

Execution Policy

of

Amundi Austria GmbH

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Table of contents

1.	Purpose	3
2.	Scope	3
3.	Basic principles of the execution policy and the relevant criteria for the manner in which the order is executed.....	3
4.	Outsourcing of the trading activity to Amundi Intermediation S.A.	5
5.	Other arrangements.....	9
6.	Review and updating of the selection and execution policy.....	10

**Policy on selecting trading partners
and selecting trading decisions (Execution Policy)**

1. Purpose

We have published the principles which govern how we select our trading partners and execute transactions involving financial instruments for Amundi Austria GmbH funds (Execution Policy) in the interests of sustaining long-term business relationships with our customers based on fairness, transparency, and trust.

2. Scope

This execution policy for Amundi Austria GmbH (hereinafter “Amundi AT”) applies to all purchases and sales of financial instruments conducted by Amundi AT during the course of fund management and pertains to all trading venues (regulated markets, multilateral trading facilities, off-market and over-the-counter, etc.).

When delegating the fund management to a third party, the respective delegated party must ensure the best possible execution of the order. In this respect, Amundi AT only works with licensed partners who are subject to the supervision of the public authorities as well as the same legal requirement in order to guarantee the best execution.

3. Basic principles of the execution policy and the relevant criteria for the manner in which the order is executed

Amundi AT aims to always and solely act in the best interests of the managed funds and their investors. Therefore, Amundi AT will take all the appropriate measures to consistently achieve the best possible result when executing trading decisions for the managed investment fund.

In concrete terms, objective criteria must be used both in the selection of trading partners and the decisions concerning the manner in which the respective transactions (for order types, shown in the table in section “Durchführungskriterien”) are to be executed as well as when selecting the trading venues, and these are to be performed in the sole interest of the customer and of safeguarding the integrity of the financial markets. The "best possible result" refers to the best possible results to be expected when viewed as a whole over a period of time.

The total cost (the transaction costs and the price) is an essential criterion when deciding on the manner of the execution.

Additional criteria include:

- The market liquidity
- The size of the order
- The type of financial instrument
- The speed of the execution
- The likelihood of an execution and settlement

In certain circumstances, the weighting of the above criteria can vary on an individual basis. This will depend on the market situation when the order was placed. The above list is not to be regarded as exhaustive. There may also be various other, qualitative factors that are also relevant when deciding on the manner in which an order will be executed.

Amundi Austria GmbH itself as a management company is market facing only in the case of fixed income securities, where trades are usually performed over-the-counter (OTC). For equity trading, trading partners (execution brokers) are used, who provide market access and who act as trading counterparties.

Amundi AT, when it acts in the name of and on behalf of its clients, has generally opted for the status of "professional client" in relation to its brokers and counterparties, in order to receive on their behalf a sufficient level of protection, particularly as regards execution quality for its orders.

For the selection of brokers that shall execute trades on behalf of clients especially factors like brokerage fees, trading expertise, infrastructure and availability will be taken into account. Brokers are analysed through a process-orientated evaluation which ensures that orders are placed through such brokers only who in turn have implemented their own best execution policies and procedures – be it that they are located in the EEA and thus being subject to MiFID II regulations or that they located outside the EEA and disposing of execution arrangements that allow Amundi Austria GmbH to act in coherence with its best execution regulations.

A list of counterparties, which has been recommended by the Investments department of the management company, is regularly monitored in terms of creditworthiness of the counterparties.

4. Outsourcing of the trading activity to Amundi Intermediation S.A.

Amundi AT has outsourced its trading activity (the execution of transactions) to an affiliate namely Amundi Intermédiation S.A. based in 90, Boulevard Pasteur, 75015 Paris/France (“Amundi Intermédiation”, “Trading Desk”) in order to achieve its aims in connection with the best possible execution of trading decisions.

Amundi Intermediation is a specialised investment company authorized by the French banking and insurance supervisory authority, the "Autorité de contrôle prudentiel et de résolution (ACPR)" to provide services involving the receipt, transmission and execution of orders concerning financial instruments for third parties.

