

# **CM-AM CASH ISR**

# **PROSPECTUS**

A UCITS compliant with European Directive 2009/65/EU.

# I - GENERAL CHARACTERISTICS

I-1 Form of the UCIT

Name:

CM-AM CASH SRI

▶ Legal form of and Member State in which the UCITS was incorporated:

French mutual fund (FCP)

- ▶ Date of creation and expected duration of existence: The fund was approved on 07 January 2022 and formed on 18 February 2022 for a term of 99 years.
- ► Summary of the management offer:

ISIN code	Allocation of distributable amounts	Currency	Initial net asset value	Eligible investors	Minimum initial subscription amount*
Unit IC: FR0000979825	Accumulation	Euro	152,449 euros	All investors	1 unit
Unit ID: FR0010948190	Distribution of net income	Euro	495,384.69 euros	All investors	1 unit
Unit ES: FR0013258886	Accumulation	Euro	100,000 euros	Unit intended for feeder fund of CM-AM CASH ISR.	1 unit
Unit RC: FR0013353828	Accumulation	Euro	51,832.71 euros	All investors	1 millionth of a unit
<u>Unit</u> RC2: FR0013400546	Accumulation	Euro	10 euros	Portion reserved for Milleis Banque clients	1 millionth of a unit
Unit S: FR001400DG78	Total accumulation	Euro	100,000 euros	All investors, particularly those subscribing via distributors/intermediaries providing a third-party management service or receiving fee-based advice without retrocession	1 unit (except for UCIs managed by Crédit Mutuel Asset Management: one millionth of a unit)

<sup>\*</sup> With the exception of UCIs managed by the asset management company.

▶ Indication of where the fund rules, the latest annual report and the latest periodic statement may be obtained, if not attached:

The latest annual documents, together with the composition of the assets, will be sent within 8 working days on written request by the shareholder to:

CREDIT MUTUEL ASSET MANAGEMENT Service Marketing et Communication 4, rue Gaillon – 75002 PARIS

I-2 Service providers

▶ Asset Management Company: CREDIT MUTUEL ASSET MANAGEMENT - 4, , rue Gaillon - 75002 Paris, France. A French "Société Anonyme" company approved by the Commission des Opérations de Bourse (now the Autorité des Marchés Financiers - AMF) and registered under No. GP 97-138.

The management company manages the fund's assets in the exclusive interest of its unit-holders. In accordance with the applicable regulations, the management company has the financial, technical and human resources that are necessary to conduct its business effectively.

#### **▶** Depositary and custodian:

# BANQUE FEDERATIVE DU CREDIT MUTUEL (BFCM) - 4 rue Frédéric-Guillaume RAIFFEISEN - 67000 STRASBOURG

The duties of the custodian cover the safekeeping of assets, ensuring that the decisions taken by the management company are in order, monitoring liquidity flows, and maintaining liabilities on behalf of the management company. The depositary's functions include the custody of assets, verifying that the asset management company's decisions comply with regulations, monitoring the fund's cash flows, and, by delegation, serving as the fund's transfer agent and registrar. The depositary will delegate the custody of assets held abroad to one or more local sub-custodians.

BFCM will serve as the fund's depositary and the custodian of its assets and will be responsible for the processing of subscription and redemption orders by delegation. BFCM will also keep the register of the fund's shares.

- a) Assignments:
  - 1. Depositary and custodial:
    - i. Custody of assets
    - ii. Registrar services
  - 2. Monitoring the compliance of the management company's decisions
  - 3. Monitoring fund cash flows
  - 4. Transfer agency services by delegation
    - i. Processing of subscription and redemption orders
    - ii. Keeping of the issuance register.

Potential conflicts of interest: the policy for dealing with conflicts of interests is available on BFCM's website: http://www.bfcm.creditmutuel.fr/

A paper copy of this list may be obtained free of charge from: BANQUE FEDERATIVE DU CREDIT MUTUEL (BFCM)

b) Delegated custodian: BFCM

The list of delegates and sub-delegates is available at: http://www.bfcm.creditmutuel.fr/

A paper copy of this list may be obtained free of charge from: BANQUE FEDERATIVE DU CREDIT MUTUEL (BFCM)

- c) Updated information is available to investors on request from: BANQUE FEDERATIVE DU CREDIT MUTUEL (BFCM)
- ► Establishment in charge of centralising subscription and redemption orders Establishment in charge of keeping the registers of units or shares by delegation (liabilities of the UCITS):

  BANQUE FEDERATIVE DU CREDIT MUTUEL (BFCM)

The Depositary is also responsible for maintaining the liabilities, on behalf of the Management Company, in particular centralising subscription and redemption orders and maintaining the share registers.

#### **▶** Statutory Auditors:

MAZARS - 61 rue Henri Regnault - 92075 PARIS LA DEFENSE

The Auditor certifies the accuracy and reliability of the fund's accounts. It checks the composition of net assets and financial and accounting information before publication.

## ► Accounting management delegate:

CREDIT INDUSTRIEL ET COMMERCIAL (CIC)

6, Avenue de Provence, 75009 PARIS

▶ **Distributors**: Banques et Caisses de Crédit Mutuel Alliance Fédérale and related entities.

► Advisors: N/A

# II - FUND OPERATION AND MANAGEMENT

## **II-1 General characteristics:**

# ▶ Unit characteristics:

- ISIN code "IC" unit: FR0000979825
- ISIN code "ID" unit: FR0010948190
- ISIN code "ES" unit: FR0013258886
- ISIN code "RC" unit: FR0013353828
- ISIN code "RC 2" unit: FR0013400546
- ISIN code "S" unit: FR001400DG78

#### • Nature of the rights attached to the units:

Each unit-holder has a co-ownership right to the fund's assets that is proportional to the number of units held.

# • Entry in a register:

If units are held in bearer form, the unit-holder's rights are recorded in a personal account with the intermediary of their choice. If held in registered form, the unit-holder's account will be kept either by the fund or by an intermediary selected by the unit-holder.

#### • Liability management:

The depositary is the fund's registrar. Euroclear France is responsible for the administration of the fund's shares.

## • Voting rights:

Since the fund is an FCP fund, the units carry no voting rights and all decisions are taken by the management company. Information concerning the fund will be notified to unit-holders either individually, through the press, via periodic documents or some other means.

#### • Form in which units are held: Bearer

#### Decimalisation:

Units are expressed in fractions of one-thousandth. The RC, RC2 and S units are expressed in millionths

#### ▶ Closing date: last day of trading on the Paris stock exchange in March

Closing date of first financial year: last day of trading on the Paris stock exchange in March 2022

### **▶** Details on the tax system:

The fund is not subject to corporation tax and unit-holders enjoy tax transparency.

