

COMPLIANCE CHARTER

Mobilize Financial Services GROUP

The purpose of this Compliance Policy is to remind the fundamentals for preventing non-compliance risk within the Mobilize Financial Services (Mobilize FS) Group, and the action enabling a culture of compliance to be instituted at all levels of the company.

Why?

Because Compliance is **everyone's business**:

- Officers and executives display exemplary conduct and encourage the dissemination of compliance culture at all levels of the company (“tone from the top”).
- The dedicated expert teams (Group Compliance Division and its local network) supervise the implementation and steering of the compliance system and ensure that it is observed.
- All company employees within the operational teams apply the defined internal rules and procedures in their day-to-day work.

Each employee individually and all employees collectively are responsible for ensuring compliance within Mobilize FS, in order to preserve its image and reputation.

For that purpose, they must act faithfully and show honesty, impartiality, and independence in carrying out their duties within Mobilize FS, notwithstanding their own interests.

This is a guarantee of trust of our customers, business partners, investors and shareholders, and a driver of competitiveness for the group.

This Compliance Policy :

- Recalls the key notions, the applicable scope and the fundamental principles for steering Compliance that have been established in relation to the risk appetite of Mobilize FS's Board of Directors and executive bodies.
- Identifies the main Compliance risks
- Defines the Compliance function, its missions and organization.
- Defines the mechanism for preventing non-compliance risks.
- Institutes the implementation of a training and communication program as a key focus in developing the compliance culture within Mobilize FS.

This Group Compliance Policy is signed by the Chief Compliance Officer, presented to the Internal Control and Compliance Committee and applies to all Mobilize FS Group employees, without exception, in France and in all countries where Mobilize FS operates.

Caroline Jeandeau
Chief Compliance Officer

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I. KEY CONCEPTS, SCOPE OF APPLICATION AND FUNDAMENTAL PRINCIPLES

a. What is compliance ?

Compliance refers to respecting laws and regulations in force, as well as the company's internal procedures and rules, in order to ensure the compliance of the institution's day-to-day operations, and thereby to preserve its reputation, image and financial performance.

How to be compliant?

- ✓ Accept and promote a professional conduct that conforms to the ethics and values of the Group
- ✓ Comply with laws, regulations, professional standards and rules
- ✓ Avoid conflicts of interest, or declare them if they arise
- ✓ Make integrity the criterion for choosing our business partners, suppliers, subcontractors
- ✓ Take all reasonable measures to preserve the confidentiality of the information processed in the context of our professional activities
- ✓ Protect the assets of the company
- ✓ Protect the interests of customers

b. What is the risk of non-compliance ?

The risk of non-compliance is defined as the risk of judicial, administrative or disciplinary sanctions, significant financial losses or injury to our reputation, arising out of failure to comply with the provisions specific to banking and financial businesses, whether of a legislative or regulatory nature (national, European or international), or whether they are professional standards or good conduct rules, or instructions of executive directors taken pursuant to, inter alia, the orientations of Mobilize Financial Services's supervisory body.

Thus, the main consequences of non-compliance may be:

- **Reputational:** loss incurred due to the respectability and reputation of Mobilize Financial Services being compromised as a result of adverse media, whether founded or unfounded, of failures in business practices, failure to comply with laws and regulations in force, or the breaching of rules of good conduct and professional ethics, whether by the company itself or by its employees.
- **Legislative or regulatory:** (i) risk of sanctions by the supervisory authorities as a consequence of non-compliance with legislative, regulatory or normative provisions in force, including where this is due to changes in such rules, (ii) risk of litigation with a customer, a counterparty or other third party; (iii) risk of loss resulting from ill-adapted internal processes, failings due to human error or external events.

c. Scope covered by the Compliance mechanism within Mobilize Financial Services

Among the main areas of Compliance within Mobilize FS there are:

- Ethics system (ethics charter, professional ethics rules, management of conflicts of interest, gifts, and invitations)
- Combating financial crimes integrating the risks of corruption, money laundering and the financing of terrorism, internal/external fraud (excluding the risk of credit-related fraud), sanctions and embargoes.
- Protecting personal data
- Customer protection

d. Values and principles promoted by Mobilize Financial Services Group

As a banking institution and under the supervision of the European Central Bank since 2016, Mobilize FS Group is subject to the strictest banking regulations.

The Group all of its resources to act with integrity, respect and transparency, values which are an integral part of its DNA and at the heart of its professional ethics and compliance system.

