



# Whistleblowing: A practical guide



CRÉDIT AGRICOLE S.A.

Compliance Direction – Version of 04/9/2019

## Who can submit an alert?



All employees of the Group entities, as well as external and occasional employees, subcontractors and suppliers with whom the Group has established commercial relations.

## What kind of facts are covered?

The following acts are likely to be the subject of a report:

- A crime (e.g. aggravated theft, rape, torture, terrorist attack...)
- An offense (e.g. fraud, corruption, misappropriation of corporate assets, breach of trust, illegal taking of interest, sexual or moral harassment, discrimination...)
- A serious and manifest violation of an international commitment
- A serious and manifest violation of a unilateral act of an international organization taken on the basis of a regularly ratified international commitment
- A serious and manifest violation of the law or a regulation
- A serious threat or harm to the general interest
- Any conduct or situation against the Group's anticorruption code of conduct
- Any serious violation of human rights and fundamental freedoms, the health and safety of persons or the environment resulting from the activities of the Group, as well as the activities of subcontractors or suppliers with whom an established commercial relationship has been maintained, where such activities are related to this commercial relationship

Exceptions: Cases covered by the national defense secret, medical secrecy or the secrecy of the relationship between a lawyer and his client.

## How to submit an alert?



In case that reporting the dysfunction through the hierarchical channel is found to be ineffective, unsuitable for the situation, your hierarchy does not act or you have been pressured, implement the procedure of the right of alert by using the following link:

<https://www.bkms-system.com/Groupe-Credit-Agricole/ethic-alerts>

This link is available 24 hours a day, 7 days a week from any connection device. It is unique for all Crédit Agricole Group employees.

All information, even personal information, is encrypted and stored in a secure, independent environment.

The whistleblower is advised to provide his identity in order to be able to benefit from the protection the law grants them. However, he can also choose to remain anonymous, in which case he can exchange with the person in charge of processing the alert via a secure "dialog box". This information exchange system does not rely on standard messaging; the communicated information is encrypted and does not leave the secured system.

## Who processes the alert and within what timeframe?

- The "whistleblower referent" of the entity, as well as the designated persons to handle the alerts (generally from the Compliance Department), treat the alerts and only communicate them to the personnel whose involvement is imperative for the processing of the alert.

Special case: if the person targeted by the alert is the "whistleblower referent" of the entity or one of the persons designated to process the alerts, it is necessary to escalate it to the N+1 level, in other words at the holding company level (1) or of the Crédit Agricole Group (2).

(1) To the question *“please specify the exact name of the entity where the incident occur”* respond *“not specified”* or *“unknown”*

(2) To the question *“In which main entity/group of entities/ holding did the incident occur”* respond *“not specified”* or *“unknown”*

- The whistleblower is informed of the reception of his alert, of the estimated delay of regarding to its treatment (reasonable delay 2 months) and of the actions that will be taken in the future.

## How is the whistleblower protected?



- The identity of the whistleblower and the persons concerned by the report as well as the information collected by all the recipients of the report are handled in a strictly confidential way.
- Once the alert is processed, the data contained in the report will be archived after anonymization
- The whistleblower is not criminally in charge if he has acted selflessly (no compensation) and in good faith (truthfulness, absence of defamation) concerning facts of which he has been personally aware that he has reported in compliance with the reporting procedure.
- The whistleblower may not be sanctioned, dismissed or subject to any direct or indirect discriminatory measure, particularly in regards to remuneration or professional promotion.