The following division of tasks is planned as part of the collaboration between Amundi AT and Amundi Intermédiation: The relevant fund managers at Amundi AT remain responsible for the actual investment decisions and for prioritizing the above criteria concerning the form of execution (for order types, for order types, shown in the table in section “Durchführungskriterien”), and Amundi Intermédiation will select the most suitable trading partner or trading venue whilst taking account the type of order chosen by the fund manager, and will place the order.

Amundi Intermédiation has its own selection and execution policy for this, which is available on the Amundi AT website (www.amundi.at) under **Informationen & Veröffentlichungen → Amundi Austria → Execution Policy Amundi Intermédiation.**

Amundi AT can only deviate from this procedure and submit orders directly to counterparties itself in exceptional cases and under special circumstances (e.g. technical problems). In this event, Amundi AT will also strive for the best possible order execution within the sense of the above criteria.

Policy for selecting trading partners (execution brokers)

Amundi Intermédiation has planned an annual coordination procedure based on objective, proven and relevant criteria for selecting trading partners and this will involve representatives from Amundi AT. This procedure will produce a list, agreed between Amundi Intermédiation and Amundi AT, of business partners according to instrument categories (e.g. shares, bonds, ETFs, derivatives, etc.) who, based on the defined selection criteria and the service requirements for Amundi AT, are most suitable for executing trading decisions. Amundi

Intermédiation will therefore be able to draw upon this list to execute or forward trading orders for Amundi AT funds.

The criteria for selecting trading partners include:

- Quality of trading information
- Access to markets
- Quality of execution
- Commission/prices (determined by transaction cost analyses)
- Quality and speed of trade settlements
- Volumes traded

Additionally, all trading partners must constantly meet specific risk management and KYC (know your counterpart) requirements as well as guarantee the best possible execution on their part. Amundi Intermédiation will constantly monitor the performance of the trading partners and the quality of their execution and will even undertake a reassessment which is in addition to the annual coordination process if there are significant changes or variations.

A list of the five main intermediaries, depending on the type of financial instrument traded, of Amundi Intermédiation is published annually by Amundi Intermédiation and available on the Amundi AT website (www.amundi.at) at ***Regulatorische Informationen → Execution Policy Amundi Intermédiation.***

Selection policy for research partners (research brokers)

The commitment of Amundi AT to act in the best interests of the funds and investors is not only limited to the best possible execution of investment decisions. It also includes the procurement of additional research services in the interest of the managed investment funds and their unit holders.

Therefore the Amundi AT execution policy has stated that the order execution and research fees should be "unbundled". Therefore the payment for the service of the order execution is strictly separated from those of the research service. This generally facilitates the best possible procurement of these services for the Amundi AT funds. At the same time, the separate assessment of the services provided by the execution brokers on one hand and the research brokers on the other hand means that possible conflicts of interests can be avoided more effectively.

Execution criteria

Amundi AT has commissioned Amundi Intermédiation with the receipt and the transmission of orders with regards to financial instruments, as well as with the execution of orders. Amundi Intermédiation offers Amundi AT access to all the relevant markets and trading partners which enable the best possible order execution on the basis of the above policy for selecting trading partners.

Amundi Intermédiation directs the orders either to regulated markets (RM), multilateral trading facilities (MTF), systematic internalisers (SI) or to organized trading facilities (OTF) depending on where the best trading conditions are available or any service provider that could provide the best possible conditions in a bilateral (OTC) context.

In this respect, Amundi AT has also specifically commissioned Amundi Intermédiation to execute orders which are outside of the regulated markets or multilateral trading facilities if it is expected that this will contribute to the best possible order execution. However, Amundi AT reserves the right to revoke this instruction at any time.

The types of trading venues for the individual types of financial instruments and the strategies employed by Amundi Intermédiation in order to achieve the best possible order execution are included in the Amundi Intermédiation selection and execution policy which is available on the Amundi Austria GmbH website (www.amundi.at) under **Regulatorische Informationen** → **Execution Policy Amundi Intermédiation**.

