This document provides you with key investor information about this fund. It is not marketing material. The information is required by law to help you understand the nature and the risks of investing in this fund. You are advised to read it so you can make an informed decision about whether to invest.

FIXED INCOME

Columbus EM Debt Strategy

Share class: Capitalisation and/or Distribution EUR (ISIN: FR0013204161)

This Fund is managed by AXA IM Paris, part of the AXA IM Group

Objective and Investment Policy

AMF categorisation: International bonds and other debts securities

Investment Objective

The aim of the Fund is to seek performance through exposure to the global emerging market debt.

Investment Policy

The Fund is actively managed in order to capture opportunities in the emerging debt universe worldwide. The Fund allocation strategy is based upon macroeconomic forecasts (i.e. analyzing the economic facts from a global point of view) and issuers' analysis in order to determine the active policy of the Fund. In selecting securities, the Manager considers among other things:

- the price of the securities, and the issuer's financial history, condition, management and prospects
- geographical allocation
- duration positioning (duration measures, in number of years, the portfolio's modified duration to interest rate variations)
- issuer selection (creditworthiness)
- and the external and internal rating criteria

The Fund may invest on a global basis in multiple asset classes in Investment Grade securities such as "Sovereigns","Quasi-Sovereigns" and "Corporate bonds" which are denominated in hard currencies in Euro, GBP and US Dollars and which may be classified as Investment Grade or deemed to be equivalent by the Manager (i. e. rated at least BBB- by one of the 3 rating agencies: Standard &Poor's, Moody's , Fitch). The rating of external agencies are considered in connection with the Fund's investment decisions, but are not necessarily a determinative or limiting factor. Indeed, the selection and allocation of credit instruments is not exclusively and mechanically based on their publicly available credit rating but also on an internal credit or market risk analysis.

The Fund has flexibility in relation to the range of instruments in which it may invest so as to enable the Manager, in pursuit of the investment objective, to react to and take advantage of market conditions at any particular time.

The Fund's modified duration to interest rates has generally ranged between 0 to 8: this means that if interest rates increase by 1%, the net asset value of the Fund may decrease up to 8%.

Within the limit of 100% of its net assets, the investment strategy will be implemented by using securities and financial derivatives instruments.

Fund Currency

The reference currency of the Fund is EUR.

Investment Horizon

This Fund may not be suitable for investors who plan to withdraw their contribution within 4.5 years.

Processing of subscription and redemption orders

The subscription and redemption orders must be received by the Registrar and Transfer Agent on any Valuation Day no later than 12 noon. Orders will be processed at the Net Asset Value calculated the following business day. The investors' attention is drawn to the existence of potential additional processing time due to the possible involvement of intermediaries such as Financial Advisers or distributors.

The Net Asset Value of this Fund is calculated on a daily basis.

Minimum initial investment: EUR 100,000

Risk and Reward Profile

Lower risk ← → **Higher risk**

Potentially lower reward — Potentially higher reward

1	2	**3**	4	5	6	7

The risk category is calculated using historical performance data and may not be a reliable indicator of the Fund's future risk profile.

The risk category shown is not guaranteed and may shift over time.

The lowest category does not mean risk free.

Why is this Fund in this category?

The capital of the Fund is not guaranteed. The Fund is invested in financial markets and uses techniques and instruments which are subject to some level of variation which may result in gains or losses.

Additional Risks

Counterparty Risk: Risk of bankruptcy, insolvency, or payment or delivery failure of any of the Fund's counterparties, leading to a payment or delivery default.

Credit Risk: Risk that issuers of debt securities held in the Fund may default on their obligations or have their credit rating downgraded, resulting in a decrease in the Net Asset Value.

Impact of any techniques such as derivatives: Certain management strategies involve specific risks, such as liquidity risk, credit risk, counterparty risk, legal risk, valuation risk, operational risk and risks related to the underlying assets.

The use of such strategies may also involve leverage, which may increase the effect of market movements on the Fund and may result in significant risk of losses.

Charges

The charges you pay are used to pay the cost of running the fund, including the costs of marketing and distributing it. These charges reduce the potential growth of your investment.

One-off charges taken before or after you invest	
Entry charge	none
Exit charge	none
This is the maximum that might be taken out of your money before it is invested.	
Charges taken from the fund over a year	
Ongoing charge	0.38%
Charges taken from the fund under certain specific conditions	
Performance fees	none

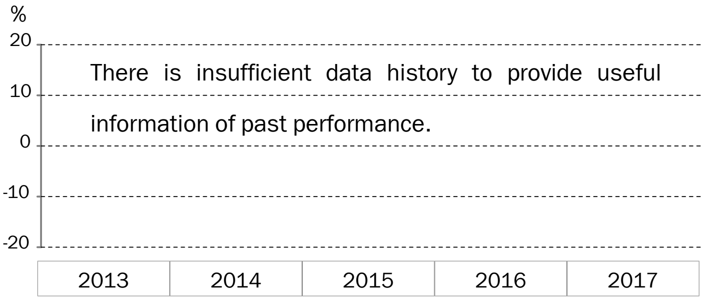
The entry and exit charges shown are maximum figures. In some cases, you might pay less - you can find this out from your Financial Adviser.

The ongoing charges figure is based on expenses for the twelve month period ending December 2016. This figure may vary from year to year. It excludes:

- Performance fees
- Portfolio transaction costs, except in the case of an entry/exit charge paid by the Fund when buying or selling units in another collective investment undertaking

For more information about charges, please refer to the Fund's prospectus, section charges, which is available at www.axa-im.com.

Past Performance



Past performance is not a reliable indicator of future results.

Past performance is shown after the deduction of ongoing charges. Any entry/exit fees are excluded from the calculation.

The Fund was launched on 22/03/2017.

Past performance has been calculated in EUR and is expressed as a percentage change of the Fund's Net Asset Value at each year end.

Practical Information

The Units cannot be subscribed, sold or offered directly or indirectly to retail investors within the meaning of Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments ("Retail Investor").

Depositary:
BNP-Paribas Securities
Services Grands Moulins de Pantin
9, rue du Débarcadère, 93500 Pantin

Further Information: more detailed information on this Fund, such as the prospectus as well as the latest annual and semi-annual report, can be obtained free of charge from the Fund Management Company or the central administrator.

Details of the up to date remuneration policy of the company are published online at https://www.axa-im.com/en/remuneration. This includes the description of how remuneration and benefits are awarded for employees, and information on the remuneration committee. The company provides a paper copy free of charge upon request.

Net Asset Value Publication: the Net Asset Value per share is available at www.axa-im.com, and at the registered office of the Management Company.

Tax Legislation: the Fund is subject to the tax laws and regulations of France. Depending on your own country of residence this might have an impact on your investments. For further details, you should consult a Tax Adviser.

Liability Statement: AXA IM Paris may be held liable solely on the basis of any statement contained in this document that is misleading, inaccurate or inconsistent with the relevant parts of the prospectus for the Fund.

U.S. Investors are not eligible to the Fund as referred to in the Prospectus.

COLUMBUS EM DEBT STRATEGY

UCITS as per the European Directive 2009/65/CE

PROSPECTUS

The *Autorité des Marchés Financiers* draws the attention of subscribers on the high level of direct and indirect costs to which this Fund is exposed. The return on investment requires continuous high performance of financial markets.

I – General characteristics:

I - 1 Form of the Fund:

➤ **Name:** COLUMBUS EM DEBT STRATEGY
➤ **Legal status and member-state in which the Fund was established:** *Fonds Commun de Placement* (FCP) governed by French law.
➤ **Launch Date and term:** This UCITS was authorised by the French Financial Markets Authority (A.M.F.) on 7 October 2016 and set-up on 22 March 2017 for a term of 99 years.

