



BNP PARIBAS
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AXA IM Select

Responsible Investment

Policy

2025



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1. Scope of the policy

AXA IM Select is a business unit of AXA Investment Managers (IM) with €32.7 billion of assets under management and advised (as at 31 December 2024). Established in 2008, it focuses on asset management and is therefore involved in UCI management, portfolio management, investment advice, fund research and building retail investment solutions. AXA IM Select is dedicated to recommending funds and building multi manager retail solutions for clients across Europe and Asia.

References to 'AXA IM Select' in this document - unless specified - refer to Architas Multi-Manager Europe Limited (AMMEL) trading as "AXA IM Select Ireland" in Ireland, AXA IM Select France in France, AXA IM Select Asia Limited in Hong Kong, AXA IM Select Belgium in Belgium and AXA IM Select UK business unit in UK with the ultimate parent and controlling company being BNP Paribas Group as of 1 July 2025. Prior to 1 July 2025, the ultimate parent and controlling company was AXA SA (a company registered in France). AXA Investment Managers (AXA IM) Select France is an investment company approved by the AMF on 22 June 2010 under n°GP 10000025 and had assets under management and advisory totalling €15.5 billion at the end of December 2024.

2. Purpose of the policy

The purpose of this Responsible Investment (RI) policy is to articulate AXA IM Select's approach and practices when it comes to responsible investing. The implementation of the RI policy is part of AXA IM Select's commitments and values. As a global asset manager, AXA IM Select has a duty to act in the best interests of its clients, shareholders and other stakeholders. As a member of the BNP Paribas Group as of 1 July 2025, AXA IM Select follows the Group's purpose to achieve long-term sustainable returns for its clients by placing sustainability at the heart of its strategy and investment philosophy.

3. Responsible Investment approach

AXA IM Select engages in responsible investment because it believes that financially-material ESG considerations can affect returns of risk-adjusted investments in the medium and long term. AXA IM Select is in a unique position to influence and direct capital and finance towards positive contributions to the environment and society, thereby facilitating the transition to a sustainable economy. It is therefore important that i) the funds that are selected and managed are aligned with this view in terms of their ability to identify, assess and manage both sustainability risks and opportunities and ii) AXA IM Select can effectively influence managers on their ESG journey and in turn they can effectively engage with issuers. In order to do so, the evolving AXA IM Select responsible investment framework is anchored on five pillars: i) ESG Due Diligence ii) ESG Exclusions iii) SFDR implementation iv) Active ownership including Voting and v) Sustainable products. Governance and Monitoring is embedded across all five pillars.

Key external frameworks, regulations and labels that shape some of the RI Approach are:

- United Nations Principles for Responsible Investment (UNPRI): "AXA IM Select" has been a signatory of the United Nations supported Principles for Responsible Investment since 2018 (then Architas), scoring 4* and 5* on all scored modules in the most recent assessment.
- Sustainable Finance Disclosure Regulation (SFDR)
- Investissement Socialement Responsable (ISR / SRI) label
- Greenfin label

AXA IM Select's responsible investment approach is summarised here: [Responsible Investing | AXAIM Select](#)



4. Responsible Investment governance

RI dedicated personnel

At AXA IM Select, RI professionals include two groups of employees: those that are dedicated to RI activities and involved in a full-time capacity, and those that are partially dedicated since RI related work is embedded in their day-to-day roles in other departments. Two of the common objectives amongst all the roles is to work with the investment teams to integrate ESG considerations into their investment processes and work with the product teams to embed ESG into product design, strategy and ongoing communication including with clients. The relevant experience of the dedicated individuals includes RI strategy and governance, fund and ESG research, qualitative and quantitative analysis, product positioning, in addition to more relevant RI experience.

