



## **FIGHT AGAINST CORRUPTION AND INFLUENCE PEDDELING POLICY**

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

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

### **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 behavior required of the recipient of the bribe, the undue advantage or the prospect thereof."

### **Aims of countering corruption and influence peddling policy**

CPR AM's fight against corruption and influence peddling policy aims to avoid the commission of breaches of probity by itself, its directors, its employees and third parties with which CPR AM is in contact.

### **Countering corruption and bribery's policy**

CPR AM has set up procedures and ethical rules in order to fight against corruption and failure of probity. These measures taken not only to comply with new regulations, but also to place CPR AM in the best possible position to protect its reputation and maintain its commitment to conduct all of its activities in an honest and open manner, in accordance with the highest ethical standards.

CPR AM's anti-corruption and bribery policy is in line within the policy defined by the group AMUNDI based, in particular, on:

- Governance dedicated to the fight against corruption;
- A map of corruption risks;
- Anti-corruption code of conduct;
- Protection status for whistleblower;
- A training and awareness program for all employees;

### **Measures taken by CPR AM**

#### **➤ The fight against corruption and bribery:**

Each business manager must periodically contribute to the analysis and assessment of corruption risks within his activity.

CPR AM includes a clause in its contracts with its partners allowing it to make end to its relations in the event of involvement in an act of corruption.

CPR AM prohibits its staff from taking part in any corrupt activity (active or passive).

Employee participating in an act of corruption may also expose themselves, personally, to disciplinary and criminal sanctions.

Staff are warned about corruption risks through training modules.



This commitment is established in a zero tolerance policy with regard to any unethical behavior in general, and any corruption risk in particular.

This commitment is materialized by:

- The approval by the company's most senior staff of a corruption prevention and detection system,
- The establishment of a corruption risk mapping updated on a regular basis,
- An anti-corruption code of conduct,
- A dedicated communication policy to employees and external partners,
- A protectfull status of whistle-blowers
- The monitoring of the implementation of the various requirements of the Sapin II Law.
- The appointment by the management bodies of Anti-corruption Referent, responsible for the anti-corruption program, for receiving and handling alerts.

#### ➤ **The fight against the influence peddling**

The influence peddling is an act whereby persons in positions of public authority or entrusted with a public service mission, or elected officials, solicit or approve, without right, at any time, directly or indirectly, offers, promises, gifts, presents or any advantages for herself or for others:

- Either to accomplish or to have accomplished, to abstain or to have obtained from accomplishing an act of his function, his mission or his mandate or facilitated by his function, his mission or his mandate;
- Either to abuse or to have abused its real or supposed influence with a view to obtaining from an authority or a public administration distinction, jobs, contracts or any other favorable decision.

Employee are strictly prohibited from engaging in any influence peddling, whatever the form or reason. All employees must conduct business in accordance with applicable fight against the influence peddling regulations.

#### ➤ **Gifts and invitations**

Among the measures taken to fight corruption, CPR AM oversees the practice of gifts and benefits received or offered by its employees in the exercise of their professional activity.

CPR AM employees must not accept a gift or any other advantage from a third party company that could put them in a conflict of interest with their clients or a group entity and the invitations must not show lavish, excessive or inappropriate hospitality.

In case of doubt, CPR AM's Compliance Department may be asked for an opinion.

#### ➤ **Political contributions**

Lobbying (or representation of interests) refers to coming into direct or indirect contact with a public official in order to influence a political decision or to defend the values and interests of the company.

CPR AM complies with the Crédit Agricole group's commitments, formalized through the Responsible Lobbying Charter.

In addition to the ban of financing political parties, including countries where it is authorized, CPR AM requiring that the convictions and political commitments of its employees remain personal and must be exercised outside working hours and outside the company, so as never to engage or harm the reputation of CPR AM or the Amundi Group.

#### ➤ **Counting the facilitation of payments**

Facilitation payments "Also called"grease" payments" is a particular way of corruption.

Facilitation payments are small amounts paid or benefits given (whatever their value) to employees of public bodies or to government authorities in order to facilitate or speed up administrative formalities.



These payments are made in particular within the processing of a visa application, the issuance of an authorization, a permit or a license etc...

Facilitation payments are strictly prohibited.

➤ **Screening of third parties, customers, suppliers, intermediaries ( distributors, brokers):**

"Sapin II" law requires the implementation of procedures for evaluating the situation of customers, suppliers, and intermediaries in the light of the risk mapping.

The evaluation to be conducted entails to carrying out of due diligence, prior to entering into or pursuing a relationship, by collecting information and documents, in order to assess the risks of corruption to which this relationship might directly or indirectly expose CPR AM. It focuses as a priority on the third parties identified in the risk mapping as presenting a corruption risk.

➤ **Sponsorship and patronage**

Patronage is financial or material support provided by a company or an individual for an action or activity of general interest (culture, research, humanitarian aid, etc.). There are non-contractual advertising or public relations considerations in support of the patron. The patron therefore appears relatively discreetly around the event or supported action, but he can show his support on his own communication media.

Within the Amundi Group, sponsorship and patronage are strictly regulated in order to avoid any risk of corruption. Amundi has been a committed player since its creation. Its sponsorship and patronage policy therefore draws on its values and those of the Crédit Agricole Group and on 3 pillars in line with these values: culture, education and solidarity. All sponsorship and patronage activities complies with the Crédit Agricole group's Code of Ethics

### **Whistleblowing**

Any employee who cannot report allegations as part of the Responding to Deficiencies procedures particularly due to their seriousness, or who finds him/herself under pressure likely to lead him/her to commit a deficiency, may exercise his/her whistleblowing rights.

The exercise of the whistleblowing right allows to report, disinterestedly and in good faith, a crime or an offence, a clear and serious violation of an international commitment, a law or a regulation, a serious threat or damage to public interest, a breach of the obligations defined by European or French regulation, a situation or a behavior contrary to the Anticorruption Code of Conduct, of which the whistleblower, a natural person, has had personal knowledge.

An alert system intended to allow the collection of reports is made available by Amundi. The BKMS® SYSTEM alert platform is accessible via the internet at any time and in any place from the following link: <https://www.bkms-system.com/Groupe-Credit-Agricole/alertesethiques>.