➤ **Summary of the management offer:**

ISIN code	*Allocation of the Distributable Amounts*	*Base currency*	*Target subscribers*	*Initial NAV*	*Minimum subscription amount (Except for the Management Company)*
FR0013204161	Accumulation and/or Distribution	Euro	All subscribers, this Fund is more specifically intended for AXA MEdLA companies (*)	€ 100	€ 100 000

(*) The Units cannot be subscribed, sold or offered directly or indirectly to retail investors within the meaning of Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments ("Retail Investor").

➤ **Indication of the place where the latest, annual report, interim statements, net asset value of the fund and if any, information on past performance can be obtained:**
The latest annual documents and composition of the assets may be sent within eight (8) business days , upon written request by any unitholder, to the following address:

AXA INVESTMENT MANAGERS PARIS
Tour Majunga - 6 place de la Pyramide
92908 PARIS – La Défense cedex

For additional information, in particular with respect to the last net asset value and past performances, please contact AXA Investment Managers Paris at the address indicated above or access the following Website: www.axa-im.fr

I - 2 Stakeholders:

➢ **Management company:** AXA INVESTMENT MANAGERS PARIS, Portfolio Management Company, Tour Majunga - La Défense 9 - 6, place de la Pyramide - 92800 Puteaux, approved by the *Autorité des Marchés Financiers* (« AMF ») under authorisation n° GP 92008 dated 7 April 1992.

➢ **Custody account keeper, depository and orders centralising custodian:**

Identity of the depositary of the UCITS:

The appointed depositary is BNP Paribas Securities Services SCA, a wholly-owned subsidiary of BNP Paribas SA, located at 9 rue du Débarcadère 93500 PANTIN (the “Depositary”). BNP Paribas Securities Services SCA is a licensed bank incorporated in France as a *Société en Commandite par Actions* (partnership limited by shares) under No.552 108 011, authorised by the *Autorité de Contrôle Prudentiel et de Résolution* (ACPR) and supervised by the *Autorité des Marchés Financiers* (AMF), with its registered address at 3 rue d’Antin, 75002 Paris.

Description of its duties and of conflicts of interest that may arise:

The Depositary exercises three types of responsibilities, namely the oversight of the Management Company (as defined in Art 22.3 of the UCITS V directive), the monitoring of the cash flows of the UCITS (as set out in Art 22.4) and the safekeeping of the UCITS assets (per Art 22.5).

The overriding objective of the Depositary is to protect the interests of the holders / investors of the UCITS, which always prevail over any commercial interests.

Conflicts of interest may arise if and when the Management Company or the UCITS maintains other business relationships with BNP Paribas Securities Services SCA in parallel with an appointment of BNP Paribas Securities Services SCA acting as Depositary. For example, BNP Paribas Securities Services SCA could as well as acting as Depositary also be providing the UCITS or the Management Company with fund administration services, including net asset value calculation.

In order to address situations of conflicts of interest, the Depositary has implemented and maintains a management of conflicts of interest policy, aiming at:

- Identifying and analysing potential situations of conflicts of interest;
- Recording, managing and monitoring the conflict of interest situations either in:
    - Relying on the permanent measures in place to address conflicts of interest such as maintaining separate legal entities, segregation of duties, separation of reporting lines, insider lists for staff members;
    - Implementing a case-by-case management to (i) take the appropriate preventive measures such as drawing up a new watch list, implementing a new Chinese wall, making sure that operations are carried out at arm’s length and/or informing the concerned client, or (ii) refuse to carry out the activity giving rise to the conflict of interest.

Description of any safekeeping functions delegated by the Depositary, the list of delegates and sub-delegates and any conflicts of interest that may arise from such a delegation:

The depositary of the UCITS, BNP Paribas Securities Services SCA, is responsible for safekeeping of the assets (as defined in Art 22.5 of 2009/65/CE Directive modified by 2014/91UE Directive named the "UCITS V directive").

In order to provide custody services in a large number of countries allowing UCITS to meet their investment objectives, in addition to its large proprietary network, BNP Paribas Securities Services SCA has appointed entities as delegates for sub-custody functions in countries where it has no direct local presence. These entities are listed in the following website: http://securities.bnpparibas.com/solutions/asset-fund-services/depositary-bank-and-trustee-serv.html

The process of appointing such delegates and their continuing oversight follows the highest quality standards, including the management of any potential conflict of interest that should arise from such an appointment.

➢ **Auditor:** PricewaterhouseCoopers Audit
63, rue de Villiers - 92208 Neuilly-sur-Seine cedex.

➢ **Fund Promoter:** AXA INVESTMENT MANAGERS PARIS, Tour Majunga - La Défense 9 - 6, place de la Pyramide - 92800 Puteaux.

Additional information is available, if necessary, from the following Website: www.axa-im.fr

AXA INVESTMENT MANAGERS PARIS may delegate responsibility for marketing of Fund units to third parties duly authorised by it. Since the Fund is registered with Euroclear France, its units may be subscribed or redeemed via financial intermediaries not known to the Management Company.

➢ **Delegates:**

AXA INVESTMENT MANAGERS PARIS delegates the fund accounting & middle office functions to:

STATE STREET BANQUE SA, a *Société Anonyme*
Head office: Défense Plaza - 23,25 rue Delarivière-Lefoullon - 92064 Paris La Défense Cedex, listed in the Paris Trade and Corporate Registry under no. 381 728 724.
A credit institution approved by the ACPR on 28 February 1997 and by the AMF on 21, July 1997 under authorisation no. GP 97-44.
State Street Banque S.A. ensures the accounting functions and calculates the net asset value of the fund.

***AXA INVEST
MENT MANAGERS PARIS does not delegate the Fund's administrative functions.***

II – General characteristics:

II – 1 Unit characteristics:

⇨ **ISIN code:** FR0013204161

⇨ **Nature of rights attached to the unit class :** Each unit-holder has a co-ownership right on the Fund assets proportional to the number of units held.

⇨ **Entry in a register or liabilities accounting procedure:** All units are in bearer form. The issuer account is maintained by BNP-PARIBAS SECURITIES SERVICES (as Custodian).

⇨ **Voting rights**: The Fund being a joint ownership of securities, there are no voting rights attached to the units held, all decisions are taken by the Management Company.

⇨ **Form of units**: Bearer

⇨**Breakdown:** whole units.

➢ **Fund Accounting Closing Date:** Last trading day in December on the Paris Stock Exchange.

➢ **Closing date of the first accounting year:** The first accounting year closed in December 2017.

➢ **Tax regime indications:**

Warning: according to your tax regime, possible capital gains and income linked to owning units in the fund may be subject to taxation. We recommend that you seek advice on this subject from your tax advisor.

Obligations related to the FATCA regulation

Pursuant to U.S. tax regulations, commonly referred to as FATCA (Foreign Account Tax Compliance Act), unitholders might have to provide the Management Company or it agent with some information, including without limitation, identification information such as personal identity and places of residence (tax residence and domicile) in respect of each undertaking for collective investment, to ensure that the « US Person » are identified within the meaning of FATCA [(1)].
This information may be provided to the United States tax authorities by the French tax authorities.
Failure by any unitholder to comply with this requirement could result on a 30% withholding tax levied on US sourced cash flows. Notwithstanding any diligences carried out by the Management Company in respect of FATCA, unitholders are encouraged to ensure that the broker they used to invest into this UCITS qualifies as Participating FFI.
For more details, we encourage you to seek advice from your tax advisors.

