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**UCITS governed by European Directive 2009/65/EC**

# PROSPECTUS

***The shares or units of the fund mentioned herein ("the Fund") 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").***



## 1 GENERAL CHARACTERISTICS

**Name**

**GROUPAMA AXIOM LEGACY 21**

**Legal form and Member State in which the Fund was incorporated**

French mutual fund ("*Fonds Commun de Placement*", FCP).

**Date formed and expected term**

31 May 2017.
This Fund was initially formed for a 99-year term.

## Summary of the management offer

| Unit class | ISIN code | Eligible subscribers | Allocation of distributable income | Base currency | Minimum initial subscription | Initial net asset value |
|---|---|---|---|---|---|---|
| G units | FR0013259140 | Reserved for Groupama SA companies, subsidiaries and regional mutuals | Accumulation and/or distribution and/or carried forward | Euro | €300,000 | €1,000 |
| I units | FR0013259132 | Reserved for institutional investors for whom the Groupama Group and its external distributors are the marketing agents | Accumulation | Euro | €100,000 | €1,000 |
| J units | FR0013259165 | Reserved for institutional investors for whom Axiom Alternative Investments is the marketing agent | Accumulation | Euro | €100,000 | €1,000 |
| JD units | FR0013302833 | Reserved for institutional investors for whom Axiom Alternative Investments is the marketing agent | Distribution | Euro | €100,000 | €1,000 |
| JS units | FR0013303492 | Reserved for institutional investors for whom Axiom Alternative Investments is the marketing agent | Accumulation | Swiss franc hedged | CHF 100,000 | CHF 1,000 |
| JU units | FR0013303484 | Reserved for institutional investors for whom Axiom Alternative Investments is the marketing agent | Accumulation | US dollars hedged | $100,000 | $1,000 |
| L units | FR0013259173 | Reserved for subscribers for whom Axiom Alternative Investments is the marketing agent | Accumulation | Euro | 1 unit | €1,000 |
| N units | FR0013259181 | Open to all subscribers | Accumulation | Euro | 1 unit | €1,000 |
| O units | FR0013259199 | Reserved for UCIs and mandates managed by Groupama Asset Management or its subsidiaries that are part of the Opale range and the UCIs or mandates managed by Axiom Alternative Investments | Distribution | Euro | 1 unit | €1,000 |
| P units | FR0013251881 | Reserved for institutional investors | Accumulation | Euro | €10,000,000 | €1,000 |
| R units | FR0013302858 | Reserved for investors subscribing via distributors or intermediaries connected to Groupama Asset Management providing advisory services as defined by the MiFID II European regulations, or individual portfolio management services under mandate when they are exclusively remunerated by their clients | Accumulation | Euro | 1 unit | €1,000 |

| Unit class | ISIN code | Eligible subscribers | Allocation of distributable income | Base currency | Minimum initial subscription | Initial net asset value |
|---|---|---|---|---|---|---|
| T units | FR0013302874 | Reserved for investors subscribing via distributors or intermediaries connected to Axiom Alternative Investments providing advisory services as defined by the MiFID II European regulations, or individual portfolio management services under mandate when they are exclusively remunerated by their clients | Accumulation | Euro | 1 unit | €1,000 |
| U units (1) | FR0013277738 | Reserved for institutional investors for whom Axiom Alternative Investments is the marketing agent | Accumulation | British pound hedged | GBP 100,000 | GBP 1,000 |

(1) U units are hedged against the exchange rate risk of the Fund's reference currency.

### Address from which the latest annual report and interim financial statement may be obtained

Investors 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'Evêque – 75008 Paris – France

And

Axiom Alternative Investments

39, Avenue Pierre 1er de Serbie – 75008 Paris – France

Tel.: +33 (0)1.44.69.43.90

Any additional information that may be required can be obtained from Axiom Alternative Investments.

## 2 ADMINISTRATORS

### Management company

**Groupama Asset Management** – 25 rue de la Ville l'Evêque, 75008 Paris, France, a portfolio management company authorised by the *Commission des opérations de bourse* (Stock Exchange Committee), now the *Autorité des marchés financiers* (French financial markets authority – AMF) under number GP 93-02 on 5 January 1993.

### Depositary – Custodian – Clearing house for subscriptions/redemptions by delegation of the management company - Liability accounting

**Caceis Bank** – 1-3 place Valhubert, 75013 Paris, France, a credit institution authorised by the CECEI (now the ACPR, French Prudential Supervisory and Resolution Authority) on 1 April 2005.

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

The custodian is also responsible for the UCI's fund accounting, covering the clearance of subscription and redemption orders for the UCI's units and management of the unit registry.

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.

Updated information is made available to investors upon request.

**Institutions appointed to receive subscriptions and redemptions, and responsible for adhering to the centralised processing cut-off time indicated in the prospectus**

- **Caceis Bank**
- **Orange Bank** on behalf of clients for whom it holds custody-accounts.

**Statutory auditor**

**PWC Sellam -** 2 rue Vatimesnil - 92300- Levallois-Perret.

**Representatives**

**The financial representative for all managed assets**

**Axiom Alternative Investments** – 39, Avenue Pierre 1er de Serbie, 75008 Paris, France, a limited liability company approved as a portfolio management company by the AMF under no. GP06000039 on 1 December 2006.

**Accounting representative**

**CACEIS Fund Administration France –** 1-3 place Valhubert, 75013 Paris, France, a credit institution authorised by the CECEI (now the ACPR – *Autorité de Contrôle Prudentiel et de Résolution*, the French Prudential Supervisory and Resolution Authority) on 1 April 2005.

**Marketing agents**

- Groupama Asset Management
- GROUPAMA SA's distribution networks, 8-10 rue d'Astorg, 75008 Paris, France.
- Axiom Alternative Investments
- External distributors authorised by Groupama Asset Management and by Axiom Alternative Investments.

**Conflict of interests 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 interests management policy available on request from your usual advisor or on the Management Company's website www.groupama-am.com.

# 3 MANAGEMENT AND OPERATING 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 Fund's assets in proportion to the number of units held.

