
WHISTLEBLOWING REPORT MANAGEMENT

USER MANUAL

RECIPIENTS:

Referents and Groups tool (BKMS) users

V17 – 05/03/2021

Major changes from previous version:

4.2 Identification

GENERAL PLAN

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GLOSSARY

Alert Management Committee:

The alert management Committee, *ad hoc* instance operating in “crisis cell” mode, supports the Referent to provide a transversal expertise for the assessment of the admissibility and the treatment of the whistle blower’s reports and allow a collegial decision-making on the follow-up to be given to them. The alert management Committee is comprised of the Compliance manager Referent, Human resources, Legal, Risk, Intern Audit, Secretary-General (...).

Delay of treatment:

The regulations indicate that the alert must be processed within a "reasonable" time that we estimate at two months, in order to remain compatible with Article L 1332-4 of the French Labour Code:

"No fault may give rise to only after disciplinary action has been taken beyond a period of two months from the date on which the employer became aware of it, unless this fact gave rise to prosecution within the same period criminal."

Confidentiality commitment:

In case of need, the referent can solicit the people’s opinion (professional experts for example) to intervene within the framework of the alert’s instruction. The punctual delegates sign a confidentiality agreement.

Examiner:

The examiner is in charge of operational processing reports. There are two profiles: supervisor profile and analyst profile.

Authorization page

Each entity, wishing to authorize an employee to use the Group tool (BKMS) uses the authorization request form (cf Appendix 2) and sends it to the FLGE referent for validation.

The FLGE referent, after validation and signature, sends the document to Crédit Agricole SA – Compliance Department for opening rights in the group toll (BKMS) specifying the profile (analyst or

supervisor) and the scope (single entity or FLGE). Any authorized collaborator signs the confidentiality agreement on the back of the authorization application.

FLGE:

First Level Group Entity

Analyst profile:

Person designated by the referent and authorized to the BKMS tool, who analyzes and proposes the closing of the file.

Supervisor profile:

Person designated by the referent and authorized to the BKMS tool, who analyzes the file's closing on the proposal of an analyst. This person may in case of need, and according to the organization, which is chosen by the entity or the FLGE, be the referent or the delegated Referent.

Report:

This term describes an alert which is reported with the tool BKMS.

Referent:

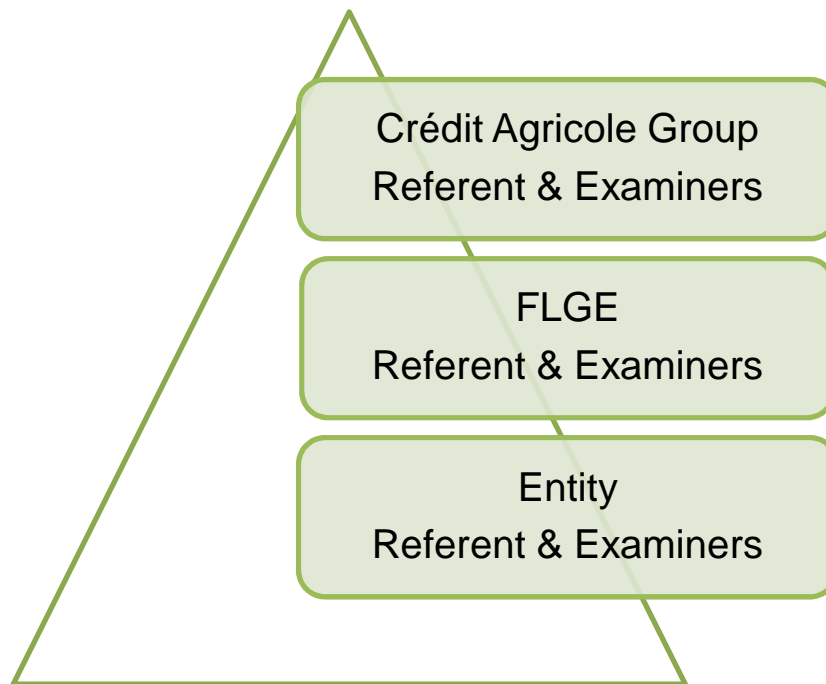
The referent ensures that the system is launched within his scope (Group, FLGE, entity) and that is functioning properly, and that the reports are processed before the deadline. If necessary, according the organization, which is chosen by the entity or the FLGE, this person can be authorize to the BKMS tool.

1 INTRODUCTION

Any employee, who cannot report facts that may constitute a dysfunction according to the incident reporting procedure, is entitled to exercise his whistleblowing right. In particular, with respect to the seriousness of the dysfunction, or when pressure is exerted upon them, which is likely to lead to the occurrence of a dysfunction.

The exercise of the whistle-blowing right, makes it possible to report, in a disinterested manner and in good faith; facts that may characterize a crime, an offence, a serious and manifest violation of an international convention, law or regulation, a threat or a serious prejudice to the general interest, a failure to comply with the regulatory obligations, a situation or behaviour contrary to the Anti-corruption Code of Conduct, or a serious breach of human rights and fundamental freedoms, health, safety of persons or the environment, of which the whistle-blower (a natural person) has personal knowledge.

2 ROLES AND RESPONSIBILITIES



(*) FLGE: First Level Group Entity

2.1 Role and responsibilities of the Group Credit Agricole

Status:

- The General Management appoints the Group Referent, and the Group Compliance Manager
- The Group Referent appoints a back up to ensure the continuity of the reports processing during his absence.
- The Group Referent appoints a delegate Group Referent who acts on his behalf in the operational follow-up of reports processing.
- The delegate Group Referent appoints the examiner(s) who is/are in charge of alerts processing.

Role:

- The Group Referent ensures the deployment of the device within the scope of Credit Agricole Group, and its proper functioning.
- He has a global vision on all the reports handled within the Group.

Responsibilities:

-
- In case of complex situations, the Group Referent may be contacted by the FLGE or entities referent in order to ask his support in the report handling. The whistle blower who works in the concerned entity may call him in the concerned entity.
 - If necessary, he may seek the opinion of people (business experts for example) to intervene as part of the processing of the report (occasional delegate) and request them to sign a confidentiality commitment (See appendix 1).
 - If necessary, he may request the opinion of the Whistleblowing Management Committee (See 2.5).
 - He appoints persons in charge of the administration of the tool (user's authorizations).

2.2 Role and responsibilities of the FLGE referent

Status:

- The General Management appoints the FLGE Referent (Director General, Deputy Director-General, Delegated Director-General, or a member of the Management Committee).
- The FLGE referent appoints a back up to ensure the continuity of the files processing during his absence.
- The FLGE referent may appoints a delegate referent who acts on his behalf in the operational follow-up of the alerts processing.
- The FLGE referent (or delegate) appoints the examiner(s) who is/are in charge of the alerts processing.

Role:

- The FLGE referent ensures the deployment and the proper functioning of the device on the FLGE scope.
- He has a global vision on all the alerts handled within the FLGE scope.
- The FLGE referent is responsible of the managing of the alerts processing within the FLGE scope.

Responsibilities:

- He ensures that alerts are processed before the deadline.
- In case of complex situation, the FLGE referent can be contacted by the entity referents in order to provide support in the alert processing. He can also be directly called by a whistle-blower working in the concerned entity.
- If necessary, he may ask the advice of people (business experts for example) to intervene as part of the processing of the alert (occasional delegate), and request them to sign a confidentiality commitment (See appendix 1).

-
- If necessary, he may request the opinion of the Whistleblowing Management Committee (See 2.5).
 - He validates and transmits to Credit Agricole SA the BKMS's authorization requests sent to him by the entities (See Appendix 2).
 - If there is an authorization's request with a supervisor profile, he validates the closure decisions proposed by the entities within his scope.

2.3 Role and responsibilities of the Entity Referent

Status:

- The General Management appoints the referent (Director General, Deputy Director-General, Delegated Director-General, or a member of the Management Committee).
- The referent appoints a back up to ensure the continuity of files processing during his absence.
- If necessary, the referent can appoints a delegate referent who acts on his behalf in the operational follow-up of the alerts processing.
- The referent (or delegate) appoints the examiner(s) who is/are in charge of processing the alerts.

Role:

- The entity's referent is responsible of the alerts processing relatives to his entity.
- He submits the closure of the alert that he has previously handled to the FLGE referent for decision. (enable closure)

Responsibilities:

- In case of complex situations, he can ask the FLGE's support in the alerts processing.
- If necessary, he may ask the advice of people (business experts for example) to intervene as part of the alerts processing (occasional delegate), and request them to sign a confidentiality commitment (See appendix 1).
- If necessary, he may request the opinion of the Whistleblowing Management Committee (See 2.5).
- He may designates by delegation the persons in charge of the operational alerts processing (examiner).
- He transmits to the FLGE referent the authorization's request of the entity. (See Appendix 2)

2.4 Role and responsibilities of the Examiner

The examiner is the person in charge of the operational alerts processing.

Status:

- The examiner is appointed by the referent (Group, FLGE, and Entity).
- There is two profiles of examiner: Supervisor and Analyst.
- The referent appoints two back up (supervisor and analyst) to ensure the continuity of the files processing during his absence.

Role:

- The Examiners are in charge to instruct the alert handling and to inform the Referent.
- In compliance with the two eyes principle (four eyes principle), the alerts are processed and closed by two different examiners with a different profile.
- The Analyst examines the file and propose the closure.
- The Supervisor examines the file and closures the file based on a proposal from an analyst.
- The Examiner signs the confidentiality commitment on the back of the authorization.

Responsibilities:

- The Examiner ensures that the alerts are processed before the deadline (2 months).
- He proposes a closure (analyst profile) or closes the file (supervisor profile).
- He undertakes to respect the rules of confidentiality as part of the alerts processing.

2.5 Role and responsibilities of the Whistleblowing Management Committee

Role:

- Each referent (Group, FLGE, entity) has the possibility to create a Whistleblowing Management Committee.
- It is composed of representative functionaries from the HR, Audit, Risk, Legal and Compliance functions.
- If the entity is too small to have a Whistleblowing Management Committee, the referent may escalate the report to the FLGE Whistleblowing Management Committee.
- The members of this Committee are appointed on the proposal of the referent (Group, FLGE, entity) and must sign a confidentiality agreement (See Appendix 1).
- If necessary, the Whistleblowing Management Committee can seek the advice of people (business experts for example) to intervene as part of the processing of the report (occasional delegate).

Responsibilities:

- This committee's mission is to assist the referent and to validate in a consensual way the decision taken, notably on the follow-up given to the report.
- Whenever necessary, the referent in charge of processing a report, may request the advisory of the Whistleblowing Management Committee.

2.6 Organizational proposal according to the size of the entity

Entity without a subsidiary:

- Appointment of an Entity Referent + Examiners (+back up).
- The alerts are supported at the entity level.

Entity (FLGE) with small subsidiaries (no or few employees):

- Appointment of an FLGE Referent + FLGE Examiners (+ back up).
- The alerts concerning the subsidiaries are supported at the FLGE level.

Entity (FLGE) with medium subsidiaries (a few dozen employees):

- Appointment of an FLGE Referent + FLGE Examiners (+ back up) + subsidiary Examiners (+ back up) with analyst profile.
- The alerts concerning the subsidiaries are supported at the local level (analysis and processing) and are closed at the FLGE level.

Entity (FLGE) with considerable subsidiaries (several hundred employees):

- Appointment of an FLGE Referent + subsidiary Referent + FLGE Examiners (+ back up) + subsidiary examiners (+ back up) with analyst and supervisor profile.
- The alerts concerning the subsidiaries are supported (analysis and processing) and are closed at the local level.
- The FLGE Referent supervises the alerts processing on the whole PSC.

2.7 Role and responsibilities of the persons designated to take part in the investigation of the report – Occasional delegates

If necessary, the referent can seek the opinion of people (business experts for example) to intervene within the framework of the instruction of the report.

The occasional delegates sign an agreement of confidentiality (See Appendix 1).

2.8 Principles of confidentiality

2.8.1 Whistle-blower protection

The whistle-blower must benefit from an environment of strict confidentiality that allows him to expose the facts while protecting his identity.

Consequently, the referent processes the reports in the strictest confidentiality, and shares them only with concerned parties whose involvement is necessary for the processing of the report.

This includes the Whistleblowing Management Committee and a team of identified investigators and experts, who are subject to the strictest confidentiality. Each involved person sign a confidentiality commitment (See Appendix 1).

In any event, the identity of the whistle-blower and of the concerned persons as well as the information collected by all the recipients of the report must remain confidential.

🚨 **Warning:** Criminal and civil sanctions are provided in case of disclosure of identities or unveiled facts.

2.8.2 Protection of the persons targeted by the report

The person in charge of the operational processing of the report:

- Ensures the soundness of the alert before any actions are taken with the concerned/ targeted person by the report.
- Depending on the circumstances, the concerned/targeted person could be informed. However, precautionary measures may be taken when:
 - ✓ The identity of the whistle-blower cannot be protected.
 - ✓ There is a risk of evidence destruction.
- He makes sure that the person targeted by an alert signs an agreement of confidentiality (See Appendix 1).

🚨 **SPECIAL CASE:** if the person targeted by the report is the referent himself (or the examiner), he must transfer the processing of the file to a third person of his entity or higher organizational level.

3 SYSTEM

The “Whistleblowing system” does not replace the “**dysfunction report system**”. These two devices are parallel and complement each other.

The notion of dysfunction covers any incident or anomaly that may occur in the effective implementation of the obligations applicable to banking and financial activities, whether they are of a legislative or regulatory nature or whether they concern professional and ethical standards or instructions from the executive body taken in particular in application of the guidelines of the deliberative body.

As soon as an employee notices the occurrence of a dysfunction in the Compliance area, he must inform his line manager (product line, customers or central functions), by means of his choice, verbal or written.

If this is not possible (line manager involved, for example), the employee has the option of using the whistleblowing system.

3.1 Typology of reports

- Crime;
- Serious and manifest violation of:

An international commitment/convention, a unilateral act of an international organization taken based on a duly ratified international commitment, a law or of a regulation.

- Threat or serious prejudice to the public interest;
- Failure to comply with the obligations defined by European regulations and by French regulations and regulators;
- Conduct or situation contrary to the Anti-corruption code of conduct of the Group;
- A serious infringement of human rights and fundamental freedoms, the health and safety of persons or the environment; resulting from the Group's activities as well as from the activities of subcontractors or suppliers with whom an established commercial relationship is maintained, when these activities are linked to this relationship.

EXCLUSIONS: The whistle-blower may not report facts, information or documents, whatever their form or support, covered by national defence secrecy, medical secrecy or the secrecy of relations between a lawyer and his client.

3.2 Potential whistle-blower

| | |
|----------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Employees | All employees on permanent contracts, employees on fixed-term contracts, apprentices, alternates and interns. |
| External and occasional employees | Employees of suppliers who are present on the company's site and whose nature and duration of their assignment require in-depth knowledge of the operation of the company and/or the Group in which they carry out their assignments. |
| Subcontractors and suppliers with whom the Group has established commercial relations | Business relationship of the company and / or the Group with a supplier and its subcontractors involving a steady and usual business flow. |

🔗: The scope of potential whistleblowers implies that the link:

<https://www.bkms-system.com/bkwebanon/report/clientInfo?cin=3CAgr18&language=fre>

Is available not only on the intranet of the entity but also on the website so that it is accessible from outside the company.

3.3 Scope of the entities involved

The scope of the entities covered by the framework is equivalent to the scope of the companies supervised on a consolidated basis (PSC) and includes:

- The consolidation of the accountability perimeter of the Crédit Agricole Group, including the parent company and entities under exclusive control, joint ventures and associated companies.
- Any non-consolidated entity for which the Crédit Agricole Group entity is shareholder and which the CCI/CCIG expressly decides to include in the PSC, in particular because of a significant reputational risk to which the entity exposes the Group.

4 PROCESSING OF A REPORT

4.1 Report reception

When the whistle-blower submits an alert in BKMS system, the relevant examiner receives an email to inform him that a new report has been created.