[1]*The definition of "U.S. Person" under the U.S. Internal Revenue Code is available on the axa-im.fr website (*please refer to the section *important information).*

Obligations related to the Automatic Exchange of Information (AEOI)

To be compliant with the Automatic Exchange of Information (AEOI) for tax purposes and in particular with article 1649 AC of the French Tax Code and COUNCIL DIRECTIVE 2014/107/EU of 9 December 2014 amending Directive 2011/16/EU, the unitholders shall disclose to the Fund, to the Management Company or to their representatives, any information, in particular (but not exclusive), on their personal identity, their direct and indirect beneficiaries, their ending beneficiaries and their controlling entities.

The unitholder shall reply to any request from the Management Company to disclose those information to allow the Management Company and the Fund to fulfil their declarative duties.
Those information may be subject to disclosure to foreign tax authorities by the French tax authority.

II – 2 Specific provisions:

➢ **Classification:** International bonds and others debt securities

➢ **Investment in UCIS:** Up to 10 % of the net assets

➢ **Investment objective:**

The aim of the Fund is to seek performance through exposure to the global emerging market debt.

➢ **Reference indicator:**
The Fund has no reference indicator, as the portfolio has a total return objective and aims to optimise the risk/return ratio in most market conditions. It is therefore unrelated to a market index. The use of a reference indicator could therefore lead to misunderstanding on the part of the holder.

➢ **Investment strategy:**

1. On the strategies employed:

This Fund is managed according to an approach that remains both active and fundamental, in association with an efficient risk management and a strong contribution of research teams. The Fund allocation strategy is handled using a discretionary process.

The choice of strategies is entirely discretionary and depends on the expectations of the manager.

The Manager seeks to achieve the objective of the Fund through exposure in transferable debt securities issued in the emerging debt universe worldwide. The Fund invests in transferable debt securities issued by emerging countries and public or private companies. The Manager, in its discretion, determines which countries constitute "emerging market countries".

The fund allocation strategy is based upon macroeconomic forecasts (i.e. analyzing the economic facts from a global point of view) and issuers' analysis in order to determine the active policy of the fund. In selecting securities, the Manager considers among other things:

- the price of the securities, and the issuer's financial history, condition, management and prospects
- geographical allocation
- duration positioning (duration measures, in number of years, the portfolio's modified duration to interest rate variations)
- issuer selection (creditworthiness)
- and the external and internal rating criteria

Depending on the outcome of the process described above, the manager selects issuers (countries or companies) which are denominated in hard currencies Euro, GBP or U.S. dollars and which may be classified as Investment Grade or deemed to be equivalent by the Manager(i.e. rated at least BBB- by one of the 3 rating agencies: Standard & Poor's, Moody's , Fitch). The rating of external agencies are considered in connection with the fund's investment decisions, but are not necessarily a determinative or limiting factor. Indeed, the selection and allocation of credit instruments is not exclusively and mechanically based on their publicly available credit rating but also on an internal credit or market risk analysis.

The Fund is not subject to any limitation on the portion of its assets that may be invested in one country or region, including in any emerging market country or region.

The Fund has flexibility in relation to the range of instruments in which it may invest so as to enable the Manager, in pursuit of the investment objective, to react to and take advantage of market conditions at any particular time.

The investment strategy is implemented following the rules below:

Range of modified duration between 0 month and +8 years			
Geographic area of the issuers to which the Fund is exposed	Exposure range	Currency of the securities	Currency exchange risk
Worldwide (including non OECD countries)	Between 0 % and 200%	denominated in Euros, GBP and USD	Up to 100%

The Fund's cash flow is invested in an objective of achieving liquidity, security and performance. It is to be managed both by concluding the type of transactions indicated below and by purchasing money market and derivative instruments.

2. Asset base:

Equity

The Fund may expose itself to 10% of its net assets into equities of any capitalisations, geographic and/or economic sector.

Debt securities and money market instruments

Up to 100% of its net assets:

The Fund may invest on a global basis in multiple asset classes in Investment Grade securities such as "Sovereigns", "Quasi-Sovereigns" and "Corporate bonds" which are denominated in hard currencies in Euro, GBP and US Dollars through to the following market instruments:

- Bonds and debt securities issued or guaranteed by States or supranational organisations whether or not they are members of the OECD,
- Bonds and debt securities issued by public or private companies from OECD countries or not, traded on regulated or OTC markets, at fixed rates or variable rates,
- Inflation linked bonds or convertible bonds,
- Money market instruments, Treasury Bonds or equivalent financial instruments on international markets.

The interest rate modified duration may vary between 0 month and 8 in terms of duration.

The Fund may invest (up to a limit of 10% of its net assets) in eligible financial instruments or money market instruments not meeting the conditions stipulated in Article R 214-11-I of the French Monetary and Financial Code.

Shares or units in UCITS or investment funds:

By investing in UCITS, the Fund gains exposure to diversified asset classes while benefiting from the expertise of specialised management teams and investing cash through in cash UCITS or short-term money market funds.

The Fund may invest up to 10% of its net assets in units or shares of French or European UCITS, whatever their classification.

Within this 10% limit, the Fund may also invest shares or units in French or European alternative investment funds or investment funds set up foreign law meeting the conditions stipulated in Article R 214-13 of the French Monetary and Financial Code.

Such collective investment undertaking and investment funds may be managed by AXA Group companies.

3. Derivative instruments:

In order to achieve its investment objective, the Fund may invest in the following derivative instruments, in an amount not to exceed total asset value:

- Types of investment markets:

☒ Regulated
☒ Organised
☒ Over-the-counter

- Risks on which the Fund Manager is seeking exposure (either directly or through the use of indices):

☒ Equity
☒ Interest rate
☒ Foreign exchange
☒ Credit
☐ Other risks (specify).

- Type of market intervention (all transactions to be restricted to achieving the investment objective):

☒ Hedging
☒ Exposure
☐ Arbitrage
☐ Other (specify).

- Types of instruments used:

☒ futures
☒ options
☒ swaps
☒ forward foreign exchange
☒credit derivatives
☐ other types (specify).

- The strategy for the use of derivatives to achieve the management objective:

☒ swaps, caps, forwards and other derivative financial instruments exposed to interest rate, credit, equity and exchange risks;
☒ total return swaps, credit default swaps and other financial instruments with the characteristics of hedging credit derivatives or exposure to credit risk;
☒ total return swaps, credit default swaps and other forward market instruments with the same characteristics which allow for the reconstitution of synthetic exposure to exchange or credit risks.

The commitment to derivatives may not exceed the Fund's total net asset value.

Financial derivative instruments can be used in order to take advantage of the characteristics of such instruments (notably in terms of liquidity and price) with respect to the financial instruments directly invested by the Fund. In addition, financial derivative instruments can also be used in order to facilitate adjustments following subscription and redemption requests.

Moreover, the UCITS fund may use, on an opportunistic basis, financial derivative instruments constituting total return swaps. The Management Company will be able to use such instruments for the purpose of exchanging the performance of assets held in portfolio with an agreed return defined in the confirmation of the transaction between the parties.

These instruments will be carried out as part of the achievement of the investment objective of the UCITS fund, the cash and liquidity management and/or optimisation of the UCITS fund revenues. The assets of the UCITS fund might be subject to total return swaps are usually fixed income securities issued or guaranteed by States or other type of assets comprising the portfolio of the UCITS fund. The Management Company expects that such transactions will apply to 0% of the assets of the UCITS fund; however the UCITS fund may enter into such transactions up to 100% of its assets.
Details on the past utilization of these transactions are contained in the UCITS fund‘s annual report.

