

WHO  
WE ARE



The Bank's Board of Directors and Senior Management firmly believe that the success of My Money Bank & its subsidiaries (our Group) depends on the behaviour of each and every one of us.

Our future is linked to our professional expertise and integrity.

We must share the commitment and trust of all our Group employees, partners, customers and shareholders. Inherently, to do so, we need to rigorously apply laws and regulations. But we need to go beyond this and ensure that every decision we make reflects a deep sense of ethical responsibility.

This is the mindset reflected in our Code of Conduct.

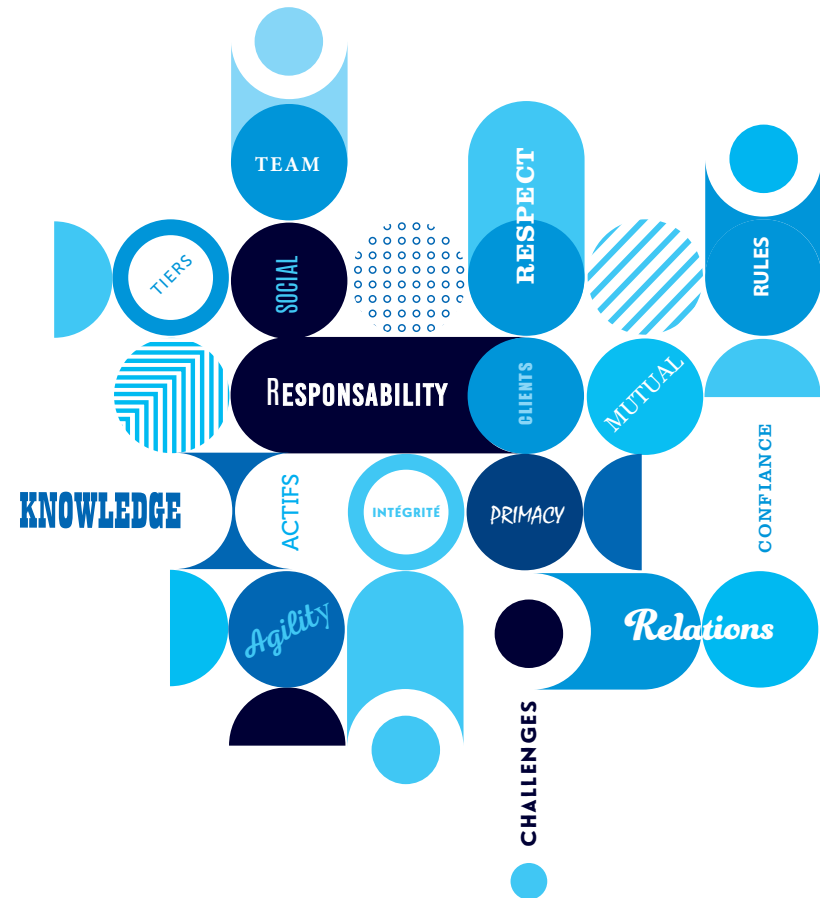
It sets out the rules for conducting our business enshrined in our values and it guides the way we should think and behave. It is a statement of who we are.

**Éric Shehadeh**, CEO de My Money Bank

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The "Code of Conduct" reflects the collective vision of all My Money Bank employees & subsidiaries. Our values and principles have been forged by a participatory process involving all bank employees.

Respecting and adhering to these values on the part of each of us is fundamental to pursuing our transformation and growth strategy while maintaining the trust of our customers, employees, shareholders and broader society.



THE "CODE OF CONDUCT" PROVIDES EACH EMPLOYEE WITH AN ETHICAL FRAMEWORK THAT HELPS GUIDE THEIR ACTIONS AND ENSURE CORRECT DECISION-MAKING.

THE PRINCIPLES SET OUT IN THE CODE REPRESENT A CLEAR SET OF COMMITMENTS UNDERPINNED BY OUR VALUES AND THEY FORM THE BASIS OF THE COMPANY'S POLICIES AND PROCEDURES.

