

Prevention and management of conflicts of interest 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 guaranteeing independence in decision-making.

A framework for the prevention and management of conflicts of interest

Crédit Mutuel Arkéa has put in place a framework for the prevention and management of conflict of interest situations which sets out the rules applicable within the group regarding the identification, prevention and management of real, potential, apparent or perceived conflicts of interest. This arrangement is approved by the Board of Directors of Crédit Mutuel Arkéa.

Concept of conflict of interest

By conflict of interest is understood any professional situation in which the discretion or decision-making power of a person, a company or an organization may be influenced or impaired, in its independence or integrity, by personal considerations or by a power of pressure emanating from a third party.

The system also covers any situation which arises when the independent, impartial and objective performance of a person's duties is liable to be influenced by another interest, public or private, distinct from that which he must defend in those duties.

A conflict of interest may be related to the non-observance of one of the following principles:

- the primacy of the client's interests (commercial pressure, financial incentive, advantage, possibility of financial gain or avoiding a financial loss at the client's expense, interest in the result of a service provided, of a transaction carried out...);
- fairness in the treatment of clients (privileged treatment of a client);
- the separation of activities (insufficient separation between certain activities within an entity or between group entities likely to facilitate the dissemination of confidential or privileged information);
- the independence of functions (inappropriate influence resulting in depriving the person concerned of their freedom of judgment).

Identification of conflicts of interest

Any actual, potential, perceived or apparent conflict of interest shall be promptly brought to the attention of the compliance verification officer.

1. The management bodies of Crédit Mutuel Arkéa are involved in preventing and managing conflicts of interest.
2. Crédit Mutuel Arkéa has clear policies in place that define conflicts of interest and expectations regarding integrity and transparency.
3. Training and awareness sessions are regularly organized on conflicts of interest to strengthen the understanding of all members of the organization.
4. Crédit Mutuel Arkéa has deployed a dedicated conflict of interest declaration form, accessible to all employees on the group's intranet
5. Crédit Mutuel Arkéa has implemented a continuous monitoring process to identify potential new conflicts of interest that may arise over time, particularly when new members arrive or during changes in roles within the organization.

Prevention and management of conflicts of interest

Measures to prevent situations of conflicts of interest are implemented, notably by applying:

- rules of good conduct, internal regulations;
- the principle of separating activities and operations with regard to the exposed activities;
- decision-making mechanisms ensuring that decisions are made in the interest of the organization and its stakeholders within Group procedures;
- of a framework governing exposure to insider information.

Each case is treated individually. However, standard prevention and management measures may address certain situations:

- commitment of ethics of the employee/manager in a conflict of interest situation to act honestly and loyally;
- abstention during a vote;
- implementation of the four-eye rule;
- limitation of the possibility to sign a mandate;
- partitioning of committees.

Each case is the subject of a specific recording in a conflict of interest register kept by the Compliance Verification function.

Monitoring the implementation of the framework for preventing and managing conflicts of interests

The system governing the prevention and management of conflicts of interest at Crédit Mutuel Arkéa is subject to the internal control system of the Crédit Mutuel Arkéa Group defined in the internal control charter, and as such is subject to ongoing and periodic checks.
