

Website Product Disclosures further to art. 10(1) of the Sustainable Finance Disclosure Regulation for art. 9 financial products

Name:

Amundi Euro Government Green Bond

Legal entity identifier:

549300JJ88530HIOFM17

No significant harm to the sustainable investment objective

The investment objective of the Sub-Fund is to replicate the Solactive Euro Government Green Bond Index (the “Index”) which has the sustainable investment objective of being representative of the performance of investment grade rated Green Bonds issued by European Monetary Union countries. Green Bonds are issued in order to fund projects that have positive environmental outcomes.

To ensure sustainable investments do no significant harm (“DNSH”), the index methodology excludes countries designated as “Not Free” by Freedom House. In addition, the fund will not invest in securities issued by sovereign issuers included in the European Union (EU) sanction list with a sanction consisting of asset freezing, and a sanction index at the highest level (considering both United States and EU sanctions), after formal review and validation from Amundi's Rating Committee.

The eligible green bonds as selected under the product taxonomy cannot finance projects or assets from the following activities:

Energy :

- Uranium mining for nuclear power;
- Any fossil fuel-based power generation including gas, “clean” coal and other coal.

Energy efficiency:

- Efficiency upgrades to GHG intensive power sources – e.g. cleaner coal technology;
- Energy savings in fossil fuel extraction activities - emission reduction requirements require a rapid phase out of all fossil fuel usage. Anything that helps to extend the life of fossil fuel usage is excluded.

Waste:

- Landfill without gas capture;
- Waste incineration without energy capture.

Transport:

- Rail lines where fossil fuels account for more than >50% of freight.

The principal adverse impact 16 “Investee countries subject to social violations” is taken into account through the exclusion from the sub-fund of countries on the European Union (EU) sanction list with a sanction consisting of asset freezing, and a sanction index at the highest level (considering both United States and EU sanctions), after formal review and validation from Amundi’s Rating Committee.

The sustainable investments considered are restricted to sovereign issuers. The OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights are not applicable for sovereigns.

Sustainable investment objective of the financial product

The sub-fund is passively managed. Its investment objective is to replicate the Solactive Euro Government Green Bond Index (the "Index") which has the sustainable investment objective of being representative of the performance of investment grade rated Green Bonds issued by European Monetary Union countries. Green Bonds are issued in order to fund projects that have positive environmental outcomes.

More precisely, to be eligible for inclusion in the Index, a bond must be considered as a "Green Bond" by the Climate Bonds Initiative. Climate Bonds Initiative is an investor-focused not-for-profit organization promoting large-scale investments that will deliver a global low carbon and climate resilient economy (more information is available on the website: <http://www.climatebonds.net/>). Climate Bonds Initiative has developed and implemented the following set of criteria to define Green Bonds which are eligible for the Index:

- i) Environmentally themed (self-labelled) bonds: to be eligible, green bonds must be publicly declared by their issuers as intended to be environmentally beneficial through labelling. Common eligible labels include, but are not limited to, 'green', 'climate-awareness', 'climate', 'environmental', 'carbon', 'sustainability' and 'ESG' (Environment, Social, and Governance). The issuer must use the label or description in a public document for the label to be valid (e.g., in a press release, in a statement, in the bond prospectus or supporting bond offering documents).
- ii) Eligible bond structures, which include:
 - Asset-linked structures or 'use of proceeds' bonds, whereby proceeds raised by bond sale are earmarked for eligible green projects; and
 - Asset-backed structures consisting in:
 - a) Project bonds, which are eligible if they are backed by a green project and the proceeds from bond sale are used solely to finance that same green project; and
 - b) Securitized bonds, which are eligible if proceeds go towards green projects or assets.
- iii) Use of proceeds: issuers must commit to use proceeds from the bond sale in full (net of any bond arrangement fees) to finance eligible green projects or assets. For instance, bonds where more than 5% of the proceeds are used for 'general corporate purposes' or projects that are not defined as green, or bonds where proceeds are to be split across different projects (e.g., an ESG Bond with social projects and separate green projects) are not eligible for inclusion in the Index.
- iv) Adherence with the "Climate Bonds Taxonomy": proceeds of an eligible green bond must be used to finance eligible green assets or projects which are typically related to one of the following sectors (as described in the Climate Bonds Taxonomy):
 - Renewable and Alternative Energy;
 - Energy efficiency;
 - Low-Carbon Transport;
 - Sustainable Water;
 - Waste, recycling and pollution;
 - Sustainable agriculture and forestry;
 - Climate resilient infrastructure and climate adaptation.