Below are the links allowing Crédit Agricole Group examiners to access the home page to process an alert:

English: <https://client.bkms-system.com/bkwebanon/action/client/clientDisclaimer.do?language=eng>

French: <https://client.bkms-system.com/bkwebanon/action/client/clientDisclaimer.do?language=fre>

4.2 Identification

4.2.1 Client Login

The access data for Client Login consist of a name and a password and are identical for all the users of any given client access. Pay attention to upper and lower case usage when entering characters. After six failed login attempts, your account will be locked for a certain time.

1 CLIENT LOGIN 2 USER LOGIN

Client Login

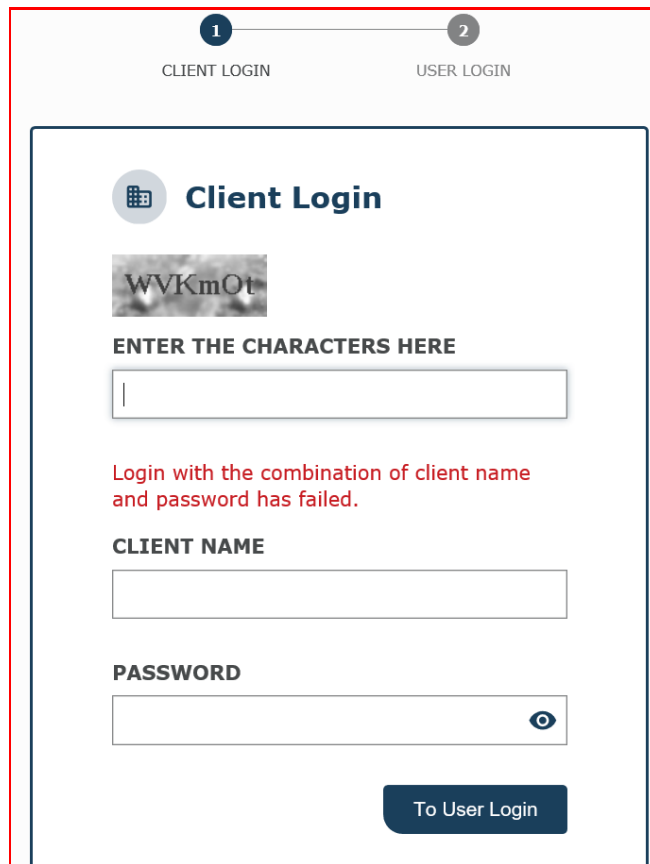
CLIENT NAME

PASSWORD

To User Login

If SSO has been set up, you will be directed to the Main Menu after the Client Login.

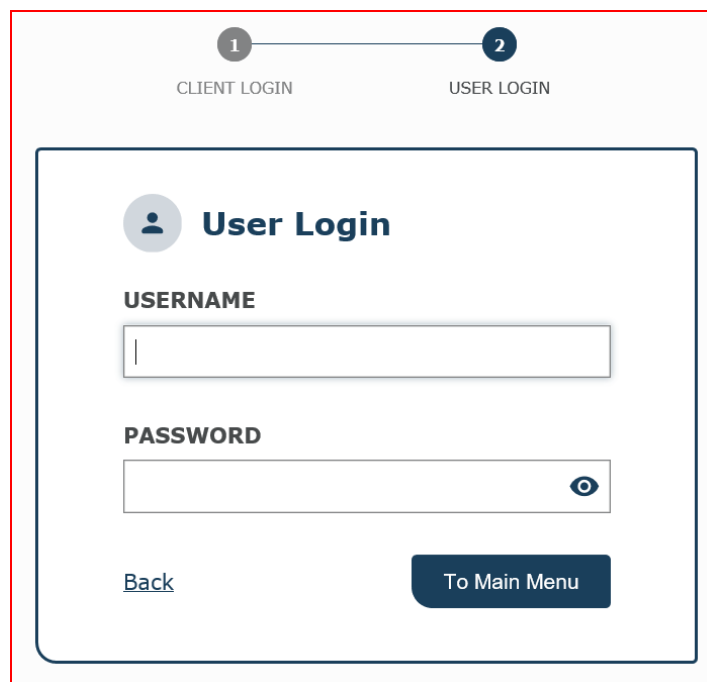
In the event of an input error, you will be asked to enter the security captcha :



The screenshot shows a login interface with two tabs: 'CLIENT LOGIN' (active, marked with a '1') and 'USER LOGIN' (marked with a '2'). The main content area is titled 'Client Login' and features a captcha image with the characters 'WVKmOt'. Below the image is a text input field labeled 'ENTER THE CHARACTERS HERE'. A red error message states: 'Login with the combination of client name and password has failed.' Below this are input fields for 'CLIENT NAME' and 'PASSWORD' (with a toggle icon). A 'To User Login' button is at the bottom right.

4.2.2 User Login

The access data for User Login consists of a personalized name and a password. Pay attention to upper case and lower case usage when entering characters. After six failed login attempts, your account will be locked for a certain time.



The screenshot shows a login interface with two tabs: 'CLIENT LOGIN' (marked with a '1') and 'USER LOGIN' (active, marked with a '2'). The main content area is titled 'User Login' and features input fields for 'USERNAME' and 'PASSWORD' (with a toggle icon). A 'Back' link is on the left, and a 'To Main Menu' button is on the right.

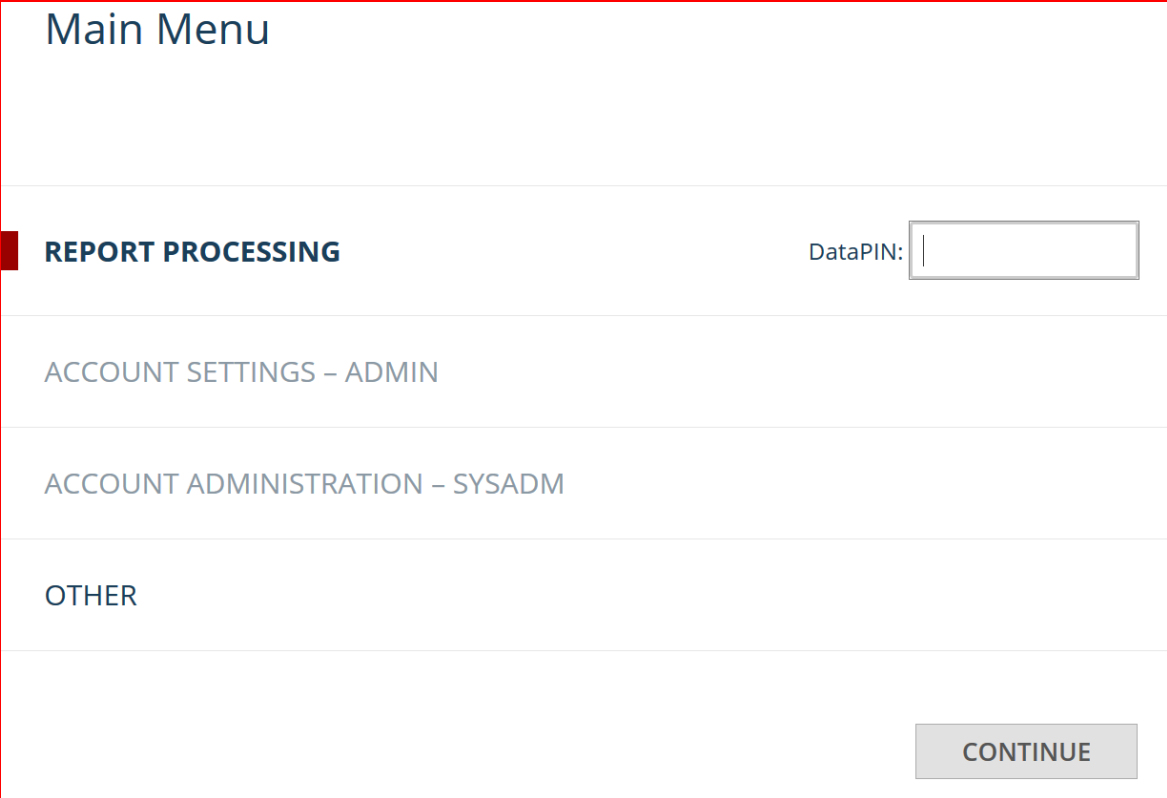
Your system administrator initially creates your access data. After logging in to the BKMS® System for the first time, you will be automatically asked to change your password. If you forget your user login password, the system administrator can reset your password; you can get in touch with your system administrator at the email address: admin.ethicalerts@credit-agricole-sa.fr.

Warning: Be careful, your login information is personal and must not be provided to a third party under any circumstance. No one will ever ask you to provide it.

If in doubt, request a reset at admin.ethicalerts@credit-agricole-sa.fr

4.2.3 PIN code connection

The examiner chooses “Report Processing” (automatically) and enter his Data PIN.




The screenshot shows a web interface titled "Main Menu". The menu items are: "REPORT PROCESSING" (highlighted with a red bar), "ACCOUNT SETTINGS - ADMIN", "ACCOUNT ADMINISTRATION - SYSADM", and "OTHER". To the right of the "REPORT PROCESSING" option is a "DataPIN:" label followed by an empty input field. At the bottom right of the menu area is a "CONTINUE" button.

4.3 Overview Report

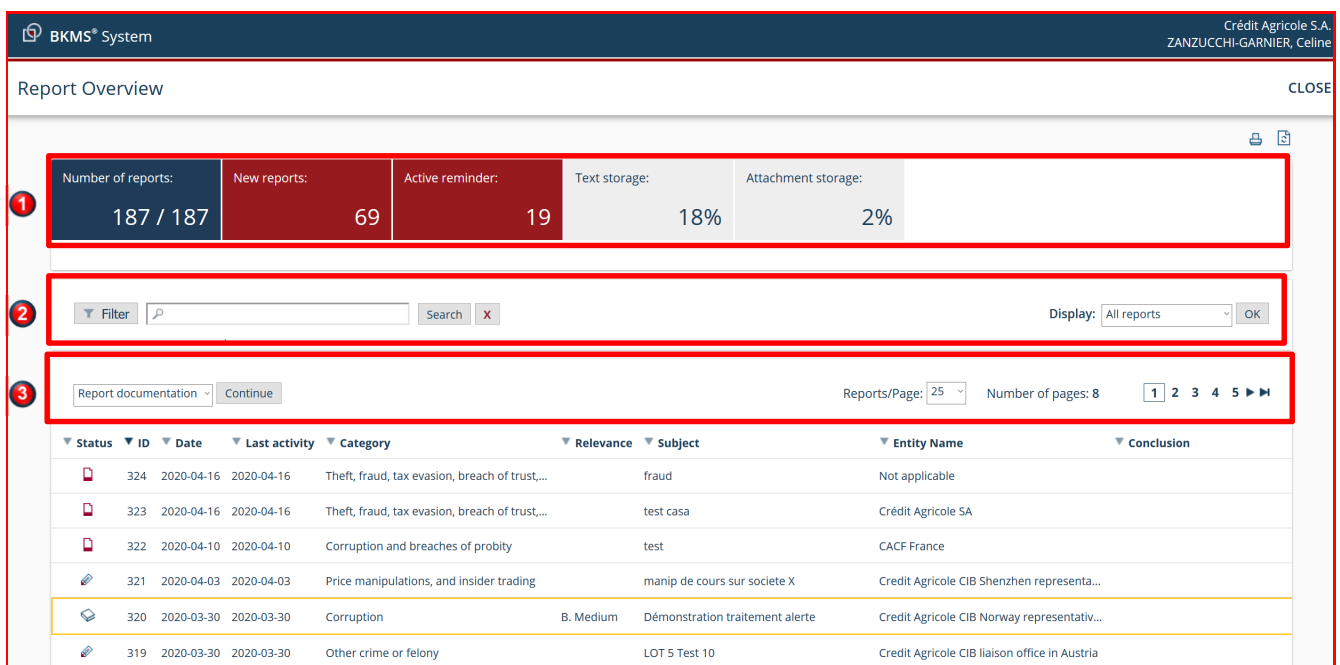
The examiner accesses to the “report review” and select the report he wants to process.

He receives an overview aligned with the rights specific to categories and processing functions that pertain to reports and their most important criteria:

- Status
- ID: Chronological Report Number
- Date: Date of receipt in the format Year-Month-Day
- Category

- Relevance
- Subject
- Group Entity
- Entity Name
- Reminder : Date in the format Year-Month-Day
-  : Attachment
- Source Selection
- PBox: An identifier showing if the whistle-blower has created a post-box
- Language
- Assignment : Alias of the examiner in charge of the file

In the "Alert Overview" table, only the first 2 alerts are shown but you can change the number of alerts displayed.









Report Overview

Crédit Agricole S.A.
ZANZUCCHI-GARNIER, Celine

Number of reports: 187 / 187 New reports: 69 Active reminder: 19 Text storage: 18% Attachment storage: 2%

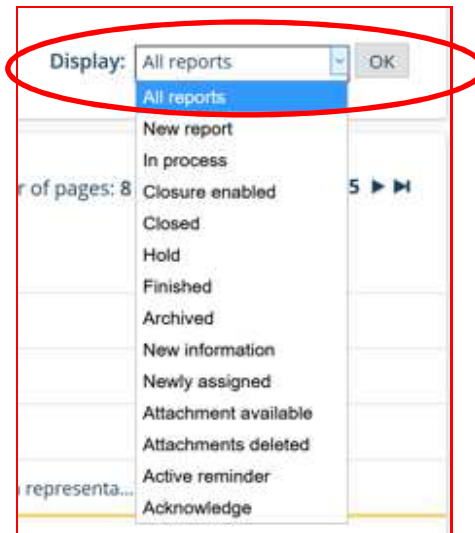
Filter [] Search [X] Display: All reports [v] OK

Report documentation [v] Continue Reports/Page: 25 Number of pages: 8 1 2 3 4 5 [▶▶]

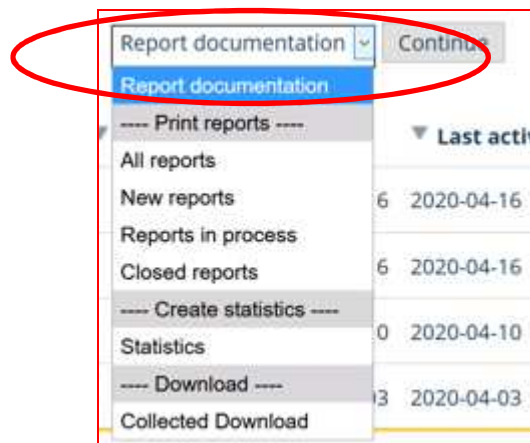
| Status | ID | Date | Last activity | Category | Relevance | Subject | Entity Name | Conclusion |
|-------------------------------------------------------------------------------------|-----|------------|---------------|------------------------------------------------|-----------|---------------------------------|-----------------------------------------------|------------|
|  | 324 | 2020-04-16 | 2020-04-16 | Theft, fraud, tax evasion, breach of trust,... | | fraud | Not applicable | |
|  | 323 | 2020-04-16 | 2020-04-16 | Theft, fraud, tax evasion, breach of trust,... | | test casa | Crédit Agricole SA | |
|  | 322 | 2020-04-10 | 2020-04-10 | Corruption and breaches of probity | | test | CACF France | |
|  | 321 | 2020-04-03 | 2020-04-03 | Price manipulations, and insider trading | | manip de cours sur societe X | Credit Agricole CIB Shenzhen representa... | |
|  | 320 | 2020-03-30 | 2020-03-30 | Corruption | B. Medium | Démonstration traitement alerte | Credit Agricole CIB Norway representativ... | |
|  | 319 | 2020-03-30 | 2020-03-30 | Other crime or felony | | LOT 5 Test 10 | Credit Agricole CIB liaison office in Austria | |

- 1** The first header:
- The total number of reports (displayed/overall)
 - The number of new reports
 - The number of current reminders
 - The assignment of storage space specific to report memory and attachment memory

- 2** The second header:
- A search box with a "Filter" button to refine the search (see 4.4.1).
 - The drop-down option "Display" allows you to filter Overview Reports according to status. For instance, by selecting "closed", you can display only those alerts that are closed.



