



SAY ON CLIMATE Assessment

France



2025

Transparency rating

43%

of alignment with FIR
recommendations



ACCELERATE
CLIMATE
TRANSITION

PERFORMANCE SCORE

53 %

NARRATIVE SCORE

A B C D E

TREND SCORE



Altarea aims **to achieve carbon neutrality for the property-related part of its activities by 2030, which represents less than 5% of its overall emissions.** With regard to reference scenarios, the company lacks transparency on the trajectories it is following. GHG emission reduction targets are not **clearly defined in the short and long term, but are defined in the medium term for 2030 and 2035, broken down by business segment and scope,** but are not scientifically validated and imply an increase in Scope 3 emissions between 2024 and 2030. The actions are detailed and the contribution to decarbonisation by major type of action is given, but they could be **further quantified.** On the remuneration front, **climate criteria are included in the non-financial variable** for management, but remain marginal compared to financial objectives, and the **thresholds to be achieved are not made public.** Finally, despite the areas for improvement identified, we welcome the introduction of a Say on Climate policy from 2023.

As early as 2021, the **French Forum for Responsible Investment (FIR)** has called for the widespread adoption of stringent Say on Climate (SOC). After a first edition on 2022, the FIR signed again [an agreement with 48 French and European signatories](#), encouraging the development of SOC. Meanwhile, in 2022, FIR began analyzing the climate plans of French companies that submit them to shareholder vote. After joining forces in 2023, **FIR and ADEME** extended their partnership in 2024 by teaming up **with Ethos and the World Benchmarking Alliance**. Again this year, these players will be working together to study the climate plans of **European companies** submitted to a consultative vote by shareholders at their general meetings in 2025.

In 2022, FIR had published [fact sheets](#) assessing the extent to which French companies' climate strategies were in line with **its recommendations**. In 2023, as part of the partnership with ADEME, these analysis reports will be enriched **with the ACT assessment tool** to measure the contribution of corporate strategies and actions to the mitigation objectives of the Paris Agreement.

Analyses will be published as they become available, ahead of their annual general meetings.

As in previous years, FIR wishes to salute the efforts of companies that contribute to improving shareholder dialogue, and encourages them to reiterate the Say on Climate exercise annually.

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Altarea

43%

alignment with FIR
recommendations

Ambition Net Zero 2050

Ambition to achieve net zero emissions from real estate activities by 2030

- ▷ Ambition targets only real estate activities (less than 5% of overall emissions)
- ▷ No information on the share of offsetting/reduction

Reference scenario(s) used

The company refers to the SBTi contraction method (+/-6%) relative to a 1.5°C level for its 2030 global emissions reduction target; refers to alignment with RE2020 for its promotion activity target and with the tertiary decree for its land activity

- ▷ The reference scenarios used could be clearer and more precise (in particular by specifying the targeted warming temperatures)
- ▷ The company no longer refers to a commitment to set science-based targets in order to comply with the goal of keeping warming "below 1.5°C" as in 2023

Current GHG emissions (2024 vs 2023)

15% reduction in group emissions in 2024 compared to 2023 for scopes 1, 2, and 3* (volume effect: -5% and rate effect (carbon intensity per surface area): -11%); 50% reduction across all three scopes since 2019

2024 vs. 2023

SCOPE 1	SCOPE 2 (market based)	SCOPE 2 (location based)	SCOPE 3
1931 tCO ₂ e (vs 1739) +11%	859 tCO ₂ e (vs 1257) -31%	1297 tCO ₂ e (vs 1502)	772 819 tCO ₂ e (vs 918 033) -16%

by business segment:

- Real estate development: 740,984 tons of CO₂e; 1,155 kgCO₂e/m²
- Real estate and corporate: 36,000 tons of CO₂e; real estate: 5.6 kg CO₂e/m²
- New activities: 1,000 tons of CO₂e

Short-term GHG emissions reduction target (before 2030)

- ▷ Short-term targets are not specified.