The UCITS shall enter into financial derivative instruments (included total return swaps) with financial institution meeting the criteria referred to in article R214-19 II of the Monetary and Financial Code and selected by the Management Company in accordance with its order execution policy available on its internet website. In this context, the Management Company will enter into such total return swaps with credit institutions established in an OECD-Member State having a long term debt rated at least BBB- according to the ratings scale of Standard & Poor's (or dement equivalent by the Management Company).

No counterparty to such total return swaps will have discretionary decision-making power in respect of the composition or the portfolio management of the UCITS or over the composition of the underlying asset of such total return swaps. The counterparties have no discretion on the opportunity to enter into such transactions by the UCITS.

4. Securities with embedded derivatives:
The Fund may use securities with embedded derivatives within the limits of 100% of its net assets. The strategy for using embedded derivatives is the same as described for derivatives.

They may involve, for example, warrants and other instruments already mentioned under "Assets", which may be classified as embedded derivatives as regulations change.

5. Deposits:
For cash management purposes, the Fund may invest up to 100% of its total assets in deposits with one or more credit institutions.

6. Cash borrowing
Within the scope of normal operations, the Fund may on occasion find itself in a debit position and resort to cash borrowings up to a value not exceeding 10% of its total assets.

7. Temporary purchases and sales of securities

Non applicable.

8. Contracts constituting financial guarantee:

As part of the conclusion of financial derivatives instruments (including total return swaps) and/or temporary acquisition and sale of securities, and in accordance with the applicable laws, the fund may be bound to provide or entitled to receive financial guarantees (collateral) with a view to reduce its counterparty risk. Such financial guarantee may be granted in the form of cash and/or other assets, notably securities deemed liquid by the Management Company, of any maturity, issued or guaranteed by OECD Member States or by first ranking issuers whose performance is not highly correlated with that of the counterparty.
The UCITS fund may accept, as collateral representing more than 20% of its net assets, transferable securities issued or guaranteed by any supranational entity or any OECD Member State. The UCITS fund can be fully guaranteed by any of these issuers.

In accordance with its internal policy relating to the management of the collateral, the Management Company will determine:

- the required level of collateral; and

- the level of haircut applicable to the assets received as collateral, taking into account in particular the type of assets, the credit standing of the issuers, the maturity, the currency, the liquidity and the price volatility of the assets.

The Management Company will proceed, according to the valuation rules set out in this prospectus, to a daily valuation of financial guarantees received as collateral of financial derivatives instruments on a mark-to-market price basis. Margin calls collected as collateral will be implemented at least on a daily basis.

The UCITS will be able to reinvest the financial guarantees received in cash in accordance with the applicable regulation. The financial guarantees, other than cash, received as collateral of financial derivatives will not be sold, reinvested or pledged by the UCITS. The counterparties will be able to reinvest financial guarantees received from the UCITS in accordance with their applicable regulation.
The financial guarantees received by the UCITS will be kept by the depositary of the UCITS or, failing that, by any third party depositary (such as Euroclear Bank SA/NV) which is subject to a prudential supervision and that has no link with the counterparty.

Despite the creditworthiness of the issuer of the assets received as collateral or the assets acquired by the UCITS fund with the cash collateral received, the UCITS fund may be subject to a risk of loss in case of default of the issuers of such assets or in case of default of the counterparties.

➢ **Risk profile:**

General consideration:

Your money will be invested primarily in financial instruments selected by the Management Company. These instruments will be subject to market fluctuations and contingencies.

The Fund's risk profile has been adapted to an investment period of more than 5 years. Like any financial investment, potential investors must be aware of the fact that the value of the Fund's assets is subject to market fluctuations and can vary considerably (depending upon existing political, economic and stock market conditions or on the issuers' specific situation). Thus, it is possible that the Fund's performance will not match its objectives.

The Management Company does not guarantee subscribers that the capital they have invested in this Fund will be fully reimbursed, even if they keep the units for the entire recommended investment period. The capital initially invested is not likely to be fully reimbursed, the subscribers run a risk of Loss limited to the invested capital.

The risks described below are not exhaustive; it remains incumbent upon the individual investors to assess the risk inherent in each one of their investments and then to forge their own opinions.

Subscribers to this Fund are exposed to the following primary risks:

1. Credit risk:

In the event of default or deterioration the quality of private bond issuers (for example, a reduction in rating), the value of debt securities in which the Fund is invested may fall. In such case, the net asset value of the Fund will fall.

2. Interest rate risk:

The interest rate risk pertains to the depreciation in rate-based instruments over either the short or medium term stemming from interest rate variations. For purposes of illustration, the price of a fixed-rate bond tends to drop as interest rates increase.
The Fund is invested in bond instruments or debt securities; in the event of a rise in interest rates, the value of assets invested at a fixed rate will fall.

3. Risks associated with discretionary management:

The discretionary management style is based on forecasts of trends in the debt securities markets. The performance of this Fund will therefore depend on the predictions of rate curve trends as well as on the specific set of companies selected by the manager. Given that management policy is discretionary, there is a risk that the manager incorrectly predicts this trend.
The Fund may therefore not perform in line with its objectives.

4. Risk linked to commitment to derivatives:

The use of derivatives will enable the fund to expose its assets to any market, be it equities, fixed income , interest rates or foreign exchange, which could lead to a risk of a greater and faster drop in the net asset value of the fund than the markets in which the fund is invested.

5. Counterparty risk:

Counterparty risk arises from the use by the Fund of financial instruments that are traded OTC.
These transactions potentially expose the fund to the risk of a default by a counterparty.

6. Emerging Markets Risk:

Legal infrastructure, in certain countries in which investments may be made, may not provide with the same degree of investors' protection or information to investors, as would generally apply to major securities markets (governments' influence, social, political and economic instability, different accounting, auditing and financial report practises). Emerging markets securities may also be less liquid and more volatile than similar securities available in major markets, and there are higher risks associated to transactions settlement, involving timing and pricing issues.

7. Currency exchange risk:

This risk pertains to the drop in the listed currency value of those financial instruments in which the Fund has invested, with respect to its benchmark currency.
The Fund is submitted to the currency exchange risk via its involvement in international markets (outside of the Euro zone).

Ancillary risks

8. Equity risk:

Due to its classification, this Fund is submitted to risks emanating from equity markets in an ancillary manner. However for diversification purposes, the Fund may invest in equity regardless their scale capitalization, their geographic and/or economic sector.
On these markets, stock prices may fluctuate significantly depending in particular on both economic conditions and investor expectations, which could engender a risk of Fund net asset value loss. Equity markets historically display greater price volatility than the bond markets (i.e. major price swings to both the upside and downside).

9. Risk associated with investment in certain UCITS:

This Fund may invest in certain UCITS or investment funds for which a risk is incurred by virtue of an alternative management approach (i.e. a management strategy uncorrelated with any market index). The Fund would be exposed to a liquidity risk by investing in this type of funds.

10. Risks linked to securities financing transactions (temporary purchase and sale of securities, total return swaps) and risks linked to financial guarantees (collateral)

Securities financing transactions and related collateral may create risks for the UCITS such as :

(i) counterparty risk (as described above),
(ii) legal risk,
(iii) custody risk,
(iv) liquidity risk (i.e. risk resulting from the difficulty to buy, sell, terminate or value an asset or a transaction due to a lack of buyers, sellers, or counterparties), and, if relevant,
(v) risks arising from to the reuse of financial guarantees (i.e. mainly the risk that the financial guarantees reused by the UCITS might not be returned due to the failure of the counterparty for example).