The current roles dedicated to RI and roles with a strong contribution to RI are:

Team	Dedicated personnel
Investment*	<ul style="list-style-type: none">- Responsible Investment Lead (RI Lead)- RI Liaison Officers – Acting as ESG champions, one per each AXA IM Select location
Proposition	<ul style="list-style-type: none">- Head of ESG (<i>partially dedicated role, also Head of Proposition</i>)- ESG Proposition Manager
Performance & Reporting	Not dedicated Production and review of periodic regulatory documents
Compliance	Not dedicated Provide guidance and assess compliance with regulatory topics
Legal	Not dedicated Production and review of pre-contractual regulatory documents
Risk	Not dedicated Support and oversee ESG Risk Management including Investment Risk Monitoring team that monitors compliance against RI constraints
Data	Not dedicated Support data sourcing, data quality, data assessment and data infrastructure related issues
IT	Not dedicated Extracting and sending portfolio data to external service provider, as well as resolving any issues related to tools and systems.
Marketing	Not dedicated Collaborates with other teams to produce dedicated ESG reports and ESG marketing materials

*The following are additional key RI related activities undertaken within the Investment team:

- Chief Investment Officer (CIO) oversees and signs off on all RI related initiatives. RI Lead reports into the CIO.



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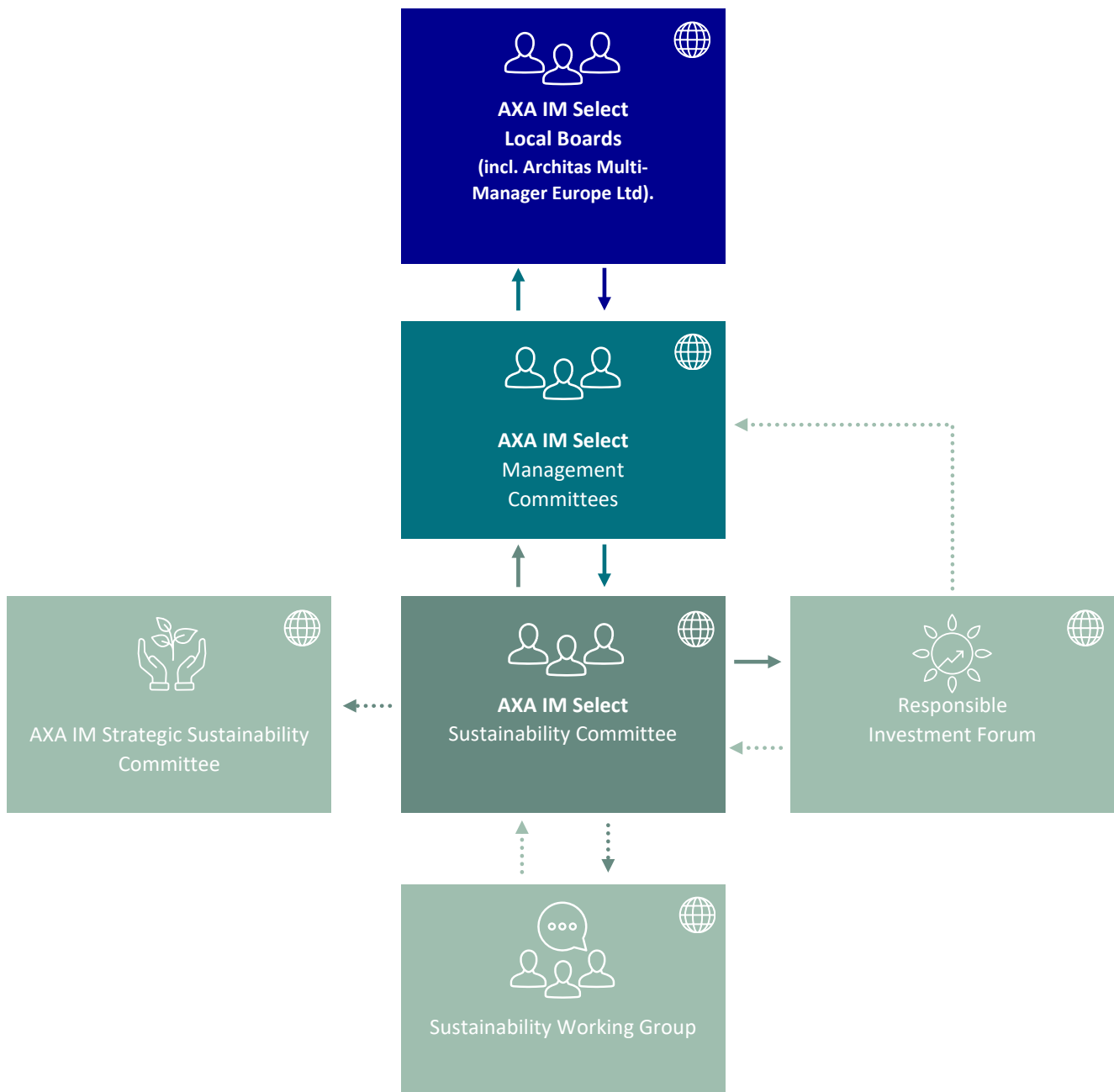
- Portfolio Managers are responsible for embedding and complying with all RI related constraints in their portfolios, e.g. ESG Exclusions and SFDR classification constraints
- Sector specialists conduct ESG due diligence at fund level
- Operational Due Diligence team conduct ESG due diligence at firm level
- Portfolio Managers are responsible for quarterly SFDR Principal Adverse Impact (PAI) Indicators Monitoring
- Engagement with fund managers can be undertaken by any member of the Investment Team responsible for that fund or fund manager