AS EMPLOYEES, IT IS OUR RESPONSIBILITY – REGARDLESS OF SENIORITY – TO PROMOTE AND EMBODY THE VALUES AND PRINCIPLES ENSHRINED IN THE "CODE OF CONDUCT" DAY IN, DAY OUT, IN OUR WORK WITH COLLEAGUES AND CUSTOMERS.

WE ALSO WORK TO ENSURE THAT OUR PARTNERS, SUPPLIERS AND OTHER EXTERNAL RELATIONS COMMIT TO OUR VALUES AND PRINCIPLES WHEN DEALING EITHER DIRECTLY WITH THE COMPANY OR ON ITS BEHALF.

ASSERTING OUR COMMITMENTS UNEQUIVOCALLY IN OUR CODE OF CONDUCT ILLUSTRATES OUR WISH TO CONTINUE TO BE A RESPONSIBLE BANK THAT SEEKS TO BUILD ITS FUTURE AND ITS SUCCESS ON SOLID ETHICAL FOUNDATIONS AND INTEGRITY.

DETAILED PROCEDURES CONCERNING THE APPLICATION OF THE PRACTICES SET OUT IN THE CODE OF CONDUCT AT OPERATIONAL LEVEL ARE AVAILABLE ON THE COMPANY'S INTRANET OR UPON REQUEST FROM MANAGERS.



- Seizing every growth opportunity
- Testing, sharing and deciding with agility
- Innovating with both our employees and customers

- Capitalising on our results-oriented culture
- Placing profitability at the heart of value creation
- Meeting and exceeding the Company's objectives

- Recognising our employees' commitment
- Communicating in complete transparency
- Committing ourselves

- Managing change
- Being on the lookout for new ideas
- Investing in talent and training

**Promoting our customers' interests at all times and helping to ensure that My Money Bank & its subsidiaries are recognised as responsible lenders.**

We are committed to being a responsible lender in ourin the day-to-day conduct of our business. Being receptive to our customers' needs, providing them with independent advices, informing them in a clear and transparent manner and seeking to come up with a solutions at all times are at the heart of our concerns and commitments.

*A customer wishes to refinance their debt . Upon analysis, it turns out that this solution is neither in line with their economic interests nor adapted to their profile. After numerous discussions, the customer is not interested in any other solution and threatens to change banks. What should I do?*

*If the customer has been given the time and information necessary to understand the situation, you should suggest one or several other appropriate solutions. If necessary, ask your manager for guidance. Customers' long-term interests and the reputation of My Money Bank must take precedence over short-term gain and you need to explain this in a clear manner to your customer and turn down their request if no other solution can be found.*

- ✔ We listen to what our customers have to say and then act in a spirit of respect, fairness and honesty to earn their trust.
- ✔ We act in the interests of our customers, offering responsible, flexible and customised solutions, adapted to their needs and circumstances.
- ✔ Thanks to our expertise, we provide our customers with value by fulfilling our duty to in advising them and by sharing these principles day in, day out with all our partners.
- ✔ We offer solutions in a transparent manner, providing customers with clear and objective information they can use to assess the extent of their commitments and the possible risks, so they can make the best possible choice.
- ✔ If customers' wishes are not aligned with their interests, we do not hesitate to suggest other solutions or to turn them down if necessary.
- ✔ We work with our customers experiencing financial difficulties in order to come up with the best solution for them.

**Contributing to the success and attractiveness of My Money Bank & its subsidiaries by fostering a team spirit and exercising our responsibilities with due respect for each others.**

Being an employee of My Money Bank or one of its subsidiaries means working for a responsible employer committed to equality fairness and the principle of non-discrimination, who encourages personal development and provides a working environment in which all employees are treated with dignity and respect.

- ✔ A team mindset and teamwork among colleagues, business lines and functions is encouraged to ensure that the mission and project are successful.
- ✔ We build and maintain trust-based relationships by promoting mutual support and respect.
- ✔ We encourage diversity in both profiles and career paths: this reflects the depth of talent and expertise of the women and men who work here.
- ✔ The care shown to our employees and the respect for their private lives allows each and everyone to fulfil their personal and professional commitments.

