

## Prospectus

The shares or units of the UCITS mentioned herein (“the UCITS”) have not been registered under the US Securities Act of 1933 and may not be offered or sold directly or indirectly in the United States of America (including its territories and possessions), to US persons, as defined in Regulation S (“US persons”).

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## 1. General characteristics

**Name:**

**GROUPAMA AVENIR EURO**

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

French mutual fund (Fonds Commun de Placement – FCP).

**Inception date and expected term:**

11 May 1994

This UCITS was initially formed for a 99-year term.

**Summary of the management offer:**

Units	ISIN code	Eligible subscribers	Allocation of distributable income	Base currency	Minimum initial subscription amount	Initial net asset value
GA unit(3)	FR0010891606	Reserved for companies, subsidiaries and regional mutuals of Groupama Assurances Mutuelles	Accumulation and/or distribution and/or carried forward	Euro	€300,000	€10,000
I2C unit	FR001400MYB2	Reserved for institutional investors	Accumulation	Euro	One thousandth of a unit	€1,000
IC unit(3)(4)	FR0010589325	Reserved for institutional investors	Accumulation	Euro	One thousandth of a unit	€10,000
IC CHFH unit(2)(4)	FR0013122249	Reserved for institutional investors	Accumulation	CHF (covered)	One thousandth of a unit	CHF 10,000
IC USD unit(3)(4)	FR0012270247	Reserved for institutional investors	Accumulation	USD dollar	One thousandth of a unit	\$10,000
IC USDH unit(2)(4)	FR0013122231	Reserved for institutional investors	Accumulation	US dollars (hedged)	One thousandth of a unit	\$10,000
NC unit	FR0010288308	All subscribers	Accumulation	Euro	€500	€500
OAC unit	FR001400N3C8	Reserved for UCIs and mandates managed by Groupama Asset Management or its subsidiaries that are part of the Oxygène range.	Accumulation	Euro	One thousandth of a unit	€10,000
OSC unit(3)(4)	FR0010891663	Reserved for UCIs and mandates managed by Groupama Asset Management or its subsidiaries that are part of the Opale range.	Accumulation	Euro	One thousandth of a unit	€10,000
RC unit(5)	FR0013297942	Reserved for investors subscribing via distributors or intermediaries that provide advisory services (within the meaning of the MiFID II European regulation) or individual portfolio management services under mandate, and that are exclusively remunerated by their clients	Accumulation	Euro	One thousandth of a unit	€500
VA unit(3)	FR0010766733	Reserved for institutional investors	Accumulation and/or distribution	Euro	€1,000,000	€10,000
ZC unit(1)(3)(4)	FR0000990038	Reserved for institutional investors, particularly insurance companies marketing life insurance contracts	Accumulation	Euro	€150,000	€1,524.49

(1) Including all units subscribed in the UCITS before unit classes were created.

(2) These units are systematically hedged against exchange rate risk in relation to the UCITS' reference currency.

(3) Comprising all unitholders who subscribed to the UCITS before 24/10/2016

(4) Including all subscriptions processed before 03/07/2017

(5) Including all subscriptions processed before 15/02/2018

As of 24/06/2024, the names of the units have changed:

- unit G has become GA
- unit M2 has become I2C
- unit MC has become IC
- unit MSH has become IC CHFH
- unit MU has become IC USD
- unit MUH has become IC USDH
- unit N has become NC
- unit OA has become OAC
- unit OS has become OSC
- unit R has become RC
- unit V has become VA
- unit I has become ZC

**Address from which the Fund's regulations (if not attached) and the latest annual report and latest financial statement may be obtained:**

Unitholders will be sent the latest annual documents and the breakdown of the assets within eight business days of sending a written request to:

Groupama Asset Management, 25 rue de la Ville-l'Évêque, 75008 Paris, France.

The documents are also available on the company's website at [www.groupama-am.com](http://www.groupama-am.com).

Contact details:

For corporate and institutional investors: Groupama Asset Management's Business Development Department (Sales office: +33 (0)1 44 56 76 76).

For individual investors: your distributor (Groupama Assurances Mutuelles' distribution networks; external distributors approved by Groupama Asset Management).

Additional information, if required, may be obtained from Groupama Asset Management's Business Development Department (Sales office: +33 (0)1 44 56 76 76).

## 2. Parties concerned

### Management Company

Groupama Asset Management (*Société Anonyme* – public limited company), 25 rue de la Ville-l'Évêque, 75008 Paris, France, a Portfolio Management Company authorised by the *Commission des opérations de bourse*, now the *Autorité des marchés financiers* (French financial markets authority – AMF), under number GP 93-02 on 5 January 1993.

### Conflict of interest management policy:

In order to identify, prevent, manage and monitor conflicts of interest that result from delegations, the Management Company has implemented a conflict of interest management policy available on request from your usual advisor or on the Management Company's website [www.groupama-am.com](http://www.groupama-am.com)

### Custodian – Transfer agent

**CACEIS BANK**, a *société anonyme* (public limited company) and credit institution authorised by the CECEI (now the ACPR (Autorité de Contrôle Prudentiel et de Résolution – French Prudential Supervisory and Resolution Authority)) on 1 April 2005, whose registered office is at 89–91 rue Gabriel Péri, 92120 Montrouge, France.

The custodian's duties, as defined by the applicable regulations, include keeping custody of the assets, checking that the management company's decisions are lawful and monitoring the UCI's cash flows.

The custodian is independent of the management company.

The description of the delegated custodial duties, the list of representatives and sub-representatives of CACEIS Bank and information relating to conflicts of interest that may result from these delegations are available on the CACEIS website: [www.caceis.com](http://www.caceis.com).

Updated information is made available to investors.

### Clearing house for subscriptions/redemptions:

- **Groupama Asset Management**, for pure registered units.

Following collection of these orders, Groupama Asset Management will forward them to CACEIS Bank in its capacity as an affiliate of Euroclear France.

- **CACEIS Bank**, by delegation of the management company, for bearer or administered registered units.

**Institution appointed to receive subscriptions and redemptions, and responsible for compliance with the clearing deadlines indicated in the prospectus,** by delegation of the management company

CACEIS BANK

### Fund accounting:

**CACEIS Bank** is responsible for the UCI's fund accounting, which includes the clearance of subscription and redemption orders for units of the UCI. It will process these orders in partnership with Euroclear France, with which the UCI is listed, and manage the UCI's unit issuance account for bearer or administered registered units.

**Statutory auditor**

**Deloitte & Associés** – 6 Place de la Pyramide, 92909 Paris-La-Défense, France.

**Accounting manager:**

CACEIS FUND ADMINISTRATION, 89–91 rue Gabriel Péri, 92120 Montrouge, France, a credit institution authorised by the CECEI (now the ACPR) on 1 April 2005.

### 3. Operating and management principles

#### 3.1 General characteristics

**Characteristics of units:**

- Type of right attached to the unit class:  
Each unitholder has a shared ownership right in the UCITS assets in proportion to the number of units held.
- Shareholder register and fund accounting:  
Fund accounting for liabilities is provided by the custodian.  
Unit administration is performed by Euroclear France.
- Voting rights:  
No voting rights are attached to the units, as decisions are made by the management company.
  
