

Procedure name: <i>Whistleblowing Procedure</i>	1st implementation date: <i>2018</i>	Last update date: <i>June 2023</i>
Function: <i>Group Compliance</i>		Version: <i>3</i>

## WHISTLEBLOWING PROCEDURE

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Author:	Group Compliance Officer
Validated by:	Group Compliance Director
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### Versioning

Version	Approval date	Implementation date	Changes
<i>1.0</i>	<i>2018</i>	<i>2018</i>	<i>Procedure creation.</i>
<i>2.0</i>	<i>July 2019</i>	<i>July 2019</i>	<i>Procedure modifications.</i>
<i>3.0</i>	<i>June 2023</i>	<i>June 2023</i>	Modifications to include: <ul style="list-style-type: none"> <li>○ <i>Law n° 2022-401 of 21 March 2022, to improve whistleblowers protection, amending the law n°2016-1691 of 9 December 2016;</i></li> <li>○ <i>Decree n°2022-1284 of 3 October 2022, on the procedures for collecting and processing whistleblower alerts and establishing the list of external authorities.</i></li> </ul>

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## 1. INTRODUCTION

As a regulated company, Compagnie Française d'Assurance pour le Commerce Extérieur ("Coface") is committed to operate ethically and in compliance with applicable laws/regulations. Coface promotes probity, integrity standards to prevent any incidents or suspected incidents and protect those who report misconduct in the course of their activities.

Coface and its branches/subsidiaries (called hereinafter "Coface Group") impose that Group's entities apply the same level of whistleblowing processes and protection.

This document was presented to the Workers' councils and should be read in conjunction with the other Coface codes of conduct and guidelines, including the Code of Conduct and the Anti-bribery Code.

### 1.1. Scope and objectives

1.1.1 The Whistleblowing Procedure relates to the reporting of suspected or presumed incidents, by a natural person (hereinafter "the whistleblower"), in good faith and without direct financial compensation, about a potential or current breach of the law, to the Coface Code of Conduct and/or a threat or a prejudice to the general interest<sup>1</sup> (hereinafter "whistleblowing").

1.1.2 Whistleblowing can concern but is not limited to fraud, corruption, money laundering, terrorism financing, breach of international sanctions, inappropriate use of company resources, conflict of interests, insider trading, infractions to competition and antitrust laws, infringement of personal data protection laws or inappropriate conduct in regards to Coface legal duties towards its clients and/or employees.

1.1.3 The purpose of the Whistleblowing Procedure is for whistleblowing to be raised safely within Coface Group and to be handled adequately, so that suitable measures may be taken in a timely fashion. It describes the relevant principles and guidelines for reporting and handling suspected or presumed incidents.

### 1.2. Laws and regulations

1.2.1 French and European regulations require Coface to set up an internal whistleblowing reporting mechanism and implement an efficient framework to encourage whistleblowing.

1.2.2 As a principle, if local regulatory or legislative requirements conflict with or exceed the requirements set out in this procedure, any local variance or derogation

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<sup>1</sup> Article 6.1 of the law of the 9 December 2016 amended by the law of the 21 March 2022 (called hereinafter "amended Sapin 2 law") accessible on: <https://www.legifrance.gouv.fr/loda/id/JORFTEXT000033558528/2023-02-16/>

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must be documented using the addendum template in Appendix I of this procedure, the higher standards will apply. Group Compliance is in charge to review and approve local addendum template.

### 1.3. Key principles

- 1.3.1 The basic principles of the Whistleblowing Procedure are as follows:
- Coface employees and third parties have a choice between a number of whistleblowing channels for reporting presumed or suspected incidents;
  - Coface employees and third parties acting in good faith must not, under any circumstances, be subject to retaliations for their reporting: they must be protected and their identities must insofar as possible remain confidential;
  - Suspected or presumed reported incidents must be verified in the appropriate manner and, if they are confirmed, Coface must take all necessary steps to identify appropriate remedies;
  - The basic rights of any person implicated by the suspected or presumed reported incidents must be respected, whilst ensuring that the whistleblowing reporting process is effective.

