

Luxembourg, 30th of March 2023,

Anti-Bribery and Corruption Policy Statement

Dear Colleagues,

Amundi Luxembourg S.A. is committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee, individual and business acting on Amundi Luxembourg's behalf is responsible for conducting company business honestly and professionally.

With respect to the Fraud and Bribery Policy, the Senior Management is committed to implementing and enforcing effective systems to prevent bribery and corruption taking place.

Corruption, as defined by the « Criminal Law Convention on Corruption » of the Council of Europe, 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 ».

Amundi Luxembourg considers that bribery and corruption have a detrimental impact on business by undermining good governance and distorting free markets. Amundi Luxembourg 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 also forbidden from giving bribes as it may constitute a corrupt act.

A breach of Amundi Luxembourg's Fraud and Bribery Prevention Policy by Staff will be treated as grounds for disciplinary action; non-compliance with anti-bribery and corruption contractual or legal obligations by the Staff is a legal reason for contract termination. Staff should note that bribery is a criminal offence that may result in up to 15 years imprisonment and a 250 000 euros fine.

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

The success of Amundi Luxembourg'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 Head of Compliance. 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.



Jeanne Duvoux,
Managing Director
Amundi Luxembourg S.A.