

• **POLICY FOR THE SELECTION
OF INTERMEDIARIES –
COUNTERPARTIES AND
ORDER EXECUTION**

Date came into force: July 16, 2019
Date updated: December 14, 2023

CONTENTS

1.	SCOPE FOR APPLICATION	3
2.	DETAILED DESCRIPTION	5
2.1.	Background	6
2.2.	Principle of best selection	7
2.3.	Basic principles applied by Ostrum Asset Management	8
2.4.	Intermediary selection policy	9
2.5.	Execution policy	11
2.6.	Regulatory information regarding MiFID II	13
2.7.	Review of effectiveness of set-up	14
2.8.	Appendix 1: INFORMATION ON OSTRUM ASSET MANAGEMENT ORDERS	15
2.9.	Appendix 2: Natixis Tradex Solutions – selection criteria	19
2.10.	Appendix 3: glossary	21

The background is a solid teal color with several concentric circles of varying shades of teal and dark teal, creating a ripple effect. The circles are centered on the left side of the page and expand towards the right.

- **1. SCOPE FOR APPLICATION**

This policy applies to Ostrum Asset Management.

Client categorization: this policy applies to Ostrum Asset Management's professional and non-professional clients as defined by the Markets in Financial Instruments Directive (MiFID) II.

Status and framework applicable to asset management companies: Ostrum Asset Management is an asset management company. Ostrum Asset Management primarily conducts collective management operations, discretionary asset management and reception and transmission of orders (RTO) for third parties.

Ostrum Asset Management is governed by MiFID II as regards "**Best execution and best selection**" for the activity of collective management and management under mandate.

The background is a solid teal color with several concentric circles of varying shades of teal and white, creating a ripple effect. The circles are centered on the left side of the page and expand outwards towards the right.

- **2. DETAILED DESCRIPTION**

2.1. BACKGROUND

European Directive 2014/65/EU (MiFID II) came into force on January 3, 2018 and introduces changes in terms of **investor protection**.

Under MiFID II and the French Financial Markets Authority's (*Autorité des Marchés Financiers*) General Regulation¹, **the obligation to obtain the best possible result** for clients during order execution **was bolstered**. Asset management companies must fulfil their obligation to take all "**reasonable**" **measures** to achieve the best possible result for their clients.

In accordance with requirements set out in MiFID II, this document is aimed at describing the scope and conditions for application for the **best selection and best execution** policy implemented by Ostrum Asset Management to meet its obligation to **achieve the best possible results**.

The asset management company regularly monitors the effectiveness of its policy and in particular the quality of execution for entities selected as part of this policy.

¹ Article 321-114: When they transmit for execution orders resulting from their decisions to trade financial instruments on behalf of UCITS that they manage to other entities, asset management companies shall comply with the obligation referred to in Article 321-100 to act in the best interest of the UCITS that they manage.

2.2. PRINCIPLE OF BEST SELECTION

The asset management company has an obligation to act in the best interests of the UCI²³ as part of its collective asset management business. The principle of **Best selection⁴ of intermediaries** enables the asset management company to achieve the best possible result for its clients when it transmits orders on behalf of portfolios it manages to duly approved intermediaries.

The “best selection” obligation also applies to asset management companies as part of the provision of portfolio management services for third parties (discretionary management) and as part of the provision of RTO services. When the asset management company sends the orders received from clients or that result from management decisions to a third party for execution, the asset management company must take all reasonable measures to obtain the best possible results.

A substantial portion of orders is entrusted to Natixis Tradex Solutions as part of its intermediation business for execution by a broker selected⁵ by Natixis Tradex Solutions. By way of exception, some transactions are executed directly by Ostrum Asset Management due to their specific features.

In connection with Ostrum Asset Management’s takeover of the Structured Management activities of Natixis Investment Managers International on January 1, 2023, a team of manager-traders authorized to place orders on the market has joined Ostrum Asset Management. This team works with counterparties on the list of authorized counterparties, which is approved by Ostrum Asset Management. Details of this structure are provided in Section 2.4.

In accordance with the Markets in Financial Instruments Directive (MiFID) II and provisions transposed into the AMF General Regulation, this policy outlines Ostrum Asset Management’s overall set-up and the basic principles it applies broadly speaking for the selection of intermediaries, as well as execution of orders placed directly as part of its collective asset management operations.

² In terms of AIF, section 2 of chapter IV of Title I bis of the AMF General Regulation refers to articles 25 to 29 of Commission Delegated Regulation No. 23/2013, which came into effect before MiFID II and reflect concerns on best execution.

³ AMF General Regulation 321-114: When they transmit for execution orders resulting from their decisions to trade financial instruments on behalf of UCITS that they manage to other entities, asset management companies shall comply with the obligation referred to in Article 321-100 to act in the best interest of the UCITS that they manage.

⁴ Ostrum Asset Management has set up an accreditation process to select intermediaries to which orders are sent for execution.

⁵ Natixis Tradex Solutions selects intermediaries on the basis of costs and quality of order handling from a list of counterparties/brokers authorized by Ostrum Asset Management (following the accreditation process). Counterparties in charge of execution comply with the “Best Execution” principle set out in MiFID II.

2.3. BASIC PRINCIPLES APPLIED BY OSTRUM ASSET MANAGEMENT

As an asset management professional, Ostrum Asset Management has a responsibility to conduct its business entirely independently and in the exclusive interests of its clients.