As further described in the Climate Bonds Taxonomy, areas of the above sectors can be excluded (e.g. energy savings in fossil fuel extraction activities - for the energy efficiency category -, or the landfill without gas capture - for the waste category -) and related bonds are ineligible for inclusion in the Index.

More information can be found on the website: <http://www.climatebonds.net/> and <https://www.climatebonds.net/standard/taxonomy>.

Investment strategy

The investment objective of the Sub-Fund is to reflect the performance of the “Solactive Euro Government Green Bond Index” (the “Index”), while minimising the volatility of the difference between the return of the Sub-Fund and the return of the Benchmark Index (the “Tracking Error”). The Index is representative of the performance of investment grade rated Green Bonds issued by European countries and denominated in EUR. Green Bonds are issued in order to fund projects that have positive environmental outcomes.

This is a passively managed ETF. Its investment strategy is to replicate the Index while minimizing the related tracking error.

To be eligible for inclusion in the Index, a bond must be considered as a “Green Bond” by the Climate Bonds Initiative. Climate Bonds Initiative is an investor-focused not-for-profit organization promoting large-scale investments that will deliver a global low carbon and climate resilient economy (more information is available on the website: <http://www.climatebonds.net/>). Climate Bonds Initiative has developed and implemented the following set of criteria to define Green Bonds which are eligible for the Index:

- i) Environmentally themed (self-labelled) bonds: to be eligible, green bonds must be publicly declared by their issuers as intended to be environmentally beneficial through labelling. Common eligible labels include, but are not limited to, ‘green’, ‘climate-awareness’, ‘climate’, ‘environmental’, ‘carbon’, ‘sustainability’ and ‘ESG’ (Environment, Social, and Governance). The issuer must use the label or description in a public document for the label to be valid (e.g., in a press release, in a statement, in the bond prospectus or supporting bond offering documents).
- ii) Eligible bond structures, which include:
 - Asset-linked structures or ‘use of proceeds’ bonds, whereby proceeds raised by bond sale are earmarked for eligible green projects; and
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 - a) Project bonds, which are eligible if they are backed by a green project and the proceeds from bond sale are used solely to finance that same green project; and
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- iv) Adherence with the “Climate Bonds Taxonomy”: proceeds of an eligible green bond must be used to finance eligible green assets or projects which are typically related to one of the following sectors (as described in the Climate Bonds Taxonomy):
 - i. Renewable and Alternative Energy;
 - ii. Energy efficiency;
 - iii. Low-Carbon Transport;
 - iv. Sustainable Water;
 - v. Waste, recycling and pollution;
 - vi. Sustainable agriculture and forestry;
 - vii. Climate resilient infrastructure and climate adaptation.

As further described in the Climate Bonds Taxonomy, areas of the above sectors can be excluded (e.g. energy savings in fossil fuel extraction activities - for the energy efficiency category -, or the landfill without gas capture - for the waste category -) and related bonds are ineligible for inclusion in the Index.

More information can be found on the website: <http://www.climatebonds.net/> and <https://www.climatebonds.net/standard/taxonomy>.

The Product strategy is also relying on systematic exclusions policies (normative and sectorial) as further described in Amundi Responsible Investment policy.

Proportion of investments

The sub-fund commits to invest permanently at least 90% the net asset value of the Sub-Fund in Green Bonds comprising the Index (ie an EMU Government Green Bond).

The Sub-Fund commits to have a minimum of 90% of sustainable investments. The Sustainable investment of the Sub Fund are supporting Environmental objective.

The planned proportion of other Environmental investment may change as the actual proportions of Taxonomy-aligned investments increase.