- 3 • The "Alert documentation" drop-down menu allows the extraction of alerts by status, and provides access to the "reporting" function (see 4.7.5.).
- The number of pages in: Overview Reports
- The "Alerts/Page" drop-down option: allows you to choose the number of alerts you wish to display per page



By clicking the column title in the grey shaded header, the Overview can be sorted in ascending or descending sequence for each column of the table.

4.3.1 Search Function

You can use the Search function to search Overview Reports by keywords. The filter determines which columns are shown. Enter your search term(s) in the text box. The case used is irrelevant. Click on the button to remove the filter and clear the search.

Please note: the only visible texts are the ones contained in the overview, not in the actual text of the report.

- Simple search

Enter a search term

Example: breach of trust → result: All reports containing the term "breach of trust" are displayed.

- “Or” search

Enter multiple search terms, separated by a space

Example: breach of trust corruption → result: All reports containing either the term “breach of trust” or the term “corruption” are displayed.

- “And” search

Enter multiple search terms, separated by a space and a plus sign

Example: breach of trust +corruption → result: All reports containing both the term “breach of trust” and the term “corruption” are displayed.

- Search by a phrase

Enter a phrase with enclosed with quotes

Example: “faulty accounting” → result: All reports containing the precise phrase “faulty accounting” are displayed.

- Omission of search terms

Enter a search term preceded by a minus sign

Example: - breach of trust → result: All reports are displayed other than reports containing the term “breach of trust”.

- Combining search options

A space must be inserted after each search term in order to maintain the functionalities of the search function.

Example: breach of trust corruption +“erroneous accounting” - corruption report → result: All reports containing the terms “breach of trust” or “corruption” in addition to the phrase “erroneous accounting” are displayed, but the term corruption report is not displayed.

4.3.2 Legend



New Report: A new report has arrived.



Newly Assigned: The report has been newly assigned.



In Process: The report has been opened.



Hold: The report can only be printed and downloaded, and an internal comment can be added.



Closure Enabled: An Examiner (analyst profile) has released the report for closure.



Clos: The Examiner (examiner profile) has closed the report. This report can no longer be edited.



Attachment Available: The report contains one or many attachments.



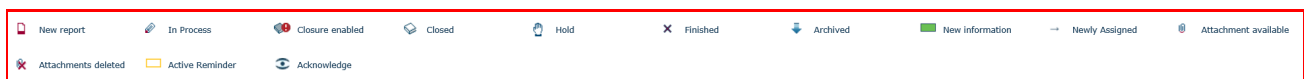
Attachments Deleted: All attachments accompanying a report were deleted.



New Information: The status field is shaded green if new information on this report has been received from the whistle-blower (answer or addition).




Active Reminder: Alerts for which an active reminder has been programmed are circled in yellow.



4.3.3 Edit Report

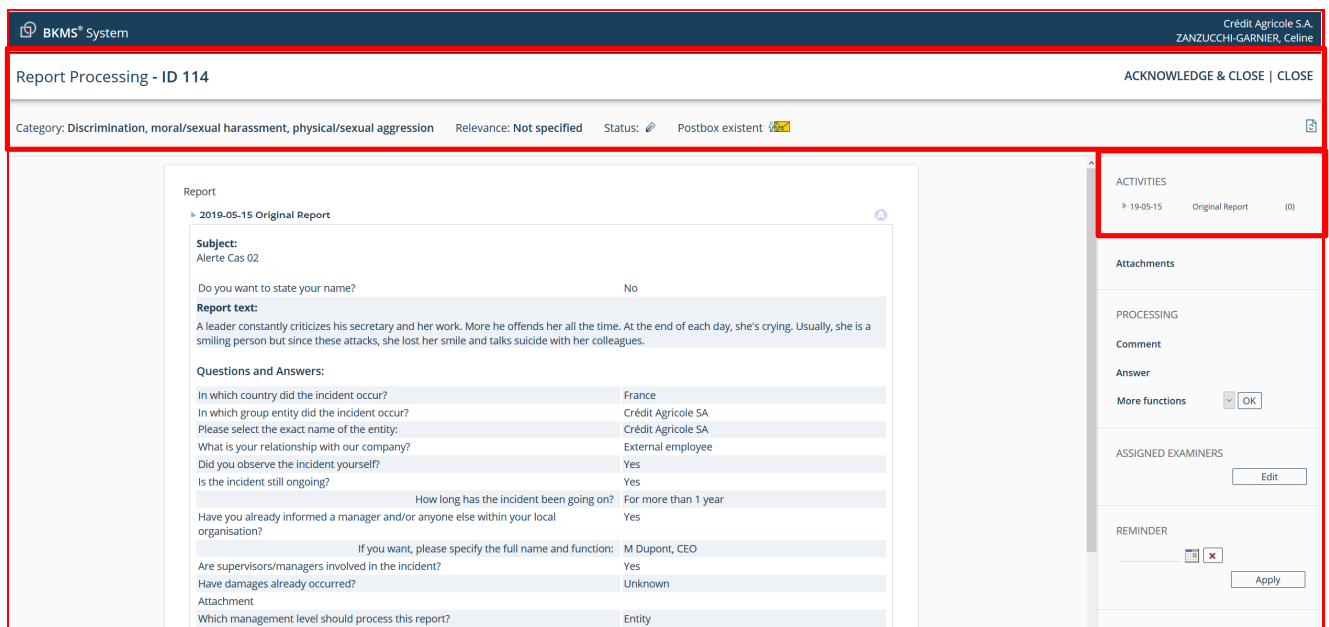
To access the contents of an alert, click on the corresponding line.

The Refresh symbol  is located in the upper right-hand corner of the report view. The report view is divided into different zones:

- The current category
- Current Relevance
- The "mailbox" symbol (if the whistleblower has created a mailbox)
- Alert ID
- Status: A symbol indicating its status.
- Content of the alert

Right margin

- Activities: summary log of the actions carried out in the processing of the alert
- Treatment
- Assigned Examiner
- Reminder
- Reporting
- Archiving



The screenshot displays the 'Report Processing - ID 114' interface. The top navigation bar includes 'BKMS System' and user information 'Crédit Agricole S.A. ZANZUCCHI-GARNIER, Celine'. The report details show a category of 'Discrimination, moral/sexual harassment, physical/sexual aggression', relevance 'Not specified', and status 'Postbox existent'. The main report content includes a subject 'Alerte Cas 02', a report text describing a leader's behavior, and a series of questions and answers regarding the incident's details. The right-hand sidebar is divided into sections: 'ACTIVITIES' (showing a log for 19-05-15), 'Attachments', 'PROCESSING' (with a comment field), 'ASSIGNED EXAMINERS' (with an 'Edit' button), and 'REMINDER' (with an 'Apply' button).

In a second part, under the description of the alert, all the comments related to the actions of the Examiner are classified by date of creation and are chronologically numbered. The Examiner's pseudonym is indicated for each action.

A green check mark indicates if the whistleblower has taken note of your response: 

Report Processing - ID 114

Category: Discrimination Relevance: B. Medium Status: Postbox existent

Report

2019-05-15 Original Report

Category: Discrimination, moral/sexual harassment, physical/sexual aggression

Subject: Alerte Cas 02

Do you want to state your name? No

Report text: A leader constantly criticizes his secretary and her work. More he offends her all the time. At the end of each day, she's crying. Usually, she is a smiling person but since these attacks, she lost her smile and talks suicide with her colleagues.

Questions and Answers:

In which country did the incident occur? France

In which group entity did the incident occur? Crédit Agricole SA

Please select the exact name of the entity: Crédit Agricole SA

What is your relationship with our company? External employee

Did you observe the incident yourself? Yes

Is the incident still ongoing? Yes

How long has the incident been going on? For more than 1 year

Have you already informed a manager and/or anyone else within your local organisation? Yes

If you want, please specify the full name and function: M Dupont, CEO

Are supervisors/managers involved in the incident? Yes

Have damages already occurred? Unknown

Attachment

Which management level should process this report? Entity

2020-04-21 Category (ZANCE) (1)

The category has been changed - System Confirmation

old: Discrimination, moral/sexual harassment, physical/sexual aggression

new: Discrimination

discrimination

2020-04-21 Relevance (ZANCE) (2)

Relevance has been changed - System Confirmation

old: Not specified

new: B. Medium

Medium

2020-04-21 Answer (ZANCE) (3)

Answer

ASSIGNED EXAMINERS

ZANCE Edit

4.4 Alert processing

4.5.1. Alert assignment (“Assignment”)

The assignment process is necessary in order to confirm that someone will be processing the report and to know who is in charge.

To assign a report, please select the ‘Edit’ button.

Report Processing - ID 114

Category: Discrimination, moral/sexual harassment, physical/sexual aggression Relevance: Not specified Status: Postbox existent

Report

2019-05-15 Original Report

Subject: Alerte Cas 02

Do you want to state your name? No

Report text: A leader constantly criticizes his secretary and her work. More he offends her all the time. At the end of each day, she's crying. Usually, she is a smiling person but since these attacks, she lost her smile and talks suicide with her colleagues.

Questions and Answers:

In which country did the incident occur? France

In which group entity did the incident occur? Crédit Agricole SA

Please select the exact name of the entity: Crédit Agricole SA

What is your relationship with our company? External employee

Did you observe the incident yourself? Yes

Is the incident still ongoing? Yes

How long has the incident been going on? For more than 1 year

Have you already informed a manager and/or anyone else within your local organisation? Yes

If you want, please specify the full name and function: M Dupont, CEO

Are supervisors/managers involved in the incident? Yes

Have damages already occurred? Unknown

Attachment

Which management level should process this report? Entity

ASSIGNED EXAMINERS

Edit



BKMS[®] System Crédit Agricole S.A.
ZANZUCCHI-GARNIER, Celine

BACK | CLOSE

Assigned Examiners

| ID: | Date | Category | Subject |
|-----|------------|---------------------------------------------------------------------|---------------|
| 114 | 2019-05-15 | Discrimination, moral/sexual harassment, physical/sexual aggression | Alerte Gas 02 |

Please select the Examiners, to whom the report shall be manually assigned.

* Required field

| Name, First name | Alias | Assign | Responsible Examiner* |
|---------------------------|--------|-------------------------------------|----------------------------------|
| BENMAKHLOUF, Maïka | BENMA | <input type="checkbox"/> | <input type="radio"/> |
| CORTI, Michele | CORMI | <input type="checkbox"/> | <input type="radio"/> |
| DEL BLANCO, Laurie | BLALA | <input type="checkbox"/> | <input type="radio"/> |
| Examiner1, Examiner1 | E1 | <input type="checkbox"/> | <input type="radio"/> |
| FERRARI, Valentina | FERVA | <input type="checkbox"/> | <input type="radio"/> |
| GOYHENEIX, Xavier | GOYXA | <input type="checkbox"/> | <input type="radio"/> |
| HUSSET, Benoit | HUSBE | <input type="checkbox"/> | <input type="radio"/> |
| LAVENU, Francois | LAVFR | <input type="checkbox"/> | <input type="radio"/> |
| Plachta, Sophie | PLASO | <input type="checkbox"/> | <input type="radio"/> |
| Referent, View Assign | REFVA | <input type="checkbox"/> | <input type="radio"/> |
| Referent, Reader | REREAD | <input type="checkbox"/> | <input type="radio"/> |
| ReferentG, Groupe 1 | REFGR | <input type="checkbox"/> | <input type="radio"/> |
| ZANZUCCHI-GARNIER, Celine | ZANCE | <input checked="" type="checkbox"/> | <input checked="" type="radio"/> |
| ZHOU, Pierre | ZHOPI | <input type="checkbox"/> | <input type="radio"/> |

Cancel Save

The section titled “Assignment” in the report view displays the aliases of all the examiners assigned to this report.

ASSIGNED EXAMINERS

ZANCE

Edit

The assignment validation activates an e-mail that is sent to the assigned person. The alias of responsible examiner is displayed in boldface; s/he also receives an e-mail.

Coming back to ‘report overview’, the last column titled “Assignment” displays the aliases of all the Examiners assigned to this report.

The responsible Examiner’s Alias is displayed in boldface. A newly assigned report is shown on the ‘overview report screen’ right at the top for all Examiners assigned and is marked with the symbol →

BKMS® System Crédit Agricole S.A. ZANZUCCHI-GARNIER

Report Overview

| | | | | |
|--------------------|--------------|------------------|---------------|---------------------|
| Number of reports: | New reports: | Active reminder: | Text storage: | Attachment storage: |
| 4 / 187 | 69 | 19 | 18% | 2% |

Filter: [114 113 112 111] Search [X] Display: All reports [OK]

Report documentation [Continue] Reports/Page: 100 Number of pages: 1

| Status | ID | Date | Last activity | Category | Relevance | Subject | Entity Name | Conclusion | Reminder | Source | PBox | Language | Assignment |
|--------|-----|------------|---------------|-------------------------------------------------------|-----------|------------------|-------------------------------------------------|------------|------------|--------------|------|----------|------------|
| | 114 | 2019-05-15 | 2019-05-15 | Discrimination, moral/sexual harassment, physical/... | | Alerte Cas 02 | Crédit Agricole SA | | | BKMS®-Portal | X | eng | ZANCE |
| | 113 | 2019-05-15 | 2020-04-09 | Breach of trust | B. Medium | Alerte Cas 01 | Crédit Agricole CIB France | | 2020-04-30 | BKMS®-Portal | X | eng | ZANCE |
| | 112 | 2019-05-03 | 2019-05-03 | Corruption and breaches of probity | | vdfvasdcasasdcas | Not applicable | | | BKMS®-Portal | | por | |
| | 111 | 2019-05-03 | 2019-05-03 | Corruption and breaches of probity | | Test | CA Indosuez Wealth (Europe), Sucursal en Espana | | | BKMS®-Portal | | por | |

4.5.2. Category

The person in charge of the file verifies that the category selected by the whistleblower is correct, or, if not, modifies the category and notifies this in the text box.

In addition, the whistleblower has the possibility to select only one category among the eight and consequently, the reviewer must more clearly specify a sub-category (ex Category: theft, fraud, tax evasion, breach of trust, abuse of weakness; sub-category: Breach of trust).

BKMS® System Crédit Agricole S.A. ZANZUCCHI-GARNIER, Celine

Traitement des alertes - ID 113

CONNAISSANCE & FERMER | FERMER

Catégorie : Vol, fraude, fraude fiscale, abus de confiance, abus de faiblesse Pertinence: Pas d'information Statut: Boîte de dialogue disponible

Alerte

2019-05-15 Alerte originale

Objet :
Alerte Cas 01

Voulez-vous indiquer votre nom ? Oui Non
Prénom : Toto
Nom de famille : Titi

Texte du message d'alerte :
A new employee, who joined us 3 months ago, steal industrial secrets to send thump to a Chinese bank.

Questions et réponses :

Dans quel pays l'incident est-il survenu ? France
Dans quelle entité principale/groupe d'entités/holding l'incident est-il survenu ? CACIB
Merci de préciser le nom exact de l'entité dans laquelle l'incident est survenu : Crédit Agricole CIB France
Quelle est votre relation avec l'entreprise ? Collaborateur
Avez-vous été personnellement témoin de l'incident ? Oui
L'incident est-il encore en cours ? Oui
Depuis combien de temps l'incident dure-t-il ? Depuis 1 à 3 mois
Avez-vous déjà informé un responsable ou quelqu'un de votre entreprise ? Non
Des responsables/managers sont-ils impliqués dans l'incident ? Oui
Y a-t-il déjà eu des dommages ? Oui
Si possible, précisez la nature des dommages : Matériels

Annexes
L'alerte sera analysée au niveau : Entité

ACTIVITÉS

- 19-05-15 Alerte originale (0)
- 19-05-15 Complément d'information (1)
- 19-05-16 Commentaire (2)
- 19-05-16 Commentaire (3)

Annexes

TRAITEMENT

Commentaire

Réponse

Catégorie [v] [O]

Autres fonctions

Catégorie

Pertinence

Estimation

Informations supplémentaires

Confidentialité des données

Anonymisation

Restaurer l'original

En attente

Autoriser la clôture

Clôture

BKMS System Crédit Agricole S.A.
ZANZUCCHI-GARNIER, Céline

BACK | CLOSE

Report Processing

ID: 113

Activities

- 19-05-15 Original Report (0)
- 19-05-15 Addition (1)
- 19-05-16 Comment (2)
- 19-05-16 Comment (3)

Category: Theft, fraud, tax evasion, breach of trust, abuse of weakness

2019-05-15 Original Report

Subject: Alerte Cas 01

Do you want to state your name? Yes

First Name: Toto
Last Name: Tit

Report text:
A new employee, who joined us 3 months ago, steal industrial secrets to send thump to a Chinese bank.

