



Controversial weapons exclusion policy

STANWAHR excludes from its investments controversial weapons. These weapons cause severe harm to civilians during and after the conflicts and generate significant long-term health and safety effects on the civilian population.

It's the case of:

- **Anti-Personnel Landmines:** *The ICRC (International Committee of the Red Cross) and ICBL (International Campaign to Ban Landmines) now estimate that between 3,000 and 4,000 people are killed, mutilated or injured every year by antipersonnel mines. For most of the countries concerned, the direct costs related to the victims are usually too heavy to assume, whether in terms of care, rehabilitation, equipment, or even more social and professional reintegration. Among the most severely affected countries, Afghanistan, Angola and Cambodia top the list. The proliferation of anti-personnel mines is, moreover, a real obstacle to the development of the most affected countries. The persistence of large areas infested with mines is an obstacle to a return to a normal economic and social life. Mining reduces arable land and strikes farm workers who are very exposed to danger. It deeply disorganizes the economy by restricting the possibilities of communication and exchange. The proliferation of anti-personnel mines is thus an aggravating factor of underdevelopment.¹.*

<https://www.diplomatie.gouv.fr/fr/politique-etrangere-de-la-france/securite-desarmement-et-non-prolifération/désarmement-et-non-prolifération/l-élimination-des-mines-antipersonnel/>

- **Cluster Munitions:** according to the Oslo Convention, a cluster munition is "a conventional munition designed to release or release explosive submunitions, each of which weighs less than 20 kilograms". *These munitions are dropped by air or fired by land. These are attack weapons, designed to neutralize a combat zone. Nevertheless, they are inaccurate and inevitably affect civilian areas. According to Handicap International, 98% of the victims identified are civilians and nearly one third are children. In addition, 5 to 40% of cluster submunitions do not explode on impact, and therefore become landmines that continue to threaten populations long after conflicts end. At the slightest touch, they mutilate, burn badly or kill².*

<https://www.diplomatie.gouv.fr/fr/politique-etrangere-de-la-france/securite-desarmement-et-non-prolifération/désarmement-et-non-prolifération/l-élimination-des-armes-a-sous-munitions/>

STANWAHR has therefore put in place a controversial arms exclusion policy on Anti-Personnel Landmines and Cluster Munitions. With this initiative, we follow the signature by France:

- of the 1997 Ottawa Convention on the Prohibition of the use, stockpiling, production and transfer of anti-personnel landmines and on their destruction

¹ France Diplomatie : L'élimination des mines antipersonnel

² Amnesty International ; Handicap International



- of the 2008 Oslo Convention banning the use, manufacture, stockpiling and transfer of cluster munitions; the treaty does not prohibit so-called "intelligent" ASMs that have electronic mechanisms of anti-deactivation or self-destruction

Definition of involvement

- A company involved in the development, production, use, maintenance, offering for sale, distribution, import or export, storage or transport of cluster munitions and their key elements;
- A company holding 50% or more of a company as defined above. In addition, information on participating holding companies of 20% or more in a company falling under the above point is included in the analysis reports.

Perimeter

The exclusion of controversial armaments is applicable to all investments of the SICAV INDEPENDANCE ET EXPANSION managed by STANWAHR.

Source of information and update:

STANWAHR uses the services of an extra-financial research agency, Ethifinance, which provides a list of listed and unlisted companies involved in controversial weapons; this list is updated annually.

Implementation

The list of companies involved is communicated annually by our partner to our Risk and Compliance Officer who verifies that no new investment is made in a company on the list. In the event that a company in which we invest is found during an update on the list of companies involved, STANWAHR is committed to sell the stock as soon as possible.

Conscious of the importance of the extra-financial dimension (Environmental, Social / Societal, Governance) in the development and sustainable growth of companies, STANWAHR takes into account ESG criteria in the fundamental analysis of the companies in the portfolios. Each year, the composition of the INDEPENDANCE ET EXPANSION portfolios is reviewed and a report under the ESG criteria is prepared by Ethifinance. Ethifinance validates in its report that no investment has been made in companies on the list during the past year. This report is published on the INDEPENDENCE AND EXPANSION website:

<http://www.independance-et-expansion.com/fr/nos-engagements>

Tobacco exclusion policy

STANWAHR excludes investments in tobacco companies.

STANWAHR formalized this commitment in 2019 by becoming a signatory of the Tobacco-Free Finance Pledge.