RI governance committees

AXA IM Select has established a governance framework around RI as shown in Figure 1 and explained below:

Figure 1: AXA IM Select RI Governance Committees





Committee	Role	Frequency
Key RI related committees at AXA IM Select		
Responsible Investment Forum	Attended by the global investment team this forum is chaired by the CIO along with the RI Lead. It is used for key RI updates and decision making with input from the investment team. Topics covered include ESG Products; ESG Due Diligence; SFDR related issues; ESG Data, Reporting and Research; Exclusions; RI policies and procedures and coordination with other governance bodies within AXA IM.	Monthly
AXA IM Select Sustainability Committee	The aim of this committee, chaired by the Head of ESG with the ESG Proposition Manager as the Secretariat, is to oversee all ESG activities (beyond RI as well) across AXA IM Select. It consists of 5 voting members. The main focus areas include: RI and ESG related policies, assessment of the impact across AXA IM Select of new ESG initiatives and effective promotion and adoption of ESG principles at the investment and corporate levels.	Quarterly
Sustainability Working Group	This Working Group is chaired by the RI Lead with the ESG Proposition Manager as the Secretariat. The aim of this working group is to inform, discuss and debate any ESG issues in a cross-functional set up bringing together various AXA IM Select Teams. Permanent attendees include representative from Compliance, Legal, Risk, Proposition, Investment, Reporting & Data team.	Bi-Monthly
AXA IM Strategic Sustainability Committee	AXA IM Level monthly committee, chaired by the Special advisor to the AXAIM General Secretary, brings together all four Business Units of AXA IM to discuss, inform and validate relevant Sustainability updates, news and frameworks. The aim is to increase information sharing, maintain one source of decision making and consistency where possible across Business units.	Monthly

5. Responsible Investment Framework – Five Pillars

At AXA IM Select, the Responsible Investment (RI) Framework is built on the intention of ESG integration. AXA IM Select defines ESG integration as the integration of environmental, social and governance considerations into investment analysis, management and decisions in the belief that these ESG factors can have a material impact on financial performance, in line with the UN PRI definition. This enables AXA IM Select to analyse each investment's ability to create, sustain and protect value with the aim of ensuring it can deliver returns in line with its clients' expectations. AXA IM Select's integration of ESG issues in investment processes relies on five pillars: i) ESG Due Diligence ii) ESG Exclusions iii) SFDR implementation iv) Active ownership including Voting and v) Sustainable products. Governance and Monitoring is embedded across all five pillars.

