



AMUNDI GROUP PUBLIC POLICY REGARDING CLASS ACTION SUITS

1. Introduction

This document describes the policy of Amundi Asset Management and its subsidiaries¹ with regard to participation in shareholder litigation/class actions.

2. What are 'Class Actions'?

Class Actions are collective legal actions brought by the legal owners of securities against issuers of securities usually for damages caused due to the reduction in value of those securities due to misconduct on the part of the issuer such as misrepresentation, fraud or breach of securities law. Class Actions are more common in the USA where the procedure is well established and the legal environment facilitates such litigation. This is due, in part at least, to the fact that (a) all qualifying securities holders claims are automatically included unless they 'opt-out' of the case and (b) each party to U.S. litigation generally pays their own legal costs irrespective of the result.

3. Passive Class Actions

Passive Class Actions are class actions where investors do not take an active role in the course of the proceedings but only apply for a share of the compensation awarded after the conclusion of the legal proceedings. They are common in the USA, where the lead plaintiff decides the litigation strategy on behalf of the class of investors and where all investors in that class are deemed to be bound by the result unless they take positive steps to leave the class (known as 'opt-out'). If the court makes an award it will generally appoint an independent professional claims administrator to distribute settlement monies to aggrieved investors who are members of the class according to their holdings. In order to receive a payment, an investor who is the legal owner of the assets must complete a 'proof of claim and release' form and submit it to the claims administrator before the relevant deadline. Depending on how many investors exercise these rights, there may be more than one round of payments.

4. Amundi Policy on Passive Class Actions

The Amundi Policy with regard to Passive Class Actions is that, in principle, it will consider filing proof of claims forms on behalf of those funds for which it has clear legal authority to do so and is the legal owner of the assets. Amundi engages third party service providers (including law firms) to monitor passive class action announcements and file relevant claim forms on behalf of Amundi funds. The external costs of these third party service providers are deducted from settlement proceeds before they are attributed to the qualifying funds. In light of the administrative cost involved in filing each claim, uneconomic claims below a *de minimus* threshold will not be processed.

5. Active Cases

Active cases are where an investor must 'opt-in' and take a positive step in an attempt to secure financial redress. This may be because no passive class action is available to the investor in the relevant jurisdiction or because the investor chooses to 'opt-out' of the passive class action. Active class actions could therefore involve an investor acting as plaintiff (alone or with others) against an issuer of securities. Active class actions may involve many of the disadvantages associated with litigation, including legal costs and legal risks and the management of litigation (including complying with extensive discovery orders and giving sworn evidence by deposition or in court) which may take several years to conclude, and there is no guarantee that an action will be successful. The nature and extent of the positive action required on behalf of the investor can vary greatly

¹ Excluding subsidiaries in US and Japan and subject to local legal, regulatory and corporate requirements and certain other exceptions.

from one active case to the next as active cases can take many different forms and are by their very nature difficult to categorise.

6. Amundi Policy on Active Cases

The Amundi policy with regard to participation in active cases is that, in principle, it does not generally participate in such actions and will not act as a plaintiff or otherwise take an active role in legal proceedings against an issuer due to the risks and uncertainty inherent in such litigation. Exceptions to this policy may be made on an exceptional basis where there are no material risks to the investors.

7. Third Party Institutional Mandates and Dedicated Funds

In general, the rule is that Amundi will not participate in any class action, active or passive, on behalf of third party institutional clients as it does not usually have any legal authority to do so and the majority of clients reserve this right to themselves or have delegated this function to their custodian instead.

8. Distribution by Amundi of Class Actions Proceeds

Any monies which are paid out by a claims administrator following a class action payment will be transferred, net of external costs, to the Amundi funds involved on a pro rata basis. No payment will be made directly to individual unitholders.