



Whistleblower Device

Practical Guide for Whistleblowers

February 2023



CRÉDIT AGRICOLE S.A.



Who can submit an alert?

All employees of the Group's entities, job applicants, former employees, shareholders, partners, members of the board, general management or supervisory board, as well as external and occasional employees, subcontractors and suppliers.

What are the facts targeted?

The following facts may be the subject of an alert:

- A crime or an offense
- A threat or harm to the public interest
- A violation or an attempt to conceal a violation of international law, European Union law, the law or regulations,



Exclusions: cases covered by national defence secrecy, medical secrecy or attorney-client privilege, the secrecy of judicial deliberations and the secrecy of the judicial inquiry or investigation is not included in the protection provided by law.

When and how to exercise the alert right?

Regarding Group employees, 2 reporting channels are possible:

1. The employee forwards his report to his Line Manager, his Human Resources Department or his Compliance Department, who acknowledges receipt within a maximum of 7 days and who examines the admissibility of the alert and, if necessary, directs the employee to the Group whistleblower system, or transmits the alert to the entity's Whistleblower Referent.
2. The employee submits his report directly via the whistleblower group tool

The Whistleblower Group tool is accessible 24 hours a day, 7 days a week from a single link via a personal or professional computer:

<https://www.bkms-system.com/Groupe-Credit-Agricole/alertes-ethiques>

The tool then guarantees the confidentiality of the author of the report, the facts contained in the file and the persons concerned. It is available in 11 languages.

The whistleblower is advised to give his identity in order to benefit from the protection which is his responsibility. However, he can also choose to remain anonymous.

In both cases, **it is essential to subscribe to the secure dialog box** in order to be able to exchange with the person in charge of processing the alert. This information exchange system is not based on standard messaging. The information communicated, including personal information, is encrypted and does not leave the independent secure system.

Who handles the alert and how quickly?



The entity's "whistleblower" referent, as well as the persons designated to handle alerts (generally belonging to Compliance), process the alerts thus revealed and share them only with those stakeholders whose involvement is absolutely necessary for the processing of the alert. To this end, each person in charge of handling alerts signs a "Confidentiality Commitment".

Special case: if the person concerned by the alert is the entity's "whistleblower" referent or one of the persons designated to handle alerts, you must then escalate it to level N+1, i.e. to the holding company (1) or the Crédit Agricole Group (2).

The whistleblower is informed via the secure box (**by regularly logging on to BKMS**):

- ✓ Of the correct receipt of its alert and the estimated time for its examination (confirmation of reception sent within 7 working days).
- ✓ the admissibility of the alert and the estimated time for its examination (reasonable time estimated at 3 months)
- ✓ Of the alert processing status.
- ✓ Of the end of the investigation and the alert closure.

Which guarantees for the whistleblower?



- The identity of the whistleblower and of the persons concerned by the alert, as well as the information collected by all recipients of the alert, shall be treated as strictly confidential.
- At the end of the processing of the file, the data relating to the alert will be archived after anonymisation.
- The whistleblower is not criminally liable if he/she has acted in good faith, without direct financial compensation concerning facts he/she has personal knowledge (if the information was obtained outside the scope of professional activity). In this case, the whistleblower may not be sanctioned, dismissed or subjected to any direct or indirect discriminatory measure.

(1) To the question « please specify the exact name of the entity where the incident occur » answer « not specified » or « unknown »

(2) To the question « in which main entity/group of entities/holding did the incident occur » answer « not specify » or « unknown »