



Cartan Trade — Global Whistleblowing Procedure (Group)

1. Purpose & Legal backbone

As part of its corporate responsibility and its commitment to strengthening integrity, ethical conduct, and regulatory compliance across all its operations, Cartan Trade Group has adopted a comprehensive whistleblowing framework aligned with the European Union Whistleblowing Directive (EU) 2019/1937) and the corresponding national transpositions within the countries in which the Group operates. These include, in particular, the French Law n°2022-401 of 21 March 2022 and Decree n°2022-1284 of 3 October 2022 establishing procedures for the collection and handling of whistleblower reports and defining competent external authorities.

For the United Kingdom, where Cartan Trade operates through its affiliates, the Group ensures compliance with the Public Interest Disclosure Act 1998 (PIDA), which provides the legal framework governing protected disclosures and prohibits retaliation against individuals raising concerns of public interest.

Within this protective regulatory environment, Cartan Trade's whistleblowing system is designed to:

- enable the internal reporting of potential or actual breaches of EU, local, or international law; breaches of the company's policies; threats to the public interest; or other serious misconduct likely to occur within the organization;
- ensure the secure intake, verification, and appropriate handling of reports through impartial and confidential processes, in accordance with applicable legislation;
- offer whistleblowers the choice between internal reporting, external reporting to a competent authority, or under the strict conditions defined by the law public disclosure.

While existing internal channels remain available to employees (e.g., management, HR, staff representatives), the whistleblowing procedure outlined in this document establishes a dedicated, secure mechanism ensuring that concerns can be raised safely, effectively, and without fear of retaliation.

This Procedure explains how to raise concerns, how Cartan Trade receives, assesses, and follows up on them, and the protections against retaliation

2. Scope — Who can raise a concern?

Anyone with a work-related connection to Cartan Trade can report in good faith, including: employees (permanent/temporary), former employees, applicants, interns, agency workers, directors, contractors/subcontractors,(when they act for or on behalf of the company).

It is understood that Cartan encourages all people concerned to report even in case of doubt, as no one shall be penalized for filling a report in good faith.

3. What can be reported?

Report any reasonable suspicion of actual or likely wrongdoing, including breaches of law or regulation, Cartan Trade policies, or public-interest risks, for example: financial crime/AML, market abuse, insurance-intermediation breaches, product governance/sales practices, data protection, competition/antitrust, health & safety, environmental harm, fraud, bribery or concealment of any such matter.

3. Procedure for Handling Reports

3.1 Submitting a Report (Internal Reporting Channel)

Reports can be submitted 24/7 exclusively through Cartan Trade's confidential reporting mailbox:

Dedicated Email (sole reporting channel): whistleblowing@cartantrade.com, which is operated under strict access controls and is accessible only to the Whistleblowing Committee.

Reports must be submitted in the form of a written and substantiated statement, duly dated and signed. As a general rule, the reporting person shall identify themselves; however, their identity will be treated with the highest level of confidentiality.

Reports may be submitted in English, Spanish, French, Italian, or Dutch.

Anonymous reports will be processed only where permitted under applicable local law.

Upon receipt of a report, the Legal & Compliance Manager, acting confidentially, will send the whistleblower the standard reporting form attached to this Procedure, in order to collect all relevant information needed for assessment and follow-up.

What to include in the report:

- Description of the facts (who, what, when, where)
- Any available evidence
- Any prior reporting actions or channels used
- Any risk or fear of retaliation

Acknowledgement and follow-up: Cartan Trade will acknowledge receipt of the report within 7 days and will provide feedback within 3 months regarding the actions taken or planned, in accordance with confidentiality obligations and legal constraints.

3.2 Processing a report

3.2.1 Case Owner (Responsible for handling)

The alert will be handled by the Whistleblowing Committee, consisting of Chairperson (the "CEO"), the Chief Corporate Officer (the "CFO & HRD") and the Legal & Compliance Manager, and, if applicable, the manager of the concerned team.

