

Anti-Corruption Policy

INTRODUCTION

Corruption and influence peddling¹ are major factors in the unequal distribution of wealth, obstacles to economic development, and threats to the political and social stability of States. They are universally recognised as serious offences.

The policy describes the commitments of Crédit Mutuel Alliance Fédérale in combating corruption and influence peddling and complements the existing frameworks designed to ensure financial security within the bank. These measures ensure compliance with regulatory obligations and protect executives, employees, and Crédit Mutuel Alliance Fédérale entities from the risks they may face in their activities.

Regulations in France were significantly strengthened with the entry into force of the Sapin II Act in 2017 and structure the actions to be implemented to prevent, detect, and manage risks related to corruption and influence peddling. This strict framework is further supported by the recommendations and guidelines issued by the French Anti-Corruption Agency (AFA).

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

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

THE PROFESSIONAL ETHICS OF CRÉDIT MUTUEL ALLIANCE FÉDÉRALE

Crédit Mutuel Alliance Fédérale 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 members-clients and builds long-standing relationships with them based on mutual trust, transparency, and respect for the legitimate interests of both parties.

Professional ethics are a fundamental value of Crédit Mutuel Alliance Fédérale and apply to all employees and elected officials in the conduct of their daily activities. In this respect, the fight against corruption and influence peddling is an integral part of the professional ethics and compliance system of Crédit Mutuel Alliance Fédérale.

This anti-corruption policy applies to all entities and to all Crédit Mutuel Alliance Fédérale employees and elected officials, both in France and abroad. Customers and partners of Crédit Mutuel Alliance

¹ i.e. improper use of influence

Fédérale – suppliers, service providers, or intermediaries – are expected to comply with the same level of requirements.

UNCOMPROMISING POLICY OF THE GROUP

Crédit Mutuel Alliance Fédérale does not accept any form of corruption, influence peddling, or facilitation payments.

As a reminder, **corruption** refers to an illegal practice consisting of using or abusing a position—public or private—in order to perform, delay, or omit to perform an act that falls directly or indirectly within the scope of one’s duties, for the purpose of obtaining advantages or undue benefits, and for the recipient to obtain any form of compensation in exchange. There are two forms of corruption:

Passive corruption, which is the act of the corrupted person, whether he or she solicits or accepts an undue advantage; and active corruption, which is the act of the corrupter, whether he or she offers or grants an undue advantage.

Influence peddling applies to a relationship in which a person with real or perceived influence over others exchanges that influence for an advantage provided by a third party who wishes to benefit from it.

Unlike corruption, which involves a relationship between the corrupted party and the corrupter, influence peddling involves a three-party relationship.

Like corruption, the law punishes both passive influence peddling (where a person abuses their real or perceived influence) and active influence peddling (where a person offers an advantage or yields to solicitations of a public official).

Facilitation payments constitute a corruption offence. These are payments made by an individual to a public official in order to obtain, facilitate, or expedite a routine administrative procedure that the individual is legitimately entitled to expect. They are sometimes referred to as “accelerator money” or “grease payments”.

Crédit Mutuel Alliance Fédérale:

- requires unimpeachable behaviour that reinforces the trust of customers, employees, and partners;
- asks its employees to be uncompromising in matters of corruption and influence peddling, whether active or passive, external or internal, private or public;
- expects its employees to follow the established rules in their work, to defend the interests of customers and those of Crédit Mutuel Alliance Fédérale, and to remain vigilant regarding any situations that may involve corruption or influence peddling.

In this context, employees are required to report to their line managers or to the Compliance Department any suspicion of corruption involving an employee, client, or partner, as well as any potential conflict of interest detected in the course of their professional activities. Such reports will give rise to an internal investigation.

No employee may take part in corruption or influence peddling. Any act of corruption or non-compliance with this policy shall be sanctioned in accordance with the provisions of internal regulations and appendices. Depending on the seriousness of the offence, sanctions may range from a written warning or reprimand to dismissal.

Furthermore, partners of Crédit Mutuel Alliance Fédérale are expected to demonstrate integrity under the same conditions. Participation by a partner in an act of corruption may result in the immediate termination of the business relationship.

GOVERNANCE AND IMPLEMENTATION OF THE SYSTEM

The management bodies of Crédit Mutuel Alliance Fédérale are responsible for the implementation and supervision of the anti-corruption programme with respect to its stakeholders (employees, suppliers, customers, public authorities, etc.).

They ensure effective governance by committing to establish an anti-corruption programme, promote and disseminate a culture of corruption prevention, allocate appropriate resources, define the organisation of the compliance function, ensure the deployment of this programme, and ensure compliance with the Group's anti-corruption commitments.

In accordance with best practices recognised by the AFA, the Head of Compliance is responsible for leading the deployment, implementation, evaluation, and updating of the anti-corruption compliance programme, in close cooperation with the various relevant functions within the organisation.

The framework enables coordination between anti-corruption efforts and other related areas, including anti-money laundering and counter-terrorist financing, fraud prevention, export controls and compliance with international sanctions, market abuse prevention, and conflict of interest management.

ANTI-CORRUPTION MEASURES IN FORCE WITHIN THE GROUP

Each entity of Crédit Mutuel Alliance Fédérale in France and abroad implements 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;
- A set of rules relating to ethics and good conduct (including internal regulations and an anti-corruption manual -for internal use – aimed at raising employee awareness of appropriate conduct in situations involving corruption);
- Training of staff in good business practices and measures against corruption and influence peddling;
- Reporting of gifts and benefits received or offered. Under existing procedures, employees are required to declare any gifts received to their management via a dedicated internal tool or by submitting a form by email;
- An internal whistleblowing system available to employees and external stakeholders. This system allows individuals to report serious misconduct, including corruption, to the Compliance function in strict confidence. The employee benefits from whistleblower status and is protected from any sanction, reprisal, or discriminatory measure when the report is made in good faith;
- A system for handling customer complaints;
- A third-party assessment system (customers, suppliers, partners, intermediaries), based on a risk-based approach;

- Internal controls and assessments to ensure the proper implementation and effectiveness of the framework;
- Oversight by the Compliance function at both Group and entity levels, including policy implementation, coordination of investigations in case of suspicion, regulatory monitoring, and cooperation with relevant functions (audit, internal control, legal);
- Implementation of the anti-corruption compliance programme.

The commitment of Crédit Mutuel Alliance Fédérale to combating corruption strengthens its relationships of trust with its employees, customers, and partners