Medium-term GHG emissions reduction target (between 2030 and 2040)

2030 targets (vs. 2019):

Scope 1: between -36% and -42% in absolute terms

Scope 2: between -39% and -45% in absolute terms

Scope 3: between -39% and -46% in absolute terms, with the ambition of achieving carbon neutrality for land use by 2030

Development activity: reduce intensity (in kgCO₂e/m²) by 36% to 42%

Real estate activity: reduce intensity per surface area (in kgCO₂e/m²) by 29% to 36%

Overall: achieve between 850 and 950 thousand tCO₂e (reduction of 39% to 46% compared to 2019)

2035 targets:

Promotional activity: 50% reduction in GHG emissions from promotional activities in terms of surface area intensity (reference year: 2019)

- ▷ Targets not yet scientifically validated
- ▷ The company expects an increase in its absolute emissions between 2024 and 2030 for its Scope 3

Long-term GHG emissions reduction target (after 2040)

- ▷ Long-term targets are not specified

Action plan measures

Detailed action plan covering two of the group's business areas: real estate development (construction and use) and real estate, with slightly less focus on the corporate side

Retail: 7 levers for action: integrate climate requirements from the design phase, update contracts, remove inefficient sprinkler systems, turn off illuminated signs, standardize LED lighting, smart lighting, efficient insulation and heating systems

Real estate development: improve building compactness, source materials, design, and influence the consumption habits of future occupants.

Corporate: reduction of transport-related emissions (company vehicles): 25% reduction in gasoline-powered vehicles and elimination of diesel-powered vehicles, and reduction of energy consumption by head offices: 30% reduction in consumption through better management since 2019

- ▷ No information on the time frame for the action plan
- ▷ The group calculates the contribution of each major type of action to decarbonization, but the measures taken could be more detailed and quantified to provide a better understanding of each one's contribution to the reduction targets set

CAPEX / OPEX investment alignment

- ▷ No information on CAPEX quantified by scope
- ▷ 60.8% (vs. 45.5% in 2023) of investments are aligned with the taxonomy and 94.1% of eligible CAPEX

Remuneration

Variable remuneration for Altarea and Altareit management for 2024: No annual variable fee in accordance with the management's wish to renounce ab initio in 2024 any variable remuneration that may be due for that financial year

Variable remuneration for Altarea's management for 2025: Management is again waiving part of its fixed and variable remuneration. However, part of the variable remuneration (maximum of €350k excluding tax) will be linked to quantitative non-financial criteria based on the achievement of climate-related objectives: 50% of the non-financial portion will be conditional on the implementation of the Group's decarbonization strategy: 25% will be conditional on the environmental sustainability of the Group's activities (relating to the share of revenue aligned with the taxonomy) and 25% conditional on the Group's carbon performance (progressive amount based on the achievement of thresholds relating to the Group's greenhouse gas emissions in 2025 in relation to its activities (in g of CO₂/€ of consolidated revenue))

- ▷ No multi-year variable
- ▷ The non-financial variable portion (max. €350k) is significantly lower than the financial variable portion (max. €1,350k); the maximum non-financial portion accounts for only 21% of the maximum variable compensation.
- ▷ Lack of consistency with the targets set in terms of surface area intensity (CO₂/m²) or in absolute terms
- ▷ The thresholds to be achieved are not public

Variable remuneration for Altareit management for 2025:** 50% of the variable component is based on non-financial criteria related to climate issues: implementation of the decarbonization strategy in promotional activities

- ▷ Simply qualitative objective
- ▷ **Variable remuneration for managers + profit sharing:** includes climate-related criteria
- ▷ What about the criteria and their weighting in managers' variable remuneration?

* Increase in Scope 1 emissions compared to 2023: +11%.

