

SELECTION AND EXECUTION POLICY

SUBJECT:

This document sets out the execution policies and measures taken by Amundi (UK) Limited (“**AMUNDI UK**”) to obtain the best possible result for its clients.

It also defines the measures implemented to monitor on an ongoing basis the efficacy of the current execution arrangements.

1- General background and regulatory framework

AMUNDI UK is a financial institution approved by the Financial Conduct Authority (“**FCA**”) to provide a number of investment services, including advise on investments and making arrangements with a view to transactions in investments. Amundi UK is authorised to trade all financial instruments covered by Section C “Financial Instruments” of Annex I of the Directive 2014/65/EU.

1.1 Context

On the 3rd of January 2018 The Markets in Financial Instruments Directive (Directive 2014/65/EU, known as MiFID II) and regulation (MiFIR) came into force, replacing the previous MiFID directive. MiFID II and MiFIR are designed to strengthen the investor protection and improve market integrity, transparency and the overall stability of the financial sector.

In accordance to MiFID, the requirement of best execution of orders is a key element designed to promote both the overall market efficiency and achieve, at an individual level, the best possible result for the clients. The MiFID II directive reinforces the obligation of authorised Investment Service providers (“**ISP**”) to obtain the best possible result when executing an order on behalf of its clients. The new requirements also provides for greater transparency through the publication of information about the top five execution venues/intermediaries and the quality of execution obtained.

1.2 Regulatory references

The regulatory framework comprises:

- The MiFID II directive: Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 – Art. 24 (1) and 27
- The MiFIR regulation: Regulation (EU) No 600/2014 of the European Parliament and of the Council of 15 May 2014 – Art. 26

- FCA COB 11.2A.2R (1) states that a firm must take all sufficient steps to obtain, when executing orders, the best possible results for its clients taking into account the execution factors. (2) The execution factors to be taken into account are price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of an order.

The MiFIR regulation, alongside the additional “level 2” acts (delegated regulation or technical regulatory standards) applies directly to all Investment Firms with no need of legal transposition by the EU member state.

1.3 MiFID classification

With regard to market execution, AMUNDI UK generally asks to be classified as “**professional client**” by its brokers/counterparties (“intermediaries”), This classification represents an adequate level of protection, particularly in relation to the orders execution quality .

1.4 General principles for best execution

The requirement for best execution is defined in Article 27(1) of the MiFID II directive, and FCA COB rules as the obligation to “...take all sufficient steps to obtain, when executing orders, the best possible result for their clients...”.

The best possible result is determined taking into consideration seven main categories of factors: “price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of the order”.

Where AMUNDI INTERMEDIATION receives from AMUNDI UK specific instructions regarding the execution of an order, it will execute the order in accordance with that instruction. In this case, AMUNDI UK will be informed that AMUNDI INTERMEDIATION is released from the obligation of best execution. When AMUNDI UK will give instructions only in relation to a part of an order, AMUNDI INTERMEDIATION will be responsible to insure best execution in respect of the part of that order not covered by the instructions.

2- Policy for selection of intermediaries

2.1 Selection objective & procedure

AMUNDI UK is not a market-facing investment firm. In order to achieve best execution, AMUNDI UK uses AMUNDI INTERMEDIATION for the transmission and execution of orders. AMUNDI INTERMEDIATION is an investment firm authorised by the ACPR (French prudential control and resolution authority) to provide the services of Reception and Transmission of Orders (RTO) and order execution on behalf of third parties. AMUNDI INTERMEDIATION is authorised to trade in all financial instruments covered by Section C “Financial instruments” of Annex I of Directive 2014/65/EU.

As an ISP providing services involving RTO and order execution for third parties, AMUNDI INTERMEDIATION has its own selection and execution policy, available upon request.

Specific cases

Certain specific transactions may be handled directly by AMUNDI UK's managers. These involve:

- baskets of securities:
for these automated transactions carried out at predetermined prices (opening or closing prices), AMUNDI UK favours above all the total cost criterion and proceed by request for quotes.
- complex OTC transactions:
AMUNDI UK requests competitive quotes from several counterparties. The contacted counterparties must meet qualitative criteria such as proactiveness, the innovative nature of proposals made and the effectiveness of support services. It is ultimately the price that determines the choice of the counterparty. However, the transaction may be shared between the lowest bidders, in accordance with internal rules.

