

	FIGHT AGAIN CORRUPTION	POL-006-02-00
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Compliance Department		

Corruption is a serious criminal offense with harmful consequences in all areas, which exposes its perpetrators to high criminal and regulatory sanctions and the entity to significant financial and reputational risks.

CPRAM's anti-corruption framework is part of the AMUNDI group's framework, which is one of the pillars of its ethical and societal commitment, as demonstrated in July 2017 by the group's certification to the international standard ISO 37 001 for its anti-corruption management system.



ANTI-CORRUPTION POLICY

January 2024

Trust
must be earned

Amundi
ASSET MANAGEMENT

Amundi maintains a robust anti-corruption system – one of the pillars of its ethical and societal commitment

Supported by the most senior staff, the commitment of the Group's management bodies led in July 2017 to the certification of its anti-corruption management system under international standard ISO 37001, renewed in 2023 . It certifies that corruption risks have been correctly identified and analysed and that the program adopted by Amundi is designed in such way as to limit these risks by implementing international best practices.

This certification demonstrates Amundi's long-standing commitment to business ethics, as a core component of its corporate social responsibility policy.

What is corruption?

Corruption is the act of an individual in a specific public or private office who solicits, proposes, gives or accepts a commission, a gift, an offer or a promise for the purposes of performing, delaying or omitting to perform an act which is directly or indirectly, within the sphere of their duties.

Objectives of the corruption prevention policy

The purpose of the corruption prevention policy is to make public the main measures that Amundi puts in place to prevent breaches of integrity (in particular corruption and influence peddling) by itself, its managers, its employees and the third parties with which it is in contact.

A "zero-tolerance" policy

The fight against corruption at Amundi Group is underpinned by a zero-tolerance policy and the implementation of effective measures. This policy is part of the compliance and financial security programmes rolled out since 2004, with a view to:

- ensuring transparency and loyalty towards customers;
- contributing to the integrity of financial markets;
- preventing reputational risk and the risk of criminal administrative and disciplinary penalties within its purview; and fighting against money laundering and fraud.

Amundi's anti-corruption system

In accordance with its values, Amundi has implemented a set of ethical rules and procedures to comply with the regulations applicable to it, including an anti-corruption procedure. It has taken this measure not only to comply with new regulations (Sapin 2 in particular) but also to ensure it is in the best possible position to honour its commitment to carry on all its activities honestly and openly, in accordance with the strictest ethical standards, and thus protect its reputation.

A cornerstone of our ethical and societal commitment, the anti-corruption system implemented at Amundi is notably based on:

- a specific governance system for the fight against corruption;
- a corruption risk mapping updated annually;
- a code of conduct incorporating anti-corruption aspects;
- a corruption prevention training and awareness-raising program for all employees;
- a system to protect whistleblowers.

Measures implemented by Amundi

As part of the anti-corruption system in place at Amundi, each business line manager periodically contributes to the analysis and assessment of corruption risks within their activity. Similarly, Amundi includes in contracts with its partners a clause enabling it to terminate the relationship in the event of involvement in an act of corruption.

Each Amundi group entity in France and abroad must implement a procedure to prevent corruption risks, taking into account all specific local regulatory requirements.

Amundi's Code of Conduct has a dedicated section setting out in detail its main rules of conduct in the fight against corruption.

➤ **Fight against bribery**

Corruption hinders free competition and harms economic development; it can have very serious financial, commercial and criminal consequences, which could seriously damage Amundi's reputation and image. Employees involved in an act of corruption may also face disciplinary and criminal sanctions in a personal capacity.

Our anti-bribery policy is simple: employees are strictly prohibited from engaging in acts of bribery (active and passive), in any form and for whatever reason.

Employees play a key role in the bribery prevention system. It is their responsibility to act honestly and responsibly. They complete regular training modules to raise their awareness. If an employee witnesses an attempted or actual act of bribery they can use the whistle-blowing system to alert their superiors or the company confidentially and in complete security.

➤ **Fight against influence peddling and interaction with public officials**

Influence peddling is the act of persons in a position of public authority or entrusted with a public services mission, or elected officials, who solicit or illegally accept directly or indirectly, offers, promises, donations, presents or benefits of any kind for themselves or for others, with the aim of using their real or supposed influence to obtain awards, jobs, markets or any other positive decision from a public authority or public administration.

Our policy is simple: it is strictly forbidden for our employees to engage in influence peddling, whatever the form or reason. All employees must conduct their business in accordance with the anti-corruption regulation applicable in the countries in which we operate.