Depending on the unit-holder's tax regime, the income and capital gains obtained from the fund's units may be subject to taxation.

If prospective investors have a question about their tax situation, they should contact a tax advisor.

#### **II-2 Specific characteristics**

▶ ISIN code "IC" unit: FR0000979825 ISIN code "ID" unit: FR001094819 ISIN code "ES" unit: FR0013258886 ISIN code "RC" unit: FR0013353828 ISIN code "RC 2" unit: FR0013400546 ISIN code "S" unit: FR001400DG78

▶ Classification: Standard variable net asset value (VNAV) money market funds

Fund of fund: Up to 10% of net assets

► MMF approval date: 22/01/2019

## Management objective:

This Fund is actively managed on a discretionary basis in compliance with a qualitative extra-financial filter in accordance with the policy implemented by Crédit Mutuel Asset Management and in compliance with the requirements of the French SRI label.

It is management objective is to achieve a return (net of fees applicable for the particular unit class) that outperforms its benchmark index, which is the Compounded €STR over the recommended investment period.

In the event of particularly low, negative or volatile interest rates, the net asset value of the Fund may fall structurally, which could have a negative impact on the performance of your Fund and compromise the management objective of capital preservation.

## **▶** Benchmark:

**COMPOUNDED €STR:** The Euro Short-Term Rate (€STR) tracks the overnight borrowing rate of the eurozone interbank market. It is published every market trading day (Target 2) by the ECB and is based on the previous day's trading.

The compounded €STR index is calculated to reflect the reinvestment of interest. Additional information about this index is available on the administrator's website: https://www.ecb.europa.eu/stats/financial\_markets\_and\_interest\_rates/euro\_short-term\_rate/html/index.en.html

The European Central Bank, which is the administrator of the €STR benchmark index, is exempted from Article 2.2 the Benchmark Regulation since it is a central bank, and therefore does not have to be registered in ESMA's register.

Pursuant to European Parliament and Council Regulation 2016/1011 of 8 June 2016, the Management Company has a procedure for monitoring the benchmark indices used that specifies the measures to be implemented if an index is substantially modified or is no longer provided.

The fund's benchmark index does not assess or include environmental and/or social characteristics in its constituents and is therefore not aligned with the ESG characteristics promoted by the portfolio.

## Investment strategy:

# 1 - Strategies employed

The Fund adopts an active management style to achieve a return close to that of the money market, with market risk comparable to that of its benchmark index, while maintaining regular increases in net asset value.

The Fund's investment strategy, as described below, incorporates extra-financial criteria using a methodology developed by Crédit Mutuel Asset Management's analysis department, aimed at excluding stocks with the lowest environmental, social and governance ratings in order to reduce the impact of the sustainability risk to which the Fund is exposed and which is defined in the "Risk profile" section.

This reduces the sustainability risk to which the Fund is exposed.

The fund incorporates environmental, social and governance criteria (ESG) as per Article 8 of Regulation (EU) 2019/2088, known as the "Sustainable Finance Disclosure Regulation" (SFDR).

In its investment decisions, the management team endeavours to take account of the European Union's criteria for economic activities considered to be sustainable under the "Taxonomy" regulation (EU) 2020/852. Based on the issuer data currently available, the minimum percentage of alignment with the European Union Taxonomy is 0%.

The main negative impacts are also taken into account in the investment strategy.

Crédit Mutuel Asset Management applies the same principles to its entire range of UCIs:

- a controversy-monitoring policy for detecting companies that become involved in controversies. Stocks may be put on a watch list or excluded, depending on the results of the analysis.
- a policy of strict specific CM AM sector-based exclusion involving, in particular, controversial and non-conventional weapons and coal.

The controversy monitoring and sector exclusion policies are available on Crédit Mutuel Asset Management's website.

The principle of "cause no significant harm" applies only to investments underlying the financial product that take into account the European Union's criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the European Union's criteria for environmentally sustainable economic activities.

To ensure that the Fund's investments do not significantly undermine its sustainable investment objectives, the management team's approach is to exclude issuers with ESG classifications 1 and 2, as described below, from the investment universe.

The Fund's strategy is based on a selective approach that favours the highest-rated issuers or those demonstrating good prospects for their environmental, social and governance (ESG) practices, and excludes issuers with ESG risks.

The universe of eligible issuers includes OECD companies issuing debt securities. Within this universe, eligible instruments are money market instruments that meet the criteria of Regulation (EU) 2017/1131 on money market funds (MMFs) and term deposits from credit institutions.

The management process can be broken down into the three stages:

**Etape 1. ESG filter**: reduction of the initial universe by at least 20%, based on the ESG stock selection process described below (including controversy monitoring)

ESG analysis according to Crédit Mutuel Asset Management's philosophy is based on 5 independent and complementary pillars:

- Social (e.g. gender equality)
- o Environmental (e.g. reducing the volume of waste produced and greenhouse gas emissions)
- o Economic and societal (e.g. compliance with the professional code of ethics)
- o Corporate governance (e.g. number of independent directors on boards)
- o The company's commitment to a socially responsible approach (e.g. the quality of its CSR reporting).

The methodology (monitoring and data collection) is based on indicators in 15 categories reflecting the global approach adopted by Crédit Mutuel Asset Management, covering all quality of governance, societal, social and environmental criteria.

For example, Pillar E: carbon intensity, Pillar S: human resources policy, and Pillar G: proportion of independent directors are included in our ESG categories.

As far as states are concerned, the existence of a legal framework, respect for fundamental freedoms and the conditions of application of international treaties are reference and selection criteria.

Qualitative analysis complements the extra-financial analysis of quantitative data with a view to validating the consistency of the information collected, in particular through interviews with stakeholders.

In particular, this approach aims to assess the company's ability to integrate and innovate on the 5 ESG pillars that make up the stock selection criteria, on a trend basis over at least 3 years.

This stock selection process establishes a score (1 to 10) based on the company's contribution to ESG factors, and then classifies the companies into 5 distinct groups according to their extra-financial performance:

Classification:	Description:
1 = Negative	High ESG risk / potentially frozen assets
2 = Not very involved	More indifferent than opposed

3 = Neutral	Administratively neutral in accordance with sectoral regulations
4 = Committed	Committed to the trajectory Best in Trend
5 = Best-in- class	Real relevance Best-in-class

The fund's ESG investment approach focuses, not exclusively, on the "Committed" and "Best in class" classifications as defined in the table above, as well as on classification 3, which considers a pool of issuers monitored by ESG experts.

The lowest-rated issuers, falling under classifications 1 and 2, are excluded from the Fund universe.