ESG Due Diligence (ESG DD)

The ESG Due Diligence process is a mandatory part of the investment process at AXA IM Select, in which the investment team qualitatively assesses firms and underlying funds' RI credentials using proprietary assessments which results in a RAG (Red / Amber / Green) rating for firms and an ESG score for each fund. AXA IM Select applies stringent minimum thresholds to ensure that portfolios consist of funds / mandates that are less likely to be exposed to unmanaged ESG risks and, where appropriate, make a positive contribution to environment and



society. These ESG risks are potential pitfalls that would not be identified by traditional financial analysis alone. The purpose of these scores is to provide managers with information about the ESG quality of mutual funds, in order to seek to improve the ESG footprint of offerings where possible.

ESG DD is undertaken in two parts: the ESG Operational Due Diligence (ODD) assessment which is focused at firm level and ESG Investment Due Diligence (IDD) assessment focused at fund level.

- **ESG ODD assessment at firm level:** The areas covered include policies, firm level processes, governance, training, Key Performance Indicators (KPIs) and firm level sustainability commitments. As it is a self-assessment, firms are provided with an ESG specific questionnaire as part of the overall ODD process. They must complete and submit this questionnaire along with any evidence requested, such as their policies. Depending on the responses, the AXA IM Select ODD team can choose to follow up with a discussion with the firm being assessed. The responses are assessed and a RAG rating outcome is finalised. Amber and Green rated firms' funds are eligible for investment. However, Red rated firms' funds are considered ineligible for investment (unless there is a reasonable case for an exemption from this rule which would go through approval at the RI Forum) and the firm cannot be used for any delegated mandates. Red rated firms can be those without an RI policy or without a dedicated RI resource or with unsatisfactory ESG integration at firm level. The list of firms and their latest assessment outcomes are stored on a Sharepoint site for the investment team to access. The assessment is refreshed at least every two years. On an ongoing basis, Asset Managers are monitored in the media for possible adverse news with regards to their commitment to ESG initiatives and involvement in greenwashing practices.
- **ESG IDD assessment at fund / mandate level:** This is a qualitative self-assessment of funds or mandates based on a questionnaire completed by fund managers and comprises three scored sections that have their own weights and cover the following areas specifically at fund level:
 - i) ESG integration that includes ESG approach, evidence of implementation of ESG approach and any consideration of impact
 - ii) Engagement and stewardship that includes an engagement framework, how engagement is tracked and success measured and evidence of active ownership effecting investment decisions.
 - iii) Risk and reporting includes ESG risk monitoring, ESG KPIs, ESG reporting and consideration of climate risk and biodiversity.

The output of the assessment is an ESG score awarded to each fund / mandate. Currently the total score is out of 5, however this is subject to change. ESG score thresholds are defined which all funds / mandates – new and invested – must meet in order to be eligible for investment and if an invested fund / mandate's score drops below the ESG Score threshold, there is an escalation process defined which can ultimately lead to removal from approved buy lists. There are two ESG Score thresholds used at AXAIM Select currently – one for SFDR Article 6 and Article 8 funds / mandates: to score 2 out of 5 and one for SFDR Article 9 funds / mandates: to score 3 out of 5. The assessment is mandatory for all new and invested funds / mandates and the due diligence is carried out as part of the wider Investment Due Diligence for new funds or as part of monitoring funds. The assessment is refreshed at least every eighteen months. Using collected information – via the questionnaire and dedicated discussions with the fund manager if needed – sector analysts will form a view on the robustness of the ESG process (including peer comparison) and present findings back to the investment team.



A tailored questionnaire is used for ESG Passive funds¹ and follows the same process of requiring to meet the ESG Score Threshold to be eligible for investment. Non-ESG Passive Funds do not require a complete ESG DD due to the nature of the fund – however, it relies on firm level ratings and only passive funds from firms rated amber or green are eligible investment.