- Types of units:  
Units are registered and/or bearer units.
- Fractioning:  
Units may be subscribed in exact amounts or in ten-thousandths of a unit for ZC, NC and RC classes.  
Units may be subscribed in exact amounts or in thousandths of a unit for IC, IC USD, IC USDH, IC CHFH, I2C, VA, GA, OAC and OSC units.  
Units may be redeemed in exact amounts or in ten-thousandths of a unit for ZC, NC and RC classes.  
Units may be redeemed in exact amounts or in thousandths of a unit for IC, IC USD, IC USDH, IC CHFH, I2C, VA, GA, OAC and OSC units.  
The total redemption of units will only be possible as a quantity and not as an amount

**Financial year-end:**

- Last Paris Stock Exchange trading day in February.
- The first financial year ended on the last Paris Stock Exchange trading day in September 1995.

**Tax system:**

- The Fund is eligible for PEA (personal equity savings plans) for individual investors.
  - o The UCITS is not subject to corporation tax. In accordance with the principle of transparency, the tax authorities consider the unitholder to be the direct owner of a share of the financial instruments and cash held in the UCITS.
  - o The tax treatment of any capital gains or income from holding UCITS units depends on tax provisions specific to the investor's own particular circumstances and/or on the tax provisions in the country where the unitholder resides. We recommend that you seek advice on this matter from your financial advisor.
  - o The French tax system considers a switch from one unit class to another unit class to be a sale subject to capital gains tax.

#### 3.2 Special provisions

**ISIN codes:**

GA unit:	FR0010891606
I2C unit:	FR001400MYB2
IC unit:	FR0010589325
IC CHFH unit:	FR0013122249
IC USD unit:	FR0012270247
IC USDH unit:	FR0013122231
NC unit:	FR0010288308
OAC unit:	FR001400N3C8
OSC unit:	FR0010891663
RC unit:	FR0013297942

VA unit: FR0010766733

ZC unit: FR0000990038

**AMF classification:** Eurozone equities

**SFDR classification:**

This Fund is a financial product that promotes environmental or social characteristics, or a combination of these characteristics, in accordance with Article 8 of the SFDR (Sustainable Finance Disclosures Regulation).

**Investment in UCIs:** up to 10% of net assets.

**Management objective:**

The fund's management objective is to outperform its benchmark, the MSCI EMU Small Cap Index (closing price, net dividends reinvested), over the recommended investment period of more than five years. To do this, the fund manager may use active management to trade mainly in Eurozone small- and mid-cap equities selected in a fundamental, discretionary manner and fulfilling environmental, social and governance (ESG) criteria.

**Benchmark index:**

The benchmark is the MSCI EMU Small Cap (closing) index, net dividends reinvested.

The MSCI EMU Small Cap Index, with net dividends reinvested, is published by Morgan Stanley Capital International and represents small and medium-capitalisation listed companies in the eurozone that meet appropriate liquidity criteria. It is a sub-index of the MSCI EMU. The index is calculated by weighting each security (approximately 250) by its market capitalisation (public float only). It is expressed in euros with dividends reinvested.

This index is only a reference. No mechanism to maintain any level of correlation with it is in place as part of the managerial approach implemented. Nevertheless, the behavioural profile of the portfolio and the index may be comparable in certain market configurations.

MSCI DEUTSCHLAND GmbH, the administrator (the "Administrator") of the MSCI EMU Small Cap (closing) Benchmark Index, with net dividends reinvested, has obtained authorisation and is therefore included in the register of administrators and benchmark indices held by ESMA.

The Administrator will make information on its indices available to the public on its website at <https://www.msci.com/indexes>.

Groupama Asset Management has an internal action plan which will be implemented in the event of substantial modification or termination of the Index.

**Investment strategy:**

- Portfolio composition strategy:

The investment strategy implemented is based on the fund manager's financial and extra-financial convictions regarding a portfolio made up of companies selected in a fundamental, discretionary manner

To achieve its management objective, management of the Fund is based on a process made up of four major phases:

Generation of investment ideas;  
Analysis of securities;  
Valuation of securities;  
Investment decision.

The investment process is based on a pure stock-picking approach only, i.e. the identification, analysis and selection of companies deemed capable of creating medium/long-term value thanks to their positioning in growth markets. No consideration is given to the macroeconomic context, or the beta, and there is no predefined allocation strategy; this selection is based only on companies' ability to create medium/long-term value for their shareholders.

It focuses on an in-depth financial analysis of companies: validation of the industrial model with management, modelling and medium-term valuation of the value-creation potential. Once the securities have been selected and incorporated into the portfolio, the process focuses on monitoring the companies' proper execution of their industrial strategies and their value creation, with a view to long-term success.

The management approach aims to implement:

- o An investment process that prioritises stock-picking and is based on:  
The weight given to company visits and analysis within the process  
The use of an internal valuation model

- o A conviction-based management approach, resulting in:  
A high-conviction portfolio  
Selected economic models deemed to have potential  
Consistency in the choice of securities

Integration of ESG criteria:

The extra-financial analysis applied to the UCITS takes into account criteria relating to each of the environmental, social and governance factors. The UCITS seeks to select the highest-rated issuers within the investment universe, based on extra-financial criteria (best-in-universe approach). The best-in-universe ESG approach implemented in the management process is presented in more detail in the ESG annex of the prospectus.

Various indicators are used to analyse ESG criteria, including:

- o Environment: biodiversity, waste management etc.;
- o Social: employee training, supplier relations etc.;
- o Governance: board independence, executive compensation policy etc.

ESG criteria are taken into account in the portfolio management process in accordance with the following requirements:

**Exclusions at management company level:**

- o Exclusion of securities belonging to the “Major ESG Risks” list: Groupama Asset Management tracks a list of securities considered to carry significant ESG risks (the “Major ESG Risks” list). These are companies whose ESG risks could call into question their economic and financial viability or could have a significant impact on the value of the company and thus lead to a substantial loss in the value of their stock or a significant downgrade by the rating agencies;
- o Application of Groupama AM’s sector-specific policies on controversial weapons and fossil fuels. Securities involved with controversial weapons and the coal sector are excluded under the criteria set out in our policy. Securities involved in the production of unconventional fossil fuels cannot be reinvested under the criteria set out in our policy.
- o Application of the normative exclusions regarding tax non-cooperation, corruption and money laundering in accordance with Groupama AM’s AML-CFT policy.

**Specific portfolio constraints:**

- Exclusion of the tobacco sector: Companies with more than 5% of their turnover from the production or distribution of tobacco, or of products containing tobacco, are excluded.
- Exclusion of companies in violation of the UN Global Compact principles.
- The **portfolio’s average score for the indicator (net job creation) must be at least 20% better than its investment universe.**
- The portfolio’s securities selection process should result in a minimum screening rate for the net job creation indicator of 90% of the portfolio, excluding money market UCIs, cash and derivatives.
- A minimum 25% allocation to sustainable investment, in accordance with the definition of sustainable investment indicated above.