In accordance with the Markets in Financial Instruments Directive II, Ostrum Asset Management has set out and abides by the following principles :

- Respect for market integrity, transparency and security ;
- Compliance with applicable regulation in this area as well as general rules of good conduct defined by the profession ;
- Putting the client's best interests first.

This policy applies when the asset management company manages portfolios directly, apart from portfolios where the company delegates management to a third party.

This policy is reviewed on a yearly basis and is subject to change without prior notice at any time.

This document is also available on request from Client Services at Ostrum Asset Management by email to the following address: contact@ostrum.com or by post by contacting:

Ostrum Asset Management
Client Experience department
43, Avenue Pierre Mendès-France
CS 41432
75648 Paris Cedex 13

This policy applies to Ostrum Asset Management's professional and non-professional clients as defined by MiFID II.

2.4. INTERMEDIARY SELECTION POLICY

Pursuant to the Markets in Financial Instruments Directive (MiFID) II, Ostrum Asset Management has set up an overall organization with a view to securing the **best possible result for its clients** during the order transmission and execution process.

Ostrum Asset Management has opted for the “professional client” status in its dealings with intermediaries and counterparties.

Intermediary accreditation process

The **best selection** process is based on a list of authorized counterparties, which is approved by Ostrum Asset Management.

The counterparty accreditation and monitoring procedure follows several principles: the formal request for accreditation, the documentation of the entire process and the review of the list, at least yearly and on the occurrence of an event that may lead to the suspension of an approved counterparty and, where appropriate, its removal from the approved list.

This section outlines the two programs adopted by Ostrum Asset Management for the selection of intermediaries to achieve the best results for its clients:

Program 1: transmission of orders from Ostrum Asset Management to Natixis Tradex Solutions

Program 2: specific transactions traded directly

Ostrum Asset Management has Natixis Tradex Solutions handle its orders for its intermediation business⁶

Ostrum Asset Management transmits a large portion of its orders resulting from investment decisions on financial instruments to Natixis Tradex Solutions⁷.

The reliance on an external intermediation expert is designed to help Ostrum AM serve its clients' interests effectively and obtain the best outcome: Natixis Tradex Solutions is an intermediation specialist with ad hoc tools and processes. It operates entirely independently, and in view of the volumes it handles, it is able to obtain the best prices and reduce operational risk. This infrastructure means that orders can be handled in the best interests of its clients.

Natixis Tradex Solutions is a subsidiary of Groupe BPCE and is accredited as a banking and investment services provider by the ACPR (French banking and insurance supervisory authority).

Ostrum Asset Management may at any time request that Natixis Tradex Solutions treat the company as a non-professional client and thus enjoy stronger protection. In this respect, the main criterion will be the total cost representing the price of the instrument or financial contract along with all costs related to execution.

Ostrum Asset Management may also send specific orders to Natixis Tradex Solutions such as orders at closing, contingency orders and limit orders.

⁶ Natixis Tradex Solutions has an execution policy. Ostrum Asset Management has set up a permanent control procedure to monitor and ensure correct implementation of Natixis Tradex Solutions' execution policy (Section 2.5).

⁷ Natixis Tradex Solutions selects intermediaries on the basis of costs and quality of order handling among the list of counterparties/brokers authorized by Ostrum Asset Management (following the accreditation procedure). Counterparties in charge of execution follow the “Best Execution” principle as outlined in MiFID II.

Specific transactions traded directly

Ostrum Asset Management may also send orders directly to approved intermediaries for specific transactions (as detailed below). In this case, Ostrum Asset Management opts for the status as professional client with intermediaries/counterparties.

The intermediary selection process for orders placed directly is established as follows:

- Over-the-counter transactions carried out in connection with the setting up of structured funds:

In general, Ostrum Asset Management carries out the selection process by means of calls for tender. Selection criteria for counterparties chosen to take part in a call for tenders include said counterparty's expertise in the underlying asset supporting the structure and therefore its ability to deliver competitive prices, as well as its ability to accept Ostrum Asset Management's legal provisions in the contracts relating to these transactions. The assurance of long-term support from the counterparty for this activity and its propensity to maintain sustainable service quality on these transactions over the long term are also taken into account.

In a few exceptional cases, Ostrum Asset Management does not use the call for tender approach. These cases are documented by the structuring team and are the subject of a second-level control.

- Transactions carried out in connection with the management of structured funds:

These transactions include transactions related to the reduction of the nominal value of a swap and switches. When a formula fund is being set up, details of these transactions are specified in the contracts.

- Transactions for structuring complex financial instruments (such as EMTNs) traded on an over-the-counter market:

The best execution/best selection process is not based solely on price but takes into account other criteria such as the ability to propose innovative strategies. Ostrum Asset Management mainly uses the calls for tender approach.

In a few exceptional cases, Ostrum Asset Management does not use the calls for tender approach. These cases are documented by the structuring team and are the subject of a second-level control.

The list of specific transactions traded directly is not exhaustive.

2.5. EXECUTION POLICY

Ostrum Asset Management

Ostrum Asset Management's execution policy is based on the principles below:

Instructions received from the client

In the event that the client gives instructions as regards the organization, choice of an intermediary, or only part or a specific aspect of an order, Ostrum Asset Management cannot guarantee that it will secure the best possible result when executing the order.