ESG Exclusions

At AXA IM Select, implementation of ESG exclusions is a key pillar of achieving responsible investment. Aside from exclusions based on ESG scores as described in the ESG DD section, AXA IM Select applies a range of sectorial or normative exclusion policies. By doing so, the exposure to ESG risk areas is reduced and this enables better management of sustainability risks and principal adverse impacts (PAI).

The exclusion areas cover environment, social and governance risks:

- **Environment:** Climate (coal mining and coal-based energy production; oil sands production and oil sands related pipelines), biodiversity (palm oil production) or soft commodities (food commodities derivatives);
 - **Social:** Health (tobacco production) and human rights (violations of United Nations Global Compact (“UNGC”); controversial weapons manufacturing)
 - **Governance:** Business ethics (UNGC breach).
- The exclusion lists are developed and regularly updated by the relevant central RI teams based on data provided by third party providers which are then shared with AXAIM Select.

Scope

- Funds of Mandates: Majority of our funds of mandates apply an Exclusion List. Whether a fund will be in the scope of funds that apply it, is determined in collaboration with the relevant Portfolio Manager and Clients. The AXA IM Exclusion Policy and List, as further detailed [here](#), is applied by default. However exceptions can be made based on the type of product and Client requirements to apply AXA Group Exclusion Policy and List, as further detailed [here](#).
- Funds of funds: While proprietary exclusions cannot be applied to external funds open to different investors, AXA IM Select monitors alignment of funds’ exclusion areas vs AXA exclusion areas with special attention to exclusions related to thermal coal.

Further information about the AXA IM Exclusion Policy can be found here: [Our Sustainability policies, methodologies & reports | AXA IM Corporate](#)

Further information about the exclusions within AXA can be found here: [Responsible investment | AXA](#)

Sustainable Finance Disclosure Regulation (SFDR) implementation

Since the introduction of SFDR in March 2021, teams across AXA IM Select departments have worked collaboratively to form a strategic view on the AXA IM Select SFDR framework and implement the required changes which includes new processes, systems and tools. All SFDR specific information for funds can be found [here](#) or in the process manual documents of each department where relevant. Information related to the various articles (articles 3, 4, 5, 6, 10) that are requirements of the SFDR regulation are published on the AXA IM Select websites for [Ireland](#) and [France](#). In addition, there is a detailed SFDR Framework document maintained internally to capture all SFDR related approaches for AXA IM Select from Investment constraints to guidance on Legal documentation.

¹ This refers to passive funds that are either classified SFDR Article 8 or 9, and / or have ESG related words in the fund name.



Active ownership – Engagement and Voting

Engagement

As a multi-manager, AXA IM Select is in a unique position to influence and direct capital and finance towards positive contributions to the environment and society, thereby facilitating the transition to a sustainable economy. One of the key approaches to achieve the same is via engagement. AXA IM Select engagement approach fits into the overall AXA IM Engagement policy ([Our Sustainability policies, methodologies & reports | AXA IM Corporate](#)) which frame the philosophy but to take into consideration the specificities of each asset classes managed by all AXA IM's business units.

The AXA IM Select Engagement Framework covers i) Engagement with fund and delegated managers ii) Engagement with clients iii) Industry initiatives. This can help to influence, promote and steer towards better ESG integration practices. The approach to engagement is outlined in the AXA IM Select Engagement Framework which is maintained internally.

Voting

AXA IM Select applies the AXA IM Voting Policy for assets it holds directly and those that are held through a delegated manager in Funds of Mandates. Records of AXA IM Select's voting activity for these assets are available on request.

Publication of voting policy results

AXA IM Select France's engagement policy and its annual voting report for the 2024 financial year are available here: [Legal & Regulatory Information | AXA IM](#)

Sustainable products

At AXA IM Select, currently Sustainable products are made up of the following five categories of products: i) Label ISR products ii) Label Greenfin products iii) Funds with an approach based on meaningful engagement as complying with the Position n°2 of the AMF Position-Recommandation DOC-2020-03 iv) Advisory portfolios mainly composed of funds with an approach based on meaningful engagement as complying with the Position n°2 of the AMF Position-Recommandation DOC-2020-03 and v) SFDR classified Article 8 and Article 9 products.