## 2. WHO CAN REPORT

2.1.1 The whistleblowing reporting process described in this procedure is accessible to all persons whose relationship with Coface falls or has fallen within a professional framework<sup>2</sup>. Therefore, it may be used by all Coface employees (incl. Trainee, contractor, and subcontractor etc.), directors, managers, officers and executives in all Coface Group<sup>3</sup> (called hereinafter “Coface employees”).

2.1.2 It may also be used by any external person who entered in any form of professional relationship with Coface<sup>4</sup> (called hereinafter “Coface third parties”). This also includes, but is not limited to customers, intermediaries, suppliers and their employees, potential new joiners, former employees etc.

2.1.3 Anyone willing to report who has personal knowledge of the presumed or suspected incident is encouraged to do so, even though the information was not obtained in the course of their professional activities<sup>5</sup>.

2.1.4 Coface employees are encouraged to report any suspected or presumed incidents and are also required to cooperate in any official investigation, audit or similar request. No Coface employee may use their position to prevent another Coface employee from exercising their rights or complying with their obligations as

<sup>2</sup> Art. 7-11° of the amended Sapin 2 law.

<sup>3</sup> Art. 8.I.A. 1°, 2° and 3° of the amended Sapin 2 law.

<sup>4</sup> Art. 8.I.A. 4° and 5° of the amended Sapin 2 law.

<sup>5</sup> Art. 6.I and 7-11° of the amended Sapin 2 law.

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indicated above without facing potential disciplinary sanctions and criminal prosecutions<sup>6</sup>.

### 3. WHAT TO REPORT

#### 3.1. Situations to report

3.1.1 Coface employees and third parties have the possibility to report any suspected or presumed incidents qualifying as a whistleblowing. This includes, but is not limited to, any of the followings:

- Criminal or misdemeanor offences related to business (e.g. money laundering, terrorist financing, theft, fraud, bribery and corruption...);
- Human resources misconducts (harassment, bullying, discrimination in the workplace, endangerment of the health or safety of any person etc.);
- Others violations of Coface's Code of Conduct or other unethical conduct (breach of client confidentiality, deliberate concealment of irregularities etc.);
- Others breaches of law or regulations (e.g. data protection law infringement...).

3.1.2 The professional secrecy imposed on Coface employees and third parties is not applicable in the context of whistleblowing. However, no whistleblowing can lift the secrets of national defense, medical, judicial deliberations, judicial investigation or the lawyer-client privilege<sup>7</sup>.

#### 3.2. Information to disclose

3.2.1 Suspected or presumed incidents are to be described as accurately as possible. The information communicated must be factual and directly related to the subject of the alert. Coface employees or third parties must specify as clearly as possible the following elements:

- The circumstances in which the reported facts were discovered;
- All the information known about the reported facts;
- Any documents or other legally obtained evidences to support the allegations;
- The information necessary to contact them safely (when applicable).

3.2.2 Additional information or documents may be requested throughout the process to facilitate future investigations.

### 4. HOW TO REPORT

#### 4.1. Selection of the appropriate channel

4.1.1 Coface employees or third parties have at their disposal various channels to address their suspected or presumed incidents, depending on what they consider

<sup>6</sup> Art. 13.I. of the amended Sapin 2 law.

<sup>7</sup> Art. 6.II. of the amended Sapin 2 law.

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most appropriate. Coface employees or third parties are invited to contact only these different channels, for efficiency and confidentiality guarantees.

4.1.2 It is up to the Coface employee or third party to choose the most appropriate channel for reporting incidents. It is the responsibility of the Coface employee or third party not to disclose any information about the alert and its consequences outside of the reception channels below, except in the case of a legitimate interest, in order to guarantee its confidentiality and proper handling.

4.1.3 If the Coface employee first contacts their manager, direct or indirect, the latest must redirect them to the appropriate channel, in strict confidentiality, if the presumed or suspected incident is likely to be qualified as a whistleblowing. As part of their professional obligations, the manager is also committed not to disclose any information about the reporting apart from the appropriate channels defined below.

**A. Local, Regional and Group Reporting channels**  
**i. HR managers (for Coface employees only)**

4.1.4 All Coface employees can contact their designated HR point of contact to who they can address their suspected or presumed incidents. The HR manager may be reached verbally over the phone, in writing through email/post or physically at Coface premises<sup>8</sup>.

