

CONFLICT OF INTEREST POLICY SUMMARY OF AMUNDI DEUTSCHLAND GMBH

In accordance with the requirements of the European Directive on Markets in Financial Instruments (“MiFID”), Amundi Deutschland GmbH (“Amundi”) shall take all appropriate steps to identify, prevent and manage conflict of interests that can occur in the course of providing investment and ancillary service, including those caused by the receipt of inducements from third parties or by the investment firm’s own remuneration and other incentive structures. Amundi has established a policy to manage its clients’ accounts in a manner that is consistent with the best interests of such clients and to avoid situations where the interests of Amundi interfere with, or have the potential to interfere with, its responsibilities to its clients. The Conflicts of Interest Policy aims to observe and maintain Amundi’s high standards of integrity, fair dealing and market conduct to ensure it acts with due skill, care and diligence in conducting its affairs and those of its clients. Furthermore, the policy aims to prevent the risk of such a conflict developing by foreseeing circumstances and relationships between Amundi and its associates and other affiliates that potentially could be deemed a conflict of interest to Amundi, assess the impact of such conflict on its clients and to devise procedures to address the conflict equitably.

If a conflict is identified, Amundi shall take steps to ensure that an appropriate policy and procedure for addressing the conflict is followed and modifications to existing practises will be made where necessary. If Amundi does not have a suitable policy and procedure in place to address a specific conflict of interest, supplemental policies and procedures shall be prepared in order to address the conflict fairly. Amundi shall not commence any arrangement or initiative that may involve a conflict of interest where there is no supporting policy to avert a conflict.

Amundi has adopted a number of policies and procedures to manage the risk of a conflict of interest, such as the establishment of “Chinese Walls” within its business to act as a buffer for commercially sensitive information by controlling the communication of confidential information between departments and affiliates. Amundi has also developed procedures to identify and prevent conflicts of interest from arising in respect of its investment advisory business activities and has developed procedures which assert the primacy of client orders over associates’ personal accounts. The adoption of independence procedures has established the objective decision-making criteria of Amundi, its associates and affiliates, and established the responsibilities of independent directors on the various corporate boards. Furthermore, Amundi has adopted a pricing policy that ensures that all transactions with affiliated companies are carried out at an arm’s length basis. Internally, Amundi has communicated and circulated an internal conflicts of interest policy to all associates, stressing the importance of vigilance and compliance.

In the unlikely event that a conflict of interest cannot be managed, confidentiality permitting, Amundi will disclose details of such conflict (the general nature and/or sources of conflicts) and the steps taken to mitigate those risks to a client, or potential client before undertaking business on his behalf. Disclosure will be made in a durable medium and include sufficient details to enable that client to take an informed decision with respect to the service in the context of which the conflict of interest arises.

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Amundi Deutschland GmbH

Arnulfstraße 124-126, 80636 München, Deutschland

Telefon: +49 (0)89-992 26-0, Telefax: +49 (0)89-992 26-40 20,

www.amundi.de

Handelsregister: HRB 91 483 München