Similarly, in the event of instructions from Ostrum Asset Management to Natixis Tradex Solutions, the latter may be exempt from its best selection and best execution obligations in order to comply with this instruction first and foremost.

Authorized counterparties

Orders on the over-the-counter market are handled with a counterparty authorized by Ostrum Asset Management.

Products involved

Products involved are financial instruments covered by MiFID II.

Principles for allocation and distribution of orders

Ostrum Asset Management takes all reasonable steps to ensure that all financial instruments are quickly and correctly allocated to the account of the portfolio in question.

Ostrum Asset Management sets out the allocation of orders it issues a priori.

Aggregated orders

Ostrum Asset Management and Natixis Tradex Solutions may aggregate several client orders in accordance with article 321-108 of the AMF General Regulation.

Equal handling of partial executions of aggregated orders is conducted by Natixis Tradex Solutions using an algorithm that takes on board the nominal of each allocation or pre-allocation of the order, all with the same price.

Natixis Tradex Solutions

Main execution venues for orders executed by Natixis Tradex Solutions

Ostrum Asset Management transmits its orders to Natixis Tradex Solutions, which has its own execution policy and can benefit from a wide range of execution venues with a view to providing the best selection of intermediaries and best execution.

While not comprising an exhaustive list, orders sent by Ostrum Asset Management to Natixis Tradex Solutions may be executed on the following execution venues (via an intermediary authorized by Ostrum Asset Management):

- Regulated Markets (RM) ;
- Multilateral Trading Facilities (MTF) ;
- Organized Trading Facilities (OTF) ;
- Systematic Internalisers (SI) ;

- Market makers ;
- Other liquidity providers ;
- Entities that perform similar tasks in a country not party to the Agreement on the European Economic Area.

Ostrum Asset Management authorizes Natixis Tradex Solutions to execute an order outside a regulated market or a multilateral trading facility. The OTC market carries counterparty risk and does not have an order book system.

The list of execution venues selected by Natixis Tradex Solutions, or trading facilities where Natixis Tradex Solutions may execute orders is outlined in appendix 2 “Natixis Tradex Solutions - Selection criteria”.

Selection criteria

The factors for selection and execution taken on board by Natixis Tradex Solutions to ascertain conditions for client order transmission and execution are outlined in appendix 2 “Natixis Tradex Solutions - Selection criteria”.

Execution costs

Intermediation costs and amounts allocated for execution (brokerage) are monitored regularly. This process takes on board remuneration paid to Natixis Tradex Solutions.

Natixis Tradex Solutions has its own “Policy for the selection and execution of orders”, which is communicated to Ostrum Asset Management.

Transactions traded directly by Ostrum Asset Management

As regards those transactions traded directly by Ostrum Asset Management, the manager-traders only place orders via intermediaries that are on the list of authorized counterparties, which is approved by Ostrum Asset Management.

Any new request for the authorization of an intermediary is the subject of an internal accreditation process.

When placing orders, Structured Management retains all information relating to the execution to demonstrate that the selection criteria have been met.

2.6. REGULATORY INFORMATION REGARDING MIFID II

Appendix 1 – Information on Ostrum Asset Management’s orders

Reporting available on the website site www.ostrum.com

- **REPORT ON INTERMEDIATION COSTS PAID OVER FISCAL YEAR 2022**

Pursuant to the AMF’s General Regulation, this report outlines the conditions under which Ostrum Asset Management relied on investment decision-making and order execution services in 2022.

- **ANNUAL REPORT ON TOP FIVE EXECUTION VENUES**

Source: Natixis Tradex Solutions

By way of information, you will find below the link to Natixis Tradex Solutions’ overall program for its intermediation services.

The “Annual report of the top five execution venues for 2022” is available online at the following address: <https://www.tradex-solutions.natixis.com/fr/transparence>.

Appendix 2 - Natixis Tradex Solutions – Selection criteria

- **Policy for the selection and execution of orders**

Source: Natixis Tradex Solutions

The Natixis Tradex Solutions’ “Policy for the selection and execution of orders” dated May 2023 is available online at the following address: <https://www.tradex-solutions.natixis.com/fr/transparence>.

2.7. REVIEW OF EFFECTIVENESS OF SET-UP

Annual reassessment of the policy

In accordance with Position-Recommendation AMF-DOC 2014-07⁸, Ostrum Asset Management formally records in a summary document the main conclusions of the annual reassessment of the Intermediary-counterparty selection and order execution policy. This summary document will be retained for at least five years.

Policy controls

Ostrum Asset Management regularly checks⁹ that the execution procedure set out in this policy ensures the best possible result for the client or whether the company needs to make changes to its execution set-up.

Best execution and/or best selection do not necessarily apply to individual transactions on a line-by-line basis, but rather are assessed on the basis of all transactions carried out over a given period of time.

Ostrum Asset Management has details to attest to best execution for orders handled by Natixis Tradex Solutions: these include information and reporting that Natixis Tradex Solutions has set up.