Questions and Answers:

In which country did the incident occur? France
 In which group entity did the incident occur? CACIB
 Please select the exact name of the entity; Crédit Agricole CIB France
 What is your relationship with our company? Employee
 Did you observe the incident yourself? Yes
 Is the incident still ongoing? Yes
 How long has the incident been going on? For 1 - 3 months
 Have you already informed a manager and/or anyone else within your local organisation? No

Select the new category and enter your comment here.

Currently: Theft, fraud, tax evasion, breach of trust, abuse of weakness

New:

- Corruption and breaches of probity
- Abuse of corporate assets, illegal acquisitions of interest, conflict of interest
- Money laundering, breach of international sanctions
- Price manipulations, and insider trading
- Discrimination, moral/sexual harassment, physical/sexual aggression
- Non-Respect for human and environmental rights, serious threat or damage to public interest
- Other crime or felony
- Abuse of corporate assets
- Breach of trust
- Abuse of weakness
- Physical aggression
- Sexual aggression
- Sexual harassment
- Conflicts of interest
- Money laundering
- Insider trading
- Corruption
- Discrimination
- Fraud
- Tax evasion
- Moral harassment
- Sexual harassment
- Sexual aggression
- Data protection violation
- Market manipulations
- Serious threat or damage to public interest
- Non-Respect for human rights
- Non-Respect for environmental rights
- Anti-competitive/antitrust practice
- Illegal acquisitions of interest

Attachments

| File name | Download | Deleted |
|-----------------|----------|---------|
| Image1.JPG | | |
| test-ajout.xlsx | | |

Cancel | Save



Change Category - Text modules - Apply

Select the new category and enter your comment here.

Currently: Discrimination, moral/sexual harassment, physical/sexual aggression

New: Discrimination

Comment

You still have 4096 characters at your disposal.

Cancel | Save

No attachments existent

The selected "Category" is visible in the alert overview. It is possible to sort by category.

BKMS System Crédit Agricole S.A.
ZANZUCCHI-GARNIER, Céline

Report Overview

Number of reports: **4 / 187** New reports: **69** Active reminder: **19** Text storage: **18%** Attachment storage: **2%**

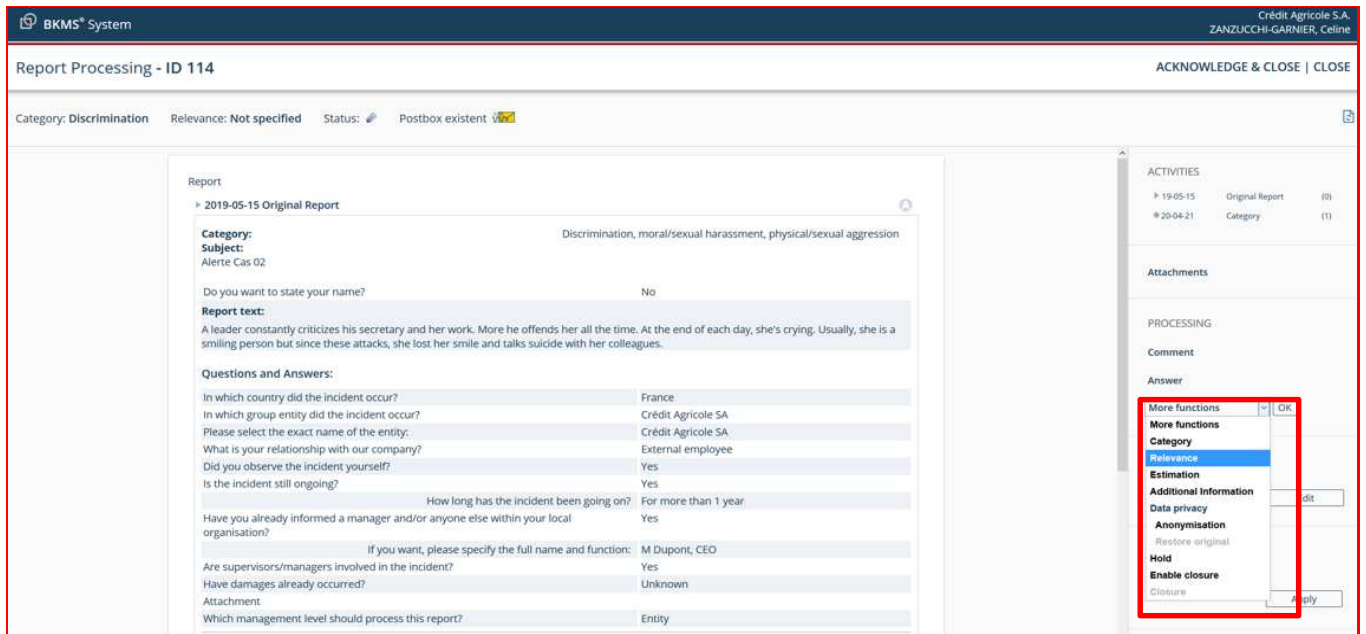
Filter: [114 113 112 111] Search X Display: All reports OK

Report documentation Continue Reports/Page: 100 Number of pages: 1

| Status | ID | Date | Last activity | Category | Relevance | Subject | Entity Name | Conclusion | Reminder | Source | PBox | Language | Assignment |
|--------|-----|------------|---------------|------------------------------------|-----------|------------------|-----------------------------------------------|------------|------------|--------------|------|----------|------------|
| | 114 | 2019-05-15 | 2020-04-21 | Discrimination | | Alerte Cas 02 | Crédit Agricole SA | | | BKMS@-Portal | X | eng | ZANCE |
| | 113 | 2019-05-15 | 2020-04-09 | Breach of trust | B. Medium | Alerte Cas 01 | Crédit Agricole CIB France | | 2020-04-30 | BKMS@-Portal | X | eng | ZANCE |
| | 112 | 2019-05-03 | 2019-05-03 | Corruption and breaches of probity | | vdvfasdcasasdcas | Not applicable | | | BKMS@-Portal | | por | |
| | 111 | 2019-05-03 | 2019-05-03 | Corruption and breaches of probity | | Test | CA Indosuez Wealth (Europe), Sucursal en E... | | | BKMS@-Portal | | por | |

4.5.3. Criticality assessment of the alert (“relevance”)

The examiner checks if the report is relevant, and if so, evaluates how critical the report is (high, medium, low). For example, a report that could compromise the image of the Crédit Agricole Group must be classified as "high".



In the case of inadmissibility, the Examiner informs the whistleblower of the alert (within 10 days at the latest) using, if he wants, the standard message "message of inadmissibility of an alert" (Cf. 4.5.4 response part).



The selected "relevance" is visible in the alert overview.

BKMS[®] System Crédit Agricole S.A
ZANZUCCHI-GARNIER, Celine

Vue d'ensemble des alertes FER

| | | | | |
|----------------------------------------|---------------------------------|-----------------------------|------------------------------|-----------------------------|
| Nombre d'alertes : 184 / 184 | Nouvelles alertes: 67 | Rappel actif : 19 | Mémoire des alertes : 18% | Mémoire des annexes : 2% |
|----------------------------------------|---------------------------------|-----------------------------|------------------------------|-----------------------------|

Filtre Rechercher Affichage : Toutes les alertes

Documentation de l'alerte Alertes/Page : 10 Nombre de pages : 19

| Statut | ID | Date | Dernière activité | Catégorie | Pertinence | Objet | Entity Name | Conclusion | Rappel | Source | PBox | Langue | Attribution |
|--------|-----|------------|-------------------|------------------------------------------------|------------|------------------|---------------------------------------------|------------|------------|--------------|------|--------|-------------|
| | 111 | 2019-05-03 | 2019-05-03 | Corruption et atteintes à la probité | | Test | CA Indosuez Wealth (Europe). Sucursal en... | | | BKMS@-Portal | | por | |
| | 112 | 2019-05-03 | 2019-05-03 | Corruption et atteintes à la probité | | vdfvasdcasdcasdc | Non précisé | | | BKMS@-Portal | | por | |
| | 113 | 2019-05-15 | 2020-04-09 | Abus de confiance | B. Moyenne | Alerte Cas 01 | Crédit Agricole CIB France | | 2020-04-30 | BKMS@-Portal | X | eng | ZANCE |
| | 114 | 2019-05-15 | 2019-05-15 | Discrimination, harcèlement moral/sexuel... | | Alerte Cas 02 | Crédit Agricole SA | | | BKMS@-Portal | X | eng | |
| | 115 | 2019-05-15 | 2019-05-15 | Manipulation de cours, délits d'initiés | | Alerte Cas 03 | Banco Crédit Agricole Brasil SA | | | BKMS@-Portal | X | eng | |
| | 116 | 2019-05-15 | 2019-05-15 | Vol, fraude, fraude fiscale, abus de confia... | | Alerte Cas 05 | Crédit Agricole CIB Dubai | | | BKMS@-Portal | | eng | |

4.5.4. Questions/Answers to the whistle-blower

During the investigation phase of the report, the examiner communicates with the whistleblower to get more details about the report.

The examiner can choose standard message or write it himself.

The dialogue with the whistleblower is encrypted and secure; Business Keeper AG has no access to this information.

BKMS[®] System Crédit Agricole S.A
ZANZUCCHI-GARNIER, Celine

Traitement des alertes - ID 113 CONNAISSANCE & FERMER | FERMER

Catégorie : Abus de confiance Pertinence : B. Moyenne Statut : Boîte de dialogue disponible

Alerte

» 2019-05-15 Alerte originale

Catégorie : Vol, fraude, fraude fiscale, abus de confiance, abus de faiblesse

Objet : Alerte Cas 01

Voulez-vous indiquer votre nom ? Oui

Prénom : Toto

Nom de famille : Titi

Texte du message d'alerte :

A new employee, who joined us 3 months ago, steal industrial secrets to send thump to a Chinese bank.

Questions et réponses :

Dans quel pays l'incident est-il survenu ? France

Dans quelle entité principale/groupe d'entités/holding l'incident est-il survenu ? CACIB

Merci de préciser le nom exact de l'entité dans laquelle l'incident est survenu : Crédit Agricole CIB France

Quelle est votre relation avec l'entreprise ? Collaborateur

Avez-vous été personnellement témoin de l'incident ? Oui

L'incident est-il encore en cours ? Oui

Depuis combien de temps l'incident dure-t-il ? Depuis 1 à 3 mois

Avez-vous déjà informé un responsable ou quelqu'un de votre entreprise ? Non

Des responsables/managers sont-ils impliqués dans l'incident ? Oui

Y a-t-il déjà eu des dommages ? Oui

Si possible, précisez la nature des dommages : Matériels

Annexes

L'alerte sera analysée au niveau : Entity

ACTIVITÉS

- » 19-05-15 Alerte originale (0)
- » 19-05-15 Complément d'information (1)
- » 19-05-16 Commentaire (2)
- » 19-05-16 Commentaire (3)
- » 20-04-09 Catégorie (4)
- » 20-04-09 Pertinence (5)

Annexes

TRAITEMENT

Commentaire

Autres fonctions

EXAMINATEURS ATTRIBUÉS

ZANCE

RAPPEL

2020-04-30

BKMS® System Crédit Agricole S.A.
ZANZUCCHI-GARNIER, Celine

Alerte Cas 01

Veuillez-vous indiquer votre nom ?

Prénom : Toto
Nom de famille : Titi

Texte du message d'alerte :
A new employee, who joined us 3 months ago, steal industrial secrets to send thump to a Chinese bank.

Questions et réponses :

Dans quel pays l'incident est-il survenu ? France
 Dans quelle entité principale/groupe d'entités/holding l'incident est-il survenu ? CACIB
 Merci de préciser le nom exact de l'entité dans laquelle l'incident est survenu : Crédit Agricole CIB France
 Quelle est votre relation avec l'entreprise ? Collaborateur
 Avez vous été personnellement témoin de l'incident ? Oui

Répondre

Saisissez le texte de réponse pour le lanceur d'alerte.

Si des blocs de texte sont enregistrés, vous pouvez les sélectionner et les intégrer dans votre texte en cliquant sur « Appliquer ».

Ensuite, cliquez sur « Répondre » afin d'envoyer votre réponse.

En cliquant sur « Annuler », vous annulez le processus sans envoyer une réponse.

Vous disposez encore de 4096 caractères.

Annuler **Répondre**

The symbol in the upper right-hand corner above the reference area in the "Edit Alert" menu indicates you if the whistleblowing has set up a mailbox. In the Overview Reports, an X in the «PBox» column indicates this.

Your message to the whistleblower appears as an item in the “Activities” zone in the report view as well as in the reference box. The whistle-blower accesses your message in her/his post-box.

The supervisor and analyst process the alert within a reasonable period of time (2 months maximum) and communicate regularly with the whistleblower in order to keep him informed of the follow up to his alert acknowledgement of receipt, admissibility decision, its processing and cloture.

The reception of new alerts and the correspondences via the BKMS® dialog box generates the sending of an email. If you find that you have not received an email notification, while a new alert, which concerns your perimeter, has been generated in BKMS, please contact the system administrator at the following address: admin.ethicsalerts@credit-agricole-sa.fr.

4.5.5.Reminder

To create a reminder, please click on the ‘Apply’ button in the reminder section of the ‘edit report’ screen.

BKMS® System Crédit Agricole S.A.
ZANZUCCHI-GARNIER, Celine

Report Processing - ID 114 ACKNOWLEDGE & CLOSE | CLOSE

Category: Discrimination Relevance: B. Medium Status: Postbox existent

Category: Discrimination **Subject:** Alerte Cas 02 **Entity Name:** Discrimination, moral/sexual harassment, physical/sexual aggression

Do you want to state your name? No

Report text:
A leader constantly criticizes his secretary and her work. More he offends her all the time. At the end of each day, she's crying. Usually, she is a smiling person but since these attacks, she lost her smile and talks suicide with her colleagues.

Questions and Answers:

| | |
|----------------------------------------------------------------------------------------|----------------------|
| In which country did the incident occur? | France |
| In which group entity did the incident occur? | Crédit Agricole SA |
| Please select the exact name of the entity: | Crédit Agricole SA |
| What is your relationship with our company? | External employee |
| Did you observe the incident yourself? | Yes |
| Is the incident still ongoing? | Yes |
| How long has the incident been going on? | For more than 1 year |
| Have you already informed a manager and/or anyone else within your local organisation? | Yes |
| If you want, please specify the full name and function: | M Dupont, CEO |
| Are supervisors/managers involved in the incident? | Yes |
| Have damages already occurred? | Unknown |
| Attachment | |
| Which management level should process this report? | Entity |

PROCESSING

Comment

Answer

More functions

ASSIGNED EXAMINERS

ZANCE

REMINDER

STATISTICS

Include in statistics

When a reminder is programmed, the creator of the reminder as well as the responsible examiner are informed by e-mail about the follow-up of the report on the stipulated date.