Entry in a register or clarification of fund accounting methods:

Fund accounting for liabilities is provided by the custodian.

The Fund is listed on Euroclear France.

Voting rights:

No voting rights are attached to the units, as decisions are made by Axiom Alternative Investments.

Type of units:

Units are registered and/or bearer units.

Fractioning:

Units may be subscribed or redeemed in amounts or in thousandths of a unit.

**Financial year end**

The last Paris Stock Exchange trading day in December.

The first financial year end was the last Paris stock exchange trading day in December 2017.

**Tax system**

The Fund 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 Fund.

The tax treatment of any capital gains or income from holding UCITS fund units depends on tax provisions specific to the unitholder's own particular circumstances and/or on the tax provisions in the country where the unitholder resides. Investors should seek professional financial advice.

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 of the unit classes:**

| | |
|---|---|
| G units | FR0013259140 |
| I units | FR0013259132 |
| J units | FR0013259165 |
| JD units | FR0013302833 |
| JS units | FR0013303492 |
| JU units | FR0013303484 |
| L units | FR0013259173 |

| | |
|---|---|
| N units | FR0013259181 |
| O units | FR0013259199 |
| P units | FR0013251881 |
| R units | FR0013302858 |
| T units | FR0013302874 |
| U units | FR0013277738 |

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

**Investment objective**

The Fund's objective is to try to obtain, over a recommended minimum investment horizon of 4 years, an annualised return equal to or greater than the 3-month Euribor index +3% after management costs have been deducted.

In order to achieve this objective, UCITS will invest mainly in financial institutions' bonds and preferred shares through totally discretionary management.

**Benchmark index**

No benchmark index is intended to be used to assess the Fund's performance, since the indexes available are not representative of the latter's management method, but the Fund's performance can still be compared with that of the 3-month Euribor +3%.

The Euribor index is the European money market rate. It is equal to the arithmetical average of rates available on the European banking market for a given maturity (between 1 week and 12 months). It is published by the European Central Bank from ratings provided each day by 64 European banks.

**Investment strategy**

Description of the strategies used:

The Fund's investment policy consists primarily of selecting bonds, debt securities or preferred shares issued by financial institutions.

The objective is to try to take advantage of the end of the Basel 2 to Basel 3 transition period (also referred to as the "Grandfathering Period") that applies to banks (up to December 2021), and also to invest in securities issued by insurance companies.

The entry into force of Basel 3 involves the declassification of debt securities issued previously by banks to meet their regulatory ratios. This declassification will therefore encourage issuers to redeem these securities or to make offers to exchange them at a premium compared to the market price.

The Axiom Alternative Investments investment process seeks to capitalise on these redemption and exchange operations being carried out on the international bond market. To optimise the portfolio's return, the investment process is organised into several phases:

- 1st phase: Fundamental analysis
    - The management team establishes criteria and extreme situations likely to affect the credit risk of each issuer based on information provided by the companies (reports, press releases and meetings), independent analyses and the analyses by research teams of major investment banks.
    - Only issues by companies deemed to have a long history, with a strong presence on the markets and with known and measurable competitive advantages are taken into account.
    - Detailed forecasting and stress scenarios are drawn up for the credit rates and spreads by rating category for major bond maturities.
    - Issues are selected by managers based on an in-depth analysis of the prospectuses.
    - The acquisition or transfer of bonds or debt securities is also based on an internal analysis of the issuer's credit risk.

- Second phase: Construction of the portfolio:
    - The portfolio is then constructed based on the risk allocation choices and the choices of issues made above.
    - The construction of the portfolio creates diversification, made possible by allocation by type of issuer.
    - Managers will be able to hedge the foreign exchange and interest rate risks. Indeed, some assets may be denominated in currencies other than the reference currency, and the (FCP) mutual fund will have a hedge against this systematic risk. However, there may be an ancillary risk.

- Third phase: Monitoring the portfolio
    - Regular monitoring of the performance of the underlying assets, through publications of statistics associated with issues.
    - Systematic monitoring of each sector's trends (issuer concentration, changes in legislation).
    - The circumstances likely to affect coupon payments or repayment of the principal are specifically monitored.

Both public and private sector issuers of bonds may be selected. Within these bonds, the Fund will prefer discounted orphan bond securities, fixed to fixed securities and long call securities, i.e., securities where the date of first call was made after the end of the transition period.

The acquisition or transfer of bonds or debt securities is based on an internal analysis of the issuer's credit risk by Axiom Alternative Investments. A line is not transferred or acquired based on the sole criterion of the rating provided by rating agencies.

The Fund may invest in bonds where the guaranteeing issuer or entity has an investment grade long-term rating as a minimum, or one deemed to be equivalent by Axiom Alternative Investments at the time of acquisition, and up to 20% on issuers that are not rated as investment grade or that are unrated.

Negotiable debt securities and bonds that are within the investment grade category correspond to securities with a rating higher than BBB- by Standard & Poor's, or Baa3 by Moody’s, or BBB- by Fitch Ratings (the lowest of these ratings will apply) or deemed equivalent by Axiom Alternative Investments.

The UCITS fund may invest up to a maximum amount of 20% of its net assets in Additional Tier1 bonds or contingent convertible bonds (CoCo bonds), issued by financial institutions, in order to achieve a potentially higher return linked to their subordination, in return for a higher risk.

CoCo bonds are hybrid debt and equity products: they are issued as debt but are automatically converted into shares when the financial institution (in this case) is in difficulty. The bonds will therefore be converted into shares at a predetermined price, at the time when the triggering criteria (level of losses, downgraded level of capital and of equity capital ratios, downward price earning ratio, etc.) are activated.

| | |
|---|---|
| Interest rate sensitivity range within which the Fund is managed | From 0 to 8 |
| Geographical area of the issuers of securities to which the Fund is exposed | OECD countries (all areas): 0 - 110%<br>Non-OECD countries (emerging countries): 0 - 10% |
| Currency of the securities in which the UCITS is invested | Euro: from 0 to 110% of net assets<br>Currencies other than the Euro: from 0 to 110% of net assets |
| Level of exchange rate risk borne by the Fund | Restricted to up to 10% of net assets |

- Management style:

  The Fund shall adopt an active management style that aims to achieve its management objective and optimise its performance.

