




Type of engagement	Reason for interaction	Priority: PRI 1,2,3
Individual/ internal staff engagements	<input checked="" type="checkbox"/> To support investment decisionmaking in a company's material ESG issues <input checked="" type="checkbox"/> To influence corporate transition or identify the need for additional or enhanced information <input checked="" type="checkbox"/> To engage investor ESG advisors <input type="checkbox"/> Other: specify _____ <input type="checkbox"/> We do not engage: do internal staff	
Collaborative engagements	<input type="checkbox"/> To support investment decisionmaking in a company's material ESG issues <input type="checkbox"/> To influence corporate transition or identify the need for additional or enhanced information <input type="checkbox"/> Other: specify _____ <input type="checkbox"/> We do not engage: do collaborative engagements	
Service provider engagements	<input type="checkbox"/> To support investment decisionmaking in a company's material ESG issues <input type="checkbox"/> To influence corporate transition or identify the need for additional or enhanced information <input type="checkbox"/> Other: specify _____ <input type="checkbox"/> We do not engage: do service providers	

# RI TRANSPARENCY REPORT

## 2020

### EUROBANK ASSET MANAGEMENT MFMC

## About this report

The PRI Reporting Framework is a key step in the journey towards building a common language and industry standard for reporting responsible investment (RI) activities. This RI Transparency Report is one of the key outputs of this Framework. Its primary objective is to enable signatory transparency on RI activities and facilitate dialogue between investors and their clients, beneficiaries and other stakeholders. A copy of this report will be publicly disclosed for all reporting signatories on the [PRI website](#), ensuring accountability of the PRI Initiative and its signatories.

This report is an export of the individual Signatory organisation's response to the PRI during the 2020 reporting cycle. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information. As a result, the reports can be extensive. However, to help easily locate information, there is a **Principles index** which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

## Understanding the Principles Index

The Principles Index summarises the response status for the individual indicators and modules and shows how these relate to the six [Principles for Responsible Investment](#). It can be used by stakeholders as an 'at-a-glance' summary of reported information and to identify particular themes or areas of interest.

Indicators can refer to one or more Principles. Some indicators are not specific to any Principle. These are highlighted in the 'General' column. When multiple Principles are covered across numerous indicators, in order to avoid repetition, only the main Principle covered is highlighted.

All indicators within a module are presented below. The status of indicators is shown with the following symbols:

Symbol	Status
✓	The signatory has completed all mandatory parts of this indicator
☑	The signatory has completed some parts of this indicator
🔒	This indicator was not relevant for this signatory
-	The signatory did not complete any part of this indicator
Ⓜ	The signatory has flagged this indicator for internal review

Within the table, indicators marked in blue are mandatory to complete. Indicators marked in grey are voluntary to complete.

# Principles Index

Organisational Overview				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
OO TG		🔒	n/a							
OO 01	Signatory category and services	✓	Public							✓
OO 02	Headquarters and operational countries	✓	Public							✓
OO 03	Subsidiaries that are separate PRI signatories	✓	Public							✓
OO 04	Reporting year and AUM	✓	Public							✓
OO 05	Breakdown of AUM by asset class	✓	Asset mix disclosed in OO 06							✓
OO 06	How would you like to disclose your asset class mix	✓	Public							✓
OO 07	Fixed income AUM breakdown	✓	Private							✓
OO 08	Segregated mandates or pooled funds	✓	Private							✓
OO 09	Breakdown of AUM by market	✓	Public							✓
OO 10	Active ownership practices for listed assets	✓	Public							✓
OO 11	ESG incorporation practices for all assets	✓	Public							✓
OO 12	Modules and sections required to complete	✓	Public							✓
OO LE 01	Breakdown of listed equity investments by passive and active strategies	✓	Private							✓
OO LE 02	Reporting on strategies that are <10% of actively managed listed equities	✓	Private							✓
OO FI 01	Breakdown of fixed income investments by passive and active strategies	✓	Private							✓
OO FI 02	Reporting on strategies that are <10% of actively managed fixed income	🔒	n/a							✓
OO FI 03	Fixed income breakdown by market and credit quality	✓	Public							✓
OO SAM 01	Breakdown of externally managed investments by passive and active strategies	✓	Private							✓
OO PE 01	Breakdown of private equity investments by strategy	🔒	n/a							✓
OO PE 02	Typical level of ownership in private equity investments	🔒	n/a							✓
OO PR 01	Breakdown of property investments	🔒	n/a							✓
OO PR 02	Breakdown of property assets by management	🔒	n/a							✓
OO PR 03	Largest property types	🔒	n/a							✓
OO INF 01	Breakdown of infrastructure investments	🔒	n/a							✓
OO INF 02	Breakdown of infrastructure assets by management	🔒	n/a							✓
OO INF 03	Largest infrastructure sectors	🔒	n/a							✓
OO HF 01	Breakdown of hedge funds investments by strategies	🔒	n/a							✓
OO End	Module confirmation page	✓	-							

CCStrategy and Governance				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
SG 01	RI policy and coverage	✓	Public							✓
SG 01 CC	Climate risk	✓	Private							✓
SG 02	Publicly available RI policy or guidance documents	✓	Public						✓	
SG 03	Conflicts of interest	✓	Public							✓
SG 04	Identifying incidents occurring within portfolios	✓	Private							✓
SG 05	RI goals and objectives	✓	Public							✓
SG 06	Main goals/objectives this year	✓	Private							✓
SG 07	RI roles and responsibilities	✓	Public							✓
SG 07 CC	Climate-issues roles and responsibilities	✓	Private							✓
SG 08	RI in performance management, reward and/or personal development	✓	Private							✓
SG 09	Collaborative organisations / initiatives	✓	Public				✓	✓		
SG 09.2	Assets managed by PRI signatories	✓	Private	✓						
SG 10	Promoting RI independently	✓	Public				✓			
SG 11	Dialogue with public policy makers or standard setters	✓	Private				✓	✓	✓	
SG 12	Role of investment consultants/fiduciary managers	✓	Public				✓			
SG 13	ESG issues in strategic asset allocation	✓	Public	✓						
SG 13 CC		🔒	n/a							✓
SG 14	Long term investment risks and opportunity	✓	Private	✓						
SG 14 CC		✓	Private							✓
SG 15	Allocation of assets to environmental and social themed areas	✓	Private	✓						
SG 16	ESG issues for internally managed assets not reported in framework	🔒	n/a							✓
SG 17	ESG issues for externally managed assets not reported in framework	✓	Public							✓
SG 18	Innovative features of approach to RI	✓	Private							✓
SG 19	Communication	✓	Public		✓				✓	
SG End	Module confirmation page	✓	-							

Direct - Listed Equity Incorporation				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
LEI 01	Percentage of each incorporation strategy	✓	Public	✓						
LEI 02	Type of ESG information used in investment decision	✓	Private	✓						
LEI 03	Information from engagement and/or voting used in investment decision-making	✓	Private	✓						
LEI 04	Types of screening applied	✓	Public	✓						
LEI 05	Processes to ensure screening is based on robust analysis	✓	Public	✓						
LEI 06	Processes to ensure fund criteria are not breached	✓	Private	✓						
LEI 07	Types of sustainability thematic funds/mandates	✓	Public	✓						
LEI 08	Review ESG issues while researching companies/sectors	🔒	n/a	✓						
LEI 09	Processes to ensure integration is based on robust analysis	🔒	n/a	✓						
LEI 10	Aspects of analysis ESG information is integrated into	🔒	n/a	✓						
LEI 11	ESG issues in index construction	🔒	n/a	✓						
LEI 12	How ESG incorporation has influenced portfolio composition	-	n/a	✓						
LEI 13	Examples of ESG issues that affected your investment view / performance	-	n/a	✓						
LEI End	Module confirmation page	✓	-							

Direct - Listed Equity Active Ownership				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
LEA 01	Description of approach to engagement	✓	Public		✓					
LEA 02	Reasoning for interaction on ESG issues	✓	Public	✓	✓	✓				
LEA 03	Process for identifying and prioritising engagement activities	✓	Public		✓					
LEA 04	Objectives for engagement activities	✓	Public		✓					
LEA 05	Process for identifying and prioritising collaborative engagement	✓	Public		✓					
LEA 06	Role in engagement process	✓	Public		✓		✓			
LEA 07	Share insights from engagements with internal/external managers	✓	Private	✓	✓					
LEA 08	Tracking number of engagements	✓	Public		✓					
LEA 09	Number of companies engaged with, intensity of engagement and effort	🔒	n/a		✓					
LEA 10	Engagement methods	✓	Private		✓					
LEA 11	Examples of ESG engagements	-	n/a		✓					
LEA 12	Typical approach to (proxy) voting decisions	🔒	n/a		✓					
LEA 13	Percentage of voting recommendations reviewed	🔒	n/a		✓					
LEA 14	Securities lending programme	🔒	n/a		✓					
LEA 15	Informing companies of the rationale of abstaining/voting against management	🔒	n/a		✓					
LEA 16	Informing companies of the rationale of abstaining/voting against management	🔒	n/a		✓					
LEA 17	Percentage of (proxy) votes cast	🔒	n/a		✓					
LEA 18	Proportion of ballot items that were for/against/abstentions	🔒	n/a		✓					
LEA 19	Proportion of ballot items that were for/against/abstentions	🔒	n/a		✓					
LEA 20	Shareholder resolutions	🔒	n/a		✓					
LEA 21	Examples of (proxy) voting activities	🔒	n/a		✓					
LEA End	Module confirmation page	✓	-							

