

The whistleblowing system at Crédit Mutuel Arkéa

One ambition, to inspire confidence

To achieve this, rules of good conduct must be observed,
in particular those set out in
The Crédit Mutuel Arkéa Code of Conduct.

How ?

By encouraging the reporting of incidents within the framework of the whistleblowing system.

What is the right to report professional misconduct ?

The right to raise concerns is a faculty given to everyone to express themselves when they believe they have good reasons to consider that an instruction received, an operation under study or more generally a particular situation does not comply with the rules governing the conduct of Crédit Mutuel Arkéa's activities..

The whistleblowing system thus allows the employees of Crédit Mutuel Arkéa as well as any person covered by the regulations in force (job candidate, former employee, director, shareholder and partner, external and occasional employee, co-contractor, subcontractors) to report, anonymously or

not, information concerning, for example, a crime or misdemeanour, a threat or damage to the general interest, a violation or an attempt to conceal a violation of applicable and binding law (laws, regulations, ...) or a breach of the Crédit Mutuel Arkéa Code of Conduct. This arrangement is approved by the Board of Directors of Crédit Mutuel Arkéa.

The exercise of the professional whistleblowing right being an effective means of contributing to the control of the risk of non-compliance and combating corruption within Crédit Mutuel Arkea, the employees of Crédit Mutuel Arkéa are regularly made aware of the rules of deontology and professional ethics through training or communications relating in particular to this device.

What protective measures ?

In line with the provisions of law n°2016-1691 of December 9, 2016, known as the SAPIN II law, the whistleblower benefits from a protection regime if he reports or discloses information in good faith and without direct financial compensation. The whistleblower benefits in particular from protections against retaliation measures, from a civil liability exemption for damages that may result from his alert, and from a criminal liability exemption in case of concealment of confidential documents containing information related to his alert. (as soon as he has had lawful access to these documents).

The whistleblower's entourage also benefits from some of the protection measures granted to the whistleblower.

How to make a report ?

At Crédit Mutuel Arkéa, it is the compliance manager who is responsible for collecting and processing alerts.

You can send him a report, in your local language, confidentially, through the "Alert" tool, the secure platform of the publisher Whistleblower Software ApS accessible 24/7, via the "Compliance" section of the institutional site of Crédit Mutuel Arkea

The information you provide to them as part of the alert system must be factual and directly related to the subject of the alert. In addition, such information must not fall within the scope of national defence secrecy, medical secrecy, the confidentiality of judicial proceedings, the confidentiality of judicial inquiries or investigations, or the professional secrecy of lawyers.

Regardless of the report you send us, you can also make a report directly:

1. To one of the competent authorities within the scope of Crédit Mutuel Arkéa's activities: the AMF, the ACPR, the DGCCRF, the Competition Authority, the CNIL, the ANSSI, the AFA, the DGFIP, the DGDDI ;
2. To the defender of rights (also designated as the competent authority), who shall direct him/her to the authority or authorities best able to know them ;
3. To the judicial authority ;
4. To an EU institution, body, office or agency competent to gather information on violations falling within the scope of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019.

or make your report public under certain conditions (See article 8-III of the Sapin II law).

What action will be taken in response to the report ?

An acknowledgment of receipt will be sent to you as soon as we receive your report. Questions may then be asked in order to conduct the investigation appropriately. You will be kept informed of the progress of the processing of your report and the outcome of the investigation.

When the compliance officer is notified of an alert, he shall ensure enhanced confidentiality of all information communicated to him, both during its collection, processing, storage and communication.

All persons involved in the handling of a report are bound by a confidentiality agreement and will ensure that the report is handled with utmost care.

Controlled implementation

Crédit Mutuel Arkéa's professional whistleblowing system is subject to the internal control system of the Crédit Mutuel Arkéa Group defined in its internal control charter, and is therefore subject to ongoing and periodic checks.