Assets, excluding embedded derivatives:

- Interest rate market:

  The proportion of investments in interest rate products will be between 0% and 110% of net assets.

  - Bonds and other debt securities:

    The Fund will be invested in bonds issued by sovereign states, industrial, commercial and financial companies

    All financial instruments can be at a fixed, variable and/or revisable rate.

    These securities, issued by international issuers, may be conventional, unsecured or subordinate.

    The Fund may invest in securities where the guaranteeing issuer or entity is categorised as investment grade or a category deemed to be equivalent by Axiom Alternative Investments and up to 20% of its net assets in high-yield issuers (so-called “speculative”) or unrated issuers.

  - Money market instruments:

    During periods when the investment strategy may lead the management team to reduce the Fund’s exposure to bonds and/or other debt instruments in order to achieve the management objective, up to 100% of the Fund may be exposed to short-term negotiable securities and euro commercial papers.

    These financial instruments may also be used on an ancillary basis, for up to 10% of net assets, for investing cash and cash equivalents.

- Equity market:

  The Fund's share exposure will not exceed 50% of its net assets.

  The UCITS fund may invest up to 50% of its net assets in preferred shares or preference shares and may invest up to 10% of its net assets in conventional shares.

  "Preferred shares" are shares that give on a priority basis a defined entitlement to a fixed dividend. This dividend takes priority over that of an ordinary share. The fact that a company does not pay dividends to its ordinary shareholders does not automatically mean that dividends will not be paid to those holding preferred shares. This dividend generally corresponds to a fixed percentage of the nominal value or a priority refund of dividends, or both. Such shares therefore benefit from the characteristics and benefits of debt securities, while being classified for accounting purposes as shareholders' equity. On the other hand, these shares have the same risks as debt securities.

- Holding shares or units of other UCITS, AIFs or foreign investment funds:

  The Fund may invest up to 10% of its net assets in units or shares:
  - - of French or European UCITS,
  - of AIFs under French or European Law.

  The UCIs used may be UCITS or AIFs of all classifications.

  The UCIs may be those managed directly or indirectly by Axiom Alternative Investments or 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.

- For each of the above-mentioned classes:
  - Holding ranges:
    - Debt securities and money market instruments: up to 110% of the net assets.
    - Government bonds, fixed or variable-rate bonds: up to 110% of the net assets.
    - Shares: up to 50% of net assets.
    - Shares or units in other UCITS or AIFs: up to 10% of net assets.

<u>Derivative instruments:</u>

The use of derivatives products is authorised subject to a maximum commitment of 100% of the UCITS fund's net assets and therefore has an impact both on the performance and investment risk of the portfolio.

These instruments will allow:

- the Fund's overall exposure to interest rate risk to be increased or reduced,

- the portfolio to be hedged against exchange rate risk.

In this respect, they increase management flexibility. Derivatives are therefore used to maximise performance.

The manager may invest in forward financial instruments, options, swaps and CFD (Contracts for Difference), traded on regulated or over-the-counter markets in the eurozone and/or internationally. In this context, the manager may take positions with a view to hedging, adjudicating, and/or exposing the portfolio to sectors of activity, geographical areas, interest rates, shares (all types of capitalisation), foreign exchange, and indexes in order to achieve the management objective.

- Types of derivative instruments used
  The manager may trade in the derivative instruments described in the table below:

| Risks in which the manager intends to trade | | Types of markets targeted | | | Types of trades | | | |
|---|---|---|---|---|---|---|---|---|
| Equity | X | Regulated | Organised | Over the counter | Hedging | Exposure | Arbitrage | Other |
| Interest rate | X | | | | | | | |
| Foreign exchange | X | | | | | | | |
| Credit | X | | | | | | | |
| **Types of instruments used** | | | | | | | | |
| **Futures** | | | | | | | | |
| - Equities | | | | | | | | |
| - Interest rates | | X | X | | X | X | | |
| - Foreign currencies | | X | X | | X | | | |
| **Options** | | | | | | | | |
| - Equities | | | | | | | | |
| - Interest rates | | X | X | X | X | X | | |
| - Foreign exchange | | X | X | X | X | | | |
| **Swaps** | | | | | | | | |
| - Equities | | | | | | | | |
| - Interest rates | | | | X | X | X | | |
| - Inflation | | | | | | | | |
| - Foreign exchange | | | | X | X | | | |
| - Total return swaps | | | | | | | | |
| **Forward currency contracts** | | | | | | | | |
| - Forward currency contracts | | | | X | X | X | | |
| **Credit derivatives** | | | | | | | | |
| - Single-entity credit default swaps and basket default swap(s) | | | | X | X | X | | |
| - Credit-linked notes (CLN) | | | | X | X | X | | |
| - Indices | | | | | | | | |
| - Index options | | | | | | | | |
| - Structuring for basket credit derivatives (CDO tranches, iTraxx tranches, FTD, NTD, etc.) | | | | | | | | |
| **Other** | | | | | | | | |
| - Equity | | | | | | | | |
| **Warrants** | | | | | | | | |
| - Equities | | | | | | | | |
| - Interest rates | | | | | | | | |
| - Foreign exchange | | | | | | | | |
| - Credit | | | | | | | | |
| **EMTN** | | | | | | | | |
| - EMTN (structured) | | | | X | X | X | | |
| **Convertible bonds** | | | | | | | | |
| Exchangeable bonds | | | | X | X | X | | |
| Convertible bonds | | | | X | X | X | | |
| **Callable interest rate products** | | | | X | X | X | | |
| **Puttable interest rate products** | | | | X | X | X | | |
| **Subscription warrants** | | | | | | | | |
| - Equities | | | | X | X | X | | |
| - Interest rates | | | | X | X | X | | |

- Counterparty selection criteria

  Derivative instruments may be concluded with counterparties selected by Axiom Alternative Investments in line with its “Best Execution/Best Selection” policy and the procedure for approving new counterparties. The latter are major French and international counterparties, such as credit institutions or banks and are subject to exchanges of collateral. It is specified that these counterparties do not have any discretionary decision-making power over the composition or portfolio management of the Fund and/or over the underlying derivative financial instruments.

