

# Whistleblowing Procedure

<b>Issuer</b>	Compliance
<b>Issuer (Domain / Transversal team / OP / Region)</b>	PE - Professional Ethics
<b>Issuer team</b>	PE - Professional Ethics

<b>Functional domain</b>	Compliance - Regulatory Compliance		
<b>Processes involved</b>	Group Whistleblowing Procedure		
<b>Risk domain(s)</b>	Professional ethics (whistle-blowing)	Financial security (anti-bribery and corruption)	Financial security (embargoes & international financial sanctions)
<b>Key procedure</b>	Yes		
<b>Keywords</b>	Whistleblowing; Alert; Report		

<b>Level</b>	3
<b>Procedure type</b>	Procedure
<b>Scope</b>	
<b>Access rules</b>	Public access
<b>Owner/Author name(s)</b>	Mahesh Kutty Gujran
<b>Sponsor name(s)</b>	Joby John Meledan
<b>Validated by</b>	Christian Gueravetian

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<b>Higher level procedures</b>	DG0038EN – BNP Paribas Group Code of Conduct DG0018EN – Compliance Function Charter DG0020EN – BNP Paribas Internal Control Charter
<b>Related procedures</b>	CG0183EN – Global Anti-Corruption Policy
<b>Regulatory texts</b>	RBI/2006-2007/328 DO DBS. FrMC No. BC 5/ 23.02.011 /2006-07 dated April 18, 2007 RBI/2013-2014/565 FMD.MSRG.No.102/ 02.18.002/2013-14 dated April 16, 2014

## **EXECUTIVE SUMMARY**

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This implementation guide is a Level 3 procedure that supplements the Level 2 Group Whistleblowing Procedure (CPL0038). This guide presents the summary and the highlights of the Whistleblowing framework together with the information on the local whistleblowing referent and channels.

The staff should always refer to the Group procedure for proper implementation.

## WHAT'S NEW?

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**Due to recent regulatory development and as part of a process of continuous improvement, the Group Whistleblowing Procedure has been thoroughly reviewed.**

**To this end, the present procedure, last revised on 11/12/2018:**

**Strengthened protection of Whistleblowers in accordance with the provisions introduced by the Sapin 2 law in France which establishes the legal status of the Whistleblower**

- Confidentiality systematically applied.
- Mention of anonymous alerts.
- Formal commitment on confidentiality to be signed by any person involved in the process.

**Broaden scope of application, in terms of access to the Whistleblowing framework and types of subjects that may be reported**

- Persons entitled to use the Group's WB channels: expanded to external Employees.
- Types of violations: include HR related concerns, previously excluded at least in France.

**Increased formalization of responsibility and formalism**

- Formal nomination of a WB Referent for each channel.
- Detailed information on the reporting modalities.
- Description of recommended processing times.

**Additional specifications on the WB framework**

- Organization of the internal WB channels.
- Detailed provisions related to the sanctions and embargoes channel.
- Reference to external channels.

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## 1 Objectives

According to the Group Code of Conduct, Employees must report any suspected or observed breach of a law, a regulation or the Code of Conduct.

An Employee can use the whistleblowing framework presented in this instruction and procedure. It is a right and no Employee will be punished for not using it.

The implementation guide supplements the Level 2 Group Whistleblowing Procedure (CPL0038) to:

- Present the information on the local whistleblowing referent and channels.
- Meet local regulatory requirements that are not completely satisfied by the Group procedure (if any).

The Group Whistleblowing Procedure aims to expose the rules and modalities of the Whistleblowing framework, the whistleblowing channels it is made of and the protections it guarantees to a whistleblower, subject to certain conditions. This procedure is an integral part of the Global Anti-Corruption Policy (CG0183EN) in accordance with French law, the fight against corruption and the modernization of the economy of 2016 (known as the “Sapin II” Law).

## 2 Scope

The implementation guide is applicable to all staff of Sharekhan Limited and Group Entities, regardless of their business sector, including non-consolidated controlled companies.