The Tobacco-Free Finance Pledge (TFFP) is an initiative from the Australian organization Tobacco Free Portfolios. It was developed in collaboration with the Finance Branch of the United Nations Environment Program (UNEP), its Principles for Sustainable Insurance (PSI), BNP Paribas, AMP Capital, AXA, Natixis and the international network Principles for Responsible Investment (PRI). The TFFP recognizes the United Nations Sustainable Development Goals (SDGs), particularly those on health and partnerships, and the World Health Organization (WHO) Framework Convention on Tobacco Control.

The initiative brings together more than 130 signatories and public and private supporters. They represent a total of \$ 6.8 trillion in assets under management, \$ 1.9 trillion in business loan portfolios, and \$ 180 billion in gross premiums.

The objectives of the Tobacco-Free Finance Pledge are to:

- Highlight the leadership of financial institutions that have implemented tobacco-free finance policies and encourage others to follow suit.
- Encourage the finance sector to play an active role in addressing global priorities, as outlined in the United Nations' Sustainable Development Goals, including SDG 3 Health and Well-Being and SDG 17 Partnerships for the Goals, in addition to the World Health Organization Framework Convention on Tobacco Control.
- Raise awareness among financial institutions of the essential role the finance sector must play to assist effective tobacco control and to ensure a tobacco-free world.
- De-normalise financial and corporate associations with tobacco companies.
- Encourage financial institutions to reflect on and reconsider their business relationships with the tobacco industry in light of the global tobacco epidemic.
- Encourage the transition towards tobacco-free finance policies.
- Prioritise tobacco on the corporate agenda as a product and industry distinct from any other with no safe level of use and no opportunity for effective engagement.

The list of signatories that includes STANWAHR is available on the website of the Finance branch of the United Nations Environment Program (UNEP):

<https://www.unepfi.org/psi/tobacco-free-finance-signatories/>

Perimeter

The exclusion of tobacco is applicable to all investments of the SICAV INDEPENDANCE ET EXPANSION managed by STANWAHR.



Source of information and update:

STANWAHR uses data provided by the NGO Tobacco Free Portfolios, which lists listed and unlisted companies involved in tobacco.

Implementation

STANWAHR Risk and Compliance Officer verifies that no new investment is made in a company on the list of companies involved in tobacco published by Tobacco Free Portfolios. In the event that a company in which we invest is found during an update on the list of companies involved, STANWAHR is committed to sell the stock as soon as possible.



Coal exclusion policy

STANWAHR is committed to the theme of energy transition and decided in 2019 to exclude from its investments companies:

- active in coal mining,
- that have a project to develop new coal plants,
- whose energy production is based on coal for a share of more than 10%, and don't have a clear plan to replace all energy production based on coal by 2030.

STANWAHR supports the 2015 Paris Agreement on the Combat Against Climate Change, which aims to contain by 2100 global warming "well below 2 ° C compared to pre-industrial levels" and if possible to aim at " continue efforts to limit the temperature rise to 1.5 ° C "(Article 2).

According to the Energy Technology Perspectives of the International Energy Agency (IEA), "The continued increase in coal consumption counteracts the reduction in emissions resulting from recent advances in the deployment of renewable energy." The coal sector is responsible for 44% of global greenhouse gas emissions. It is necessary to reduce them drastically to limit global warming and to respect the Paris Agreement.

Perimeter

The exclusion of tobacco is applicable to all investments of the SICAV INDEPENDANCE ET EXPANSION managed by STANWAHR.

Source of information and update:

STANWAHR uses data provided by Coal Exit, which provides a list of listed and unlisted companies involved in coal mining and production.

Implementation

STANWAHR Risk and Compliance Officer verifies that no new investment is made in a company on the list of companies involved in coal published by Coal Exit. In the event that a company in which we invest is found during an update on the list of companies involved, STANWAHR is committed to sell the stock as soon as possible.

As of 2018/12/31, one company of the portfolio of the SICAV INDEPENDANCE ET EXPANSION managed by STANWAHR produces a part of its energy from coal. This is Albioma, a renewable energy producer. Albioma is active in the sectors of recovery of the biomass and solar photovoltaic, mainly in Metropolitan France and Overseas France. This company is actively involved in the energy transition towards renewable energy with the objective of replacing coal with biomass in power plants that value bagasse by 2023. The company will then produce 100% renewable energy. The company thus proves its total commitment in the theme of the energy transition supported by STANWAHR.