

COMPLIANCE POLICY

Mobilize Financial Services Group

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

Why?

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

- officers and executives display exemplary conduct and encourage the dissemination of the compliance culture at all levels of the enterprise (“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 the 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 Financial Services, 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 Financial Services, notwithstanding their own interests.

That is a guarantee for the 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 the Board of Directors and of the executive bodies of Mobilize Financial Services
- Identifies the main risks in the field of Compliance
- Defines the Compliance function, its missions and its organization
- Defines the mechanism for preventing non-compliance risks
- Institutes the implementation of a training and communication programme as a key focus in developing the compliance culture within Mobilize Financial Services.

This Compliance Policy Group applies to all Mobilize Financial Services’ employees, without exception, in France and in all countries where the group operates.

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I. KEY NOTIONS, SCOPE 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 enterprise
- ✓ 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' 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 Financial Services there are:

- The professional ethics system (code of conduct, professional ethics rules, managing conflicts of interest, gifts and invitations)
- Combating financial crimes integrating the risks of corruption, money-laundering and the financing of terrorism, internal/external fraud (other than credit-related fraud), sanctions and embargos
- Protecting personal data
- Protecting customers

d. Values and principles promoted by the Mobilize Financial Services Group

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

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

In line with the Mobilize Financial Services 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 Department, in line with the applicable regulations, make it possible to ensure that all of Mobilize Financial Services' 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 the executive body is at the heart of Mobilize Financial Services' good conduct 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 Mobilize Financial Services and contributes to ensuring its effectiveness through the following action:

- personal and collective communication on good conduct and Compliance risks, and the values of the group, so as to ensure adherence by all employees,
- centralised steering of the Compliance system,
- contributing to putting the necessary action in place to strengthen the prevention and detection of non-compliance risks and the risk control system within the group.

b. Position, roles and responsibilities of the Compliance function. The appointment of Group 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 Group 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 Group 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 Financial Services.

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 Group 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 Group 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 Group 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.

Tasks, organization, and functioning of the compliance function within Mobilize Financial Services

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

The Compliance function, independent of operational and commercial functions, shall, in particular, have the following responsibilities:

- assisting General Management/CEO of the Mobilize Financial Services group and the Managing Directors of local Mobilize Financial Services 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 Financial Services group and the Managing Directors of local entities of Mobilize Financial Services 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 Financial Services before external bodies (supervisory authorities, administrative authorities, mediators, rating agencies, professional bodies).

To carry out these tasks, the group Compliance Department 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 Financial Services 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 Financial Services 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 within Mobilize Financial Services is organized as follows:

- The **Group Compliance Division** is responsible for steering the main risks of non-compliance at the Mobilize Financial Services 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 if dysfunction is observed, enabling these risks to be controlled at the group level. It is supported by Compliance network in Mobilize Financial Services 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 Financial Services 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 Financial Services 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 Financial Services 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.

c. Competent committees

Steering of the Compliance risks for Mobilize Financial Services is monitored by the following bodies:

- The **Ethics, Compliance and Internal Control Committee** at the Group level, attended four times per year by all members of the Executive Committee of Mobilize Financial Services, defines and validates the Group policy in Compliance matters, examines group projects relating to Compliance and supervises any observed shortfalls and the corresponding remedial plans. It is, in particular, responsible for supervising the risk of corruption and unethical conduct, including the risk of internal/external fraud (other than credit-related fraud).
The mandatory topics presented during Ethics and Compliance Committee are:
 - Ethics and Professional Alerts
 - News and ongoing actions (including training, new procedures, risk monitoring indicators) on the main compliance risks:
 - Anti-money laundering and counter financing of terrorism
 - Anti-corruption (third party integrity management process, risk mapping...)
 - Internal/external fraud
 - Customer protection and complaints
 - Data Privacy
 - Results of controls / non-compliance incidents identified
 - Ongoing projects/new products: reserves, if any, upon approval of new products/projects (Decision notes/New Product Committee)
- The **Risks Committee of the Board of Directors** supervises critical non-compliance risks of Mobilize Financial Services, such as the risk of money laundering and the financing of terrorism, the personal data protection risk, the customer protection risk, and risks associated with prudential regulations in banking matters.

- The **New Product/New Project Committee** analyses the Compliance risks in advance of the launch of each new product, project, activity or process, in order to define a suitable system that complies with regulatory expectations.
- Each local Mobilize Financial Services entity which enters within the scope of consolidated control in line with the Internal Control Charter is in charge to put **locally equivalent decision-making bodies** in place. Thus, minimum three Ethics and Compliance Committees per year take place for each local entity. The topics presented are identical to the list defined here above for the group Ethics and Compliance committee.
- For entities which are not within the scope of consolidated control, or JV subsidiaries, the local Compliance manager defines an organization and reporting system equivalent to what exists within the scope of centralised steering system.
- **Specific committees** are also put in place in order to deal with the various Compliance risks in greater detail.

d. 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-lines' 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 Financial Services for approval.

