

Fight against corruption and influence peddling at Crédit Mutuel Arkéa

One ambition, to inspire confidence

To achieve this, rules of good conduct must be observed, in particular the **promotion of ethical behaviour by all stakeholders.**

How ?

In particular? by promoting the fight against corruption and influence peddling.

A zero-tolerance policy

In line with its Raison d'être as a supportive, ethical and inclusive company, Crédit Mutuel Arkéa aims to set an example both in the way it behaves towards its clients and towards all of its stakeholders.

In this capacity, the Chairman of the Board of Directors of Crédit Mutuel Arkéa, for the Board of Directors, and the Managing Director, for the Executive Committee, are committed to the fight against corruption and influence peddling and affirmed the principle of zero tolerance by signing an **anti-corruption declaration on December 9, 2021**, International Anti-Corruption Day. The formalized approach for all employees, directors and service providers of the Crédit Mutuel Arkéa group has been countersigned by all members of the Executive Committee. The statement associated with this approach is published on the institutional website of Crédit Mutuel Arkéa and shared with all the directors of Crédit Mutuel de Bretagne and Crédit Mutuel du Sud-Ouest. It is also included in the training materials.

The 'Fight against corruption and influence peddling' framework, the cornerstone of Crédit Mutuel Arkéa's anti-corruption measures

Crédit Mutuel Arkéa attaches great importance to compliance with the provisions applicable in the fight against corruption and trading in influence, and implements a system for preventing and detecting corruption that integrates all the pillars of the system introduced by the law n° 2016-1691 of December 9, 2016 relating to transparency, the fight against corruption and the modernization of economic life (law "Sapin 2").

Thus, in accordance with the aforementioned provisions, Crédit Mutuel Arkéa has adopted a **code of conduct aimed at identifying and preventing acts of corruption or trading in influence**. This code is included in the internal regulations of Crédit Mutuel Arkéa. It describes the situations and behaviors to be proscribed as likely to constitute acts of corruption and the practices constituting breaches of probity. In this capacity, it deals notably with gifts and invitations and conflicts of interest. The code of conduct also provides for **disciplinary consequences** sanctioning the proscribed behaviors.

In order to enable the collection of reports relating, in particular, to the existence of conduct or situations potentially contrary to this code of conduct, to put an end to it and to sanction them where appropriate, Crédit Mutuel Arkéa implements a **professional warning system**. This device guarantees the confidentiality and protection of the whistleblower.

In order to identify, evaluate, prioritize and manage the corruption risks inherent in its activities, Crédit Mutuel Arkéa has drawn up a **mapping of corruption and influence peddling risks**. As an illustration, the operations of patronage and sponsorship are identified there. By their nature, these operations are indeed likely to induce a risk of corruption. Specific measures aimed at preventing such risks have therefore been put in place. Within this mapping, Crédit Mutuel Arkéa has also identified the risks with an accounting impact in order to ensure that the measures allowing them to be prevented and the associated controls are sufficiently comprehensive

On the basis of risk mapping, Crédit Mutuel Arkéa implements **evaluation procedures for third parties** (clients, suppliers, intermediaries, subcontractors, etc.) in order to verify that those with whom it has dealings, or plans to have dealings, a relationship presents sufficient guarantees in terms of integrity. In addition, **anti-corruption accounting control procedures** help to secure Crédit Mutuel Arkéa and contribute to the control of risks in general and corruption risks in particular.

To guarantee irreproachable ethics for all employees, they therefore have internal procedures to guide them on a daily basis and are regularly **made aware of and trained** in the rules of deontology and professional ethics.

Controlled internal procedures

In order to ensure the **adequacy and effectiveness of corruption prevention and detection measures** implemented on the basis of its mapping of corruption risks, Crédit Mutuel Arkéa submits its anti-corruption and influence peddling scheme to the internal control system of the Crédit Mutuel Arkéa group as defined in its internal control charter.

The internal control system implemented in this respect meets four objectives:

- **monitor the implementation of measures** for preventing and detecting corruption and **test their effectiveness**;
- **identify and understand the shortcomings** in the implementation of procedures;
- **define appropriate recommendations** or other corrective measures, if necessary, in order to improve the effectiveness of the anti-corruption compliance program;
- **detect**, if applicable, **acts of corruption**.

This framework is based on :

- **first-level controls** on a daily basis by the operational or support teams (self-checks or back-checks) or by the hierarchy,
- **second-level controls** by the head of permanent control according to a control plan established upstream,
- **third level controls** by the internal audit.

An annual permanent second-level control plan is thus deployed in order to ensure the proper implementation of the system's requirements.

As part of this permanent control, Crédit Mutuel Arkéa verifies in particular that the risks mapping of corruption and influence peddling is regularly updated, that the evaluation of clients and partners (suppliers, intermediaries, beneficiaries of sponsorship and patronage operations...) with regard to the risk of corruption is well carried out, that the accounting controls which contribute to the prevention and detection of the risk of corruption (justification of accounting balances, monitoring of sensitive accounts, monitoring of manual entries) are well implemented

Crédit Mutuel Arkéa also checks that the procedures regarding gifts and invitations are properly followed and that employees are regularly informed on this subject.

The results of these checks shall be communicated to the governing bodies of Crédit Mutuel Arkéa.
