
- The implementation of a commitment policy enables Capital Grand Est to protect itself against extra-financial risks by engaging in dialogue with companies where appropriate.
- The implementation of continuous improvement plans with each investment enables Capital Grand Est to mitigate the various risks specific to each company.
- The controversy review enables Capital Grand Est to protect itself against reputational risks.

(2) Describe how this process is integrated into your overall risk management

Capital Grand Est has not yet formalized the integration of this process into its overall risk management.

- o (C) No, we do not have any processes to identify, assess, or manage the climate-related risks affecting our investments

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection     | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------|---------------|
| PGS 45    | CORE              | N/A          | N/A        | PUBLIC     | Climate change | General       |

**During the reporting year, which of the following climate risk metrics or variables affecting your investments did your organisation use and disclose?**

- (A) Exposure to physical risk
- (B) Exposure to transition risk
- (C) Internal carbon price
- (D) Total carbon emissions
- (E) Weighted average carbon intensity
- (F) Avoided emissions
- (G) Implied Temperature Rise (ITR)
- (H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals
- (I) Proportion of assets or other business activities aligned with climate-related opportunities
- (J) Other metrics or variables
- (K) Our organisation did not use or disclose any climate risk metrics or variables affecting our investments during the reporting year**  
Explain why: (Voluntary)

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection     | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------|---------------|
| PGS 46    | CORE              | N/A          | N/A        | PUBLIC     | Climate change | General       |

**During the reporting year, did your organisation disclose its Scope 1, Scope 2, and/or Scope 3 greenhouse gas emissions?**

- (A) Scope 1 emissions
- (B) Scope 2 emissions
- (C) Scope 3 emissions (including financed emissions)



- (D) Our organisation did not disclose its Scope 1, Scope 2, or Scope 3 greenhouse gas emissions during the reporting year

## SUSTAINABILITY OUTCOMES

| Indicator | Type of indicator | Dependent on | Gateway to          | Disclosure | Subsection              | PRI Principle |
|-----------|-------------------|--------------|---------------------|------------|-------------------------|---------------|
| PGS 47    | CORE              | N/A          | Multiple indicators | PUBLIC     | Sustainability outcomes | 1, 2          |

Has your organisation identified the intended and unintended sustainability outcomes connected to its investment activities?

- (A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities
- (B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities

Explain why:

We have not yet identified the sustainability issues associated with our investment activities, as the definition of a responsible investment strategy and the associated indicators are still relatively recent. In addition, Capital Grand Est remains a human-scale player in the investment sector, which may explain why we have not yet identified the sustainability issues linked to our investment activities.

## PRIVATE EQUITY (PE)

### POLICY

### INVESTMENT GUIDELINES

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection            | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-----------------------|---------------|
| PE 1      | CORE              | OO 21        | N/A        | PUBLIC     | Investment guidelines | 1 to 6        |

What private equity-specific ESG guidelines are currently covered in your organisation's responsible investment policy(ies)?

- (A) Guidelines on our ESG approach tailored to the sector(s) and geography(ies) where we invest
- (B) Guidelines on our ESG approach tailored to the strategy(ies) and company stage(s) where we invest, e.g. venture capital, buy-out and distressed
- (C) Guidelines on pre-investment screening
- (D) Guidelines on minimum ESG due diligence requirements
- (E) Guidelines on our approach to ESG integration into short-term or 100-day plans (or equivalent)
- (F) Guidelines on our approach to ESG integration into long-term value-creation efforts
- (G) Guidelines on our approach to monitoring ESG risks, ESG opportunities and ESG incidents
- (H) Guidelines on our approach to ESG reporting
- (I) Our responsible investment policy(ies) does not cover private equity-specific ESG guidelines

## FUNDRAISING

### COMMITMENTS TO INVESTORS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection               | PRI Principle |
|-----------|-------------------|--------------|------------|------------|--------------------------|---------------|
| PE 2      | CORE              | OO 21        | N/A        | PUBLIC     | Commitments to investors | 1, 4          |

For all of the funds that you closed during the reporting year, what type of formal responsible investment commitments did you make in Limited Partnership Agreements (LPAs), side letters or other constitutive fund documents?