Special cases – specific instructions: given the nature of the structuring activity, the request-for-quote procedure may not be required in certain cases. The absence of request-for-quote will be mentioned in the fund prospectus if such information is required.

However, AMUNDI UK verifies that instruments are traded under market conditions (counter-valuation done internally) and systematically informs the client (communication of the counterparty's name).

2.2 Selection Committee

AMUNDI INTERMEDIATION has established a master list ("CORE") which classify all financial instruments in asset class. The list sets out all the best-performing intermediaries on each financial instrument class according to the criteria and methodologies described in its selection and execution policy.

The CORE list is presented by the head manager of AMUNDI INTERMEDIATION at the annual Selection committee meetings.

After reviewing the statistics on order volumes handled over the relevant period and presenting the vote results based on the predefined criteria, a proposed allocation of trading flows is presented to the selection committees for approval.

AMUNDI UK uses the list proposed by AMUNDI INTERMEDIATION. The list of the 5 main intermediaries selected and used for each type of financial instrument is published annually by AMUNDI INTERMEDIATION.

2.3 Selection policy review

At any time, both AMUNDI UK and AMUNDI INTERMEDIATION may re-examine the conditions and measures for order execution (trading venues, criteria, systems, etc.) in order to obtain the best possible result for clients.

Any material changes in AMUNDI INTERMEDIATION's terms of business (substantial change in pricing, sudden deterioration of the execution facilities i.e. limitation of the perimeter of the securities traded, discontinuity of market access, other major issues that can lead to significant operational risks, etc.) trigger a review of AMUNDI UK's selection policy. With regard to specific transactions that may be handled directly by AMUNDI UK, the relevant portfolio managers perform on an annual basis an overall review of the brokers/counterparties on the basis of the instruments traded with them.

If no exceptional circumstances led to an ad-hoc update, AMUNDI UK's selection policy is regularly reviewed on an annual basis through the selection committee or internal committees. This review is formalised via the committee minutes. The updated version with all the material changes will be directly accessible on the internet and constitutes notification by AMUNDI UK of its clients.

3- Execution policy

3.1 Scope of financial instruments

Amundi UK best execution Policy covers all MiFID II financial that are traded in any financial market.

3.2 Perimeter of the clients

This execution policy is designed for all AMUNDI UK professional and non-professional clients. When portfolio management is delegated to third parties, AMUNDI UK will ensure that the execution policy of the delegated investment managers is consistent with the execution Policy of AMUNDI UK and the best interests of its clients.

3.3 Execution venues included in the scope

AMUNDI UK may use AMUNDI INTERMEDIATION for RTO and order execution services. In this case, AMUNDI UK has access to the final trading venue through AMUNDI INTERMEDIATION which will apply its execution policy to insure that best execution is achieved (cf. 2.1.).

AMUNDI INTERMEDIATION may direct orders, depending on the characteristics of an individual order in order to achieve its best execution requirements, to either Regulated Markets (RM), Swaps Execution Facilities, Multilateral Trading Facilities (MTF), Organised Trading Facilities (OTF), Systematic Internalisers (SI) or any service provider that could provide the best possible conditions in a bilateral (OTC) context.

The list of execution venues - organised by Financial Instrument class and execution strategy applied by AMUNDI INTERMEDIATION to obtain the best possible execution - are described in **Appendix 1**.

AMUNDI UK expressly authorises AMUNDI INTERMEDIATION to execute an order outside a RM, MTF or OTF. However, AMUNDI UK can withdraw this authorisation at any time, on an ad-hoc or permanent basis. Counterparty risk may be more important than with a regulated market. Additional information about the consequences of this means of execution can be provided upon request.

3.4 Execution criteria

AMUNDI UK takes all the measures to ensure that all orders are managed on AMUNDI UK's best interest and the overall integrity of the market, taking into consideration a number of criteria such as price, liquidity, speed, cost, etc. depending on their relative importance based on the order type (please see **Appendix 2**).

The execution matrix by type of financial instrument (cf. Appendix 1) details the factors and execution criteria for each of these asset classes.

AMUNDI INTERMEDIATION and AMUNDI UK will not aggregate orders coming from different clients, if they have the same direction, same terms and for the same security.

However, AMUNDI INTERMEDIATION and AMUNDI UK may exceptionally aggregate (or net, in case of FX) orders where this meets clients' best interests.