** Listed subsidiary 99% owned by Altarea

Annual consultative vote on implementation

No commitment to an annual consultation on implementation, but presentation of a Say on Climate since 2023

Consultative vote on strategy every three years

No annual consultation on implementation

Caption:
○ Suggestions for improvement
▷ Failure to obtain all the points

PERFORMANCE SCORE

53%

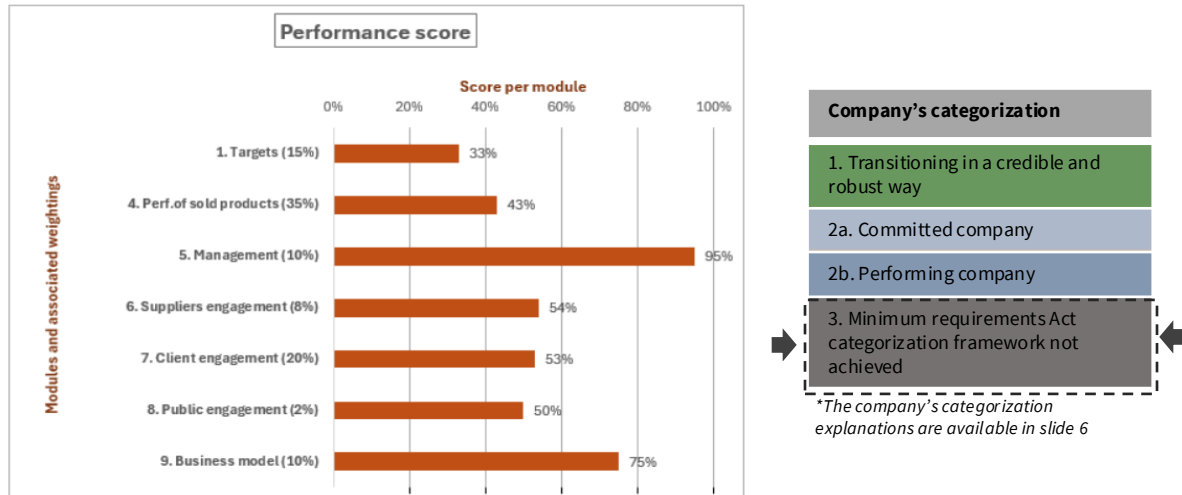
NARRATIVE SCORE

A **B** C D E

TREND SCORE

=

ACT Property Developer Methodology



Transition plan's assessment

Performance score

1.Targets : Altarea has set a reduction target of 36% to 42% in emission intensity per surface area for its Property Development segment. However, Altarea should define and communicate differentiated targets by product type, emission source (energy and materials), and project type (new construction, rehabilitation), and should also integrate scope 3 emissions (including private area energy consumption).

4. Performance of sold products : Altarea reports a 51% reduction in absolute GHG emissions between 2019 and 2024. The Group has deployed significant resources to ensure and demonstrate that its projects are aligned with the EU Taxonomy. This strategy has resulted in a significant increase in the alignment rate of revenue in 2024 (68.6% vs. 48.1% in 2023). The company could further improve transparency by publishing more information on its locked-in emissions.

5. Management : Climate strategy governance, integrated within the CSR approach, is mature. The climate strategy is overseen by a member of the Executive Committee, who is also responsible for the CSR Department. This Department centralizes expertise and monitoring while coordinating the teams. The CSR approach is defined and monitored by the Management Board and the Supervisory Board.

The strategic roadmap includes a strong climate dimension, encompassing the assessment of risks related to climate change as well as the development of a transition plan aligned with the 2035 targets. In addition, climate-related objectives have now been incorporated into the remuneration of all employees and executives.

6/7. Value chain engagement : Itarea has implemented a number of actions with both its suppliers and its clients to address mitigation and adaptation challenges. In particular, the company has introduced specific environmental clauses in its calls for tenders (low-carbon products, A+ labels, etc.) with suppliers, and has carried out preliminary market studies as well as real estate project planning that includes environmental and quality labels and certifications for its clients. However, no emission reduction targets are currently imposed on value chain partners, nor are they required to provide public reporting on their emissions.

8. Public engagement : The company could strengthen its positioning by formalizing a public engagement policy that clearly sets out the Group's stance on climate issues.

9. Business model : Altarea has undertaken significant initiatives to improve the energy performance of its buildings. The company is also developing and producing photovoltaic energy, a rapidly growing segment of its business, in order to support municipalities, companies, the agricultural sector, and landowners in their transition, while maximizing the value of their assets.