Direct - Fixed Income				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
FI 01	Incorporation strategies applied	✓	Public	✓						
FI 02	ESG issues and issuer research	✓	Private	✓						
FI 03	Processes to ensure analysis is robust	✓	Public	✓						
FI 04	Types of screening applied	✓	Public	✓						
FI 05	Examples of ESG factors in screening process	✓	Private	✓						
FI 06	Screening - ensuring criteria are met	✓	Public	✓						
FI 07	Thematic investing - overview	✓	Private	✓						
FI 08	Thematic investing - themed bond processes	✓	Public	✓						
FI 09	Thematic investing - assessing impact	✓	Public	✓						
FI 10	Integration overview	🔒	n/a	✓						
FI 11	Integration - ESG information in investment processes	🔒	n/a	✓						
FI 12	Integration - E,S and G issues reviewed	🔒	n/a	✓						
FI 13	ESG incorporation in passive funds	-	n/a	✓						
FI 14	Engagement overview and coverage	✓	Private		✓					
FI 15	Engagement method	✓	Private	✓	✓					
FI 16	Engagement policy disclosure	✓	Private	✓	✓					
FI 17	Financial/ESG performance	✓	Private							✓
FI 18	Examples - ESG incorporation or engagement	-	n/a	✓	✓					
FI End	Module confirmation page	✓	-							

Confidence building measures				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
CM1 01	Assurance, verification, or review	✓	Public							✓
CM1 02	Assurance of last year`s PRI data	✓	Public							✓
CM1 03	Other confidence building measures	✓	Public							✓
CM1 04	Assurance of this year`s PRI data	✓	Public							✓
CM1 05	External assurance	🔒	n/a							✓
CM1 06	Assurance or internal audit	🔒	n/a							✓
CM1 07	Internal verification	🔒	n/a							✓
CM1 01 End	Module confirmation page	✓	-							



# EUROBANK ASSET MANAGEMENT MFMC

## Reported Information

## Public version

## Organisational Overview

## PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

## Basic information

OO 01

Mandatory

Public

Gateway/Peering

General

OO 01.1

Select the services and funds you offer

Select the services and funds you offer	% of asset under management (AUM) in ranges
Fund management	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50%
Fund of funds, manager of managers, sub-advised products	<input type="radio"/> 0% <input type="radio"/> <10% <input checked="" type="radio"/> 10-50% <input type="radio"/> >50%
Other	<input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Total 100%	

Further options (may be selected in addition to the above)

- Hedge funds
- Fund of hedge funds

OO 01.2

Additional information. [Optional]

The fund management section includes both UCITs Mutual Funds and segregated mandates that have been assigned to the Company for asset management through an RFP process.

The Fund of Funds section includes both UCITs Fund of Funds and segregated mandates that have been assigned to the Company for asset management through an RFP Process and in which the portfolio management has been mandated to be done with the use of active and passive funds and ETFs. It also includes the Discretionary Asset Management mandates of high net worth clients of the Private Banking units of Eurobank, Eurobank Private Bank Luxembourg and Eurobank Cyprus, the portfolio management of which has been outsourced to Eurobank Asset Management MFMC. Such portfolios invest solely in institutional share classes of UCITS funds, in ETFs and in cash.

OO 02

Mandatory

Public

Peering

General

**OO 02.1** Select the location of your organisation's headquarters.

Greece

**OO 02.2** Indicate the number of countries in which you have offices (including your headquarters).

- 1
- 2-5
- 6-10
- >10

**OO 02.3** Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).

FTE

51

**OO 02.4** Additional information. [Optional]

Eurobank Asset Management MFMC is a wholly owned subsidiary of Eurobank Ergasias, one of the four systemic banks operating in Greece. The Group's presence outside of Greece includes Luxembourg, Cyprus, Bulgaria, Serbia and London. In its role as asset and fund manager, Eurobank Asset Management MFMC has been assigned with the investment and risk management of UCITS mutual funds that are being domiciled and launched in Luxembourg out of Eurobank Fund Management Company (LUX) SA, which is also a wholly owned subsidiary of the Group, incorporated in 2006. In this context, we would also like to report that Eurobank Fund Management Company (LUX) SA had 3 FTEs as of the end of December 2019.

<b>OO 03</b>	<b>Mandatory</b>	<b>Public</b>	<b>Descriptive</b>	<b>General</b>
--------------	------------------	---------------	--------------------	----------------

**OO 03.1** Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.

- Yes
- No

**OO 03.3** Additional information. [Optional]

We should note at this point that Eurobank Ergasias SA, which owns by 100% Eurobank Asset Management MFMC, has been a member of the UN Global Compact since 2008 and is also a member of UNEP-FI, a signatory of the Principles for Responsible Banking and produces a corporate sustainability report annually according to the GRI Standards, where also Eurobank Asset Management MFMC corporate responsibility actions are referred.

<b>OO 04</b>	<b>Mandatory</b>	<b>Public</b>	<b>Gateway/Peering</b>	<b>General</b>
--------------	------------------	---------------	------------------------	----------------

**OO 04.1** Indicate the year end date for your reporting year.

31/12/2019

**OO 04.2**

Indicate your total AUM at the end of your reporting year.

Include the AUM of subsidiaries, but exclude advisory/execution only assets, and exclude the assets of your PRI signatory subsidiaries that you have chosen not to report on in OO 03.2

	trillions	billions	millions	thousands	hundreds
Total AUM		3	172	000	000
Currency	EUR				
Assets in USD		3	496	499	715

Not applicable as we are in the fund-raising process

**OO 04.4**

Indicate the assets which are subject to an execution and/or advisory approach. Provide this figure based on the end of your reporting year

	trillions	billions	millions	thousands	hundreds
Total AUM			780	000	000
Currency	EUR				
Assets in USD			859	795	012

Not applicable as we do not have any assets under execution and/or advisory approach

**OO 04.5** | Additional information. [Optional]

The figures under advisory above concern: (i) advisory mandates with the Company's institutional investors and with high net worth individuals outsourced to our Company by the Bank's Private Banking, and (ii) services we provide to the Private Banking units of our organization in Greece, Luxembourg and Cyprus for the selection of third party funds whereby thematic funds are a distinct category.

**OO 06** | **Mandatory** | **Public** | **Descriptive** | **General**

**OO 06.1** | Select how you would like to disclose your asset class mix.

as percentage breakdown

	Internally managed (%)	Externally managed (%)
Listed equity	11	13
Fixed income	41	12
Private equity	0	0
Property	0	0
Infrastructure	0	0
Commodities	0	1
Hedge funds	0	0
Fund of hedge funds	0	0
Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	6	0

Money market instruments	12	4
Other (1), specify	0	0
Other (2), specify	0	0

as broad ranges

**OO 06.2** Publish asset class mix as per attached image [Optional].

**OO 06.3** Indicate whether your organisation has any off-balance sheet assets [Optional].

- Yes
- No

**OO 06.5** Indicate whether your organisation uses fiduciary managers.

- Yes, we use a fiduciary manager and our response to OO 5.1 is reflective of their management of our assets.
- No, we do not use fiduciary managers.

**OO 06.6** Provide contextual information on your AUM asset class split. [Optional]

The above breakdown consists of the following: (1) institutional asset management mandates based on security selection and broken up in asset classes as internally managed, (2) institutional asset management mandates using third party funds and ETFs and broken up in asset classes as externally managed with the cash component considered as internally managed, (3) Fund of Funds using both third party and own funds in their portfolio, whereby the third party funds have been broken up by asset class as externally managed and the own funds part of the fund of funds is broken up by asset class as internally managed and the cash and money market component considered as internally managed and (4) mutual funds based on security selection and broken up in asset classes as internally managed.

**OO 09** **Mandatory** **Public** **Peering** **General**

**OO 09.1** Indicate the breakdown of your organisation's AUM by market.

Developed Markets

49

Emerging Markets

51

Frontier Markets

0

	Other Markets
--	---------------

0

	Total 100%
--	------------

100%

<b>OO 09.2</b>	Additional information. [Optional]
----------------	------------------------------------

Over half of our company's AUM are invested in the Fixed Income market with a high concentration in Greek Government Bonds and Greek Corporate Bonds. In this context and as MSCI classifies Greece in the Emerging Markets space, we have added in the EM percentage all our holdings of Greek Government Bonds, Greek Corporate Bonds, Greek equities, TD&MM equivalents held in Greece and cash. Furthermore, we have also added our externally managed assets in EM equities and EM bonds plus our internally managed assets in Emerging Europe.

### Asset class implementation gateway indicators

<b>OO 10</b>	<b>Mandatory</b>	<b>Public</b>	<b>Gateway</b>	<b>General</b>
--------------	------------------	---------------	----------------	----------------

<b>OO 10.1</b>	Select the active ownership activities your organisation implemented in the reporting year.
----------------	---

	Listed equity – engagement
--	----------------------------

- We engage with companies on ESG factors via our staff, collaborations or service providers.
- We require our external managers to engage with companies on ESG factors on our behalf.
- We do not engage directly and do not require external managers to engage with companies on ESG factors.

	Listed equity – voting
--	------------------------

- We cast our (proxy) votes directly or via dedicated voting providers
- We require our external managers to vote on our behalf.
- We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf

<b>OO 10.3</b>	Indicate why you do not cast your votes
----------------	---

Indicate why you do not cast your votes

The allocation of our total AUM to listed equities amounts to 24% or to approximately EUR 755 million. Of this amount, EUR 252 million are invested in the EM space, with approximately EUR 210 million invested directly and not through external managers. Approximately 90% of this amount is directly invested in equities listed in the Athens Exchange. As our size in the global equity space is extremely limited, it would be impossible to cast votes for direct holdings we may have in the developed market space.

However, our Company is the biggest asset and fund management company in Greece by means of AUM. In this respect, and within our broader initiative of engaging responsibly and sustainably both on our corporate activities and our investment activities, and in order to become an active steward as per the principles of responsible investing we have to adhere to owing to our PRI membership, we decided to pursue this goal by submitting our application to become a member of the Council for Sustainable Growth of the Hellenic Federation of Industries (SEV), the local charter of the World Business Council

for Sustainable Development. We boast to be the first asset and fund management company in Greece to take this initiative, which was welcomed by the Board of Directors of the said Council that approved our application. With this honourable membership - which was endorsed at the end of 2019 - and our PRI membership, we will embark in engaging directly with the member companies of SEV which are also listed in the Athens Exchange. We hope to be able to cast our votes in General Assemblies of such companies within 2021.

