Website Disclosure

**BNPP AM Group - Class Actions Policy**

**SEPTEMBER 2025**

This document describes the Policy of the BNPP AM Group's management companies[1] regarding their participations in class actions (the "**Class Actions Policy**").

A class action can typically be described as a collective legal procedure, seeking compensation for multiple persons having been harmed by the same (illegal) activity. Whilst class actions are well known in the USA, other jurisdictions are also increasingly providing for similar procedures.

Participating in a class action, even as harmed person, may – under certain circumstances – entail significant legal, financial and/or reputational risks. From a risk management perspective, a distinction can often be made between an "Active Role" (i.e. class actions where investors initiate, acts as plaintiffs or otherwise take an active role in the course of the collective legal proceedings against the issuer) and a "Passive Role" (i.e. class actions where investors do not take any such active role but only apply for (a share of the) compensation awarded, after the conclusion of the legal proceedings).

As a matter of policy,

- BNPP AM will, in principle, not participate via an Active Role in a class action (i.e. BNPP AM will not initiate, act as a plaintiff or otherwise take an active role in a class action against an issuer);
- BNPP AM may participate via a Passive Role in a class action in jurisdictions where BNPP AM considers, at its sole discretion, that (i) the class action process is sufficiently effective (e.g. where the anticipated revenue exceeds the anticipated cost of the process), (ii) the class action process is sufficiently predictable and (iii) the relevant data required for the assessment of eligibility to the class action process are reasonably available and can be efficiently and robustly managed[2];
- all proceeds in the context of a class action, are paid in full to the fund, the external costs will be invoiced separately to the funds involved in the relevant class action.

BNPP AM may at any time amend its Class Actions Policy and may deviate from the principles set out therein in specific circumstances.

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[1] BNPP AM Europe, BNPP AM Luxembourg, BNPP AM Europe, Belgian Branch, BNPP AM Europe, Netherlands Branch, BNPP AM Monaco, Alfred Berg Kapitalforvaltning, BNPP AM USA, BNPP AM Brazil, BNPP AM Japan, BNPP AM Indonesia, BNPP AM Asia.