Deposits:

Up to a maximum of 20% of the Fund’s net assets may be in the form of deposits at a credit institution based in a Member State of the European Union or European Economic Area, with a term of less than 12 months, as a store of cash to be used as needed.

Cash borrowings:

In the event of high value redemptions, the manager may, on an exceptional and temporary basis, borrow cash up to the value of 10% of the Fund’s net assets.

Temporary purchases and sales of securities:

- Type of transactions:
  - Repurchase or reverse repurchase agreements in compliance with the French Monetary and Financial Code
  - Loans of securities in compliance with the French Monetary and Financial Code.

- Types of trades:

  Their main aim will be to enable:
  - Treasury management;
  - Optimisation of the Fund’s income;
  - The potential contribution to the leverage effect of the UCITS fund;

  These transactions must be limited to achieving the management objective.

- Types of assets that may be subject to such transactions:
  - Negotiable debt securities
  - Bonds
  - Shares.

- Level of use anticipated and authorised:
  - Repurchase and reverse repurchase agreements:
    - Maximum use: 100% of net assets
    - Expected use: approximately 10% of net assets.
  - Securities lending:
    - Maximum use: 100% of net assets
    - Expected use: approximately 10% of net assets.

For further information on the conditions of remuneration from temporary sales and purchases of securities, please refer to the “Charges and fees” section.

**Information on the use of temporary sales and purchases of securities**

Temporary sales or purchases of securities may only be used systematically with a view to achieving the Fund's management objective.

Temporary purchases (repurchase agreements) may only be used to ensure that the UCITS fund's cash and equivalents are invested at the best interest rates, using the securities as collateral.

Temporary sales (repurchases (1) and securities lending (2)) may only be used to (1) obtain cash equivalents at lower cost, pledging the securities as collateral or (2) enhance the UCITS fund's returns via the remuneration from securities lending.

However, with reference to the securities lending operations (2) without any financial guarantee and in compliance with the counterparty ratio of 10%, the remuneration from such transactions must accrue exclusively to the Fund and must be derived mainly from negotiable debt securities that are eligible for ECB bank refinancing and for which the securities lending market is virtually non-existent. Furthermore, such transactions must have maximum maturities of three months and the UCITS fund must be able to call them in at any time.

As the Fund uses derivatives and may borrow cash, as well as use transactions involving temporary purchases and sales of securities, the portfolio's total level of exposure shall not exceed 200% of the net assets.

**Information relating to the Fund's collateral**

The UCITS may receive securities or cash as collateral in the context of temporary purchases and sales of securities and derivatives transactions traded over the counter.

Cash collateral is reinvested in accordance with the applicable rules.

All of these assets must be issued by high-quality, liquid, diversified issuers with low volatility that are not an entity of the counterparty or its group.

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 loss risk:

Investors will be exposed to the risk of not recovering the full amount of the capital they invest, since the Fund does not offer a capital guarantee.

Interest rate risk:

Investors are exposed to interest rate risk. Interest rate risk is the risk that bond market interest rates may rise, which would cause bond prices to fall and consequently the Fund's net asset value to fall.

Credit risk:

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 Fund is invested will fall, causing the Fund's net asset value to fall.

As the UCITS fund may invest in high-yield speculative securities, which are securities with a low rating, the risk of a fall in the UCITS fund's net asset value may be higher. Investment in such speculative securities may increase the UCITS fund's overall exposure to credit risk.

Credit risk also exists in connection with temporary purchases and sales of securities if, at the same time, the counterparty for these transactions defaults and the issuer of the collateral received declares a default on the debt securities received as collateral.

Risk linked to the use of (high-yield) speculative securities:

This UCITS is to be considered as partially speculative and is aimed particularly at investors aware of the inherent risks of investing in securities with a low rating or no rating at all. As such, the use of high-yield securities means that the net asset value may drop more significantly.

Risks specific to convertible bonds:

Due to the hybrid nature of convertible bonds, the portfolio may be exposed to interest rate risk, credit risk, equity risk, volatility risk or exchange rate risk.

The value of convertible bonds is dependent on several factors: the level of interest rates, credit spreads, changes in the prices of the underlying equities and changes in the prices of the derivatives embedded in the convertible bonds. These various factors may entail a fall in the Fund's net asset value.

Risks associated with the commitment to forward financial instruments:

Equally, the use of derivatives may increase or decrease the volatility of the Fund by increasing or decreasing its exposure, respectively. In the event of adverse market developments, the net asset value may fall.

Risks associated with investing in Additional Tier 1 or contingent convertible bonds (CoCo bonds):

- Trigger level risk:

  A CoCo bond is a hybrid bond for which the trigger level depends on the solvency ratio of its issuer. The trigger level of a CoCo bond is the event that determines the bond's conversion into ordinary shares. The lower the solvency ratio, the greater the likelihood of conversion, all other things being equal. In addition to the risk of default on senior or subordinated debt, the resolution authority may impose a percentage of loss, firstly affecting shareholders and then the holders of CoCo bonds (without necessarily reaching the solvency ratio conversion threshold).

- Call extension risk:

  Certain CoCo bonds are debt securities considered permanent. The maturity date initially proposed may be exceeded. Hence a CoCo bond investor risks recovering their capital at a later date than initially expected.

- Coupon cancellation risk:

  CoCo bonds give entitlement to the payment of a coupon at a specified frequency. Issuers of certain types of CoCo bonds may cancel coupon payments: the non-payment of a coupon is definitive, at the discretion of the issuer or per bond (such cases are related to the rules restricting coupon payments according to the level of capital). This suspension of coupon payments may arise even when the bank pays dividends to its shareholders and variable remuneration to its employees. The amount of interest attached to this type of CoCo bond is therefore variable. The risk therefore applies to the frequency and the amount of remuneration of this type of bond.

- Capital structure inversion risk:

  Contrary to the conventional capital hierarchy, investors in CoCo bonds may, in certain circumstances, incur a capital loss before the shareholders. This may be the case, in particular, when the trigger level is high.