All measures are taken so that the order is executed in the best interests of the funds and with a focus on the integrity of the market whilst taking into account the input of given criteria such as price, liquidity, speed and cost etc., depending on their relative importance according to the various possible types of order and the associated criteria for execution which are outlined in the following table:

Type of order	Target price or benchmark	Execution criteria
discretionary	entry price (last stock exchange quotation)	price and liquidity
conditional / conservative	VWAP (volume weighted average price)	price and liquidity
market	entry price (last stock exchange quotation)	speed and liquidity

limit	set limit	liquidity and cost
at opening	opening price	liquidity and cost
at closing	closing price	liquidity and cost

Order transmission to Amundi Intermédiation, Response

Orders are transmitted by Amundi AT to Amundi Intermédiation through Amundi Group's internal order routing system "MCE" (electronic order book) to ensure seamless traceability and documentation. In the same system, there is also immediate feedback on the implementation.

In the event of a malfunction that causes the order transmission system to be ineffective, Amundi Intermédiation will notify its clients of the system failure and advise on the alternative measures in line with the current Business Continuity Plan.

Consolidation of orders, partial executions

Orders are always processed in their incoming order by Amundi Intermédiation. The transactions for one fund can be consolidated with the transactions from another fund and performed jointly if this is in the interest of all the unitholders.

If there is a partial execution of such orders, the allocation is performed to the investment funds involved according to policies which have already been defined in advance and strictly proportionate on the basis of the originally issued order and in accordance with the minimum trading size of the respective instrument type.

Monitoring and controls

The Compliance Department of Amundi Intermédiation is involved in a two-stage evaluation of the quality of the order execution as well as the transaction costs which is performed by Amundi Intermédiation and which also takes the comparative data from an independent, external provider into consideration.

Amundi Intermédiation sends Amundi AT a monthly report on the key statistical data, according to instrument type, and relating to the services which have been provided. It is based on the above reviews and also includes the following elements:

- Volumes traded and number of orders for each trading partner
- Outcomes of the reviews concerning the quality of order executions at Amundi Intermédiation level
- Information about the transaction cost analysis
- Accrued transaction fees for each broker

In addition to this, Amundi AT currently has full access to all the relevant information relating to the orders executed by Amundi Intermédiation so that it can independently assess the quality of the service provided by Amundi Intermédiation. Based on this information the Compliance Department of Amundi AT performs independent inspection procedures at regular intervals and reports to the management and the Supervisory Board of Amundi Austria.

All records and documentation relating to the monitoring of the quality of execution will be kept by Amundi AT for at least five years.

5. Other arrangements

Purchase and sale of investment fund units (except for ETFs)

For the Amundi Austria funds the respective custodian bank / depositary is in charge of issuing and redeeming Amundi AT fund units.

The agent fund trading service for the Vienna branch of the State Street Bank International GmbH also processes orders placed with regard to third-party funds (i.e. funds from other management companies), but not through exchange traded funds.

Likewise, orders placed with regard to third-party funds (i.e. funds from other management companies, except exchange traded funds) are processed through the respective transfer agent of the fund (i.e. either through the Agent Fund Trading Service of State Street Bank International GmbH for funds with depositary State Street Bank International GmbH (Vienna), or through the order routing platform of depositary UniCredit Bank Austria AG)

Explicit instructions from special fund clients

Amundi AT can deviate from the above execution policy if explicit client instructions have been issued by all of the clients for the special purpose fund. In this situation, the order is executed

at the request of the customer and in accordance with the nature of the order and the parameters (place of execution and limit, etc.) defined by the client.

Amundi AT hereby advises that an explicit client instruction concerning the execution of an order may prevent it from achieving the best possible results within the scope of its execution policy.

6. Review and updating of the selection and execution policy

Amundi AT will review this execution policy at least once a year and amend it as appropriate in order to continue to achieve the best possible results for the managed funds. There will be an immediate review and adjustments where appropriate if there are significant changes.

If there are amendments, the updated version will be made available on the Amundi AT website (www.amundi.at) at ***Regulatorische Informationen -> Execution Policy Amundi Austria.***