3.5 Transmission of orders to Amundi Intermédiation

AMUNDI UK transmit the orders to AMUNDI INTERMEDIATION through a dedicated internal system called "MCE" (electronic order book). The system allows to keep full records of the order chain. AMUNDI UK is fully committed to insure a robust record-keeping system to maintain full evidence of best execution of orders.

AMUNDI INTERMEDIATION will promptly notify AMUNDI UK of any system failure that may happen from time to time. AMUNDI INTERMEDIATION will also advise on any alternative measures that can be put in place to insure business continuity, in accordance with the current Business Continuity Plan.

3.6 Confirmation of execution

Once the order has been executed, a feedback is generated in the MCE order transmission system. The evidence is immediately available to AMUNDI UK's Middle Office, which then verifies the transaction confirmation sent by the intermediary.

3.7 Partial execution and aggregation

In case of partial execution or aggregation of orders, AMUNDI INTERMEDIATION -in accordance with the regulations currently in force, will allocate executed orders pro rata based on initial orders, taking also into consideration any potential minimum tradable amount per instrument. This allocation is done via an algorithm implemented in the MCE.

3.8 Execution policy review

At any time, both AMUNDI UK and AMUNDI INTERMEDIATION may re-examine the conditions and measures for order execution (trading venues, criteria, systems, etc.) in order to obtain the best possible result for clients.

If no exceptional circumstances led to an ad-hoc update, AMUNDI UK's execution policy is regularly reviewed on an annual basis through the selection committee. This review is formalised in the committee minutes.

The updated version with all the material changes will be directly accessible on the internet and constitutes notification by AMUNDI UK of its clients.

4 Regular monitoring & Controls & Review

4.1 Evidence of best execution

In accordance with the regulations, AMUNDI UK retains for five years evidence of all orders executed in line with its current execution Policy. AMUNDI UK will provide evidence upon request.

4.2 Controls

AMUNDI UK will always retain full access to all information relating to executions of orders negotiated by AMUNDI INTERMEDIATION in order to verify, if necessary, the adequacy of the service provided by AMUNDI INTERMEDIATION and its compliance with the execution policy.

On a monthly basis AMUNDI UK receive from AMUNDI INTERMEDIATION a report containing statistics and information about all Financial Instruments executed through AMUNDI INTERMEDIATION. The report contains information about:

- the monthly volume of orders negotiated in the relevant year ;
- the numbers of orders executed by the various brokers;
- the monitoring of best execution in accordance with AMUNDI INTERMEDIATION's execution policy.

The information sets out in the report will be used by AMUNDI UK to implement the relevant controls that are deemed appropriate.

APPENDIX 1

(Execution Strategies)

Financial Instruments	Execution venue(s) typology (*)	Execution venue selection strategies in order to obtain the best possible execution	Execution factors with their attributed relative importance (1=dominant, 2 significant, 3 to be considered, 0 not applicable)
EQUITIES			
Equities	RM, MTF, SI	Orders are transmitted via selected intermediaries (refer to selection policy) by direct electronic connection i.e. via trading platforms (algorithms, DMA)	1.Price 1.Cost 1.Liquidity 1. Order size 1. Order type (**) 2.Execution speed 2.Execution probability
ETF (equities, debt & commodities)	RM, MTF, OTC	The orders are: - subject to a request-for-quote (RFQ) process among several authorised counterparties (refer to selection policy) when market liquidity is ensured either by market makers or by counterparties accessible via electronic trading systems - or sent to selected intermediaries (if there is sufficient liquidity on a RM)	1.Price 1.Cost 1.Liquidity 1. Order size 1. Order type (**) 2.Execution speed 2.Execution probability
Warrants, rights, equity-linked notes, bills, certificates, CFD etc.	RM, OTC, OTC	The orders are sent to: - selected intermediaries (if there is sufficient liquidity on a RM) - or subject to a request-for-quote (RFQ) process among several authorised counterparties (refer to selection policy) when market liquidity is ensured either by market makers or by counterparties accessible via alternative trading systems	1.Price 1.Cost 1.Liquidity 1. Order size 1. Order type (**) 2.Execution speed 2.Execution probability
BONDS and MONEY MARKET INSTRUMENTS			
Convertible bonds	RM, OTC, OTC	Request-for-quote (RFQ) process among several authorised counterparties (refer to selection policy). Market liquidity is ensured either by market makers or by counterparties accessible via alternative trading systems	1.Price 1.Cost 1.Liquidity 1. Order size 2.Execution probability 2. Order type (**) 2. Underlying liquidity 3.Execution speed
Bonds & Sovereign bonds	RM, MTF, OTC, SI, OTC	Request-for-quote (RFQ) process among several authorised counterparties (cf selection policy). Market liquidity is ensured either by market makers or by counterparties accessible via alternative trading systems	1.Price 1.Liquidity 1. Order size 1. Order type (**) 2.Cost 2.Execution probability 3.Execution speed