In line with Mobilize FS Group's risk governance policy, the management of risks of non-compliance is based on the following key principles:

- The zero-risk appetite** defined by the Board of Directors in matters of non-compliance is testimony to the firm commitment and unequivocal will of the company and its management to comply with all applicable rules and norms, at all times.
- The definition and deployment of the **rules, policies and internal procedures** concerning Compliance risks by the Group Compliance Division, in line with the applicable regulations, make it possible to ensure that all of MOBILIZE Financial Services's activities meet the requirements laid down by law, by the competent supervisory and regulatory authorities, by applicable professional standards, and the instructions of its executive bodies in line with the orientations given by the Board of Directors of MOBILIZE Financial Services.
- Taking Compliance risks into account when **defining strategic and commercial objectives**.
- Integrating the Compliance function into **projects** from the very start, so as to identify the potential non-compliance risks and define action to avoid/reduce them ("**compliance by design**").
- Regular and **clear communication** concerning the subjects of Compliance, with the strong involvement of executive bodies and the exemplary approach that is expected from one and all, at all levels of the company.
- The continuous development of a **compliance culture** within the company and the individual **responsibility** of all employees for non-compliance risks and the impacts that they may have on the image and reputation of MOBILIZE Financial Services and its financial performance.
- Training** and raising awareness of employees in the various business lines, in all departments and divisions included, in order to be able to identify and prevent risks of non-compliance in line with group rules and the defined objectives.
- Finally, the system of **compliance risk control** via functions that are independent from operational and commercial functions.

II. GOVERNANCE AND ORGANIZATION

a. Commitment of executive decision-making bodies in defining compliance strategies and overall control of Compliance within Mobilize Financial Services

The commitment of executive body lies at the heart of Mobilize FS's ethics and compliance system.

General Management, with its Executive Committee, promotes the compliance system in line with the guidelines given by the Board of Directors of the Mobilize FS and contributes to ensuring its effectiveness through the following actions:

- Personal and collective communication about ethics and compliance risks, and Group values, to ensure that all employees adhere to them,
- Centralized steering of the Compliance system,
- Contribute to putting the necessary action in place to strengthen the prevention and detection of non-compliance risks, and the Group's risk control system.

b. Position, roles, and responsibilities of the Compliance function. Appointment of the Chief Compliance Officer

The executive managing body of Mobilize Financial Services is responsible for designing, deploying and controlling the Compliance system at the group level. This responsibility is delegated to the Chief Compliance Officer, member of the Executive Committee, who regularly reports to General Management/CEO and the Board of Directors of Mobilize Financial Services.

As the person in charge of Compliance at the level of the Mobilize Financial Services Group, the Chief Compliance Officer has the task of defining the overall policy in matters of compliance and ensuring that it is taken into account in defining the strategic objectives of Mobilize FS.

He ensures the implementation of the compliance programme in the local entities of Mobilize Financial Services and provides them with the necessary support via common policies and methodologies.

He is also responsible for ensuring the consistency and effectiveness of compliance risk control system and heads up the compliance verification function.

The terms for appointment to office and removal from office of the Chief Compliance Officer are specified in the Policy for the aptitude of executive officers of Mobilize Financial Services.

In line with applicable regulations, a candidacy for the position of Chief Compliance Officer is presented to the Nomination Committee of Mobilize Financial Services which will issue a recommendation. The candidate is then presented to the Board of Directors for approval of his appointment. The appointment decision is notified to the competent supervisory authorities (Joint Supervisory Team, JST, grouping together the representatives of the European Central Bank and the French banking authority (ACPR - *Autorité de Contrôle Prudentiel et de Régulation*)).

In the context of selecting candidates for this position, the Nomination Committee ensures that the candidate has the skills, experience, and integrity required to hold this office.

Employees who assist the Chief Compliance Officer in these duties shall have the necessary knowledge due to their experience and training and hold an adequate position to carry out their tasks and access the information required to perform their duties.

c. Tasks, organization, and functioning of the compliance function within Mobilize FS

The tasks of the Compliance function consist in steering/supervising the consistency and effectiveness of the risk prevention mechanisms and plans for controlling risks of non-compliance of Mobilize FS group.

