

• **ANTI-CORRUPTION  
POLICY**

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- **1. OSTRUM ASSET  
MANAGEMENT'S COMMITMENT**

Corruption is fraudulent, unethical behaviour that is subject to severe criminal and administrative penalties. Violations of anti-corruption regulations are, by definition, serious and may damage Ostrum Asset Management's reputation.

Ostrum Asset Management is committed to doing business with integrity in order to protect itself from all forms of influence peddling and corruption, including bribery and acceptance of bribes in business dealings and the corruption of public officials. For the purposes of this policy, the term "corruption" includes giving bribes and paying kickbacks to public officials or any other person. Bribery is the practice of offering items of value, cash payments, charitable contributions, loans, travel expenses, expensive gifts, invitations to expensive events, or promises of employment to either the corrupt individual or one of their immediate family members in order to inappropriately influence a business or administrative decision.

To protect against such prohibited actions, Ostrum Asset Management has implemented an anti-corruption system to raise awareness and promote best practices that contribute to the prevention of corruption.

All Ostrum Asset Management employees must understand the importance of this system, with which they are required to comply in performing their duties, in accordance with Ostrum Asset Management's Internal Regulations and Code of Ethics.

Ostrum Asset Management's Senior Management team is responsible for preventing corruption within Ostrum Asset Management.

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- **2. ANTI-CORRUPTION  
REGULATORY FRAMEWORK**

Ostrum Asset Management complies with the “Sapin II” Law of 9 December 2016 on transparency, the prevention of corruption and economic modernisation, which requires it, as an obliged entity, to implement measures to detect and prevent corruption in France and abroad.

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## ● 3. PROHIBITED ACTIVITIES

Ostrum Asset Management, its employees, officers and directors must not engage in prohibited activities.

Prohibited activities include offering, promising or giving (or authorising others to offer or accept) any advantage, cash payment or item of value, either directly or indirectly (such as through a business partner or any other person), to a public official and, more generally, to any person, in order to:

- influence a public or business decision,
- lead such individual to perform his or her duties in a dishonest or inappropriate manner,
- obtain an undue advantage.

Pursuant to the provisions of Ostrum Asset Management's Internal Regulations and Code of Ethics, Ostrum Asset Management employees are also prohibited from soliciting or accepting an undue advantage in exchange for taking or not taking action under their responsibility.

Facilitation payments, which are payments made to a public official to facilitate, speed up or ensure the enforcement of a public decision, are prohibited regardless of the amount thereof.



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- **4. ACTIVITIES WITH AN INCREASED RISK OF CORRUPTION**

Certain activities may have an increased risk of corruption. Ostrum Asset Management has taken due diligence measures concerning the following practices in particular:

- gifts and invitations to events,
- travel, accommodations and related expenses,
- conferences and events,
- charitable contributions/donations, sponsorship and patronage,
- suppliers and other third parties,
- dealings with public officials,
- recruitment practices,
- mergers, acquisitions and joint ventures,
- accounting,
- representation of interests.

In case of one or more alerts, Ostrum Asset Management must ensure that there is a legitimate business justification, assess the associated risk level and respond accordingly.

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## ● 5. COMPLIANCE SYSTEM

Ostrum Asset Management has put in place a system to promote and ensure compliance with anti-corruption regulations.

To this end, it has implemented risk prevention measures based on the following:

- corruption risk mapping,
- internal policies, procedures and standards,
- training and awareness activities,
- an anti-corruption policy for third parties.

Ostrum Asset Management performs regular controls to ensure that its activities and practices comply with anti-corruption regulations. Controls are enhanced when an increased risk of corruption is identified through risk mapping. Their aim is to identify potential bribery or other forms of corruption.

Ostrum Asset Management has set up a whistleblowing procedure to gather alerts from employees about the existence of behaviour or situations in breach of its anti-corruption policy.

## ADDITIONAL NOTES

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Under Ostrum Asset Management's social responsibility policy, and in accordance with the treaties signed by the French government, the funds directly managed by Ostrum Asset Management do not invest in any company that manufactures, sells or stocks anti-personnel mines and cluster bombs.



Ostrum Asset Management

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