

ANTI - CORRUPTION POLICY

SOMMAIRE

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1. OSTRUM ASSET ● MANAGEMENT'S COMMITMENT

1.1. OSTRUM ASSET MANAGEMENT'S COMMITMENT

Corruption constitutes an act of fraud that is contrary to ethical standards and subject to severe criminal and administrative sanctions. Violations of anti-corruption regulations are serious and may cause Ostrum AM reputational damage.

Ostrum AM is committed in conducting its business with integrity so as to protect itself against all forms of influence peddling and corruption, which includes the giving or acceptance of bribes in commercial dealings and the corruption of public officials. For the purpose of the present policy, the term "corruption" includes bribery and the payment of kickbacks to public officials or to any other person.

Bribery is the practice of offering anything of value, a cash payment, a charitable act, a loan, the payment of travelling expenses, an expensive gift or invitation to an event, or the promise of employment, either to the corrupted person or to a member of this person's immediate family, in view of inappropriately influencing a business or administrative decision.

To ensure compliance with this prohibition, Ostrum AM has implemented an anti-corruption program intended mainly to promote prevention measures through education and awareness of the best practices that contribute to prevent corruption.

All Ostrum AM employees must understand the importance of the anti-corruption program and comply with the rules laid out in the employee rule handbook and the Code of conduct in the exercise of their duties.

Ostrum AM's executive management is responsible for the anti-corruption program within Ostrum AM.

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2. REGULATORY FRAMEWORK

2.1.REGULATORY FRAMEWORK

Ostrum AM complies with the “Sapin II” Act of 9 December 2016, on Transparency, the Prevention of Corruption and the Modernisation of the Economy, and is thus subject to the obligations to implement Ostrum AM measures to detect and prevent bribery and influence peddling in France and abroad.

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3. PROHIBITED ACTIVITIES

3.1. PROHIBITED ACTIVITIES

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

Prohibited activities include offering, promising, giving (or authorising the offering or acceptance) of a benefit, cash payment or valuable item, either directly or indirectly (for example through a business partner or some other person), to a public official and in general to anyone, in view of:

- influencing an administrative or business decision or
- getting this person to perform his or her duties disloyally or inappropriately or
- obtaining an undue advantage.

Pursuant to Ostrum AM's employee rule handbook and Code of Conduct, Ostrum AM employees are also prohibited from soliciting or accepting an undue advantage in order to induce him to perform or to refrain from performing any act falling within the scope of his responsibilities.

Facilitation payments, which are payments to a public official to facilitate, accelerate or ensure the performance of an administrative decision, are prohibited regardless of the amount involved.

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4. HIGH CORRUPTION RISK

- **ACTIVITIES**

4.1.HIGH CORRUPTION RISK ACTIVITIES

Some activities are particularly exposed to corruption. Ostrum AM has implemented special measures to monitor the following:

- gifts and invitations to events
- trips, accommodation and related expenses
- conferences and events
- charitable acts/donations, sponsoring and philanthropy
- vendors and other third parties
- dealings with public officials
- recruitment practices
- mergers, acquisitions and joint ventures
- accounting.

If an alert is triggered, Ostrum AM must ensure that there is a legitimate business justification for the activity, assess its risk and take appropriate action.

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5. COMPLIANCE PROGRAM

5.1.COMPLIANCE PROGRAM

Ostrum AM has implemented a compliance program intended to promote and ensure compliance with anti-corruption regulations.

These measures include:

- Risk mapping of corruption risks
- The dissemination of company policies, procedures and internal rules
- Education and awareness actions
- An anti-corruption policy for third parties.

Ostrum AM regularly monitors its business activities and business practices to ensure that they comply with the anti-corruption rules and regulations. Monitoring is reinforced in areas where high corruption risks that have been identified in the risks map. The anti-corruption controls are designed to detect “bribes” or other forms of corruption.

Ostrum AM has set up a whistle-blowing procedure that enables employees to signal behaviour or situations that are contrary to Ostrum AM’s anti-corruption measures.

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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