REMINDER

2020-05-21

May 2020

| Mo | Tu | We | Th | Fr | Sa | Su |
|----|----|----|----|----|----|----|
| 27 | 28 | 29 | 30 | 1 | 2 | 3 |
| 4 | 5 | 6 | 7 | 8 | 9 | 10 |
| 11 | 12 | 13 | 14 | 15 | 16 | 17 |
| 18 | 19 | 20 | 21 | 22 | 23 | 24 |
| 25 | 26 | 27 | 28 | 29 | 30 | 31 |

BKMS® System Crédit Agr
ZANZUCCHI-GARNIE

Report Overview

Number of reports: 4 / 187

New reports: 69

Active reminder: 19

Text storage: 18%

Attachment storage: 2%

Filter [114 113 112 111] Display: All reports

Report documentation Reports/Page: 100 Number of pages: 1

| Status | ID | Date | Last activity | Category | Relevance | Subject | Entity Name | Conclusion | Reminder | Source | PBox | Language | Assignment |
|--------|-----|------------|---------------|------------------------------------|-----------|----------------|-------------------------------------------------|------------|------------|--------------|------|----------|------------|
| | 114 | 2019-05-15 | 2020-04-21 | Discrimination | B. Medium | Alerte Cas 02 | Crédit Agricole SA | | 2020-05-21 | BKMS®-Portal | X | eng | ZANCE |
| | 113 | 2019-05-15 | 2020-04-09 | Breach of trust | B. Medium | Alerte Cas 01 | Crédit Agricole CIB France | | 2020-04-30 | BKMS®-Portal | X | eng | ZANCE |
| | 112 | 2019-05-03 | 2019-05-03 | Corruption and breaches of probity | | vdvfasdcasdcas | Not applicable | | | BKMS®-Portal | | por | |
| | 111 | 2019-05-03 | 2019-05-03 | Corruption and breaches of probity | | Test | CA Indosuez Wealth (Europe), Sucursal en Espana | | | BKMS®-Portal | | por | |

The "Reminder" column in the "Alert Overview" indicates the reminder date, which is chosen for each alert. A yellow border marks these alerts as soon as the selected date is exceeded. The number of reminders programmed is shown at the top of the Overview Reports.

You can deactivate a reminder by clicking the symbol on the Report View and confirming deletion by clicking on the button "Apply".

4.5.6. Information of the targeted/concerned person by the alert

Precautions:

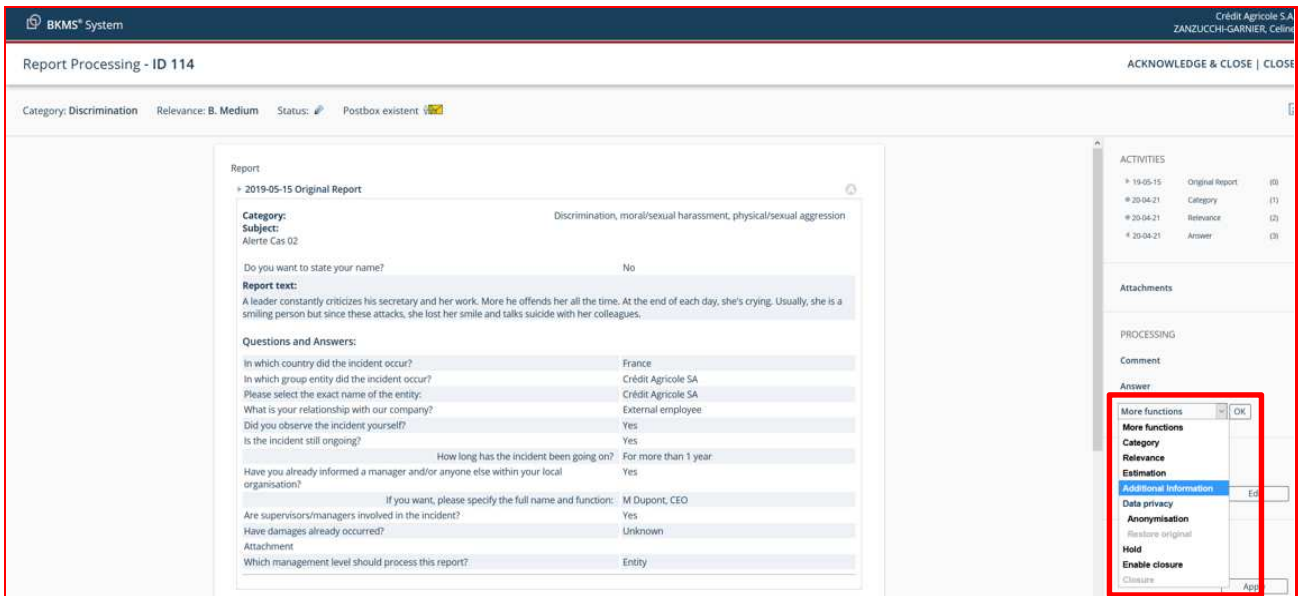
- Do not inform the person targeted in the following cases:
 - The identity of the whistle-blower cannot be protected.
 - There is a risk of evidence destruction.
- Respect the presumption of innocence. A wrong accusation, especially for serious facts, can be extremely traumatic.
- Have the person sign a confidentiality letter.
- Do not provide any information about the type of report, the content of the report or the whistle-blower.
- Take precautions regarding the organization and the content of the interview (confidentiality, the interview must be conducted by two instructors).
- Send an interview report (place of recall of the interview, date of the interview, the persons attending the interview, remind the person concerned that he/she benefits and is subject to confidentiality).

4.5.7. Conclusion/ additional information

Once the investigation is completed, the examiner determines (if necessary) with the support of the alerts management committee, the action to be taken, namely a transmission to the:

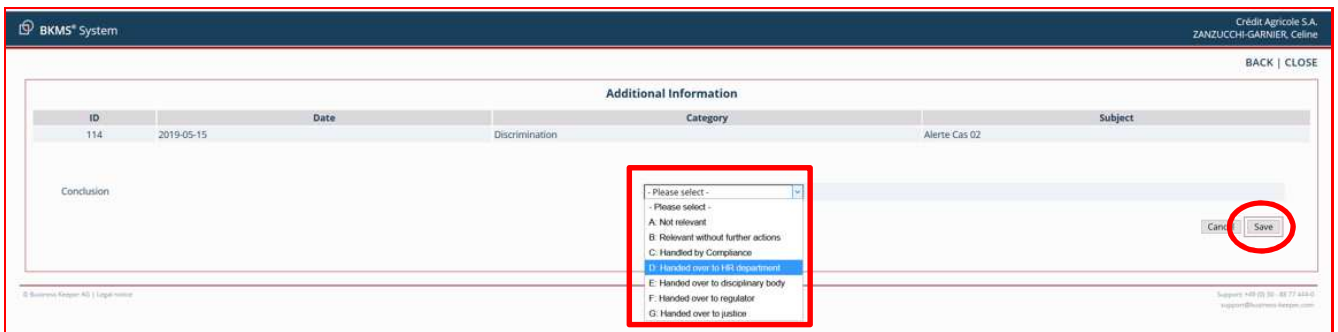
- The Human Resources Department of the entity
- Administrative / regulatory authorities
- Compliance Department of the Entity
- Judicial authorities

When all discussions are finished and a decision has been taken, the report is ready to be closed. The examiner registers the conclusion in the BKMS system, choosing the 'additional information' function.



The examiner must select the appropriate conclusion in the dropdown list:

- Not relevant
- Relevant without further actions
- Handled by Compliance
- Handled over to HR department
- Handled over to the disciplinary body
- Handled over to the regulator
- Handled over to justice



The examiner informs the whistle-blower that the investigation is finished (using the standard message, if he wishes to do so).

4.5.8. Closure: 2 steps

As the BKMS system is based on the “4 eyes” principle, the examiner is not allowed to close the file himself. The closure process needs two steps: a closure proposed by the analyst and then, a closure & approval done by the supervisor.

4.5.8.1. Step 1: "Enable closure"

Once all the investigation steps have been completed, the person in charge of the report suggests closing the report ("enable closure" function, analyst profile).

The screenshot shows the 'Report Processing - ID 114' interface. The report details include: Category: Discrimination, Subject: Alerte Cas 02, and a 'Report text' describing a leader's criticism of a secretary. A 'Questions and Answers' section follows. On the right, the 'More functions' menu is open, showing options like 'More functions', 'Category', 'Relevance', 'Estimation', 'Additional Information', 'Data privacy', 'Anonymisation', 'Hold', 'Enable closure', and 'Closure'. The 'Enable closure' option is highlighted in blue.



The screenshot shows the 'Enable closure' dialog box. It includes a text area for a comment, a character count of 4082, and an 'Enable closure' button highlighted with a red circle. The dialog box also contains instructions for enabling closure and notes about text modules and anonymisation.

Activating the "Allow closure" function causes the symbol to be displayed in the Overview reports.

The examiner, analyst profile, assigns the alert to no one authorized to close an alert (supervisor)

ASSIGNED EXAMINERS

Edit

The assigned examiner (supervisor profile) receives an email informing him that an action is to be completed in BKMS.

4.5.8.2. Step 2: Final closure

Warning: the closure of a file is irreversible and definitive. Only the consultation and anonymization functions are possible.

Report Processing - ID 114

Category: Discrimination Relevance: B. Medium Status: Postbox existent

Report

2019-05-15 Original Report

Category: Discrimination, moral/sexual harassment, physical/sexual aggression

Subject: Alerte Cas 02

Do you want to state your name? No

Report text: A leader constantly criticizes his secretary and her work. More he offends her all the time. At the end of each day, she's crying. Usually, she is a smiling person but since these attacks, she lost her smile and talks suicide with her colleagues.

Questions and Answers:

| | |
|----------------------------------------------------------------------------------------|----------------------|
| In which country did the incident occur? | France |
| In which group entity did the incident occur? | Crédit Agricole SA |
| Please select the exact name of the entity: | Crédit Agricole SA |
| What is your relationship with our company? | External employee |
| Did you observe the incident yourself? | Yes |
| Is the incident still ongoing? | Yes |
| How long has the incident been going on? | For more than 1 year |
| Have you already informed a manager and/or anyone else within your local organisation? | Yes |
| If you want, please specify the full name and function: | M Dupont, CEO |
| Are supervisors/managers involved in the incident? | Yes |
| Have damages already occurred? | Unknown |
| Attachment | |
| Which management level should process this report? | Entity |

ACTIVITIES

- 19-05-15 Original Report (0)
- 20-04-21 Category (1)
- 20-04-21 Relevance (2)
- 20-04-21 Answer (3)
- 20-04-21 Anonymisation (4)
- 20-04-21 Restore original (5)
- 20-04-21 Enable closure (6)

More functions

- Data privacy
- Anonymisation
- Restore original
- Enable closure
- Closure



Close report

Please decide on the report closure. By choosing "No" the report is reset to the status "In process".

Closure:

Yes No

Please decide whether the report should be included in statistics before closing it. This cannot be changed afterwards.

Include in statistics:

Yes No

Please comment on the report closure.

Finally, please click the "OK" button to confirm your entries.

Notes:

If text modules have been created, you can insert them into your text by clicking the "Apply" button.

Please check whether further anonymisation of the data is necessary. Once the report has been closed, further anonymisations can be made, but the original version cannot be restored.

You still have 4089 characters at your disposal.

Comment

OK

If the Examiner (supervisor) disagrees with the conclusion, he notifies his disagreement through a comment and asks the examiner (analyst) to investigate further. The status of the report then reverts to "in process".

If the Examiner (supervisor) agrees the conclusion of the examiner (analyst), he notifies his agreement in a comment and closes the report.

NB:

- The whistle-blower and must be informed of the closing of the report.
- After the closure of the alert, the whistleblower has no longer the possibility to send messages via the Exchange Box.

4.5.9. Anonymization

The alert must be anonymized no later than 12 months after the closure of the alert.

The "Anonymization" function makes it possible to hide the names or other personal information contained in an alert.

To find the names or personal information to anonymize, use the 'Search' function.

The words found are highlighted in yellow. Please respect upper and lower case letters when searching.

BKMS System Crédit Agricole S.A.
ZANZUCCH-GARNIER, Céline

Report Processing - ID 114 ACKNOWLEDGE & CLOSE | CLOSE

Category: Discrimination Relevance: B. Medium Status: Postbox existent

Report

2019-05-15 Original Report

Category: Discrimination, moral/sexual harassment, physical/sexual aggression
Subject: Alerte Cas 02

Do you want to state your name? No

Report text:
A leader constantly criticizes his secretary and her work. More he offends her all the time. At the end of each day, she's crying. Usually, she is a smiling person but since these attacks, she lost her smile and talks suicide with her colleagues.

Questions and Answers:

| | |
|----------------------------------------------------------------------------------------|----------------------|
| In which country did the incident occur? | France |
| In which group entity did the incident occur? | Crédit Agricole SA |
| Please select the exact name of the entity? | Crédit Agricole SA |
| What is your relationship with our company? | External employee |
| Did you observe the incident yourself? | Yes |
| Is the incident still ongoing? | Yes |
| How long has the incident been going on? | For more than 1 year |
| Have you already informed a manager and/or anyone else within your local organisation? | Yes |
| If you want, please specify the full name and function: | M Dupont, CEO |
| Are supervisors/managers involved in the incident? | Yes |
| Have damages already occurred? | Unknown |
| Attachment | |
| Which management level should process this report? | Entity |

ACTIVITIES

- 19-05-15 Original Report (0)
- 20-04-21 Category (1)
- 20-04-21 Relevance (2)
- 20-04-21 Answer (0)

Attachments

PROCESSING

Comment

Answer

More functions

- More functions
- Category
- Relevance
- Estimation
- Additional Information
- Data privacy
- Anonymisation**
- Restore original
- Hold
- Enable closure
- Closure

BKMS System Crédit Agricole S.A.
ZANZUCCH-GARNIER, Céline

BACK | CLOSE

Data privacy - Anonymisation

| ID | Date | Category | Subject |
|-----|------------|----------------|---------------|
| 114 | 2019-05-15 | Discrimination | Alerte Cas 02 |

secretary Search

Select element for anonymisation:

2019-05-15 Original Report (0)

Category: Discrimination, moral/sexual harassment, physical/sexual aggression

Subject: Alerte Cas 02

Do you want to state your name? No

Report text:
A leader constantly criticizes his secretary and her work. More he offends her all the time. At the end of each day, she's crying. Usually, she is a smiling person but since these attacks, she lost her smile and talks suicide with her colleagues.

Questions and Answers:

| | |
|----------------------------------------------------------------------------------------|----------------------|
| In which country did the incident occur? | France |
| In which group entity did the incident occur? | Crédit Agricole SA |
| Please select the exact name of the entity? | Crédit Agricole SA |
| What is your relationship with our company? | External employee |
| Did you observe the incident yourself? | Yes |
| Is the incident still ongoing? | Yes |
| How long has the incident been going on? | For more than 1 year |
| Have you already informed a manager and/or anyone else within your local organisation? | Yes |
| If you want, please specify the full name and function: | M Dupont, CEO |
| Are supervisors/managers involved in the incident? | Yes |
| Have damages already occurred? | Unknown |
| Attachment | |
| Which management level should process this report? | Entity |

Once you have identified the character that you want to replace, select the number and type of characters and click one 'replace'.

Repeat this process as many times as necessary. Do not forget to add a comment in the text box before saving.

BKMS[®] System Crédit Agricole S.A.
ZANZUCCHI-GARNIER, Celine

| ID | Date | Category | Subject |
|-----|------------|----------------|---------------|
| 114 | 2019-05-15 | Discrimination | Alerte Cas 02 |

Characters: | secretary | Search

Selection: Single All

Number of replacements: 10 | X | Replace | Undo replacements

2019-05-15 Original Report (0)

Category: Discrimination, moral/sexual harassment, physical/sexual aggression

Subject: Alerte Cas 02

Do you want to state your name? No

Report text:
A leader constantly criticizes [XXXXXXXXXX] in her work. More he offends her all the time. At the end of each day, she's crying. Usually, she is a smiling person but since these attacks, she lost her smile and talks suicide with her colleagues.

