

AMUNDI CANADA INC.

PROTECTION OF PERSONAL INFORMATION POLICY

August 31, 2023

INTRODUCTION

Amundi Canada Inc. ("Amundi Canada" or "we") is incorporated under the *Canada Business Corporations Act* and its registered office is located in the Province of Québec. It acts, exclusively with respect to Canadian institutional clients, as a portfolio manager, investment fund manager and exempt market dealer in several Canadian provinces.

As an entity registered with securities regulators, Amundi Canada collects, uses, discloses and retains a significant amount of information in the course of its business. This information includes personal information. For Amundi Canada, the protection of privacy and the confidentiality of the information transmitted and collected are paramount. As such, we are committed to the security of information, to using it for the benefit of our clients, acting ethically and responsibly, and taking a transparent approach to our clients so that they can control their information and how it is used.

Amundi Canada's Protection of personal information policy (the "Policy") applies to our business and the products and services we offer in Canada. For example, it applies to a client who invests through our products and services or if you visit our website.

A member of the Crédit Agricole Group and the Amundi Group, Amundi Canada is a 100%-owned subsidiary of Amundi Asset Management ("Amundi"), a company incorporated under French law. As a European entity, Amundi must comply with the requirements of the General Data Protection Regulation (the "GDPR"). This regulation is based on the principle of responsibility, according to which data protection must be taken into account by design (of a service or product) or by default, and by the establishment of an internal structure, measures and tools that can guarantee optimal protection of the persons whose personal information is processed. Amundi Canada is also subject to the policies and procedures that flow from the requirements of the GDPR, the principles of which are in line with the obligations that flow from the legislation applicable in Québec.

The Policy complements those of the Crédit Agricole Group and the Amundi Group that are applicable to Amundi Canada.

We developed the Policy in accordance with applicable Québec and Canadian legislation (the "Legislation").

The Policy explains, with respect to personal information:

- what we collect
- how we use it
- the parties to whom we disclose it
- its transfer outside Québec
- its preservation
- how we keep it safe
- access and correction rights
- requests, complaints and communication

The Policy also aims to inform our clients so that they can notify individuals affected by the Policy and obtain their consent to the collection, use and disclosure of their personal information. The individuals involved include, but are not limited to, the beneficial owners of the client, their associates, committee members, representatives, employees, directors, officers, agents and other persons related to the client.

Table of Contents

WHAT IS “PERSONAL INFORMATION”?	3
WHAT PERSONAL INFORMATION DO WE COLLECT AND HOW?	3
FOR WHAT PURPOSES DO WE USE PERSONAL INFORMATION?	3
WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?.....	4
TRANSFER OF PERSONAL INFORMATION OUTSIDE QUÉBEC.....	5
HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?	5
PERSONAL INFORMATION SECURITY	6
YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION	6
EUROPEAN UNION NOTICE	7
REQUESTS, COMPLAINTS AND COMMUNICATION	7
MODIFICATION OF THE POLICY.....	7
CONTACT US.....	7

WHAT IS “PERSONAL INFORMATION”?

Personal information is information that relates to a natural person and allows that person to be identified, directly or indirectly (for example, by name, address, email address, etc.). The Legislation applies regardless of the nature of the medium and the form in which this information is accessible, whether written, graphic, audio, visual, computerized or otherwise. However, aggregated or anonymized information that cannot be associated with an identifiable individual is not considered personal information. Information concerning a natural person shall be anonymized when it no longer irreversibly identifies that person directly or indirectly.

WHAT PERSONAL INFORMATION DO WE COLLECT AND HOW?

In order to provide our services, respond to requests and meet our regulatory obligations such as know your client determination (“KYC”), we collect personal information. We limit our collection to personal information that is reasonably necessary to achieve the purposes for which it was collected. In particular, we collect:

- personal identifiers such as name, mailing and email addresses, telephone number, passport number and signature specimens;
- information necessary for money laundering, sanctions, financial crimes and fraud prevention verification;
- information about Internet or other electronic network activities, such as browser type, Internet service provider, referring/exit pages and pages viewed on our website.

We obtain personal information through lawful and legitimate means in a variety of ways and from different sources, including:

- directly from you as part of our relationship: when you provide identification documents under agreements, information gathering in relation to our KYC obligations;
- by verbal or written communications from you;
- from third parties who have a connection with you, such as advisors who represent you;
- through our website, using technologies such as cookies and tags.

FOR WHAT PURPOSES DO WE USE PERSONAL INFORMATION?

