



THEMATICS

asset management

ANTI-CORRUPTION POLICY

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Thematics Asset Management's commitment

Corruption is fraudulent behaviour that is unethical and subject to severe criminal and administrative sanctions. Violations of anti-corruption regulations are by their nature serious and may, in particular, harm the reputation of Thematics Asset Management ("Thematics AM").

Thematics AM has made a commitment to conduct its business with integrity and thus prevent 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 this document, the term "corruption" includes bribery and the payment of kickbacks to public officials or to any other person. Bribery is the practice of offering some valuable item, 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 prevent such practices, Thematics AM has deployed anti-corruption measures that serve to raise awareness of the problem and of the best practices that serve to prevent corruption.

Pursuant to the company's Bylaws and Code of Conduct, all Thematics AM employees must understand the importance of these measures and observe them in the exercise of their duties.

Thematics AM's Senior Management is responsible for organising efforts to prevent corruption within Thematics AM. The Compliance and Internal Control Officer oversees anti-corruption measures.

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Regulatory framework

Thematics AM complies with the French Law of the 9th December 2016 on Transparency, the Prevention of Corruption and the Modernisation of the Economy, known as the "Loi Sapin II", which requires Thematics AM to put in place measures for detecting and preventing corruption in France and abroad and for representing interests (i.e. lobbying) and reporting interest-representation activities, when this is a primary or regular activity.

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Prohibited activities

Thematics AM, 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
- getting this person to perform his or her duties disloyally or inappropriately,
- obtaining an undue advantage.

Pursuant to Thematics AM's Bylaws and Code of Conduct, Thematics AM employees are also prohibited from soliciting or accepting an undue advantage to perform or to refrain from performing some act that falls within the scope of their employment.

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.

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High corruption-risk activities

Some activities are particularly exposed to corruption. Thematics AM 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, Thematics AM must ensure that there is a legitimate business justification for the activity, assess its risk and take appropriate action.

Compliance measures

Thematics AM has implemented various preventive measures to promote anti-corruption regulations and ensure compliance.

These measures include:

- the mapping of corruption risks
- the setup of company policies, procedures and standards
- training and awareness-raising actions
- an anti-corruption policy for third parties.
- a system for reporting interest-representation activities to the HATVP.

Thematics AM regularly monitors its business activities and practices to ensure that they comply with anti-corruption rules and regulations. Monitoring is stepped up on high corruption risks that have been identified in the risks map. This monitoring serves to detect the granting of a bribe or other form of corruption.

Thematics AM has set up a whistle-blowing procedure that enables employees to signal behaviour or situations that are contrary to Thematics AM's anti-corruption measures.