In the space of developed markets equities in which we heavily resort to external managers through their pooled funds, we tend to select ESG compliant equity funds for the following mandates: (1) segregated mandates of Occupational Pension Funds that are obliged to incorporate ESG criteria into their investment decision process and in their investment portfolios according to the IORP II Directive which has been transposed into national law, and (2) the (LF) FOF ESG Focus fund, which is a Fund of Fund explicitly incorporating ESG criteria in its fund selection process.

We do not cast our votes but provide substantive research and voting recommendations to our clients.

#### Fixed income SSA – engagement

- We engage with SSA bond issuers on ESG factors via our staff, collaborations or service providers.
- We require our external managers to engage with SSA bond issuers on ESG factors on our behalf.
- We do not engage directly and do not require external managers to engage with SSA bond issuers on ESG factors. Please explain why you do not.

Please explain why you do not engage directly and do not require external managers to engage with companies on ESG factors.

As already described in the previous section, the majority of our SSA holdings regard Greek Government Bonds. The Hellenic Republic, due to the 10 year long financial and sovereign crisis the country went through, is striving to get back to the markets and re-finance its already huge, as a percentage of GDP, public debt. In this respect, ESG factors cannot be readily applicable for the Greek sovereign space. Regarding the rest of our holdings in the SSA space, our AUM are limited in size and therefore we cannot engage directly with the issuers (supranational or national governments) on the implementation of ESG factors regarding their bond issuance. However, when we engage in direct bond selection of supranational issues, we tend to opt for such bonds that have been issued to be deployed for an ESG cause, such as the EIB CAB bonds. Furthermore, when we resort to external managers through their pooled funds for our SSA holdings, we tend to select funds that are ESG compliant by means of use of proceeds. We have also noticed that ESG Ratings for Countries have started being available and we will review their credibility, timeliness and applicability to our investment process under this asset class.

#### Fixed income Corporate (financial) – engagement

- We engage with companies on ESG factors via our staff, collaborations or service providers.
- We require our external managers to engage with companies on ESG factors on our behalf.
- We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.

Please explain why you do not engage directly and do not require external managers to engage with companies on ESG factors.

Our direct holdings in the Corporate Financial space are extremely limited, amounting to approximately EUR 158 mio. The majority of such holdings pertains to issues of Greek systemic banks which have been issuing mainly due to balance sheet issues rather than due to financing "green" projects due to the extraordinary percentages of NPLs in their portfolios. Up to the end of 2019, Greek Banks had an average NPL ratio of around 40%, so engaging with their management for incorporating ESG factors in their bond issuance would not have been constructive.

Regarding our indirect holdings of Corporate financial instruments through pooled funds of our external managers, our exposure is extremely limited, amounting to approximately EUR 30 million which does not allow us to explicitly require our external managers to engage with Banks and insurance companies on



ESG factors. In this context, we rely upon the ESG initiatives taken by our external managers without submitting explicit requests to them.

#### Fixed income Corporate (non-financial) – engagement

- We engage with companies on ESG factors via our staff, collaborations or service providers.
- We require our external managers to engage with companies on ESG factors on our behalf.
- We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.

OO 11	Mandatory	Public	Gateway	General
-------	-----------	--------	---------	---------

#### OO 11.1

Select the internally managed asset classes in which you addressed ESG incorporation into your investment decisions and/or your active ownership practices (during the reporting year).

##### Listed equity

- We address ESG incorporation.
- We do not do ESG incorporation.

##### Fixed income - SSA

- We address ESG incorporation.
- We do not do ESG incorporation.

##### Fixed income - corporate (financial)

- We address ESG incorporation.
- We do not do ESG incorporation.

##### Fixed income - corporate (non-financial)

- We address ESG incorporation.
- We do not do ESG incorporation.

##### Cash

- We address ESG incorporation.
- We do not do ESG incorporation.

##### Money market instruments

- We address ESG incorporation.
- We do not do ESG incorporation.

#### OO 11.2

Select the externally managed assets classes in which you and/or your investment consultants address ESG incorporation in your external manager selection, appointment and/or monitoring processes.

Asset class	ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes
Listed equity	<p data-bbox="571 342 1474 423">Listed equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="571 439 1294 465"><input type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p data-bbox="571 479 1374 535"><input checked="" type="checkbox"/> We invest only in pooled funds and external manager appointment is not applicable</p> <p data-bbox="571 551 1310 577"><input type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p data-bbox="571 591 948 618"><input type="checkbox"/> We do not do ESG incorporation</p>
Fixed income - SSA	<p data-bbox="571 683 1474 763">Fixed income - SSA - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="571 779 1294 806"><input type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p data-bbox="571 819 1374 875"><input checked="" type="checkbox"/> We invest only in pooled funds and external manager appointment is not applicable</p> <p data-bbox="571 891 1310 918"><input type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p data-bbox="571 931 948 958"><input type="checkbox"/> We do not do ESG incorporation</p>
Fixed income - corporate (financial)	<p data-bbox="571 1023 1474 1122">Fixed income - corporate (financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="571 1144 1294 1171"><input type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p data-bbox="571 1184 1374 1240"><input checked="" type="checkbox"/> We invest only in pooled funds and external manager appointment is not applicable</p> <p data-bbox="571 1256 1310 1283"><input type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p data-bbox="571 1296 948 1323"><input type="checkbox"/> We do not do ESG incorporation</p>
Fixed income - corporate (non-financial)	<p data-bbox="571 1391 1474 1489">Fixed income - corporate (non-financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="571 1512 1294 1538"><input type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p data-bbox="571 1552 1374 1608"><input checked="" type="checkbox"/> We invest only in pooled funds and external manager appointment is not applicable</p> <p data-bbox="571 1624 1310 1650"><input type="checkbox"/> We incorporate ESG into our external manager monitoring process</p> <p data-bbox="571 1664 948 1691"><input type="checkbox"/> We do not do ESG incorporation</p>
Commodities	<p data-bbox="571 1758 1474 1839">Commodities - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <p data-bbox="571 1854 1294 1881"><input type="checkbox"/> We incorporate ESG into our external manager selection process</p> <p data-bbox="571 1895 1374 1951"><input checked="" type="checkbox"/> We invest only in pooled funds and external manager appointment is not applicable</p> <p data-bbox="571 1966 1310 1993"><input type="checkbox"/> We incorporate ESG into our external manager monitoring process</p>

	<input type="checkbox"/> We do not do ESG incorporation
Money market instruments	<div style="background-color: #0070C0; color: white; padding: 5px; margin-bottom: 10px;"> Money market instruments - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes </div> <input type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We invest only in pooled funds and external manager appointment is not applicable <input type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation

**OO 11.4**

Provide a brief description of how your organisation includes responsible investment considerations in your investment manager selection, appointment and monitoring processes.

In this section we will provide you with a description of the fund selection processes that we follow for two distinct parts of our business: (1) fund selection incorporating ESG criteria for the management of portfolios of Occupational Pension Funds that have to observe the provision of the IORP II Directive regarding the incorporation of ESG criteria in the investment decision making process and the assessment of sustainability risks, and (2) fund selection incorporating ESG criteria for the management of Fund of Funds specifically set up for ESG incorporation.

(1) Fund Selection process for the management of portfolios of Occupational Pension Funds: We employ a process that identifies the funds that use a dedicated ESG compliant investment process. Thus, we invest in ESG compliant funds for the majority of our fund allocation. As part of our qualitative fund selection process, we regularly conduct one-to-one meetings and conference calls with the dedicated fund managers to get an in-depth analysis of their ESG investment process and make sure that they stick to this process. It is also noteworthy that we have organized dedicated meetings with some of our third party fund providers' ESG analysis teams that proceeded to deliver an extensive presentation of the ways they approach ESG incorporation with a special focus in the way they incorporate their own ESG criteria along with the weight that they apply to each of these criteria. Moreover, some of our providers also exhibited the questionnaire they use when analysing a company for ESG factors and showcased the way they onboard the respective answers to their systems in order to produce their in-house rankings that they then couple with rankings they get from other data providers. In this context, we are quite confident that the ESG compliant funds offered by our third party providers are indeed incorporating in a meticulous and pedantic way ESG factors. As a next step, we also do detailed look through into the ESG compliant funds that we choose in order to also enhance our investment idea generation process for individual stocks and bonds.

We also rely on the ESG ratings of the funds under selection that are issued by well trusted independent European and global organizations or government agencies. We assign an ESG score of 100 to these funds. The fund managers themselves also update a list with "ESG" integrated funds that do not have an independent third party ESG certification, but nonetheless have an investment process that is ESG focused and designed to systematically capture ESG risks and opportunities in the portfolios. We assign an ESG score of 66 (2/3) to such funds. We then update our third party funds database with all the relevant ESG funds in order to facilitate our sectorial ESG fund selection.

Our IOPF ESG investment process entails investing mainly in ESG certified funds and ESG compliant funds in order to make sure that the funds we invest in have a pure ESG strategy with a dedicated ESG investment process.

In addition to the above, we also use the following tools and systems to screen mutual funds in terms of their ESG compliance: (i) Mercer ESG rating that used to be available on Bloomberg and was applicable at the investment strategy level of each fund, (ii) Morningstar ESG ratios, and (iii) Eurobank AM Fund of Funds ESG process that will be described below.

(2) ESG Fund of Funds Selection and Investment Process: We start with a universe of UCITS available in Bloomberg, which comprises of approximately 1,500 funds. First, we exclude all funds with a Mercer ESG rating of 3 and above (Mercer ESG ratings range from ESG1 to ESG4 being the lowest). We then take the higher rated funds, ESG1 and ESG2 as well as all non-rated ones and create an Investment List in Morningstar Direct. We take the Morningstar Sustainability Score (which incorporates Sustainalytics ESG data) of the portfolios and we exclude funds that are ranked below the 40th percentile in the Sustainability Score percent-rank. It should be noted that Morningstar calculates the Portfolio Sustainability Score by combining a fund's Portfolio ESG Score with its Portfolio Controversy Score, by deducting one fifth of the Portfolio Controversy score from the Portfolio ESG one. The resulting score is displayed as a number between 0 and 100. From a sustainability standpoint, higher scores are better than lower ones and indicate that a fund has, on average, more of its assets invested in companies that score well under Sustainalytics' ESG methodology. The top 60% selected funds are then ranked with our Quantitative Model developed for Fund Selection adjusted for ESG. From each of the six sub-universes (four for equity funds and two for fixed income funds) we take the 10 to 15 highest scores. In the next step we apply a three factor (equal

weight) ranking and sort them for max Momentum, low Volatility and Quality. For ESG incorporation, Quality may include ESG and Governance scores (equity funds) or Environmental Scores (Fixed Income Funds). In the final stage of portfolio construction we adjust the asset class exposure as well as the geographic/style allocation based on our assessment of the current market conditions and of the fund's or the account's specific mandate and investment guidelines.