By way of example, Natixis Tradex Solutions provides Ostrum Asset Management with the following reporting information:

1. Dashboard for cash business, listing amounts of fees paid to brokers;
2. Intermediation statistics that provide details of the distribution of orders among brokers by financial instrument;
3. Overall summary of the result of broker votes;
4. Cost Analysis transaction reporting;
5. Presentation by Natixis Tradex Solutions to Ostrum Asset Management of each change and annual presentation of its policy.

Program to monitor intermediaries and counterparties

Ostrum Asset Management has implemented a program to monitor intermediaries and counterparties and conducts an annual review of intermediaries/counterparties selected. A review is also conducted in the event of any significant change that could have an impact on the ability to achieve the best possible result for clients.

This program is based on:

- The holding of half-yearly portfolio management committee meetings. Participants in these committee meetings are the heads of portfolio management departments at Ostrum Asset Management, the CEO and the head of trading at Natixis Tradex Solutions,
- The carrying out of a second-level control as part of the annual internal control plan.

Ostrum Asset Management then takes the relevant corrective measures depending on any potential failings observed.

⁸ Position-Recommendation AMF-DOC 2017-07 states that: "The annual review of the selection policy should be formally recorded in a summary document that reports on amendments made to this policy and the reasons for these amendments (or alternatively continued application of the current policy) as well as the arguments supporting the decision to add (or not add) new investment services providers for order execution. The AMF recommends that investment services providers retain the summary documents formally recording their annual review of the selection policy for a period of at least five years."

⁹ Article 321-114 V. - Asset management companies shall monitor the effectiveness of the policies established for the purposes of IV on a regular basis, especially with regard to the quality of the execution provided by the entities selected under their policies.

2.8. APPENDIX 1: INFORMATION ON OSTRUM ASSET MANAGEMENT ORDERS

Extract from the REPORT ON INTERMEDIATION FEES OVER FISCAL YEAR 2022 available on Ostrum Asset Management's website.

Intermediation fees involved operations conducted on UCITS/AIF as well as portfolios managed on a discretionary basis. These intermediation fees paid for the 2022 year break down as follows:

- 100% for fees relative to order reception and transmission services and order execution services,
- 0% for fees related to investment decision-making and order execution services (SADIE).

Extract from the ANNUAL REPORT ON TOP FIVE VENUES IN 2022 available on Ostrum Asset Management's website.

Equities and similar instruments, according to liquidity

Tick size liquidity bands 1 and 2 (0 to 79 trades per day)

Class of financial instrument State if <1 order was executed on average per business day in the previous year Top five execution venues ranked by trading volume (descending order)	a) Equities and similar instruments - equities and share certificates iii) Tick size liquidity bands 1 and 2 (0 to 79 trades per day)					
	Y	Volume of executed orders as a percentage of the total volume in this category	Number of executed orders as a percentage of the total number in this category	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
INSTINET (DGQCSV2PHVF712743539)		35.10%	10.00%	Not applicable	Not applicable	0.00%
SG SECURITIES NEW YORK (O2RNE8IBXP4R0TDP41)		18.29%	35.00%	Not applicable	Not applicable	0.00%
VIRTU ITG EUROPE LIMITED (213800EEC95PRUCEUP63)		14.81%	20.00%	Not applicable	Not applicable	0.00%
MORGAN (4PQUHN3JPFQFNF3BB653)		12.22%	5.00%	Not applicable	Not applicable	0.00%
BOFA SECURITIES EUROPE S.A (EQUITY) (549300FH0WJAPEHTIQ77)		8.17%	5.00%	Not applicable	Not applicable	0.00%

Tick size liquidity bands 3 and 4 (80 to 1,999 trades per day)

Class of financial instrument State if <1 order was executed on average per business day in the previous year Top five execution venues ranked by trading volume (descending order)	a) Equities and similar instruments - equities and share certificates ii) Tick size liquidity bands 3 and 4 (80 to 1,999 trades per day)					
	Y	Volume of executed orders as a percentage of the total volume in this category	Number of executed orders as a percentage of the total number in this category	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
VIRTU ITG EUROPE LIMITED (213800EEC95PRUCEUP63)		25.14%	13.64%	Not applicable	Not applicable	0.00%
SG SECURITIES NEW YORK (O2RNE8IBXP4R0TDP41)		18.90%	27.27%	Not applicable	Not applicable	0.00%
MORGAN (4PQUHN3JPFQFNF3BB653)		17.44%	9.09%	Not applicable	Not applicable	0.00%
CREDIT SUISSE AG (ANGGYXN0JLX3X63JN86)		9.80%	13.64%	Not applicable	Not applicable	0.00%
EXANE (969500UP76J52A9OXU27)		9.20%	13.64%	Not applicable	Not applicable	0.00%

Tick size liquidity bands 5 and 6 (over 2,000 trades per day)

Class of financial instrument State if <1 order was executed on average per business day in the previous year	a) Equities and similar instruments - equities and share certificates				
	i) Tick size liquidity bands 5 and 6 (over 2,000 trades per day)				
Top five execution venues ranked by trading volume (descending order)	Volume of executed orders as a percentage of the total volume in this category	Number of executed orders as a percentage of the total number in this category	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
VIRTU ITG EUROPE LIMITED (213800EEC95PRUCEUP63)	15.45%	10.11%	Not applicable	Not applicable	0.00%
MORGAN (4PQUHN3JPFQFN3BB653)	13.63%	6.05%	Not applicable	Not applicable	0.00%
JP MORGAN (K6Q0W1PS1L1O4IQL9C32)	10.48%	13.37%	Not applicable	Not applicable	0.00%
SG SECURITIES NEW YORK (O2RNE8IBXP4R0TD8PU41)	9.70%	10.07%	Not applicable	Not applicable	0.00%
INSTINET (DGQCSV2PHVF712743539)	9.22%	7.25%	Not applicable	Not applicable	0.00%