At the same time, Crédit Mutuel Asset Management's Responsible and Sustainable Finance unit has set up a controversy escalation process (analysis and treatment) to monitor the companies concerned and determine whether they should be maintained or excluded. Companies are classified in three categories/colour codes according to the number of controversies, their seriousness, their repetition and their management, particularly in terms of financial impact, with 'red' codes for exclusion, 'orange' for vigilance and 'green' for acceptance.

In addition to legal exclusions, strict sectoral exclusions have been implemented for controversial weapons, non-conventional weapons and coal. The sector exclusion policy is available on Crédit Mutuel Asset Management's website.

The model combines an assessment of the investment risks identified, adjusted for the level of controversy, with an analysis of the positive contribution to sustainable development and social responsibility.

Furthermore, the management team is convinced that improving corporate practices helps to protect the value of investments. It has therefore formalised an approach of dialogue and commitment aimed at improving the consideration of ESG issues (Corporate Responsibility and Sustainable Transition) by the companies in which the fund invests.

The commitment process is based on dialogue with issuers and the monitoring of commitments made and results obtained in Crédit Mutuel Asset Management's proprietary ESG analysis model. Dialogue is at the heart of this approach, which aims to encourage better practices and, more generally, greater transparency on ESG issues.

The extra-financial analysis carried out using the proprietary model leads to the exclusion of at least 20% of the initial investment universe.

**Etape 2.** <u>Financial analysis</u>: This new universe is analysed from a financial point of view (see below) to ensure that only stocks of clearly identified quality are retained:

- Sector analysis including the regulatory framework
- Synthesis of specialised external research,
- Growth & profitability
- Management & strategy
- o Balance sheet quality (debt ratio, liquidity ratio, etc.)
- Valuation

This universe constitutes the list of securities eligible for investment.

When selecting and monitoring debt securities the management company does not automatically or exclusively rely on credit-rating agencies. It mainly relies on its own credit analysis, which ensures that all investment decisions are taken in the interest of shareholders.

# **Etape 3.** Portfolio construction:

**3° Portfolio construction/ - Fixed income component:** This part of the process is based on active management of the average life of securities taking into account any expectations of changes in eurozone central bank interest rates, management of the money market yield curve and management of monthly fluctuations in the €STR as well as defining the classification. The split between variable and fixed rates will change in line with expected changes in interest rates. Credit risk is managed on a day-to-day basis to try to optimise the portfolio's return through a rigorous selection of issuers.

## At least 90% of the securities and UCIs selected by the management team include extra-financial criteria.

The Fund may invest up to 10% of its net assets in securities and units or shares of UCIs that do not include extra-financial criteria. As a result of the financial analysis, companies with the highest ESG ratings are not automatically included in the portfolio.

Instruments issued in currencies other than the euro are systematically hedged against currency risk.

Direct or indirect exposure to equity and commodity risk, even though financial contracts are prohibited.

## 2 - Assets (excluding embedded derivatives)

The fund may invest in the following asset classes:

- Debt securities and money market instruments:

The portfolio consists of money market instruments meeting the criteria of Directive 2017/1131/EC and term deposits with credit institutions. The fund manager ensures that the instruments in the Fund's portfolio are of high credit quality

through the application of a rigorous internal analysis and assessment process by the management company, or by reference, but not exclusively, to the short-term ratings of the ESMA-registered rating agencies which have rated the instrument and which the asset management company deems to be the most relevant, while avoiding any mechanical dependence on these ratings. If the instrument is not rated, the asset management company determines an equivalent quality using an internal process.

A money market instrument is not of high credit quality if it does not have at least one of the two highest short-term ratings determined by the asset management.

In addition, the fund may hold money market instruments issued or guaranteed by a local, regional or central authority of a Member State, the central bank of a Member State, the European Central Bank, the European Union or the European Investment Bank or rated at least Investment Grade according to the analysis of the management company or by reference to agency ratings.

The Fund limits its investments to financial instruments with a maximum residual maturity of 2 years or less, provided that the rate can be revised within a maximum period of 397 days.

The weighted average maturity (WAM) is less than or equal to 6 months. The weighted average life (WAL) of financial instruments is less than or equal to 12 months.

The Fund invests mainly in fixed-rate, floating-rate, revisable or index-linked financial instruments, in compliance with the rating, maturity and life rules defined above: bonds, BTFs, BTANs, BMTNs, EMTNs meeting money market management criteria, Treasury notes, certificates of deposit, Treasury bills and similar securities.

In the event of a downgrade in the rating of fixed income products, particularly in the event of a change in the credit quality or market risk of a security identified by the rating agencies or by the asset management company, the asset management company carries out its own credit analysis to decide whether or not to sell the securities concerned.

By way of exemption, the Fund may invest up to 100% of its assets in various money market instruments issued or guaranteed individually or jointly by the Union, the national, regional or local authorities of the Member States or their central banks, the European Central Bank, the European Investment Fund, the European Stability Mechanism, the European Financial Stability Facility, a central authority (for example: European Central Bank, EU Member States (Germany, France, Italy, Spain etc), CDC, ACOSS, APHP, BPI) or the central bank of a third country (United States, Japan, United Kingdom, Norway, Switzerland, Canada, Australia), the International Monetary Fund, the International Bank for Reconstruction and Development, the Council of Europe Development Bank, the European Bank for Reconstruction and Development, the Bank for International Settlements or any other relevant international financial institution or organisation to which one or more Member States belong (IBRD - WORLD BANK, IMF, African Development Bank, Asian Development Bank).

## Internal credit rating assessment procedure:

# I- Description of the scope of the procedure

## Purpose of the procedure

To enable investment in assets of good credit quality. Only issuers with a positive internal rating, i.e. with one of the 2 best short-term internal ratings, are authorised in money market funds. Only securities from issuers with one of the 2 best short-term internal ratings are authorised in money market funds.

# Scope of application

The procedure is applied systematically to money market instruments.

#### II- Description of participants of the procedure

People in charge of the various tasks

- gather information and implementing the methodology: analysts and Risk Control;
- systematically validate the final assessment of credit quality: Risk Control;
- control the implementation: Permanent Control and Compliance;
- Review/validate methodology: Risk Committee.

The Risk Committee is chaired by the Managing Director of CREDIT MUTUEL ASSET MANAGEMENT, the other full members are senior executives of CREDIT MUTUEL ASSET MANAGEMENT and CREDIT MUTUEL GESTION.

The Risk Department chairs this committee, and is represented by the Risk Director, the Head of Risk Control and the Head of Compliance and Internal Control.