*I witnessed one of my colleagues making inappropriate sexist remarks to another colleague. What should I do?*

*Each employee has a duty to create and maintain a working environment in which dignity is respected. Victims of discrimination should not feel that such practices are ignored or trivialised. You may take action on behalf of the people concerned. We are all responsible for our Company's image. By behaving in a responsible and ethical way, we refrain from any action that could damage its reputation or tarnish its image.*

**Being aware of the consequences and impacts of our actions and decisions on our customers and the Company.**

We are all responsible for our Company's image. By behaving in a responsible and ethical way, we refrain from any action that could damage its reputation or tarnish its image.

*One of my key partners has asked me for advantageous treatment concerning the renewal of a distribution contract, stressing our long-standing business relationship. To smooth their request, they are also offering me VIP seats at a big sporting event. Am I allowed to accept this invitation?*

*Granting beneficial treatment on a product or a loan in exchange for gifts, invitations or other benefits constitutes a type of corruption risk. Even if the employee refuses to actually grant beneficial treatment on a contract, this situation places him or her under suspicion and represents a risk for My Money Bank. In order to protect both you and the company, this matter should be reported to your manager and to the Compliance department.*

- ✔ We are responsible for ensuring the compliance of our actions and decisions and we act in full awareness of the consequences of these.
- ✔ We conduct our business in a way that leaves no room for doubt in respect of our integrity and ethics.
- ✔ Our irreproachable behaviour enhances the Company's image.
- ✔ We are careful not to favour any specific interests to the detriment of the interests of our Company or customers. Specific situations are dealt with in liaison with our stakeholders in a transparent manner.
- ✔ We safeguard our independence by refusing any payments, gifts, invitations or benefits in kind that could influence our behaviour or the behaviour of a third party.
- ✔ We undertake to prohibit all forms of corruption, in particular by refusing any offers or illegal commissions or by engaging in such practices ourselves.
- ✔ We take care not to involve the Company or any of its subsidiaries in any public activities or responsibilities that we may exercise outside of My Money Bank without prior explicit approval.

**Maintaining relationships based on equality and loyalty with our partners and stakeholders, in the interests of our customers.**

We strive to build trust-based relationships with our partners by looking after the interests of all parties, in line with clear contractual terms and conditions negotiated in a fair and loyal manner. We use all means to ensure that each of our intermediaries, suppliers and service providers comply with equivalent principles to those set out in our "Code of Conduct".

- ✔ We act with fairness and integrity towards our partners (i.e., intermediaries, suppliers or service providers) and stakeholders, thereby maintaining mutually beneficial relations.
- ✔ We share our values and principles set out in the "Code of Conduct" with our partners and stakeholders.
- ✔ When required to do so, we are committed to fully cooperating with the relevant authorities.
- ✔ We promote healthy competition and ensure that our competitive advantage is based exclusively on our expertise, the excellence of the advice we provide, and on the quality of our products and services.

*I have received information or heard rumours concerning the CEO of one of our partner companies relating to a case of fraud. What should I do?*

*You should report the matter to your manager or to the Compliance department, who will decide on the appropriate course of action with regard to this partner, in line with My Money Bank's risk assessment and risk appetite. Under no circumstances should you use this information to pressure or threaten the partner in any way.*

*One of our partners has asked me for information about another partner. Am I allowed to give this information?*

*No, under no circumstances may information about competing partners be disclosed outside the Company. The integrity of the Company vis-à-vis its partners is at stake and this situation could also lead to cases of unfair competition in which the Company would have played a role.*

**Protecting and strengthening My Money Bank & its subsidiaries to safeguard the long-term viability of its business.**

We are committed to protecting the assets of My Money Bank and its subsidiaries together with data of a sensitive, confidential or personal nature, with the common objective of enhancing the Group's value and financial strength.

- ✓ Every single customer and partner relationship is treated as strictly confidential in line with banking secrecy provisions.
- ✓ We realise how important it is for our customers and employees to maintain control over the confidentiality of their personal data.
- ✓ Strategic and confidential information concerning our customers, employees and partners is protected and secured or, where appropriate, used in an ethical and transparent manner.
- ✓ Each of us helps to protect and use all of our property and equipment and intangible assets in an appropriate manner to preserve the value of the Company.