- Yield/valuation risk:

  The often attractive yield of CoCo bonds may be considered a complexity premium. Investors must take into account the underlying risks of CoCo bonds.

- Unknown risk:

  CoCo bonds are recent instruments whose behaviour during times of stress is unknown.

Up to 20% of the net assets may be invested in convertible contingency bonds ("CoCos"). CoCos are subordinate debt instruments that are complex, regulated and heterogeneous in their structuring.

- Risk associated with perpetual coupon bonds

Use of perpetual coupon bonds exposes the Fund to the following risks:

- cancellation of the coupon: Payments of coupons in this type of instruments are entirely discretionary and may be cancelled by the issuing authority at any time, for whatever reason and free of the usual time constraints.
- capital structure: unlike the conventional hierarchy of capital, investors in these instruments may suffer a capital loss. Indeed, the subordinated creditor will be refunded after ordinary creditors, but before shareholders
- call for extension: These instruments are issued as perpetual, callable instruments at predetermined levels

The occurrence of any of these risks may reduce the Fund's net asset value.

<u>Counterparty risk</u>:

Counterparty risk exists and is associated with the conclusion of over-the-counter financial futures contracts or the temporary purchase and sale of securities. 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. This refers, therefore, to the default risk of a counterparty 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.

<u>Liquidity risk</u>:

Liquidity risk may materialise where specific and exceptional market conditions make finding market counterparties or reasonable prices difficult. If markets fail or shut, force majeure may be invoked to justify liquidity restrictions.

In the event that a counterparty defaults on a securities financing transaction, this risk will apply to collateral by way of the sale of securities received.

<u>Risks associated with securities financing transactions and the management of collateral:</u>

The use of temporary purchases and sales of securities may increase or reduce the Fund's net asset value.

The risks associated with these transactions and with the management of collateral are credit risk, counterparty risk and liquidity risk as defined above.

Furthermore, the operational or legal risks are very limited due to an appropriate operating process, the custody of collateral received by the custodian of the Fund and the supervision of this type of operation through framework agreements concluded with each counterparty.

Finally, the risk of collateral reuse is very limited since only cash collateral is reused in accordance with the regulations relating to UCITS.

<u>Risk associated with the portfolio's sectoral focus:</u>

This risk is associated with the concentration of investments in financial instruments sensitive to the financial corporations sector. This risk may result in a decline in the Fund's net asset value and a capital loss for the holder.

Discretionary management risk:

Discretionary management style relies on anticipating trends in the various markets (equities, bonds, etc.). There is a risk that the UCITS may not be invested in the best-performing markets at all times.

Risk associated with market shares:

The Fund may be invested in preferred shares. These preferred shares do not include any option for exchanging shares. Banks have created these preferred shares so that regulators will accept them in their own funds as an ordinary share. A UCI holder is a shareholder and not a creditor. However, the value of the preferred share will not be linked to the valuation of the share and the holder of a preferred share will not attend the shareholders' meetings, etc. Furthermore, these preferred shares have bond characteristics (fixed coupon but subject to certain conditions, a nominal value, rating, duration, and redemption at nominal value). However, in the event of the bank's bankruptcy, the preferred shares will be used to meet the bank's liabilities but in the same way as conventional subordinate bonds.

Axiom Alternative Investments concludes from this that these preferred shares, by their very nature, present a low equity risk. Equity sensitivity is non-zero only when the risk of bankruptcy is approaching.

Exchange rate risk:

The Fund may be exposed to issuers, the securities of which are denominated in currencies other the Fund's reference currency (the euro).

The exchange rate risk remains an ancillary one (limited to 10% of net assets) to the extent that the manager goes ahead with hedging by using forward financial instruments.

- For the U unit denominated in GBP, the JS unit denominated in CHF and the JU unit denominated in USD:

  These units are denominated in a currency other than the euro; the exchange rate risk related to fluctuations in the euro against the valuation currency is residual, because of systematic hedging. This hedging may lead to a performance gap between the units denominated in different currencies.

  U, JS and JU units will be systematically hedged against exchange rate risk.

All units have the same investment portfolio, and U, JS and JU units are also hedged against the exchange rate risk between their valuation currency and the euro.

**Management policy for liquidity risk**

The management of the portfolio's overall liquidity and the liquidity of each underlying security is incorporated into the Axiom Alternative Investment management process.

The purpose is to maintain a portfolio, the majority of which can be liquidated in a few days under normal market conditions.

Liquidity is of one of the main criteria when analysing a security. Axiom Alternative Investments values securities based on the size of the issuance and the number of operators providing prices. Axiom Alternative Investments does not invest in a security that does not appear to meet its liquidity criteria.

In order to be able to deal with the challenging market conditions and large redemptions, Axiom Alternative Investments monitors the Fund's liquidity profile, which includes a stress test that takes into account those challenging market conditions.

**Guarantee or protection**

None.

**Eligible subscribers and typical investor profile**

| | |
|---|---|
| G units | Reserved for Groupama SA companies, subsidiaries and regional mutuals |
| I units | Reserved for institutional investors for whom the Groupama Group and its external distributors are the marketing agents |
| J units | Reserved for institutional investors for whom Axiom Alternative Investments is the marketing agent |
| JD units | Reserved for institutional investors for whom Axiom Alternative Investments is the marketing agent |
| JS units | Reserved for institutional investors for whom Axiom Alternative Investments is the marketing agent |
| JU units | Reserved for institutional investors for whom Axiom Alternative Investments is the marketing agent |
| L units | Reserved for subscribers for whom Axiom Alternative Investments is the marketing agent |
| N units | Open to all subscribers |
| O units | Reserved for UCIs and mandates managed by Groupama Asset Management or its subsidiaries that are part of the Opale range and the UCIs or mandates managed by Axiom Alternative Investments |
| P units | Reserved for institutional investors |
| R units | Reserved for investors subscribing via distributors or intermediaries connected to Groupama Asset Management providing advisory services as defined by the MiFID II European regulations, or individual portfolio management services under mandate when they are exclusively remunerated by their clients |
| T units | Reserved for investors subscribing via distributors or intermediaries connected to Axiom Alternative Investments providing advisory services as defined by the MiFID II European regulations, or individual portfolio management services under mandate when they are exclusively remunerated by their clients |
| U units | Reserved for institutional investors for whom Axiom Alternative Investments is the marketing agent |

The FCP GROUPAMA AXIOM LEGACY 21 is intended for investors who wish to invest in the financial sector through exposure to the international bond market by investing particularly in securities impacted by the end of the Basel 2 to Basel 3 transition period (also referred to as the “Grandfathering Period”) that applies to banks (up to December 2021), as well as in securities issued by insurance companies, and who are able to take on the risks associated with this investment.

