



London, 14<sup>th</sup> January 2016

### **Anti-Bribery and Corruption Policy Statement**

Amundi Asset Management London Branch, Amundi (UK) Ltd and Amundi Alternative Investments London Branch (together "Amundi") is committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee, individual and business acting on Amundi's behalf is responsible for conducting company business honestly and professionally.

The Bribery Act 2010 requires Senior Management to be committed to implementing and enforcing effective systems to prevent bribery and corruption taking place.

Amundi's Fraud and Bribery Prevention Policy considers that bribery and corruption has a detrimental impact on business by undermining good governance and distorting free markets. Amundi does not tolerate any form of bribery by, or of, its employees or agency staff ("Staff") or any individuals or companies acting for it or on its behalf. All Staff are required to familiarize themselves with and comply with the Amundi Fraud and Bribery Prevention Policy.

A breach of Amundi's Fraud and Bribery Prevention Policy by Staff will be treated as grounds for disciplinary action. Staff should note that bribery is a criminal offence that may result in up to 10 years imprisonment and/or an unlimited fine for the individual and an unlimited fine for Amundi.

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly. Staff are strictly prohibited from making, soliciting, or receiving any bribes or unauthorized payments. As part of its anti-bribery measures, Amundi is committed to engage only in transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure.

Amundi will not conduct business with associated persons or business associates that do not support Amundi's anti-bribery objectives.

The success of Amundi's anti-bribery measures depends on everyone playing their part in helping to detect and eradicate bribery. Therefore, all Staff are encouraged to report any suspicious activity to the Financial Security Representative. The Whistleblowing Policy aims to advise staff of the protection offered who voice concerns in good faith, through the proper channels. All Staff are required to familiarize themselves with and comply with this policy.