

# Anti-corruption policy

May 2019

## 1. Mirova's commitments

Corruption is fraudulent, unethical behavior and is subject to heavy criminal and administrative sanctions. Violations of anti-corruption regulations are serious and can damage Mirova's reputation.

Mirova does business with integrity in order to protect itself from all forms of influence and corruption, including the use of and acceptance of "bribes" and the corruption of public officials. For the purposes of this policy, the term "corruption" includes the giving of "bribes" and the payment of kickbacks to public officials or any other party. A "bribe" refers to the practice of offering items of value, cash payments, charitable contributions, travel expenses, expensive gifts, invitations to costly events, or promises of employment to either a corrupt individual or one of their immediate family members in order to influence a business or policy decision.

In order to ensure that the anti-corruption policy is respected, Mirova has put an anti-corruption framework in place to raise awareness and to promote best practices for preventing corruption. Each of Mirova's associates should understand the importance of this framework, which Mirova's Internal Regulations and Code of Ethics oblige them to comply with, and to adhere to its principles while fulfilling the responsibilities of their position.

Mirova's executive management team is responsible for preventing corruption from occurring within Mirova. The Head of Compliance and Internal Control is the designated reference person for information regarding the measures in place for preventing corruption.

## 2. Regulatory framework for combatting corruption

In accordance with the "Sapin II" Law issued on December 9, 2016 to increase transparency, prevent corruption, and modernize business practices, Mirova has put in place measures for identifying and preventing acts of corruption and influence peddling, both in France and abroad, as well as a reporting program which allows for Mirova's lobbying activities to be monitored regularly.

## 3. Prohibited activities

Mirova and its associates, officers, and directors do not engage in prohibited activities. Prohibited activities include offering, promising, or giving (or allowing others to give or accept) any type of advantage, monetary payment, or item of value, either directly or indirectly (via a business partner or any other party), to a public official or any other party in order to:

- influence a business or policy decision,
- cause an individual to act in a disloyal or inappropriate manner,
- obtain an undue advantage.

Mirova's Internal Regulations and Code of Conduct also forbid associates from soliciting or accepting any sort of undue advantage in exchange for completing, or refraining from

completing, a task under their responsibility. Facilitating payments, payments made to public officials in order to facilitate, accelerate, or guarantee that a public decision will be executed, of all amounts are prohibited.

## 4. Practices which increase the risk of corruption

Certain areas can be at an increased risk of corruption. Mirova has put certain measures into place concerning the following areas:

- gifts and invitations to events,
- travel, accommodations, and related expenses,
- conferences and events,
- charitable contributions, donations, and sponsorships,
- relationships with suppliers and other third parties,
- relationships with public officials,
- recruiting practices,
- mergers, acquisitions, and joint ventures,
- accounting.

If alerted to possible corruption, Mirova must verify that there's a legitimate justification for any suspicious activity, evaluate the level of risk, and respond accordingly.

## 5. Lobbying activity

Under the Sapin II Law, Mirova's associates may be considered "lobbyists" and can lobby routinely for Mirova's interests.

Lobbying activities are activities where designated lobbyists influence public policy. Lobbying activities must be reported to the High Authority for transparency in public life and information concerning lobbying activities should be updated regularly.

Lobbyists should conduct themselves with integrity and should observe regulations regarding good conduct.

## 6. Compliance program

Mirova has put into place a program to ensure that it is compliant with all anti-corruption legislation.

Mirova has implemented measures to prevent corruption, including:

- Regular risk mapping
- Policies, procedures, and internal norms
- Training and activities designed to raise awareness,
- An anti-corruption policy for third parties.
- A system for declaring lobbying activities to the High Authority for transparency in public life.

Mirova conducts regular checks to ensure it is compliant with all anti-corruption legislation. Monitoring is increased when an increased risk of corruption is identified through risk mapping. Checks are carried out in order to identify any instances of bribery or other types of corruption.

Mirova has implemented an internal reporting procedure to collect information from employees who witness conduct or situations against the anti-corruption policy.



## **Disclaimer**

This document is provided for information purposes only. No information contained in this document may be interpreted as being contractual in any way. This document is provided for reference only, from sources which Mirova considers reliable. Mirova reserves the right to modify any information contained in this document at any time without notice. Mirova cannot be held responsible for any decisions made on the basis of the information contained in this document, nor can it be held responsible for the use of this document by a third party.

### **MIROVA**

Asset Management company - Limited liability company  
RCS Paris n°394 648 216 - Regulated by AMF n° GP 02-014  
59, Avenue Pierre Mendès France – 75013 – Paris  
Mirova is an affiliate of Natixis Investment Managers

### **NATIXIS INVESTMENT MANAGERS**

Limited liability company  
RCS Paris 453 952 681  
43, avenue Pierre Mendès France – 75013 – Paris  
Natixis Investment Managers is a subsidiary of Natixis

### **NATIXIS INVESTMENT MANAGERS INTERNATIONAL**

Asset Management company - Limited liability company  
RCS Paris n°329 450 738 - Regulated by AMF n° GP 90-009  
43, avenue Pierre Mendès France – 75013 – Paris  
Natixis Investment Managers International is an affiliate of Natixis Investment Managers

### **MIROVA U.S.**

888 Boylston Street, Boston, MA 02199. Tel: 212-632-2800  
Mirova US is a subsidiary of Natixis Investment Managers International based in the United States, and indirectly owned by Natixis Investments Managers, including direct minority detention by Mirova. Mirova is operated in the U.S. through Natixis AM US. Natixis AM US and Mirova entered into an agreement whereby Mirova provides Natixis AM US investment and research expertise. which Natixis AM US then combines with its own expertise. and services from Natixis Asset

An affiliate of: