

## ANTI – BRIBERY AND CORRUPTION POLICY STATEMENT

Corruption is a serious criminal offence with damaging consequences in a wide range of areas. It exposes perpetrators to heavy criminal and regulatory penalties and exposes the entity to reputational risks and unlimited fine.

In keeping with its traditional values, Amundi has implemented internal procedures and ethical rules in order to comply with the applicable regulations, including an Anti-Bribery procedure. In doing so, Amundi will not only comply with new regulations but also place itself in the best possible position to protect its reputation and maintain its commitment to carry out business activities in a honest and open way, in accordance with the strictest ethical standards.

**Amundi employees are strictly forbidden from taking part in any corrupt act (active or passive). Amundi employees are also forbidden from giving bribes because they may constitute a corrupt act.**

### **What is corruption ?**

The Council of Europe's Civil Law Convention on Corruption contains the following definition: "Corruption means requesting, offering, giving or accepting, directly or indirectly, a bribe or any other undue advantage or prospect thereof, which distorts the proper performance of any duty or behaviour required of the recipient of the bribe, the undue advantage or the prospect thereof."

As part of its anti-bribery measures, Amundi monitors the practice of receiving or giving gifts and benefits by its employees in the course of their professional activity. Amundi employees must not accept a gift or any other benefit from a third party which may place them in conflict of interest towards their clients or an entity of the group. Invitations must not show sumptuous, excessive or inappropriate hospitality.

In addition, all business heads must periodically contribute to a review of the corruption risks within their activity.

Amundi includes clauses in the contracts with her partners allowing her to break off the relations if they are involved in a corrupt act.

Given the importance that Amundi Group places on the fight against corruption, suspicions of corruption or corrupt acts can be reported by employees from a dedicated process, regardless of the amount in question.

In each entity of Amundi Group, both in France and abroad, a procedure for the prevention of corruption risks must be implemented, taking into account the specific requirements of local legislation.