The recommended minimum investment term in the Fund is more than four years.

The amount that may reasonably be invested in the UCITS fund depends on the investor’s personal situation. In determining this, investors should take account of their personal assets and financial plans, and their willingness to take risks or alternatively to favour a more cautious investment. It is also highly recommended that investors diversify their investments sufficiently so as not to be exposed solely to the risks of this Fund.

**Procedures for determining and allocating distributable sums**

| | |
|---|---|
| G units | Accumulation and/or distribution.<br>Interim dividend payments are authorised. Option to carry forward earnings in full or in part. |
| I units | Accumulation |
| J units | Accumulation |
| JD units | Distribution |
| JS units | Accumulation |
| JU units | Accumulation |
| L units | Accumulation |
| N units | Accumulation |
| O units | Distribution |
| P units | Accumulation |
| R units | Accumulation |
| T units | Accumulation |
| U units | Accumulation |

**Characteristics of units**

| | Initial net asset value | Base currency | Fractioning |
|---|---|---|---|
| G units | €1,000 | Euro | Thousandths of a unit |
| I units | €1,000 | Euro | Thousandths of a unit |
| J units | €1,000 | Euro | Thousandths of a unit |
| JD units | €1,000 | Euro | Thousandths of a unit |
| JS units | CHF 1,000 | Swiss francs | Thousandths of a unit |
| JU units | $1,000 | US dollars | Thousandths of a unit |
| L units | €1,000 | Euro | Thousandths of a unit |
| N units | €1,000 | Euro | Thousandths of a unit |
| O units | €1,000 | Euro | Thousandths of a unit |
| P units | €1,000 | Euro | Thousandths of a unit |
| R units | €1,000 | Euro | Thousandths of a unit |
| T units | €1,000 | Euro | Thousandths of a unit |
| U units | GBP 1,000 | British pound | Thousandths of a unit |

**Subscription and redemption procedures**

| | Minimum initial subscription amount | Subscriptions | Redemptions* |
|---|---|---|---|
| G units | €300,000 | In amounts or in thousandths of a unit | In amounts or in thousandths of a unit |
| I units | €100,000 | In amounts or in thousandths of a unit | In amounts or in thousandths of a unit |
| J units | €100,000 | In amounts or in thousandths of a unit | In amounts or in thousandths of a unit |
| JD units | €100,000 | In amounts or in thousandths of a unit | In amounts or in thousandths of a unit |
| JS units | CHF 100,000 | In amounts or in thousandths of a unit | In amounts or in thousandths of a unit |
| JU units | $100,000 | In amounts or in thousandths of a unit | In amounts or in thousandths of a unit |
| L units | 1 unit | In amounts or in thousandths of a unit | In amounts or in thousandths of a unit |
| N units | 1 unit | In amounts or in thousandths of a unit | In amounts or in thousandths of a unit |
| O units | 1 unit | In amounts or in thousandths of a unit | In amounts or in thousandths of a unit |
| P units | €10,000,000 | In amounts or in thousandths of a unit | In amounts or in thousandths of a unit |
| R units | 1 unit | In amounts or in thousandths of a unit | In amounts or in thousandths of a unit |
| T units | 1 unit | In amounts or in thousandths of a unit | In amounts or in thousandths of a unit |
| U units | GBP 100,000 | In amounts or in thousandths of a unit | In amounts or in thousandths of a unit |

*The total redemption of units will only be possible as a quantity and not an amount.

Subscriptions and redemptions are cleared by CACEIS Bank and received every banking day until 11 am at CACEIS Bank and Orange Bank for those clients for whom it provides custody-account keeping services.

They are executed on an unknown net asset value basis with settlement on D+3 Euronext Paris.

Investors are reminded that when sending instructions to marketing agents other than the institutions indicated above, they must take account of the fact that the cut-off time for clearing orders imposed by CACEIS BANK applies to these marketing agents. Consequently, these 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 every trading day, except on official French public holidays. The reference calendar is that of the Paris Stock Exchange.

<u>The net asset value may be obtained from</u>: The website www.axiom-ai.com or during opening hours at the premises of Axiom Alternative Investments on +33 (0)1 44 69 43 90 or from the website www.groupama-ama.com or at the premises of Groupama Asset Management.

**Charges and fees**

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 Fund are used to compensate the latter for the expenses incurred in the investment or divestment of the Fund's assets. The remaining fees accrue to the management company, marketing agent, etc.

| Unit class | Base | Subscription fee not accruing to the Fund | Subscription fee accruing to the Fund | Redemption fee not accruing to the Fund | Redemption fee accruing to the Fund |
|---|---|---|---|---|---|
| G units | Net asset value x Number of units or shares | Maximum rate: 5% incl. tax | None | None | Maximum rate: 1% incl. tax up to 31/03/2018 None after that date |
| I units | Net asset value x Number of units or shares | Maximum rate: 5% incl. tax | None | None | Maximum rate: 1% incl. tax up to 31/03/2018 None after that date |
| J units | Net asset value x Number of units or shares | Maximum rate: 5% incl. tax | None | None | Maximum rate: 1% incl. tax up to 31/03/2018 None after that date |
| JD units | Net asset value x Number of units or shares | Maximum rate: 5% incl. tax | None | None | Maximum rate: 1% incl. tax up to 31/03/2018 None after that date |
| JS units | Net asset value x Number of units or shares | Maximum rate: 5% incl. tax | None | None | Maximum rate: 1% incl. tax up to 31/03/2018 None after that date |
| JU units | Net asset value x Number of units or shares | Maximum rate: 5% incl. tax | None | None | Maximum rate: 1% incl. tax up to 31/03/2018 None after that date |
| L units | Net asset value x Number of units or shares | Maximum rate: 5% incl. tax | None | None | Maximum rate: 1% incl. tax up to 31/03/2018 None after that date |
| N units | Net asset value x Number of units or shares | Maximum rate: 5% incl. tax | None | None | Maximum rate: 1% incl. tax up to 31/03/2018 None after that date |
| O units | Net asset value x Number of units or shares | Maximum rate: 5% incl. tax | None | None | Maximum rate: 1% incl. tax up to 31/03/2018 None after that date |
| P units | Net asset value x Number of units or shares | Maximum rate: 5% incl. tax | None | None | Maximum rate: 1% incl. tax up to 31/03/2018 None after that date |
| R units | Net asset value x Number of units or shares | Maximum rate: 5% incl. tax | None | None | Maximum rate: 1% incl. tax up to 31/03/2018 None after that date |