**ii. Compliance Officers (for Coface employees only)**

4.1.5 Such as HR managers, all Coface employees can contact their designated Compliance point of contact as specified in the orgchart available on WeConnect<sup>9</sup> to who they can address their suspected or presumed incidents. The Compliance Officer may be reached verbally over the phone, in writing through email/post or physically at Coface premises<sup>10</sup>.

**B. Online public channels**

4.1.6 Coface provides a form on its website that can be filled out by any employee or third party to address their suspected or presumed incidents. This form is accessible on the public website<sup>11</sup> at a minimum in English and French and if specifically required in the local language in accordance with applicable laws and regulations.

<sup>8</sup> Art. 10 of the decree n°2022-1284 accessible on:  
<https://www.legifrance.gouv.fr/loda/id/JORFTEXT000046357368/2023-02-16/>

<sup>9</sup> [Compliance \(coface.com\)](https://www.coface.com)

<sup>10</sup> Art. 10 of the decree n°2022-1284.

<sup>11</sup> Link to add.

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4.1.7 Moreover, the e-mail address [whistleblowing@coface.com](mailto:whistleblowing@coface.com) is also made available to Coface employees and third parties on the public website to address their concerns.

### C. The Ombudsperson

4.1.8 The Ombudsperson is a Coface employee in charge of collecting the suspected or presumed incidents and trying to solve the various situations, with the support of the other Coface competent departments. In this capacity, the Ombudsperson acts with complete independence, outside his own hierarchy. The Ombudsperson will treat the subject of the whistleblower in strict confidence, if the whistleblower so requests<sup>12</sup>. The Ombudsperson can be contacted verbally over the phone, in writing at the following email address: [ombuds@coface.com](mailto:ombuds@coface.com) or physically at Coface head office.

### D. External authorities

4.1.9 Concerns can also be raised by Coface employees or third parties directly to external authorities, such as the French Anti-corruption Agency (Agence Française Anti-corruption) or any other external authorities depending on the subject, as described in Appendix II.

## 4.2. Anonymous report

4.2.1 Coface employees and third parties can make in writing an anonymous alert if they prefer, as Coface would rather receive them than not having any concerns be reported at all.

4.2.2 A report is qualified as anonymous when the whistleblower has expressly refused to give their identity information (i.e by ticking the box “Yes, I would like to remain anonymous” in the form accessible on Coface public website) or when no identity has been given (i.e when a letter/email is received with no information on the sender).

4.2.3 However, Coface discourages this type of reporting for the following reasons:

- o Coface is firmly committed to protect whistleblowers under this procedure, which is why there should be no reason to file an anonymous whistleblowing report;
- o The subsequent investigations might be obstructed if the investigators cannot make contact with the individual raising the presumed or suspected incidents to obtain clarity or request further information;
- o In certain jurisdictions, Coface may be unable to investigate presumed or suspected incidents that have been reported anonymously;

<sup>12</sup> [Tout ce que vous devez savoir sur Ombudsperson \(coface.com\)](https://www.coface.com/fr/tout-ce-que-vous-devez-savoir-sur-ombudsperson)



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- o Coface employees or third parties' whistleblowing reported anonymously waive whistleblowers' right to information if no means of contact is provided: acknowledgement of receipt, feedback on the measures taken to manage the alert or information on the closure cannot be given<sup>13</sup>. In that regard, whistleblowers are strongly encouraged to provide contact for further exchanges (e-mail or postal address).

### 4.3. Collection modalities

4.3.1 For whistleblowing reported by Coface employee to an HR manager or a Compliance officer, the company undertakes to collect the information in the language used by the entity in which the whistleblowing is made or in English at a minimum.

4.3.2 In the case of whistleblowing by third parties using the Online Whistleblowing Form on Coface website or the generic mail address, Coface undertakes to collect whistleblowing report in all languages.

4.3.3 When reported to the Ombudsperson, Coface undertakes to collect the whistleblowing in English or French.

4.3.4 In order to ensure follow-up and accuracy, all verbal whistleblowing must be transcribed in writing by the first channel contacted. The whistleblower will have the opportunity to verify, correct and approve the transcription of the conversation<sup>14</sup>.