Questions and Answers:

In which country did the incident occur? France

In which group entity did the incident occur? Crédit Agricole SA

Please select the exact name of the entity: Crédit Agricole SA

What is your relationship with our company? External employee

Did you observe the incident yourself? Yes

Is the incident still ongoing? Yes

How long has the incident been going on? For more than 1 year

Have you already informed a manager and/or anyone else within your local organisation? Yes

If you want, please specify the full name and function: M Dupont, CEO

Are supervisors/managers involved in the incident? Yes

Have damages already occurred? Unknown

Attachment

Which management level should process this report? Entity

Text mode: Anonymisation | Apply text module

You still have 1987 characters at your disposal. Cancel Save



BKMS[®] System Crédit Agricole S.A.
ZANZUCCHI-GARNIER, Celine

Report Processing - ID 114 ACKNOWLEDGE & CLOSE | CLOSE

Category: Discrimination | Relevance: B. Medium | Status: | Postbox existent:

In which country did the incident occur? France

In which group entity did the incident occur? Crédit Agricole SA

Please select the exact name of the entity: Crédit Agricole SA

What is your relationship with our company? External employee

Did you observe the incident yourself? Yes

Is the incident still ongoing? Yes

How long has the incident been going on? For more than 1 year

Have you already informed a manager and/or anyone else within your local organisation? Yes

If you want, please specify the full name and function: M Dupont, CEO

Are supervisors/managers involved in the incident? Yes

Have damages already occurred? Unknown

Attachment

Which management level should process this report? Entity

2020-04-21 Category (ZANCE) (1)
The category has been changed - System Confirmation
old: Discrimination, moral/sexual harassment, physical/sexual aggression
new: Discrimination

2020-04-21 Relevance (ZANCE) (2)
Relevance has been changed - System Confirmation
old: Not specified
new: B. Medium

2020-04-21 Answer (ZANCE) (3)
Answer

2020-04-21 Anonymisation (ZANCE) (4)
Anonymised activity: 0
anonymisation

ACTIVITIES

| ID | Category | Relevance | Activity |
|----------|---------------------|-----------|----------|
| 19-05-15 | Original Report (A) | (0) | |
| 20-04-21 | Category | (1) | |
| 20-04-21 | Relevance | (2) | |
| 20-04-21 | Answer | (3) | |
| 20-04-21 | Anonymisation | (4) | |

Attachments

PROCESSING

Comment

Answer

More functions:

ASSIGNED EXAMINERS

ZANCE

REMINDER

2020-05-21

STATISTICS

Include in statistics

ARCHIVING

BKMS System Crédit Agricole S.A.
ZANUCCI-GARNIER, Céline

Report Processing - ID 114 ACKNOWLEDGE & CLOSE | CLOSE

Category: **Discrimination** Relevance: **B. Medium** Status: Postbox existent

In which country did the incident occur? France

In which group entity did the incident occur? Crédit Agricole SA

Please select the exact name of the entity: Crédit Agricole SA

What is your relationship with our company? External employee

Did you observe the incident yourself? Yes

Is the incident still ongoing? Yes

How long has the incident been going on? For more than 1 year

Have you already informed a manager and/or anyone else within your local organisation? Yes

If you want, please specify the full name and function: M Dupont, CEO

Are supervisors/managers involved in the incident? Yes

Have damages already occurred? Unknown

Attachment

Which management level should process this report? Entry

ACTIVITIES

- # 15-05-19 Original Report (4)
- # 20-04-21 Category (1)
- # 20-04-21 Relevance (2)
- # 20-04-21 Answer (3)
- # 20-04-21 Anonymisation (4)

Attachments

PROCESSING

Comment

Answer

More functions

More functions

Category

Relevance

Estimation

Additional information

Data

Anonymisation

Restore original

Hold

Enable closure

STATISTICS

include in statistics

ARCHIVING

Print

Download



BKMS System Crédit Agricole S.A.
ZANUCCI-GARNIER, Céline

BACK | CLOSE

Data privacy - Restore original

| ID | Date | Category | Alerte Cas 02 | Subject |
|-----|------------|----------------|---------------|---------|
| 114 | 2019-05-15 | Discrimination | | |

Select element for restoration:

15.05.2019 Original Report (0)

Anonymisation 1 - 2020-04-21 (ZANCE)

Category: Discrimination, moral/sexual harassment, physical/sexual aggression

Subject: Alerte Cas 02

Do you want to state your name? No

Report text:
A leader constantly criticizes his XXXXXXXXXX and her work. More he offends her all the time. At the end of each day, she's crying. Usually, she is a smiling person but since these attacks, she lost her smile and talks suicide with her colleagues.

Questions and Answers:

In which country did the incident occur? France

In which group entity did the incident occur? Crédit Agricole SA

Please select the exact name of the entity: Crédit Agricole SA

What is your relationship with our company? External employee

Did you observe the incident yourself? Yes

Is the incident still ongoing? Yes

How long has the incident been going on? For more than 1 year

Have you already informed a manager and/or anyone else within your local organisation? Yes

If you want, please specify the full name and function: M Dupont, CEO

Are supervisors/managers involved in the incident? Yes

Have damages already occurred? Unknown

Attachment

Text modules -

Comment

You still have 4000 characters at your disposal.

The screenshot displays the BKMS System interface for report processing. The main area contains a form with the following questions and answers:

- How long has the incident been going on? For more than 1 year
- Have you already informed a manager and/or anyone else within your local organisation? Yes
- If you want, please specify the full name and function: M Dupont, CEO
- Are supervisors/managers involved in the incident? Yes
- Have damages already occurred? Unknown
- Attachment
- Which management level should process this report? Entity

Below the form, there are sections for system confirmation of changes:

- 2020-04-21 Category (ZANCE)**: The category has been changed - System Confirmation. Old: Discrimination, moral/sexual harassment, physical/sexual aggression. New: Discrimination.
- 2020-04-21 Relevance (ZANCE)**: Relevance has been changed - System Confirmation. Old: Not specified. New: B. Medium.
- 2020-04-21 Answer (ZANCE)**: Answer
- 2020-04-21 Anonymisation 1 (ZANCE)**: Anonymised activity: 0
- 2020-04-21 Restore original (ZANCE)**: Restored activity: 0

The right-hand sidebar contains several sections:

- ACTIVITIES**: A list of activities with columns for date, action, and count. The 'Anonymisation' and 'Restore original' entries are highlighted in red.
- Attachments**
- PROCESSING**: Includes a comment field, an answer field, and a 'More functions' button with a 'OK' button.
- ASSIGNED EXAMINERS**: Shows 'ZANCE' with an 'Edit' button.
- REMINDER**: Shows '2020-05-21' with an 'Apply' button.
- STATISTICS**: Includes a checkbox for 'Include in statistics' and an 'Apply' button.
- ARCHIVING**

You can undo all anonymizations by clicking the "Restore Original" button in individual sections or in the entire alert.

4.6. Specific processing (via the BKMS Group tool)

4.6.1. Handling of corruption cases

In order to meet the AFA's requirements (French Anticorruption Agency), the specific treatment of cases of corruption is subject to special monitoring by the entity, in charge of the case processing and Crédit Agricole SA, as a central body, in charge of the supervision of the Group anticorruption device.

The entity: acknowledges receipt of the alert, conducts investigations, and, if the case of corruption is proven, immediately alerts Crédit Agricole SA, Compliance Division, Fraud Prevention and Anti-Corruption Unit, in accordance with the 2018-43 procedure. The conclusions (proven or not proven) and the follow-up to the alert must be recorded, as precisely as possible, in the "comment" area of BKMS.

Crédit Agricole SA / DDC: performs special monitoring of corruption cases reported via BKMS. Ensures that the entity is taking charge of the case, the measures taken and the action plan. Records these items in the BKMS alert tracking table.

4.6.2. Special case of anonymous alert

An alert sent by a person who wishes to remain anonymous may be dealt if the seriousness of the facts mentioned is established and the factual elements are sufficiently detailed. Encourage them, if possible, to reveal their identity in order to:

- Benefits from the whistleblower protection
- That his alert be handled as best as possible
- Remain cautious in handling an anonymous alert that may be defamatory
- Give systematically the benefit of the doubt to the person concerned

If the whistleblower’s identity is later revealed during the processing of the file, he/she will benefit from the protection conferred by his/her status.

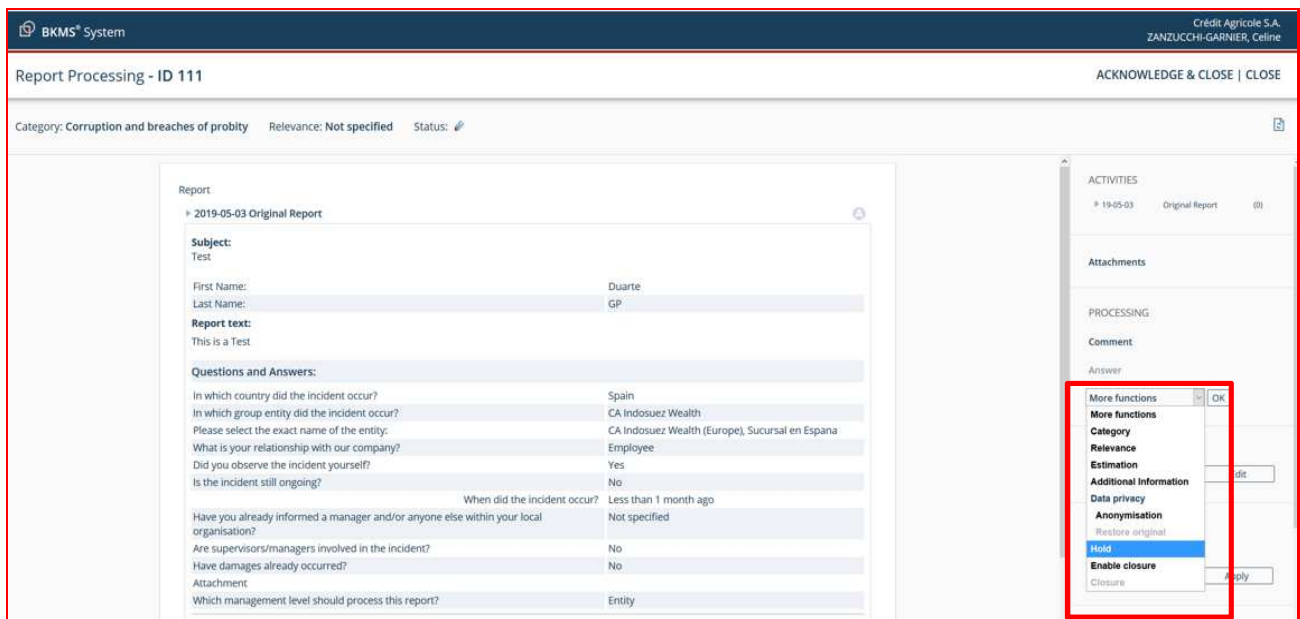
4.6.3. Extension of the investigation

In case the examiner cannot process the file within 2 months (maximum), given the report complexity, he shall inform the whistle-blower of the extension of the processing phase.

4.6.4. Freeze the examination of the file (Hold)

This feature allows freezing a file (making it impossible to make changes on the file or interact with the whistle-blower); this functionality can be used, for example, at the express request of the police.

“Hold” function (see image below):



When the report is displayed under the “Hold” status, the report can only be printed off and downloaded. An internal comment can also be added and all other functions are inactive.

The change of status appears in the “Activities” by the symbol. 🖱️

The “More Functions” drop-down menu now displays the item “Remove Hold” to reactivate the report.

BKMS* System Crédit Agricole S.A.
ZANZUCCHI-GARNIER, Celine

Report Processing - ID 111 ACKNOWLEDGE & CLOSE | CLOSE

Category: Corruption and breaches of probity Relevance: Not specified Status:

Report

» 2019-05-03 Original Report

Subject:
Test

First Name: Duarte
Last Name: GP

Report text:
This is a Test

Questions and Answers:

In which country did the incident occur? Spain
 In which group entity did the incident occur? CA Indosuez Wealth
 Please select the exact name of the entity: CA Indosuez Wealth (Europe), Sucursal en Espana
 What is your relationship with our company? Employee
 Did you observe the incident yourself? Yes
 Is the incident still ongoing? No
 When did the incident occur? Less than 1 month ago
 Have you already informed a manager and/or anyone else within your local organisation? Not specified.
 Are supervisors/managers involved in the incident? No
 Have damages already occurred? No
 Attachment
 Which management level should process this report? Entity

ACTIVITIES

» 19-05-03 Original Report (0)
 » 20-04-21 Hold (1)

Attachments

PROCESSING

Comment

Answer:

More functions
 More functions
 Remove Hold
 ASSIGNED EXAMINERS

REMINDER

BKMS* System Crédit Agricole S.A.
ZANZUCCHI-GARNIER, Celine

Activities ID: 111

» 19-05-03 Original Report (0)
 » 20-04-21 Hold (1)

Category: Corruption and breaches of probity

» 2019-05-03 Original Report

Subject:
Test

First Name: Duarte
Last Name: GP

Report text:
This is a Test

Questions and Answers:

In which country did the incident occur? Spain
 In which group entity did the incident occur? CA Indosuez Wealth
 Please select the exact name of the entity: CA Indosuez Wealth (Europe), Sucursal en Espana
 What is your relationship with our company? Employee
 Did you observe the incident yourself? Yes
 Is the incident still ongoing? No
 When did the incident occur? Less than 1 month ago
 Have you already informed a manager and/or anyone else within your local organisation? Not specified.
 Are supervisors/managers involved in the incident? No
 Have damages already occurred? No
 Attachment
 Which management level should process this report? Entity

Remove Hold - Text modules -

Please enter your comment here to reactivate the report, i.e., the status "Hold" will be removed.

If text modules have been created, you can insert them into your text by clicking the "Apply" button.

To complete and activate your report, please click the "Save" button.

Comment

Comment

You still have | 4085 | characters at your disposal.



BKMS System Crédit Agricole S.A.
ZANZUCCHI-GARNIER, Céline

Report Processing - ID 111 ACKNOWLEDGE & CLOSE | CLOSE

Category: Corruption and breaches of probity Relevance: Not specified Status:

Report

2019-05-03 Original Report

Subject:
Test

First Name: Duarte
Last Name: GP

Report text:
This is a Test

Questions and Answers:

| | |
|----------------------------------------------------------------------------------------|-------------------------------------------------|
| In which country did the incident occur? | Spain |
| In which group entity did the incident occur? | CA Indosuez Wealth |
| Please select the exact name of the entity: | CA Indosuez Wealth (Europe), Sucursal en Espana |
| What is your relationship with our company? | Employee |
| Did you observe the incident yourself? | Yes |
| Is the incident still ongoing? | No |
| When did the incident occur? | Less than 1 month ago |
| Have you already informed a manager and/or anyone else within your local organisation? | Not specified |
| Are supervisors/managers involved in the incident? | No |
| Have damages already occurred? | No |
| Attachment | |
| Which management level should process this report? | Entity |

ACTIVITIES

- 19-05-03 Original Report (0)
- 20-04-21 Hold (1)
- 20-04-21 Remove Hold (2)

Attachments

PROCESSING

Comment

Answer

More functions

ASSIGNED EXAMINERS

REMINDER

STATISTICS

Include in statistics

ARCHIVING

hold

2020-04-21 Remove Hold (ZANCE) (2)

Remove Hold

4.7. Other functions

4.7.1. Comments

The examiner notifies in this text area his comments, and his analysis of the file. This part is not visible for the whistleblower.