The Compliance function, which is independent of the operational and commercial functions, is responsible in particular for:

- Assisting General Management/CEO of the MOBILIZE FS group and the Managing Directors of local MOBILIZE FS entities in ensuring compliance with rules and professional ethics with which the group must comply;
- Identifying and assessing the Compliance risks;
- Assisting General Management/CEO of the MOBILIZE FS group and the Managing Directors of local MOBILIZE FS entities in the management and control of these risks;
- Informing personnel as to changes in rules in Compliance matters and deploying training action for all employees;
- Representing MOBILIZE FS before external bodies (supervisory authorities, administrative authorities, mediators, rating agencies, professional bodies).

To accomplish these missions, the Group Compliance Division is responsible for:

- Providing for the conception of policies, principles and procedures intended to comply with the authorities' requirements in Compliance matters in order to protect the interests of customers and the image of the group;
- Contributing to ensuring compliance with laws and regulations applicable to the exercise of the banking activity and all of the offered services, including in a cross-border context, by way of a regulatory watch system;
- Proposing and supervising the application of procedures intended to ensure compliance with the obligations arising in matters of Financial Security, and in particular in anti-money laundering and combating the financing of terrorism, anti-bribery and anti-fraud matters, in accordance with laws and regulations in force and with the principles laid down by the Mobilize FS group;
- Ensuring compliance with professional standards in the market;
- Participating and providing opinions on methods making it possible to comply with good conduct rules and principles defined at the level of the Renault Group, and defining specific rules according to the nature of the positions held by employees and the information to which they may have access;
- Ensuring the dissemination of and compliance with professional good conduct rules, including respecting the professional duty of confidentiality, and personal integrity rules within the whole of the Mobilize FS group;
- Integrating an analysis of Compliance risks in the first stages of any new project, product, activity or process ("compliance by design");
- Defining and deploying the compliance monitoring plan

The Compliance function at Mobilize FS is organized as follows:

- The **Group Compliance Division** is responsible for steering the main risks of non-compliance at the MOBILIZE FS Group level. In this respect, it defines the group rules (policies, procedures, code of conduct, monitoring indicators and reporting), provides for a regulatory watch, provides advice to operational staff, carries out action to identify zones of risk and the deployment of corrective measures in the event that dysfunction is observed, enabling these risks to be controlled at the group level. It is supported by Compliance network in MOBILIZE FS local entities.
- The **Compliance Managers/Correspondents** in the various countries are the local referees of the Group Compliance Division. They deploy/transpose the group compliance mechanisms at the local level, propose additional rules that are required having regard to applicable local regulations, advise the local Managing Committee and operational teams on compliance matters, draw up non-compliance risk mapping at the level of their own entity, propose mitigation or remediation actions, provide for a regulatory watch to guarantee compliance with local standards in force and inform the Group Compliance Division thereof. They are also responsible for relaying the action initiated at the group level and executing the stipulated reporting obligations.

- The **employees** responsible for operational activities within the various business lines, departments and entities of MOBILIZE FS contribute to managing Compliance risks and carrying out the necessary checks, in line with the principle of independence and separation of tasks, and in complete transparency. In the context of their day-to-day duties, they ensure compliance with laws, internal rules and codes of conduct of the enterprise, in order to ensure that the image and reputation of MOBILIZE FS are preserved.
- The Compliance function is adapted to the local operational organization, but relies on the group standards. Thus, in each operating country, the Compliance function is responsible for ensuring that the activities and operations of each entity comply both with local regulations and with the standards and rules applicable at the MOBILIZE FS group level. The local compliance system is adapted to take account of the specific activities and characteristics of each entity, the corresponding issues and matters at stake, and the resources available to it.
- The Compliance function takes support from other teams and departments involved in the management of risks and checks, such as: the risk division, internal control, internal audit, legal, management control functions.

d. Competent committees

Steering the Compliance risk management for Mobilize FS is monitored by the following bodies:

- The **Compliance and Internal Control Group Committee**, comprising all members of the Mobilize FS Executive Committee, are informed of Group Compliance policy, examines Group Compliance projects and supervises any shortcomings identified and the corresponding remediation plans. In particular, it is responsible for overseeing the risk of corruption and unethical behavior, including the risk of internal/external fraud (excluding credit-related fraud).
- The **Risk Committee of the Board of Directors** supervises Mobilize FS's critical non-compliance risks, such as money laundering and terrorist financing, personal data protection, customer protection risk and risks associated with prudential banking regulations.
- The **New Product/New Project Committee** analyses compliance risks upstream of the launch of each new product, project, activity, or process, in order to define an appropriate system in line with regulatory expectations.
- Each local Mobilize FS entity within the consolidated control perimeter in line with the Internal Control Charter sets up **equivalent local bodies**.
- For entities outside the consolidated control perimeter, or JV subsidiaries, the local Compliance manager must define an organization and reporting system equivalent to that existing in the centralized control perimeter.
- **Thematic committees** have also been set up to deal with the various Compliance risks in greater detail.