| Unit class | Base | Subscription fee not accruing to the Fund | Subscription fee accruing to the Fund | Redemption fee not accruing to the Fund | Redemption fee accruing to the Fund |
|---|---|---|---|---|---|
| T units | Net asset value x<br>Number of units or shares | Maximum rate:<br>5% incl. tax | None | None | Maximum rate:<br>1% incl. tax up to 31/03/2018<br>None after that date |
| U units | Net asset value x<br>Number of units or shares | Maximum rate:<br>5% incl. tax | None | None | Maximum rate:<br>1% incl. tax up to 31/03/2018<br>None after that date |

<u>Operating and management fees</u>:

These fees include all those fees charged directly to the Fund, except for transaction charges. Transaction charges include intermediary fees (e.g. brokerage fees, stock market taxes, etc.) and the transaction fee, if any, that may be charged, particularly by the custodian and the management company.

The following fees may be charged in addition to operating and management fees:

- Outperformance fees. These remunerate Axiom Alternative Investments if the Fund exceeds its targets. They are therefore charged to the Fund;
- Transaction fees charged to the Fund.

For ongoing charges invoiced to the Fund, please refer to the “Charges” Section of the Key Investor Information Document (KIID)

| Unit class | Management fees, indirect costs and outperformance fees | | | | Transaction fees | | |
|---|---|---|---|---|---|---|---|
| | Base | Management fees including external management fees (statutory auditor, custodian, distribution, lawyers, etc.) | Maximum indirect fees (management fees and charges) | Outperformance fee | Base | Fee accruing to the custodian | Fee accruing to the Management Company |
| G units | Net assets | Maximum rate:<br>0.70% incl. tax | Not significant (1) | 10% of the outperformance compared with the 3-month EURIBOR index +3% (2) | Deducted from each transaction | €0 to €63.38 incl. tax | None |
| I units | Net assets | Maximum rate:<br>1% incl. tax | Not significant (1) | 10% of the outperformance compared with the 3-month EURIBOR index +3% (2) | Deducted from each transaction | €0 to €63.38 incl. tax | None |
| J units | Net assets | Maximum rate:<br>1% incl. tax | Not significant (1) | 10% of the outperformance compared with the 3-month EURIBOR index +3% (2) | Deducted from each transaction | €0 to €63.38 incl. tax | None |
| JD units | Net assets | Maximum rate:<br>1% incl. tax | Not significant (1) | 10% of the outperformance compared with the 3-month EURIBOR index +3% (2) | Deducted from each transaction | €0 to €63.38 incl. tax | None |
| JS units | Net assets | Maximum rate: | Not significant (1) | 10% of the outperformance | Deducted from each transaction | €0 to €63.38 incl. tax | None |

| Unit class | Management fees, indirect costs and outperformance fees | | | | Transaction fees | | |
|---|---|---|---|---|---|---|---|
| | **Base** | **Management fees including external management fees (statutory auditor, custodian, distribution, lawyers, etc.)** | **Maximum indirect fees (management fees and charges)** | **Outperformance fee** | **Base** | **Fee accruing to the custodian** | **Fee accruing to the Management Company** |
| | | 1% incl. tax | | compared with the 3-month EURIBOR index +3% (2) | | | |
| JU units | Net assets | Maximum rate: 1% incl. tax | Not significant (1) | 10% of the outperformance compared with the 3-month EURIBOR index +3% (2) | Deducted from each transaction | €0 to €63.38 incl. tax | None |
| L units | Net assets | Maximum rate: 1.50% incl. tax | Not significant (1) | 10% of the outperformance compared with the 3-month EURIBOR index +3% (2) | Deducted from each transaction | €0 to €63.38 incl. tax | None |
| N units | Net assets | Maximum rate: 1.50% incl. tax | Not significant (1) | 10% of the outperformance compared with the 3-month EURIBOR index +3% (2) | Deducted from each transaction | €0 to €63.38 incl. tax | None |
| O units | Net assets | Maximum rate: 0.10% incl. tax | Not significant (1) | 10% of the outperformance compared with the 3-month EURIBOR index +3% (2) | Deducted from each transaction | €0 to €63.38 incl. tax | None |
| P units | Net assets | Maximum rate: 0.70% incl. tax | Not significant (1) | 10% of the outperformance compared with the 3-month EURIBOR index +3% (2) | Deducted from each transaction | €0 to €63.38 incl. tax | None |
| R units | Net assets | Maximum rate: 1.05% incl. tax | Not significant (1) | 10% of the outperformance compared with the 3-month EURIBOR index +3% (2) | Deducted from each transaction | €0 to €63.38 incl. tax | None |
| T units | Net assets | Maximum rate: 1.05% incl. tax | Not significant (1) | 10% of the outperformance compared with the 3-month EURIBOR index +3% (2) | Deducted from each transaction | €0 to €63.38 incl. tax | None |
| U units | Net assets | Maximum rate: 1% incl. tax | Not significant (1) | 10% of the outperformance compared with the 3-month EURIBOR index +3% (2) | Deducted from each transaction | €0 to €63.38 incl. tax | None |

(1) The UCIs held in the portfolio account for less than 20%.