BKMS System Crédit Agricole S.A.
ZANZUCCHI-GARNIER, Céline

Report Processing - ID 111 ACKNOWLEDGE & CLOSE | CLOSE

Category: Corruption and breaches of probity Relevance: Not specified Status:

Report

2019-05-03 Original Report

Subject:
Test

First Name: Duarte
Last Name: GP

Report text:
This is a Test

Questions and Answers:

| | |
|----------------------------------------------------------------------------------------|-------------------------------------------------|
| In which country did the incident occur? | Spain |
| In which group entity did the incident occur? | CA Indosuez Wealth |
| Please select the exact name of the entity: | CA Indosuez Wealth (Europe), Sucursal en Espana |
| What is your relationship with our company? | Employee |
| Did you observe the incident yourself? | Yes |
| Is the incident still ongoing? | No |
| When did the incident occur? | Less than 1 month ago |
| Have you already informed a manager and/or anyone else within your local organisation? | Not specified |
| Are supervisors/managers involved in the incident? | No |
| Have damages already occurred? | No |
| Attachment | |
| Which management level should process this report? | Entity |

ACTIVITIES

- 19-05-03 Original Report (0)
- 20-04-21 Hold (1)
- 20-04-21 Remove Hold (2)

Attachments

PROCESSING

Comment

Answer

More functions

ASSIGNED EXAMINERS

REMINDER

Add Comment Text modules -

Please enter your comment here.

If text modules have been created, you can insert them into your text by clicking the "Apply" button.

To complete the process, please click the "Save" button.

Comment

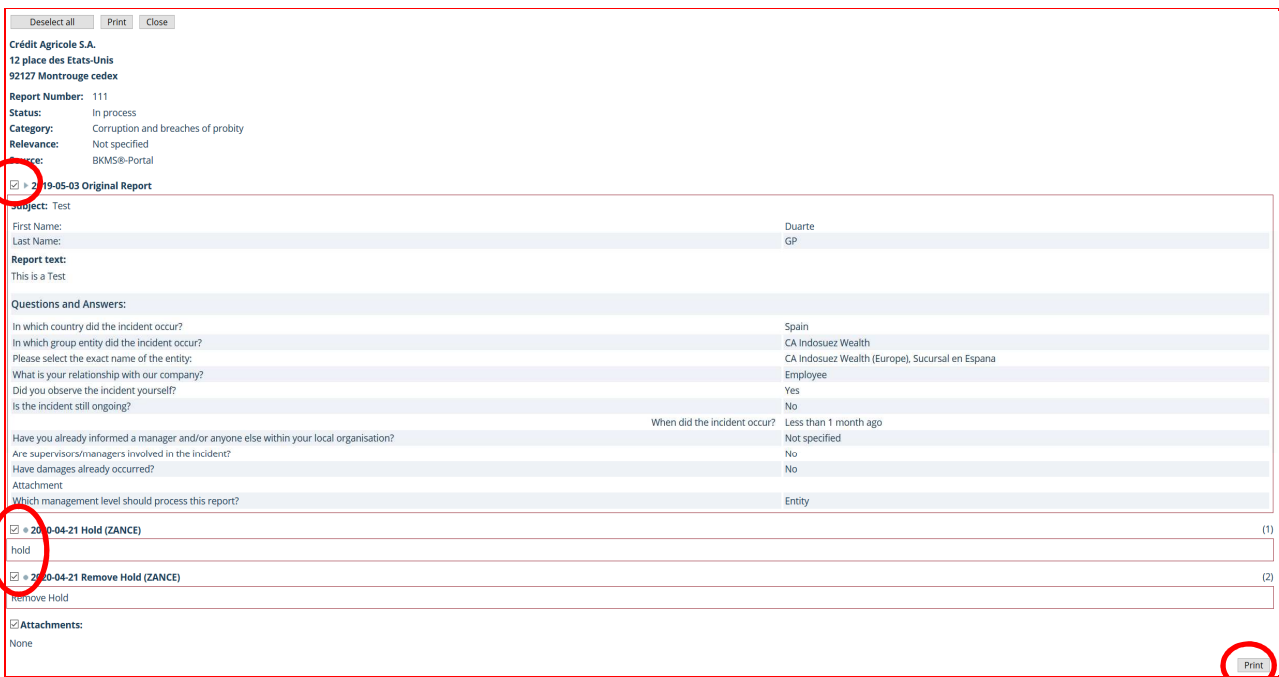
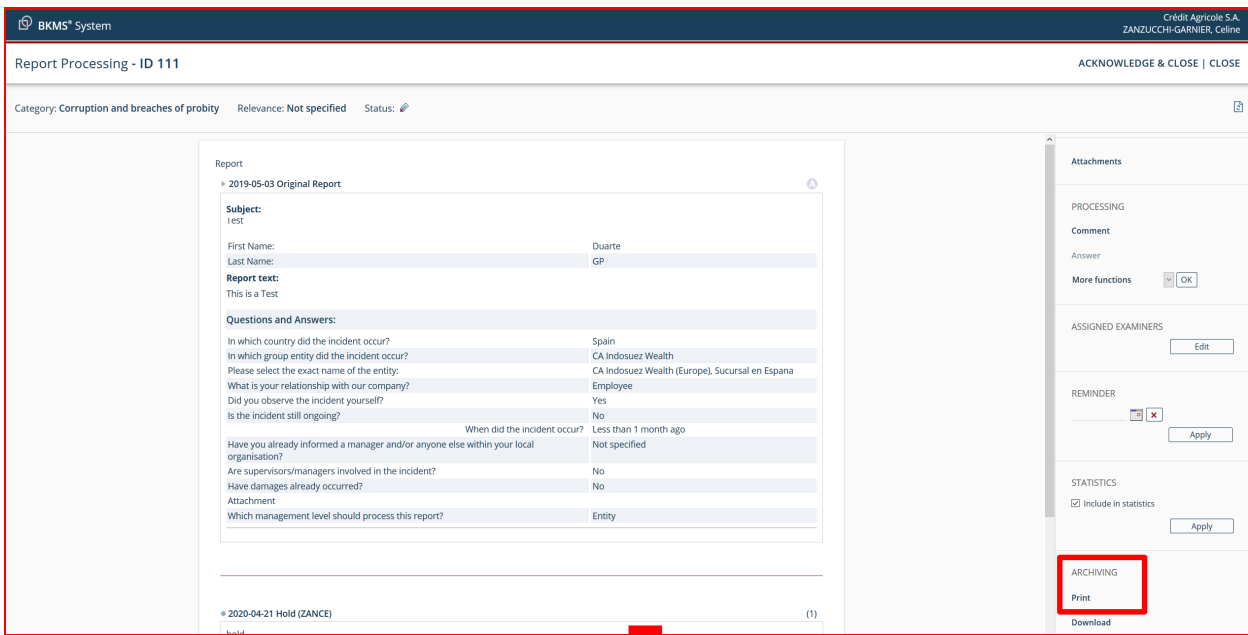
You still have 4089 characters at your disposal.

The comment is documented in the “Activities” zone in the Report View as well as in the reference box.

4.7.2. Print

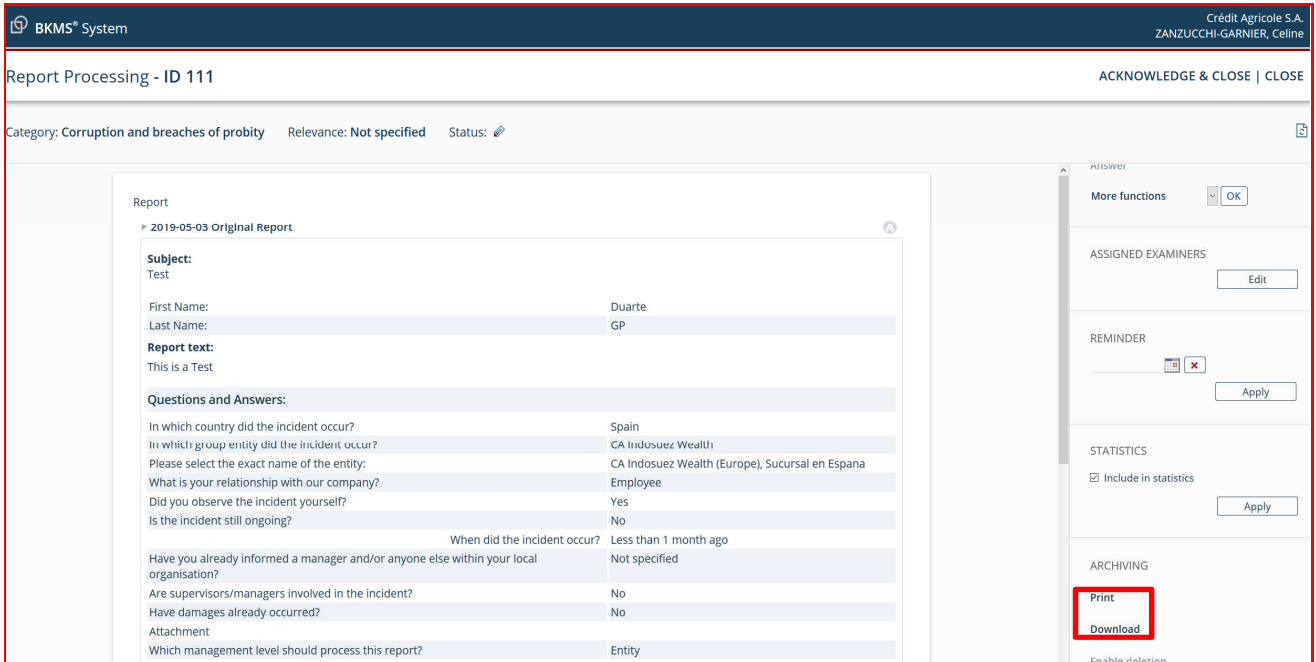
The person in charge of the file can print the entire file or only the selected parts.

WARNING : As soon as a document is printed, it leaves the BKMS secure system and therefore requires you to take measures to ensure the confidentiality and security of the information contained in the file.



4.7.3. Download

The person who is in charge of an report can download it. The HTML file makes it possible to view the report directly in your browser, while the XML format can be used for further processing. If both HTML file and XML file are generated, both files are compressed for simultaneous download (zip). The default file name consists of the following elements: Report-ID_status_language.file-format.



BKMS* System Crédit Agricole S.A.
ZANZUCCHI-GARNIER, Celine

Report Processing - ID 111 ACKNOWLEDGE & CLOSE | CLOSE

Category: Corruption and breaches of probity Relevance: Not specified Status:

Report

> 2019-05-03 Original Report

Subject:
Test

First Name: Duarte
Last Name: GP

Report text:
This is a Test

Questions and Answers:

| | |
|----------------------------------------------------------------------------------------|-------------------------------------------------|
| In which country did the incident occur? | Spain |
| In which group entity did the incident occur? | CA Indosuez Wealth |
| Please select the exact name of the entity: | CA Indosuez Wealth (Europe), Sucursal en Espana |
| What is your relationship with our company? | Employee |
| Did you observe the incident yourself? | Yes |
| Is the incident still ongoing? | No |
| When did the incident occur? | Less than 1 month ago |
| Have you already informed a manager and/or anyone else within your local organisation? | Not specified |
| Are supervisors/managers involved in the incident? | No |
| Have damages already occurred? | No |
| Attachment | |
| Which management level should process this report? | Entity |

More functions

ASSIGNED EXAMINERS

REMINDER

STATISTICS
 Include in statistics

ARCHIVING

Enable deletion

WARNING: as soon as a document is printed or downloaded, it leaves the secure BKMS system and therefore obliges you to take measures to guarantee the confidentiality and security of the information in the file.

4.7.4. Reporting

The application allows creating statistics according to the perimeters of connected users. The statistics consist in exporting the alerts in the form of tables (Excel) containing all the information entered by the whistleblowers.

To access it, simply click on the drop-down list "report documentation», select «Statistics», and click on 'Continue'.

Report Overview - Internet Explorer
 https://training.bkms-system.net/bkwebanon/action/client/clientReportList.do
 Business Keeper AG [DE]
 BKMS® System
 Crédit Agricole S.A. LAVENU, Francois

Report Overview

CLOSE

Number of reports: **15 / 183** New reports: **74** Active Reminder: **18** Text storage: **18%** Attachment storage: **2%**

Report documentation
 --- Print reports ---
 All reports
 New reports
 Reports in process
 Closed reports
 Statistics
 Continue

Search [X] Display: Closed [v] [OK]

Reports/Page: 10 Number of pages: 2 1 2 >>

| Status | ID | Date | Last activity | Category | Relevance | Subject | Entity Name |
|--------|-----|------------|---------------|-------------------------------------------|-----------|---------------------------------|-----------------------------------------|
| | 320 | 2020-03-30 | 2020-03-30 | Corruption | B. Medium | Démonstration traitement alerte | Credit Agricole CIB Norway represent... |
| | 316 | 2020-03-30 | 2020-03-31 | Abuse of corporate assets, illegal acq... | | LOT 5 Test 07 | CA Indosuez (Switzerland) S.A. Duba... |
| | 314 | 2020-03-30 | 2020-03-31 | Price manipulations, and insider tradi... | A. High | LOT 5 Test 04 | SAS LA ROCHELLE IMMOBILIER |

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 https://training.bkms-system.net/bkwebanon/action/client/clientReportList.do# 150%

A new 'Filed statistics' interface opens, a list of reports already archived / consigned may be present, these are statistics which have already been recorded by the same user in the past. Click on "Create statistics".

Filed statistics - Internet Explorer
 https://training.bkms-system.net/bkwebanon/action/client/clientPersistentReports.do?reportType=leads
 Business Keeper AG [DE]
 BKMS® System
 Crédit Agricole S.A. LAVENU, Francois

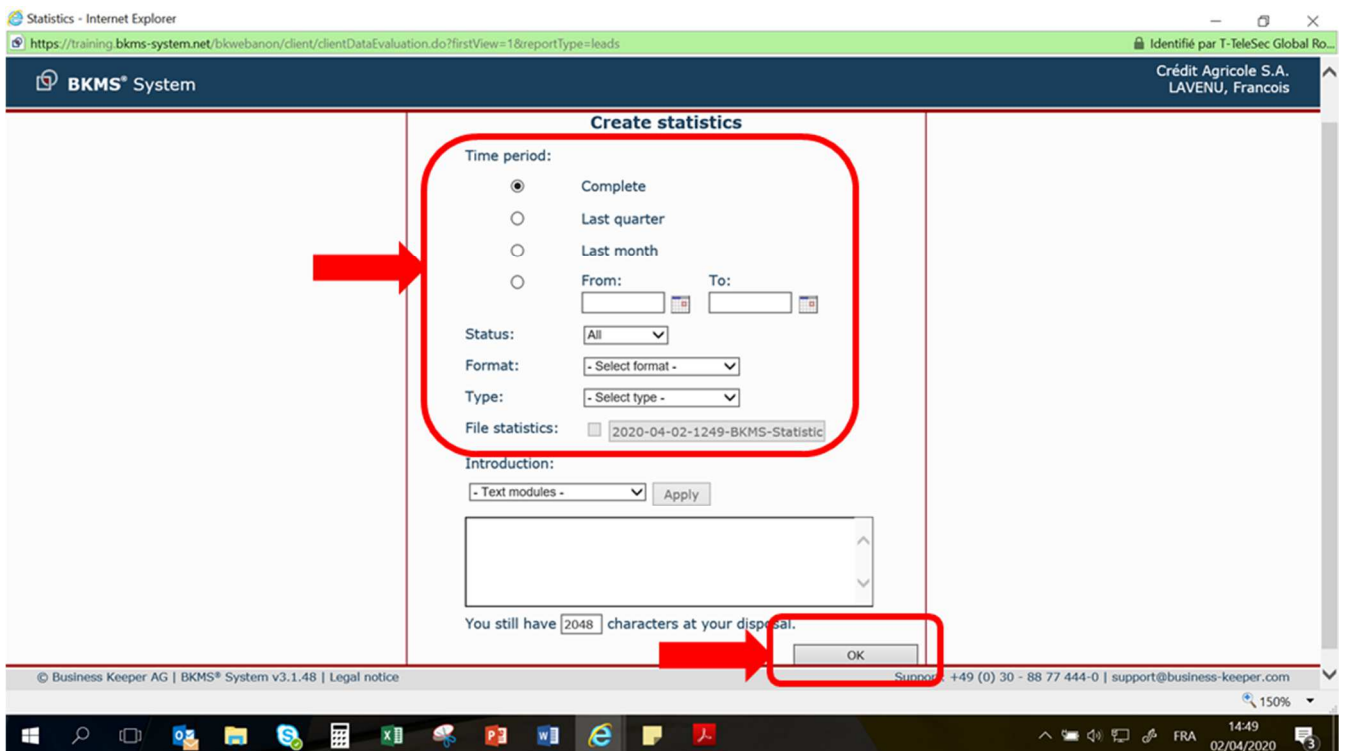
Filed statistics

CLOSE

Create statistics From: [] To: [] [OK] [X]

