

Policy on Whistleblowing at Belfius Bank

A SPECIFIC AND ULTIMATE INTERNAL ALARM SYSTEM FOR REPORTING VIOLATIONS

1. What is whistleblowing?

“Whistleblowing” is a non-legal term used in English to designate the raising an alarm internally by someone who has observed a serious breach of conduct or violation.

For Belfius, whistleblowing is a very specific and ultimate internal alarm system that provides all employees, official governance-related bodies and managerial staff with the opportunity, with total confidentiality, to report any issues that may cause serious financial or reputational harm to Belfius in such a way that the company is able, in timely fashion, to prevent such harm from occurring and to make adjustments accordingly.

Whistleblowing is a procedure used in cases where the person making the report believes that no other internal procedures are appropriate and, in particular, when it is impossible or when the person believes that it is not appropriate to discuss (the suspicion of) the violation with his or her immediate superior(s).

For this reason, the whistleblowing procedure is characterised by a specific channel through which the violation can be reported directly to the Compliance Officer or, for AML-related offences, to the Anti Money Laundering Compliance Officer (hereinafter AMLCO). In very exceptional cases, the person making the report can approach the chairman of the Belfius Bank Management Board.

Anyone making a report in this context will also benefit from special protection against any adverse measures taken against him or her as a result of the report.

2. Features of the whistleblowing procedure at Belfius

> All employees, official governance-related bodies and managerial staff at Belfius, regardless of their hierarchical level, can use this alarm system

- > Any report must be based on proof (concrete, verifiable details, relevant and reasonably sure information) or serious suspicions. Rumours or gossip are not sufficient.
- > In principle, a report may be about any possible breach of the statutory, regulatory and prudential obligations with which Belfius must comply or which Belfius imposes on itself, its partners or suppliers, such as breaches of internal compliance rules in general, the integrity policy, the fight against money laundering practices and the financing of terrorism, corruption and abuse of power, etc. Non-business offences or problems associated with the implementation of an employment agreement, for example, are not dealt with via the whistleblowing procedure.
- > Whistleblowing must also relate to violations that may have serious financial or reputational consequences for Belfius. Examples include: a violation that may also result in sanctions imposed by the regulators or by judicial bodies; a violation that may lead to a significant loss of customers and/or a high level of dissatisfaction among a large group of customers; a violation that may be probed in an extensively negative way by the media, etc.
- > Important: the whistleblowing procedure is an exceptional procedure. The usual procedures must first be used, depending on the nature of the violation. For example, there is a specific duty of reporting for breaches of the AML legislation and of the regulations governing market abuse. The whistleblowing-procedure may only be used when it is impossible or is not thought to be suitable or appropriate to discuss (the suspicion of) a violation with the person making the report's direct superiors.
- > Anybody making a report in good faith can count on confidentiality and protection. However, anyone using the whistleblowing system in bad faith – i.e. with the intention of causing harm to Belfius or one of its employees, managers or similar persons – may receive sanctions. It is the Compliance Officer or the AMLCO who decides whether the report has been made in good faith or maliciously.

3. Confidentiality and protection

- > The Compliance Officer or the AMLCO is responsible for handling the details of the report with confidentiality.
- > The Compliance Officer or AMLCO will object to the disclosure of the identity of the person making the report or of third parties (such as witnesses) to any other department at Belfius, except where:
 - the person making the report or the third party gives formal consent to have their identity disclosed;
 - it is at the request of judicial or regulatory bodies that Belfius is obliged to cooperate with these bodies;
 - if, on an extremely exceptional basis, disclosure is absolutely necessary in the context of the internal investigation. In that case, all of the parties involved will be bound by the same duty of confidentiality as the Compliance Officer or the AMLCO. The person making the report may enquire of the Compliance Officer or the AMLCO as to whom his or her identity has been disclosed.
 - the person making the report or third parties has (have) made a report in bad faith: in that case, the person about whom the report has been made has the right to obtain the identity of the person making the report or the third party, but only once the internal whistleblowing procedure has been concluded.
- > Confidentiality must protect the person making the report against any adverse measures resulting from or relating to the reporting of an offence that the person is unable to report to his or her superiors. In that regard, an anonymous report, although not forbidden, is strongly advised against for the purposes of the proper handling of the report. Also, in the event of an anonymous report, the Compliance Officer or the AMLCO will not know who needs to be protected, meaning that there is a higher risk of the identity of the person making the report being inadvertently revealed during the course of the investigation into the alleged offence.
- > This means that information from a person making a report anonymously will be dealt with at the bank's discretion, on condition that the information itself is sufficiently concrete and clear and if it can be assumed that the report has been made in good faith.

4. The alarm system in practice

Think carefully and choose the channel you want to make the report.

- > You first need to decide whether you can go to your superiors with the report. If you can, then discuss the

problem with them in the first instance. They can then decide whether to involve the Compliance department. If you believe that such an approach is not possible or that talking about it with your manager is not opportune or appropriate, then you can approach the Compliance Officer or AMLCO.

