BANQUE TRANSATLANTIQUE LUXEMBOURG

2022 Annual report on the implementation of commitment and voting policy

Banque Transatlantique Luxembourg (BTL) complied with the exclusion lists set up by Crédit Mutuel Alliance Fédérale and therefore, avoided investing in all stocks mentioned on this list.

In March 2022, BTL also decided to sell its stake in TotalEnergies in accordance with the Group's new commitments regarding the financing of fossil fuels, even though TotalEnergies is not included in the exclusion list.

With regard to research and access to information from financial and ESG data providers, BTL has signed research access contracts with renowned companies such as Bloomberg, BNP Paribas Exane, Kepler Chevreux, Oddo, Stifel, Raymond James and CM CIC.

In 2022, the Bank has set up an ESG monitoring tool for all stocks in the Advisory and Discretionary Management portfolios. The asset managers are now able to monitor ESG ratings and measure the sustainability impact of each company in the various portfolios. To do this, major developments have been made in the Portfolio Management System (PMS) and a contract for access to ESG data has been signed with MSCI in order to feed our PMS. In addition, portfolio managers participated in daily meetings with the Group's analysts to analyze companies from a financial and extra-financial point of view.

With regard to voting rights, BTL did not exercise these rights during the year and still does not use an external service provider to exercise voting rights. BTL did not have to cooperate with other shareholders in order to protect the interests of shareholders.

Finally, BTL continued to apply its policies on prevention, detection and management of conflicts of interest. In addition, employees signed the code of ethics and undertook to comply with the various internal policies set up by the group.