➢ **Guarantee or protection:** None.

➢ **Target subscribers and typical investor profile:** All subscribers; this Fund is more specifically intended to be subscribed by AXA MedLA's companies.
With the exception of the Management Company or an entity belonging to the same group which can only subscribe to one unit, the minimum initial subscription is 100 000 Euros.

This Fund is aimed at investors looking to expose their investments to the interest rate and credit markets worldwide.

The Units cannot be subscribed, sold or offered directly or indirectly to retail investors within the meaning of Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments ("Retail Investor").

Investors' attention is drawn to the operating and oversight conditions in emerging markets, which may differ from the standards prevailing on major international exchanges.

The reasonable amount to invest in this fund depends on the personal situation of each investor. In order to determine the amount, each investor should take into account personal assets and their regulation, of current needs during an investment time-frame of over 4.5 years, and also of their willingness to take risks or make prudent investments. It is also strongly recommended that investments be sufficiently diversified so as to not expose them solely to the risks of this Fund.

Restrictions related to US Investors
The units of each Fund have not been and will not be registered under the U.S. 1933 Act and the Fund has not been and will not be approved under the U.S. Investment Company 1940 Act.
Consequently, the units may not be subscribed, sold or offered directly or indirectly in the United States or to or for the account or benefit of any US citizen hereafter "U.S. Person" or any person who is subject (i) to the provisions of the title 1 of the U.S. Employee Retirement Income Security Act (hereafter "ERISA Plan") or (ii) to the provisions of section 4975 of the U.S. Internal Revenue Code or any person qualified as "Benefit Plan Investor" under the ERISA Plan regulation.
Unitholder shall have to qualify as "Non-United States Person" under the Commodity Exchange Act.

The definitions of "U.S. Person", "Non-United States Person" and "Benefit Plan Investor" are available on the axa-im.fr website *(*please refer to the section *important information)*. For the purpose of this prospectus, "US Investors" are "U.S. Person", "Benefit Plan Investor", any person subject to ERISA Plan and any person who is not "Non-United States Person".

Unitholder may have to certify in writing of it non US Investor status before any subscription. In the event it became US Investor, it should be no longer allowed to acquire units and should inform the management company of the Fund which, when appropriate, may compulsorily redeem any units held by an US Investor.

Exemptions may be granted in a written form by the management company of the Fund in particular with regard to the applicable law.

The recommended minimum investment period is 4.5 years.

➢ **Calculation and allocation of the Distributable Amounts:** capitalisation and/or distribution.

The Distributable Amounts are made up in accordance with legal provisions, by
- net income plus retained earnings, plus or minus the balance of the income equalisation;
- the capital gains, net of fees, minus any decline in value, net of fees, recorded during the year, plus the net capital gains of the same kind from previous years that have not been subject to distribution or capitalisation, plus or minus the balance of the accrual of capital gains.

➢ **Distribution frequency:**

The Distributable Amounts, independently of one another, will be capitalised and/or distributed and/or carried over, in whole or in part, as determined by the Management Company at the end of the year.

Advance payments may be distributed during the year, if so decided by the management company and within the limits of the Distributable Amounts realised on the date of the decision.

➢ **Characteristics of the units:** Units are complete units denominated in Euros.

➢ **Subscription and redemption process:** Subscription and redemption orders, to be exclusively instructed in number of units, are received by the depositary every day until midday and are executed on the basis of the next available net asset value (i.e. at an unknown price).

Subscriptions/redemptions will be paid/delivered no later than two trading days following the determination of the net asset value.

All subscription and redemption requests are centralised by BNP–PARIBAS SECURITIES SERVICES (BPSS), with offices at the following address:

BNP – PARIBAS SECURITIES SERVICES (BPSS)
Grands Moulins de Pantin
9, rue du Débarcadère
93500 Pantin

➢ **Frequency of calculation for the net asset value:** Daily.

The net asset value shall not be determined or published on trading days which fall on French or US legal holidays and in the event of NYSE Euronext holidays. The reference stock market calendar to be used is that of NYSE Euronext.

➢ **Place of publication of the Net Asset Value**: Management Company's offices.

➢ **Fees and commissions:**

Subscription and redemption fees:

Subscription and redemption fees may increase the subscription price paid by the investor or reduce the redemption price. Fees payable to the Fund offset the costs incurred by the Fund in investing or disinvesting the assets assigned. Fees not paid to the Fund revert to the Management Company or promoter.

Fees payable by the investor, levied on subscriptions and redemptions	**Basis**	**Rate scale**
Subscription fee not payable to the Fund	Net asset value x number of units	➢ Maximum: 10% (AXA MedLA companies are exempt from payment of this fee.)
Subscription fee payable to the Fund	Net asset value x number of units	Nil
Redemption fee not payable to the Fund	Net asset value x number of units	Nil
Redemption fee payable to the Fund	Net asset value x number of units	Nil

Management fees:
These fees cover all the fees invoiced directly to the Fund, with the exception of transaction fees. Transaction costs include intermediary fees (brokerage, stock market taxes, etc.) and account activity charges, if any, that may be levied by the custodian and the Management Company.

The following can be added to the operation and management fees:
- Movement fees invoiced to the Fund;
- The remuneration received by the stocklending agent and the costs, direct and indirect operating costs resulting from the implementation of the temporary acquisition and sale of securities.

	Fees invoiced to fund	**Base**	**Rate schedule**
1	Management Fees	Net assets (excluding underlying mutual funds)	Maximum rate: 0.40% These fees are directly assigned to the income statement of the Fund
	Management costs external to the portfolio management company (auditor, custodian, distribution, lawyers)		
2	Maximum indirect costs (commissions and fees)	Assets of underlying UCIs	N/A
3	Movement fee Custodian	levied upon each transaction	50 € maximum, inclusive of tax.
4	Performance fee	Net assets	None

For any additional information, investors can refer to the annual report of the Fund.

Selection of the brokers/ intermediaries:

The manager's process for the selection of intermediaries is based on:
- A due diligence stage which involves data collection requirements,
- A participation of all departments involved or concerned by the entry into relationship with a counterparty or a broker in addition to the Portfolio Management teams, Risk Management , Operations, Compliance and Legal departments.
- An independent vote exercised by each team.

III –Commercial information:

All information concerning this Fund as well as the latest annual and interim reports and the net asset value may be obtained by direct application to the Management Company at the following postal address:

AXA INVESTMENT MANAGERS PARIS
Management Company
Tour Majunga - 6 place de la Pyramide
92908 PARIS – La Défense cedex

All subscription and redemption requests are centralised by BNP–PARIBAS SECURITIES SERVICES (BPSS), with offices at the following address:

BNP – PARIBAS SECURITIES SERVICES (BPSS)
Grands Moulins de Pantin
9, rue du Débarcadère
93500 Pantin

ESG criteria:

Information on Social, Environmental and Corporate Governance criteria are available on the website of the Management Company (www.axa-im.com) and are be disclosed in the annual report.

The Management Company informs Unitholders that professional Fund's Unitholders subject to regulatory requirements such as those of the European Directive 2009/138/EC (Solvency 2) may receive the Fund's holdings before the availability of such information to all Unitholders.

Voting rights policy and access to the voting rights report :

Information on the voting rights policy and report related to the exercise of the voting rights are available on the management company website (www.axa-im.fr).

IV –Investment rules:

Consistent with the regulatory section of the Monetary and Financial Code.

Modifications to the Monetary and Financial Code will be taken into account by the Management Company in the management of the Fund as soon as they are implemented.