**OO 11.5** For your externally managed pooled funds, describe any mechanisms in place to set expectations as part of the appointment or commitment process.

As already explained in section 11.4, apart from relying on the quantitative fund selection model, our qualitative fund selection criteria and the ESG scoring provided by various well-respected and widely accepted providers, we do engage closely with the representatives of our third party fund providers who either arrange one-to-one meetings with the dedicated fund managers or with the ESG or Sustainability analysis team. In both cases we engage actively with our counterparties in order to ensure that the ESG integration process they follow is of the essence and does not solely rely on scorings offered by data providers. Moreover and what is of a primordial importance for our investment management teams is the evolution and progress exhibited in the ESG analysis space by the dedicated teams of our fund providers. It is at this second aspect that we pay enormous attention in order to make sure that ESG is applied in progressively deeper manner that will eventually bring about change in the environment, the society and the way corporations operate.

<b>OO 12</b>	<b>Mandatory</b>	<b>Public</b>	<b>Gateway</b>	<b>General</b>
--------------	------------------	---------------	----------------	----------------

**OO 12.1** Below are all applicable modules or sections you may report on. Those which are mandatory to report (asset classes representing 10% or more of your AUM) are already ticked and read-only. Those which are voluntary to report on can be opted into by ticking the box.

**Core modules**

- Organisational Overview
- Strategy and Governance

**RI implementation directly or via service providers**

**Direct - Listed Equity incorporation**

- Listed Equity incorporation

**Direct - Listed Equity active ownership**

- Engagements

Direct - Fixed Income

- Fixed income - SSA
- Fixed income - Corporate (non-financial)

Closing module

- Closing module

Peering questions

OO FI 03	Mandatory	Public	Descriptive	General
----------	-----------	--------	-------------	---------

Update: this indicator has changed from "Mandatory to report, voluntary to disclose" to "Mandatory". **Your response to this indicator will be published in the Public Transparency Report.** This change is to enable improved analysis and peering.

**OO FI 03.1** Indicate the approximate (+/- 5%) breakdown of your SSA investments, by developed markets and emerging markets.

SSA	Developed markets	47
	Emerging markets	53
	Total	100%

**OO FI 03.2** Indicate the approximate (+/- 5%) breakdown of your corporate and securitised investments by investment grade or high-yield securities.

Type	Investment grade (+/- 5%)	High-yield (+/- 5%)	Total internally managed
Corporate (non-financial)	<input type="radio"/> >50% <input checked="" type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%	<b>100%</b>

**OO FI 03.3**

Additional information. [Optional]

As already mentioned, 53% of our total AUM is invested in Fixed Income. Out of the total nominal amount, 57% is invested in SSA instruments with 53% in the EM space due to the heavy home bias and the categorization of our country as EM. In this respect, the majority of our internally managed fixed income instruments in the corporate non-financial space pertain to issuers domiciled in Greece, with credit ratings below investment grade with the exception of one major issuer that holds the BBB- rating. This brief description covers the two thirds of our internally managed long only strategies. Our Absolute Return strategy, which ended the year at approximately EUR 200 million, has a home bias by up to a maximum of 25% and is thus an active holder of SSA, Corporate non-Financials and to a lesser extent Corporate Financials in the investment grade space. Its target volatility strategy is attained through the efficient use of derivative instruments and FX strategies as an overlay in the underlying portfolio. Last, but not least, our special purpose funds that have been purposely set up to be used by the Group's ex-insurance arm as unit-linked vehicles, mainly comprise EM SSA instruments.

If you are invested in private debt and reporting on ratings is not relevant for you, please indicate below

OO FI 03.2 is not applicable as our internally managed fixed income assets are invested only in private debt.

# EUROBANK ASSET MANAGEMENT MFMC

## Reported Information

### Public version

### Strategy and Governance

## PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

## Investment policy

SG 01

Mandatory

Public

Core Assessed

General

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

SG 01.1

Indicate if you have an investment policy that covers your responsible investment approach.

Yes

SG 01.2

Indicate the components/types and coverage of your policy.

Select all that apply

Policy components/types	Coverage by AUM
<input checked="" type="checkbox"/> Policy setting out your overall approach <input type="checkbox"/> Formalised guidelines on environmental factors <input type="checkbox"/> Formalised guidelines on social factors <input type="checkbox"/> Formalised guidelines on corporate governance factors <input type="checkbox"/> Fiduciary (or equivalent) duties <input checked="" type="checkbox"/> Asset class-specific RI guidelines <input type="checkbox"/> Sector specific RI guidelines <input checked="" type="checkbox"/> Screening / exclusions policy <input checked="" type="checkbox"/> Engagement policy <input type="checkbox"/> (Proxy) voting policy <input type="checkbox"/> Other, specify (1) <input type="checkbox"/> Other, specify(2)	<input type="radio"/> Applicable policies cover all AUM <input type="radio"/> Applicable policies cover a majority of AUM <input checked="" type="radio"/> Applicable policies cover a minority of AUM



**SG 01.3**

Indicate if the investment policy covers any of the following

- Your organisation's definition of ESG and/or responsible investment and it's relation to investments
- Your investment objectives that take ESG factors/real economy influence into account
- Time horizon of your investment
- Governance structure of organisational ESG responsibilities
- ESG incorporation approaches
- Active ownership approaches
- Reporting
- Climate change
- Understanding and incorporating client / beneficiary sustainability preferences
- Other RI considerations, specify (1)
- Other RI considerations, specify (2)

**SG 01.4**

Describe your organisation's investment principles and overall investment strategy, interpretation of fiduciary (or equivalent) duties, and how they consider ESG factors and real economy impact.

Eurobank Asset Management MFMC aims to have an impact through its investments without excluding sectors and investments. Our belief is that the practice of exclusions and negative screenings does not contribute to the improvement of corporate practices and the evolution of activities that condone to a fight against climate change, a more equal society and a better corporate world. Thus, Eurobank Asset Management MFMC actively seeks sectors and investments with positive impact on ESG issues. Overall, Eurobank Asset Management MFMC acknowledges the importance of responsibility, sustainability and ESG-related risks and opportunities due to the responsibility and sustainability strategy of the Group in which it belongs, its active participation in renowned ESG organizations, the evolution and stable growth of the ESG investment market, the turn of the investment industry towards new ESG investment products to meet the increasing demand primarily from institutional investors and progressively from retail investors, the new EU regulation on the whole spectrum of sustainability (Sustainable Finance Action Plan, Green Bond Standards, EU Taxonomy, Sustainable Investments Disclosure Rules, ESG benchmarks) and the competitive performance of ESG incorporating strategies on the medium to long term versus traditional approaches to investment which focus only on profit maximisation.

**SG 01.5**

Provide a brief description of the key elements, any variations or exceptions to your investment policy that covers your responsible investment approach. [Optional]

At Eurobank Asset Management MFMC we started gradually incorporating ESG factors in our investment strategy since the fall of 2018 with the aim to (i) align with the widespread sustainability and ESG investment market trends, meet regulatory requirements of the European Insurance and Occupational Pensions Authority, create and maximize shared value, develop expertise in exhibiting outstanding performance with new ESG strategies, promote responsibility and accountability in our industry, apply transparent policies of asset management, promote sound corporate governance and socially responsible corporate culture, establish processes on environment, natural resources, human rights and social engagement, apply the new EU Regulation on Sustainable Investment Disclosure Rules and be one of the pioneers in the industry in Greece and in the wider region of Southeastern Europe where the Eurobank Group maintains presence.

Regarding the incorporation of ESG factors in our investment decision making process and as we can only be proactive through security selection in our own country and in the countries of the wider region of Southeastern Europe that most of the companies we invest in have a presence, we tend to opt for factors that are most relevant for the region. In this respect, in the Environmental section, we do focus on energy efficiency and renewable sources of energy that are very crucial in our country that has been heavily and persistently relying on fossil fuels, in water scarcity and efficient use of water due to the inefficiencies related to obsolete water infrastructure, in waste management and waste disposal that has not been seriously addressed up to recent days, in recycling that has not been addressed rendering our economy a non-cyclical economy and in the protection of biodiversity. In the Society section, we do focus on the equality issues in the use of human capital, in the importance of education and skill development and in the provision of occupational/company retirement schemes to complement the staggering first pillar of pensions. In the Governance section we are particularly

sensitive based on our belief that efficient corporate governance is the cornerstone and prerequisite of financial performance. In this context, we do recognize the active role that we could play in the area of mid-cap companies of our wider region that traditionally lack sound corporate governance indicating high risks in business continuity and integrity.

Our true belief both as a corporation and as an investment manager relies on the 17th SDG "Partnership for Goals" which encapsulates the philosophy that also permeates our investment policy and the investment strategy that we apply avoiding negative screening and exclusions and opting for positive screening, norms based screening and reliance on scoring data offered by specialist houses for our global holdings whilst also engaging in constructive engagement and interaction with the management of companies of our region in which we select to invest.