# III- Frequency of assessment

The groups and issuers in the entire management universe of CREDIT MUTUEL ASSET MANAGEMENT are analysed and rated at least once a year in accordance with an internal procedure. In the event of an event likely to have a negative impact on credit quality (e.g. a significant deterioration in the operating environment, a major acquisition, etc.), credit quality is systematically reviewed.

# IV- Description of the input and output parameters of the procedure

The internal rating is based on the following elements:

- Quantitative aspects:
  - o The financial profile of a group of issuers based on its financial data
  - Information on bond and CDS prices
  - o Failure statistics
  - Financial indices
- Qualitative aspects: this section assesses an issuer's operational profile based on a set of criteria that make it possible to
  measure, among other things, the economic and regulatory environment, external support, and the positioning and quality of
  the issuer's management.
- Sectoral aspects: this block assesses the risk of the sector in which the issuer operates, based on criteria such as the intensity
  of competition, market concentration and profitability.
- adjustment factors: this block is used to adjust the rating when it is not sufficiently representative of the issuer's credit risk (major event impacting credit quality, etc.).
- Type of transmitter
- The liquidity profile of the instrument
- The asset class to which the instrument belongs

Issuers are analysed mainly on the basis of publicly available documents and information. Other sources of information can also be used:

- External credit analyses (S&P, Moody's) within the framework of subscriptions for the supply of credit ratings as well as databases of financial data;
- Documents obtained during investor presentations;
- Trade union websites;
- Press articles:
- Internal mobility;
- Information from Bloomberg, Thomson Reuters.

The result of the model is a score which is converted into a rating.

# V- Description of methodology

#### Corporates

The internal score grid is based on the following elements:

- Sectoral Risk: this block assesses the risk of the sector in which the issuer operates, based on criteria such as the intensity of competition, profitability outlook, volatility of margins, market growth.
- Operational risk (excluding sector risk): this is made up of a number of criteria used to assess the issuer's level of competitiveness (market positioning, geographical diversification, etc.) and the expertise of its management.
- Financial risk: this covers all quantitative criteria based on the issuer's financial data (various ratios calculated from the balance sheet and income statement).
- Adjustment: this block is used to adjust the automatic rating resulting from the rating model when it is not sufficiently
  representative of the issuer's risk. In particular, the rating may be adjusted according to the strategic nature of the business
  and/or the shareholder's support capacity, especially when the shareholder is a government. Other factors such as the
  capacity to absorb shocks, the issuer's relationship with its banks, market perception or the issuer's management of financial
  risk may also be taken into account to adjust the rating.

Each criterion is rated from 1 to 5 (very weak to very strong) and weighted to obtain a score that is converted into a short-term internal rating. The weightings were determined by a group of experts on the basis of the ACPR's recommendations, advice from Standard & Poor's and an analysis of the practices of Moody's.

An analysis of various market data (CDS, bond prices, financial indices, etc.) is used to refine the ratings using monitoring.

Occasionally, and for reasons that are always justified by the analyst, the rating may be adjusted upwards or downwards.

## Sovereign members of the EU

Internal ratings are the transposition of external ratings issued by reference agencies: Standard & Poor's, Moody's and Fitch. The external rating used is the lower of the two best external ratings from the reference agencies. It is then transposed into internal notation according to a correspondence table. Special cases: when there are only two external ratings, the lower of the two is used for transposition. Where there is only one external rating, this is used for transposition.

Occasionally, and for reasons that are always justified by the analyst, the rating may be adjusted upwards or downwards.

#### Financials

The scoring grid takes into account two main sets of criteria:

- Quantitative criteria, which make it possible to assess a group's financial profile on the basis of its latest financial data (ratios
  calculated mainly on the basis of the balance sheet and income statement + prudential ratios).
- Qualitative criteria to measure, among other things, the economic and regulatory environment, external support, and the
  positioning and quality of the group's management.

These criteria are all assessed on a scale from 5 (very good) to 1 (poor). The weightings of the various criteria and families of criteria reflect their relative importance in the analysis of the entity's credit risk.

In accordance with the classic "CAMEL" financial analysis model, the key ratios have been selected from the following four families:

- Profitability
- Capital:
- Risks
- Refinancing and Liquidity

The four main families of ratios are supplemented by a number of indicators reflecting trends in key aggregates:

- Current profit trend
- GNP trend
- Growth of assets

The weighting of each ratio within its family is defined according to its level of importance, its degree and its quality of information in the various sources at our disposal.

For banks, particular attention is being paid to their appetite for market activities, which are a potential source of earnings volatility. This criterion will be assessed by analysing the following ratios:

- Net trading income/GNP
- Maximum or average total VaR/Equity
- Results of stress scenarios carried out by the bank
- Assessment of market risk exposure and management

The quantitative ratios in the grid do not always give a good indication of the quality of the bank's liquidity and refinancing. A more qualitative assessment criterion for these elements completes the set of ratios.

The score for 'overall liquidity management' is based on an assessment of the following points:

- Quality of primary liquidity: ability to cover short-term debt with rapidly available and fully negotiable assets.
- Easy access to refinancing on the markets:
  - Existence and capacity of the market to ensure liquidity;
  - Quality and stability of market reputation;
  - o Amount of confirmed bank lines granted by Investment Grade banks;
  - Diversification of resources by maturity and type (ability to use alternative sources of refinancing such as covered bonds).
- Quality of asset/liability management and liquidity management: existence of appropriate procedures, tools and methods (gap analysis, stress scenarios).

This assessment must be completed by taking into account the regulatory ratios LCR (Liquidity Coverage Ratio) and NSFR (Net Stable Funding Ratio) published by the bank.

For all financial products, the various qualitative criteria are rated from 5 (Very Good) to 1 (Poor) and relate to the following five areas:

- Economic and banking environment
- External support
- Commercial positioning and diversification
- Management, strategy, procedures
- Outlook

A score is obtained by weighting the various quantitative and qualitative elements. It is then converted into an internal short-term rating. An analysis of various market data (CDS, bond prices, financial indices, etc.) is used to refine the ratings using monitoring.

Occasionally, and for reasons that are always justified by the analyst, the rating may be adjusted upwards or downwards.

# VI- Description of the review framework

The procedure for assessing credit quality and the relevance of the model is reviewed annually by the Risk Committee.

In the event of a significant change, the asset management company will modify its system to adapt it as closely as possible to the new situation. Temporarily, the information displayed in the bylaws may not accurately reflect the procedure. In the best interests of unitholders and taking operational constraints into account, the management company will therefore update the description of the procedure as soon as possible.

## - Units or shares in UCITS, AIFs and other investment funds:

The Fund may invest up to 10% of net assets in French or foreign UCITS funds and in French general purpose investment funds (FIVG) that meet the requirements of Article R.214-13 of the French monetary and financial code governed by Regulation (EU) 2017/1131.