4.3.5 The whistleblower also has the possibility to verify and correct their alert when done in writing.

## 5. GOVERNANCE

### 5.1. Preliminary verifications

5.1.1 The modalities summarized below are described in details in the Whistleblowing Collection and Handling Standard Operating Procedure, to which the person in charge of the whistleblowing collection may refer.

5.1.2 The alert and the presumed or suspected incident must be treated with the utmost confidentiality by all the persons in charge or otherwise aware of what has been reported.

5.1.3 Each alert is assessed individually by the appropriate channel firstly contacted to determine if it relates to irregularities covered by this procedure and if the person who has raised the alert had the ability to do so.

<sup>13</sup> Art. 7-1 (4) of the amended Sapin 2 law.

<sup>14</sup> Art. 6.II. 3° of the decree n°2022-1284.

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5.1.4 If the conclusion of the preliminary verifications is positive - unless it would lead to compromising the confidentiality of the Coface employee or third party's identity<sup>15</sup> or if they have expressly waived this right (by not providing contact information)<sup>16</sup> - the Coface employee or third party who has raised the alert receives an acknowledgement of receipt within seven (7) working days of the alert<sup>17</sup>. The decision is documented in a whistleblowing register by the person in charge of the whistleblowing collection.

5.1.5 If preliminary verifications indicate that the concern has no basis, or it is not a matter to be pursued under this Procedure, it may be closed at this stage. Such a decision must be documented in a whistleblowing register by the person in charge of the whistleblowing collection and the person who has raised the alert is informed consequently. Such a notification must be sent within seven (7) working days of the alert, as it serves as an acknowledgment of receipt, and precises the closure of the case and its rational.

## 5.2. Handling and investigations

5.2.1 The handling of the alert depends on the channel of collection initially chosen by the whistleblower.

### A. Escalation to the Whistleblowing Forum

5.2.2 The whistleblower has initially contacted their HR manager, their Compliance Officer or a publicly available channel.

5.2.3 In this case, the first channel contacted escalates the case, whether it is closed after the preliminary verifications or not, to the Whistleblowing Forum.

5.2.4 The Whistleblowing Forum is composed of an expert team: the Group General Secretary and both the Group Compliance and Human Resources Directors, who has the right knowledge and objectivity to determine which specifically designated team/function will conduct future investigations.

5.2.5 The case is assigned to the most appropriate team/function to investigate depending on the matter it is about.

5.2.6 The specifically designated team/function in charge will conduct an investigation and determine the veracity of the alleged facts, based on concrete factual elements collected during these investigations. In that sense, the designated team/function will conduct interviews of Coface employees or third parties,

<sup>15</sup> Art. 10.I. of the decree n°2022-1284.

<sup>16</sup> Art. 7-1 (4) of amended Sapin 2 law

<sup>17</sup> Art. 10.I. of the decree n°2022-1284.

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witnesses or alleged authors and perform document reviews etc. The results and conclusions of the investigation must be formalized in a report which will be transmitted to the Whistleblowing Forum.

5.2.7 In case where the investigations conducted prove right the alleged facts reported, the Whistleblowing Forum determines collectively all necessary measures to correct the inappropriate practices (incl. consequence management) within a reasonable timeframe.

**B. Handling by the Ombudsperson**

5.2.8 When the whistleblower has initially contacted the Coface Ombudsperson, they determine which specifically designated team/function will conduct future investigations, in addition to those already conducted by the Ombudsperson.

5.2.9 The Ombudsperson and/or the specifically designated team/function in charge will conduct an investigation and determine the veracity of the alleged facts, based on concrete factual elements collected during these investigations. In that sense, the Ombudsperson and/or the designated team/function will conduct interviews of Coface employees or third parties, witnesses or alleged authors and perform document reviews etc. The results and conclusions of the investigation must be formalized in a report to the Ombudsperson.

5.2.10 In case where the investigations conducted prove right the alleged facts reported, the Ombudsperson determines – if need be – necessary remedial measures with the concerned Directors to correct the inappropriate practices (incl. consequence management) within a reasonable timeframe.

