

Summary of the Compliance Charter of Crédit Mutuel Arkéa

A vision

In a context of increasing regulatory requirements and expectations from society, our group has chosen to anchor, over the long term, **its social and environmental responsibility into the heart of its businesses, its product and service offerings, and its practices.**

In a process initiated in 2019 with the definition of its **Raison d'Etre**, the group continued its action with the official adoption in 2022 of the status of **mission-driven company**, which constitutes in the 2019 Pacte law the most demanding level of commitment in terms of environmental and societal responsibility.

The **compliance verification function contributes to the respect of these commitments**, especially through the dissemination of knowledge and understanding by all employees, leaders or directors of the group, of good practices, concrete translations of the values inscribed at the heart of this Raison d'Etre.

It actively promotes, especially through the implementation of its compliance measures, ethical, supportive and inclusive behaviours, which are essential conditions for establishing a lasting relationship of trust with all clients, from precursors to the most fragile.

Area

In order to ensure homogeneity of practices within the group, the Compliance and Permanent Control Department (CPCD) coordinates the implementation of compliance measures, notably through the development of common rules, procedures and tools.

The procedural framework built by the CPCD evolves according to the new risks identified and the activities of the group entities.

It is organized around **4 major axes** :

- Financial Security including the fight against money laundering and terrorist financing, market integrity and the treatment of market abuse ;
- Deontology and Professional Ethics, including the prevention and management of conflicts of interest, the right of alert, the fight against corruption and influence peddling ;
- Protection of the interests of clients including notably the protection of personal data ;
- Tax Transparency which aims to strengthen cooperation between States in order to limit capital flight (FATCA, CRS, DAC 6).

An organization

The person responsible for compliance verification for the group is the Director of the Compliance and Permanent Control Department (CPCD), himself attached to the Deputy Managing Director in charge of the Support Division for the Development of Crédit Mutuel Arkéa.

Responsible for the organization, coordination and control of compliance measures for the group, he relies, to accomplish his mission, on multidisciplinary teams that manage and animate the different compliance themes at the central level.

It leads a group-wide network of compliance officers who are attached to it through a **"strengthened functional link"**.

Reporting directly to the executive management of their entity, the heads of compliance verification for group entities ensure the consistency and effectiveness of the compliance arrangements in their entity and may be assisted by collaborators to accomplish their mission.

This functional organization implemented within the group aims to strengthen business expertise as closely as possible to the activity and to empower each entity manager on their scope of responsibility.

Furthermore, the employees and the operational management of the subsidiaries carry out their activities in compliance with the applicable regulations and the directives issued by the group.

Each employee of the group is indeed an actor in the process and contributes through their actions to controlling the risk of non-compliance. **Compliance is everyone's business.**

The Compliance Charter defines the fundamental principles, responsibilities and roles for compliance verification within the group.

Applicable to all group entities (Crédit Mutuel Arkéa and subsidiaries), it defines the measures to be put in place to prevent and control the risk of non-compliance and frames their implementation within the group.

Ambitions

Support all stakeholders

The compliance verification function supports, raises awareness and acts as **an advisor** both with governance bodies and business operations to ensure the protection of all.

Each stakeholder in the company contributes to the continuous improvement of the compliance system.

Implementing the compliance culture

The good practices of **all employees**, and not only those of a group of experts, contribute to the robustness and effectiveness of the compliance system.

The compliance function promotes and strengthens the "compliance culture" within entities.

Objective :

- make known the compliance measures, their role, their objective and their usefulness,
- raise awareness among employees about the need to continuously improve customer satisfaction,
- raise employees' awareness of the stakes, risks and regulatory issues,
- update the knowledge of employees as regulatory developments evolve.

Awareness-raising actions are carried out among employees, thus contributing to the strengthening of a common culture of compliance, which creates value and cohesion within the group.

The anchoring of compliance culture is based on widespread dissemination and awareness among all employees (compliance sector, business lines and particularly the sales force) and stakeholders in the company.

Being at the heart of the company's activities

The compliance verification function works closely with the support functions and business operations of the entities (risks, internal control, sales functions, marketing, legal functions...) to ensure an optimal level of **information** and responsiveness in **decision-making**.

The compliance verification function is kept informed of any changes that impact in particular the company's risk profile resulting from significant events (evolution of activity, reorganization, acquisition of a company, change of information system...) and any breach of regulatory obligations.

One mission

In order to protect the group from any risk of non-compliance, the compliance verification function permanently integrates its action into a **security** approach aimed at protecting the interests of clients, helping the group to adapt to changes in the economy and society, while preserving its **integrity** and **reputation**.

The effective managers and the supervisory body must at all times be able to have a **clear and precise view of the risks** of non-compliance to which the entity is exposed in order to be able to quickly prioritize the risks incurred and ensure that the compliance risk control measures implemented are effective and prevent malfunctions.

The compliance verification function identifies and assesses non-compliance risks including corruption risks and integrates them into a **mapping** that must be continuously maintained.

The compliance risk control system, which consists of all the measures put in place to prevent compliance risks and limit their impacts or occurrence, is based at the group level on a **corpus of rules, coordination of actions**, prevention and detection **tools** as well as an **awareness** device.

The compliance verification function ensures the implementation of **remediation actions** for potential malfunctions identified in the implementation of compliance obligations.

Particular attention is also paid to compliance with the rules applicable in competition law when working with professional associations.

The compliance function has formalized its mission as :

"give confidence in our company, our products and our actions to our customers, our employees, our leaders and our supervisory authorities."