These collective investments may be managed by the management company or by an affiliated company.

#### 3- Derivative financial instruments

Type of markets used:

- Regulated markets
- Over-the-counter markets.

# Risks which the fund manager may hedge or seek exposure to:

- Interest rate risk: hedging
- Currency risk: hedging

Within the maturing limits calculation of the weighted average maturity (WAM) and the weighted average life (WAL) and within the overall risk limit, the manager may take positions to hedge interest rate and currency risks.

#### Type of instruments used:

- futures contracts
- options
- swaps
- forward exchange contracts;

The fund manager does not use total return swaps.

#### Strategy for using derivatives to achieve the investment objective:

Derivative financial instruments may be used to:

- adjust the fund's cash position, particularly when it must accommodate a large volume of subscriptions and/or redemptions
- adapt to changes in market conditions, such as a major market movement, or an improvement in liquidity or in the
  effectiveness of derivative instruments.

## Counterparties:

No counterparty has any discretionary power over the composition and management of the portfolio or over the underlying assets of the derivatives. No portfolio transactions require the approval of a counterparty.

#### 4- Securities with embedded derivatives:

## Risks which the fund manager may hedge or seek exposure to:

- Interest rate risk: hedging and/or exposure
- Credit risk: hedging and/or exposure

Within the maturity limits calculation of the weighted average maturity (WAM) of the portfolio and the weighted average life to maturity (WAL), up to 10% of net assets.

#### Type of instruments used:

- callable securities
- putable securities
- structured securities/EMTN

The fund manager may use securities with embedded derivatives in accordance with the management company's programme of operations.

# Strategy for using securities with embedded derivatives to achieve the investment objective:

The fund manager may use securities with embedded derivatives if such securities offer an alternative to other financial instruments or if they have no exact equivalent.

# 5- Deposits:

The fund may make deposits with one or more credit institutions in accordance with the applicable regulatory limits.

#### 6- Cash loans:

N/A

#### 7- Short term securities transactions:

The fund may engage in short term securities transactions for cash management purposes or for investment objectives, while taking risks that are in line with its investment policy.

- Repurchase agreements: the fund may sell securities to another fund or other legal entity for an agreed price. The securities must be returned when the transaction is terminated.

# Possible types of transactions

The fund may engage in the following securities financing transactions:

- reverse repurchase agreements subject to the French Monetary and Financial Code
- repurchase agreements subject to the French Monetary and Financial Code

# Types of trades:

- Cash management

All securities financing transactions will be carried out in accordance with the fund's best interests and must not cause the fund to deviate from its investment objective or take additional risks.

The fund must ensure that it is able to recover any securities that have been temporarily disposed of under a repurchase agreement, and to recover the full cash amount under a reverse repurchase agreement.

## Types of assets that may be traded:

Securities that are eligible pursuant to the investment strategy and money-market instruments (for example: money market instruments such as negotiable debt securities with a positive rating)

## Expected and permissible extent of use:

- Repurchase agreements: The expected level of utilisation is 8% of net assets. The fund reserves the right to use up to 10% of its net assets.
- Repurchase agreements: The expected level of utilisation is 10% of net assets. The fund reserves the right to use up to 100% of its net assets

#### Remuneration:

The fund will be exclusively entitled to any income from the temporary acquisition or disposal of securities.

#### Selection of counterparties:

Counterparties may be selected from any geographic region excluding the emerging countries, provided they have an Investment Grade rating when purchased, as assessed by the management company or a credit-rating agency. They will be selected on the basis of the criteria of the asset management company's evaluation and selection procedure.

#### ► Contract constituting financial guarantees:

When engaging in over-the-counter derivative transactions and short-term securities transactions, the fund may receive financial assets which serve as collateral to reduce its exposure to counterparty risk.

For OTC derivative transactions, this collateral will mainly be in the form of cash or financial securities. For securities financing transactions, it will mainly consist of cash and eligible government bonds.

These bonds must be issued or guaranteed by a central government or local authority of an OECD member country, or by a supranational institution or body of EU, regional or global scope.

All collateral collected must comply with the following principles:

- Liquidity: All securities collateral must be highly liquid and rapidly tradable on a regulated market at a transparent price.
- Transferability: Collateral must be transferable at all times.
- Valuation: All collateral collected must be valued daily at the market price or using a pricing model. A conservative discount or "haircut" will be applied to securities that are significantly volatile or if their credit quality declines.
- Issuer credit quality: All collateral must be of high quality, as determined by the management company.
- Investment of cash collateral: Cash collateral must either be deposited with an eligible entity, invested in premium quality government bonds (with a credit rating that meets the criteria for money market UCITS and/or AIF), invested in money market UCITS and/or AIF, or used for reverse repo transactions with a credit institution.
- Correlation: the issuer of the collateral must be independent of the counterparty.
- Diversification: Exposure to any single issuer must not exceed 15% of net assets.
- Custody: All collateral received must be placed with the Depositary or one of its agents or a third party under its control, or with a third-party depositary subject to prudential supervision and which has no relationship with the provider of the collateral.
- Prohibition on re-using collateral: Non-cash collateral collected may not be sold, reinvested or pledged as collateral.

## ► Risk profile:

Your money will mainly be invested in financial instruments selected by the management company. These instruments will be subject to changes and uncertainties on the markets.

Unit-holders may be exposed to the following risks:

- **Risk of capital loss:** This is the risk that a share may be sold for less than its purchase price. The fund offers no capital guarantee or protection. The capital initially invested is subject to market fluctuations and may therefore not be fully recovered in the event of an unfavourable market development.
- Discretionary management risk: A discretionary investment style involves anticipating the behaviour of equity and/or fixed-income markets, and/or picking stocks. There is therefore a risk that the fund may not always be invested in the best-performing markets or securities. It may therefore not achieve its performance objectives and its net asset value may decline.
- Interest-rate risk: An increase in interest rates could decrease the value of fixed-income instruments and consequently the fund's net asset value.
- Credit risk: If an issuer's credit-worthiness deteriorates or the issuer defaults on its obligation, the value of these securities may decline and cause the net asset value to decline.
- Risk related to the impact of techniques such as derivatives: Market behaviour may adversely affect positions held in derivatives and cause net asset values to decrease significantly over short periods.
- **Counterparty risk:** Counterparty risk is the aggregate risk of all over-the-counter transactions (i.e. financial contracts, securities financing transactions and collateral agreements) with a given counterparty. Counterparty risk measures the risk of loss if the counterparty is unable to meet its contractual obligations prior to the final settlement of the transaction's cash flow. This could adversely affect the net asset value.
- **Legal risk:** There is a risk that contracts with counterparties may be improperly drafted, particularly with regard to the use of efficient portfolio management techniques.

