

**ANTI-CORRUPTION POLICY**

**NATIXIS INVESTMENT MANAGERS  
INTERNATIONAL**

**11 FEBRUARY 2019**

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## **1. Natixis Investment Managers' commitment**

Corruption is the act of 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. Violations of anti-corruption regulations are serious and may cause Natixis Investment Managers reputational damage.

Natixis Investment Managers is committed to conducting its business with integrity so as to protect itself against all forms of influence peddling and corruption, which includes the giving or acceptance of bribes in commercial dealings and the corruption of public officials. For the purpose of the present policy, the term "corruption" includes bribery and the payment of kickbacks to public officials or to any other person. Bribery is the practice of offering anything of value, a cash payment, a charitable act, a loan, the payment of travelling expenses, an expensive gift or invitation to an event, or the promise of employment, either to the corrupted person or to a member of this person's immediate family, in view of inappropriately influencing a business or administrative decision.

To ensure compliance with this prohibition, Natixis Investment Managers has implemented an anti-corruption program intended mainly to promote prevention measures through education and awareness of the best practices that seek to prevent corruption.

All Natixis Investment Managers employees must understand the importance of the anti-corruption program and comply with the principles laid out in Natixis Investment Managers International's Employee Rule Handbook and the Code of ethics in the exercise of their duties.

Natixis Investment Managers' Executive Management is responsible for the anti-corruption program within Natixis Investment Managers.

## **2. Regulatory framework**

Natixis Investment Managers International complies with the "Sapin II" Act of 9 December 2016, on Transparency, the Prevention of Corruption and the Modernisation of the Economy, which requires subject entities to implement measures to detect and prevent bribery and corruption in France and abroad.

## **3. Prohibited activities**

Natixis Investment Managers, its employees, officers and directors must not engage in prohibited activities.

Prohibited activities include offering, promising, giving (or authorising the offering or acceptance) of a benefit, cash payment or valuable item, either directly or indirectly (for example through a business partner or some other person), to a public official and in general to anyone, in view of:

- influencing an administrative or business decision or
- getting this person to perform his or her duties disloyally or inappropriately or
- obtaining an undue advantage.

Pursuant to Natixis Investment Managers International's Employee Rule Handbook and Code of Ethics, employees are also prohibited from soliciting or accepting an undue advantage in order to induce such employee to perform or to refrain from performing any act falling within the scope of his responsibilities.

Facilitation payments, which are payments to a public official to facilitate, accelerate or ensure the performance of an administrative decision, are prohibited regardless of the amount involved.

#### **4. High corruption risk activities**

Some activities are particularly exposed to corruption. Natixis Investment Managers International has implemented special measures to monitor the following:

- gifts and invitations to events
- trips, accommodation and related expenses
- conferences and events
- charitable acts/donations, sponsoring and philanthropy
- vendors and other third parties
- dealings with public officials
- recruitment practices
- mergers, acquisitions and joint ventures
- accounting.

If an alert is triggered, Natixis Investment Managers International must ensure that there is a legitimate business justification for the activity, assess its risk and take appropriate action.

#### **5. Compliance program**

Natixis Investment Managers International has implemented a compliance program intended to promote and ensure compliance with anti-corruption regulations.

These measures include:

- Risk mapping of corruption risks
- The dissemination of company policies, procedures and internal rules
- Education and awareness building
- An anti-corruption policy for third parties.

Natixis Investment Managers International regularly monitors its business activities and business practices to ensure that they comply with the anti-corruption rules and regulations. Monitoring is reinforced in areas where high corruption risks that have been identified in the risk mapping. The anti-corruption controls are designed to detect “bribes” or other forms of corruption.

Natixis Investment Managers International has set up a whistle-blowing procedure that enables employees to escalate behaviour or situations that are contrary to Natixis Investment Managers International’s anti-corruption measures.