III. THE MAIN ELEMENTS OF THE COMPLIANCE SYSTEM WITHIN Mobilize Financial Services

The non-compliance risk prevention system has the following elements:

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 Department, Risk Management Department, Finance and Treasury Department, Legal department, 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 Financial Services as a group.

The local Compliance referees must **inform the Group Compliance Officer** whenever local regulatory provisions prevent the application of French or European rules applicable to Mobilize Financial Services. This information must be notified to the ACPR.

Several other sources make it possible to monitor regulatory developments that are of relevance for Mobilize Financial Services:

- Official sources: publications of draft legislation, Decrees, European Regulations or Directives, guidelines or recommendations issued by the competent French (ACPR, AMF, AFA, CNIL, etc.), European (ABE, ESMA, EIOPA, EDPS etc.), international and national authorities.
- Non-official sources are formed by banking or financial industry associations which complete and relay all of the regulatory publications issued by the official bodies. Among them are periodic information letters from the French Banking Federation (FBF) and French Association of Financial Companies (ASF) in France or equivalent bodies in other countries.
- Mobilize Financial Services also relies on publications by specialised law firms which periodically publish detailed analyses on the impact of implementing new regulations.

b. 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 Financial Services 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:

- the Ethics Charter and the Anti-corruption Code of Conduct of the Renault Group
- the procedure on Combating corruption and influence-peddling
- the general procedure and operational procedures concerning Anti-money laundering and combating the financing of terrorism
- the procedure on Preventing and managing conflicts of interest
- the procedure on Managing Gifts and Invitations
- the procedure of the Committee for Processing Professional Alerts/Whistleblowing
- the procedures concerning the Process for Assessing and Managing Third Party Integrity
- all of the procedures on Personal Data Protection (Duration data storage-purge-anonymizing of personal data, Managing individual permissions, Data breaches, etc.)
- the procedures concerning the Prevention of Internal/External Fraud
- the New Product Procedure and Delegation of Authorities (DOA)
- the Compliance Control procedure.

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

Any exemption from group rules implies a mandatory formal prior approval from the Chief Compliance Officer and conserved.
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The internal systems related to Compliance topics are constantly reviewed and adjusted to take account of regulatory changes and the demands of the supervisory authorities.

d. Compliance opinions

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 control

To guarantee respect for Compliance rules, a Compliance control plan is defined for each Compliance risk, under the scope of steering by the Group Compliance Division.

When drawing up this annual plan, the following points are taken into account:

- ✓ the risks identified in the associated risk mapping
- ✓ the history of reported incidents
- ✓ the results of internal/external audit missions
- ✓ the 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. On completing the controls, the results of which are presented in the competent committees, action is defined and deployed to remedy any observed failings.

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

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 the necessary procedures in place 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,
- ✓ Provide for the monitoring of incidents/dysfunctions and the appropriate remedial measures, in order to eliminate their causes.

Every officer, manager or employee has the possibility to submit their questions and concerns to the Compliance Manager or the manager of the business line in question in their local entity or directly to the Group Compliance Officer.

Professional alert / whistleblowing mechanism

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 Group Compliance Officer, notably in the event of unethical conduct or conflicts of interest.

g. 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 guarantee proper knowledge of the internal and external rules to be observed, the development of a compliance culture is a key element of any effective Compliance system.

a. Compliance training plan

Within Mobilize Financial Services, to raise employees' awareness to Compliance risks, disseminate good practice and thereby protect the company and its customers, compulsory training has been put in place on the following themes:

- Ethics
- Combating corruption and influence-peddling
- Anti-money laundering and combating the financing of terrorism
- GDPR fundamentals
- Managing conflicts of interest

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. Compliance Intranet of Mobilize Financial Services

Among the other action aimed at disseminating and promoting the compliance culture within Mobilize Financial Services, the Group Compliance Department launched its compliance intranet in December 2020.

This medium makes it possible to communicate on news and updates and to share the essential information that each Mobilize Financial Services employee has to know (Ethics Charter, procedures and deployment kit, conflict-of-interest declaration forms, link to the Professional Alert / Whistleblowing mechanism, communication campaigns, registry of gifts and invitations etc.).

c. Compliance communication plan

In coordination with the Human Resources/Communication team, in order to continue to raise awareness for compliance matters and reinforce synergies between the compliance function and all of the enterprise's other functions and business lines, a dedicated communication plan has been built up.

The main actions are:

- Presentations by the Group Compliance Officer at the CEO forum
- Sharing of good practice and identifying paths for improvement thanks to the community of Compliance Champions
- Regular communications on compliance topics in various formats (newsletters, quizzes, events)
- Intervention of the Compliance function at "business line" committees held with the countries
- External communication on the Group Compliance policy on the Mobilize Financial Services institutional website and in the annual report.