**Integration of the EU Taxonomy:**

Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 (the “EU Taxonomy” or the “Taxonomy Regulation”) aims to identify environmentally sustainable economic activities. It identifies these activities based on their contribution to six main environmental objectives:

- climate change mitigation,
- climate change adaptation,
- the sustainable use and protection of water and marine resources,
- the transition to a circular economy (waste, reduction and recycling),
- pollution prevention and mitigation, and
- the protection and restoration of biodiversity and ecosystems.

To be considered as sustainable, an economic activity must demonstrate that it makes a substantial contribution to achieving one of the six objectives, without prejudice to any of the other five (the “Do No Significant Harm” principle, hereinafter the “DNSH” principle). The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. For an activity to be considered aligned with the EU Taxonomy, it must also uphold the human and social rights enshrined in international law.

In its investment decisions, the management team shall endeavour to take into account the European Union’s criteria for economic activities considered to be environmentally sustainable under the Taxonomy Regulation (EU) 2020/852. Based on the issuer data currently available, the minimum proportion of investments aligned with the EU Taxonomy is 0%.

Methodological limitations: the ESG approach developed by Groupama Asset Management is centred around a quantitative and qualitative analysis of the environmental, social and governance practices of the securities in which it invests. The main limitation of this analysis relates to the quality of the available information. Indeed, ESG data is not yet standardised, and our analysis is ultimately based on qualitative and quantitative data provided by the companies themselves, some of which may still be fragmented and heterogeneous. To overcome this limitation, Groupama Asset Management focuses its analysis on the most important aspects of the sectors and companies analysed.

- Management style:

The UCITS adopts an active management style aimed at outperforming its benchmark. Stock-picking involves a high level of volatility in terms of performance due to the specific characteristics of small- and mid-cap stocks (liquidity, for instance).

- Assets, excluding embedded derivatives
  - o Equities markets:  
In the context of portfolio management, eurozone equities represent at least 75% of the Fund's net assets. However, the manager may invest up to 10% of net assets in markets outside the eurozone.

The minimum equity risk exposure is 75% of net assets. The investment universe consists of small-cap and mid-cap equities. The manager reserves the right to invest in large-cap companies. The relative weighting of small- and mid-cap companies versus large-cap companies is not fixed but remains predominant, varying according to market opportunities.

- Bond market:  
The UCITS may only invest in fixed-income products through UCIs, up to a maximum of 10% of the Fund's net assets.
- Holding shares or units of other foreign UCITS, AIFs or investment funds:  
The UCITS may invest up to 10% of the net assets in units or shares of UCIs.  
The UCIs may be those managed directly or indirectly by Groupama Asset Management.

External UCIs will be subjected to a close review of their management procedures, performance, risk and any other qualitative or quantitative criteria that allow the short-, medium- or long-term quality of management to be assessed.

Up to 10% of the net assets may be invested in trackers (i.e. listed index entities).

- Derivative instruments and securities with embedded derivatives  
The use of derivatives and securities with embedded derivatives is authorised subject to a maximum commitment of 20% of the UCITS' net assets and therefore has an impact both on the UCITS' performance and its level of risk. However, they make it possible to create exposure to or hedge against a specific risk, and in that respect they increase the strategy's flexibility. Derivatives are therefore used to maximise performance. The strategy for the use of securities with embedded derivatives is the same as that described for derivative instruments.

The fund manager may trade in the derivatives and securities with embedded derivatives described in the table below:

Risks in which the fund manager intends to trade		Types of markets targeted			Types of trades			
Equity	x	Regulated	Organised	Over the counter	Hedging	Exposure	Arbitrage	Other
Interest rate								
Foreign exchange	x							
Credit								
<b>Derivative instruments used</b>								
<b>Futures</b>								
- Equity		x	x		x	x		
- Interest rate								
- Currency		x	x		x	x		
<b>Options</b>								
- Equity		x	x	x	x	x		
- Interest rate								
- Currency		x	x	x	x	x		
<b>Swaps</b>								
- Equity		x	x	x	x	x		
- Interest rate								
- Inflation								
- Currency		x	x	x	x	x		
- Total return								
<b>Forward currency contracts</b>								
- Forward currency contracts		x	x	x	x	x		
<b>Credit derivatives</b>								
- Single-entity credit default swaps and basket default swap(s)								
- Indices								
- Index options								
- Structuring for basket credit derivatives (CDO tranches, iTraxx tranches, FTD, NTD etc.)								
<b>Other</b>								
- Equity								
<b>Securities with embedded derivatives used</b>								
<b>Warrants</b>								
- Equity								
- Interest rate								
- Currency								
- Credit								
<b>Other</b>								
- EMTN								
- Credit-linked notes (CLN)								
- Convertible bonds								
- Contingent convertible bonds (CoCo bonds)								
- Callable or puttable bonds								
<b>Subscription warrants</b>								
- Equity								
- Interest rate								

- Counterparty selection criteria  
Counterparties on over-the-counter instruments (over-the-counter derivatives and effective portfolio management techniques) are selected through a specific procedure applied within the management company; the main selection criteria relate to their financial solidity, their expertise in the types of transactions envisaged, the general contractual clauses and specific clauses relating to techniques for mitigating counterparty risk.
- Deposits:  
Up to 10% of the Fund's net assets may be in the form of deposits with a credit institution based in a member state of the European Union or the European Economic Area, with a term of less than 12 months, as a store of cash to be used as needed.
- Cash borrowings:  
On an exceptional basis, with the aim of investing in anticipation of a market rise or on a temporary basis as part of managing large redemptions, the fund manager may borrow cash up to the value of 10% of the net assets from the custodian.

- Temporary purchases and sales of securities:  
The UCITS does not anticipate the use of leveraging as a structural approach. Securities lending and borrowing and repurchase agreements are also not envisaged. From time to time, equity exposure may slightly exceed 100% of the net assets and create a negative cash position. This type of unusual situation will be short-lived and direct equity exposure will not exceed 110% of the net assets.

Since the UCITS may make use of derivatives, securities with embedded derivatives and cash loans, the portfolio's total level of exposure will not exceed 130% of the net assets.

Further information is given in the "Charges and fees" section.

**Information relating to the UCITS' collateral:** The GROUPAMA AVENIR EURO UCITS complies with the investment rules for financial collateral that are applicable to UCITS and does not apply specific criteria in addition to these rules.

The Fund may receive securities (such as corporate bonds and/or government bonds) or cash in the context of derivatives transactions traded over the counter. The collateral received and its diversification will comply with the restrictions of the Fund/UCITS.

Only the cash collateral received will be reused, via reinvestment in accordance with the rules applicable to the UCITS. All of these assets received as collateral must be issued by high-quality, liquid, diversified issuers with low volatility that are not an entity of the counterparty or its group.

These assets received as collateral will be retained by the custodian of the UCITS on specific accounts. Management of margin calls will be undertaken on a daily basis.

The discounts applied to collateral received take into account the credit quality, the price volatility of the securities and the result of stress tests carried out in accordance with the regulatory provisions.

The level of collateral and the discount policy are determined in accordance with the regulations in force.

