



SUSTAINABLE ENGAGEMENT POLICY

Mise à jour le 16 février 2021 par Félicien Nguyen
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Since its creation in 2007, INOCAP Gestion has had a committed approach to its activities. Intervening as closely as possible with entrepreneurs in the real economy, the company is very attentive to the challenges faced by innovative companies. ESG policies (social, environmental and governance) are among them. Today, they are a major concern for players in an ambitious, forward-looking economy.

Since 2018, our commitments and our approach have been further translated with the signing of the **United Nations Principles for Responsible Investment (UN PRI)**, which concerns all investments, and also continue to be carried through the internal **social responsibility policy and the sustainable engagement policy**, which integrate these ESG dimensions.

Convinced that sustainable investment contributes to the creation of extra-financial value for our investors, we seek to move from a logic of exclusion to one of commitment. Thus, we do not want to limit ourselves to excluding sectors or companies from our portfolios, but rather to enter into a **constructive dialogue** with the companies we work with.

In the exercise of our ESG policy, we seek materiality and/or intentionality. Our commitment will therefore be adapted according to the positioning of our investments, but also to the context and maturity of each invested company on ESG issues.

INOCAP Gestion's commitment consists in the following actions:

1. Consider ESG issues in our investment decision-making processes (see 4x3 of the ESG policy), via our integration policy,
2. Consider ESG issues in our shareholder policies and practices, including through a shareholder engagement policy that is consistent with our ESG objectives,
3. Participate in the life of the companies in which we are invested through voting at general meetings,
4. Do not invest in companies that are excluded by our investment policy (controversial weapons and tobacco) with the application of the 5% turnover threshold. Furthermore, INOCAP Gestion undertakes to exclude any company deriving a share of its turnover in the coal sector from the first euro. These exclusion thresholds are taken into account individually for each of the 3 exclusion areas (Tobacco, controversial weapons and coal) and are therefore not cumulative,
5. Require companies in which we invest to publish reports on their ESG practices,
6. Promote acceptance and application of the PRI among other asset managers,
7. Work in partnership with financial sector actors who have committed to the PRI to improve their effectiveness,
8. Report on our activities and progress in implementing the PRI,
9. In the event of controversy, encourage the company to explain the corrective measures (commitments and materiality targeted) and in the event of non-improvement, record this in our rating and/or exclude the companies,
10. Integrate an ESG approach into our internal policy in order to implement what we require of the companies in which we invest,
11. Have our results independently assessed, whether on our internal policy or on our investments.

Scope:

The QUADRIGE France Smallcaps, QUADRIGE RENDEMENT France Midcaps, QUADRIGE EUROPE Midcaps and QUADRIGE MULTICAPS Europe funds of the QUADRIGE range are concerned by these commitments. INOCAP Gestion's internal company policy is also concerned. All companies, sectors and geographical areas are concerned.

For more information, please refer to the Transparency Code detailing the rating principles.