VI – Risk monitoring:

The method for calculating the total risk of the fund is the same as for calculating the commitment.

VII – Asset valuation and accounting rules

The portfolio is valued at the time of each net asset valuation and at the closing of the annual accounts according to the following guidelines:

Transferable securities:

Financial instruments and securities traded on a regulated market in France or abroad:

- French and European zone securities and foreign securities traded on the Paris Stock Exchange: closing price on the day of valuation (source: Thomson-Reuters).

- Securities traded within the Pacific zone: closing price on the day of valuation (source: Thomson-Reuters).

- Securities traded within the Americas: closing price on the day of valuation (source: Thomson-Reuters).

- Transferable securities whose price has not been reported on the day of valuation are to be valued at their most recent officially-published price or at their probable trading value, as determined under the responsibility of the Management Company.

- Currency: Foreign values are to be converted into Euro equivalent values depending on the currency exchange rates quoted at 4:00 pm in London on the day of valuation (source: Reuters).

- Bonds or fixed-income products: These are valued daily on the basis of the information provided by an eligible third party provider and weighted depending on such product's characteristics. The clean price is calculated in accordance with the Bloomberg method.

- *Bon du Trésor à intérêts annuels (BTAN), bon du Trésor à taux fixe et à intérêt précompté (BTF)* and *billets de trésorerie (T-bills):*

- BTANs, BTFs and T-bills (excluding French issuances) with a maturity at issuance of less than three months, at the date of acquisition, or having a residual life not exceeding three months as of the valuation day of the AIF, are to be valued according to the simplified method (i.e. linearization). In case of material markets volatility, the simplified method would be abandoned and the instruments would be valued according to the method dedicated to BTANs, BTF and T-bills (excluding French issuances) having a maturity in excess of three months.

- BTANs, BTFs and T-bills (excluding French issuances) with a maturity at issuance that exceeds three months, at the date of acquisition, or having a residual life exceeding three months as of the valuation day of the AIF, are to be valued at their market value on the basis of the information provided by an eligible third party data provider and ranked by order of priority (BGN, Bloomberg).

Nonetheless, the following instruments are to be valued in accordance with the specific methods indicated below:

<u>UCI shares or units:</u>

- UCI shares or units are to be valued at their latest official valuation day of the Fund. However, for UCI whose units or shares are valued at a date other than the valuation day of the Fund, such UCI are valued on the basis of estimates under the control and responsibility of the Management Company.

<u>Negotiable debt securities:</u>

- Negotiable Debt Securities (NDS) with a maturity date lying within three months:

- Those NDS with a period lasting less than three months upon issuance, or at the acquisition date, or whose remaining period becomes less than three months at the time of net asset value determination, are to be valued according to the simplified method (i.e. linearization).
- Should a credit-related event alter the issuer's credit, the simplified method would be abandoned in favor of valuing the NDS at the market price in following the method applied for NDS with a maturity in excess of three months.

- Negotiable Debt Securities (NDS) with a maturity date lying beyond three months:

These securities are valued by application of an actuarial method, with the selected discounting rate being that of the equivalent securities issues along with the assignment, if necessary, of a deviation representative of the security issuer's intrinsic characteristics (i.e. issuer's market spread).

The market rates used for these purposes are the following:

- o for the Euro, the EONIA swap curve (OIS method);
- o for the USD, the Fed Funds swap curve (OIS method);
- o for the GBP, the SONIA swap curve (OIS method).
- o for the YEN, the TONAR swap curve.

The discounting rate has been interpolated (by means of linear interpolation) between the two closest listed periods that frame the security's maturity date.

Securitization instruments:

- Asset back securities (ABS): ABS are valued on a weekly basis by means of a valuation closing rate at the market value based on a median price determined from all the bid prices communicated by the eligible data providers.
- Collateralized Debt Obligations (CDO): CDO are valued on a monthly basis at a bid price communicated by arranger bank, by “Lead Manager” or committed counterparties.

<u>Temporary securities acquisition and sales transactions:</u>

- Lending/borrowing:

  - o Securities lending: The securities lent are valued at the securities' market value; the debt representative of the securities lent is to be valued according to contractual stipulations.

  - o Securities borrowing: The debt representative of the securities borrowed is to be valued according to contractual stipulations.

- Repurchase agreements:

  - o Reverse repurchase agreements: The debt representative of the securities received in repurchase agreements is to be valued according to contractual stipulations.

  - o Repurchase agreements: The securities contributed to repurchase agreements are to be valued at the securities' market value; the debt representative of the securities given towards repurchase agreements is valued according to contractual stipulations.

Financial instruments not traded on a regulated market:

Such instruments are to be valued under Management Company responsibility at their likely traded value.

<u>Derivatives instruments</u>

<u>Futures contracts:</u>

Valuation is carried out on the basis of the compensation price (or last price) on the day of valuation.

These contracts are carried for their market value as determined based on the principles both listed above in the off-balance sheet commitments and within the set of risk exposure tables. Conditional futures transactions (options) are translated into underlying equivalents in off-balance sheet commitments and risk exposure tables.

⇨Over-The-Counter (OTC) Derivatives (without monetary management):

OTC Derivative instruments are valued at market value on the basis of valuations provided by counterparties, under Management Company responsibility.

⇨OTC Derivatives within monetary management:

⇨ Financial exchanges:

- Rate swaps with a maturity date lying within three months:

All swaps reaching maturity in less than three months at the swap initiation date or at the date the net asset value is calculated are to be valued linearly.
In the event the swap was not backed by a specific asset and in the presence of a strong variation in interest rates, the linear method would be abandoned in favor of valuing the swap according to the method reserved for rate swaps with maturities of beyond three months.

- Rate swaps with a maturity date lying beyond three months:

- EONIA, FED FUNDS, TONAR or SONIA swap curve:

These swaps are to be valued according to the return cost method.
Each time the net asset value is calculated, the interest rate and/or currency rate exchange contracts are valued at their market value as a function of the price calculated by discounting future cash flows (both principal and interest) at the market interest rate and/or currency rate.
This discounting is performed by making use of a zero-coupon rate curve.

When the residual maturity of the swap drops to below three months, the linearization method is applied.

- Interest rate swaps against a EURIBOR or LIBOR reference:

These swaps are valued at the market price, on the basis of valuations provided by counterparties, under Management Company responsibility.

Valuation of swaps in the off-balance sheet table of commitments:

  - Swaps with a remaining period of less than three months: nominal + differential of accrued interest;
  - Swaps with a remaining period of greater than three months;
  - Fixed rate / variable rate swaps: Valuation of the fixed-rate leg at market price;
  - Variable rate / fixed rate swaps: Valuation of the variable-rate leg at market price.

- *Contract for difference* (CFD): CFD instruments are valued at their market value on the basis of the closing price on the day of valuation for the underlying securities. The stock market value of the corresponding lines indicates the differential between the stock market value and the strike value of the underlying securities.
- Credit Derivatives Swaps (*CDS*): CDS are valued on the standard method as recommended by ISDA (sources: Markit in respect of the CDS curve and the recovery rate and Bloomberg in respect of interest rate curves).

- Forex Forwards: forward forex are valued on the basis of:
- the notional;
- the exercise price;
- the discount factor applicable to the remaining period;
- the current exchange market rate;
- the relevant forward exchange rate, defined as the product of the current exchange market rate and the relevant discount factor applicable to such currency.

⇨ Other instruments:

- Complex securities are valued at their market value on the basis of prices calculated by the counterparties, under the control and responsibility of the Management Company.