#### Risk profile:

- Capital risk:  
Investors will be exposed to the risk of not recovering the full amount of the capital they invest, since the UCITS does not offer any capital guarantee.
- Equity risk:  
The principal risk to which investors are exposed is equity risk, as at least 75% of the UCITS is invested in equities. The Fund's net asset value is highly likely to experience fluctuations comparable to those seen in its preferred investment universe, that of listed equities from the eurozone. The value of an investment and the income derived from it may go up as well as down, and investors may not recover the capital initially invested in the company. The value of a portfolio may be affected by external factors such as political and economic developments or political changes in certain governments.
- Risk linked to investments in small and mid-cap companies:  
In these markets, the volume of securities listed on a stock exchange is small and movements in the market are therefore more dramatic and occur more quickly than in large-cap markets. Unitholders are reminded that the Fund may be exposed to small and mid-cap equity markets that may, by their nature, be subject to significant movements, both upwards and downwards. As such, the Fund's net asset value could fall.
- Use of financial derivative instruments:  
The use of derivatives may increase or decrease the volatility of the UCITS by respectively increasing or decreasing its exposure. However, this should remain relatively close to its benchmark index, even if it may vary from time to time.
- Liquidity risk:  
Some of the Fund's assets may turn out to be illiquid, potentially causing a long delay between the date that an order is placed and the date of its execution. During this delay, the value of the instruments may fall significantly, which could entail a drop in the value of the Fund.
- Exchange rate risk:  
The exchange rate risk is related to the Fund's exposure, via its investments and by its trades in forward financial instruments, in a currency other than that of the Fund's valuation.

The exchange rate risk related to investments is less than 10% of net assets.

#### For IC USD units (denominated in USD)

These units are exposed to exchange rate risk, given that they are denominated in a different currency from the benchmark index. Consequently, the net asset value of this class of units may decrease, despite an appreciation of the value of the benchmark index, due to fluctuations in exchange rates.

#### For IC USDH and IC CHFH units

For these units, which are denominated in a currency other than the euro, the risk associated with the fluctuation of the euro relative to their valuation currency is residual in nature due to the systematic hedging in place. This hedging may result in performance differentials between units denominated in different currencies.

IC USDH (denominated in USD) and IC CHFH (denominated in CHF) units will be systematically hedged against exchange rate risk.

All units have the same investment portfolio, in addition to which the IC USDH and IC CHFH units hedge against the exchange rate risk between the Swiss franc, the dollar and the euro.

- **Credit risk:**  
This is the potential risk that the credit ratings of public or private issuers may fall, which will have a negative impact on the share price and thus on the UCITS' net asset value.  
In the event of default or of a downgrading of the credit quality of issuers not anticipated by the markets, for example a downward re-rating by the financial rating agencies, the value of the bonds in which the UCITS is invested will fall, causing the UCITS' net asset value to fall.
- **Interest-rate risk:**  
The unitholder is exposed to interest rate risk because of the UCITS' investment in bond UCIs. Interest rate risk is the risk that bond market interest rates may rise, which would cause bond prices and consequently the Fund's net asset value to fall. Exposure to interest rate risk will not exceed 10% of the Fund's net assets.
- **Counterparty risk:**  
Counterparty risk is associated with the conclusion of over-the-counter financial futures contracts. It consists of assessing the risks for an entity in terms of its commitments with respect to the counterparty with which the agreement has been concluded. It therefore refers to the risk that the counterparty may default, causing it to default on payment. In accordance with the regulations, this risk may not exceed 10% of the Fund's net assets per counterparty.
- **Sustainability risks:**  
Sustainability risk, introduced by Regulation (EU) 2019/2088 (SFDR), is defined as any environmental, social or governance (ESG) event or situation that, were it to manifest, could cause an actual or potential material negative impact on the value of an investment. The sustainability risk management policy is defined in the ESG Methodology available on the Management Company's website ([www.groupama-am.com/oth/en/institutional/sustainable-finance](http://www.groupama-am.com/oth/en/institutional/sustainable-finance)).
- **Management policy for liquidity risk:**

Management of the Fund's liquidity risk is undertaken as part of an analysis and monitoring procedure that relies on internal tools and methodologies in place within Groupama Asset Management.

This procedure has two main components:

- monitoring the portfolio's liquidity profile based on an asset liquidity assessment in view of current market conditions, and
- monitoring the Fund's ability, whether in normal or unfavourable market conditions, to deal with significant redemption scenarios.

#### **Guarantee or protection**

N/A

#### **Eligible subscribers and typical investor profile**

ZC units: reserved for Institutional investors, in particular insurance companies marketing life insurance contracts

NC units: open to all subscribers.

IC USD units: reserved for institutional investors.

IC units: reserved for institutional investors.

IC USDH units: reserved for institutional investors.

IC CHFH units: reserved for institutional investors.

I2C units: reserved for institutional investors.

VA units: reserved for institutional investors.

GA units: reserved for companies, subsidiaries and regional mutuals of Groupama Assurances Mutuelles.

OSC units: reserved for UCIs and mandates managed by Groupama Asset Management or its subsidiaries that are part of the Opale range.

OAC units: reserved for UCIs and mandates managed exclusively by Groupama Asset Management or its subsidiaries within the Oxygène range.

RC units: reserved for investors subscribing via distributors or intermediaries providing advisory services within the meaning of the MiFID II European regulation, individual portfolio management services under mandate and when they are exclusively remunerated by their clients.

**Minimum initial subscription amount:**

- ZC units: €150,000.
- NC units: €500
- IC units: one thousandth of a unit
- IC USD units: one thousandth of a unit
- IC USDH units: one thousandth of a unit
- IC CHFH units: one thousandth of a unit
- I2C units: one thousandth of a unit
- VA units: €15,000,000
- GA units: €300,000
- OSC units: one thousandth of a unit
- OAC units: one thousandth of a unit
- RC units: €500

GROUPAMA AVENIR EURO is aimed at investors seeking to enhance their savings via equity markets in eurozone countries. Investors wish to adopt an aggressive approach through equity investment.

The recommended investment period is more than five years.

Proportion suitable for investment in the OPCVM: all equity investments may be subject to significant fluctuations. The amount that might reasonably be invested in the GROUPAMA AVENIR EURO mutual fund should be determined with reference to the investor’s personal situation. To determine this, investors should consider their personal wealth, their needs at the present time and over the next five years and the level of risk they are willing to accept.

Investors are also advised to diversify their investments sufficiently to avoid being exposed exclusively to the risks of this UCITS.

Investment diversification: this should be achieved by investing in different classes of assets (money-market instruments, bonds and equities) and in specific sectors and different geographical regions so as to spread risks more effectively and optimise portfolio management by taking market trends into account.

**Methods for determining and allocating distributable income**

This UCITS is a multi-class fund:

- ZC, NC, IC, IC USD, IC USDH, IC CHFH, I2C, OSC, OAC and RC units: accumulation.
  - o VA units: accumulation and/or distribution
  - o GA units: accumulation and/or distribution. Option to pay interim dividends. Option to carry forward earnings in full or in part.