- (A) We incorporated responsible investment commitments in LPAs (or equivalent) as a standard default procedure
- (B) We added responsible investment commitments in LPAs (or equivalent) upon clients' request
- (C) We added responsible investment commitments in side letters upon clients' request
- (D) We did not make any formal responsible investment commitments for the relevant reporting year
- (E) Not applicable; we have not raised funds in the last five years

## PRE-INVESTMENT

### MATERIALITY ANALYSIS

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection           | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------------|---------------|
| PE 3      | CORE              | OO 21        | PE 3.1     | PUBLIC     | Materiality analysis | 1             |

During the reporting year, how did you conduct ESG materiality analysis for your potential private equity investments?

- (A) We assessed ESG materiality at the portfolio company level, as each case is unique
  - Select from dropdown list
    - (1) for all of our potential private equity investments
    - (2) for the majority of our potential private equity investments
    - (3) for a minority of our potential private equity investments
  - (B) We performed a mix of industry-level and portfolio company-level ESG materiality analyses
  - (C) We assessed ESG materiality at the industry level only
  - (D) We did not conduct ESG materiality analyses for our potential private equity investments

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection           | PRI Principle |
|-----------|-------------------|--------------|------------|------------|----------------------|---------------|
| PE 3.1    | CORE              | PE 3         | N/A        | PUBLIC     | Materiality analysis | 1             |

**During the reporting year, what tools, standards and data did you use in your ESG materiality analysis of potential private equity investments?**

- (A) We used GRI standards to inform our private equity ESG materiality analysis
- (B) We used SASB standards to inform our private equity ESG materiality analysis
- (C) We used the UN Sustainable Development Goals (SDGs) to inform our private equity ESG materiality analysis
- (D) We used environmental and social factors detailed in the IFC Performance Standards (or other similar standards used by development-focused financial institutions) in our private equity ESG materiality analysis
- (E) We used climate disclosures, such as the TCFD recommendations or other climate risk and/or exposure analysis tools, to inform our private equity ESG materiality analysis
- (F) We used the UN Guiding Principles on Business and Human Rights (UNGPs) to inform our private equity ESG materiality analysis
- (G) We used geopolitical and macro-economic considerations in our private equity ESG materiality analysis
- (H) We engaged with the prospective portfolio company to inform our private equity ESG materiality analysis
- (I) Other  
Specify:

The materiality of ESG criteria was carried out with an external service provider, expert in the evaluation and extra-financial analysis of listed and unlisted companies.

## DUE DILIGENCE

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection    | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---------------|---------------|
| PE 4      | CORE              | OO 21        | N/A        | PUBLIC     | Due diligence | 1             |

**During the reporting year, how did material ESG factors influence the selection of your private equity investments?**

- (A) Material ESG factors were used to identify risks  
Select from dropdown list
  - (1) for all of our potential private equity investments
  - (2) for the majority of our potential private equity investments
  - (3) for a minority of our potential private equity investments
- (B) Material ESG factors were discussed by the investment committee (or equivalent)  
Select from dropdown list
  - (1) for all of our potential private equity investments
  - (2) for the majority of our potential private equity investments
  - (3) for a minority of our potential private equity investments
- (C) Material ESG factors were used to identify remedial actions for our 100-day plans (or equivalent)
- (D) Material ESG factors were used to identify opportunities for value creation
- (E) Material ESG factors informed our decision to abandon potential investments in the due diligence phase in cases where ESG risks were considered too high to mitigate
- (F) Material ESG factors impacted investments in terms of the price offered and/or paid
- (G) Material ESG factors did not influence the selection of our private equity investments

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection    | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---------------|---------------|
| PE 5      | CORE              | OO 21        | N/A        | PUBLIC     | Due diligence | 1             |

Once material ESG factors have been identified, what processes do you use to conduct due diligence on these factors for potential private equity investments?