e. Reporting

In line with its missions, the Compliance function defines the rules for reporting on Compliance risks enabling the executive managing bodies and the Board of Directors of MOBILIZE Financial Services to have sufficient information concerning the management of such risks to take the suitable decisions.

For this purpose, quarterly reporting on Compliance risks is made by the Group Compliance Division to Group Management/CEO, to the Executive Committee and to the Board of Directors, covering the features of the compliance systems in place, the results of checks and audits, any action rolled out (identification of risks, training, alerts regarding shortcomings and their correction, follow-up on recommendations made following enquiries and audits by regulatory authorities, etc.).

This reporting is based on the business-line's and country reporting which is escalated to the Group Compliance Division, according to the defined process.

At least twice per year, reporting on the activity and results of compliance auditing, including any material incidents that are revealed, are transmitted to the Board of Directors for examination.

Annual reports are also produced for the competent authorities. They are first submitted to the executive bodies and to the Board of Directors of Mobilize FS for approval.

III. THE MAIN ELEMENTS OF THE COMPLIANCE SYSTEM AT MOBILIZE FINANCIAL SERVICES

The mechanism for preventing risks of non-compliance includes the following:

a. Regulatory watch and monitoring of regulatory developments

The regulatory watch and the monitoring of developments form a key element of the Compliance risk prevention and control system.

The regulatory watch within Mobilize Financial Services is organized by dedicated procedures and involves various departments at the corporate level (Compliance Division, Risk Management Department, Finance and Treasury Department, Legal Division etc.) for subjects within their respective fields of activity and expertise.

Monitoring of the regulatory watch is undertaken on a regular and on-going basis, in order to be able to identify as soon as possible any change that may have a material impact on Mobilize Financial Services' operations and ensure that the personnel concerned are informed.

Each local entity of Mobilize Financial Services is responsible for deploying a suitable regulatory watch at the local level, in coordination with the local legal team where relevant, and to ensure compliance with new rules applicable to its activities and operations.

The local Compliance referees are therefore required to inform the Group Compliance Division of any draft legislation or any regulatory changes, whatever its nature, that may have an impact on the activity of Mobilize Financial Services in the country in question and submit to it for validation the planned actions to be taken to ensure compliance.

The Group Compliance Division informs the local Compliance Correspondents of any new French or European provisions that are applicable to Mobilize FS as a group.

Local Compliance referees must **inform the Chief Compliance Officer** whenever local regulatory provisions prevent the application of French or European rules applicable on Mobilize FS. This information must be notified to the ACPR.

Several other sources make it possible to follow the relevant regulatory news for Mobilize FS:

- ➔ Official sources: publications of texts or draft laws, decrees, directives or European regulations, guidelines or recommendations issued by the competent French authorities (ACPR, AMF, AFA, CNIL, etc.), European (ABE, ESMA, EIOPA, EDPS, etc.), international and national.
- ➔ Non-official sources are constituted by banking or financial professional associations which complete and relay all of the regulatory publications issued by official bodies. These include periodic newsletters from the French Banking Federation (FBF) and the French Association of Financial Companies (ASF) in France or equivalent bodies in other countries.
- ➔ Mobilize FS also relies on publications from specialized consulting firms that periodically publish detailed analyses on the impact of implementing new regulations.

b. Non compliance risk mapping

In line with the MOBILIZE Financial Services risk governance policy, a relevant risk mapping is built to identify and address each Compliance risk mentioned in § I-c) of this charter.

The risk mapping for Compliance risks is steered by the Group Compliance Division, in coordination with the business lines at the Corporate level, and in association with the compliance correspondents in the local MOBILIZE FS' entities.

Its purpose is to identify real and potential risks that are or could be incurred by MOBILIZE Financial Services in the context of its activities, assess them (gross, net and residual risk), define suitable mitigation rules, assess the degree of control over these risks and, depending on the result, define the necessary action to remedy any shortcomings observed.

Updating of the risk mapping for each Compliance risk must be carried out at least annually.