Debt instruments

Class of financial instrument State if <1 order was executed on average per business day in the previous year	b) Debt instruments				
	N				
Top five execution venues ranked by trading volume (descending order)	Volume of executed orders as a percentage of the total volume in this category	Number of executed orders as a percentage of the total number in this category	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BLOOMBERG TRADING FACILITY LIMITED (BMTF)	15.75%	14.83%	Not applicable	Not applicable	0.00%
TRADE WEB EUROPE LTD (TREU)	11.56%	12.46%	Not applicable	Not applicable	0.00%
BNP PARIBAS (ROMUWSFPU8MPRO8K5P83)	8.79%	6.72%	Not applicable	Not applicable	0.00%
GOLDMAN SACHS & CO LLC (FOR8UP27PHTHYVLBN30)	6.26%	6.82%	Not applicable	Not applicable	0.00%
CITIGROUP GLOBAL MARKETS LTD (XKZZ2JZF41MRHTR1V493)	5.66%	4.07%	Not applicable	Not applicable	0.00%

Interest-rate derivatives

Class of financial instrument State if <1 order was executed on average per business day in the previous year	c) Interest-rate derivatives				
	Y				
Top five execution venues ranked by trading volume (descending order)	Volume of executed orders as a percentage of the total volume in this category	Number of executed orders as a percentage of the total number in this category	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
AUREL BGC (5RJTDGZG4559ESIYLD31)	98.39%	84.79%	Not applicable	Not applicable	0.00%
NATIXIS (KX1WK48MPD4Y2NCUIZ63)	0.40%	5.34%	Not applicable	Not applicable	0.00%
JP MORGAN (K6Q0W1PS1L1O4IQL9C32)	0.19%	1.44%	Not applicable	Not applicable	0.00%
CITIGROUP GLOBAL MARKETS LTD (XKZZ2JZF41MRHTR1V493)	0.19%	1.44%	Not applicable	Not applicable	0.00%
SG SECURITIES NEW YORK (O2RNE8IBXP4R0TD8PU41)	0.18%	1.44%	Not applicable	Not applicable	0.00%

Credit derivatives

Not applicable

Currency derivatives

Class of financial instrument

State if <1 order was executed on average per business day in the previous year

e) Currency derivatives

Y

Top five execution venues ranked by trading volume (descending order)

	Volume of executed orders as a percentage of the total volume in this category	Number of executed orders as a percentage of the total number in this category	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
AUREL BGC (5RJTDGZG4559ESIYLD31)	66.05%	72.22%	Not applicable	Not applicable	0.00%
MORGAN (4PQUHN3JPFQFNF3BB653)	25.42%	12.96%	Not applicable	Not applicable	0.00%
BNP PARIBAS (R0MUWSFPU8MPRO8K5P83)	7.60%	9.26%	Not applicable	Not applicable	0.00%
BOFA SECURITIES EUROPE S.A (549300FH0WJAPEHTIQ77)	0.57%	3.70%	Not applicable	Not applicable	0.00%
GOLDMAN (W22LROWP2IHZNBB6K528)	0.37%	1.85%	Not applicable	Not applicable	0.00%

Structured financial instruments

Not applicable

Equity derivatives

Not applicable

Securitized derivatives

Not applicable

Commodity and emission allowance derivatives

Not applicable

Contracts for difference

Not applicable

Listed index funds

Class of financial instrument

State if <1 order was executed on average per business day in the previous year

k) Listed index funds

Y

Top five execution venues ranked by trading volume (descending order)

	Volume of executed orders as a percentage of the total volume in this category	Number of executed orders as a percentage of the total number in this category	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
TRADE WEB EUROPE LTD (TREU)	88.70%	89.29%	Not applicable	Not applicable	0.00%
FLOW TRADERS B.V. (549300CLJI9XDH12XV51)	7.72%	3.57%	Not applicable	Not applicable	0.00%
JANE STREET NETHERLANDS BV (549300AE0DWETJDYFB39)	3.43%	3.57%	Not applicable	Not applicable	0.00%
NATIXIS (KX1WK48MPD4Y2NCUIZ63)	0.15%	3.57%	Not applicable	Not applicable	0.00%

Emission allowances

Not applicable

Other instruments

Class of financial instrument	m) Other instruments				
State if <1 order was executed on average per business day in the previous year	Y				
Top five execution venues ranked by trading volume (descending order)	Volume of executed orders as a percentage of the total volume in this category	Number of executed orders as a percentage of the total number in this category	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
BNP PARIBAS (R0MUWSFPU8MPRO8K5P83)	56.54%	6.36%	Not applicable	Not applicable	0.00%
FX ALL (FXRQ)	35.20%	76.36%	Not applicable	Not applicable	0.00%
NATIXIS (KX1WK48MPD4Y2NCUIZ63)	8.16%	14.55%	Not applicable	Not applicable	0.00%
TRADITION (969500ULC0Y1IG0A4O72)	0.06%	0.91%	Not applicable	Not applicable	0.00%
CA CIB (1VUV7VQFKOQSJ21A208)	0.04%	1.82%	Not applicable	Not applicable	0.00%