We limit the purposes for which personal information is used to those that are necessary to achieve the purposes for which it was collected with your prior consent, or as permitted or required by law. The main legal grounds for our use of your personal data are:

- **Execution of a contract:** where your information is necessary to enter into or execute a contract with you;
- **Legal obligation:** when we need your information to fulfill our legal obligations;
- **Legitimate interests:** when we use your information in response to a legitimate interest and our reasons for using it outweigh any harm to your data protection rights;
- **Legal action:** where your information is necessary for us to defend ourselves in an action against us or to bring an action or claim against you or a third party, as the case may be;
- **Consent:** where you have consented to the use of your personal information.

We may use your personal information in the following ways:

- offer our products and services:
 - establish and maintain our discretionary portfolio management mandates;

- manage aspects of the products and services we offer;
- provide you with information about our products and services;
- update your personal information and records;
- ensure that the information in your records is accurate and, if necessary, verify the information provided.
- manage our business activities:
 - perform due diligence to prevent or reduce our commercial risks, such as administering our good governance requirements and those of other members of the Amundi Group or managing and having our commercial activities audited;
 - ensure the security of our information, systems or networks;
 - comply with legal and regulatory obligations, requirements and guidelines (such as securities legislation applicable to opening an account and applicable money laundering legislation);
 - facilitate the sale of one or more parts of our business, restructure our business and obtain and submit claims;
 - respond to audits, evaluations and similar requests.
- fulfill our legal, regulatory or risk management obligations by:
 - perform customer due diligence/KYC;
 - combat money laundering and corruption;
 - verify sanctions or reputational risks;
 - identify conflicts of interest;
 - take and enforce security measures, where appropriate;
 - comply with the obligations of foreign laws, where applicable: and
 - detect and prevent fraud.
- manage our website:
 - when you visit our website, we may use your personal information to manage and facilitate the use of our website, which may include cookies and other similar technologies (as detailed in our Cookie Policy).

WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

We may disclose your personal information to entities of the Crédit Agricole and Amundi groups, to our service providers (companies that carry on business on our behalf) and in connection with the sale or transfer of our business or other transactions. We may also share your personal information with your consent or in accordance with applicable law.

- Crédit Agricole Group and Amundi Group entities

Amundi Group entities may share personal information with each other and use it for the purposes described in the Policy. This allows them to comply with applicable laws, regulations and requirements and to ensure that your information is consistent, accurate, and up to date.

- Other financial institutions and similar organizations

We may disclose your personal information to custodians or financial institutions when it is necessary to do so to carry out instructions, such as transfers of funds.

- Service providers

We may transfer your personal information to our suppliers or other organizations that provide services to Amundi Canada for the purposes set out in this Policy. Service providers that may receive personal information include account preparation companies, mail and courier companies, document storage companies, backup and server hosting providers, IT software and maintenance providers, portfolio management systems, and market intermediary or archiving services.

When we transfer personal information to our service providers, we contractual ensure that the personal information transferred is used only for the purposes for which the service provider was engaged and that it enjoys the same level of protection as ours. Our service providers can be located anywhere in the world, as described in detail under “Transfers of Personal Information Outside of Québec”.

- Sale or transfer of our business or other transactions

We may decide to sell or transfer some or all of our business to a third party, to merge with another entity, to pledge our assets or to undertake any other financing or other strategic equity transaction (including insolvency or bankruptcy proceedings), to carry out a restructuring, to sell shares or to effect any other change of control. We may disclose your personal information when required to do so.

- Other permitted reasons:

We may disclose your personal information where permitted or required by applicable law, for example:

- With domestic and international governments, government agencies, law enforcement and regulatory agencies where required by law, such as in the case of disclosure for tax purposes to the Canada Revenue Agency or securities regulators in accordance with securities legislation.
- With individuals or organizations, fraud prevention agencies, regulatory or government agencies, database or registry operators used to verify information provided in relation to existing information, or other insurance companies, financial or lending institutions to identify or eliminate financial abuse, fraud and criminal activity, protect our assets and interests, assist us in our internal and external investigations of potentially illegal or suspicious activities or manage, defend or settle actual or potential losses related to the foregoing. For these purposes, personal information may be aggregated with data belonging to other individuals and may be subject to data analysis.