(2) Method for calculating the outperformance fee:

NAV: Net asset value

Performance period: The financial year except for the first period, which will be from the date the Fund was launched until 31/12/2018.

High water mark: The highest between the initial NAV and the NAV at the end of each performance period.

NAV index: the final NAV of the previous performance period plus the 3-month EURIBOR performance + 3%.

Provided that the performance of the Fund has been positive since the beginning of the period of performance concerned, a daily fee of 10% of the positive difference between the NAV's variation (depending on the number of units in circulation on the calculation date) and the maximum established between the high water mark and the NAV index.

In the event of underperformance in relation to this index, a daily amount corresponding to 10% of this underperformance is deducted from the fee created since the beginning of the financial year.

In the event of redemption, the part of the fee for performance costs corresponding to shares redeemed is transferred to the management company in accordance with the principle of crystallisation.

The entire performance fee is paid to the management company at the end of the financial year.

These fees are charged directly to the Fund's profit & loss account.

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

Income from transactions involving the temporary purchase and sale of securities accrues to the Fund. Charges, costs and fees in respect of these transactions are charged by the custodian and paid by the Fund.

Description of the process for selecting intermediaries:

Axiom Alternative Investments has adopted a multi-criteria approach to selecting intermediaries, thus ensuring that its stock market orders are better implemented.

The criteria used shall be both quantitative and qualitative and depend on the markets on which intermediaries offer their services, both in terms of geographical areas and instruments.

The analysis criteria mainly include the availability and pro-activity of contacts, the financial strength, speed, and quality of the way in which orders are handled and fulfilled as well as brokerage costs.

## 4 COMMERCIAL INFORMATION

Any information relating to the Fund can be obtained by writing directly to:

Groupama Asset Management

25, rue de la Ville l'Evêque – 75008 Paris – France

And

Axiom Alternative Investments

39, Avenue Pierre 1er de Serbie - 75008 Paris – France

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

Axiom Alternative Investments

39, Avenue Pierre 1er de Serbie - 75008 Paris – France

Subscription and redemption requests are cleared at CACEIS Bank:

CACEIS Bank

1-3 place Valhubert - 75206 Paris cedex 1 – France

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

Information relating to environmental, social and governance criteria (ESG) will be made available on the website www.axiom-ai.com and will appear in the annual report. The selection does not systematically and simultaneously include environmental, social and governance criteria (ESG criteria).

## 5 INVESTMENT RULES

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

## 6 OVERALL RISK

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

## 7 ASSET VALUATION AND ACCOUNTING RULES

The net asset value per unit is calculated taking into account the valuation rules specified below, the application procedures being set out in detail in the notes to the annual financial statements.

- Shares traded on a regulated French or foreign market operating regularly are valued on the basis of the last official stock market prices. The market price used depends on the market where the security is listed:
  - European listing markets: last market price on the NAV calculation date
  - Asian listing markets: last market price on the NAV calculation date
  - North and South American listing markets: last market price on the NAV calculation date.

  The prices used are those known at 9 am (CET) on the following day and as provided by: Fininfo or Bloomberg. In the event that a net asset is not listed, the last known market price is used.

- Transferable securities other than shares traded on a French or foreign regulated market operating regularly are valued on the basis of the last mid-price of the day. The valuation at the reference market price is conducted according to the procedures adopted by Axiom Alternative Investments and specified in the notes to the annual financial statements.

- Debt securities and equivalent securities that are not traded in large volumes are valued using an actuarial method, with the rate used being that of issues of equivalent securities plus or minus any differential representing the intrinsic characteristics of the issuer of the security. However, negotiable debt securities with a residual maturity of three months or less and without a particular sensitivity may be valued using a linear method. The methods of applying these rules shall be adopted by Axiom Alternative Investments and specified in the notes to the annual financial statements;

- For transferable securities, the price of which has not been listed on the valuation date and for other items on the balance sheet, Axiom Alternative Investments corrects their valuation to reflect variations that current events would probably generate. The statutory auditor is notified of this decision;

- Shares and units of the Fund are valued either on the basis of the last known net asset value, or at the last known price listed on the valuation date for the Fund that is quoted.

- Transactions on the futures markets are valued during clearing and conditional operations according to the title of the medium. The market value for futures contracts is equal to the price in euro multiplied by the number of contracts. The market value for conditional transactions is equal to the translation into an underlying equivalent.

The Fund has complied with the accounting rules set forth in the current regulations and, in particular, with the Fund's chart of accounts.

Management fees are charged to the Fund's profit and loss account when calculating each net asset value.

The Fund has opted for the Euro as its base accounting currency.

Interest is recorded using the accrued interest method.

All transactions are recorded exclusive of costs.

## 8 REMUNERATION

The remuneration policy implemented by Axiom Alternative Investments complies with the provisions of Directive 2014/91/EU of 23 July 2014, referred to as the "UCITS 5 Directive", with Article L 533-22-2 of the French monetary and financial code (AMF) as amended by decree no. 2016-312 of 17 March 2016 and AMF's general regulations, in particular Article 314-85-2 of the latter.

The remuneration policy applies to all employees responsible for control functions, portfolio managers, members of the company's Management Board and to all the company's risk-takers and to all employees who, in light of their overall remuneration, are in the same income bracket as directors and risk-takers, whose professional activities have a substantial impact on their risk profile or on the risk profile of the Fund they manage (the staff identified).

The remuneration of the staff identified includes a variable section, the payment methods and potential retention methods of which aim to:

- prevent any incitement to take risks that are incompatible with the risk profiles and instruments of incorporation of managed Funds;
- protect investors by preventing any conflicts of interest between one or more persons who are among the staff identified and the managed UCITS funds;

Ensure an appropriate balance between the fixed and variable components of the overall remuneration attributed to a particular staff member.

The remuneration policy established by Axiom Alternative Investments is updated annually to take into account in particular changes in regulations.

In line with the principle of proportionality, the governance of Axiom Alternative Investments in matters of pay is provided directly by its management board, which adopts the principles of the remuneration policy that apply.

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