Transition plan's consistency (narrative score):

- The overall assessment leads to the attribution of a narrative score of **B**.

Trend score : Altarea's transition plan appears to be moving in a positive direction. The company could have a significant impact on reducing its scope 3 emissions. A "=" factor has been applied to the trend score, taking into account the current uncertainty of the company's capacity to achieve its emissions reduction targets.

Areas of improvements :

- The company could set absolute or intensity-based Scope 3 emission reduction targets, expressed relative to a physical unit, and establish medium- and long-term reduction objectives beyond 2030. OVH could also provide more detail on the expected impacts of each action lever in terms of energy consumption and emissions.
- It is recommended to strengthen the materiality analysis on decarbonization and climate mitigation issues, by considering a wide range of low-carbon transition risks and assessing them against transition scenarios aligned with the Paris Agreement.

SAY ON CLIMATE 2025 evaluation grid

based on follow-up to FIR recommendations

	●	●	●
Ambition net zero 2050	If the ambition of contributing to carbon neutrality by 2050 is declared and clear explanations are given on how to achieve this neutrality The level of negative emissions is limited	The ambition to contribute to carbon neutrality by 2050 is declared and the explanations on how to achieve this neutrality are clear. The level of negative emissions is high	A declared ambition, but very little clarity on how the company intends to achieve carbon neutrality (no long-term reduction targets, targets set are not very credible, heavy reliance on offsetting, etc.) or no declared ambition to be carbon neutral by 2050
Reference scenarios used	The company positions its climate strategy in relation to a 1.5°C warming scenario for all scopes	The company uses a reference scenario limiting warming to between 2°C and 1.5°C, or 1.5°C for only part of its scope	No reference scenario explicitly mentioned or scenario(s) not used to define the strategy
Current GHG emissions	Disclosure of absolute greenhouse gas emissions; breakdown by scope; downward trend in past emissions (over at least 3 years) in line with company targets	Insufficiently detailed disclosure of absolute greenhouse gas emissions and/or lack of substantiated justification for the absolute increase in emissions over the last 3 years	No public data or little or no justification for the upward trend in emissions intensity and absolute values
Short-term GHG emissions reduction target	If the quantified emission reduction targets before 2030, expressed at least in absolute terms, cover the 3 scopes and are set in relation to the company's 1.5°C alignment trajectory. This trajectory has been scientifically validated.	If the quantified emission reduction targets before 2030 do not cover the majority of the company's activities, or if these targets cover all activities but are on a trajectory of between 2°C and 1.5°C	No quantified target for reducing emissions in the short term, or targets that are not very ambitious in the short term (reference year too far in the past, no absolute reduction, not scientifically validated, etc.)
Medium-term GHG emissions reduction target	If the quantified emission reduction targets between 2030 and 2040, expressed at least in absolute terms, cover the 3 scopes and respect the alignment with a 1.5°C scenario. This trajectory has been scientifically validated	If the quantified emissions reduction targets between 2030 and 2040 do not cover the majority of the company's activities, or if these targets cover all activities but are on a trajectory of between 2°C and 1.5°C	No quantified target for reducing emissions in the medium term, or targets that are not very ambitious in the medium term (reference year too far in the past, no absolute reduction, not scientifically validated, etc.)
Long-term GHG emissions reduction target	If the quantified emission reduction targets for 2050 or earlier, expressed at least in absolute terms, cover the 3 scopes and are set in relation to the company's 1.5°C alignment trajectory. This trajectory has been scientifically validated	If the quantified emission reduction targets for 2050 or earlier do not cover the majority of the company's activities, or if these targets cover all activities but are on a trajectory of between 2°C and 1.5°C	No quantified target for reducing emissions in the long term, or targets that are not very ambitious in the long term (reference year too far in the past, no absolute reduction, not scientifically validated, etc.)
Action plan measures	Detailed measures for each scope of the company with a sufficient level of detail, including short- and medium-term figures, to enable the alignment of this plan with the objectives set to be assessed.	Detailed measures for each scope of the company, but insufficient detail to assess the level of alignment with the objectives set (lack of quantified measures in particular)	Measures with little or no detail
Investment alignment (OPEX / CAPEX)	Details the proportion of investments (OPEX and CAPEX) that contribute to meeting short- and medium-term targets, and explains how these investments enable the targets to be met	The information provided on the contribution of investments to the achievement of objectives does not allow an understanding of how the company achieves the objectives set	No investments contributing to the achievement of explicit objectives
Remuneration	All variable parts of the remuneration of corporate officers include at least one criterion that assesses the achievement of greenhouse gas emission reduction targets. The % of remuneration determined by this criterion is published; it represents a significant proportion (10% or more)	At least part of the variable part of the remuneration of corporate officers is covered by a non-diluted criterion for reducing greenhouse gas emissions in line with the reduction trajectory defined by the company	The criterion included in the remuneration of corporate officers relating to the reduction in greenhouse gas emissions is diluted, or does not follow the reduction trajectory defined by the company. or No criteria relating to the reduction of greenhouse gas emissions are included in executive remuneration
Annual consultation on implementation	The company undertakes to consult shareholders annually on the implementation of its climate change strategy	The company is committed to consult shareholders on the implementation of its climate strategy over the coming years	The company does not undertake to consult shareholders on the implementation of its climate strategy
Consultation on strategy every three years	The company undertakes to consult shareholders on its climate strategy at least every three years	The company undertakes to consult shareholders on its climate strategy over the coming years	The company makes no commitment to consult shareholders on its climate strategy

