

Natixis Investment Managers UK Limited

Anti-Bribery Policy

Approved in: July 2011
Rebranded in: April 2019

SCOPE OF THIS POLICY

This policy applies to the officers and employees of Natixis Investment Managers UK Limited ('Natixis IM UK' or the 'Firm'), including its Middle East branch.

INTRODUCTION

The Firm values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:

- Setting out a clear anti-bribery policy;
- Training all employees so that they can recognise and avoid the use of bribery by themselves and others;
- Encouraging its employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution;
- Taking firm and vigorous action against any individual(s) involved in bribery.

THE POLICY

The Firm prohibits:

- the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement
- *to or from* any person or company, wherever they are situated and whether they are a public official or body or private person or company
- *by* any individual employee, agent or other person or body acting on the Firm's behalf
- *in order to* gain any commercial, contractual or regulatory advantage for the Firm in a way which is unethical
- *or in order to* gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual

FURTHER CLARIFICATION

This policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of the Firm or of the person or body employing them or whom they represent.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded:

- normal and appropriate hospitality
- the giving of a ceremonial gift on a festival or at another special time
- the use of any recognised fast-track process which is available to all on payment of a fee
- the offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to the local senior manager with responsibility for this policy before proceeding. If necessary, guidance on this policy and how it interacts with other policies should also be sought from Compliance.

EMPLOYEE RESPONSIBILITY

The prevention, detection and reporting of bribery is the responsibility of all employees. All employees should report any suspicions or concerns to their Compliance Department.

OTHER RELEVANT POLICIES AND PROCEDURES

- Conflicts Policy
- Whistleblowing Policy.
- Code of Ethics