

Officium Asset Management

Voting Policy

In conformity with paragraphs 314-100 to 314-104 of the general regulations of the AMF (the financial markets authority), the asset management company has drawn up a document entitled 'Voting Policy', updated where necessary, which presents the conditions under which it intends to exercise voting rights concerning the securities held under the mandates it manages.

This document deals in particular with the following:

1. The organization of the asset management company enabling it to exercise these voting rights. It specifies the company organs charged with drawing up and analysing resolutions submitted and the organs charged with deciding on the votes to be made;
2. The principles to which the asset management company intends to refer in order to determine the cases in which it will exercise these voting rights. These principles may concern, in particular, the thresholds of securities held which the asset management company has set for participating in votes on resolutions submitted to the general assemblies. In this case, the company will state its reasons for choosing this threshold. These principles may also concern the nationality of the issuing companies in which the mandates managed by the asset management company hold securities, the nature of the securities management and the recourse to the temporary sale of securities by the asset management company;
3. The principles to which the asset management company intends to refer on the occasion of its exercising its voting rights;
4. The description of procedures destined to detect, prevent and manage situations of conflict of interests liable to affect the free exercise of voting rights by the asset management company;
5. The indication of the current mode of exercising voting rights such as effective participation in assemblies, the use of proxies without indicating the agent, or the use of voting by correspondence.

This document has been made available to the AMF. It may be consulted on the website of the asset management company or at its head office according to the terms indicated in the simplified prospectus.

Officium Asset Management has been authorized under directive number 2004/39/CD (Directive MIF). The management mandates do not envisage the transfer of the voting rights of principals to the asset management company. Thus the asset management company does not exercise voting rights attached to the securities held by the mandates which it manages.

Consequently, Officium Asset Management is not required to establish a voting policy.