5.2.11 Investigations carried out by the Ombudsperson and/or by the specifically designated team/function as detailed above are only implemented with the prior agreement of the whistleblower and are carried out with the strictest respect for confidentiality, in particular with regard to the identity of the whistleblower at all stages of the procedure.

**5.3. Information of the whistleblower**

5.3.1 The whistleblower has a right to information throughout the management of its reporting. First, as mentioned above<sup>18</sup>, to provide comfort that Coface has received the alert on the suspected or presumed reported incident and is addressing it, the whistleblower receives an acknowledgement of receipt within seven (7) working days of the alert. The acknowledgement of receipt specifies the next steps and the expected timing to the whistleblower.

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<sup>18</sup> See paragraph 5.1.4 of the procedure.

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5.3.2 As a second step, Coface will provide a written feedback<sup>19</sup>, insofar as legally possible, to the whistleblower within three (3) months following the acknowledgement of receipt of the alert, or, if it happens in the meantime, at the case closure. This feedback includes information on the measures taken to assess the accuracy of the allegations, on the investigations' conclusions and, if applicable, on the measures taken to remedy the whistleblowing reported, as well as the justification for the measures taken<sup>20</sup>.

5.3.3 Finally, the whistleblower is informed in writing of the case closure whenever it happens.

#### **5.4. Information of the other targeted persons**

5.4.1 For the purpose of this procedure, the “other targeted persons” include all persons whose personal data are processed during the whistleblowing investigations (e.g. the alleged author, the witnesses, etc.)<sup>21</sup>.

5.4.2 In accordance with the law<sup>22</sup>, the other targeted persons must be informed about the allegations formalized by the whistleblower within a reasonable period of time, which does not exceed one month, as well as on how to exercise their rights of access and correction. However, such an information may be deferred<sup>23</sup> when it would seriously jeopardize the needs of the investigation (e.g. if there is a risk of destroying evidence and provided that confidentiality on identity of the whistleblower and details of the allegations must be protected at all times).

### **6. PROTECTIONS FOR WHISTLEBLOWERS<sup>24</sup>**

#### **6.1. Confidentiality and impartiality commitments**

6.1.1 Coface is committed to ensure that all alerts are received, escalated, processed and archived in an impartial and confidential manner.

6.1.2 Impartiality means that each situation will be handled without bias, in complete objectivity and by people who have no direct or indirect link with the situation reported to avoid conflict of interest situations.

<sup>19</sup> Art. 4.III. of the decree n°2022-1284.

<sup>20</sup> Art. 10-1.II. of the amended Sapin 2 law.

<sup>21</sup> [8.1 of the guidelines for the processing of personal data for the implementation of a professional alert system published on July 18<sup>th</sup> 2019, by the French Data privacy Regulator.](#)

<sup>22</sup> Art. 14 of the GDPR.

<sup>23</sup> Art. 14-5-b) of the GDPR.

<sup>24</sup> All the protections granted by Coface are extended to the facilitators, the individuals and the entities linked to the Coface employee or third party as part of their professional activities, as defined by the article 6-1 of the amended Sapin 2 law.

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6.1.3 Confidentiality is guaranteed first of all by the fact that the identity of the whistleblowers will be treated in confidence, from the whistleblowing receiving to the end of the data retention period. All Coface employees involved in the alert collection and handling process are trained<sup>25</sup> and personally committed to maintain strict confidentiality about the content of any whistleblowing, in accordance with applicable law.

6.1.4 Information about the whistleblower may only be disclosed with the express consent of the whistleblower<sup>26</sup> - unless information are disclosed to the judicial authorities - to authorized investigators to the extent necessary to carry out the investigations. Particular attention must be paid regarding the right of the persons implicated to be given a fair hearing.

## 6.2. Protection against any form of retaliation

6.2.1 Any Coface employee or third party who reports an irregularity or a suspicion of irregularity, provided that this is done in good faith and in compliance with the provisions of this procedure, must be protected against any acts of retaliation, whether or not the facts reported are proven right. On the other hand, Coface reserves the right to impose disciplinary sanctions for any abuse of the system, characterized by a slanderous denunciation made in bad faith.

