

Whistle-blowing procedure

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(The French version prevails)

1. General framework

The Sapin II Act of December 9, 2016 on transparency, the fight against corruption and the modernization of economic life defines the protection framework for whistleblowers.

In addition to the Sapin II Act, ordinary law no. 2022-401 and organic law no. 2022-400 of March 21, 2022 respectively aim to improve the protection of whistle-blowers and strengthen the role of the rights defender in whistle-blowing.

A whistleblower is a natural person who reports or discloses, without direct financial consideration and in good faith, information concerning a crime, an offence, a threat or harm to the general interest, a violation or an attempt to conceal a violation of an international commitment, European Union law, the law or regulations. Where the information has not been obtained in the course of the professional activities mentioned in I of Article 8, the whistleblower must have had personal knowledge of it.

The alert may concern any information relating to a crime, an offence, a threat or harm to the general interest, a violation or an attempt to conceal a violation of an international commitment, European Union law, the law or regulations.

This procedure applies first and foremost to the employees of ABC arbitrage Group and its subsidiaries, but all stakeholders in the activities of ABC arbitrage Group and its subsidiaries

This document constitutes an internal policy drawn up for the exclusive use of the ABC arbitrage Group. It summarizes the essential principles and commitments defined according to the Group's specific characteristics, such as its size, the nature of its activities and its operational particularities. It is the property of ABC arbitrage and is intended for its use. Its contents cannot be generalized or applied to other entities or organizations.

may also issue an alert if they consider it relevant.

2. Alert types

- **Alerts relating to the management company:** if the facts in question are linked to a breach of European legislation, the Monetary and Financial Code or the AMF General Regulation.

Example: MAR regulations, insider dealing, AMF regulations, misappropriation of assets, Short Selling rules, etc.

- **Classic alerts:** more generic cases described in paragraph 1.

Example: MAR regulations, insider trading, tax treaties, discrimination, harassment, misuse of assets, illegal employment, etc.

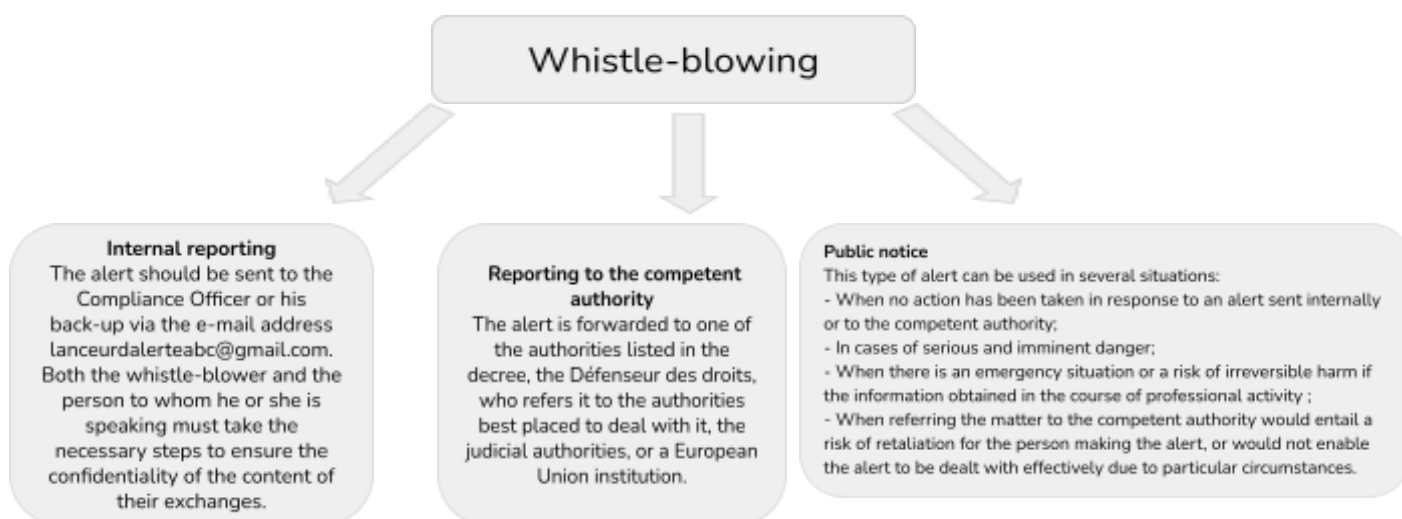
- **Other types of alerts:** breaches of ABC arbitrage Group rules and procedures.

Example: Responsible purchasing charter...

3. Whistle-blowing and handling alerts

Whistleblowers can choose their means of reporting without having to follow an escalation process. There are three means of reporting:

- Internal reporting ;
- Reporting to the competent authority;
- Public reporting.



3.1. Internal reporting

→ For Group employees: an alert can be sent by e-mail to lanceurdalerteabc@gmail.com with a personal address, or by post to 18 Rue du 4 septembre, 75002 Paris. It is advisable to put "Personnel" in the subject line and to specify

the employer.

→ For those who are not employed by an ABC arbitrage Group company: an alert can be sent by e-mail to lanceurdalerteabc@gmail.com or by post to 18 Rue du 4 septembre, 75002 Paris.