AXA IM Select France currently has funds labelled by the French state. The following two labels have been implemented: "Investissement Socialement Responsable" (ISR / SRI) label and the Greenfin label. More information, including on the funds' compliance with labels and reporting, is available on the SRI [label](#) and Greenfin [label websites](#). The AXA IM Select France teams will also check on a quarterly basis the list of funds with the SRI State label ([SRI Label - For sustainable and responsible investments](#)) and Greenfin ([The label Greenfin | Ministries Spatial Planning Ecological Transition](#)) to ensure that all the selected funds are always labelled.

- **ESG impact indicators used** - The impact indicators used are those which are used by the selected underlying UCIs. The update is annual.
- **Investor information support on responsible management** - AXA IM Select France has created a section on each fund on its website where investors can find regularly updated information on the ESG criteria taken into account, in particular through: ESG reporting updated at least once a year for labelled UCIs ; Monthly reporting including financial commentary and data; All regulatory documentation (KID, full prospectus, annual report, etc.).



Governance and monitoring

AXA IM Select believes the governance and monitoring of RI issues is a key component to achieving its aims. Aside from the dedicated personnel and governance bodies at firm level, AXA IM Select also focuses its efforts at fund level:

- **Investment team involvement:** Majority of the investment team are involved in RI practices such as ESG DD by sector specialists, ESG exclusions implementation by portfolio managers, SFDR implementation by all and ESG DD completion rate monitoring by analysts.
- **Reporting and monitoring of funds:** All funds / mandates are monitored on a frequency of between quarterly, semi-annually and annually as specified in the due diligence process. Aside from an update of the IDD note, this can include direct discussions with the managers therefore closely liaising on all ESG related issues as well. The monitoring of funds by portfolio managers includes checking current and future potential of compliance with any agreed constraints, e.g. fund label requirements and SFDR classification related requirements. It is worth noting that all agreed constraints are monitored by the Investment Risk Monitoring department at an agreed frequency.
- **Greenwashing:** Whilst the ESG DD processes are set up to undertake in-depth assessments of firms and funds / mandates from an RI perspective to ensure their ESG quality and credibility, AXA IM Select recognizes there can be outstanding risks. Hence the news for any greenwashing related alerts are monitored. At firm level, once the ODD team is alerted of possible greenwashing issues concerning Asset Managers invested and advised, contact with the Client Service Representative is made to obtain further details on the issue. Meanwhile independent research is also conducted on several industry media outlets. A note with initial details is shared internally with ManCo representatives as well as externally with all clients holding investments with the Asset Manager/s in focus. The Global ODD team is presented with findings and a request to approve an Amber rating for the Asset Manager/s. The ODD team continues to monitor the situation and the evolution of any investigation by regulatory and/or enforcement bodies and keeps internal and external stakeholders informed of any new development, including having discussions with the manager about updates if needed. Over time if the manager is able to demonstrate the issue has been addressed, the rating may then change and to do so, the formalised process of approval will be followed again. At fund level, if an alert is noted, the sector specialist is responsible for checking the issue with the fund manager. Next steps are determined based on the fund manager's actions in response to the alert, including presenting the case at the RI Forum if required.

6. ESG Risk management

In addition, as a portfolio management company, AXA IM Select maintains a permanent risk management function that is hierarchically and functionally independent of the other departments and covers the following missions: i) Advises and assists other departments and governing bodies; ii) Ensures the robustness and proper application of risk management systems; iii) Operational and financial implementation iv) Implements the risk management policy it has defined. Outlined below is some of the key functions related to ESG risk management.