6.2.2 For the purpose of this procedure, "retaliations" are defined as any action or threat of action which is unjustly detrimental to the Coface employee or third party because of their report, including indirectly. This includes<sup>27</sup>, but is not limited to, termination of the business relationship (suspension, layoff, dismissal, contract termination ...), refusal of career advancement, imposed transfer or changes in previous working conditions, disciplinary measures, disadvantageous treatment and damage to reputation. In addition, all illegal measures, such as harassment, discrimination, unfair treatment, etc., are also prohibited.

6.2.3 Any form of retaliation is considered to be a breach of loyalty and professional ethics requirements of the Code of Conduct. In such a case, disciplinary sanctions and criminal prosecutions may be faced. Where whistleblower considers that they have been the victim of retaliations or have good reason to believe so, they are entitled to complain to the Group Human Resources or Compliance Directors.

6.2.4 In addition, in the event where disciplinary measures unrelated to the whistleblowing are taken with time against the whistleblower, the Human Resources Director ensures that these disciplinary measures have no link with the whistleblowing escalated, cannot be considered as retaliation measures and are duly motivated.

<sup>25</sup> Art. 11 of the decree n°2022-1284.

<sup>26</sup> Art. 9.I. of the amended Sapin 2 law.

<sup>27</sup> Art. 10-1.II. of the amended Sapin 2 law.

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6.2.5 In the event of a judicial proceeding from the whistleblower against retaliatory measures, the burden of proof will be on the defending party to demonstrate that the concerned measures were not motivated by the reporting of presumed or suspected incidents<sup>28</sup>.

6.2.6 In the European Union, the whistleblower is also protected by Courts from any civil proceedings against them on the basis of the reporting<sup>29</sup>. Nor is a whistleblower criminally liable if they remove, misappropriate or conceal documents or any other medium containing information of which they have lawful knowledge and which they report under the conditions mentioned in this Procedure<sup>30</sup>.

## 7. INTERNAL CONTROLS

Coface implements appropriate controls to ensure that the whistleblowing mechanism is effective and efficient. Level 1 and 2 controls must be carried out on an ongoing basis to ensure appropriate collection and handling of the whistleblowing escalated. Periodically, the quality of the system is also reviewed by internal audit, as a level 3 control, such controls are always operated with protection of confidentiality as detailed hereinabove.

## 8. TRAINING AND COMMUNICATION

Training is a key element of ethic awareness and contributes to promote a strong Compliance culture. In accordance with the HR Training Program and applicable laws, regulations, all Coface employees receive a regular global mandatory training on Coface Code of Conduct and Anti-Bribery Program, which includes the whistleblowing mechanism. All new Coface employees receive this training within 30 days of their assignment.

Furthermore, any Coface employee in charge of the collection and the handling whistleblowing process must refer to the Whistleblowing Collection and Handling Standard Operating Procedure and must be subject to specific training sessions<sup>31</sup>, in view of their position, mission or knowledge.

More generally, the whistleblowing reporting system is subject to annual communication in Coface, in which Coface employees are reminded the current group rules and the reporting channels. Coface managers receive communication on the escalation system.

<sup>28</sup> Art. 10-1.III. of the amended Sapin 2 law.

<sup>29</sup> Art. 10-1.I. of the amended Sapin 2 law and article 21 of the Directive (EU) 2019/1937.

<sup>30</sup> Art. 122-9 of the French Criminal Code

<sup>31</sup> Art. 11 of the decree n°2022-1284.

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Specific key performance indicators have been deployed regarding whistleblowing and are presented five times a year to Coface's top management through the Coface Group Risk and Compliance Committee (CRGCC) and to the Board Risk Committee.

## 9. RECORD RETENTION

All whistleblowing related records must be retained in accordance with local laws and regulations that apply, in particular regarding the special requirements on sensitive data where applicable, and must be readily retrievable. However, in the context of whistleblowing, all archives are anonymized as soon as the knowledge of the Coface employee or third party identity is no longer strictly needed.

As a minimum requirement of five (5) years, the following records must be retained in electronic or paper format:

- o Records relating to documentation, information on the presumed or suspected incidents disclosed to the appropriate channels;
- o Records relating to the alerts handling and remedial measures taken by the Whistleblowing Forum;
- o Records relating to trainings and communications.