**Characteristics of the units**

	<b>Initial net asset value</b>	<b>Base currency</b>	<b>Fractioning</b>
GA unit	EUR 10,000	EUR	One thousandth of a unit
I2C unit	EUR 1,000	EUR	One thousandth of a unit
IC unit	EUR 10,000	EUR	One thousandth of a unit
IC CHFH unit:	CHF 10,000	CHF	One thousandth of a unit
IC USD unit	USD 10,000	USD	One thousandth of a unit
IC USDH unit	USD 10,000	USD	One thousandth of a unit
NC unit	EUR 500	EUR	One ten-thousandth of a unit
OAC unit	EUR 10,000	EUR	One thousandth of a unit
OSC unit	EUR 10,000	EUR	One thousandth of a unit
RC unit	EUR 500	EUR	One ten-thousandth of a unit
VA unit	EUR 10,000	EUR	One thousandth of a unit
ZC unit	EUR 1,524.49	EUR	One ten-thousandth of a unit

**Subscription and redemption procedures**

Orders are executed in accordance with the table below:

D	D	D	D+1 business day	D+2 business days	D+2 business days
Clearing of subscription orders before 11:00 a.m. (1)	Clearing of redemption orders before 11:00 a.m. (1)	Execution of the order no later than D	Publication of the net asset value	Settlement of subscriptions	Settlement of redemptions

(1) Unless you have agreed a specific deadline with your financial institution.

Subscription and redemption requests are cleared and received by CACEIS Bank on each business day until 11 noon:

- with CACEIS Bank, for bearer or administered registered units,
- with CACEIS Bank Luxembourg Branch for bearer or administered registered units and for clientèle for whom it ensures custody account-keeping,
- at Groupama Asset Management for pure registered units.

They are executed on an unknown net asset value basis with settlement on D+2 Euronext Paris.

Unitholders are reminded that, when sending instructions to marketing agents other than the organisations indicated above, they must take account of the fact that the clearing cut-off time imposed by CACEIS Bank applies to these marketing agents. Consequently, such marketing agents may stipulate their own cut-off time, which may precede the cut-off time mentioned above, so that instructions can be sent to CACEIS Bank on time.

The Fund's net asset value is calculated on every trading day, except on official French public holidays. The reference calendar is that of the Paris Stock Exchange.

The net asset value may be obtained from the offices of Groupama Asset Management.

Units may be subscribed in exact amounts or in ten-thousandths of a unit for ZC, NC and RC classes.

Units may be subscribed in exact amounts or in thousandths of a unit for IC, IC USD, IC USDH, IC CHFH, I2C, VA, GA, OSC and OAC units.

Units may be redeemed in exact amounts or in ten-thousandths of a unit for ZC, NC and RC classes.

Units may be redeemed in exact amounts or in thousandths of a unit for IC, IC USD, IC USDH, IC CHFH, I2C, VA, GA, OSC and OAC units.

- Minimum initial subscription amount
  - o ZC units: €150,000.
  - o NC and RC units: €500
  - o IC, IC USD, IC USDH, IC CHFH and I2C units: one thousandth of a unit.
  - o VA units: €15,000,000.
  - o GA units: €300,000.
  - o OSC and OAC units: one thousandth of a unit.

#### Provision of redemption caps or gates:

Groupama Asset Management may implement gates to allow redemption requests from UCITS unitholders to be spread over several net asset values if they exceed a certain level, determined objectively.

- Description of the method used:  
UCITS unitholders are reminded that the threshold for triggering gates corresponds to the relationship between:
  - o the difference recorded, on a single clearing date, between the number of UCITS units for which redemption is requested, or the total amount of these redemptions, and the number of UCITS units for which subscription is requested, or the total amount of these subscriptions; and
  - o the net assets or the total number of UCITS units.

If the UCITS has several unit classes, the triggering threshold of the procedure will be the same for all UCITS unit classes.

The threshold above which the gates may be triggered is justified by the frequency at which the net asset value of the UCITS is calculated, its management orientation and the liquidity of the assets it holds. This is set at 5% of the net assets of the UCITS and applies to redemptions cleared for all UCITS assets and not specifically to the UCITS unit classes.

When the redemption requests exceed the threshold for triggering gates, Groupama Asset Management may decide to honour redemption requests beyond the set cap, and to execute in part or in full those orders which might be blocked.

The maximum duration of the application of the gates is fixed at the equivalent of 20 net asset values for three months.

- Methods of providing information to unitholders:  
In the event the gates mechanism is activated, all UCITS unitholders will be informed by any means, through the website of Groupama Asset Management, [www.groupama-am.com](http://www.groupama-am.com).  
UCITS unitholders whose orders have not been executed will be informed as quickly as possible in a specific way.
- Processing of non-executed orders:  
Redemption orders will be executed in the same proportions for UCITS unitholders who have requested redemption since the last clearing date. For non-executed orders, these will be automatically carried over to the next net asset value and will not have priority over the new redemption orders placed for execution on the basis of the next net asset value. In any case, redemption orders which are not executed and are automatically carried over may not be revoked by UCITS unitholders.
- Example illustrating the system that has been partially set up:  
For example, if the total redemption orders for UCITS units is 10% while the triggering threshold is set at 5% of the net assets, Groupama Asset Management may decide to honour redemption orders up to 7.5% of the net assets (and therefore execute 75% of redemption orders as opposed to 50% if the 5% cap was strictly applied).

#### Swing pricing mechanism:

Groupama Asset Management has chosen to implement a swing pricing mechanism pursuant to the procedures recommended by the AFG Charter to protect the Fund and its long-term investors from the effects of high inflows or outflows of capital.

If the net amount of subscription or redemption in the UCITS exceeds a threshold previously set by Groupama Asset Management, the net asset value of the Fund will be increased or reduced by a percentage intended to offset UCITS costs incurred by the investment or disinvestment of this amount and to ensure that these costs are not charged to the other investors in the UCITS.

The triggering threshold and the extent of the swing of the net asset value are specific to the UCITS and are audited quarterly by a "Swing Price" committee. This committee may change the parameters of the swing pricing mechanism at any time, particularly in the event of a crisis on the financial markets.

The management company determines whether it should adopt a partial swing or a full swing. In the case of a partial swing, the net asset value of each unit class in the UCITS will be increased or decreased when net subscriptions or redemptions respectively exceed a certain threshold (the "Swing Threshold"), which the management company sets for each UCI. In the case of a full swing, no swing threshold will be applied. The swing factor will have the following effects on subscriptions and redemptions:

When, for a given Valuation Day, a UCI is in a net subscription situation (i.e. in terms of value, subscriptions exceed redemptions) (above the Swing Threshold, where applicable), the net asset value of each unit class of the UCI will be revised upwards using the swing factor; and

When, for a given Valuation Day, a UCI is in a net redemption situation (i.e. in terms of value, redemptions exceed subscriptions) (above the Swing Threshold, where applicable), the net asset value of each unit class in the UCI will be revised downwards using the swing factor.

When applying the swing pricing method, the volatility of the net asset value of each unit class may not reflect the real performance of the portfolio (and thus, where applicable, may differ from the UCITS' benchmark index).

### Charges and fees

The Management Company is required to pay a share of the UCI's management fees as remuneration to intermediaries such as investment firms, insurance companies, management companies, marketing intermediary structurers, distributors or distribution platforms with which an agreement has been signed in connection with distribution work, UCI unit investment or relations with other investors. This remuneration is variable and depends on the terms of the business relationship with the intermediary. This remuneration may be flat-rate or calculated on the basis of the net assets subscribed as a result of the intermediary's work. In accordance with the applicable regulations, each intermediary will provide clients with any useful information on costs and fees and its remuneration.