2.9. APPENDIX 2: NATIXIS TRADEX SOLUTIONS – SELECTION CRITERIA¹⁰

Selection and execution factors taken on board to ascertain conditions for client order transmission and execution are as follows, at the very least (extract from the Natixis Tradex Solutions “Policy for the selection and execution of orders”):

- Cost: price and brokerage ;
- Likelihood of execution and settlement reflects the risk of not being able to handle the entire order and/or settle post-trade;
- Speed: between receipt of the order, confirmation of its essential characteristics and execution on the market
- Size of the order: reflects the risk of weighing on the market and the strategy to implement to address this risk;
- Type of order or instrument refers to the following situations:
 - ✓ A specific instruction takes precedence over default execution criteria,
 - ✓ An investment/divestment strategy combining several instruments requires a strategy to handle the order that tends to obtain the best overall result and not instrument by instrument,
 - ✓ Implementing legal documentation (mostly ISDA master agreement) as well as bilateral credit lines (on behalf of clients) are two prerequisites to trade OTC contracts. The skill and speed of potential counterparties in this area are crucial.

To determine the relative importance of execution factors, Natixis Tradex Solutions takes into account the following criteria when executing client orders:

- The characteristics of the order concerned, such as its market impact;
- The characteristics of the financial instruments that are the subject of this order, such as their liquidity, geographical area, sector, etc.;
- The characteristics of the execution venues to which this order may be routed;
- The characteristics of its clients.

Importance of each factor: 1 (crucial), 2 (important), 3 (to be considered), 0 (not applicable)

Instruments financiers	Lieux d'exécution	Stratégies d'exécution	Facteurs
ACTIONS ET ETF			
Actions	<ul style="list-style-type: none"> ▶ Marché réglementé ▶ Système multilatéral de négociation ▶ Système organisé de négociation ▶ Internalisateurs Systématiques ▶ Teneur de marché ▶ Autres fournisseurs de liquidité ▶ Gré à gré 	<p>Les ordres sont transmis via des intermédiaires sélectionnés soit par connexion électronique directe ou via des plateformes de négociation</p> <p>Les Programmes de transaction (Program Trading) peuvent être utilisés pour la négociation de paniers d'actions.</p>	<ol style="list-style-type: none"> 1. Prix 1. Coût* 2. Rapidité d'exécution 2. Probabilité d'exécution et de dénouement <ol style="list-style-type: none"> 1. Taille de l'ordre 2. Nature de l'ordre
Produits indicels cotés	<ul style="list-style-type: none"> ▶ Marché réglementé ▶ Autres fournisseurs de liquidité 	<p>Les ordres sont :</p> <ul style="list-style-type: none"> • mis en concurrence dans une plateforme (RFQ) de plusieurs intermédiaires habilités • ou transmis directement à des intermédiaires sélectionnés 	<ol style="list-style-type: none"> 1. Prix 1. Coût 2. Rapidité d'exécution 2. Probabilité d'exécution et de dénouement <ol style="list-style-type: none"> 1. Taille de l'ordre 2. Nature de l'ordre

* The cost criterion is only taken on board to the extent of information of which NTEX is aware. This may for example include intermediary fees. However, costs for handling an operation (for example by the Middle Office or custodian of the client or taxes) for which NTEX does not have information cannot be taken on board in the allocation decision. Similarly, the choice of a specific broker to decrease the tax impact (purchase/sale in same day) can only be factored in if the Client clearly stipulates it in the instructions.

¹⁰ Extracted from the Natixis Tradex Solutions “Policy for the selection and execution of orders” of May 2023.

Instrument financiers	Lieux d'exécution	Stratégies d'exécution	Facteurs
OBLIGATIONS ET INSTRUMENTS MONETAIRES			
Convertibles	<ul style="list-style-type: none"> ▶Système multilatéral de négociation ▶Système organisé de négociation ▶Internalisateurs Systématiques ▶Teneur de marché ▶Autres fournisseurs de liquidité ▶Gré à gré 	<p>Les ordres sont :</p> <ul style="list-style-type: none"> • mis en concurrence dans une plateforme (RFQ) de plusieurs intermédiaires habilités • ou transmis directement à des intermédiaires sélectionnés 	<ol style="list-style-type: none"> 1. Prix 0. Coût* 1. Rapidité d'exécution et de dénouement 2. Probabilité d'exécution et de dénouement 1. Taille de l'ordre 2. Nature de l'ordre
Obligations & Bons du Trésor	<ul style="list-style-type: none"> ▶Système multilatéral de négociation ▶Système organisé de négociation ▶Internalisateurs Systématiques ▶Teneur de marché ▶Autres fournisseurs de liquidité ▶Gré à gré 	<p>Les ordres sont :</p> <ul style="list-style-type: none"> • mis en concurrence dans une plateforme (RFQ) de plusieurs intermédiaires habilités • ou transmis directement à des intermédiaires sélectionnés <p>Les Programmes de transaction (Program Trading) peuvent être utilisés pour la négociation de paniers d'obligations.</p>	<ol style="list-style-type: none"> 1. Prix 0. Coût* 1. Rapidité d'exécution 2. Probabilité d'exécution et de dénouement 1. Taille de l'ordre 2. Nature de l'ordre
Titres de créance négociables (hors bons du Trésor)	<ul style="list-style-type: none"> ▶Internalisateurs Systématiques ▶Teneur de marché ▶Autres fournisseurs de liquidité ▶Gré à gré 	<p>Les ordres sont transmis directement à des intermédiaires sélectionnés</p>	<ol style="list-style-type: none"> 1. Prix 1. Coût* 1. Rapidité d'exécution 3. Probabilité d'exécution et de dénouement 1. Taille de l'ordre 2. Nature de l'ordre