- **Operational risk:** This is the risk that a service provider may improperly execute or fail to execute a securities transaction. This risk only arises when engaging in securities financing transactions.
- Sustainability risk: This is the risk of an environmental, social or governance event or condition the occurrence of which could have a material adverse impact, actual or potential, on the value of an investment.

#### ► Capital guarantee or protection: N/A

## ▶ Eligible Subscribers and profile of the typical investor:

ID units are open to all subscribers, in accordance with the terms set out in the prospectus.

IC units are open to all subscribers, in accordance with the terms set out in the prospectus.

ES units are, according to terms and conditions set out in the prospectus, specifically intended for feeder funds of CM-AM CASH ISR.

RC units are, according to terms and conditions set out in the prospectus, specifically intended for distribution in Spain.

ER units are, according to terms and conditions set out in the prospectus, specifically intended for distribution in Spain.

S units are, according to terms and conditions set out in the prospectus, specifically intended for investors subscribing via distributors/intermediaries providing management services on behalf of third parties or receiving advice on a fee-free basis.

This fund is aimed at investors looking for a very short-term investment for their cash, backed by top-quality issuers.

The maximum amount that can be reasonably invested in this fund depends on each investor's personal situation, which in turn depends on the investor's net worth, current needs, the investment period and the investor's willingness to take risks or preference for prudent investment. Investors are strongly recommended to diversify their investments so as not to limit their exposure to a single fund.

This fund has not been registered with the US Internal Revenue Service pursuant to the US Securities Act of 1933. Its shares may therefore not be offered, sold or held, directly or indirectly, on behalf of or for the benefit of a "S Person," as defined under US regulations and in particular SEC Regulation S (Part 230-17 CFR 230.903), which may be viewed at: http://www.sec.gov/about/laws/secrulesregs.htm.

## ▶ Recommended investment period: More than 7 days.

### ▶ Methods for determining appropriation of amounts available for distribution:

The annual net income is the sum of the interest, arrears, dividends, premiums, bonuses, directors' fees and any other proceeds from the securities in the fund's portfolio, plus any proceeds from sums that were temporarily made available, after deduction of management fees and interest expenses.

Amounts available for distribution consist of:

- 1° Net income plus retained earnings and increased or decreased by the balance of the income adjustment account;
- 2° Realised capital gains, net of fees, less any realised capital losses, net of fees, recorded during the plus any net capital gains of the same kind recorded during previous periods that have not been distributed or accumulated, and plus or minus the balance of the capital gain adjustment account.

# Accumulation (IC, ES, RC, RC 2, S units):

All distributable amounts are accumulated each year.

# **Distribution (ID unit):**

During the financial year, the Management Company may decide to distribute one or more interim dividends, limited to the net income recorded at the date of the decision. The coupon is distributed within 5 months of the end of the period. The choice of whether to accumulate, distribute annually or retain all or part of the distributable amounts rests with the portfolio management company, in accordance with the following table:

		Total accumulation	Partial accumulation	Total distribution	Partial distribution	Total retention	Partial retention
IC wait along	Net income	X					
IC unit class	Realised net capital gains or losses	Х					
ID wit slees	Net income			X			
ID unit class	Realised net capital gains or losses	Х					
"EC" usit	Net income	X					
"ES" unit	Realised net capital gains or losses	Х					

"DO"	Net income	Х			
"RC" unit	Realised net capital gains or losses	Х			
"DOO"	Net income	Х			
"RC2" unit	Realised net capital gains or losses	Х			
"O"	Net income	X			
"S" unit	Realised net capital gains or losses	Х			

#### **▶** Unit characteristics

Subscriptions to a given unit class may be restricted to a specific category of investors on the basis of the objective criteria described in this section, such as the unit's initial net asset value and the minimum amount of the initial subscription.

ID units are open to all subscribers, in accordance with the terms set out in the prospectus.

IC units are open to all subscribers, in accordance with the terms set out in the prospectus.

ES units are, according to terms and conditions set out in the prospectus, specifically intended for feeder fund of CM-AM CASH ISR

RC units are, according to terms and conditions set out in the prospectus, specifically intended for distribution in Spain. ER units are, according to terms and conditions set out in the prospectus, specifically intended for distribution in Spain. S units are, according to terms and conditions set out in the prospectus, specifically intended for investors subscribing via distributors/intermediaries providing management services on behalf of third parties or receiving advice on a fee-free basis.

- Initial net asset value of an IC unit: 152,449 euros.
- Initial net asset value of an ID unit: 495,384.69 euros.
- Initial net asset value of an ES unit: 100,000 euros
- Initial net asset value of a D unit: 51,832.71 euros
- Initial net asset value of a RC 2 unit: 10 euros
- Initial net asset value of a S unit: 100.000 euros

The number of IC and ES units is expressed in thousandths.

The number of RC units is expressed in millionths.

Minimum initial subscription amount for "IC" units: 1 unit (with the exception of the Management Company and UCI managed by it)

Minimum initial subscription amount for "ID" units: 1 unit

Minimum initial subscription amount for "RC" units: 1 millionth of a unit Minimum initial subscription amount for "RC2" units: 1 millionth of a unit Minimum initial subscription amount for "ES and "S" units: 1 unit

(except for CREDIT MUTUEL ASSET MANAGEMENT, which may subscribe for one thousandth of a unit from the first subscription)

Minimum amount of subsequent subscriptions and redemptions of "IC", "ID" and "ES" units: 1 thousandth of a unit Minimum amount of subsequent subscriptions and redemptions of "RC" and "RC2" units 1 millionth of a unit

## ► Subscription and redemption methods:

Subscriptions and redemptions are handled by the fund's depositary: Banque Fédérative du Crédit Mutuel (BFCM).

Subscription orders may be placed for a specific number of shares or a specific amount. Redemption orders must be expressed in shares only.

Subscriptions may be paid for in securities.

Subscription and redemptions orders are processed every business day at 12h00

- Orders received before 12h00 will be executed at that day's net asset value.
- Orders received after 12h00 will be executed at that day's net asset value.

Orders received after 12h00 on a Friday or on a day preceding a bank holiday and/or public holiday in France are executed on the basis of the net asset value on the Friday or on the last working day preceding a bank holiday and/or public holiday in France, and include the coupon for the weekend and/or bank holiday(s) and/or public holiday(s).

