

Order execution policy and guidelines for the selection of intermediaries and counterparties

Introduction: Guidelines adopted by Natixis Asset Management

As professionals in the field of third-party asset management, we at Natixis Asset Management must ensure complete independence in the performance of our duties, which we conduct in the exclusive interest of our clients.

- Pursuant to the Markets in Financial Instruments Directive (MiFID), Natixis Asset Management has committed to observe the following guidelines:
 - Respect for market integrity, transparency and security;
 - Compliance with all regulations applicable to asset management professionals as well as the general best practice guidelines defined by the profession;
 - Respect for the primacy of clients' interests.
- This policy document provides an overview of Natixis Asset Management's overall organization as well as a description of the ground rules that it applies systematically for the selection of intermediaries and the execution of orders on behalf of third parties, in accordance with the Markets in Financial Instruments Directive (MiFID) and the General Regulations of the Autorité des Marchés Financiers (AMF General Regulations). These guidelines do not apply to the structuring of specific products (for example, formula-based funds).
- This policy applies when the management company manages portfolios directly.
- The policy is subject to change at any time and without prior notice.

It is available on Natixis Asset Management's website at the following address:

www.am.natixis.com/fr-FR/A-propos-de-Natixis/Engagements/Engagements-de-gouvernance-et-de-compliance.

This policy document is also available from the Customer Services Department. Requests can be sent by email to nam-service-clients@am.natixis.com or by post to: NATIXIS ASSET MANAGEMENT - « Services Clients » - 21 quai d'Austerlitz - 75634 PARIS Cedex 13

This policy applies to Natixis Asset Management's professional and non-professional clients within the meaning of the MiFID.

Organization of Natixis Asset Management

Pursuant to the Markets in Financial Instruments Directive (MiFID), Natixis Asset Management has set up procedures with a view to securing the best possible result for its clients during the order execution process.

Natixis Asset Management has opted for the "professional client" status in its dealings with intermediaries and counterparties.

• Products involved

These procedures apply to all financial instruments ¹covered by MiFID.

• Order handling

Natixis Asset Management takes all reasonable steps to ensure that the financial instruments are promptly and correctly delivered to the portfolio account of the appropriate client.

Natixis Asset Management decides the allocation of the orders it plans to place beforehand. As soon as it is informed that said orders have been executed,

¹ Article L. 211-1 of the French Monetary and Financial Code

Natixis Asset Management informs the depositary or account holder of the precise and final allocation to the beneficiaries of the executed orders.

• **Selection of Intermediaries**

As part of its portfolio management business, Natixis Asset Management places orders on behalf of the portfolios that it manages. Natixis Asset Management sends almost all of the orders resulting from management decisions involving financial instruments to Natixis Asset Management Finance, a Natixis Asset Management subsidiary accredited by the competent French regulatory authority, the Comité des Etablissements de Crédit et des Entreprises d'Investissement (CECEI), as a banking and investment services provider. Natixis Asset Management may at any time request Natixis Asset Management Finance to treat it as a non-professional client and thus benefit from higher protection. In this respect, the paramount consideration will be the total cost representing the price of the instrument or the financial contract plus all execution-related costs.

Natixis Asset Management can also submit its orders directly to accredited intermediaries.

Where this is the case, intermediaries or counterparties are selected on the basis of objective criteria, using a specific procedure involving in particular the approval of our Risk and Compliance department.

Natixis Asset Management considers the following criteria, among others: price, liquidity, speed, and execution probability.

Natixis Asset Management relies on providers of execution or investment decision-making support services and compensates these providers either directly or via fee-sharing arrangements.

- **Aggregated orders**

Natixis Asset Management may aggregate the orders of several clients in accordance with Article 314-67 of the AMF General Regulations.

- **Instructions received from clients**

In cases where a client gives instructions relating to order execution arrangements, broker selection, or only a part or a specific aspect of the order, Natixis Asset Management may not be able to secure the best execution.

- **Main trading venues**

Orders can be executed in regulated markets, multilateral trading facilities (MTFs), or with systematic internalisers (SIs) and market makers.


In the event that orders relating to financial instruments admitted to trading on a regulated market should be executed outside of regulated markets or multilateral trading facilities, the client's prior consent will be requested.

- **Monitoring intermediaries and counterparties**

Natixis Asset Management has set up procedures to monitor intermediaries and counterparties and conducts an annual review of its execution policy on the one hand and of its intermediaries and counterparties on the other. A review is also conducted whenever a significant change occurs that could possibly impair its ability to secure the best possible result for its clients.

As necessary, Natixis Asset Management takes the appropriate remedial action to address any deficiencies discovered during said review.

Best execution and/or best selection may not necessarily apply to each individual transaction (on a line-by-line basis), but are assessed on the basis of



all transactions over a set period of time in accordance with the order execution policy described in this document.

Natixis Asset Management has evidence of best execution for the orders executed by Natixis Asset Management Finance, which is available in the form of disclosures and reports.

With respect to orders transmitted by Natixis Asset Management to Natixis Asset Management Finance, the latter applies its own order execution policy, which notably provides for access to a variety of execution venues.