SAY ON CLIMATE FR - 2025

→ IT'S TIME TO ACT

WHAT IS ACT ?

A joint voluntary initiative of the UNFCCC secretariat Global Climate Agenda.

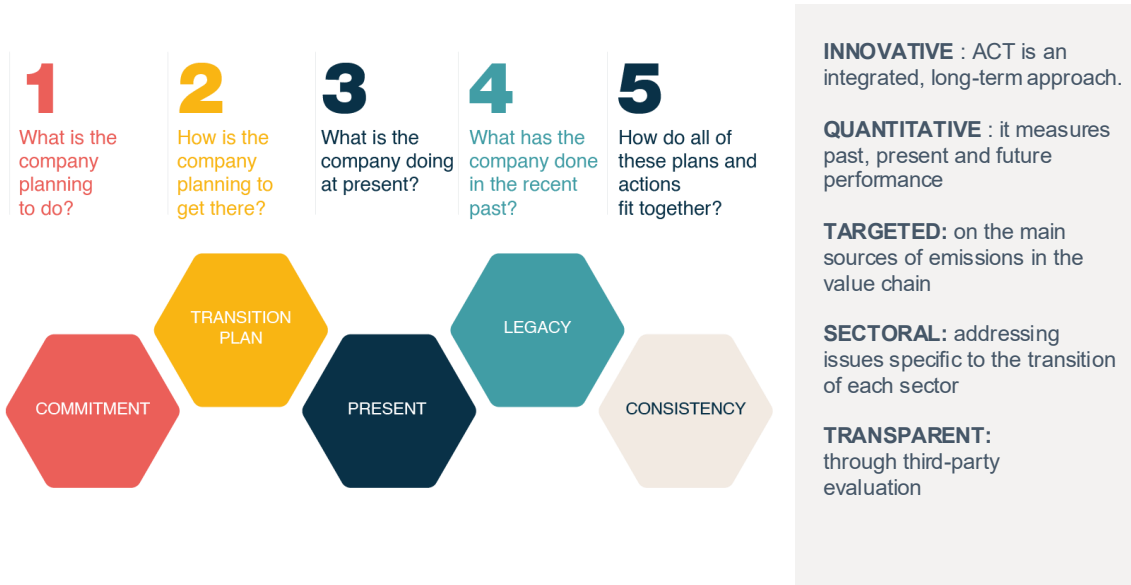
WHY ACT ?

Drive climate action by companies and align their strategies with low-carbon pathways.

HOW DOES ACT WORK ?

ACT provides sectoral methodologies as an accountability framework to assess how companies' strategies and actions contribute to the Paris mitigation goals.

FRAMEWORK



ACT ASSESSMENT

For what purpose?

Credibly measure the contribution to the net-zero objective in relation to sectoral low-carbon trajectories.

For whom?

Companies with science-based objectives and/or a transition plan ready for assessment



ACT assessment categorization

The purpose of this categorization is to leverage on the ACT assessment methodologies, that provide an in-depth assessment of strengths and weaknesses of company’s transition plans and propose a categorization framework providing a clear signal on a company’s situation. It is willing to address the following question “what is a good ACT score?”.

All the information on this paper is to be found [here](#).

The categorization framework proposed is the following:

- 1. Companies transitioning in a credible and robust way;
- 2. Companies partially satisfactory on one or two of the following aspects:
 - a. Companies “committed” that are ambitious enough but have not yet demonstrated the performance;
 - b. Companies “performing” that have demonstrated good GHG trajectory at the moment but haven’t provide aligned ambitions.
- 3. Companies **not** transitioning in an enough credible and robust way.

The categorization of companies proposed in this paper is based on thresholds on the global performance score, complemented by safeguards on relevant sub-module performance score levels, on narrative and on trend scores. The categorization framework is sum-up in the table below :

Category	1. Transitioning in a credible and robust way	2a. Committed	2b. Performing	3. Not transitioning in a credible and robust way ²
Criteria application	Criteria blocks are cumulative			Criteria blocks are alternative ³
Global performance score	≥12/20	No threshold.		Global < 12/20 AND
Module performance scores	Module 1 ≥ 75% Modules 2+4 ≥ 60% <i>Where relevant:</i> Modules 6+7≥ 50%	Module 1 ≥ 75%	Modules 2+4 ≥ 60%	Module 1 < 75% AND Modules 2+4 < 60%
Narrative score	≥ C global AND ≥ C on consistency and credibility AND reputation			< C global OR <C on consistency and credibility OR reputation
Trend score	= or +			-

ACT methodology

Property Developer

The full ACT methodology for the Generic sector can be found on our website. The detailed assessment is summarized in a score based on three criteria: performance, overall consistency and trend. It takes the following form:

- **Performance:** number between 1 and 20
- **Evaluation (consistency):** letter between A and E
- Trend: + (improvement), - (deterioration), = (stable)

The specifics of the performance score for the Property Development sector are set out below: The performance score is heavily dependent on the performance module (35% weighting), since most of the sector's decarbonization challenge stems from the need to improve the bottom-line performance of real estate assets under management.

Score de performance

Module	Indicator
1.Targets	1.1 Alignment of owned buildings reduction targets
	1.2 Alignment of new buildings delivered (use phase) reduction targets
	1.3 Alignment of renovated buildings (use phase) reduction targets
	1.4 Alignment of new buildings (materials) reduction targets
	1.5 Time horizon of targets
	1.6 Historic target ambition and company performance
4.Sold product performance	4.1 Alignment of carbon performance trend for new buildings (use phase)
	4.2 Share of low carbon buildings
	4.3 Renovated subject to thermal renovation share
	4.4 Emissions lock-in
5.Management	5.1 Oversight of climate change issues
	5.2 Climate change oversight capability
	5.3 Low carbon transition plan
	5.4 Climate change management incentives
	5.5 Climate change scenario testing
6.Suppliers	6.1 Strategy to influence suppliers to reduce their GHG emissions
	6.2 Activities to influence suppliers to reduce their GHG emissions
7.Clients	7.1 Strategy to influence clients to reduce their GHG emissions
	7.2 Activities to influence suppliers to reduce their GHG emissions
8.Engagement policy	8.1 Company policy on engagement with trade associations
	8.3 Position on significant climate policies
9.Business model	9.1 Integration of the low carbon economy in current and future business models

Narrative scoring

1. Business model and strategy
2. Consistency and credibility
3. Reputation
4. Risks

Trend scoring

1. Probability of emissions' evolution
2. Evolution of business model and strategy

Disclaimer:

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