- (A) We do a high-level or desktop review using an ESG checklist for initial red flags
  - Select from dropdown list
    - (1) for all of our potential private equity investments
      - (2) for a majority of our potential private equity investments
      - (3) for a minority of our potential private equity investments
    - (B) We send detailed ESG questionnaires to target companies
    - (C) We hire third-party consultants to do technical due diligence on specific material ESG factors
    - (D) We conduct site visits
    - (E) We conduct in-depth interviews with management and/or personnel
    - (F) We conduct detailed external stakeholder analyses and/or engagement
    - (G) We incorporate ESG due diligence findings in all of our relevant investment process documentation in the same manner as other key due diligence, e.g. commercial, accounting and legal
    - (H) Our investment committee (or an equivalent decision-making body) is ultimately responsible for ensuring all ESG due diligence is completed in the same manner as for other key due diligence, e.g. commercial, accounting, and legal
    - (I) Other
      - (J) We do not conduct due diligence on material ESG factors for potential private equity investments

## POST-INVESTMENT

### MONITORING

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| PE 6      | CORE              | OO 21        | PE 6.1     | PUBLIC     | Monitoring | 1             |

During the reporting year, did you track one or more KPIs on material ESG factors across your private equity investments?

- (A) Yes, we tracked KPIs on environmental factors
  - Percentage of portfolio companies this applies to:
    - (1) >0 to 10%
    - (2) >10 to 50%
    - (3) >50 to 75%
    - (4) >75 to 95%
    - (5) >95%
- (B) Yes, we tracked KPIs on social factors
  - Percentage of portfolio companies this applies to:
    - (1) >0 to 10%
    - (2) >10 to 50%
    - (3) >50 to 75%
    - (4) >75 to 95%
    - (5) >95%
- (C) Yes, we tracked KPIs on governance factors

Percentage of portfolio companies this applies to:

- (1) >0 to 10%
  - (2) >10 to 50%
  - (3) >50 to 75%
  - (4) >75 to 95%
  - (5) >95%
- (D) We did not track KPIs on material ESG factors across our private equity investments

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| PE 6.1    | PLUS              | PE 6         | N/A        | PUBLIC     | Monitoring | 1             |

**Provide examples of KPIs on material ESG factors you tracked across your private equity investments during the reporting year.**

(A) ESG KPI #1

Formalization of a structured CSR strategy, including an action plan or objectives covering social, environmental and stakeholder issues.

(B) ESG KPI #2

Formalizing a business conduct and anti-corruption policy

(C) ESG KPI #3

Feminization of teams and governance bodies

(D) ESG KPI #4

Employee training rate (%)

(E) ESG KPI #5

Formalizing an environmental policy (issues and objectives)

(F) ESG KPI #6

Integrating environmental criteria into purchasing/subcontracting practices

(G) ESG KPI #7

Intrusion testing of IT systems

(H) ESG KPI #8

(I) ESG KPI #9

(J) ESG KPI #10

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| PE 7      | CORE              | OO 21        | PE 7.1     | PUBLIC     | Monitoring | 1, 2          |

**What processes do you have in place to support meeting your targets on material ESG factors for your private equity investments?**

**(A) We use operational-level benchmarks to assess and analyse the performance of portfolio companies against sector performance**

Select from dropdown list

- (1) for all of our private equity investments**
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

(B) We implement international best practice standards, such as the IFC Performance Standards, to guide ongoing assessments and analyses

(C) We implement certified environmental and social management systems across our portfolio

**(D) We make sufficient budget available to ensure that the systems and procedures needed are established**

Select from dropdown list

- (1) for all of our private equity investments**
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

**(E) We hire external verification services to audit performance, systems, and procedures**

Select from dropdown list

- (1) for all of our private equity investments**
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

(F) We conduct ongoing engagement with all key stakeholders at the portfolio company level, e.g. local communities, NGOs, governments, and end-users

(G) We implement 100-day plans, ESG roadmaps and similar processes

(H) Other

(I) We do not have processes in place to help meet our targets on material ESG factors for our private equity investments

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| PE 7.1    | PLUS              | PE 7         | N/A        | PUBLIC     | Monitoring | 1, 2          |

**Describe up to two processes you have put in place during the reporting year to help meet your targets on material ESG factors.**

(A) Process one

Capital Grand Est uses an external service provider (EthiFinance) as part of an ESG evaluation and scoring process for its portfolio, available in its CSR report. The purpose of this report is to provide a snapshot of the ESG performance of the fund and its holdings. It is based on each investment's responses to an ESG questionnaire, which is based on a reference framework developed jointly with EthiFinance. Companies are rated on a scale from 0 to 100. The aggregation of their scores, taking into account the respective weight of the holdings in the portfolio, enables the fund to be evaluated.