*A colleague has asked me for personal information about a customer that I know well. Am I allowed to give this information?*

*No. Under no circumstances may personal information that has not been officially disclosed with the customer's consent be passed on either internally or to a third party outside the company.*

**Being familiar and complying with the laws and professional and ethical guidelines that provide the framework for conducting the business of My Money Bank and its subsidiaries.**

All directors, corporate officers and employees – regardless of their entity or geographical location – are committed to understanding and complying with the laws, regulations, professional standards and procedures applicable to their entity in a responsible manner..

- ✓ We conduct our business and attempt to solve any problem encountered in accordance with the law and ethical guidelines.
- ✓ Available in-house resources are used to track and apply the regulatory changes impacting our businesses.
- ✓ We act in a responsible manner when an employee feels there are good reasons to consider that a situation does not comply with the values, principles and policies applicable in the conduct of our business.
- ✓ Depending on the situation, we may report the matter to senior management, seek advice from the Compliance or Human Resources department or use the whistleblowing facility available via the OMBUDS system.
- ✓ Raising the alarm is beneficial because it enables us to detect and tackle situations of non-compliance that could tarnish the Company's image in the eyes of its employees,

Whistleblowing is a right and no employee should be sanctioned, dismissed or subjected to discriminatory treatment, either directly or indirectly, for whistleblowing in good faith and in line with best practices.

*A colleague entrusts me with a major request for financing. When analysing the file, I realise that the colleague in question is related to the potential customer. What should I do?*

*The first step is to explain to the colleague that they must inform their manager and the Compliance department of the family link. By entrusting me with this file – without intervening in the business process itself – the colleague is protecting his/herself against any risk of conflict of interest.*

## Participating in the development of My Money Bank & its subsidiaries in a way that respects basic human and social rights and the environment.

Wherever we do business, we show the utmost respect for basic human and social rights and the environment. This commitment, which helps create value, should enable us to achieve excellence in our relations with our customers, partners and employees

- ✓ Our commitment to corporate social responsibility, sustainable development and human rights is shared by all employees.
- ✓ We encourage cooperation between people of different cultures, skills, experiences and backgrounds to onboard new employees and enable them to participate in our development.
- ✓ Recruitment, training, assessments and career development are based solely on individual merit and performance.
- ✓ Each of us is careful to use company resources responsibly and to factor environmental considerations into our decisions where appropriate.
- ✓ We help to make the workplace safe and secure and we report any activity or situation that may threaten the physical safety of a colleague or someone from outside the Company who is on our premises.

***I have witnessed racist comments made by my manager in the office. Who can I talk to?***

*As a witness to this situation, I have the protection of the Company and I may report the matter confidentially to the Human Resources department or to an OMBUDS, who will refer the matter to the appropriate people. It is essential that this type of situation – which is contrary to My Money Bank's human rights commitments – should not be allowed to happen again within the Company.*

## The "Code of Conduct" should guide all employees in their decision-making. However, no single rule can cover all the specific situations encountered in our day to day business activity

### What about the appropriateness of my action?

- ❓ Is it legal?
- ❓ Is my decision in line with the principles, values and rules applicable to My Money Bank & its subsidiaries?
- ❓ Do I have full knowledge and understanding of the risks involved in my decision?
- ❓ Could my action negatively impact our customers or the image of My Money Bank or its subsidiaries?
- ❓ Am I comfortable explaining my decision?
- ❓ If I put myself in the shoes of those impacted, would I still have taken this decision?

#### IF IN DOUBT, EACH EMPLOYEE MAY SEEK ADVICE AND GUIDANCE FROM:

- Their direct manager
- A manager outside of their chain of command
- The Compliance department
- The Legal Affairs department
- The Human Resources department
- An OMBUDS correspondent



## 1) What is an Ombuds?

- ✓ It is a mediator available to employees  
S/he may act as an intermediary between the employee and another person.
- ✓ **It is an additional means of recourse**
  - If other channels have not satisfied the employee's requirements or are not adapted to their need (manager, Compliance department, etc.).
  - Or directly, if the employees deem this to be useful.
- ✓ **It is part of an independent process**  
Without any hierarchical link to the employee's manager, Executive Management, HRD, Compliance, Legal Affairs, etc

## 2) The role of the Ombuds

- ✓ **They listen to employees in an impartial manner**
  - Impartially and objectively listening to employees without judging their requests.
  - Helping to reflect upon the right questions that need to be asked and finding the right people to talk to.
- ✓ **Contacts are treated confidentially**  
Confidentiality: the key aspect of the role.  
A mediator role IN ADDITION to an operational role  
Ensures a prompt and satisfactory response from the right people.

