

INTEGRITY OF MARKETS

CACEIS is a member of the Crédit Agricole Group and applies the same body of regulations. In accordance with Article 16 of Regulation (EU) 596/2014, CACEIS has and maintains effective measures, systems and procedures to prevent, detect and report suspicious orders and transactions.

When CACEIS has reasonable grounds to suspect that an order or transaction relating to any financial instrument, whether such order has been placed or such transaction executed on or outside a trading venue, could constitute insider dealing, market manipulation or attempted insider dealing or market manipulation; This shall be notified to the competent authority.

This system extends to CACEIS branches.

CACEIS has an automated system for detecting insider dealing, market manipulation or attempted insider dealing or market manipulation. The scenarios deployed and variables used are subject to a periodic review.

CACEIS applies Delegated Regulation (EU) 2016/957 and in particular Article 4 thereof on training:

• CACEIS staff receives regular training on the prevention of insider dealing, market manipulation or

- attempted insider dealing or market manipulation.
- The staff in charge of supervision within CACEIS' Compliance Department undergo comprehensive and effective training on the monitoring, detection and identification of orders and transactions that could constitute insider dealing, market manipulation or attempted insider dealing or market manipulation. Such training takes place regularly and is appropriate and proportionate to the scale, volume and nature of the activities carried out.