This process provides a dynamic view of the fund's ESG performance, enabling it to improve on certain criteria and achieve new ESG objectives.

(B) Process two

Capital Grand Est calls on an external service provider (EthiFinance) to carry out in-depth analyses in the form of due diligence on some of its holdings throughout the investment process.

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| PE 9      | CORE              | OO 21        | N/A        | PUBLIC     | Monitoring | 1, 2          |

**Post-investment, how do you manage material ESG risks and ESG opportunities to create value during the holding period of your investments?**

- (A) We develop company-specific ESG action plans based on pre-investment research, due diligence and materiality findings
- (B) We adjust our ESG action plans based on performance monitoring findings at least yearly
- (C) We, or the external advisors that we hire, support our private equity investments with specific ESG value-creation opportunities
- (D) We engage with the board to manage ESG risks and ESG opportunities post-investment**
  - Select from dropdown list
    - (1) for all of our private equity investments
    - (2) for a majority of our private equity investments
    - (3) for a minority of our private equity investments**
- (E) Other
- (F) We do not manage material ESG risks and opportunities post-investment

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| PE 10     | PLUS              | OO 21        | N/A        | PUBLIC     | Monitoring | 1, 2          |

**Describe how you ensure that material ESG risks are adequately addressed in the private equity investments in which you hold a minority stake.**

Capital Grand Est carries out an annual extra-financial assessment of its portfolio, in order to provide specific support and monitoring. In collaboration with EthiFinance, Capital Grand Est has defined a set of indicators (updated annually). Using data collected from companies and interviews with management, Capital Grand Est analyzes and rates the extra-financial performance and key ESG indicators of our portfolio.

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| PE 11     | PLUS              | OO 21        | N/A        | PUBLIC     | Monitoring | 2             |

**Describe how your ESG action plans are currently defined, implemented and monitored throughout the investment period.**

We don't yet have enough experience to clarify this point.

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| PE 12     | CORE              | OO 21        | PE 12.1    | PUBLIC     | Monitoring | 1, 2          |

**How do you ensure that adequate ESG-related competence exists at the portfolio company level?**

- (A) We assign the board responsibility for ESG matters
  - Select from dropdown list
    - (1) for all of our private equity investments
      - (2) for a majority of our private equity investments
      - (3) for a minority of our private equity investments
  - (B) We ensure that material ESG matters are discussed by the board at least yearly
  - (C) We provide training on ESG aspects and management best practices relevant to the portfolio company to C-suite executives only
  - (D) We provide training on ESG aspects and management best practices relevant to the portfolio company to employees (excl. C-suite executives)
  - (E) We support the portfolio company in developing and implementing its ESG strategy
  - (F) We support portfolio companies by finding external ESG expertise, e.g. consultants or auditors
  - (G) We share best practices across portfolio companies, e.g. educational sessions or the implementation of environmental and social management systems
  - (H) We include penalties or incentives to improve ESG performance in management remuneration schemes
  - (I) Other
    - (J) We do not ensure that adequate ESG-related competence exists at the portfolio company level

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| PE 12.1   | PLUS              | PE 12        | N/A        | PUBLIC     | Monitoring | 1, 2          |

**Describe up to two initiatives taken as part of your ESG competence-building efforts at the portfolio company level during the reporting year.**

(A) Initiative 1



Capital Grand Est is committed to supporting its holdings in the implementation of best social practices. To this end, Capital Grand Est provides its holdings with detailed reports on their overall ESG performance, as well as areas for improvement on certain key indicators. These may include social indicators such as the percentage of women in the workforce, workplace accidents, or the training rate (%).

(B) Initiative 2

Compliance with best environmental practices is a key issue in sustainable development and risk management. Capital Grand Est encourages the implementation of environmental initiatives. Similar to the initiative on social practices, Capital Grand Est provides portfolio companies with reports on their achievements and areas for improvement concerning environmental criteria and issues. For example, monitoring of energy consumption, implementation of action plans to save energy and reduce greenhouse gas emissions, or initiatives to reduce the quantity of inputs.