## How to report a problem

- ✓ **An employee has three possible solutions :**
  - - They may contact the Ombuds of their choice directly.
  - - They may send an e-mail from their own mailbox to ombuds@mymoneybank.com.
  - - They may anonymously use the Ombuds application available in the start menu on wyse and on the Citrix PC portal.
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**In order to protect against conflicts of interest, in the event of contact by email, the message will be forwarded directly to the Chairman of the Board, who will personally ensure that the case is handled correctly.**

- ✓ **Influence peddling** is an offence whereby a person holding public authority accepts gifts (money, goods) from an individual or company in exchange for granting or promising certain advantages (distinction, contracts, employment, favourable decision, etc.).

- ✓ **Corruption** is an offence, punishable by long prison sentences. Bribery refers to a specific type of behaviour defined in Article 435-1 of the French Criminal Code (Code pénal).

It is defined as: "proffering, without any right, at any moment, directly or indirectly, offers, promises, gifts, presents or any advantages, to induce a public official to perform or not to perform any act within their occupation, position or office, or facilitated by their occupation, position or office."

For the briber, corruption consists in giving an advantage to a person (the bribe-taker) so that they perform – or do not perform – an act that falls within the scope of their remit and prerogatives.

French law distinguishes between active and passive bribery.

Active bribery: when the briber initiates the bribery.

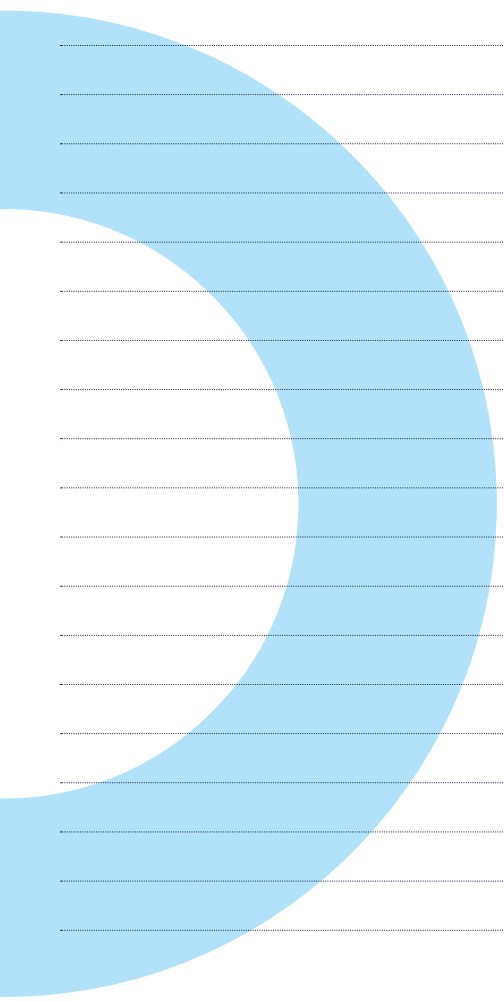
Passive bribery: when the bribe-taker initiates the bribery, in other words the person who performs – or does not perform – an act in exchange for some form of consideration.

- ✓ **A conflict of interest** arises when an individual or an organisation manages a number of opposing interests, at least one of which may hamper their willingness to deal with the others, or at least give this impression (which we refer to as the "appearance of conflict of interest").

A conflict of interest therefore arises where an individual has to perform a function of general interest but their personal interests are in competition with the mission entrusted to them by their organisation or company.

Conflict of interest is neither a civil nor a criminal offence under French law. It is the influence peddling and unlawful taking of interest that may result from a conflict of interest that are criminal offences.

**NOTES**



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