

## COMMUNICATION FROM AMUNDI TO DISCLOSING MARKET PARTICIPANTS (« DMPs »)

### PUBLISHED ON THE WEBSITE

Amundi Asset Management (“Amundi”) can participate in market soundings under certain conditions, listed below and underpinned by the various regulations relating to the prevention of Market Abuse.

**Under no circumstances should disclosing market participants (“DMP”) contact an Amundi’s collaborator directly – only the below distribution lists, targeting the various relevant investment expertises, must be contacted in the first place. Amundi’s designated coordinators will then assess your proposal based on the first set of information provided according to the below principles.**

- Expertise Equity: ECMdesk.Amundi [at] amundi.com
- Expertise ABS: secured.assets [at] amundi.com
- Expertise Fixed Income: G-UESAMUNDI-GES-TEC-AFE-MSA [at] rc-its.credit-agricole.fr
- Expertise Money Market: G-UESAMUNDI-GES-LIQ-ISM [at] rc-its.credit-agricole.fr
- Expertise European HY expertise: G-UESAMUNDI-GES-TEC-AFE-CRC-CHY [at] rc-its.credit-agricole.fr

#### 1. Amundi Interests

Amundi wished to be approached only for the following types of operations:

##### Equity expertise:

No restriction

##### ABS expertise:

Counterparty acting under mandate	
Type of issuers	Non-frequent issuer (max 1 public bond)
Deal size	Min 50M€
Number of book runners	NA
Rating	IG HY or Non-Rated
Region	NA
Currency	€
Coupon structure	Fixed or Float
Maturity or WA Life	Max 15Yrs

##### Fixed Income expertise (ex European HY)

Counterparty acting under mandate	
Type of issuers	Non-frequent issuer (max 1 public bond)
Min issuer turnover €	750M€
Deal size	Min 50M€
Number of book runners	NA
Rating	IG HY or Non-Rated
Region	NA
Currency	€
Coupon structure	Fixed or Float
Maturity or WA Life	Max 15Yrs

## European HY expertise:

Counterparty acting under mandate	
Type of issuers	High Yield
Deal size	Min 250M€
Number of book runners	NA
Rating	European HY issuer
Region	NA
Currency	€ or GBP
Coupon structure	Fixed or Float
Maturity or WA Life	NA

## Money market expertise:

Counterparty acting under mandate	
Rating	Investment Grade
Region	All excluding Middle East
Deal size	> 500 millions
Number of book runners	Min 5
Currency	EURO
Coupon structure	Fixed rated for < 1year or FRN > 1year
Maturity	Max 2 years

## 2. DMP approach

### 1.1. Initial communication from the DMP to Amundi's coordinators

The initial communication sent to the relevant Amundi's distribution list should include the following<sup>1</sup> :

- a) A statement clarifying that the communication takes place for the purposes of a market sounding and the confirmation that the DMP is duly mandated by the issuer ;
- b) where the market sounding is conducted by recorded phone lines with audio/video recording being used, a statement indicating that the conversation will be recorded and that the consent of Amundi is required ;
- c) A **high level** description of the expected operation: the information transmitted initially must be carried out on a no name basis, avoiding too many details, including only **generic** or **contextual** elements that are unlikely to initiate the coordinator unintentionally. The generic elements that could be transmitted initially are below, split by expertise:

Expertise	Generic information to be provided	
Equity	No special need	
Fixed Income	Type of issuers	
	Min issuer turnover €	

<sup>1</sup> Reference : Article 3 of Delegated Regulation (EU) 2016/960 of May 17, 2016.

	Deal size	
	Number of book runners	
	Rating	
	Region	
	Currency	
<b>Money Market</b>	Rating	
	Region	
	Deal Size	
	Number of book runners	
	Maturity	
	Currency	
	Coupon structure	

- d) The mention that before disclosing any additional information, an explicit consent from Amundi is required and a statement clarifying that this agreement will lead to the receiving of information that the DMP has analyzed as inside information (or not) ;
- e) A reference to the obligation for Amundi, laid down in Article 11 paragraph 7 of Regulation (EU) 596/2014, to self-assess whether the information they receive amounts to inside information or not ;
- f) A reminder that obligations and prohibitions apply in the event of the possession of inside information and that there is a risk of civil or administrative and penalties associated to the breaching of these obligations ;
- g) Where possible, communicate an estimate of when the information will cease to be inside information, the factors likely to modify this estimate and information on how Amundi will be informed of any change in this estimate.

## 1.2. Process for the delivering of market sounding information

Once the prior agreements have been granted to the DMP (consent to receive privileged information or not, registration agreement), the coordinator will provide the DMP with the principal portfolio manager / analyst's contact details, as well as the potentially interested managers'.

The information to which the market sounding relates to must be delivered by the DMP only to the persons whose contact details have been provided by the coordinator.

## 1.3. Cleansing of the operation

When the DMP have determined that the inside information disclosed as part of the market sounding has ceased to be inside information, they provide the Amundi coordinator with the following information:

- a) Reminder of their identity;
- b) Identification of the transaction being the subject of the market sounding;
- c) Date and time the market sounding was conducted;
- d) The fact that the disclosed information has ceased to be inside information;
- e) The date the information ceased to be inside information.

## 3. Procedure for unrecorded communications

Where information is exchanged during meetings or through unrecorded telephone conversations, the minutes or notes relating to these communications must be written up by the DMP and duly signed by the latter, and by the principal portfolio manager / analyst to whom a copy of these notes will be sent.

Amundi must then, within 5 days:

- Sign these reports if they agree to their contents;
- Provide their own version if they do not.

#### **4. No future solicitations**

The DMP establishes and maintains a list of investors who have mentioned to him that they do not wish to be contacted for market soundings any longer. The DMP makes sure that the investors on this list are indeed no longer part of the market soundings they carry out.

*Amundi Asset Management, French " Société par actions simplifiée" (SAS)  
Portfolio management company approved by the French Financial Markets Authority (Autorité des Marchés Financiers) under  
no.GP 04000036.  
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