The following issues are some of the examples that can be reported through the whistleblowing channels:

- Acts of corruption and influence peddling or any other infringement pertaining to probity.
- Acts of fraud.
- Inappropriate professional behavior or lack of respect for persons, diversity, and equal opportunity (e.g. inappropriate statements and acts, discrimination, harassment).
- Infringement of the rules of professional ethics (e.g. conflict of interest in private activities).
- Infringement of the rules of financial security (e.g. money laundering, terrorist financing, non-compliance with rules regarding sanctions and embargoes).
- Anti-competitive practices (e.g. abuse of dominant position).
- Breach of market integrity (e.g. market abuse).
- Infringement of the rules for the protection of interests of clients (e.g. charging commissions without informing the client, undue or excessive arbitration in an account under delegated management).
- Unauthorized communication of confidential information, theft or leakage of data.
- Violation of human rights and fundamental freedoms, damage to the health and safety of persons or to the environment noticed within activities performed by a Group’s Entity or within activities carried out by a subcontractor or a supplier within the framework of an established commercial relation with the Group or one of its Entities (e.g. if a sub-contractor is suspected of using under-aged workers).

Please refer to the Level 2 Group Whistleblowing Procedure for the complete details.

### 3 Protection

The whistleblowing framework guarantees the confidentiality of information collected through the whistleblowing channel. The elements enabling the whistleblower's identification cannot be disclosed without his/her consent, except to the legal authorities and to the persons in charge of handling the report (bound by the confidentiality charter). Moreover, no employee may be retaliated, disciplined, discharged or discriminated against, directly or indirectly, for an initiative that he/she takes in good faith and selflessly.

Please refer to the Level 2 Group Whistleblowing Procedure for the complete details.

### 4 Whistleblowing Referent and Contacts

Each whistleblowing channel is under the responsibility of a Whistleblowing Referent who is in charge of collecting and handling reports.

Staff can escalate issues and their concerns through the following channels:

- **Group Whistleblowing Channel:**

- An email sent to:  
[GLOBAL\\_COMPLIANCE\\_GROUP\\_ALERTE\\_ETHIQUE\\_WHISTLEBLOWING@bnpparibas.com](mailto:GLOBAL_COMPLIANCE_GROUP_ALERTE_ETHIQUE_WHISTLEBLOWING@bnpparibas.com)

The report made in the Group channel must be preferably in French or in English.

- **The “Sanctions and Embargoes” Channel:**

- Submitting a report on the website managed by an external service provider located in New York: <https://secure.ethicspoint.com/domain/media/en/gui/43721/index.html>
- Direct telephone call to the external service provider, whose contact information is posted on the above website.
- Electronic and telephone reports may be done on these platforms in the official languages of the countries in which the Group operates.
- Telephone call to one of the “Sanctions and Embargoes” Referents whose numbers are posted on the Group “Whistleblowing” Echonet page: <https://echonet.bnpparibas/pages/5ddbdee47135fc36152b47a2>  
You may report a suspected sanctions violation to the following contact, as an alternative:
  - the Head of GFS US – contact number: +1 212-814-3265 or
  - the Head of GFS Paris – contact number: +33 (0) 1 55 77 64 38

- **Regional Channel:**

- By telephone: +852 3197 3003
- By email: [apac\\_whistleblowing@asia.bnpparibas.com](mailto:apac_whistleblowing@asia.bnpparibas.com)
- By mail: Attention to APAC Whistleblowing Team; Address: 8/F, Lincoln House, Taikoo Place, 979 King's Road, Quarry Bay, Hong Kong

- **Local Channel:**

- By telephone: 022 6104 2916
- By email: [whistleblowing@sharekhan.com](mailto:whistleblowing@sharekhan.com)
- By mail / in person:

Mr. Joby John Meledan Mr. Mahesh Kutty Gujaraan	Sharekhan Limited, 10 <sup>th</sup> Floor, BETA, Lodha iThink Techno Campus, Off JVLR, Opp. Kanjurmarg Railway Station, Kanjurmarg (East), Mumbai – 400 042.
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- \* The whistleblower shall provide information while reporting:  
All facts, information or documents in his / her possession, regardless of their form or medium and to support his / her report  
Contact information for corresponding with the Whistleblowing referent.
- \* Under exceptional circumstances when the telephone is not answered during the first instance, the phone line will be directed to an automated answering service where the whistleblower can leave his / her message. The phone line will be recorded and the whistleblowing referent will check the messages regularly.

## 5 Handling of Whistleblowing Reports and other Details

For Steps for handling a whistleblowing report (Please refer to the level 2 Group Whistleblowing Procedure (the link is provided in the appendix area).

## 6 Appendices

### 6.1 **Level 2 Group Whistleblowing Procedure (CPL0038)**