



# Anti-corruption policy

## INTRODUCTION

Corruption and influence peddling are a major factor in the unequal distribution of wealth, an obstacle to economic development and a threat to the political and social stability of States. They are universally recognized as serious offences.

This policy describes the commitments of Crédit Mutuel Alliance Fédérale in terms of measures to combat corruption and influence peddling, and is in addition to other existing financial security measures within the bank. It aims to achieve compliance with regulatory obligations in order to protect managers, employees and the Group entities concerned from the risks to which they may be exposed in their activities.

Regulations in France, which were significantly strengthened with the entry into force of the Sapin II Act in 2017, organise the steps to be taken to prevent, detect and manage the risks of corruption and influence peddling. That strict framework is particularly supplemented by the recommendations and guidelines issued by the French Anti-Corruption Agency (AFA).

The measures described in this policy apply to all Group entities, subject to compliance with the laws and regulations specific to each activity and each country of location. They may be reviewed from time to time when the Group deems it necessary.

For effective implementation, the Management of the Group relies on all its elected representatives and employees. Central and local compliance departments are responsible for supervising the various measures that accompany the policy.

## GROUP PROFESSIONAL ETHICS

Crédit Mutuel is a cooperative and mutualist banking group that owes its reputation and development to the values of freedom, solidarity and responsibility. It belongs to its member customers, and builds long-standing relationships with them based on mutual trust, openness and the protection of the legitimate interests of both parties.

Professional ethics form a fundamental value of our Group and apply to all employees and elected officials in the conduct of their daily activities. In that respect, measures against corruption and influence peddling are an integral part of the professional ethics and compliance system of the Group.

This anti-corruption policy applies to all entities and to all Group employees and elected officials, both in France and abroad. Customers and partners of the Group – suppliers, service providers or intermediaries – are expected to submit to the same level of requirements.

## **UNCOMPROMISING POLICY OF THE GROUP**

Crédit Mutuel does not accept any form of corruption or influence peddling.

Crédit Mutuel requires unimpeachable behaviour that reinforces the trust of customers, employees and partners.

Crédit Mutuel asks its employees to be uncompromising in matters of corruption and influence peddling, whether active or passive, external or internal, private or public.

It expects them to follow the established rules in their work, defend the interests of customers and those of the Group and be attentive to incentives that may be related to corruption or influence peddling.

In that context, they are asked to report to their line managers or to the Compliance Department any suspicion of corruption involving an employee, client or partner and any potential conflict of interest that may be detected in the course of their professional activities.

No employee may take part in corruption or influence peddling. Any act of corruption or noncompliance with this policy shall be sanctioned in accordance with the provisions of company regulations.

Further, the partners of the Group are similarly expected to demonstrate integrity. Any participation in corruption by a partner could lead to the immediate termination of the business relationship.

## **GOVERNANCE AND IMPLEMENTATION OF THE SYSTEM**

The management bodies of the Group are accountable for the implementation and supervision of the anti-corruption programme to its stakeholders (employees, suppliers, customers, public authorities, etc.).

They thus create the conditions for effective governance of anti-corruption compliance by undertaking to set up an anti-corruption programme, promoting and disseminating a culture of corruption prevention, mobilising appropriate resources, defining the conditions for organising the compliance function, ensuring the deployment of this programme and ensuring compliance with the anticorruption commitments of the Group.

In accordance with best practices recognised by the AFA, the head of the compliance department is responsible for leading the deployment, implementation, evaluation and updating of the anticorruption compliance programme, in close cooperation with the various concerned functions within the organisation.

The mechanism thus makes it possible to coordinate measures against corruption with other related areas, which include measures against money laundering and terrorist financing, measures against fraud, export controls and compliance with international sanctions, prevention of market abuse and prevention of conflicts of interest.

## **ANTI-CORRUPTION MEASURES IN FORCE WITHIN THE GROUP**

Each Group entity in France and elsewhere deploys a plan to detect and prevent corruption and influence peddling based on a set of internal procedures and specific actions:

- Mapping of the risks of corruption and conflicts of interest
- Set of rules relating to ethics and good conduct,
- Training of staff in good business practices and measures against corruption and influence peddling,
- Reporting of gifts and benefits received or offered,
- Internal alert system dedicated to employees,
- System for handling customer complaints,
- Implementation of the anti-corruption compliance program.

The commitment of the Group to combatting corruption primarily enables it to strengthen its relationships of trust with its employees, customers and partners.