  - Synthetic products: Securities set up in currencies and covered by currency exchange contracts against the Euro, whether or not they have been concluded with a single and unique counterparty, are to be analyzed just like synthetic products given that they meet the following conditions: the exchange contract is concluded simultaneously with the security acquisition and features the same amount and due date.

In this case, and by analogy with the possibility offered in current regulations, no separate recording is completed for the security in currency and the associated exchange contract, but rather a global accounting in Euros for the synthetic product. These products will be subject to a global valuation at the market rate and/or at the currency exchange rate resulting from the exchange, within the scope of contractual stipulations.

➢ **Accounting methods:**

The accounting method applied to the Fund's income will be performed according to the accrued coupons method.

All trading costs are to be accounted for within specific Fund accounts and thus do not get added to the cost price of transferable securities (excluding fees).

The WACC (or Weighted Average Cost of Capital) is adopted as the securities liquidation method. However, the FIFO (First In, First Out) method is used in the case of derivatives.

VIII. Remuneration policy

AXA Investment Managers Paris has approved and adopted AXA IM's Global Remuneration Policy, in accordance with the applicable regulations, which is consistent with, and promotes, sound and effective risk management; does not encourage risk-taking which is inconsistent with the risk profiles of the Fund and does not impair compliance of its duty to act in the best interests of each Fund.

AXA IM's Global Remuneration Policy, which has been approved by the AXA IM Remuneration Committee, sets out the principles relating to remuneration within all entities of AXA IM (including AXA Investment Managers Paris) and takes into account AXA IM's business strategy, objectives, and risk tolerance, as well as the long-term interests of AXA IM's shareholders, employees and clients (including the Fund). The AXA IM Remuneration Committee is responsible for determining and reviewing the AXA IM remuneration guidelines, including the AXA IM Global Remuneration Policy, as well as reviewing the annual remuneration of senior executives of the AXA IM Group and senior officers in control functions.

AXA IM provides both fixed and variable remuneration. An employee's fixed remuneration is structured to reward organizational responsibility, professional experience and the individual's capability to perform the duties of the role. Variable remuneration is based on performance and may be awarded annually on both a non-deferred and, for certain employees, a deferred basis. Non-deferred variable remuneration may be awarded in cash or, where appropriate and subject to local laws and regulation, in instruments linked to the performance of AXA IM funds. Deferred remuneration is awarded through various instruments structured to reward medium and long term value creation for clients and AXA IM and long term value creation for the AXA Group. AXA IM ensures appropriate balances between fixed and variable remuneration and deferred and non-deferred remuneration.

Details of the up to date AXA IM Global Remuneration Policy are published online at https://www.axa-im-international.com/remuneration. This includes the description of how remuneration and benefits are awarded for employees, and further information on the AXA IM Remuneration Committee. The Management Company shall provide a paper copy free of charge upon request.

COLUMBUS EM DEBT STRATEGY
(FCP offered to the public)

Custodian:	BNP PARIBAS SECURITIES SERVICES 3, rue d'Antin F-75078 PARIS CEDEX 02
Management Company (reg. office):	AXA INVESTMENT MANAGERS PARIS Tour Majunga - La Défense 9 6, place de la Pyramide 92800 Puteaux

R E G U L A T I O N S

Approved by the Autorité des Marchés Financiers (A.M.F.)
on 7 October 2016

SECTION I

ASSETS AND UNITS

Article 1 – Co-ownership units

The co-owners' rights are represented by units, each unit corresponding to the same fraction of the Fund's assets. Each unit-holder has a co-ownership right in relation to the Fund's assets proportionate to the number of units held.

The Fund's term is 99 years from the date of its creation by the French Financial Markets Authority (AMF), except in the event of early dissolution or extension as set forth in the present management regulations.

The Fund reserves the right to issue different classes of units. The characteristics of the different classes of units and their eligibility requirements are specified in the prospectus and of the FCP.

The different classes of units may:
- benefit from different dividend policies (distribution or accumulation);
- be denominated in different currencies;
- charge different management fees;
- charge different subscription and redemption fees;
- have a different nominal value.

The Fund may merge or divide the units.

The Board of Directors of the Management Company may decide that the units shall be sub-divided into tenths, hundredths, thousandths, ten thousandths or even hundred thousandths, such subdivisions being referred to as fractions of units.

The provisions of the regulations governing the issue and redemption of units shall apply to fractions of units whose value shall always be proportionate to that of the units they represent. Unless otherwise provided for, all other provisions of the regulations relating to units shall apply to fractions of units without any need to make a specific provision to this effect.

Finally, the Board of Directors of the Management Company may decide, at its own discretion, to either merge or sub-divide the units by issuing new units which shall be allocated to unit-holders in exchange for their existing units.

If the Fund is a feeder UCITS, the unit-holders of this feeder UCITS will be issued with the same information as if they held units or shares in the master UCITS.

Article 2 – Minimum capital

Units may not be redeemed if the assets of the FCP or sub-fund fall below 300,000 Euros; under these circumstances, unless the value of the assets is reinstated, the Management Company when the funds assets remains below this amount for 30 days, the Management Company shall take the necessary measures to liquidate the fund in question or to carry out one of the operations mentioned in the article 422-17 of the AMF General Regulation.

Article 3 – Issue and redemption of units

Units are issued each time a subscription is received on the basis of their net asset value plus a subscription fee, where applicable.

Subscriptions and redemptions are executed according to the conditions and procedures defined in the prospectus.

FCP units may be admitted to an official stock exchange listing in accordance with legislation currently in force.

Subscriptions must be paid up in full at the net asset value calculation date.

Subscriptions may be in the form of cash and/or contribution in kind in the form of transferable securities. The Management Company is entitled to refuse any securities offered and, to this effect, must announce its decision within seven days of the date on which the securities were tendered. If accepted, the securities contributed in kind are valued according to the rules laid down in Article 4 and the subscription is based on the first recorded net asset value following acceptance of the securities concerned.

Redemptions will be in cash only, except in the event of liquidation of the Fund when unit-holders have agreed to be reimbursed in securities or the prospectus stipulate an option of redemption by the remittance of securities, to be valued according to the rules laid down in Article 4. The redemption price will be payable by the custodian within 5 days of the unit valuation date.

However, if in exceptional circumstances the redemption requires the prior sale of assets held in the Fund, this deadline may be extended to a maximum of 30 days.

With the exception of succession or an inter vivos gift, the sale or transfer of units between unit-holders or unit-holders and third parties is treated as a redemption followed by a subscription; if this involves a third party, the sale or transfer value must, if necessary, be made up by the beneficiary to at least the initial minimum subscription value stipulated in the prospectus.

By application of Article L.214-8-7 of the *Code Monétaire et Financiers*, the French Financial and Monetary Code, the redemption of units by the FCP and the issue of new units may be provisionally suspended by the Management Company in exceptional circumstances and if dictated by the interests of unit-holders.

If the net assets of the FCP fall below the minimum threshold set by the regulations, no redemptions shall take place.

The minimum subscription conditions are stipulated in the prospectus.

The FCP may cease to issue units by application of Article L.214-8-7, paragraph 3 of the French Monetary and Financial Code under the following circumstances:

- in objective situations leading to the termination of subscriptions, such as the attainment of a maximum issue of units or shares, the attainment of maximum number of assets or the expiry of a specific subscription period. These objective situations are defined in the prospectus for the UCITS.

The Management Company of the Fund may limit or prevent direct or indirect holding of Units by any US Investor.