- > If you do not think it is possible, opportune or appropriate to report your concerns to the Compliance Officer or AMLCO, for example because they might be among the group of persons to whom the report relates, then you can approach the chairman of the Management Board of Belfius Bank. In any event, the chairman is the person with final responsibility in all matters, AML included.
- > If the facts of the matter involve a director of Belfius Bank, then the Compliance Officer will pass the information on to the chairman of the Management Board or the chairman of the Board of Directors or the chairman of the Audit Committee of Belfius Bank. For AML-related matters, the AMLCO will pass the information on to the chairman of the Management Board.

If you opt to make your report to Compliance or to the chairman of the Management Board.

How do you contact the Compliance Officer or the AMLCO?

- > The first assessment of the issue should preferably be carried out verbally. An initial conversation is to be recommended because it makes it possible to assess whether the whistleblowing procedure is the most appropriate way of dealing with the report. Any additional documents or evidence can also be handed over in person at that time. Your identity is also known only to the Compliance Officer or the AMLCO, who will not disclose that you have had a talk. If the whistleblowing procedure is not the most appropriate procedure, then your report can be redirected where appropriate to the correct channel, such as HR, Audit Investigations and so on.
- > If you opt to make a report by e-mail, then you can send your message directly to the Compliance Officer or AMLCO. Otherwise you can use the specific e-mail address of whistleblowing@belfius.be, which is monitored with total confidentiality.
- > Other forms of reporting are also possible, but offer less guarantee of confidentiality

How do you contact the chairman of the Management Board of Belfius Bank?

By telephone or by e-mail. Remember that the chairman's e-mail address can also be viewed by the General Secretary.

Further process of the procedure

Drafting documents

- > If the report can be accepted for the whistleblowing procedure, the Compliance Officer or AMLCO will draw up two separate documents:
 - a report form, which does not state the identity of the person making the report or of the person about whom the report is being made. The contents of this form must be as close as possible to the facts leading to the report.
 - an identification document that corresponds with the report form, but unlike that form, states the identity of the person making the report and the person about whom the report is being made. This document remains confidential with the Compliance Officer or the AMLCO.

Processing the report

- > After the Compliance Officer, or for AML-related reports, the AMLCO, has received the report, he or she will analyse the contents about the concern so that the appropriate method of follow-up can be put in motion.
- > In the context of making this assessment, the Compliance Officer or AMLCO and any person designated by them may consult the General Secretary and the General Auditor, for example if protective measures need to be taken because the facts to which the information received relate may jeopardise the interests of Belfius.
- > After this initial analysis, the Compliance Officer or AMLCO will begin an internal investigation, where appropriate in consultation with the designated internal departments, such as Legal or Audit.
- > The Compliance Officer or the AMLCO will decide, where appropriate in consultation with the designated departments, which matters need to be investigated based on the circumstances and the specific areas of the business involved.

Following the report

Information to and decision by management

- > While the report is being dealt with, the Compliance Officer or the AMLCO will update the chairman of the Management Board on a regular basis. In any event, the chairman is the person with final responsibility in all matters, AML included.
- > After the Compliance Officer or the AMLCO has formulated his or her recommendations, where appropriate in consultation with other designated departments, it remains the responsibility of management to take action based on these recommendations. The matter will be concluded by the Compliance department and all details relating to the report will then be archived in accordance with statutory and regulatory provisions.

- > The information and reports make no mention of the identity of the individuals involved (person making the report, person to whom the report relates, any witnesses), either directly or indirectly.

Information to the person making the report

- > The person making the report will receive by e-mail from the Compliance Officer or AMLCO confirmation of receipt of the report that was sustained.
- > The person making the report will be kept informed of the follow-up given to his or her report. He or she will also be kept informed about the internal investigation. This will be at the time the Compliance Officer or AMLCO deems appropriate.

Information to the person to whom the report relates

- > The person to whom the report relates, except where an AML-related offence is involved, will be notified of the fact that an investigation has been initiated at the request of the Compliance Officer or the AMLCO, and that in the context of that investigation, the personal data of that person will also be processed. However, the disclosure of information can be postponed until the necessary evidence of an incriminating or exculpatory nature has been gathered and retained. In the event of an obviously unjust report, it is possible, on an exceptional basis, that the person to whom the report relates is not notified.
- > The person to whom the report relates is able to access all of the information pertaining to him or her personally, albeit with the exception of details relating to the identity of the person making the report and any witnesses. With regard to the processing of the personal data of the person to whom the report relates, this person may always make use of the rights accruing to him or her under the GDPR regulations.

5. Reporting directly to the FSMA

This policy document only discusses the internal procedure implemented by Belfius within the statutory and regulatory context. If employees are of the opinion that making a report internally is not possible, not appropriate or opportune, they can also make a report directly to the FSMA.

More information about making a report directly to the FSMA can be found on www.fsma.be.