3.2.2 Treatment modalities (channels, acknowledgement, admissibility, follow-up)

- **Reception channels:** as per specified in 3.1
- **Acknowledgement:** Within a maximum of seven working days following receipt of the alert, the Whistleblowing Committee shall send the Whistleblower an acknowledgment of receipt via the secure mailbox.

The acknowledgment of receipt informs the Whistleblower that he/she may be contacted to provide additional information, that they will receive a response indicating whether their report is admissible and what follow-up actions will be taken, and that they will be informed once the procedure has been closed.

- **Investigation:** As soon as a report has been received, the Whistleblowing Committee will determine the appropriate stakeholder to conduct the investigation or consult for assistance in the investigation, while still ensuring the confidentiality of the process to the extent permitted and required by law. Each investigation is unique, and the process depends on a variety of factors. No matter what, each and every Whistleblower report is taken seriously and receives a fair and thorough review.

The files and information gathered by the Whistleblowing Committee and those investigating the Whistleblower Report are kept confidential to limit access by others except as required by law. When relevant and required, a summary of incidents and reports under investigation are reported without the names of the individuals involved or any details that would reveal someone's identity– to the relevant Board and executive committees. Where strictly necessary, reports are shared with members of senior management on a confidential basis.

- **Feedback:** Within a maximum of three months, outcome information will be provided to the extent permitted by law
- **Record-keeping & data retention:** Records will be retained no longer than necessary to meet legal, investigative, and audit requirements, in accordance with GDPR and

supervisory authority guidance

- **Confidentiality & data protection:** The identities of the whistleblower, the persons named in the report, and any third parties are kept confidential and are disclosed only when required by law or strictly necessary for follow-up, and always with appropriate safeguards

4. External reporting (by country)

If the Whistleblower prefers, or if internal handling is not appropriate, he/she may report directly to a competent authority below. (This does not affect their protection if legal criteria are met.)

France

- ACPR (prudential & conduct for banking/insurance/intermediaries): online form / postal / phone.
- AMF (markets/securities) and DGCCRF (consumer protection/competition) – designated under Decree 2022-1284.
- Autorité de la concurrence (anticompetitive practices/state aid).
- Défenseur des droits (guidance/orientation for whistleblowers).

Italy

- ANAC (National Anti-Corruption Authority) — external channel per Legislative Decree 24/2023 and ANAC guidelines.
- IVASS (insurance supervision), CONSOB (securities), Bank of Italy/PRA for prudential areas where relevant.

Netherlands

- Huis voor Klokkeluiders (advice, investigations; protection against reprisals).
- AFM (financial markets) and DNB (prudential) reporting channels available.

Spain

- Autoridad Independiente de Protección del Informante (A.A.I.) – authority created under Law 2/2023, competent for external whistleblowing reports and the protection of whistleblowers.
- CNMV – supervision of financial markets.
- Banco de España – banking and prudential supervision.
- Dirección General de Seguros y Fondos de Pensiones (DGSFP) – supervision of the insurance and pension funds sector.

Belgium

- Data Protection Authority (APD/GBA) – external reporting channel for data protection violations.
- FSMA – supervision of financial markets and intermediaries.
- National Bank of Belgium (BNB) – prudential supervision.
- Belgian Competition Authority – anticompetitive practices.
- For the public sector, external reporting channels are organised by the Federal Ombudsman, in accordance with the Belgian Law of 28 November 2022.

Luxembourg

- CSSF (Commission de Surveillance du Secteur Financier) / Prudential Control and Resolution Authority (ACPRL) – external reporting channel for financial entities, markets, investment funds and insurers.
- CNA (National Archives Commission, depending on the subject) and CNPD – for data protection matters and related violations.
- Competition Authority – anticompetitive practices and market issues.

United Kingdom

- FCA (conduct/markets) and PRA/Bank of England (prudential): prescribed persons under PIDA.
- ICO (data protection), HMRC (tax), SFO (serious/complex fraud), and others on the UK prescribed persons list.

Public disclosure: In narrowly defined circumstances (e.g., imminent danger or risk of retaliation), public disclosure may be protected under EU/national laws; requirements vary by country. Seek advice or contact the competent authority first.