➤ **Fight against facilitation payments**

A facilitation payment is a specific type of corruption. It involves making small payments made directly or indirectly to civil servants and/or public officials to expedite or guarantee, in the normal course of business, the performance of a routine action to which the payer is entitled. These payments are made in particular in connection with processing a visa application, issuing an authorisation, permit or licence or customs formalities.

Facilitation payments are strictly forbidden.

➤ **Conflicts of interest**

A conflict of interest is any professional situation in which the independence or integrity of the discretion or decision-making of a person, a company or an organisation may be influenced by personal considerations or by pressure from a third party. There are various types of conflict of interest, from personal and professional to financial and political. The most common conflict of interest is a situation in which an employee's personal interests may conflict with those of client or an entity.

In accordance with the Crédit Agricole group's regulatory requirements and procedures, Amundi has chosen to implement a system to prevent and manage conflicts of interest. These may be acts of corruption or influence peddling and expose the Company and its employees to accusations of bias or dishonesty. They can also have consequences on the reputation and image of Amundi and its employees.

➤ **Gifts and invitations**

Corporate gifts are those that are offered and/or received within the context of business relationship. Gifts and invitations can take various forms – invitations to a restaurant, a trade show or an event, for example. They can be offered or received by the organisation itself or one of its employees. Amundi systematically monitors the granting or acceptance of gifts and invitations to avoid any risk of corruption.

The offer or acceptance of a gift or an invitation may in certain circumstances, constitute an act of corruption, if it is intended to persuade a person who is ignorant of their legal, contractual or professional obligations to carry out or refrain from carrying out an act.

Employees must not accept gifts or invitations, directly or indirectly, which may, even unintentionally, compromise their independence, impartiality or integrity. They must refuse all gifts or invitations that could place them in a conflict of interests or under obligation to the donor. Any gift or invitation must have a clear commercial justification and must be subject to the prior authorization of the line management if the maximum amount provided for is exceeded. In the event of doubt, the Compliance Department may be asked for an opinion.

➤ **Lobbying and financing political parties**

Lobbying refers to entering into direct or indirect contact with a public official with a view to influencing a political decision in order to defend the company's own values and interests. Lobbying is part of a more general activity carried out by Amundi's "public and regulatory affairs" team, which keeps us informed about how legislation is applied and policy makers to better understand civil society's expectations. As for the funding of political parties, this is strictly prohibited for legal entities such as companies and foundations.

Amundi plays an active role in the work of the competent professional associations and with experts and practitioners from its various entities and/or the Crédit Agricole group. Lobbying enables Amundi to contribute positively to the development of or changes in the regulations that apply to its activities. Its purpose is to provide a reasoned and professional perspective in order to improve legislative and regulatory decisions pertaining to its areas of activity. Amundi complies with the commitments of Crédit Agricole Group's in this area. In addition to fully respecting the ban on financing political parties, even in countries where this practice is permitted, Amundi complies with the commitments of the Crédit Agricole Group by insisting that its political convictions and commitments of its employees remain personal so as never to implicate or jeopardise the reputation of the Group. These commitments must be made outside of working hours and outside the Company.

➤ **Patronage and charitable actions**

Patronage is a financial or material form of aid provided by a company or an individual to a general interest initiative or activity (cultural, research, humanitarian issues, etc.). The corporate patron receives no contractual advertising or public relations counter-parties involved in the support provided by the patron. The patron's involvement in the event or initiative supported is therefore relatively discreet but may be referred to on its own internal communication media. Patronage is often related to corporate values, but may serve to enhance image and communication and/or internal motivational purposes. Patronage benefits from tax deductions, unlike sponsorship which is considered an advertising investment.

Corporate patronage at the Amundi group is strictly regulated by a committee to avoid any risk of corruption. Since its inception, Amundi has always been a committed operator; its corporate patronage policy therefore draws on its values and those of the Crédit Agricole group – and on four pillars in line with these values: culture, education, solidarity and environment. Any action undertaken or new support provided must therefore be in line with one or more of these pillars. Because our aim is to support our beneficiaries over time, our support is for the most part sustainable, and only on exceptional occasions of an individual nature. All of our support actions are compliant with the Crédit Agricole Group's Ethics Code.

➤ **Whistleblowing procedure**

The aim of the whistleblowing system is to strengthen risk prevention by giving all internal and external employees and commercial partners the means to report the facts that fall within the scope of application of the whistleblowing procedure, in line with the Wasserman Law in France reinforcing the rights of whistleblowers.

A whistleblowing tool is made available by Amundi to collect this information. The BKMS® SYSTEMS whistleblowing platform, common to the Credit Agricole Group is accessible via the internet at any time, from anywhere, at the following address: <https://www.bkms-system.com/Groupe-Credit-Agricole/ethic-alerts>

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