#### - Subscription and redemption fees

Subscription fees increase the subscription price paid by the investor, while redemption fees reduce the redemption price. Fees paid to the UCITS are used to compensate the UCITS for the expenses incurred in the investment or divestment of its assets. The remaining fees accrue to the management company, marketing agent etc.

Unit class	Base	Subscription fee not accruing to the UCITS	Subscription fee accruing to the UCITS	Redemption fee not accruing to the UCITS	Redemption fee accruing to the UCITS
GA unit	Net asset value x Number of units or shares	Maximum rate: 4%	None	None	None
I2C unit	Net asset value x Number of units or shares	Maximum rate: 3%	None	None	None
IC unit	Net asset value x Number of units or shares	Maximum rate: 3%	None	None	None
IC CHFH unit:	Net asset value x Number of units or shares	Maximum rate: 3%	None	None	None
IC USD unit	Net asset value x Number of units or shares	Maximum rate: 3%	None	None	None
IC USDH unit	Net asset value x Number of units or shares	Maximum rate: 3%	None	None	None
NC unit	Net asset value x Number of units or shares	Maximum rate: 3%	None	None	None
OAC unit	Net asset value x Number of units or shares	Maximum rate: 4%	None	None	None
OSC unit	Net asset value x Number of units or shares	Maximum rate: 4%	None	None	None
RC unit	Net asset value x Number of units or shares	Maximum rate: 3%	None	None	None
VA unit	Net asset value x Number of units or shares	Maximum rate: 3%	None	None	None
ZC unit	Net asset value x Number of units or shares	Maximum rate: 3%	None	None	None

#### - Operating and management fees:

These fees include all fees charged directly to the UCITS, except for transaction expenses. Transaction costs include intermediary fees (e.g. brokerage fees, RTO, stock market taxes etc.) and any transaction fee that may be charged by the custodian.

The following operating and management fees may also be charged:

- o performance fees. These reward the management company if the UCITS exceeds its objectives. They are therefore charged to the UCITS;

For more information on the ongoing charges charged to the UCITS, refer to the "Fees" section of the Key Information Document (KID)

GA unit

<b>Fees charged to the UCITS</b>	<b>Base</b>	<b>Rate/rate scale</b>
Financial management fees	Net assets	Maximum rate: 0.6% incl. tax
Operating fees and other service fees (fees for registering and listing funds, custodian fees, audit fees, taxation, fees related to compliance with regulatory obligations and regulatory reporting, operational costs etc.)	Net assets	Rates: 0.12% incl. tax
Maximum indirect fees (management fees and charges)	Net assets	Not significant
Transaction fee accruing to the custodian, CACEIS BANK	Deducted from each transaction	Transferable securities: None Foreign exchange transaction: €10 incl. tax OTC product: from €10 to €150* incl. tax depending on complexity
Performance fee	Net assets	None

#### I2C unit

<b>Fees charged to the UCITS</b>	<b>Base</b>	<b>Rate/rate scale</b>
Financial management fees	Net assets	Maximum rate: 1.4% incl. tax
Operating fees and other service fees (fees for registering and listing funds, custodian fees, audit fees, taxation, fees related to compliance with regulatory obligations and regulatory reporting, operational costs etc.)	Net assets	Rates: 0.12% incl. tax
Maximum indirect fees (management fees and charges)	Net assets	Not significant
Transaction fee accruing to the custodian, CACEIS BANK	Deducted from each transaction	Transferable securities: None Foreign exchange transaction: €10 incl. tax OTC product: from €10 to €150* incl. tax depending on complexity
Performance fee	Net assets	15% of the outperformance of the MSCI World Small Cap Index (net dividends reinvested)

#### IC unit

<b>Fees charged to the UCITS</b>	<b>Base</b>	<b>Rate/rate scale</b>
Financial management fees	Net assets excluding UCIs	Maximum rate: 1.4% incl. tax
Operating fees and other service fees (fees for registering and listing funds, custodian fees, audit fees, taxation, fees related to compliance with regulatory obligations and regulatory reporting, operational costs etc.)	Net assets	Rates: 0.12% incl. tax
Maximum indirect fees (management fees and charges)	Net assets	Not significant
Transaction fee accruing to the custodian, CACEIS BANK	Deducted from each transaction	Transferable securities: None Foreign exchange transaction: €10 incl. tax OTC product: from €10 to €150* incl. tax depending on complexity
Performance fee	Net assets	None

IC CHFH unit:

<b>Fees charged to the UCITS</b>	<b>Base</b>	<b>Rate/rate scale</b>
Financial management fees	Net assets excluding UCIs	Maximum rate: 1.4% incl. tax
Operating fees and other service fees (fees for registering and listing funds, custodian fees, audit fees, taxation, fees related to compliance with regulatory obligations and regulatory reporting, operational costs etc.)	Net assets	Rates: 0.12% incl. tax
Maximum indirect fees (management fees and charges)	Net assets	Not significant
Transaction fee accruing to the custodian, CACEIS BANK	Deducted from each transaction	Transferable securities: None Foreign exchange transaction: €10 incl. tax OTC product: from €10 to €150* incl. tax depending on complexity
Performance fee	Net assets	None

IC USD unit

<b>Fees charged to the UCITS</b>	<b>Base</b>	<b>Rate/rate scale</b>
Financial management fees	Net assets excluding UCIs	Maximum rate: 1.4% incl. tax
Operating fees and other service fees (fees for registering and listing funds, custodian fees, audit fees, taxation, fees related to compliance with regulatory obligations and regulatory reporting, operational costs etc.)	Net assets	Rates: 0.12% incl. tax
Maximum indirect fees (management fees and charges)	Net assets	Not significant
Transaction fee accruing to the custodian, CACEIS BANK	Deducted from each transaction	Transferable securities: None Foreign exchange transaction: €10 incl. tax OTC product: from €10 to €150* incl. tax depending on complexity
Performance fee	Net assets	None

IC USDH unit

<b>Fees charged to the UCITS</b>	<b>Base</b>	<b>Rate/rate scale</b>
Financial management fees	Net assets excluding UCIs	Maximum rate: 1.4% incl. tax
Operating fees and other service fees (fees for registering and listing funds, custodian fees, audit fees, taxation, fees related to compliance with regulatory obligations and regulatory reporting, operational costs etc.)	Net assets	Rates: 0.12% incl. tax
Maximum indirect fees (management fees and charges)	Net assets	Not significant
Transaction fee accruing to the custodian, CACEIS BANK	Deducted from each transaction	Transferable securities: None Foreign exchange transaction: €10 incl. tax OTC product: from €10 to €150* incl. tax depending on complexity
Performance fee	Net assets	None