Monitoring of sustainable investment objective

Sustainability indicator used to measure the attainment of the sustainable investment objective of this financial product is the percentage of bonds considered as “Green Bond” by the climate bond initiative in the Index composition

Methodologies

The initial composition of the Index, as well as any selection for a rebalance is determined using the following rules:

- The constituents of the Index must be constituents of the Solactive Green Bond EUR USD IG Index
- Denominated in EUR
- Amount Outstanding of at least EUR 300 million
- Only Central Government debt issued by a single members of the Eurozone
- Floating rate notes, bills, inflation linked bonds, convertible bonds, US municipal bonds, ABS/MBS and other structured securities are excluded
- A price from the pricing provider must be available for each each bond reflected in the Index on each SELECTION DAY

In the event less than 6 bonds fulfil the above criteria (the “Standard Criteria”), the constraints will be relaxed as follows to enlarge the universe of eligible bonds and to get 6 constituents for the Index:

o Bonds previously in the Index can remain in the selection even if their time to maturity fell below 1 year but is longer than one month on the rebalancing day (“Outlasting Bonds”).

o If the residual time to maturity of Outlasting Bonds falls below one month, the investment universe is further broadened to include Green Bonds issued in EUR by countries of the European Union which meet all other Standard Criteria (the “Non-Eurozone Bonds”). The Outlasting Bonds will be replaced by:

- the Non-Eurozone Bond with the lowest time-to-maturity.
- If several Non-Eurozone Bonds have the same (lowest) time-to-maturity, by the one with the lowest amount outstanding.

If new issues comply with all Standard Criteria; they will replace the Outlasting Bonds and/or the Non-Eurozone Bonds following the below criteria: o Priority is given to replace those bonds with the lowest time-to-maturity. o If there are several Bonds with the same (lowest) time-to-maturity, it will replace the Bond with the largest amount outstanding.

If new issues comply with all Standard Criteria; they will replace the Outlasting Bonds and/or the Non-Eurozone Bonds following the below criteria:

o Priority is given to replace those bonds with the lowest time-to-maturity.

o If there are several Bonds with the same (lowest) time-to-maturity, it will replace the Bond with the largest amount outstanding

Where :

SELECTION DAY is 5 BUSINESS DAYS before the scheduled REBALANCE DAY, disregarding any potential change of the REBALANCE DAY

“REBALANCE DAY” is the last BUSINESS DAY of the month

Additional information on the Index can be found at

https://www.solactive.com/downloads/Guideline_Solactive_Euro_Government_Green_Bond_Index.pdf

Data sources and processing

- a) Description of data sources used to provide information on the disclosed ESG factors

The respective source of each disclosed ESG factor is described in the Solactive ESG Factor disclosure Guideline available at www.solactive.com/documents

- b) Reference standards

If individual data points reported under the description of the ESG factors above are informed by supporting standards, the latter are listed in the detailed definition of the respective item in the Solactive ESG Disclosure Guideline available at www.solactive.com/documents Limitations to methodologies and data

The Index provider methodology limitations are by construction linked to use of ESG data. The ESG data landscape is currently being standardized, which can impact data quality; data coverage also is a limitation. Current and future regulation will improve standardized.

The Index provider is aware of these limitations which the Index provider is mitigate by a combination of approaches: the monitoring of controversies, the use of several data providers, a structured qualitative assessment by our ESG research team of the ESG scores, the implementation of a strong governance.

Due diligence

Amundi carries out due diligence on the index providers and engages with them on an ongoing basis with regard to index methodologies including their assessment of good governance criteria (if applicable).

Engagement policies

Amundi engages at the issuer level regardless of the type of holdings held (equity and bonds). Issuers engaged are primarily chosen by the level of exposure to the subject of engagement, as the environmental, social, and governance issues that companies face have a major impact on society, both in terms of risk and opportunities.

Attainment of the sustainable investment objective

Yes, the Index has been designated as a reference benchmark to determine whether the Sub-Fund is aligned with its sustainable investment objective.

According to applicable regulations to index provider (including BMR), index provider should define appropriate controls/diligence when defining and/or operating index methodologies of regulated indexes.

The Index is representative of the performance of investment grade rated Green Bonds issued by European countries and denominated in EUR. Green Bonds are issued in order to fund projects that have positive environmental outcomes

Additional information on the Index can be found at www.solactive.com

The proportion of sustainable investment in the product portfolio is monitored on an ongoing basis in Amundi proprietary portfolio management system, with first level controls on the achievement of the minimum committed level carried out by the investment team, and second level controls carried out by the Risk function. The proportion of Sustainable Investments in the portfolio is calculated on an ongoing basis applying to each security in the product portfolio the filters described in section “Monitoring of sustainable investment objective” above.