Instrument financiers	Lieux d'exécution	Stratégies d'exécution	Facteurs
DERIVES			
Dérivés Listés dont Options	<ul style="list-style-type: none"> ▶Marché réglementé ▶Système multilatéral de négociation ▶Système organisé de négociation ▶Internalisateurs Systématiques ▶Teneur de marché ▶Autres fournisseurs de liquidité ▶Gré à gré 	<p>Les ordres sont transmis via des intermédiaires sélectionnés soit par connexion électronique directe ou via des plateformes de négociation</p>	<ol style="list-style-type: none"> 1. Prix 3. Coût* 1. Rapidité d'exécution 1. Probabilité d'exécution et de dénouement 1. Taille de l'ordre 2. Nature de l'ordre
Dérivés Crédit	<ul style="list-style-type: none"> ▶Système multilatéral de négociation ▶Système organisé de négociation ▶Internalisateurs Systématiques ▶Teneur de marché ▶Autres fournisseurs de liquidité ▶Gré à gré 	<p>Les ordres sont :</p> <ul style="list-style-type: none"> • mis en concurrence dans une plateforme (RFQ) de plusieurs intermédiaires habilités • ou transmis directement à des intermédiaires sélectionnés 	<ol style="list-style-type: none"> 1. Prix 0. Coût* 1. Rapidité d'exécution 2. Probabilité d'exécution et de dénouement 1. Taille de l'ordre 2. Nature de l'ordre
Dérivés Taux (OTC)	<ul style="list-style-type: none"> ▶Système multilatéral de négociation ▶Système organisé de négociation ▶Internalisateurs Systématiques ▶Teneur de marché ▶Autres fournisseurs de liquidité ▶Gré à gré 	<p>Les ordres sont :</p> <ul style="list-style-type: none"> • mis en concurrence dans une plateforme (RFQ) de plusieurs intermédiaires habilités • ou transmis directement à des intermédiaires sélectionnés 	<ol style="list-style-type: none"> 1. Prix 0. Coût* 2. Rapidité d'exécution 2. Probabilité d'exécution et de dénouement 1. Taille de l'ordre 2. Nature de l'ordre

Instrument financiers	Lieux d'exécution	Stratégies d'exécution	Facteurs
MARCHE PRIMAIRE			
Marché primaire	<ul style="list-style-type: none"> ▶Teneurs de marché ▶Autres fournisseurs de liquidité 	<p>Les ordres sont placés directement auprès des teneurs de marché ou via des outils dédiés</p>	<ol style="list-style-type: none"> 2. Prix 0. Coût* 2. Rapidité d'exécution 1. Probabilité d'exécution et de dénouement 1. Taille de l'ordre 1. Nature de l'ordre
FINANCEMENT SUR TITRE			
REPO et Prêt / Emprunt	<ul style="list-style-type: none"> ▶Système multilatéral de négociation ▶Teneur de marché ▶Autres fournisseurs de liquidité ▶Gré à gré 	<p>Les ordres sont :</p> <ul style="list-style-type: none"> • mis en concurrence dans une plateforme (RFQ) de plusieurs intermédiaires habilités • ou transmis directement à des intermédiaires sélectionnés 	<ol style="list-style-type: none"> 1. Prix 0. Coût* 2. Rapidité d'exécution 2. Probabilité d'exécution et de dénouement 2. Taille de l'ordre 2. Nature de l'ordre

* The cost criterion is only taken on board to the extent of information of which NTEX is aware. This may for example include intermediary fees. However, costs for handling an operation (for example by the Middle Office or custodian of the client or taxes) for which NTEX does not have information cannot be taken on board in the allocation decision. Similarly, the choice of a specific broker to decrease the tax impact (purchase/sale in same day) can only be factored in if the Client clearly stipulates it in the instructions.

