



Summary of BNP Paribas's Internal Whistleblowing framework

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The BNP Paribas Whistleblowing (WB) framework is framed by the Group WB procedure, which draws in particular on the French Sapin II law on “transparency, the fight against corruption and the modernization of the economy”, and applies to all BNP Paribas entities.

Using the WB framework is a right for Employees, who can use it for reporting in good faith, suspected or observed Crime or offence, or threat, or serious harm for the general interest, or obvious and serious violation of an international norm, or a unilateral act of an international organization carried out on the basis of such norm, or a law or regulations, or a breach to the Group Code of conduct, or to a Group policy or procedure or a behavior not in the spirit of the Code of conduct.

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,
- Inappropriate professional behavior or lack of respect for persons, diversity, and equal opportunity
- Infringement of the rules of professional ethics
- Infringement of the rules of financial security}
- Anti-competitive practices
- Breach of market integrity
- Infringement of the rules for the protection of interests of clients - Unauthorized communication of confidential information, theft or leakage of data
- Violation of human rights and fundamental freedoms, damage to the health and safety of persons or to the environment.

The Group WB procedure presents notably the protection rules, the modalities available to internal staff and external employees for raising a report through an internal WB channel, and the main steps and associated timeframe for processing the WB reports

The Group WB framework relies on the following pillars:

1- Internal independent and protected channels open to Employees

The Group WB framework is under the responsibility of the Compliance Function, which is a second level control function, an independent and hierarchically integrated function of the BNP Paribas Group.

Employees have the choice to send a report in one of the group internal WB channels: the Territories or local Business Lines WB channels, where Employees can raise a report in the local language, or in the Group or Corporate Business Lines or Regional (Americas, APAC) WB channels, that Employees can use should they prefer to raise their concern outside their local entity.

A specific channel - the Group “Sanctions and Embargoes” channel, operated by Heads of Compliance Group Financial Security- is dedicated to collecting reports relating to violations of financial sanctions and embargoes.

Each WB channel is under the responsibility of formally appointed Whistleblowing Referents (“WB Referents”), who are all part of the Compliance Function, and as a consequence independent from the



business lines. The WB Referents are committed to respect the WB confidentiality rules, and are in charge of handling the WB reports they receive in the channel they are appointed for.

Depending on the channels, Employees can raise a report by e-mail to a dedicated protected box mail (available 24/7), or through an external system (available 24/7, operated by an external provider, notably in the US and UK), or contact by call the WB referent or a dedicated external hotline (such as in the US and UK).

Any natural person, permanent Employee, temporary Staff and external Staff, is authorized to use the Group Whistleblowing framework. Reports sent by third parties in a WB Channel are processed according to the Group WB processing rules

WB reports are systematically processed with confidentiality and can be raised anonymously; anonymous reports are processed unless not authorized by local regulations.

2- Protection of Whistleblowers and Confidentiality

Using the Whistleblowing framework is a right for Employees. Accordingly, no Employee may be retaliated (ie: disciplined, discharged or discriminated against directly or indirectly with regard to recruitment, remuneration, promotion, training, assignment, or mobility) for having reported or testified to, in good faith.

The WB framework guarantees the confidentiality of the information collected.

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

3- Structured Processing of all WB reports

The processing of WB reports is framed in a dedicated Operating guide, which provides WB Referents precise guidance for processing WB cases and ensuring the respect of protection and confidentiality rules. As soon as an alert is deemed admissible, it is investigated by an independent expert. A specific timeframe has to be applied for processing the WB cases and informing the whistleblower at each step of the process (acknowledgement of receipt, confirmation of admissibility, and closure after investigation).

4- Employees' awareness

The Employees are trained on their duty to speak-up and on the WB framework in the "Conduct Journey" (mandatory training for all staff).

Communication to all staff on the WB framework is performed at Group, regional and local levels.

The WB framework, and modalities to raise a WB report, are displayed in a specific and easy to access intranet page, at Group and regional levels, and in each entity.

5- Controls

The WB framework is subject to generic control plans, including 1st-level controls, performed by Compliance, aiming at checking the access to the WB channels, and ensuring the respect of the confidentiality and processing rules, and 2nd-level controls, performed by an independent team, aiming at checking the implementation of the WB framework in all entities, and assessing the effectiveness and results of 1st-level controls.



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6- Reporting to General Management and Board of Directors

A detailed reporting is produced quarterly by the Group WB Referent, which covers all WB reports received group wide, based on the registration of all cases in a dedicated group tool. The reporting presents quantitative data and qualitative analysis. It is presented annually to the Compliance and Group Executive Committees and to the Board of Directors.

In 2021, 296 alerts have been raised through the WB channels. For 39% of them, the facts were substantiated and led to action plans and/or disciplinary proceedings. HR topics are the main allegations.

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