No

SG 02	Mandatory	Public	Core Assessed	PRI 6
-------	-----------	--------	---------------	-------

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

<b>SG 02.1</b>	Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.
----------------	--

- Policy setting out your overall approach
- Asset class-specific RI guidelines
- Screening / exclusions policy
- Engagement policy
- We do not publicly disclose our investment policy documents

<b>SG 02.2</b>	Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document.
----------------	---

- Your organisation's definition of ESG and/or responsible investment and it's relation to investments
- Your investment objectives that take ESG factors/real economy influence into account
- Time horizon of your investment
- Governance structure of organisational ESG responsibilities
- ESG incorporation approaches
- Reporting
- Understanding and incorporating client / beneficiary sustainability preferences
- We do not publicly disclose any investment policy components

SG 03	Mandatory	Public	Core Assessed	General
-------	-----------	--------	---------------	---------

<b>SG 03.1</b>	Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.
----------------	---

Yes

**SG 03.2**

Describe your policy on managing potential conflicts of interest in the investment process.

The below is an indicative, but non-comprehensive list of circumstances in which conflict of interests may arise during the provision of investment services, as identified by Eurobank Asset Management MFMC:

The company may not inform its clients of potential risks related to an investment or to the transaction costs of such investment, giving priority to the company's interests rather than to those of its clients.

The company, during the provision of advisory or discretionary investment services, may give priority to the selection of investment products of its own issuance or investment products for which it has own interest, in order to maximize or sustain existing profit. The company may also choose to manage specific types of portfolios in order to receive higher management fees and/or commissions related to the performance of such portfolios, whereas priority should be attributed to the investment needs of its clients and to the efficient management of their funds, taking into account the investment risks the clients can tolerate.

The company may be a buyer/seller for its own account and at the same time it may also be a buyer/seller for the account of its clients, thus executing different or contrary transactions.

Continued below.

No

**SG 03.3**

Additional information. [Optional]

The company may act as representative for more than one clients simultaneously and execute transactions in financial instruments for different clients, whereby it may not charge the same fees or commissions or any other financial benefits to all clients.

The company or the Group may provide lead manager and public offering services to the issuer of a financial instrument and at the same time the company or the Group may proceed with the extension of loans to the issuer of such financial instrument or participate in such issuer's share capital

The company or the Group may provide lead manager services or advisory services for the public offering or the placement of financial instruments with or without guarantees and at the same time also provide portfolio management services to the issuing companies-clients, or participate in the pre-marketing of such initial public offering, or publish analysis for the offered for listing financial instruments or provide research for the issuing company.

During the provision of discretionary portfolio management services, the decisions related to the management of the portfolio of a specific client may adversely affect another client or it may give priority to the execution of transactions for some of its clients adversely affecting other clients

The company or the Group may offer lead manager or advisory for listing services simultaneously to two companies-clients, which may be operating in the same sector but may be competitors (this applies to cases of companies' mergers or acquisitions).

The Directors of the company or the Group (shareholders with stakes of over 5%, members of the Board of Directors, employees, co-operating entities or individuals, et. al.) may be accepting gifts of considerable value or fees or commissions other than the pre-defined and pre-agreed remuneration packages for their services, and which could be considered as means of special treatment of one client adversely affecting other clients.

The Directors of the company or the Group may acquire stakes or be involved in business activities or maintain personal relationships with a client that could potentially adversely affect other clients or they may act as representatives of clients for their investment accounts in order to execute brokerage transactions in order to ensure higher profits for some clients versus other clients.

The Directors of the company or the Group may participate simultaneously or sequentially in the provision of investment or investment-related services and in general in investment activities that may prove contrary to conflict of interests' management.

The Directors of the company or the Group that hold privileged information regarding financial instruments may engage in transactions in such instruments for their own benefit taking advantage of the information they have access to due to their professional activities or may use such privileged information for the benefit of one client adversely affecting other clients.

A financial analyst of the company or the Group may produce analysis- whether for external or internal use only - on the financial instruments issued by a specific company in which the financial analyst or an affiliated with him person may hold a stake equal to or more than 5% of the share capital of the issuing company.

The Directors of the company or the Group that are involved in Sales and Distribution, may receive further remuneration or may be offered special commissions for the promotion of specific investment services or the promotion of specific investment products.

The company or the Group may be receiving retrocessions for the sale of instruments (indicatively, sales commissions by issuers of financial instruments or sales commissions by co-operating mutual fund management companies or by co-operating stock brokerage companies).

The company or the Group may be promoting the distribution of financial instruments of a specific issuer whereas at the same time the company or the Group may be holding information (not publicly available) regarding the issuer due to the extension of loan facilities or to the provision of advisory services by another company of the Group to the specific issuer.

The company or the Group may be paying commissions or retainer fees to third parties for their inducement or intermediation for transactions in financial instruments without specifying the specific transaction.

## Objectives and strategies

SG 05	Mandatory	Public	Gateway/Core Assessed	General
-------	-----------	--------	-----------------------	---------

SG 05.1	Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.
---------	---

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad-hoc basis
- It is not set/reviewed

SG 05.2	Additional information. [Optional]
---------	------------------------------------

The portfolios are reviewed on a monthly basis as to the proportion of their assets that have been selected according to ESG criteria. On a quarterly basis, the externally managed pooled funds are re-assessed and new selection may be made to bring the portfolios closer to full ESG integration. On a bi-annual basis, the ESG committee formally convenes in order to assess the gaps and take decisions as to the ways of improvement of the ESG integration process. It should be noted that the ESG committee also convenes on a quarterly basis to review the results of the quarterly rebalancings.

## Governance and human resources

SG 07	Mandatory	Public	Core Assessed	General
-------	-----------	--------	---------------	---------

SG 07.1	Indicate the internal and/or external roles used by your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for responsible investment.
---------	---

## Roles

- Board members or trustees
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Internal Roles (triggers other options)

## Select from the below internal roles

- Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Other Chief-level staff or head of department, specify  
FOF, IAM/DAM heads
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Portfolio managers
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Investment analysts
- Dedicated responsible investment staff
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Investor relations
- Other role, specify (1)
- Other role, specify (2)
- External managers or service providers
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment

### SG 07.2

For the roles for which you have RI oversight/accountability or implementation responsibilities, indicate how you execute these responsibilities.

The oversight/accountability roles are effectuated through the ESG Committee currently chaired by the Vice Chairman of the Board & Deputy CEO of the company who also has the role of communicating all actions and decisions to the Company's Board.

Implementation of ESG integration is performed by portfolio managers and overviewed respectively by the Head of Fund of Funds and Fund Selection and Head of Institutional Asset Management and Discretionary Asset Management. As already explained in more detail in previous sections, these two distinct parts of the Investment Management Division are currently actively incorporating ESG factors either in their fund selection process or in

their security selection process with varying degrees of ESG implementation (best in class, norms based screening, ESG scoring, ESG engagement with local companies). Decisions regarding the evolution and enhancement of ESG integration is discussed at the level of the ESG Committee in which all of the colleagues mentioned herein are members. The specially dedicated portfolio managers, one from the Fund of Funds and Fund Selection and one from the Institutional Asset Management and Discretionary Asset Management are also members of this Committee.

<b>SG 07.3</b>	Indicate the number of dedicated responsible investment staff your organisation has.
----------------	--

<b>Number</b>
---------------

3

<b>SG 07.4</b>	Additional information. [Optional]
----------------	------------------------------------

In the number indicated above, we include the colleagues from the Investment Management Division that are responsible to design and improve through time the ESG incorporation in their respective investment process and to implement ESG incorporation in the portfolios they manage. As the definition above includes only people who dedicate the majority of their time in ESG activities, we have added a third person by means of consolidating the time of top management officials that dedicate a considerable amount of their time in all aspects of ESG within our company.

## Promoting responsible investment

<b>SG 09</b>	<b>Mandatory</b>	<b>Public</b>	<b>Core Assessed</b>	<b>PRI 4,5</b>
--------------	------------------	---------------	----------------------	----------------

<b>SG 09.1</b>	Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played.
----------------	---

**Select all that apply**

Principles for Responsible Investment

<b>Your organisation's role in the initiative during the reporting period (see definitions)</b>
---

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.  
[Optional]

We had been following the workings of the UN PRI for quite a long time being acquainted to its presence through our participation in various Investment Forums and in the conferences organized by our major external managers. Since the beginning of 2017 we decided to pursue the obvious sustainability trend and in 2018 we were the first Greek asset and fund management company to become a signatory of the PRI. It is noteworthy that following our initiative, some of our competitors from the Greek asset and fund management industry followed our steps.

- Asian Corporate Governance Association
- Australian Council of Superannuation Investors
- AVCA: Sustainability Committee
- France Invest – La Commission ESG
- BVCA – Responsible Investment Advisory Board
- CDP Climate Change
- CDP Forests
- CDP Water
- CFA Institute Centre for Financial Market Integrity
- Climate Action 100+
- Code for Responsible Investment in SA (CRISA)
- Council of Institutional Investors (CII)
- Eumedion
- Extractive Industries Transparency Initiative (EITI)
- ESG Research Australia
- Invest Europe Responsible Investment Roundtable
- Global Investors Governance Network (GIGN)
- Global Impact Investing Network (GIIN)
- Global Real Estate Sustainability Benchmark (GRESB)
- Green Bond Principles
- HKVCA: ESG Committee
- Institutional Investors Group on Climate Change (IIGCC)
- Interfaith Center on Corporate Responsibility (ICCR)
- International Corporate Governance Network (ICGN)
- Investor Group on Climate Change, Australia/New Zealand (IGCC)
- International Integrated Reporting Council (IIRC)
- Investor Network on Climate Risk (INCR)/CERES
- Local Authority Pension Fund Forum
- Principles for Financial Action in the 21st Century
- Principles for Sustainable Insurance
- Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify
- Responsible Finance Principles in Inclusive Finance
- Shareholder Association for Research and Education (Share)
- United Nations Environmental Program Finance Initiative (UNEP FI)
- United Nations Global Compact

- Other collaborative organisation/initiative, specify

Council for Sustainable Development - SEV (Federation of Hellenic Industries)

Your organisation's role in the initiative during the reporting year (see definitions)

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

Our aim is to embark on a constructive dialogue between the asset management industry and the companies listed in the Athens Exchange that are members of the Federation of Hellenic Industries.

- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify

SG 10	Mandatory	Public	Core Assessed	PRI 4
-------	-----------	--------	---------------	-------

**SG 10.1** Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.

- Yes

**SG 10.2** Indicate the actions your organisation has taken to promote responsible investment independently of collaborative initiatives. Provide a description of your role in contributing to the objectives of the selected action and the typical frequency of your participation/contribution.

- Provided or supported education or training programmes (this includes peer to peer RI support) Your education or training may be for clients, investment managers, actuaries, broker/dealers, investment consultants, legal advisers etc.)

Description

Have already described our initiatives in previous sections

Frequency of contribution

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

- Provided financial support for academic or industry research on responsible investment



### Description

Have already described our initiatives in previous sections

### Frequency of contribution

- Quarterly or more frequently
  - Biannually
  - Annually
  - Less frequently than annually
  - Ad hoc
  - Other
- Provided input and/or collaborated with academia on RI related work
- Encouraged better transparency and disclosure of responsible investment practices across the investment industry
- Spoke publicly at events and conferences to promote responsible investment

### Description

Have already described our initiatives in previous sections

### Frequency of contribution

- Quarterly or more frequently
  - Biannually
  - Annually
  - Less frequently than annually
  - Ad hoc
  - Other
- Wrote and published in-house research papers on responsible investment
- Encouraged the adoption of the PRI

### Description

Our initiative was followed by some of our competitors

### Frequency of contribution

- Quarterly or more frequently
  - Biannually
  - Annually
  - Less frequently than annually
  - Ad hoc
  - Other
- Responded to RI related consultations by non-governmental organisations (OECD, FSB etc.)

	Description
--	-------------

We have engaged with the Hellenic Asset and Fund Management Association

	Frequency of contribution
--	---------------------------

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

Wrote and published articles on responsible investment in the media

	Description
--	-------------

Have described these initiatives in previous sections

	Frequency of contribution
--	---------------------------

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

- A member of PRI advisory committees/ working groups, specify
- On the Board of, or officially advising, other RI organisations (e.g. local SIFs)
- Other, specify

No

<b>SG 10.3</b>	Describe any additional actions and initiatives that your organisation has taken part in during the reporting year to promote responsible investment [Optional]
----------------	---

All the initiatives taken by our Company with the scope of promoting responsible investment and sustainability awareness during the reporting year have been extensively described in section 6.1.

<b>Outsourcing to fiduciary managers and investment consultants</b>			
---	--	--	--

<b>SG 12</b>	<b>Mandatory</b>	<b>Public</b>	<b>Core Assessed</b>	<b>PRI 4</b>
--------------	------------------	---------------	----------------------	--------------

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

**SG 12.1**

Indicate whether your organisation uses investment consultants.

- Yes, we use investment consultants
- No, we do not use investment consultants.

**ESG issues in asset allocation****SG 13****Mandatory****Public****Descriptive****PRI 1****SG 13.1**

Indicate whether the organisation carries out scenario analysis and/or modelling, and if it does, provide a description of the scenario analysis (by asset class, sector, strategic asset allocation, etc.).

- Yes, in order to assess future ESG factors
- Yes, in order to assess future climate-related risks and opportunities
- No, our organisation does not currently carry out scenario analysis and/or modelling

**SG 13.3**

Additional information. [OPTIONAL]

Our organisation carries out scenarios analysis and modelling in order to assess other types of financial risks. However, assessing sustainability risks using scenario analysis is part of our future plans in order to best identify and measure ESG related risks.

**Asset class implementation not reported in other modules****SG 17****Mandatory****Public****Descriptive****General****SG 17.1**

Describe how you address ESG issues for externally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.

Asset Class	Describe what processes are in place and the outputs or outcomes achieved
Listed equities - ESG incorporation	<p>We have provided an extensive description of our fund selection process in order to identify funds that are rated as ESG by well trusted independent European and global organizations or government agencies in a previous section (in the 00 range) as well as funds that are ESG compliant. For such funds we assign a lower score of 66 versus a 100 score for the ESG rated funds. Our quantitative model and the qualitative fund selection tools are then applied in order to select the best funds for each asset class or sector. A further level of signalling are the Mercer ESG ratings from Morningstar as well as the ratings given to the funds under scrutiny by the Fund Selection process followed by our Fund of Funds and Fund Selection team which produces an ESG focused ranking list.</p>
Listed equities - engagement	<p>We rely upon our co-operating external managers to engage directly with companies in order to assess their ESG compliance. In order to ensure the integrity of the process we have engaged with the sustainability analysis teams of our co-operating external managers as well as with the dedicated portfolio managers who implement such analysis in the security selection.</p>
Fixed income - SSA	<p>We have provided an extensive description of our fund selection process in order to identify funds that are rated as ESG by well trusted independent European and global organizations or government agencies in a previous section (in the 00 range) as well as funds that are ESG compliant. For such funds we assign a lower score of 66 versus a 100 score for the ESG rated funds. Our quantitative model and the qualitative fund selection tools are then applied in order to select the best funds for each asset class or sector. A further level of signalling are the Mercer ESG ratings from Morningstar as well as the ratings given to the funds under scrutiny by the Fund Selection process followed by our Fund of Funds and Fund Selection team which produces an ESG focused ranking list.</p> <p>Furthermore, we rely upon our co-operating external managers to engage directly with sovereign and supra-national issuers in order to assess use of proceeds. In order to ensure the integrity of the process we have engaged with the sustainability analysis teams of our co-operating external managers as well as with the dedicated portfolio managers who implement such analysis in the security selection.</p>
Fixed income - Corporate (financial)	<p>We have provided an extensive description of our fund selection process in order to identify funds that are rated as ESG by well trusted independent European and global organizations or government agencies in a previous section (in the 00 range) as well as funds that are ESG compliant. For such funds we assign a lower score of 66 versus a 100 score for the ESG rated funds. Our quantitative model and the qualitative fund selection tools are then applied in order to select the best funds for each asset class or sector. A further level of signalling are the Mercer ESG ratings from Morningstar as well as the ratings given to the funds under scrutiny by the Fund Selection process followed by our Fund of Funds and Fund Selection team which produces an ESG focused ranking list.</p> <p>Furthermore, we rely upon our co-operating external managers to engage directly with such issuers to assess the use of proceeds. In order to ensure the integrity of the process we have engaged with the sustainability analysis teams of our co-operating external managers as well as with the dedicated portfolio managers who implement such analysis in the security selection.</p>
Fixed income - Corporate (non-financial)	<p>We have provided an extensive description of our fund selection process in order to identify funds that are rated as ESG by well trusted independent European and global organizations or government agencies in a previous section (in the 00 range) as well as funds that are ESG compliant. For such funds we assign a lower score of 66 versus a 100 score for the ESG rated funds. Our quantitative model and the qualitative fund selection tools are then applied in order to select the best funds for each asset class or sector. A further level of signalling are the Mercer ESG ratings from Morningstar as well as the ratings given to the funds under scrutiny by the Fund Selection process followed by our Fund of Funds and Fund Selection team which produces an ESG focused ranking list.</p>

	Furthermore, we rely upon our co-operating external managers to engage directly with companies in order to assess their ESG compliance. In order to ensure the integrity of the process we have engaged with the sustainability analysis teams of our co-operating external managers as well as with the dedicated portfolio managers who implement such analysis in the security selection.
Commodities	We have provided an extensive description of our fund selection process in order to identify funds that are rated as ESG by well trusted independent European and global organizations or government agencies in a previous section (in the 00 range) as well as funds that are ESG compliant. For such funds we assign a lower score of 66 versus a 100 score for the ESG rated funds. Our quantitative model and the qualitative fund selection tools are then applied in order to select the best funds for each asset class or sector. A further level of signalling are the Mercer ESG ratings from Morningstar as well as the ratings given to the funds under scrutiny by the Fund Selection process followed by our Fund of Funds and Fund Selection team which produces an ESG focused ranking list.
Money market instruments	We have provided an extensive description of our fund selection process in order to identify funds that are rated as ESG by well trusted independent European and global organizations or government agencies in a previous section (in the 00 range) as well as funds that are ESG compliant. For such funds we assign a lower score of 66 versus a 100 score for the ESG rated funds. Our quantitative model and the qualitative fund selection tools are then applied in order to select the best funds for each asset class or sector. A further level of signalling are the Mercer ESG ratings from Morningstar as well as the ratings given to the funds under scrutiny by the Fund Selection process followed by our Fund of Funds and Fund Selection team which produces an ESG focused ranking list.

## Communication

SG 19	Mandatory	Public	Core Assessed	PRI 2, 6
-------	-----------	--------	---------------	----------

SG 19.1	Indicate whether your organisation typically discloses asset class specific information proactively. Select the frequency of the disclosure to clients/beneficiaries and the public, and provide a URL to the public information.
---------	---

### Listed equity - Incorporation

#### Do you disclose?

- We do not proactively disclose it to the public and/or clients/beneficiaries
- We disclose to clients/beneficiaries only.
- We disclose it publicly

### Listed equity - Engagement

Do you disclose?

- We do not disclose to either clients/beneficiaries or the public.
- We disclose to clients/beneficiaries only.
- We disclose to the public

Fixed income

Do you disclose?

- We do not disclose to either clients/beneficiaries or the public.
- We disclose to clients/beneficiaries only.
- We disclose to the public

**SG 19.2**

Additional information [Optional]

As we just completed the first full year of our ESG engagement, we are at the first stages of incorporation and engagement and as such we have not embarked in disclosure to either clients, beneficiaries or the public. As our integration rolls out and increases in scope we will review our disclosure policy.

# EUROBANK ASSET MANAGEMENT MFMC

## Reported Information

### Public version

### Direct - Listed Equity Incorporation

## PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

## ESG incorporation in actively managed listed equities

### Implementation processes


LEI 01	Mandatory	Public	Gateway	PRI 1
--------	-----------	--------	---------	-------

**LEI 01.1**


Indicate which ESG incorporation strategy and/or combination of strategies you apply to your actively managed listed equities; and the breakdown of your actively managed listed equities by strategy or combination of strategies.