A confirmation of receipt of the alert will be sent to the sender, together with an indication of the reasonable and foreseeable timeframe for examining its admissibility, as well as details of the follow-up action taken, while respecting confidentiality obligations. If the alert concerns a matter falling within the remit of the *Autorité des Marchés Financiers* (AMF), it will be forwarded to the latter. In such cases, the AMF analyzes the information and decides what action to take, within the limits of its competence. If the AMF considers that the alert does not fall within its remit, it will inform the originator and redirect him/her to the appropriate body.

In the case of anonymous mail, no confirmation of receipt or information on the action taken will be sent to the sender.

This information will be recorded in a document which, for obvious reasons of confidentiality:

- will not mention the whistle-blower's name ;
- will not be shared with the whistle-blower;
- will be accessible only to the aforementioned Compliance and Internal Control Officer.

The handling of alerts falls under the responsibility of the Head of Compliance and Internal Control (RCCI), who works in coordination with the Secretary General and, when necessary, with the relevant departments. The receipt, analysis, and follow-up of reports are conducted in strict compliance with the confidentiality of the information provided and the identity of the whistleblower, as well as with the principles of independence.

The elements constituting the alert will be destroyed within a maximum of two months from the closure of the admissibility or verification operations if no action is taken, and within 5 years otherwise. The author of the alert and the persons concerned will be informed of the closure of the investigation by e-mail.

3.2. To send an external alert to the *Autorité des Marchés Financiers* (AMF)

Whistleblowers who decide to notify the AMF directly must complete the following form:

[Whistleblower | AMF](#)

3.3. To send an alert via a public notice

The whistleblower must be faced with one of the following four situations:

- No action has been taken in response to an internal alert or to the competent authority;
- In the event of serious and imminent danger;
- There is an emergency situation or a risk of irreversible harm;
- Referring the matter to the competent authority would entail a risk of reprisal for the person making the alert, or would not enable the alert to be dealt with effectively due to particular circumstances.

Whichever of the above three means of reporting is chosen, the author of the alert must :

- provide the facts, information and/or documents, in whatever form or on whatever medium, to support the alert;
- provide the elements required for an exchange with the recipient of the alert.

3.4. Analysis and investigation of reports

Once a report is received, the analysis and investigation process proceeds as follows:

- Acknowledgment of receipt of the report sent to the whistleblower when their identity is known.
- Review of the report's admissibility by the RCCI to verify its validity
- Initiation of an internal investigation when the information provided warrants it, or closure of the case if not
- Assessment of the facts and risks by the relevant departments (compliance, legal, human resources, etc., depending on the nature of the report).
- Decision on the appropriate course of action, which may include corrective or disciplinary measures or a report to the competent authorities.
- Closure of the case, archiving, reporting, and any remedial measures, in accordance with applicable confidentiality and retention rules.

4. Whistleblower protection

The Group is formally committed to protecting whistleblowers from any form of discrimination, disciplinary action, intimidation, or other retaliatory measures resulting from a report made in good faith. It enforces a zero-tolerance policy toward any form of retaliation. No adverse action may be taken against a person who has made a report, particularly with regard to hiring, compensation, promotion, training, disciplinary action, or termination of employment. This is in accordance with the legal framework, which provides for the protection of the individual who is the author of the report and/or the legal entity associated with the whistleblower, as detailed in the Labor Code (Article L1121-2 in

particular). Protection also applies to the facilitator, that is, any natural person or private-law non-profit legal entity that assists a whistleblower in making a report or disclosure in accordance with the law.

All information concerning the whistleblower as well as that transmitted as part of a report is confidential and treated in compliance with the RGPD regulation. In the event of disclosure sanctions will be applied. Information enabling the whistleblower to be identified may only be communicated with his or her consent.

The law exempts whistleblowers from civil liability. They are also exempt from criminal liability, as stipulated in article 122-9 of the French Penal Code.

In addition to all these protective measures, whistleblowers can also benefit from financial support measures

In the event of disclosure of confidential information concerning the whistleblower, the law provides for a civil fine of up to 60 000 euros.

Finally, [the Defender of Rights](#) can help whistleblowers in their efforts to protect their rights and freedoms. He can inform, guide and protect whistleblowers by :

- responding to requests for information on how to implement the rules governing whistleblowers;
- directing the whistleblower to the competent body to put an end to the facts denounced, or investigating the report itself when an alert falls within one of its four areas of competence (children's rights, defence of users of public services, ethics of the security forces and discrimination);
- protecting the whistleblower against reprisals in connection with the alert;
- issuing an opinion on the status of whistleblower, to ensure that the person concerned is fully protected, regardless of the regime applicable to the whistleblower.

5. Follow-up and communication

Like the other charters and codes of conduct, the whistle-blowing procedure is presented to all new arrivals and is freely accessible to all employees. Their contents are the subject of reminders, and a review with the Head of Internal Compliance and Internal Control (RCCI) to ensure that the procedures have been properly understood is systematically organized within 6 months of employees taking up their duties. Every year, employees are formally asked to confirm that they have read the main procedures and regulations, and in-house training is offered via the ABC University program.

ABC arbitrage will publish information on the number of alerts received and any breaches of this policy, as well as any remedial action taken.