



Summary of BNP Paribas's Whistleblowing framework (on 10 June 2024)

The BNP Paribas Whistleblowing (WB) framework is governed by a Group-level procedure in accordance with the French Sapin II law on “transparency, the fight against corruption and the modernization of the economy” and applies to all Group entities in compliance with local regulations.

Every Group employee has the right to alert in the event of a crime or offence, or threat or harm to the public interest, or a violation or an attempt to conceal a violation of an international norm ratified by France, of a unilateral act of an international organization adopted on the basis of such norm, or of European Union law or any law or regulation, or a breach of the Group Code of Conduct. This right must be exercised in good faith and without direct financial consideration.

The Group's Whistleblowing framework, in accordance with the Wasserman law, is also open to external third parties, in particular to former Group employees, and to suppliers and subcontractors, for reporting information obtained in the context of work-related activities in the Group.

Issues that can be reported through whistleblowing include, but are not limited to:

- Acts of corruption and influence peddling or any other infringement pertaining to probity
- Acts of fraud
- Professional behavior contrary to the provisions relating to “Respect for persons” (sexual and moral harassment, discrimination, physical aggression, violence, sexist behaviour)
- Infringement of professional ethics rules
- Infringement of financial security rules
- Anti-competitive practices
- Breach of market integrity
- Infringement of the rules for the protection of interests of clients
- Unauthorized communication of confidential information, or theft or leakage of data
- Violation of human rights and fundamental freedoms, or damage to the health and safety of persons or to the environment committed by a Group Entity, or by one of its suppliers or a subcontractor of a supplier, within the framework of an established business relationship with the Group or one of its Entities
- A serious violation of BNP Paribas policies regarding suppliers
- A serious violation of BNP Paribas policies regarding the use of social media

The Group Whistleblowing procedural framework presents the different Whistleblowing Channels available to employees and external third parties, the conditions to be met when raising an alert, the rules for processing an alert and the protection granted to Whistleblowers against any retaliation.

The Group Whistleblowing framework relies on the following pillars:

1- Independent and protected communication channels open to employees and external third parties

Compliance and Group Human Resources share responsibility for the BNPP Whistleblowing framework according to the nature of the alert:

- Human Resources receive and process alerts relating to respect for people,
- Compliance receives and processes other types of alerts.



Employees and External third parties can raise an alert securely via an external system ([BNP Paribas Whistleblowing Platform](#)) available 24/7 and operated by an external provider through an online form or a dedicated hotline¹).

Employees wishing to report an alert can also approach their management, human resources or Compliance.

In addition, there is a specific communication channel for alerts on breaches of financial sanctions and embargoes.

Each Whistleblowing channel is under the responsibility of Referents² who are committed to respecting the confidentiality rules and ensuring an impartial and independent handling of each alert.

The methods for raising and handling an alert comply with local rules.

An alert may be expressed in all the languages used by the Group.

Whistleblowing reports are systematically processed with confidentiality. Anonymous reports are processed unless this is not authorized by local regulations.

2- Protection of Whistleblowers and Confidentiality

No employee who raised an alert in good faith may be disciplined, dismissed or discriminated against, directly or indirectly, with regard notably to recruitment, remuneration, promotion, training, assignment or redeployment. The same protection applies to employees having borne witness to the case and having provided information for the investigation.

The Whistleblowing framework guarantees the confidentiality of the identity of the Whistleblowers and any persons mentioned, including the targeted person(s), and of the information collected in the report and during the investigation.

The Referents are responsible for implementing these rules and for complying with applicable laws and regulations regarding the processing, storage and retention of personal data collected in a Whistleblowing report.

3- Processing of Whistleblowing reports

The processing of Whistleblowing reports is governed by procedures or collective agreements that define each step for handling reports and specify special rules on protection and confidentiality.

As soon as an alert is deemed admissible, an investigation is carried out independently with the required expertise. A specific timeframe has to be applied for processing Whistleblowing cases and informing the Whistleblower at each step of the process (acknowledgement of receipt, confirmation of admissibility and closure after investigation), unless there is a legitimate impediment linked to the anonymity of the alert.

4- Employees' awareness

All Group employees are made aware of the Code of conduct and of the Whistleblowing framework in the mandatory "Conduct Journey" training.

This framework and the methods for using it are also communicated at central, regional and local levels of the Group's organization, in particular on intranet sites.

¹ Depending on the country due to local specificities/regulations

² HR Conduct Referent – "Respect for persons" or Compliance Whistleblowing Referents according to the topics.



5- Controls

The Whistleblowing framework is subject to generic control plans designed to check the access to Whistleblowing channels and to ensure that the rules for processing whistleblowing alerts are respected.

6- Reporting to the General Management and Board of Directors

A comprehensive and detailed reporting on the quantitative and qualitative analysis of alerts (i.e. number of alerts and remedial measures) is produced quarterly and presented at least annually to the Group Executive Committee and to the Board of Directors of BNP Paribas SA.

Of the 333 alerts raised in 2023, 78 % were closed, 28 % of which proved to be founded and gave rise to action plans and/or disciplinary proceedings (*figures as of January 2024*).

END OF THE DOCUMENT

Previous versions:

16 December 2021

27 April 2022

3 June 2022

17 May 2024