




FORM TO BE FILLED IN WHEN MARKETING IN FRANCE UCITS ESTABLISHED UNDER FOREIGN LAW THAT TAKES INTO ACCOUNT EXTRA-FINANCIAL CRITERIA OR WHEN MODIFYING THE EXTRA-FINANCIAL APPROACH OF A FUND ALREADY MARKETING (POSITION RECOMMENDATION – DOC-2020-03)

1. Identification of the product (or compartment, if applicable)

1. LEI code

2. ISIN Code(s) 

3. Name of the fund concerned:

4. Does the UCITS have compartments? Yes No

5. If applicable, name of compartment:

2. Identification of the asset management company completing this questionnaire and of the distributors of the product

1. Name of management company

2. Name of the distributors of the product in France 

3. Nature of the communication expected in the regulatory documentation

Any mention of extra-financial characteristics:

- in the denomination is considered as a central communication;
- in the DICI/DIC is considered alternatively as a central or reduced communication according to the conciseness, balance and positioning of the communication;
- in the commercial documentation is considered alternatively as a central or reduced communication according to the conciseness of the communication;

1. Does the product communicate centrally or in a reduced form on the consideration of extra-financial characteristics in management within the meaning of position recommendation 2020-03?

Yes - Central communication

Yes - Reduced communication

Form to be filled in when marketing in France UCITS established under foreign law that takes into account extra-financial criteria or when modifying the extra-financial approach of a fund already marketed (Position Recommendation – DOC-2020-03)

2. In the case of central or reduced communication on the taking into account of extra-financial characteristics, mention of consideration of extra-financial characteristics :

2.1. In the name? Yes - Central - communication No

2.2. In the KIID/KID ? 

Yes beyond a concise, balanced communication and positioned in the section "Other information" - Central communication

Yes through a concise, balanced communication and positioned in the section "Other information" - Reduced communication

No

2.2.1 In case of reduced communication, Extract of the statement presenting the extra-financial characteristics of the product in the section "Other information" of the DICI / DIC

2.3 In the marketing materials?

Yes beyond a concise mention - Central communication

Yes through a concise manner (secondary, neutral and limited to less than 10% of the volume occupied by the presentation of the product's investment strategy) - Reduced communication

No

2.3.1 In case of reduced communication, Extract of the statement presenting the extra-financial characteristics of the product in the commercial documentation

The rest of the form is to be completed only when the answer « Central communication » or « Reduced communication » to question 1

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4. Nature of the modification to take into account extra-financial criteria in the management carried out

Only for funds communicating centrally on extra-financial features :

Position No 2 of Position-Recommendation 2002-03

1. Within the meaning of paragraph (b) of this position, the approach taken is:

2. Within the meaning of paragraph (c) of this position, the extra-financial analysis rate is over 90%?	Yes	No
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If the answer to question 4.1 is « Improved rating », then the following should be added to the answer to question 3.1

3. Exclusion rate from the investment universe for calculating the average benchmark score against which the Portfolio will be compared (<i>elimination at least 20% of the least well-rated securities</i>)	%
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If the answer to question 4.1 is « In selectivity »

4. Selectivity rate used (<i>reduction of at least 20% of the investment universe</i>)	%
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If the answer to question 4.1 is « Other approach »

5. Does this alternative approach correspond to one of the approaches described in section 2 of AMF Position-Recommendation AMF 2020-03 (<i>funds of funds, green bonds funds, other non-financial indicators ...</i>)?	Yes	No
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6. Specify the type of approach chosen (*funds of funds, green bonds funds...*)?

- Funds of funds,
- greens bond funds,
- other non-financial indicators :
 - o Environmental factor: greenhouse gas emissions from issuers, volumes of waste produced or recycled, volumes of water consumed or recycled, total or renewable energy consumption, etc.
 - o Social factor: gender equity in the management of the company (share of women in the Comex...), employment rate of people with disabilities, frequency of accidents within the company, overall tax rate...
 - o Governance factor: number or percentage of independent directors, compensation policies, etc.

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Only for funds with reduced communication on extra-financial characteristics :

Position No 2 bis of Position-Recommendation 2002-03

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|----|---|-----|----|
| 1. | Within the meaning of paragraph (b) of this position, the average rating or indicator of the collective investment is higher than the average rating or indicator of the investment universe : | Yes | No |
| | | | |
| 2. | Within the meaning of paragraph (c) of this position, the extra-financial analysis rate is over than : | | |
| | - 90% for equities issued by large capitalisations whose headquarters is located in "developed" countries, debt securities and money market instruments with an investment grade credit rating, sovereign debt issued by developed countries? | Yes | No |
| | - 75% for equities issued by large caps headquartered in "emerging" countries, equities issued by small and mid caps, debt securities and money market instruments with a high yield credit rating and sovereign debt issued by "emerging" countries? | Yes | No |

For SRI funds only:

Position No. 2 (d) of Position-Recommendation 2020-03

- | | | |
|----|--|--------------------------------|
| 3. | Does extra-financial analysis simultaneously take into account environmental, social and governance factors? | Yes
No it's not an SRI fund |
|----|--|--------------------------------|

Position No. 6 of Position-Recommendation 2020-03

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|----|---|
| 4. | If the fund does not benefit from the "SRI/ISR" label, please fill in the warning, to be presented in very visible characters in the fund's marketing materials in accordance with position no. 7 of the Position-Recommendation 2020-03. |
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Form to be filled in when marketing in France UCITS established under foreign law that takes into account extra-financial criteria or when modifying the extra-financial approach of a fund already marketed (Position Recommendation – DOC- 2020-03)

5. Information in regulatory and commercial documents

Only for funds communicating centrally on extra-financial features :

Position No. 3 of the Position-Recommendation 2020-03, if the methodological of the extra-financial strategy are significant:

1. Which document refers to these methodological limitations?

No significant methodological limitations	KIID/KID
Prospectus	Marketing materials

Position No. 4 of Position-Recommendation 2020-03, which documents mention:

2. The minimum measurable objectives adopted pursuant to position No. 2

KIID/KID	Prospectus
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3. The minimum rate of extra-financial analysis of the portfolio

KIID/KID	Prospectus
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4. The investment universe based on which non-financial analysis is performed

The AMC does not use such a measure to judge materiality

KIID/KID	Prospectus
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To be completed when the answer « No » has been given to one of the question in section 4

6. Warning in the commercial documentation referred to in accordance with position No. 7

1. Extract from the marketing materials with the warning

Send the formulaire to AMF-UCITS@amf-france.org