Financial instruments	Execution venue(s) typology (**)	Execution venue selection strategies in order to obtain the best possible execution	Execution factors with their attributed relative importance (1=dominant, 2 significant, 3 to be considered, 0 not applicable)
Money markets (excluding sovereign bonds)	OTC, OTF, MTF	Request-for-quote (RFQ) process among several authorised counterparties (cf selection policy). Market liquidity is ensured either by market makers or by counterparties accessible via alternative trading systems	<ul style="list-style-type: none"> 1.Price 2.Cost 2.Execution probability 2. Order size 3.Execution speed 3. Liquidity 0. Order type (**)
LISTED DERIVATIVES			
Equities derivatives	RM	The orders are sent to: - selected intermediaries (if there is sufficient liquidity on a RM) - or subject to a request-for-quote (RFQ) process among several authorised counterparties (cf selection policy) when market liquidity is ensured by market makers	<ul style="list-style-type: none"> 1.Price 1.Cost 1.Liquidity 1. Order size 1. Order type (**) 2.Execution speed 2.Execution probability
Rate derivatives	RM	The orders are sent to: - selected intermediaries (if there is sufficient liquidity on a RM) - or subject to a request-for-quote (RFQ) process among several authorised counterparties (cf selection policy) when market liquidity is ensured by market makers	<ul style="list-style-type: none"> 1.Price 1.Cost 1.Liquidity 1. Order size 1. Order type (**) 2.Execution speed 2.Execution probability
Commodity derivatives and on emission quotas	RM	The orders are sent to: - selected intermediaries (if there is sufficient liquidity on a RM) - or subject to a request-for-quote (RFQ) process among several authorised counterparties (cf selection policy) when market liquidity is ensured by market makers	<ul style="list-style-type: none"> 1.Price 1.Cost 1.Liquidity 1. Order size 1. Order type (**) 2.Execution speed 2.Execution probability

Financial instruments	Execution venue(s) typology (*)	Execution venue selection strategies in order to obtain the best possible execution	Execution factors with their attributed relative importance (1=dominant, 2 significant, 3 to be considered, 0 not applicable)
OTC derivatives (except forex)			
Credit derivatives	MTF, SEF, OTF, SI, OTC	Request-for-quote (RFQ) process among several authorised counterparties (cf selection policy). Market liquidity is ensured either by market makers or by counterparties accessible via alternative trading systems	<ul style="list-style-type: none"> 1.Price 1.Execution speed 1.Execution probability 2.Liquidity 2. Order size 2. Order type (**) 3.Cost
Commodity derivatives and on emission quotas	MTF, SEF, OTF, SI, OTC	Request-for-quote (RFQ) process among several authorised counterparties (cf selection policy) according to terms and frequency adapted to each type of underlying. According to these same underlyings, liquidity is provided by market makers or counterparties to whom an order is sent for execution, accessible via trading systems or by bilateral contact.	<ul style="list-style-type: none"> 1. Cost 2. Execution probability 3. Price 3. Execution speed 3. Liquidity 3. Order size 3. Order type (**)
Other OTC derivatives (interest-rate swaps, inflation swaps, swaptions, cap & floor, etc.)	MTF, SEF, OTF, SI, OTC	Request-for-quote (RFQ) process among several authorised counterparties (cf selection policy). Market liquidity is ensured either by market makers or by counterparties accessible via alternative trading systems	<ul style="list-style-type: none"> 1.Price 1.Execution speed 1.Execution probability 2.Liquidity 2. Order size 2. Order type (**) 3.Cost
FOREIGN EXCHANGE			
Spot	OTF, OTC, MTF	Request-for-quote (RFQ) process among several authorised counterparties (cf selection policy). Market liquidity is ensured either by market makers or by counterparties accessible via alternative trading systems	<ul style="list-style-type: none"> 1.Price 1.Liquidity 1. Order type (**) 2.Cost 2.Execution speed 2.Execution probability 2. Order size