2.10. APPENDIX 3: GLOSSARY

Term	Definition	Sources
Brokers	Also known as third-party dealers, brokers are intermediaries authorized to trade financial assets on a regulated market on behalf of third parties. Traders in the asset management company contact brokers to ensure the best possible execution conditions for their orders, resulting from investment decisions by portfolio managers.	AFG www.afg.asso.fr
Dark MTF	Alternative execution venue, for example the OTC market.	Ostrum Asset Management
Dark pool	The term “dark pool” generally refers to exchanges for trading securities that operate with no pre-trade transparency.	AMF www.amf-france.org
EMTN	Euro Medium Term Notes Listed debt securities issued as part of an issue program.	Ostrum Asset Management
Future	Futures contracts are traded on an organized market between two parties (buyer and seller). They comprise a commitment to buy (for the buyer of the future), or sell (for the seller) an underlying asset (equities, bonds, currencies, commodities, stockmarket indices, etc.) at a set price for delivery and settlement at a future date specified in the contract. Futures do not provide any capital guarantee. They are designed for qualified investors.	AMF www.amf-france.org
Index	A stockmarket index measures share price changes for a sample of listed companies. It reflects the general trend on a market, sector or category of companies. Euronext Paris SA calculates several share indices, such as the SBF 120 and the CAC 40.	AMF www.amf-france.org
Systematic internalization	Systematic internalizers are investment service providers that execute client orders on own account by acting as counterparty in an organized, frequent and systematic way. Internalizers are governed by provisions in articles L. 425-1 and following of the French Monetary and Financial Code and articles 531-1 and following of the AMF General Regulation.	AMF www.amf-france.org
MTF: Multilateral Trading Facility	Multilateral trading facilities are systems that – while not having the quality of a regulated market – ensure that multiple buyers and sellers of financial instruments (equities, bonds, derivatives, etc.), can come into contact and conclude transactions on these instruments. They may be managed by an approved investment services provider or by a market operator. They are supervised by the regulatory authorities (in France, the AMF in connection with the ACPR), which approve the rules and constantly ensure that they operate correctly. The main difference with a regulated market is the degree of information disclosed to investors (generally higher for a regulated market).	AMF www.amf-france.org

Term	Definition	Sources
Regulated markets (via an intermediary approved by the client)	IT platform or system, managed by a market operator that ensures that multiple buyers and sellers of financial instruments (equities, bonds, derivatives, etc.) can come into contact and conclude transactions on these instruments. This kind of market is closely supervised by the regulatory authorities (in France, the AMF in connection with the ACPR) which approve its rules, supervise its members, ensure it operates correctly and monitor information disclosed to investors.	AMF www.amf-france.org
Over-the-counter market	'OTC derivative' or 'OTC derivative contract' means a derivative contract the execution of which does not take place on a regulated market as within the meaning of Article 4(1)(14) of Directive 2004/39/EC or on a third-country market considered as equivalent to a regulated market in accordance with Article 19(6) of Directive 2004/39/EC.	EMIR (REGULATION (EU) No 648/2012 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 4 July 2012
Primary market	To address funding needs, companies, States and public authorities can issue shares, bonds and debt securities. The issue of these securities takes place on the so-called primary market e.g. initial public offerings, rights issues, bond issues.	AMF www.amf-france.org
Nominal	Value of a security at issue Example for a bond: the nominal value of the debt equates to the amount of the debt divided by the number of bonds issued. It can come to €1, but there are also issues with a nominal value of €100 or even €100,000.	AMF www.amf-france.org
Option	Financial instrument whereby an investor has the right to buy (call) or sell (put) a financial asset at a future date (share, bond, currency, etc.) at a price set in advance. Options are risky products.	AMF www.amf-france.org
Underlying	Financial asset (share, bond, etc.) on which an investment is based. Changes in the value of the underlying determine the change in value of the investment.	AMF www.amf-france.org
Swap	Contract to swap future cash flows between two counterparties over a given period. Swap contracts can be standard and generally listed or OTC.	<i>Abrégé des marchés financiers</i>
Market-maker	A person who holds himself out on the financial markets on a continuous basis as being willing to deal on own account by buying and selling financial instruments against that person's proprietary capital at prices defined by that person.	DIRECTIVE 2014/65/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 15 May 2014
Securitization	Financial technique that enables financial institutions to transform receivables they hold on corporates or individuals into marketable securities.	Ostrum Asset Management

Term	Definition	Sources
Volatility	Volatility is the extent of fluctuations in the price of a financial asset and is used as a parameter to assess the asset's risk. When volatility is high, potential gains are usually higher, but the risk of losses is also higher.	Ostrum Asset Management

LEGAL NOTICE

This document is intended for Ostrum Asset Management's clients. It may not be used for any purpose other than that for which it was conceived and may not be copied, distributed or communicated to third parties, in part or in whole, without the prior written authorization of Ostrum Asset Management.

None of the information contained in this document should be interpreted as having any contractual value. This document is produced purely for the purposes of providing indicative information. It constitutes a presentation created and prepared by Ostrum Asset Management based on sources it considers to be reliable.

Ostrum Asset Management reserves the right to modify the information presented in this document at any time without notice, and in particular anything relating to the description of the investment process, which under no circumstances constitutes a commitment from Ostrum Asset Management.

Ostrum Asset Management will not be held responsible for any decision taken or not taken on the basis of the information contained in this document, nor for the use that a third party might make of the information. Figures mentioned refer to previous years. Past performance does not guarantee future results. Any reference to a ranking, a price or a rating of a UCITS/FIA does not prejudice the latter's future results. The outlook mentioned is subject to change and does not constitute a commitment or guarantee.

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

Asset management company regulated by AMF under n° GP-18000014 – Limited company with a share capital of 48,518,602 euros – Trade register n°525 192 753 Paris – VAT: FR 93 525 192 753.

Registered Office: 43, avenue Pierre Mendès-France, 75013 Paris – www.ostrum.com



Ostrum
ASSET MANAGEMENT

An affiliate of:

 **NATIXIS**
INVESTMENT MANAGERS