The recommendations/orientations given by the competent authorities are analysed so that they are taken into account in the adopted methodological approach.

c. Procedural framework

As a banking institution, Mobilize Financial Services is subject to all regulations in this area. In addition, considering all of its activities, products and services offered to its customers, including in the field of insurance and new mobility solutions, it must also comply with all of the rules applicable to these specific sectors.

Internal rules in matters of Compliance within Mobilize Financial Services group together various procedures enabling it to meet the applicable legal obligations. The main policies and procedures deployed within Mobilize Financial Services are listed below:

- Groupe Renault's Ethics Charter and Anti-Corruption Code of Conduct
- Procedure on Combatting corruption and influence-peddling
- General procedure and operational procedures concerning Anti-money laundering and combating the financing of terrorism
- Conflict of Interest Prevention and Management procedure
- Gifts and Invitations procedure
- The Professional Alert Management Committee procedure
- Procedures for the Third-Party Integrity Assessment and Management Process
- All procedures related to Personal Data Protection (Data Retention Period-Purge-Anonymization of Personal Data, Management of Individual Rights, Data Breach, etc.)
- Internal/External Fraud Prevention procedures (excluding credit)
- The New Product Procedure and Delegation of Authorities (DOA)
- The Compliance Control procedure.

These procedures and policies defined at group level are completed by local procedures and operating procedures developed in coordination with the business lines to ensure that they are taken into account in operational processes.

Internal Compliance mechanisms are continuously reviewed and adjusted to take into account regulatory changes and supervisory authorities' requirements.

d. Notice of compliance

A compliance opinion is a response by a member of the Compliance team/function to an issue raised by an Mobilize Financial Services employee on a topic that may give rise to risks in the area of Compliance.

Where the Compliance function is called on for an opinion, it must define a rule/recommendation enabling to ensure compliance with the rules applicable to MOBILIZE Financial Services. This recommendation will be formalised under its responsibility and must be taken into account in the framework of the decision-making process by the stakeholders concerned.

In particular, compliance opinions are provided when analysing a new project/product/service/process/activity or material changes affecting an existing product/service/processor their associated systems, in the context of a dedicated committee (for example, New Product/Project Committee) or an ad hoc committee, in the framework of validating a decision note (NDD, NDI, NRI) or at any other time, on request.

This prospective analysis of the incurred risks is made **prior** to carrying out the operations.

The opinion of the Compliance function may be:

- favourable and lead to approval, with or without reserves
- unfavourable and lead either to the re-examination of the file (with the production of additional elements), or refusal of the file due to evident non-compliance.

Compliance opinions are formalised in writing and kept in the files, for a minimum period of 5 years, to ensure audit track on compliance with the stated recommendations.

e. Compliance monitoring

To ensure compliance with Compliance standards, a Compliance Control Plan is defined for each risk of non-compliance, under the guidance of the Group Compliance Division.

The development of this annual plan shall take into account in particular:

- ✓ The risks identified in the associated risk mapping
- ✓ The history of reported incidents
- ✓ Results of internal/external audit missions
- ✓ Recommendations and observations of the competent supervisory authorities.

The points to be checked are split into 3 levels, in line with the principle of separation of tasks to ensure the necessary independence between operational functions (business lines) and control functions (internal control, compliance verification function and internal audit).

The managers in the business lines must inform their teams of the rules and procedures to be followed in the day-to-day operations under their responsibility and ensure that compliance controls on their charge (1st level controls) are properly deployed.

The control plan is regularly reviewed and updated in consultation with internal control. At the end of the checks carried out, the results of which are presented to the competent committees, actions are defined and deployed in order to remedy the deficiencies found.

The Compliance Group Division monitors the implementation of corrective actions with the business lines/countries concerned.

The Group Compliance Division's non-compliance risks controls cover exhaustively and in addition to the controls carried out by Internal Control:

- The fight against corruption
- Combating money laundering and terrorist financing
- Internal and external fraud (excluding credit)
- Information and communication technologies (ICT)
- Personal data

f. Detecting dysfunction

A compliance dysfunction is any incident or anomaly showing that an internal or external rule has not been respected, in whole or in part, which may potentially give rise to a risk of disciplinary or criminal sanctions for or injury to the image of MOBILIZE Financial Services or the group entity in question.

The systems put in place within MOBILIZE Financial Services make it possible for the business lines and local internal controllers to escalate non-compliance incidents and alerts to the Group Compliance Division.