Orders will be executed as shown in the table below:

D	D	D: the day the NAV is established <sup>2</sup>	D	D	D
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Subscription orders are processed before 12 noon <sup>1</sup>	Redemption orders are processed before 12 noon1	Orders are executed no later than day D	Publication of net asset value	Subscriptions are settled <sup>1</sup>	Redemptions are settled <sup>1</sup>	
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<sup>1</sup>Unless another cut-off time is agreed with your financial institution.

#### ▶ Date and frequency of net asset value calculation:

The fund's net asset value is calculated every business day, at closing prices, except on a day that the Paris Bourse is closed as per the Euronext SA calendar

## ▶ Dissemination and publication of the net asset value:

It is available from the management company and the delegated financial manager.

#### ► Fees and charges:

# Subscription and redemption fees

Subscription and redemption fees increase the subscription price paid by investors and reduce the redemption price they receive. The fees paid to the UCITS are used to offset the costs incurred by the UCITS to invest or disinvest the assets entrusted to it. Any fees that are not kept by the fund are paid to the management company, distributors, or other service providers.

Fees charged to investors upon subscription or redemption	Base	Maximum fee
Subscription fee not kept by the UCITS	Net asset value × number of units	Units IC, ID, ES, RC, RC 2 and S: N/A
Subscription fee paid to the UCITS	Net asset value × number of units	Units IC, ID, ES, RC, RC 2 and S: N/A
Redemption fee not kept by the UCITS	Net asset value × number of units	Units IC, ID, ES, RC, RC 2 and S: N/A
Redemption fee kept by the UCITS	Net asset value × number of units	Units IC, ID, ES, RC, RC 2 and S: N/A

#### Operating and management fees

These fees include all fees billed directly to the Fund, with the exception of transaction costs.

Operating charges and fees for other services may include the following:

- Fund registration and listing fees
- Client information and distributor expenses
- Depositary fees, legal fees, auditor fees, tax-related fees, and similar
- Costs of regulatory compliance and regulatory reporting
- Operating expenses
- Data expenses
- Know-your-client costs

	Fees and expenses charged to the fund	Base	Maximum fee			
1	Asset management fees	Net assets	Unit "IC", "JD" and "S": Max. 0.48% incl. tax	Unit "ES": Max. 0.13% incl. tax	Unit "RC": Max. 0.63% incl. tax	Unit "RC 2": Max. 0.68% incl. tax
2	Operating charges and fees for other servicesµ	Net assets	Unit "IC", "JD" and "S": Max. 0.02% incl. tax	Unit "ES": Max. 0.02% incl. tax	Unit "RC": Max. 0.02% incl. tax	Unit "RC 2": Max. 0.02% incl. tax
3	Turnover fees Management company: 100%	Charged on each transaction		N/A		
4	Performance fees	Not poorto	Units IC, ID, ES, RC, RC2 and S:			

Exceptional costs relating to the recovery of debts on behalf of the fund or to proceedings to enforce a right may be added to the recurring costs billed to the fund listed above.

## Method used to calculate the performance fee:

(1) The performance fee is calculated using the indexed method.

The performance supplement to which the 40% tax rate applies represents the difference between:

- the net asset value of the fund, net of fixed management fees, before taking the performance fee provision into account, and
- the value of a benchmark asset which has performed in line with the performance indicator over the calculation period and which has experienced the same fluctuations due to subscriptions/redemptions as the Fund.

<sup>&</sup>lt;sup>2</sup> The net asset value is established on D-1 and is not definitively acquired until the centralisation of fund inflows is fully completed. The net asset value of the fund on which subscription and redemption orders are executed may be recalculated between the time orders are placed and the time they are executed, to take account of any interim exceptional market events.

<sup>\*</sup> The actual operating expenses and fees for other services may exceed the permissible maximum rate, in which case the management company will pay the excess. The management company may also have to make a provision for the maximum permissible fee if the actual "operating expenses and fees for other services" are lower than this fee.

(2) With effect from the fund's financial year beginning on 18/02/2022, any underperformance of the fund in relation to the indicator within the limit of the last five years is offset before outperformance fees become payable. To this end, an extendible observation period of 1 to 5 rolling financial years is set up, with the calculation reset to zero each time a deduction is made from the outperformance fee.

The table below sets out these principles on the basis of example performance assumptions over a 19-year period:

	Net performance	Underperformance to be offset the following year	Payment of the outperformance fee
YEAR 1	5%	0%	YES
YEAR 2	0%	0%	NO
YEAR 3	-5%	-5%	NO
YEAR 4	3%	-2%	NO
YEAR 5	2%	0%	NO
YEAR 6	5%	0%	YES
YEAR 7	5%	0%	YES
YEAR 8	-10%	-10%	NO
YEAR 9	2%	-8%	NO
YEAR 10	2%	-6%	NO
YEAR 11	2%	-4%	NO
YEAR 12	0%	0%*	NO
YEAR 13	2%	0%	YES
YEAR 14	-6%	-6%	NO
YEAR 15	2%	-4%	NO
YEAR 16	2%	-2%	NO
YEAR 17	-4%	-6%	NO
YEAR 18	0%	-4%**	NO
YEAR 19	5%	0%	YES

Net outperformance/underperformance is defined here as the fund's performance above/below the benchmark.

## Notes on the example:

- \*The underperformance of year 12 to be carried forward to the following year (YEAR 13) is 0% (and not -4%) because the residual underperformance of year 8 which has not yet been compensated (-4%) is no longer relevant as the five-year period has elapsed (the underperformance of year 8 is only compensated for up to year 12).
- \*\*The underperformance of year 18 to be carried forward to the following year (YEAR 19) is -4% (and not -6%) because the residual underperformance of year 14 which has not yet been compensated (-2%) is no longer relevant as the five-year period has elapsed (the underperformance of year 14 is only compensated for up to year 18).
- (3) Each time a net asset value is calculated:
- In the event of outperformance in relation to the outperformance trigger threshold, a provision is set aside.
- In the event of underperformance in relation to the outperformance trigger threshold, a provision reversal is recorded up to the available provisions.
  - (4) In the event of outperformance, the fee is payable annually on the last net asset value of the financial year.

It is capped at the difference between the maximum fixed management fee set out in the prospectus and the fixed fee actually applied. The aggregate of the actual fixed management fees and the performance fee is capped daily at the maximum rate of fixed management fees as set out in the prospectus.

## Temporary purchases and sales of securities:

The fund is entitled to all income from the use of efficient portfolio management techniques, net of direct and indirect operating costs.

# Selection of intermediaries:

Intermediaries are selected and evaluated using procedures that are monitored.