TRANSFER OF PERSONAL INFORMATION OUTSIDE QUÉBEC

We may disclose personal information to entities of the Amundi Group and Crédit Agricole Group, including in Canada, the United States, the United Kingdom and the European Union. Some of our service providers may also access, process or store your personal information outside of the country where we are located and where you live. Therefore, when your personal information is used or stored in a jurisdiction other than the one in which you reside, it may be subject to the laws of that foreign jurisdiction, including any law that permits or requires the disclosure of the information to the government, government agencies, courts and law enforcement agencies of that jurisdiction.

When we transfer your personal information outside your country of residence, we enter into contractual agreements between the entities of the Amundi Group and the Crédit Agricole Group and with our service providers in order to ensure adequate protection of your personal information.

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

We store your personal information for the time necessary to provide you with services, manage our business activities and comply with our legal and regulatory obligations. When it is no longer needed, your personal information is securely destroyed or anonymized (so that it can no longer identify you).

PERSONAL INFORMATION SECURITY

We recognize that information security is an integral part of data privacy.

We take appropriate measures and controls to protect your personal information. Examples of these measures include restricting physical access to our offices and records, restricting access to your personal information to only those employees or representatives who need it to fulfill their responsibilities, restricting unauthorized access, disclosure and use of your personal information in our custody or control, storing archives with third parties located outside our offices in secure locations, using firewalls, passwords and file encryption for our online activities.

Our purpose is to prevent unauthorized access, loss, abuse, disclosure or alteration of personal information in our possession. We also use these security measures when we dispose of or destroy your personal information.

YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

You can choose how we treat your personal information.

- Change your browsing settings on your device

We use technology to improve your customer experience. Through technologies such as cookies, our website recognizes you when you use or return to it. You can remove or disable some of these technologies at any time using your browser.

Please refer to your browser instructions or help screen for information on how to block, delete and manage cookies on your computer or mobile device.

Please refer to our Cookie Policy for more information.

- Restrict the collection, use and disclosure of your personal information

You may withdraw your consent to the collection, use and disclosure of personal information in accordance with this Policy at any time upon giving Amundi Canada reasonable written notice, subject to legal or contractual restrictions.

You may have access to your personal information and request corrections to inaccurate information, subject to certain exceptions in applicable laws. Please contact us in writing using the contact details in the "Contact Us" section below.

- Correct your personal information

To access and correct your personal information, please contact us in writing using the contact information under the "Contact Us" section below.

In certain circumstances and in accordance with applicable data protection laws, you may have the right to ask us to:

- provide you with additional details about how we use your information;
- provide you with a copy of the information we hold about you;
- correct inaccuracies in the personal data we hold;
- delete personal data because there is no longer a legal basis for their use;
- where processing is based on consent, to withdraw your consent to collection;
- contest any processing based on legitimate interests unless our reasons for doing so outweigh any prejudice to your data protection rights; and
- restrict how we use your information while a complaint is under investigation.

EUROPEAN UNION NOTICE

For the processing of personal information by an entity of the Crédit Agricole Group or the Amundi Group located in the United Kingdom or in the European Union, please refer to the policies on the website www.amundi.com.

REQUESTS, COMPLAINTS AND COMMUNICATION

We are required to take reasonable steps to ensure that your personal information remains accurate. To assist us in this regard, please let us know of any changes to the personal information you have provided by contacting us at dpocanada@amundi.com.

While it is our policy to respect the rights of individuals, please be aware that your exercise of these rights may be subject to certain exceptions to protect the public interest such as preventing or detecting a crime, or our interests, and that some of these rights may be limited (e.g., the right to withdraw consent) when we are required or permitted by law to continue to process your personal information in order to defend our legal rights or fulfill our legal and regulatory obligations.

If you contact us to exercise any of these rights, we will verify whether you are entitled to do so and respond in most cases within one month.

If you are not satisfied with the use we make of your personal data or by our response to the exercise of these rights, you have the right to complain to the competent supervisory authority for Québec, namely the *Commission d'accès à l'information du Québec*: www.cai.gouv.qc.ca.

MODIFICATION OF THE POLICY

We can make changes to the Policy. Any changes take effect when we post the revised Policy on our website. If we make any material changes, we will contact you to inform you when required by law. By continuing to deal with us after the new version of the Policy has been posted, you agree to the changes to the Policy, subject to any other requirements that may apply. It is your responsibility to ensure you have read, understood and accepted the latest version of the Policy. The effective date at the top of the Policy indicates its latest update.

CONTACT US

If you have any questions or complaints about how we handle your personal information, please contact us by email at dpocanada@amundi.com.