Operational risk incidents such as internal/external fraud (other than credit-related fraud) are systematically recorded in the ERM database.

Indicators for the tracking of each Compliance risk (§I-c) defined in the corresponding applicable procedures, ensure escalation of any anomalies detected, in line with the Risk appetite framework, so that suitable measures are promptly defined and put in place.

Each local entity is required to put in place the necessary procedures to:

- ✓ Promptly detect and analyse incidents,
- ✓ Report non-compliance incidents to the operational business lines involved in risk management and to the local and group Compliance function,
- ✓ Ensure the monitoring of incidents/dysfunctions and appropriate remedial measures, in order to eliminate the causes.

Every officer, manager or employee has the possibility of raising questions about any dysfunctions with the Compliance Manager or the relevant business line manager in their local entity or directly with the Chief Compliance Officer.

g. Whistleblowing System

The professional alert / whistleblowing mechanism provides each Group employee with the possibility of expressing themselves if they have reason to believe that the instructions they have received, a transaction being examined or generally a particular situation, do not comply with the rules governing the conduct of the Group's activities. This right is limited to the areas covered by the Code of Conduct (ethics charter, anticorruption code of conduct) and the external and internal provisions to which it refers.

To exercise this right, employees may use the traditional circuits (line management, HR function) or a dedicated tool (WhistleB) enabling their concerns to be passed up directly to the Chief Compliance Officer, notably in the event of unethical conduct or conflicts of interest.

h. Business relations with third parties– Integrity Analysis

The activities of MOBILIZE Financial Services necessarily involve business relations with numerous third parties: customers, banking counterparties, insurers, intermediaries, suppliers, service providers, subcontractors, commercial partners.

Entry into business relations with a third party, whatever their nature, is the subject of an analysis in terms of compliance, in order to verify inter alia their integrity, in line with regulatory requirements and to enable the management of reputation risk.

Dedicated procedures provide the framework for carrying out such due diligence on entering into business relations (including at the time of mergers and acquisitions or for outsourced services) and during business relations and taking them into account in the decision-making process.

These analyses are kept at the end of controls and reporting, in compliance with applicable regulations.

IV. COMPLIANCE CULTURE AND COMMUNICATION

To ensure knowledge of the internal and external standards to be respected, the development of the compliance culture is an essential part of any effective Compliance system.

a. Compliance Training Plan

Within Mobilize FS, to raise employee awareness of Compliance risks, disseminate best practices and thus protect the company and its customers, mandatory training has been implemented on the following themes:

- Ethics
- Fight against corruption and influence peddling
- Combating money laundering and terrorist financing
- The fundamentals of GDPR
- Managing conflicts of interest
- Professional Alerts

The content of the training includes practical case studies to complete knowledge of the normative framework, so that the employees can identify situations at risk and better understand the appropriate rules to apply.

These training sessions are deployed to all group entities, and concern all employees, including members of the managing executive bodies and the directors, with specific modules for the most sensitive populations.

The managers are actively involved in following up on training by their teams to ensure that the requisite training has been undertaken in line with the established schedule.

The Compliance function is supported by the Human Resources teams for the deployment and monitoring of training campaigns and defining the regulatory course in Compliance matters for new arrivals.

The procedures concerning each Compliance risk specify the frequency of and terms for following up on the corresponding training, and the sensitive populations for the in-depth modules.

b. Mobilize Financial Services Compliance Intranet

Among other actions to disseminate and promote the culture of compliance within Mobilize FS, the Group Compliance Division launched its compliance intranet in December 2020.

This support is used to communicate news and share essential information that all Mobilize FS employee needs to know (Ethics Charter, procedures and deployment kit, conflict of interest declaration forms, link to the Professional Alerts system, communication campaigns, gift and invitation registers, fraud awareness videos, etc.).

c. Compliance Communication Plan

In coordination with the Human Resources/Communication team, in order to continue raising awareness around compliance topics and strengthen synergies between the compliance function and all other functions and business lines of the company, a dedicated communication plan has been built up.

Among the actions defined:

- Presentations by Chief Compliance Officer at CEO forum
- Sharing best practices and identifying areas for improvement through the Compliance Champions community
- Regular communications on compliance topics in different formats (newsletters, quizzes, events)
- Intervention of the Compliance function during the "business line" committees held with the countries
- External communication on Compliance policy on Mobilize FS institutional website and annual report.