NC unit

<b>Fees charged to the UCITS</b>	<b>Base</b>	<b>Rate/rate scale</b>
Financial management fees	Net assets excluding UCIs	Maximum rate: 1.9% incl. tax
Operating fees and other service fees (fees for registering and listing funds, custodian fees, audit fees, taxation, fees related to compliance with regulatory obligations and regulatory reporting, operational costs etc.)	Net assets	Rates: 0.12% incl. tax
Maximum indirect fees (management fees and charges)	Net assets	Not significant
Transaction fee accruing to the custodian, CACEIS BANK	Deducted from each transaction	Transferable securities: None Foreign exchange transaction: €10 incl. tax OTC product: from €10 to €150* incl. tax depending on complexity
Performance fee	Net assets	None

OAC unit

<b>Fees charged to the UCITS</b>	<b>Base</b>	<b>Rate/rate scale</b>
Financial management fees	Net assets	Maximum rate: 0.1% incl. tax
Operating fees and other service fees (fees for registering and listing funds, custodian fees, audit fees, taxation, fees related to compliance with regulatory obligations and regulatory reporting, operational costs etc.)	Net assets	Rates: 0.12% incl. tax
Maximum indirect fees (management fees and charges)	Net assets	Not significant
Transaction fee accruing to the custodian, CACEIS BANK	Deducted from each transaction	Transferable securities: None Foreign exchange transaction: €10 incl. tax OTC product: from €10 to €150* incl. tax depending on complexity
Performance fee	Net assets	15% of the outperformance of the MSCI World Small Cap Index (net dividends reinvested)

OSC unit

<b>Fees charged to the UCITS</b>	<b>Base</b>	<b>Rate/rate scale</b>
Financial management fees	Net assets	Maximum rate: 0.1% incl. tax
Operating fees and other service fees (fees for registering and listing funds, custodian fees, audit fees, taxation, fees related to compliance with regulatory obligations and regulatory reporting, operational costs etc.)	Net assets	Rates: 0.12% incl. tax
Maximum indirect fees (management fees and charges)	Net assets	Not significant
Transaction fee accruing to the custodian, CACEIS BANK	Deducted from each transaction	Transferable securities: None Foreign exchange transaction: €10 incl. tax OTC product: from €10 to €150* incl. tax depending on complexity
Performance fee	Net assets	None

RC unit

<b>Fees charged to the UCITS</b>	<b>Base</b>	<b>Rate/rate scale</b>
Financial management fees	Net assets excluding UCIs	Maximum rate: 1.5% incl. tax
Operating fees and other service fees (fees for registering and listing funds, custodian fees, audit fees, taxation, fees related to compliance with regulatory obligations and regulatory reporting, operational costs etc.)	Net assets	Rates: 0.12% incl. tax
Maximum indirect fees (management fees and charges)	Net assets	Not significant
Transaction fee accruing to the custodian, CACEIS BANK	Deducted from each transaction	Transferable securities: None Foreign exchange transaction: €10 incl. tax OTC product: from €10 to €150* incl. tax depending on complexity
Performance fee	Net assets	None

VA unit

<b>Fees charged to the UCITS</b>	<b>Base</b>	<b>Rate/rate scale</b>
Financial management fees	Net assets excluding UCIs	Maximum rate: 1.4% incl. tax
Operating fees and other service fees (fees for registering and listing funds, custodian fees, audit fees, taxation, fees related to compliance with regulatory obligations and regulatory reporting, operational costs etc.)	Net assets	Rates: 0.12% incl. tax
Maximum indirect fees (management fees and charges)	Net assets	Not significant
Transaction fee accruing to the custodian, CACEIS BANK	Deducted from each transaction	Transferable securities: None Foreign exchange transaction: €10 incl. tax OTC product: from €10 to €150* incl. tax depending on complexity
Performance fee	Net assets	None

ZC unit

<b>Fees charged to the UCITS</b>	<b>Base</b>	<b>Rate/rate scale</b>
Financial management fees	Net assets excluding UCIs	Maximum rate: 1.5% incl. tax
Operating fees and other service fees (fees for registering and listing funds, custodian fees, audit fees, taxation, fees related to compliance with regulatory obligations and regulatory reporting, operational costs etc.)	Net assets	Rates: 0.12% incl. tax
Maximum indirect fees (management fees and charges)	Net assets	Not significant
Transaction fee accruing to the custodian, CACEIS BANK	Deducted from each transaction	Transferable securities: None Foreign exchange transaction: €10 incl. tax OTC product: from €10 to €150* incl. tax depending on complexity
Performance fee	Net assets	None

Operating fees and other service fees: in the case of a flat fee, the actual operating fees and other service fees could be higher than the maximum authorised flat rate, in which case the management company will bear the excess.

Indirect costs: specified if the UCIs held in the portfolio account for more than 20%, otherwise not significant.

Any exceptional legal costs related to recovery of the UCITS' receivables may be added to the fees detailed above.

The portfolio's management strategy may benefit from third-party research services borne by the UCITS.

The contribution to the AMF will also be borne by the UCITS.

**Principles applicable to performance fees:**

- General principles:

The performance fee is provisioned on each net asset value calculation date and charged upon calculation of the final NAV (net asset value) for each financial year.

The calculation method used is the “daily variation” model, which seeks to adjust the total provisioned balance when each NAV is calculated, based on the UCITS’ performance vis-à-vis the benchmark index since the previous NAV.

A benchmark asset is determined at each valuation of the UCITS. It represents the UCITS’ assets restated for subscription/redemption amounts and valued on the basis of the performance of the benchmark index since the most recent valuation.

Where the UCITS’ valued assets, net of any fees, have outperformed the benchmark asset since the most recent NAV, an amount representing this difference to which the performance fee mentioned in the fee table is applied will be added to the balance provisioned for performance fees. On the contrary, where the benchmark asset outperforms the UCITS’ assets between two NAV calculation dates, a write-back of the same percentage of the difference between the valued assets and the benchmark assets will be made. The total provisioned balance cannot be negative, so write-backs are capped at the value of existing provisions. Nevertheless, a theoretical negative balance will be noted so that future variable fees will only be provisioned once the underperformance recorded has been completely offset.

For redemptions, the portion of the provision for variable management fees corresponding to the number of units redeemed accrues in full to the management company.

In the event that no performance fee has been provisioned by the end of a reference period due to an underperformance vis-à-vis the benchmark index, the reference period will be extended to the following financial year with provision amounts calculated in the same way. Performance fees will therefore be provisioned in the new financial year only if past underperformance has been completely offset.

After five years without a performance fee (overall underperformance over five years), the calculation mechanism no longer takes into account uncompensated underperformance before the five years, as illustrated in the second table below.

Unless otherwise specified, the only criteria for calculating performance fees is a positive relative performance of the UCITS compared to the benchmark index. Therefore, it is possible that performance fees may be paid even in the case of negative absolute performance.

As an exception, certain units are subject to a positivity constraint. In such cases, performance fees are only charged if the UCITS’ performance is positive. This means, in particular, that no performance fee may be charged in the case of a negative performance of the unit over the reference period.