#### ESG incorporation strategy (select all that apply)

- Screening alone (i.e., not combined with any other strategies)
- Thematic alone (i.e., not combined with any other strategies)
- Integration alone (i.e., not combined with any other strategies)
- Screening and integration strategies
- Thematic and integration strategies
- Screening and thematic strategies

Percentage of active listed equity to which the strategy is applied — you may estimate +/- 5%	 40
---	--

- All three strategies combined
- We do not apply incorporation strategies

Percentage of active listed equity to which the strategy is applied — you may estimate +/- 5%	 60
---	--

Total actively managed listed equities

100%

**LEI 01.2**

Describe your organisation's approach to ESG incorporation and the reasons for choosing the particular strategy/strategies.

For our actively managed global equities we adopt screening strategies in combination with thematic investments as we are not in a position to implement integration due to the small size of the AUM invested in this space. However, as we progress in the implementation of the principles we expect to be able to apply ESG incorporation for the 60% of the actively managed equities that are mainly Greek and Emerging Europe stocks. We also use ESG scoring figures produced by data providers. Last, but not least, we also rely heavily on fundamental financial analysis as one of the basic pillars of our analysis and selection.



## (A) Implementation: Screening

LEI 04

Mandatory

Public

Descriptive

PRI 1

LEI 04.1

Indicate and describe the type of screening you apply to your internally managed active listed equities.

### Type of screening

- Negative/exclusionary screening
- Positive/best-in-class screening

### Screened by

- Product
- Activity
- Sector
- Country/geographic region
- Environmental and social practices and performance
- Corporate governance

### Description

We use positive screenings for the activities of companies or sectors of business in combination with ESG scorings for companies that we get from co-operating data providers.

- Norms-based screening

### Screened by

- UN Global Compact Principles
- The UN Guiding Principles on Business and Human Rights
- International Labour Organization Conventions
- United Nations Convention Against Corruption
- OECD Guidelines for Multinational Enterprises
- Other, specify

### Description

UN Global Compact membership is a strong indicator. Moreover, companies gradually tend to publish which SDGs they tend to observe and the proportion of achievement of the selected goals.

LEI 04.2

Describe how you notify clients and/or beneficiaries when changes are made to your screening criteria.

As we have just completed the first full year of ESG implementation, we have not made changes in our screening criteria to date.

LEI 05	Mandatory	Public	Core Assessed	PRI 1
--------	-----------	--------	---------------	-------

**LEI 05.1** Indicate which processes your organisation uses to ensure ESG screening is based on robust analysis.

- Comprehensive ESG research is undertaken or sourced to determine companies' activities and products.
- Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies.
- External research and data used to identify companies to be excluded/included is subject to internal audit by ESG/RI staff, the internal audit function or similar.
- Third-party ESG ratings are updated regularly to ensure that portfolio holdings comply with fund policies.
- Trading platforms blocking / restricting flagged securities on the black list.
- A committee, body or similar with representatives independent of the individuals who conduct company research reviews some or all screening decisions.
- A periodic review of internal research is carried out.
- Review and evaluation of external research providers.
- Other; specify
- None of the above

**LEI 05.3** Indicate how frequently third party ESG ratings are updated for screening purposes.

- Quarterly or more frequently
- Bi-Annually
- Annually
- Less frequently than annually

**(B) Implementation: Thematic**

LEI 07	Mandatory	Public	Descriptive	PRI 1
--------	-----------	--------	-------------	-------

**LEI 07.1** Indicate the type of sustainability thematic funds or mandates your organisation manages.

- Environmentally themed funds
- Socially themed funds
- Combination of themes

**LEI 07.2** Describe your organisation's processes relating to sustainability themed funds. [Optional]

We are currently managing a dedicated Fund of Funds with flexible allocation named (LF) FOF ESG Focus which is not dedicated to specific themes but selects funds according to the ESG rating that is derived from a robust ESG fund selection process.

Furthermore, we apply ESG criteria in the security (bonds and stocks) and fund selection for the portfolios of occupational funds that have been mandated to us. We are free to select thematic investments or apply ESG factors for security selection according to our policies. In effect, the clients have not mandated us to pursue a specific ESG integration method,

# EUROBANK ASSET MANAGEMENT MFMC

## Reported Information

### Public version

### Direct - Listed Equity Active Ownership

## PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

## Overview

LEA 01

Mandatory

Public

Core Assessed

PRI 2

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

LEA 01.1

Indicate whether your organisation has an active ownership policy (includes engagement and/or voting).

Yes

LEA 01.2

Attach or provide a URL to your active ownership policy.

Attachment provided:

URL provided:

LEA 01.3

Indicate what your active engagement policy covers:

General approach to Active Ownership

- Conflicts of interest
- Alignment with national stewardship code requirements
- Assets/funds covered by active ownership policy
- Expectations and objectives
- Engagement approach

Engagement

- ESG issues
- Prioritisation of engagement
- Methods of engagement
- Transparency of engagement activities
- Due diligence and monitoring process
- Insider information
- Escalation strategies
- Service Provider specific criteria
- Other; (specify)
- (Proxy) voting approach
- Other
- None of the above

No

**LEA 01.4**

Do you outsource any of your active ownership activities to service providers?

 Yes No**Engagement****LEA 02****Mandatory****Public****Core Assessed****PRI 1,2,3****LEA 02.1**

Indicate the method of engagement, giving reasons for the interaction.

Type of engagement	Reason for interaction
Individual / Internal staff engagements	<input type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input type="checkbox"/> We do not engage via internal staff
Collaborative engagements	<input type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> We do not engage via collaborative engagements
Service provider engagements	<input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> To gain an understanding of ESG strategy and/or management <input type="checkbox"/> We do not engage via service providers

**LEA 02.2**

Indicate whether your organisation plays a role in the engagement process that your service provider conducts.

 Yes No**LEA 03****Mandatory****Public****Core Assessed****PRI 2****New selection options have been added to this indicator. Please review your prefilled responses carefully.**

**LEA 03.1** Indicate whether your organisation has a formal process for identifying and prioritising engagements.

- Yes
- No

**LEA 04** **Mandatory** **Public** **Core Assessed** **PRI 2**

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

**LEA 04.1** Indicate whether you define specific objectives for your organisation’s engagement activities.

Individual / Internal staff engagements	<input type="radio"/> All engagement activities <input type="radio"/> Majority of engagement activities <input type="radio"/> Minority of engagement activities <input checked="" type="radio"/> We do not define specific objectives for engagement activities carried out by internal staff
Service-provider engagements	<input type="radio"/> All engagement activities <input type="radio"/> Majority of engagement activities <input type="radio"/> Minority of engagement activities <input checked="" type="radio"/> We do not define specific objectives for engagement activities carried out by our service providers

**LEA 05** **Mandatory** **Public** **Core Assessed** **PRI 2**

**LEA 05.1** Indicate whether you monitor and/or review engagement outcomes.

Individual / Internal staff engagements	<input type="radio"/> Yes, in all cases <input type="radio"/> Yes, in a majority of cases <input type="radio"/> Yes, in a minority of cases <input checked="" type="radio"/> We do not monitor, or review engagement outcomes when the engagement is carried out by our internal staff.
Service-provider engagements	<input type="radio"/> Yes, in all cases <input type="radio"/> Yes, in a majority of cases <input type="radio"/> Yes, in a minority of cases <input checked="" type="radio"/> We do not monitor, or review engagement outcomes when the engagement is carried out by our service providers.

**LEA 06** **Mandatory** **Public** **Additional Assessed** **PRI 2,4**

**LEA 06.1**

Indicate whether your organisation has an escalation strategy when engagements are unsuccessful.

- Yes
- No

**LEA 08**

**Mandatory**

**Public**

**Gateway**

**PRI 2**

**LEA 08.1**

Indicate whether you track the number of your engagement activities.

Type of engagement	Tracking engagements
<b>Individual/Internal staff engagements</b>	<ul style="list-style-type: none"><li><input type="radio"/> Yes, we track the number of our engagements in full</li><li><input type="radio"/> Yes, we partially track the number of our engagements</li><li><input checked="" type="radio"/> We do not track</li></ul>
<b>Service-provider engagements</b>	<ul style="list-style-type: none"><li><input type="radio"/> Yes, we track the number of service-provider engagements in full</li><li><input type="radio"/> Yes, we partially track the number of our service-provider engagements</li><li><input checked="" type="radio"/> We do not track</li></ul>

# EUROBANK ASSET MANAGEMENT MFMC

## Reported Information

### Public version

### Direct - Fixed Income

## PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

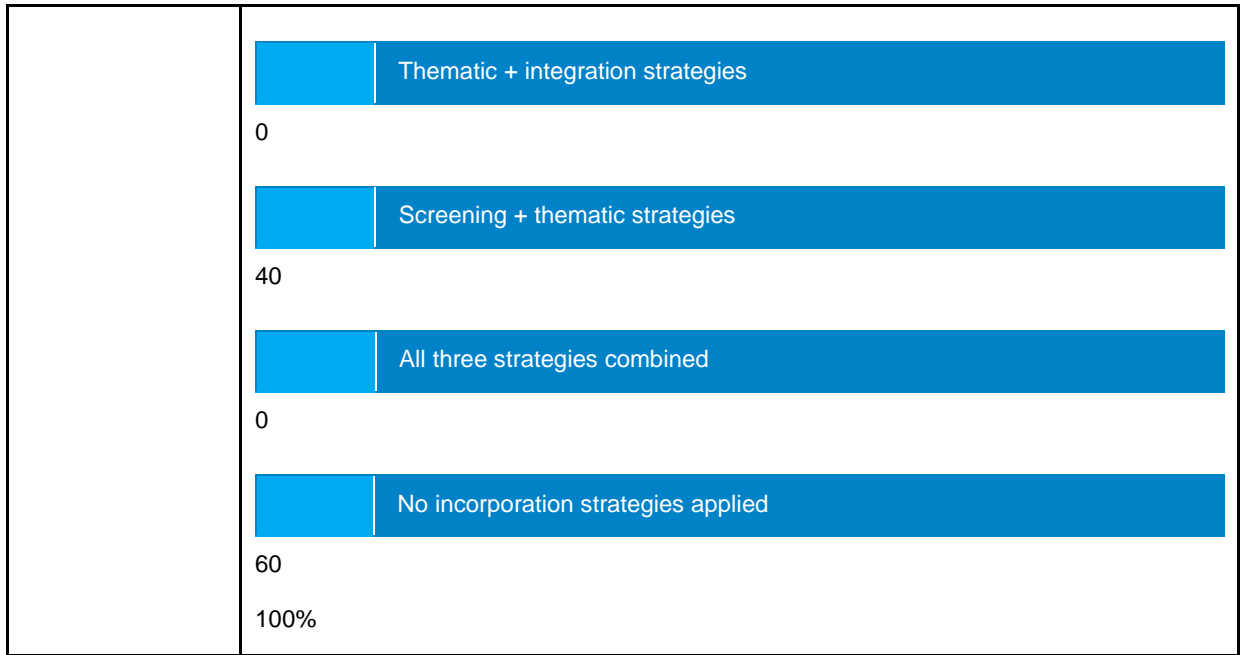


## ESG incorporation in actively managed fixed income

### Implementation processes

FI 01	Mandatory	Public	Gateway	PRI 1
FI 01.1	Indicate (1) Which ESG incorporation strategy and/or combination of strategies you apply to your actively managed fixed income investments; and (2) The proportion (+/- 5%) of your total actively managed fixed income investments each strategy applies to.			

