

How to report fraud and misconduct?

The [law of 16 May 2023](#) (the “Law”) implements Directive (EU) 2019/1937 of the Parliament and of the Council of 23 October 2019 into Luxembourg law which aims to protect of persons who report breaches such as corruption, fraud or violations of the law.

Banque de Commerce et de Placements S.A., succursale de Luxembourg («The Branch») is committed to provide an internal reporting channel and procedure in order to give the opportunity to report misconduct and breaches (“The report”) of the regulation.

The Branch is committed to provide enhanced protection measures for whistleblowers (e.g. keep the identity confidentially and protect the whistleblower who report irregularities from any retaliation).

Whistleblowers are requested to consider to first use this internal channel described below before using any external channels.

1. What do we mean by whistleblowing?

‘Whistleblowing’ consists of the reporting by any staff member or third parties of any Unacceptable Conduct within the Bank context such as information about violations, including reasonable suspicion of actual or potential violations that have occurred, are occurring or are very likely to occur in his/her work environment.

Whistleblowing is an important means of exposing bribery and corruption, fraud, illegal or unethical conduct, unlawful business activities or other misconduct etc. in order to avoid serious repercussions on the Company’s business or to eliminate the Company’s liability and enable the Company to prevent and correct it in a timely manner. It helps protect the Company as a whole.

2. Who can file a whistleblowing report?

Any person, and in particular all staff member at all levels or former ones and any concerned third parties may in good faith submit a report including fact known to them or to express their reasonable concerns or suspicions.

3. What protection is provided to the whistleblower?

The identity of the whistleblower and any third parties mentioned must be kept strictly confidential.

In addition, the identity of both the whistleblower and any third party mentioned is protected. This also applies to relatives, or spouses of the persons mentioned.

The reporting persons are protected from dismissal, demotion or and other discrimination as well as from retaliation (e.g. suspension, termination of contract, dismissal or equivalent measures...).



4. How do I report a misconduct?

The Branch's whistleblowing policy provides staff members and third parties the opportunity to file a whistleblower report using a dedicated channel as described below. Whistleblowing reports are handled confidentially by the Compliance department and in accordance with applicable regulation. Please note that you can remain anonymous when submitting a report.

Whistleblowers can file the Report in writing by:

1. Sending a letter marked "Confidential" to the attention of the Compliance department and/or Branch Manager of the Branch: 140, boulevard de la Pétrusse L-2330 Luxembourg and/or to the Head of Legal and Compliance department at the Head Office: 1, Rue de la Fontaine CH-1211 Geneva 3
2. Send an email marked "Confidential" to the Branch's Compliance department (Whistleblowing_LUX@bcp-bank.com) or Head Office's Compliance division (Compliance@bcp-bank.com)
3. Call the phone line of the Chief Compliance Officer (+352 40 40 22 39) and/or Branch Manager (+352 40 40 22 31)

Or

4. In a physical meeting

Please describe the facts as precisely and detailed as possible.

In case of a written Report, an acknowledgment of the Report's receipt is made to the Whistleblower within 7 days together with a support if required during the process. The feedback entailing the actions taken or lack thereof is sent to the Whistleblower in principle within three months from the date of the initial notification. In case this is not possible and the appropriate follow-up is still being determined, the Whistleblower will be informed about this and about any further feedback to expect.

Alternatively, the Whistleblower may use an external reporting channel by contacting the relevant supervisory authority (CSSF) directly, in accordance with its specific rules.

In principle, the CSSF considers only written reports sent by e-mail to the following address: whistleblowing@cssf.lu.

Or by using the online form: <https://whistleblowing.apps.cssf.lu/index.html?language=en>

We recommend that you consult the information on the CSSF's website ([Whistleblower protection – CSSF](#)) before using this external channel.