Coface is responsible for the processing and protection of data collected in the context of whistleblowing investigations.

## 10. PROCEDURE EFFECTIVE DATE AND REVIEW

These Group Rules are effective as of **XXX** 2023. This procedure should be reviewed and approved, at least every two years, by the Group Compliance Director and any material amendments must be presented to Group General Secretary. These Procedure is distributed to all concerned employees. The procedure is also made available on WeConnect and Coface's website.

### APPENDIXES

- o **APPENDIX I – Procedure addendum template**
- o **APPENDIX II – External channels information**

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## APPENDIX I - GROUP RULES ADDENDUM TEMPLATE

Date of Addendum Publication:

Addendum Version Number:

<b>Country/Region</b>	
<b>Coface Legal entities covered by this addendum</b>	
<b>Line of Business covered by this addendum</b>	
<b>Contact name, position and team</b>	

<b>Impacted Group Rules Section</b>	
<b>Group Rules Section Ref:</b>	
<b>Group Rules Section Title:</b>	
<b>Variance, Derogation?</b>	
<b>Change to the Group Rules</b>	
<b>Reason for the change to the Group Rules</b>	
<p>Provide title, link and details of the Regulation or Law that requires this Addendum.</p> <p>Please be specific e.g. clause, paragraph or page number, etc.</p> <p>Please add any further relevant information (if any) e.g. Legal Advice or additional references for audit trail and complete reference.</p>	

<b>Type of modifications</b>	<b>Definition</b>
Variance	A variance must be drafted when local laws and regulations are stricter than the Group Rules.
Derogation	A derogation must be drafted when local laws and regulations are in conflict with the Group Rules.



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## APPENDIX II - EXTERNAL CHANNELS INFORMATION

Although it is always recommended to make an internal reporting, so that the situation can be adequately handled, both Coface employees and third parties may directly use external channels<sup>32</sup>.

In France, external ethical alerts could be addressed to different authorities depending on the nature of the situation reported<sup>33</sup>. The external authorities include but are not limited to:

Subject	Authority	Contact
Breaches of probity, corruption allegations	French Anti-corruption Agency (AFA)	<a href="https://agence-francaise-anticorruption.gouv.fr">Faire un signalement   Agence française anticorruption (agence-francaise-anticorruption.gouv.fr)</a>
Financial services, products and markets Prevention of money laundering and terrorist financing	French Prudential control and resolution Authority (ACPR).	<a href="https://acpr.banque-france.fr/controler/signaler-lacpr-un-manquement-ou-une-infraction">https://acpr.banque-france.fr/controler/signaler-lacpr-un-manquement-ou-une-infraction</a>
Product safety and compliance, Consumer Protection	French General Directorate for Competition, Consumer Affairs and Fraud Control (DGCCRF)	<a href="https://signalconso.gouv.fr">SignalConso, un service public pour les consommateurs</a>
Protection of privacy and personal data, security of networks and information systems	French Data processing and liberties Commission (CNIL)	<a href="https://www.cnil.fr/fr/lanceurs-dalerte-adresser-une-alerte-la-cnil">https://www.cnil.fr/fr/lanceurs-dalerte-adresser-une-alerte-la-cnil</a>
Individual and collective labor relations, working conditions	French Labor Law Inspection	<a href="https://service-public.fr">Dans quels cas recourir à l'inspecteur du travail ?   Service-public.fr</a>
Discriminations	French Human rights defender	<a href="https://www.defenseurdesdroits.fr/fr/lanceurs-dalerte">https://www.defenseurdesdroits.fr/fr/lanceurs-dalerte</a>

The Coface employee or third party can also make an alert directly to the judicial authorities<sup>34</sup>.

All guarantees associated to an external whistleblowing are specified in the decree.

<sup>32</sup> Art. 8 of the decree n°2022-1284.

<sup>33</sup> The list of authorities is provided in the appendix of the decree n°2022-1284 of October 3, 2022 relating to the procedures for collecting and processing suspected or presumed incidents and setting the list of external authorities instituted by Law n° 2022-401 of March 21, 2022 aimed at improving the protection of whistleblowers.

<sup>34</sup> Art. 8.II of the amended Sapin 2 law.