Regulatory Information

Conflicts of Interest Policy

The duty of Edmond de Rothschild Asset Management (France) has always been to place the interests of our clients above all other considerations. For this reason, we are committed to detecting and preventing any conflict of interest that may arise in the course of providing our investment and related services to you.

With this in mind, we have set up an organization, a dedicated procedure, and measures enabling us to identify and manage any such situations as effectively as possible.

We undertake to inform you of the general nature or source of the conflict(s) of interest should such a situation be identified.

Details of our Conflicts of Interest Policy

Further information on our conflicts of interest policy is available on request.

Best Execution Policy – Best Selection Policy

Directive 2004/39/EC on Markets in Financial Instruments stipulates that, as of November 1, 2007, when executing an order on behalf of a client relating to a financial instrument, an investment services provider must take all reasonable steps to obtain the best execution of the client's order, in particular by implementing a Best Execution Policy and a Best Selection Policy for intermediaries (together the "Policy"). The Policy is reviewed by Edmond de Rothschild Asset Management (France) as required and at least once a year.

Details of our Best Selection and Execution Policy

Risk Mapping

In accordance with regulations, Edmond de Rothschild Asset Management (France) has drawn up a general description of the nature and risks of financial instruments, which explains the specific characteristics of the particular type of financial instrument concerned, and the risks associated with it, in order to enable an investment decision to be taken with full knowledge of the facts.

Risk mapping by financial instrument

Report on Edmond de Rothschild Asset Management (France) Intermediation Fees

In accordance with regulations, Edmond de Rothschild Asset Management (France) has drawn up an annual report on intermediation fees.

Report on intermediation fees – Edmond de Rothschild Asset Management (France)

Remuneration Policy

Edmond de Rothschild Asset Management (France) has implemented a remuneration policy that complies with the provisions of European directives 2011/61/EU (known as the "AIFM Directive") and 2014/91/EU (known as the "UCITS V Directive").

Remuneration policy – Edmond de Rothschild Asset Management (France)

Withholding Tax Claims Policy

French UCIs have, in the past, received dividends from foreign equities on which the issuer's state of domicile may have levied a withholding tax. In some cases, it may turn out that the withholding tax rate applied to dividends received by French UCIs is different from that applied to dividends paid to UCIs located in the same state as the issuer of the security. On May 10, 2012, the Court of Justice of the European Union (CJEU) issued a ruling condemning withholding taxes of such a discriminatory nature. This ruling allows UCIs to bring actions for restitution of part of past withholding taxes with the tax authorities of the countries concerned.
Edmond de Rothschild Asset Management (France) has drawn up a preliminary diagnosis to identify claims with a chance of success, based on objective criteria (materiality threshold). On the basis of these criteria, the management company has decided to file with the relevant tax authorities (notably Germany, Denmark, Spain, Finland, Italy, the Netherlands, Poland and Sweden), on behalf of the portfolios concerned and in the interest of unitholders, withholding tax claims for the years 2009 to 2014. However, it should be noted that this claims policy is subject to uncertainties, particularly in terms of the actual and definitive amounts reimbursed, and delays that can extend over several years. What's more, given the amounts at stake at the level of the States concerned, some States are likely not to apply the CJEU ruling diligently, or to try to introduce additional formal or substantive conditions. As a result, external costs may be incurred without benefiting from the expected reimbursements. Further information on this procedure is available on request.

Handling of Claims

In the event of a problem or dispute regarding an investment service provided by Edmond de Rothschild Asset Management (France), you may, by any means convenient to you, either contact your usual representative or send a letter to the Client Service Department of Edmond de Rothschild Asset Management (France), 47 rue du Faubourg Saint-Honoré - 75401 PARIS Cedex 08.

As of the date your complaint was sent, you will receive:
— A confirmation of receipt within ten business days, unless a response is provided in the meantime;
— A response within a maximum of two months.

However, if you are not satisfied with the response or if your issue persists, you may also contact the Ombudsman of the Autorité des marchés financiers by writing to the following address: Autorité des marchés financiers - AMF Ombudsman - 17 place de la Bourse - 75082 PARIS Cedex 02. For more information: www.amf-france.org.

Processing of Personal Data

Personal information collected in connection with an investment service will be processed automatically by Edmond de Rothschild Asset Management (France), the data controller, whose contact details are Service Clients 47 rue du Faubourg Saint-Honoré - 75008 Paris ("clientservice-am-fr@edr.com") and whose Data Protection Officer's contact details are DPO Edmond de Rothschild Asset Management (France), 47, rue du Faubourg Saint Honoré
- 75008 Paris (DPO@edr.com). This processing is necessary for the performance of an investment service and to comply with the legal and regulatory obligations of Edmond de Rothschild Asset Management (France).
The information collected is mandatory for the performance of an investment service. Failure to provide this information will result in the termination of any investment service.
The recipient of this data is Edmond de Rothschild Asset Management (France). The data collected may be transferred to entities of the Edmond de Rothschild group or to third party subcontractors or partners located in France, in States belonging to the European Union or in Switzerland (it being specified that the European Commission has noted by way of decision no. 2000/518/EC of July 26, 2000 that this third country ensures an adequate level of protection) for the requirements of the exercise of the investment service as well as for the execution of the policy of prevention and management of conflicts of interest of Edmond de Rothschild Asset Management (France), or to meet its legal and regulatory obligations, provided that such communication is limited to those persons who need to know said data. This data will be kept in accordance with the various applicable limitation periods, i.e. for five years after the end of the relationship, in the absence of shorter or longer periods specifically provided for.
The Data Subject has the right to ask the data controller for access to the personal data concerning him or her, for rectification or erasure of such data, for a restriction on the processing of such personal data, and for the right to object to the processing and portability of his or her data. Exercising the right to object to data processing will result in the termination of the investment service. The Data Subject also has the right to define directives concerning the fate of his/her

personal data post-mortem. In the event of dissatisfaction with the processing of personal data, customers may lodge a complaint with the Commission Nationale de l'Informatique et des Libertés (C.N.I.L) at the following address: 3 Place de Fontenoy, TSA 80715 - 75334 Paris Cedex 07 - 01 53 73 22 22.

Personal data protection charter

Shareholder Engagement Policy

The shareholder engagement policy applied by Edmond de Rothschild Asset Management (France) to its portfolio management activities on behalf of third parties can be consulted by clicking on the following link.

The annual report on the implementation of this policy can also be consulted via this link.

Summary of Key Investors Rights

The summary of the main investor rights under the provisions of REGULATION (EU) 2019/1156 aimed at facilitating the cross-border distribution of UCIs can be consulted by clicking on the following link.

Summary of main investor rights