SSA	<table border="1"> <thead> <tr> <th>Strategy</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Screening alone</td> <td>0</td> </tr> <tr> <td>Thematic alone</td> <td>0</td> </tr> <tr> <td>Integration alone</td> <td>0</td> </tr> <tr> <td>Screening + integration strategies</td> <td>0</td> </tr> <tr> <td>Thematic + integration strategies</td> <td>0</td> </tr> <tr> <td>Screening + thematic strategies</td> <td>0</td> </tr> <tr> <td>All three strategies combined</td> <td>0</td> </tr> <tr> <td>No incorporation strategies applied</td> <td>100</td> </tr> </tbody> </table>	Strategy	Percentage	Screening alone	0	Thematic alone	0	Integration alone	0	Screening + integration strategies	0	Thematic + integration strategies	0	Screening + thematic strategies	0	All three strategies combined	0	No incorporation strategies applied	100
Strategy	Percentage																		
Screening alone	0																		
Thematic alone	0																		
Integration alone	0																		
Screening + integration strategies	0																		
Thematic + integration strategies	0																		
Screening + thematic strategies	0																		
All three strategies combined	0																		
No incorporation strategies applied	100																		
Corporate (non-financial)	<table border="1"> <thead> <tr> <th>Strategy</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Screening alone</td> <td>0</td> </tr> <tr> <td>Thematic alone</td> <td>0</td> </tr> <tr> <td>Integration alone</td> <td>0</td> </tr> <tr> <td>Screening + integration strategies</td> <td>0</td> </tr> </tbody> </table>	Strategy	Percentage	Screening alone	0	Thematic alone	0	Integration alone	0	Screening + integration strategies	0								
Strategy	Percentage																		
Screening alone	0																		
Thematic alone	0																		
Integration alone	0																		
Screening + integration strategies	0																		



<b>FI 01.2</b>	<b>Describe your reasons for choosing a particular ESG incorporation strategy and how combinations of strategies are used.</b>
----------------	--

We have opted for screening and thematic strategies as we have not yet embarked in full ESG factor implementation through analysis insofar as our local corporate bond selection is concerned. With regards to our global corporate selection we rely upon the ESG skills of our co-operating external fund managers.

<b>FI 03</b>	<b>Mandatory</b>	<b>Public</b>	<b>Additional Assessed</b>	<b>PRI 1</b>
--------------	------------------	---------------	----------------------------	--------------

<b>FI 03.1</b>	<b>Indicate how you ensure that your ESG research process is robust:</b>
----------------	--

- Comprehensive ESG research is undertaken internally to determine companies' activities; and products and/or services
- Issuers are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- Issuer information and/or ESG ratings are updated regularly to ensure ESG research is accurate
- Internal audits and regular reviews of ESG research are undertaken in a systematic way.
- A materiality/sustainability framework is created and regularly updated that includes all the key ESG risks and opportunities for each sector/country.
- Other, specify
- None of the above

**FI 03.2** Describe how your ESG information or analysis is shared among your investment team.

- ESG information is held within a centralised database and is accessible to all investment staff
- ESG information is displayed on front office research platforms
- ESG information is a standard item on all individual issuer summaries, research notes, ‘tear sheets’, or similar documents
- Investment staff are required to discuss ESG information on issuers as a standard item during investment committee meetings
- Records capture how ESG information and research was incorporated into investment decisions
- Other, specify  
 ESG information is shared during the weekly investment committees if the ESG issues are of concern each time
- None of the above

**(A) Implementation: Screening**

<b>FI 04</b>	<b>Mandatory</b>	<b>Public</b>	<b>Gateway</b>	<b>PRI 1</b>
--------------	------------------	---------------	----------------	--------------

**FI 04.1** Indicate the type of screening you conduct.

Select all that apply

			<b>Corporate (non-financial)</b>	
Negative/exclusionary screening			<input type="checkbox"/>	
Positive/best-in-class screening			<input checked="" type="checkbox"/>	
Norms-based screening			<input checked="" type="checkbox"/>	

**FI 04.2** Describe your approach to screening for internally managed active fixed income

Internally managed active fixed income consists mainly of corporate bonds issued either locally or internationally by local issuers. In this respect, we apply positive screening and norms-based screening (if the latter is applicable), we use issuer ratings by ESG providers and we also engage in dialogue with the management of the issuer usually ahead of issues to be launched. During such presentations we delve specifically in the ESG aspects both of the issue with respect to the use of proceeds and to the overall ESG approach of the issuer. We also rely on fundamental analysis that comprises the basis of our company analysis and selection.

Regarding internally managed active fixed income in foreign issues, we apply positive and norms-based screening, we use issuer ratings by ESG providers and we also screen the use of proceeds that is stipulated for the specific issue.

<b>FI 06</b>	<b>Mandatory</b>	<b>Public</b>	<b>Core Assessed</b>	<b>PRI 1</b>
--------------	------------------	---------------	----------------------	--------------

**FI 06.1** Indicate which systems your organisation has to ensure that fund screening criteria are not breached in fixed income investments.

Type of screening	Checks
<b>Positive/best-in-class screening</b>	<input type="checkbox"/> Analysis is performed to ensure that issuers meet screening criteria <input checked="" type="checkbox"/> We ensure that data used for the screening criteria is updated at least once a year. <input type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input type="checkbox"/> Audits of fund holdings are undertaken yearly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above
<b>Norms-based screening</b>	<input type="checkbox"/> Analysis is performed to ensure that issuers meet screening criteria <input checked="" type="checkbox"/> We ensure that data used for the screening criteria is updated at least once a year. <input type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input type="checkbox"/> Audits of fund holdings are undertaken yearly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above

**(B) Implementation: Thematic**

**FI 08**      **Mandatory**      **Public**      **Core Assessed**      **PRI 1**

**FI 08.1** Indicate whether you encourage transparency and disclosure relating to the issuance of themed bonds as per the Green Bonds Principles, Social Bond Principles, or Sustainability Bond Guidelines..

- We require that themed bond proceeds are only allocated to environmentally or socially beneficial projects
- We require the issuer (or 3rd party assurer) to demonstrate a process which determines the eligibility of projects to which themed bond proceeds are allocated
- We require issuers to demonstrate a systematic and transparent process of disbursing themed bond proceeds to eligible projects until all funds are allocated
- We require issuers to report at least once per year on the projects to which proceeds have been allocated including a description of those projects
- Other, specify
- None of the above

**FI 08.2** Describe the actions you take when issuers do not disburse bond proceeds as described in the offering documents.

We have not encountered such a situation to date.

FI 09	Mandatory	Public	Additional Assessed	PRI 1
-------	-----------	--------	---------------------	-------

FI 09.1	Indicate how you assess the environmental or social impact of your thematic investments.
---------	--

- We require issuers to report at least once per year on specific environmental or social impacts resulting from our themed investments
- We ensure independent audits are conducted on the environmental or social impact of our investments
- We have a proprietary system to measure environmental and social impact
- We measure the impact of our themed bond investments on specific ESG factors such as carbon emissions or human rights
- Other, specify
- None of the above

# EUROBANK ASSET MANAGEMENT MFMC

## Reported Information

## Public version

## Confidence building measures

## PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

## Confidence building measures

CM1 01	Mandatory	Public	Additional Assessed	General
--------	-----------	--------	---------------------	---------

**CM1 01.1** Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:

- Third party assurance over selected responses from this year's PRI Transparency Report
- Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year
- Third party assurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year)
- Internal audit of the correct implementation of RI processes and/or accuracy of RI data (that have been reported to the PRI this year)
- Internal verification of responses before submission to the PRI (e.g. by the CEO or the board)
- Other, specify  
  - Review by our external ESG consultant
  - None of the above

CM1 02	Mandatory	Public	Descriptive	General
--------	-----------	--------	-------------	---------

**CM1 02.1** We undertook third party assurance on last year's PRI Transparency Report

- Whole PRI Transparency Report was assured last year
- Selected data was assured in last year's PRI Transparency Report
- We did not assure last year's PRI Transparency report
- None of the above, we were in our preparation year and did not report last year.

CM1 03	Mandatory	Public	Descriptive	General
--------	-----------	--------	-------------	---------

**CM1 03.1** We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:

- We adhere to an RI certification or labelling scheme
- We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report
- ESG audit of holdings
- Other, specify  
  - Co-operation with our ESG consultant in order to undertake confidence building measures
  - None of the above

CM1 04	Mandatory	Public	Descriptive	General
--------	-----------	--------	-------------	---------



**CM1 04.1**

Do you plan to conduct third party assurance of this year's PRI Transparency report?

- Whole PRI Transparency Report will be assured
- Selected data will be assured
- We do not plan to assure this year's PRI Transparency report