For this purpose, the Management Company of the Fund, if it is considered that the holding of Units by US Investor is contrary to applicable laws or to the Fund's interest, may:

(i) Decline to issue Units when it is apparent that the issue of such Units would or could result in a direct or indirect holding of Units by a US Investor;
(ii) require, at any time, from any person or entity whose name appears in the Fund register any relevant information together with a declaration of honor, for the purpose of determining if the beneficiary of the Units is an US Investor or not; and/or
(iii) proceed to compulsory redemption of all Units held by Unitholder when the latter is (a) a US Investor and (b) the beneficial owner, alone or jointly with the other Unitholders of the Units.

The mandatory redemption will be carried out on the last known net asset value less applicable fees and commissions that would remain payable by the Unitholder.

This power also applies to any person who (i) would directly or indirectly infringe any laws and regulations or governmental authorities or (ii) would cause, in the view of the management company of the Fund a damage for the Fund that it would have not otherwise incurred.

Article 4 – Calculation of net asset value

The net asset value of units is calculated in accordance with the valuation rules specified in the prospectus.

Contributions or redemptions in kind will be restricted to securities or contracts eligible for inclusion in the UCITS assets; they will be valued according to the valuation rules applicable to calculation of the net asset value laid down in the prospectus.

SECTION II

OPERATION OF THE FUND

Article 5 – The Management Company

The Fund is managed by the Management Company in accordance with the policy defined for the Fund.

The Management Company shall act in all circumstances on behalf of unit-holders and may exclusively exercise the voting rights attached to securities held in the Fund.

Article 5a - Operating Rules

The instruments and deposits eligible for inclusion in the Fund's assets and applicable investment rules are described in the prospectus.

Article 6 - Custodian

The custodian is responsible for all missions entrusted by the applicable laws and regulations and those that were contractually assigned. In case of dispute with the Management Company, it informs the Autorité des Marchés Financiers. In the event of a dispute with the Management Company, the custodian shall notify the AMF to this effect.

If the Fund is a feeder UCITS:

➢ The custodian must have entered into an information exchange agreement with the custodian of the master UCITS.

➢ If also custodian of the master UCITS, the custodian must prepare appropriate specifications.

Article 7 – The Auditor

An auditor has been appointed by the Board of Directors of the Management Company for a term of six financial years with the approval of the AMF.

The auditor carries out any checks and audits laid down in law and, in particular, certifies as necessary the authenticity and regularity of the financial statements and the accounting information contained in the annual report.

The auditor shall be subject to re-appointment.

The auditor shall inform the AMF and Fund Management Company of any irregularities or misrepresentations ascertained during the performance of his mission.

The auditor shall supervise the valuation of assets and determination of exchange parities in the event of a conversion, merger or split.

The auditor shall assess all contributions in kind and assume responsibility for preparation of a report on the relevant valuation and remuneration.

The auditor shall certify the accuracy of the composition of the assets and other information prior to publication.

The auditor’s fees are determined by mutual agreement of the auditor and Board of Directors of the Management Company on the basis of a work schedule stipulating the functions required.
In the event of liquidation, the auditor shall value the assets and prepare a report on the terms and conditions of liquidation.

The auditor will certify the situations on which the distribution of interim dividends is based.

It the Fund is a feeder UCITS:

➢ The auditor must have entered into an information exchange agreement with the auditor of the Master UCITS.

➢ If the auditor acts for both the feeder and master UCITS, the auditor must draw up an appropriate work schedule.

The auditor's fees shall be included in the management fees.

Article 8 - Financial statements and annual report

At the end of each financial year, the Management Company prepares financial statements and a report on the Fund’s management during the past financial year.

The Management Company shall draw the assets inventory of the UCI at least semi-annually and under control of the custodian. All the above documents are reviewed by the auditor.

The Management Company shall make these documents available to unit-holders within four months of the financial year-end and notify them of their income entitlement: the documents are posted out at the express request of unit-holders or made available at the offices of the Management Company.

SECTION III

PROCEDURES FOR APPROPRIATION OF NET INCOME

Article 9 – Appropriation of Distributable Incomes

The net income for the financial year is equivalent to the value of interest, arrears, dividends, premiums and bonuses, directors' fees and any income generated by the securities held in the Fund's portfolio, plus income generated by temporary cash holdings, less management fees and borrowing costs.

The Management Company decides on the appropriation of Distributable Incomes (hereinafter "the Distributable Incomes").

The Distributable Incomes are equivalent to:

- The net income for the financial year plus retained earnings, adjusted with the net income equalization account relating to the year ended,
- The net realised capital gains, decreased with net realised capital losses, recognised throughout the financial year, plus net capital gains of the same type realised during the preceding financial years which have not been distributed or capitalised and adjusted with the capital gain equalization account relating to the year ended.

For each class of unit, the Prospectus requires the FCP to adopt one of the following methods:

- ***pure accumulation**:*

The Distributable Incomes shall be accumulated in full each year.

- pure distribution:

The Distributable Incomes are distributed within the following limits:

- the net income shall be distributed in full, rounded upwards or downwards as applicable,
- the net realised capital gains may be fully or partly distributed, upon Management Company decision.

The undistributed Distributable Incomes will be allocated to retained earnings account.

The Management Company may decide during the year to distribute one or more interim dividends up to the limit of the Distributable Incomes recorded at the date of the decision to this effect.

- accumulation and/or distribution:

The Management Company decides on the appropriation of the Distributable Incomes each year: the Distributable incomes, independently of each other, may be capitalised and/or distributed and/or reported, fully or partly.

The Management Company may decide during the year to distribute one or more interim dividends up to the limit of the Distributable Incomes recorded at the date of the decision to this effect.

SECTION IV

MERGER - SPLIT - DISSOLUTION - EXTENSION - LIQUIDATION

Article 10 - Merger - Split

The Management Company may transfer all or part of the Fund’s assets to another UCITS under its management or split the Fund into two or more mutual funds under its management.

Such mergers or splits may only be carried out after unit-holders have been notified to this effect. Such mergers or splits shall give rise to the issue of a new certificate indicating the number of units held by each unit-holder.

Article 11 - Dissolution - Extensions

- If the Fund’s assets remain below the value stipulated in Article 2 above for thirty days, the Management Company shall notify the AMF to this effect and, except in the event of a merger with another FCP, dissolve the Fund.

- The Management Company may dissolve the Fund prematurely; it shall inform unit-holders of its decision and, as of that date, subscription and redemption orders shall no longer be accepted.

- The Management Company shall also dissolve the FCP if a request is made for the redemption of all units, if the custodian’s appointment is terminated and no other custodian has been appointed, or at the expiry of the Fund’s term, unless extended.

The Management Company will inform the AMF by post of the dissolution date and procedure. The Management Company will then forward the auditor's report to the AMF.

The extension of the Fund's term may be decided by the Management Company by agreement with the custodian. This decision must be taken at least 3 months in advance of the expiry of the Fund’s term and notified to the unit-holders and the AMF.

Article 12 - Liquidation

In the event of dissolution, the custodian or, where applicable, the Management Company, acts as the liquidator, failing which the liquidator is appointed by the court at the request of any interested person. They shall for this purpose be vested with full powers to sell the Fund’s assets, pay off any creditors and distribute the available balance to unit-holders in cash or securities.

The auditor and custodian shall continue to perform their duties until the completion of liquidation procedures.

SECTION V

DISPUTES

Article 13 – Jurisdiction – Election of domicile

All disputes relating to the Fund, arising during its term or in the course of its liquidation among unit-holders or between unit-holders and the Management Company or custodian, shall be subject to the jurisdiction of the competent courts.