Investment Risk Monitoring

AXA IM Select has a team dedicated to investment risk monitoring for all funds. The team are responsible for post-trade checks to ensure compliance with all agreed rules and constraints as per product prospectuses. For instance where relevant, risk management monitors i) the various Label ISR and Label Greenfin specific ratios on the labelled



funds and reports the controls carried out to the risk committee; ii) compliance against Exclusion Lists iii) the level of sustainable investment and iv) related thresholds of underlying Article 8 and Article 9 funds v) the minimum ESG qualitative score threshold. Periodic inspection is supported by the AXA IM audit.

Further, specifically for labelled funds:

- 1st level controls are taken care of by the operational functions as well as the configuration of constraints in AXA IM Select's front-to-back tools. The constraint on the percentage of Label ISR and Label Greenfin funds is set as an ex-ante in the front end. The referential team updates the fund labels in the Neoxam database quarterly in order to feed the ex-ante constraint engine as well as the risk management control files.
- The 2nd level controls are mainly carried out by the Compliance and Internal Control Manager, and aim to ensure that the 1st level controls have been carried out.
- The application of the SRI policy is integrated into this control system and is the subject of specific reports.

Compliance ESG control

AXA IM Select is also required to have a compliance function in charge of carrying out the following tasks:

- Advise and assist the company's teams to comply with the regulatory obligations of both the company and the products;
- The RI policies, procedures and their implementation are in scope for selection in the compliance monitoring programme, taking a risk-based approach.

ESG KPIs for governance reporting

As part of the integration of the European Union's sustainable finance duties, AXA IM Select has defined indicators to monitor the implementation of its ESG strategy. Since the end of 2023, each legal entity of AXA IM Select measures and reports key ESG indicators to local and global boards of directors and management committees.

Conflict of interests

AXA IM Select maintains a Conflicts of Interest Policy that includes in its scope potential conflicts relating to stewardship. AXA IM Select also expects its delegates to operate conflicts management in line with MiFID or equivalent local requirements. As AXA IM Select does not directly invest into particular companies, no specific conflicts relating to stewardship is encountered.

7. ESG Reporting

AXA IM Select contributes to multiple AXA IM firm level ESG reporting including AXA IM Stewardship Report. Two key ones are mentioned below.

UN Principles for Responsible Investment Reporting

AXA IM is a signatory to the United Nations Principles for Responsible Investment and as such at a periodic frequency completes its obligatory UNPRI Reporting. AXA IM Select as a Business Unit of AXA IM is in scope of the reporting and included in the same since 2025. The most recent report can be found on the AXA IM Responsible Investment website.



Publication of the Article 29 report on the French Energy-Climate Law

Article 29 of the French 2019 Energy-Climate Law changes the framework established by Article 173 of the 2015 Energy Transition Law, by strengthening and specifying the transparency obligations in terms of sustainability. As a result, AXA IM Select France publishes an Article 29 report for the AXA IM Select France entity and for all funds and mandates with assets under management, at the balance sheet date, of more than €500 million.

The reports are available here: [AXA IM Select France | Responsible investment](#)

8. Annex A: Documents

Related documents	Link
AXA IM Responsible Investment Policy	Our Sustainability policies, methodologies & reports AXA IM Corporate
AXA Group Responsible Investment Policy	Investments AXA
AXA IM Select SFDR Legal Disclosures (Ireland)	Irish Domiciled Funds AXA IM
AXA IM Select SFDR Legal Disclosures (France)	AXA IM Select France Investissement responsable
Reporting Article 29 of the Energy- Climate Law of AXA IM Select France	AXA IM Select France Responsible investment
AXA IM Select France's Voting and Shareholder Engagement Policy	Legal & Regulatory Information AXA IM
AXA IM Select France's voting rights exercise report	Legal & Regulatory Information AXA IM
AXA IM Select France's Conflict of Interests Management Policy	Legal & Regulatory Information AXA IM
Conflict of interests policy	Internal document
AXA IM Select Investment Process Manuals	Internal documents

9. Annex B: Glossary

You can find it [here](#).