## EXIT

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection | PRI Principle |
|-----------|-------------------|--------------|------------|------------|------------|---------------|
| PE 13     | CORE              | OO 21        | N/A        | PUBLIC     | Exit       | 4, 6          |

**During the reporting year, what responsible investment information was shared with potential buyers of private equity investments?**

- (A) Our firm's high-level commitment to responsible investment, e.g. that we are a PRI signatory
- (B) A description of what industry and asset class standards our firm aligns with, e.g. TCFD
- (C) Our firm's responsible investment policy (at minimum, a summary of key aspects and firm-specific approach)
- (D) Our firm's ESG risk assessment methodology (topics covered in-house and/or with external support)
- (E) The outcome of our latest ESG risk assessment on the asset or portfolio company
- (F) Key ESG performance data on the asset or portfolio company being sold
- (G) Other
- (H) No responsible investment information was shared with potential buyers of private equity investments during the reporting year
- (I) **Not applicable; we had no sales process (or control over the sales process) during the reporting year**

## DISCLOSURE OF ESG PORTFOLIO INFORMATION

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection                              | PRI Principle |
|-----------|-------------------|--------------|------------|------------|---|---------------|
| PE 14     | CORE              | OO 21        | N/A        | PUBLIC     | Disclosure of ESG portfolio information | 6             |

**During the reporting year, how did you report your targets on material ESG factors and related data to your investors?**

- (A) We used a publicly disclosed sustainability report
- (B) We reported in aggregate through formal reporting to investors
- (C) **We reported at the portfolio company level through formal reporting to investors**
- (D) We reported through a limited partners advisory committee (or equivalent)
- (E) **We reported back at digital or physical events or meetings with investors**
- (F) We had a process in place to ensure that reporting on serious ESG incidents occurred
- (G) Other

- (H) We did not report our targets on material ESG factors and related data to our investors during the reporting year

# CONFIDENCE-BUILDING MEASURES (CBM)

## CONFIDENCE-BUILDING MEASURES

### APPROACH TO CONFIDENCE-BUILDING MEASURES

| Indicator | Type of indicator | Dependent on | Gateway to          | Disclosure | Subsection                               | PRI Principle |
|-----------|-------------------|--------------|---------------------|------------|--|---------------|
| CBM 1     | CORE              | N/A          | Multiple indicators | PUBLIC     | Approach to confidence-building measures | 6             |

#### How did your organisation verify the information submitted in your PRI report this reporting year?

- (A) We conducted independent third-party assurance of selected processes and/or data related to the responsible investment processes reported in our PRI report, which resulted in a formal assurance conclusion
- (B) We conducted a third-party readiness review and are making changes to our internal controls or governance processes to be able to conduct independent third-party assurance next year
- (C) We conducted an internal audit of selected processes and/or data related to the responsible investment processes reported in our PRI report
- (D) Our board, trustees (or equivalent), senior executive-level staff (or equivalent), and/or investment committee (or equivalent) signed off on our PRI report**
- (E) We conducted an external ESG audit of our holdings to verify that our funds comply with our responsible investment policy
- (F) We conducted an external ESG audit of our holdings as part of risk management, engagement identification or investment decision-making
- (G) Our responses in selected sections and/or the entirety of our PRI report were internally reviewed before submission to the PRI**
- (H) We did not verify the information submitted in our PRI report this reporting year

## INTERNAL REVIEW

| Indicator | Type of indicator | Dependent on | Gateway to | Disclosure | Subsection      | PRI Principle |
|-----------|-------------------|--------------|------------|------------|-----------------|---------------|
| CBM 6     | CORE              | CBM 1        | N/A        | PUBLIC     | Internal review | 6             |

#### Who in your organisation reviewed the responses submitted in your PRI report this year?

- (A) Board, trustees, or equivalent
  - (B) Senior executive-level staff, investment committee, head of department, or equivalent**
- Sections of PRI report reviewed
- (1) the entire report**
  - (2) selected sections of the report

- (C) None of the above internal roles reviewed selected sections or the entirety of the responses submitted in our PRI report this year