- Figure 1: General operation

	Year 1	Year 2	Year 3	Year 4	Year 5
<b>Performance of the Fund units</b>	10%	5%	-7%	6%	3%
<b>Performance of the benchmark index</b>	5%	4%	-3%	4%	0%
<b>Out/underperformance</b>	5%	1%	-4%	2%	3%
<b>Cumulative performance of the Fund over the observation period</b>	10%	5%	-7%	-1%	2%
<b>Cumulative performance of the benchmark index over the observation period</b>	5%	4%	-3%	1%	1%
<b>Cumulative out/underperformance over the observation period</b>	5%	1%	-4%	-2%	1%
<b>Fee charged?</b>	Yes	Yes	No, because the UCITS has underperformed compared to the benchmark index	No, because the UCITS has underperformed over the entirety of the current observation period, which began in year 3	Yes
<b>Start of a new observation period?</b>	Yes, a new observation period begins in year 2	Yes, a new observation period begins in year 3	No, the observation period is extended to cover years 3 and 4	No, the observation period is extended to cover years 3, 4 and 5	Yes, a new observation period begins in year 6

- Figure 2: How uncompensated performance is handled beyond year 5

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
<b>Performance of the Fund units</b>	0%	5%	3%	6%	1%	5%
<b>Performance of the benchmark index</b>	10%	2%	6%	0%	1%	1%
<b>A: Out/underperformance for the current year</b>	-10%	3%	-3%	6%	0%	4%
<b>B1: Year 1 uncompensated underperformance carryforward</b>	N/A	-10%	-7%	-7%	-1%	Out of scope
<b>B2: Year 2 uncompensated underperformance carryforward</b>	N/A	N/A	0%	0%	0%	0%
<b>B3: Year 3 uncompensated underperformance carryforward</b>	N/A	N/A	N/A	-3%	-3%	-3%
<b>B4: Year 4 uncompensated underperformance carryforward</b>	N/A	N/A	N/A	N/A	0%	0%
<b>B5: Year 5 uncompensated underperformance carryforward</b>	N/A	N/A	N/A	N/A	N/A	0%
<b>Out/underperformance observation period</b>	-10% (A)	-7% (A + B1)	-10% (A + B1 + B2)	-4% (A + B1 + B2 + B3)	-4% (A + B1 + B2 + B3 + B4)	1% (A + B2 + B3 + B4 + B5)
<b>Fee charged?</b>	No	No	No	No	No	Yes

Further details about the method for calculating variable management fees are available from Groupama Asset Management.

- Selection of intermediaries:

Fund managers have a list of authorised brokers. A Broker Committee meets every six months to assess fund managers' evaluations of brokers and the entire value-added chain (analysts, middle office etc.), as well as to propose the inclusion of new brokers and/or the exclusion of others.

Based on their expertise, each Fund manager reports on the following criteria:

- o quality of order execution prices,
- o liquidity offered,
- o broker longevity,
- o quality of analysis etc.

- Tax system:

Note: Depending on your tax system, capital gains and income resulting from ownership of the UCITS's units may be subject to tax.

We recommend that you seek advice on this subject from your tax advisor.

Switching from one unit class to another is treated as a sale and may be subject to capital gains tax.

## 4. Commercial information

Information relating to the Fund may be obtained by writing to:

Groupama Asset Management  
25 rue de la Ville-l'Évêque, 75008 Paris, France  
or from the website: <http://www.groupama-am.com>

The UCITS' net asset value is available on the website or from the offices of Groupama Asset Management

The latest annual and interim documents are available to unitholders on request from:

Groupama Asset Management  
25 rue de la Ville-l'Évêque, 75008 Paris, France

Subscription and redemption requests are cleared by CACEIS Bank at the following address:

CACEIS Bank  
89-91 rue Gabriel Péri, 92120 Montrouge, France

Information on environmental, social and governance quality criteria (ESG)

Further information regarding the way the management company takes ESG criteria into account is available in the UCITS' annual report and on the website of the management company Groupama Asset Management ([www.groupama-am.com](http://www.groupama-am.com)).

Information on the management company's voting rights:

Groupama Asset Management's voting policy and its report on voting rights are available on the [www.groupama-am.com](http://www.groupama-am.com) website.

## 5. Investment rules

The UCITS complies with the regulatory ratios applicable to UCITS, as defined by the French Monetary and Financial Code.

## 6. Overall risk

The overall risk of this UCITS is determined using the commitment approach.

## 7. Asset valuation and accounting rules

### 7.1 Valuation methods

#### Securities traded on a French or foreign regulated market, including ETFs

Securities traded in the eurozone:

Last price on the valuation day.

For fixed-income products, the management company reserves the right to use consensus prices when these are more representative of the trading value.

International securities denominated in currencies other than the euro are converted into euro at the exchange rate in Paris on the valuation day.

Securities for which a price has not been calculated on the valuation day are valued at the last officially published price. Securities for which the price has been adjusted are valued at their likely trading price, as determined by the Fund manager or the management company.

#### UCI shares and securities

Units or shares of UCIs are valued at their last known net asset value.

#### Negotiable debt securities

Negotiable debt securities are valued in accordance with the following rules:

Fixed-rate annual interest treasury bills (BTANs) and fixed-rate treasury bills (BTFs) are valued on the basis of the day's prices published by the Banque de France. Other negotiable debt securities (short- and medium-term negotiable securities, bills issued by financial institutions, bills issued by specialist financial institutions) are valued:

- on the basis of the actual market price;
- in the absence of a meaningful market price, by applying an actuarial method to increase the reference price by a margin reflecting the intrinsic characteristics of the issuer. If the issuer's situation changes significantly, this margin may be adjusted over the period during which the security is held.

#### Over-the-counter transactions

Transactions agreed on over-the-counter markets and authorised by the regulations applicable to UCIs are valued at their market value.

#### Futures and options contracts

Futures contracts on derivatives markets are valued at the day's settlement price.

Options on derivatives markets are valued at the day's closing price.

#### Temporary acquisitions and sales of securities

- Temporary acquisitions of securities  
Securities received under repurchase agreements or borrowed securities are entered in the long portfolio under "Receivables representing securities received under repurchase agreements or borrowed securities" at the amount provided for in the contract, plus interest receivable.
- Temporary sales of securities  
Securities sold under repurchase agreements or loaned securities are entered in the portfolio and valued at their current value.  
The debt representing securities transferred under repurchase agreements (such the debt representing loaned securities) is entered in the selling portfolio at the value set in the contract plus accrued interest. On settlement, the interest received or paid is recognised as income from receivables.
- Collateral and margin calls  
Collateral received is valued at the market price (mark-to-market).  
Daily fluctuation margins are calculated using the difference between the valuation at market price of collateral provided and the valuation at market price of collateralised instruments.

#### Valuation methods for off-balance-sheet commitments:

Futures contracts are valued at nominal value x quantity x settlement price x (currency)

Options contracts are valued at their underlying equivalent

Swaps

Asset-backed or non-asset-backed swaps

Commitment = nominal value + valuation of the fixed-rate leg (if fixed/variable) or the variable-rate leg (if variable/fixed) at the market price.

Other swaps

Commitment = nominal value + market value (if the UCITS has adopted a synthetic valuation method).

7.2 Method used to recognise income from fixed-income securities

Accrued interest method.

7.3 Method used to recognise expenses

Transactions are accounted for exclusive of costs.

## 8. Remuneration

Details of the updated remuneration policy are available on the Groupama Asset Management website at [www.groupama-am.com](http://www.groupama-am.com).

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