All new business relations are reviewed and approved by an ad hoc committee before being approved by senior management. Intermediaries are evaluated at least once a year. This evaluation is based on various criteria and most notably on the quality of order execution (e.g. execution price, execution speed and the quality of transaction settlement) and the effectiveness of research services (e.g. financial, technical and economic analyses and the pertinence of recommendations).

# **III – OBTAINING MORE INFORMATION**

All information concerning the fund may be obtained from the asset management company.

The "voting policy" document and the report on the conditions under which voting rights are exercised are available at www.creditmutuel-am.eu and will also be sent to any unit-holder who requests them from the management company at the following address:

- Management company:

CREDIT MUTUEL ASSET MANAGEMENT Service Marketing et Communication 4 rue Gaillon – 75002 PARIS.

In some cases, information on events that may affect the fund will be provided by Euroclear France and/or via various media in compliance with the applicable regulations and marketing policy.

Procedures for managing conflicts of interest have been put in place to prevent and manage them in the exclusive interest of unitholders.

#### **▶** ESG criteria

Information on environmental, social and governance (ESG) investment criteria is available at www.creditmutuel-am.eu and in the annual report.

#### **IV - INVESTMENT RULES**

Pursuant to the provisions of the French monetary and financial code, the rules that govern the composition of the fund's assets and its risk diversification must be observed at all times. If these limits are exceeded independently of the Management Company or following the exercise of a subscription right, the Management Company's priority will be to rectify the situation as quickly as possible, taking into account the interests of the fund's unitholders.

#### **V – OVERALL RISK EXPOSURE**

The overall risk exposure to derivatives contracts is determined using the commitment approach.

#### VI - ASSET VALUATION AND ACCOUNTING RULES

## **RECOGNITION OF INCOME**

The fund recognises income on a cash basis.

# **RECOGNITION OF SECURITIES TRANSACTIONS:**

The recognition of the portfolio security transactions does not include trading expenses.

### **VALUATION METHODS**

The following rules apply to all valuations of assets:

#### Listed equities and equivalent securities (both French and foreign):

These securities are valued at their market price.

The price used for valuation depends on where the security is listed:

European exchanges: Daily opening price.

European exchanges:

Australian exchanges:

North-American exchanges:

South-American exchanges:

The most recent daily price.

Previous day's closing price

Previous day's closing price

If no quote for a given security can be obtained the previous day's closing price will be used.

# Bonds, EMTNs and equivalent debt securities (both French and foreign):

These securities are valued at their market price:

The price used for valuation depends on where the security is listed:

European exchanges: Daily opening price.

European exchanges:

Australian exchanges:

North-American exchanges:

South-American exchanges:

The most recent daily price.

The most recent daily price.

Previous day's closing price

Previous day's closing price

If no quote for a given security can be obtained the previous day's closing price will be used.

If the fund manager feels that the price quoted is not realistic, a price that more closely reflects actual market conditions will be estimated. Depending on the sources available, various methods may be used to estimate this price, such as:

- the application of an internal valuation model
- a price from a price contributor
- an average price from two or more contributors

- a price calculated using an actuarial method, from a credit or other spread and a yield curve,
- etc.

Share or units of UCITS, AIF and other funds in the portfolio: These securities are valued on the basis of the fund's most recent net asset value.

Securitisation funds: Securitisation funds listed on a European market are valued at their daily closing price.

#### Temporary acquisitions of securities:

Reverse repurchase agreements: Valued at the contractual value. The term will not exceed three months.

Option repurchase agreements: Securities thus acquired are valued at the contractual value, since it is sufficiently certain that the

seller will buy the securities back.

Securities borrowing:

The borrowed securities and the corresponding debt are valued at the market price of the

securities.

#### Temporary disposals of securities:

Repurchase agreements: Securities delivered under repurchase agreements are valued at market price, debts representing

securities delivered under repurchase agreements are maintained at the value set out in the

contract.

Securities lending: Securities that are lent are valued at their market price. These securities are recovered by the

fund when the lending agreement expires.

## **Unlisted securities:**

Unlisted securities are valued on the basis of net assets, cash flows and prices paid during recent significant transactions.

#### Negotiable debt securities:

NDSs (negotiable debt securities) acquired with a residual life are valued at their market value.

Applicable market values:

## **BTF/BTAN**

The yield to maturity at the daily rate published by the Banque de France.

# Other NDSs:

Other negotiable debt securities that are regularly quoted will be valued at yield to maturity or at the daily market price. Securities for which prices are not regularly or realistically quoted will be valued using an actuarial model that uses the yield to return method at a reference yield curve rate adjusted by a representative margin (to account for the issuer's intrinsic credit quality).

# **Futures contracts**

The market prices used to value futures contracts must correspond to the prices of the underlying securities.

These prices depend on where the contracts are traded.

Futures listed on European exchanges are valued using:

- opening market price of the day or previous day's clearing price

Futures contracts listed on North American exchanges are valued at

- the daily closing price or previous day's clearing price.

## **Options**

The market prices used for options observe the same rule as those used to value futures contracts and their underlying securities: Options listed on European exchanges are valued using:

- opening market price of the day or previous day's clearing price

Options listed on North-American exchanges are valued using:

- the daily closing price or previous day's clearing price.

#### Swaps:

Swaps are marked to market.

Index swaps are valued at the price given by the counterparty, and the management company independently monitors this valuation. When the quality and maturity of the securities swapped can be clearly determined, an overall assessment of these two factors is made.

## Forward exchange contracts

These contracts are used to hedge the currency risk of portfolio securities that are denominated in a currency other than the fund's currency, by borrowing an equivalent amount of the other currency. Forward currency transactions are valued at the interest rate of the foreign currency.

# **VALUATION OF OFF-BALANCE SHEET COMMITMENTS**

Futures and forward contract commitments are valued at their market value. The market value is the valuation price multiplied by the number of contracts and their nominal value. Forward contract commitments are valued at their nominal value, or lacking this at an equivalent amount.

Option commitments are valued on the basis of the option's underlying equivalent. This translation involves multiplying the number of options by a delta. The delta value is determined using a Black-Scholes type mathematical model with the following parameters: the underlying price, the time until expiration, the short-term interest rate, the option's exercise price and the underlying's volatility. The presentation of the off-balance sheet commitment reflects the economic nature of the transaction and not the position in the option transaction.

Dividend swaps are recognised at their nominal value off the balance sheet.

All swaps are recorded off the balance sheet at their nominal value.

# VII - Remuneration

Detailed information on our remuneration policy is available at <a href="https://www.creditmutuel-am.eu">www.creditmutuel-am.eu</a>. A paper copy is available free of charge on request from CREDIT MUTUEL AM - Service Marketing et Communication- 4, rue Gaillon- 75002 PARIS.