Financial instruments	Execution venue(s) typology (*)	Execution venue selection strategies in order to obtain the best possible execution	Execution factors with their attributed relative importance (1=dominant, 2 significant, 3 to be considered, 0 not applicable)
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PACKAGES			
Linked orders involving a combination of interventions, often in opposite directions, in various instruments or types of instruments (arbitrage, assets + hedging, more complex rebalancing etc.)	RM, MTF, OTF, SI, OTC	Tailored execution strategy for each package determined by the trader taking into account the individual characteristics of each instrument and overall liquidity of the group	1.Price 1.Liquidity 2.Cost 2.Execution speed 2.Execution probability 2. Order size 2. Order type (**)

(*)

RM: Regulated market (e.g. NYSE Euronext, LSE, etc.)

MTF (or SMN for *Système Multilatéral de Négociation*): Multilateral Trading Facility, which is a system used by an investment services provider or market company to organise the confrontation of buy/sell orders on Financial Instruments, without having the quality of a regulated market. (BATS, Equiduct, Turquoise, etc ...)

SI: Systematic Internaliser, which executes client orders outside RMs and MTFs by acting directly as a counterparty and committing its equity capital

OTF (or SON for *Système Organisé de Négociation*): Organised Trading Facility, which is a category of trading system/platform introduced by MiFIR where bond products, structured products, issuance quotas and derivatives excluding equities and similar instruments (certificates, ETF) can be traded

OTC (Over The Counter): Over-the-counter market

(**)

Please refer to Appendix 2, types of orders and associated execution benchmarks

APPENDIX 2

(Order Types)

Orders types	Execution strategies	Definitions	MIFID criteria	FOREX	FIXED INCOME (*)	DERIVATIVES	EQUITY
STRATEGY BY DEFAULT	At discretion (Arrival Price)	Order without any price limit to be executed within the current price and volume conditions	Price - Liquidity	X	X	X	X
TARGET TIME (Sensitive to execution time)	Portfolio manager has to choose the execution time in a scrolling menu of its PMS						
	Market (ASAP)	Order without limit of price, to be executed as soon as possible	Speed - Liquidity	X	X	X	X
	Open	Order to be executed at opening price	Liquidity - Cost	X		X	X
	Close	Order to be executed at closing price	Liquidity - Cost		X	X	X
	Close Limit	Order to be executed at closing price, with a maximum/minimum limit	Liquidity - Cost			X	X
	Trade Time to input	Order to be executed at a specific time chosen by the portfolio manager	Speed - Liquidity	X	X	X	X
	Fixings WMR	Fixing WMR 16h00 London (FX), BFIX Tokyo 12:30, TTM 9:55 (Tokyo Nakane)	Liquidity - Cost	X		X	
TARGET PRICE (Sensitive to execution price)	Portfolio manager has to choose the execution price in a scrolling menu of its PMS						
	Limit (Limit - Take Profit)	Order with a minimum/maximum limit	Liquidity - Cost	X	X	X	X
	VWAP	Execution on the basis of the volume weighted average price since the order arrival time, and by default until the close of the market	Price - Liquidity			X	X
	At Discretion (Arrival Price)	Order without any price limit, to be executed within the current price and volume conditions	Price - Liquidity	X	X	X	X
	Stop	Conditional order executed when the security / contract reaches a trigger threshold	Liquidity - Cost	X		X	
	Max deviation to Arrival Price	Order to be executed with a maximum deviation from the arrival price (ALTO time stamping) and expressed in bps	Liquidity - Cost				X
	NAV	ETF : Order to be executed at the official NAV (Net Asset Value)	Liquidity - Cost				X
TARGET VOLUME (Sensitive to volume)							
	PWP	Order to be executed with an average participation target (%) of the volumes traded in the market	Price - Liquidity				X

(*) BONDS + CDS + IRS

For any financial instrument category, the default execution strategy will be "At Discretion"

The default execution strategy will be "Market" for the order type "Target Time"

The default execution strategy will be "At Discretion" for the order type "Target Price"

NB: the benchmarks defined by type of order, by scope of instruments as well as the deviation thresholds retained for justification can be communicated at the client's request