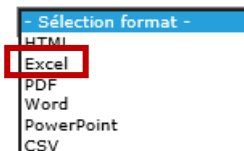
| Date | File name | Format | File size | Statistics | Status | Time period |
|------------|---------------------------------|--------|-----------|---------------------------|--------|-------------------------|
| 2020-04-02 | 2020-04-02-0946-BKMS-Statistics | Excel | 21 KB | Evaluation of report page | All | - |
| 2020-03-31 | 2020-03-31-1451-BKMS-Statistics | Excel | 4 KB | Evaluation of report page | All | - |
| 2020-03-31 | 2020-03-31-1448-BKMS-Statistics | Excel | 4 KB | Evaluation of report page | All | - |
| 2020-03-31 | 2020-03-31-1442-BKMS-Statistics | Excel | 4 KB | Evaluation of report page | All | - |
| 2020-03-31 | 2020-03-31-1438-BKMS-Statistics | Excel | 11 KB | Evaluation of report page | New | - |
| 2020-03-31 | 2020-03-31-1437-BKMS-Statistics | Excel | 4 KB | Evaluation of report page | All | 2020-02-01 - 2020-02-29 |
| 2020-03-31 | 2020-03-31-1434-BKMS-Statistics | Excel | 5 KB | Evaluation of report page | All | 2020-03-24 - 2020-03-31 |
| 2020-03-31 | 2020-03-31-1432-BKMS-Statistics | Excel | 21 KB | Evaluation of report page | All | - |
| 2020-03-31 | 2020-03-31-1348-BKMS-Statistics | Excel | 4 KB | Evaluation of report page | All | 2020-03-23 - 2020-04-03 |

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 14:47 02/04/2020 150%



- Time period : choose the time period
 - o Complete : for the beginning
 - o Last quarter
 - o Last month
 - o you can define a specific period
- Status : choose which alerts do you want in your reporting
 - o all
 - o new
 - o in process
 - o hold
 - o closed
 - o deleted

- Format : choose Excel (only format available)




- Type : choose « Evaluation of report page »
- Files statistics : if you want to keep the reporting in the “filed statistics” tick the box

Close

Filed statistics

Create statistics From: To: OK X

| Date | File name | Format | File size | Statistics | Status | Time period | |
|------------|---------------------------------|--------|-----------|---------------------------|--------|-------------------------|---|
| 2020-01-15 | 2020-01-15-0912-BKMS-Statistics | Excel | 5 KB | Evaluation of report page | All | - | X |
| 2019-11-14 | 2019-11-14-0848-BKMS-Statistics | Excel | 4 KB | Evaluation of report page | All | - | X |
| 2019-11-14 | 2019-11-14-0846-BKMS-Statistics | Excel | 4 KB | Evaluation of report page | All | - | X |
| 2019-11-14 | 2019-11-14-0844-BKMS-Statistics | Excel | 11 KB | Evaluation of report page | New | - | X |
| 2019-11-14 | 2019-11-14-0843-BKMS-Statistics | Excel | 5 KB | Evaluation of report page | All | 2019-10-01 - 2019-10-31 | X |
| 2019-11-14 | 2019-11-14-0842-BKMS-Statistics | Excel | 4 KB | Evaluation of report page | All | 2019-11-01 - 2019-11-02 | X |
| 2019-11-14 | 2019-11-14-0840-BKMS-Statistics | Excel | 18 KB | Evaluation of report page | All | - | X |
| 2019-11-12 | 2019-11-12-1537-BKMS-Statistics | Excel | 5 KB | Evaluation of report page | All | - | X |
| 2019-11-12 | 2019-11-12-1530-BKMS-Statistics | Excel | 16 KB | Evaluation of report page | All | - | X |
| 2019-11-11 | 2019-11-11-0851-BKMS-Statistics | Excel | 4 KB | Evaluation of report page | All | - | X |

 Please note, the system authorizes only 15 "archived" reporting in the system.



Press ok to start the file download

4.7.5. Attachments

List shows the attachments submitted by the whistle-blower, along with the date of submission and the file name, and, if applicable, the date of the download and of deletion, along with the Examiner Alias. By selecting a file using the radio button, you can "Download" the file to a local PC or server.

BKMS® System Crédit Agricole S.A.
ZANUCCHI-GARNIER, Celine

Report Processing - ID 113 ACKNOWLEDGE & CLOSE | CLOSE

Category: Breach of trust Relevance: B. Medium Status:  Postbox existent 

moyenne



• 2020-04-09 Enable closure (ZANCE) (6)
autoriser la clôture

• 2020-04-09 Anonymisation 1 (ZANCE) (7)
Anonymised activity: 0
anonymisation

• 2020-04-09 Restore original (ZANCE) (8)
Restored activity: 0
Restaurer l'original

Attachments

| Selection | Received | File name | Download | Deleted |
|----------------------------------|------------|-----------------|----------|---------|
| <input checked="" type="radio"/> | 2019-05-15 | test-ajout.xlsx | | |
| <input type="radio"/> | 2019-05-15 | Image1.JPG | | |

 Download  Delete

PROCESSING

Comment

Answer

More functions

ASSIGNED EXAMINERS

ZANCE

REMINDER

2020-04-30

STATISTICS

Include in statistics

ARCHIVING

If the whistleblower has not attached any files to her/his report, the blue row displays the wording "No available attachments".

4.8. Report reception outside the Group Tool (BKMS)

The employee reports an incident to his manager:

- ⇒ The manager encourages the employee to use the whistleblowing tool (BKMS).
- ⇒ The manager is subject to confidentiality.

The Compliance division receives a report (email, phone, etc.):

- ⇒ The compliance officer forwards the report to the referent who enters the report in the BKMS tool.
- ⇒ The compliance officer is subject to confidentiality.

The referent receives a report (email, telephone, etc.):

- ⇒ He enters the file on the BKMS tool with the following link.

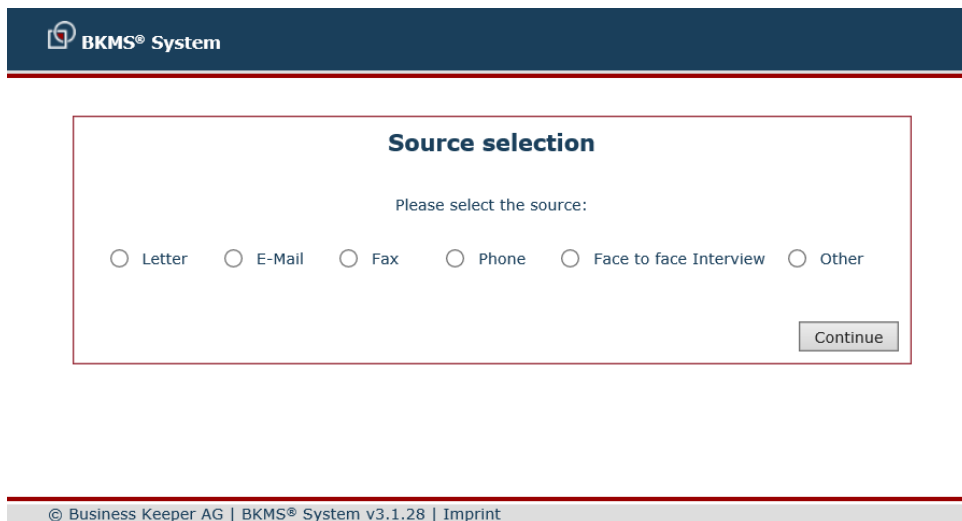
This is the link to reach the source selection page:

English:

<https://client.bkms-system.com/bkwebanon/client/clientSendReport?cin=3CAgr18&language=eng>

French:

<https://client.bkms-system.com/bkwebanon/client/clientSendReport?cin=3CAgr18&language=fre>



The screenshot shows the BKMS System logo at the top. Below it is a white box titled "Source selection" with the instruction "Please select the source:". There are six radio button options: Letter, E-Mail, Fax, Phone, Face to face Interview, and Other. A "Continue" button is located at the bottom right of the selection area. At the bottom of the page, there is a footer with the text "© Business Keeper AG | BKMS® System v3.1.28 | Imprint".

The person selects the source, and then he will have to input all the information of the report.

5. BKMS SYSTEM AUTHORIZATION

5.1. The “4 eyes principle”

The alert processing device is secured by the principle of the double check (principle of 4 eyes) so that only one person cannot analyse and definitively close a file.

- If the file is processed within the main entity (Regional Bank or FLGE), the referent must designate 2 persons (+ 2 back-up):
 - A person (+ his back-up) who has the possibility of analysing the file and proposing the closure of the file (analyst profile)
 - A person (+ his back-up) who has the possibility to close the file (supervisor profile)
- If the file is processed within a subsidiary entity (delegation of file analysis), the referee must designate 1 person + 1 back-up who has the possibility to analyse the file and propose closing of the file (analyst profile). The closure of the file will be done:
 - Either within the subsidiary by the local referent (supervisor profile) and under the supervision of the FLGE Referent
 - Either within the FLGE by the FLGE Referent


5.2. Enabling/ deleting access authorizations

Authorizations/ clearances for the Group tool (BKMS) are centralized at the level of Crédit Agricole SA - Compliance Department.

Each entity wishing to authorize an employee to use the Group tool (BKMS) must use the authorization request form (see Appendix 2) and sends it to the FLGE referent for validation.

After validation, the FLGE referent sends the document to Crédit Agricole SA – Compliance Department for rights opening in the group tool (BKMS).

Please contact the following e-mail address for any authorization request and use the authorization request form (see appendix 2): admin.ethicsalerts@credit-agricole-sa.fr

 **WARNING:** Access rights are granted under the responsibility of the FLGE referent.

In case of mobility of a collaborator, the entity must report it immediately to: admin.ethicsalerts@credit-agricole-sa.fr for deactivation of the rights.

| TOOL PROFILE | TOOL AUTHORIZATION |
|--------------------------|--------------------|
| Supervision level | Closure |
| Analyst level | Enable closure |

6. CONTROLS

At the entity or FLGE level

The Entity or FLGE referent sets up second-degree controls to ensure the correct application of the alert procedure. Is about :

1) Treatment of alerts: the control includes the following check points:

Sending an acknowledgment of receipt to the Whistleblower

Alert admissibility analysis

Processing the alert within the allotted time

Closing information to the Whistleblower

Compliance with the reporting of proven corruption cases to Crédit Agricole SA in accordance with the 2018-43 procedure (in connection with a 2.2 C control)

2) Protection of whistleblowers: the control includes the following check points:

Respect for confidentiality rules: The people included in the confidentiality circle, on an ad hoc or recurring basis, have signed a confidentiality agreement.

Compliance with the rules of access to BKMS: In the event of a change in the position of a person authorized to BKMS, the information was sent to DDC Crédit Agricole SA (admin.ethicsalerts@credit-agricole-sa.fr) for deactivation login / passwords.

At the same time, Internal Audit will periodically conduct missions aimed at ensuring the internal control system, in particular the correct implementation and effectiveness of first and second level controls.

At the level of the Crédit Agricole Group :

The Group referent sets up controls to ensure that:

People authorized to use the Group tool (BKMS) are authorized and still in post (annual periodic accreditation review)

Corruption cases reported via BKMS are subject to specific monitoring within the entities (measures taken and action plan).

In addition, DDC Crédit Agricole SA will carry out a semi-annual extraction of the logs.

APPENDIX 1 - CONFIDENTIALITY AGREEMENT



Date,

SUBJECT: Confidentiality Agreement

To whom it may concern,

You participate in the investigation of the case called “ _____ ”, hereinafter referred to as the “Case”.

In the context of the investigation, you will have access to information, documents, etc., of any nature and on any media, in written or verbal form, hereinafter referred to as the "Information(s)". The Case and this Confidentiality Agreement are also Information themselves.

All Information provided to you or to which you have access shall be treated, as strictly confidential and shall not, under any circumstances, be disclosed directly or indirectly to third parties, unless required by laws or with your consent.

You hereby undertake to:

- Take all measures to ensure the strict confidentiality of Information, both internally and externally;
- Use the Information only for the sole purpose of the Case examination;
- You ensure that all Information regarding the Case is only transmitted to authorised persons within the framework of the Case, namely _____, hereinafter the “Authorised Persons”;
- Not to keep, in any form, any Information.

Any communication, in any form, to other persons than Authorised Persons would constitute a breach of this Confidentiality Agreement.

You are required to respect this Confidentiality Agreement both, during the Case investigation phase, and after the end of the Case examination.

In the event of a change of position, you will remain bound by this Confidentiality Agreement's obligations.

Your attention is drawn to the fact that any violation of this Confidentiality Agreement should be seriously prejudicial to Crédit Agricole S.A. or any person involved in the Case, and, if by your misconduct, you may incur sanctions.

Would you be so kind as to send us a duly signed, completed, and dated copy of this Confidentiality Agreement.

Best regards

Head of Group Compliance

Crédit Agricole S.A.

Read and approved

Montrouge, on..... by

APPENDIX 2 - APPLICATION FOR AUTHORIZATION

REQUEST FOR AUTHORIZATION / REMOVAL OF AUTHORIZATION

Tick the corresponding box

- Request
- Removal
- Modification

Date of request (JJ/MM/AAAA):

Person concerned:

Entity:

First Name(s):

Name:

Email:

Authorization level:

Analyst profile
Proposes to close an alert

Supervisor profile
Closes an alert

Perimeter (entities concerned):

Signatories:

| FLGE Referent | Group Referent | Sys Admin |
|---------------|----------------|-----------|
| Name | Name | Name |
| Date | Date | Date |
| Signature | Signature | Signature |

The document has to be sent to the following address: admin.ethicsalerts@credit-agricole-sa.fr

CONFIDENTIALITY AGREEMENT

The whistleblowing right exercises in an environment of strict confidentiality that will allow him/her to report the facts while protecting his identity. Therefore, the Referent treats the alerts with the strictest confidentiality and only shares the reported information with third parties whose involvement is essential for treating the alert. This includes the Alert Management Committee and a team of identified investigator(s) or expert(s), also subject to strict confidentiality.

All Confidential Information communicated to you or to which you will have access must not, under no circumstances, directly or indirectly, be disclosed to third parties, without limitation of duration, including in the event of any change of position or function.

It is understood by Confidential Information, in any form whatsoever (written, verbal, computer or other), and this list is not exhaustive:

- All information concerning the identity of the issuer of an alert and the persons covered by the alert as well as the information collected by all the recipients of the alert,
- All technical and operational information necessary to gain access to the alert management tool

You hereby agree to:

- Preserve the most absolute secret about the Confidential Information that has been or will be transmitted to him or to which he will have access and take all the measures to ensure the strict confidentiality of the Confidential Information, both internally and externally,
- Use the information only for the alert's instructions,
- To give access to this Confidential Information or to disclose only to the Authorized Persons (Referent, Supervisor, Analyst, and other person intervening punctually in the processing of a specific file),
- Take all appropriate measures to ensure the protection and integrity of the Confidential Information,
- Do not retain in any form any information.

Confidential Information cannot be disclosed except as required by law, particularly in the context of a request from a judicial authority.

We draw your attention about the fact that the non-compliance of this confidential agreement is susceptible to cause a serious harm to your entity (Regional Banks or subsidiaries), to the Crédit Agricole Group, to the whistle-blower and to the persons targeted by the report, and that can give sanctions including disciplinary sanction.

Name and first name :

Date and Signature :

The document has to be sent to the following address : admin.ethicsalerts@credit-agricole-ss