

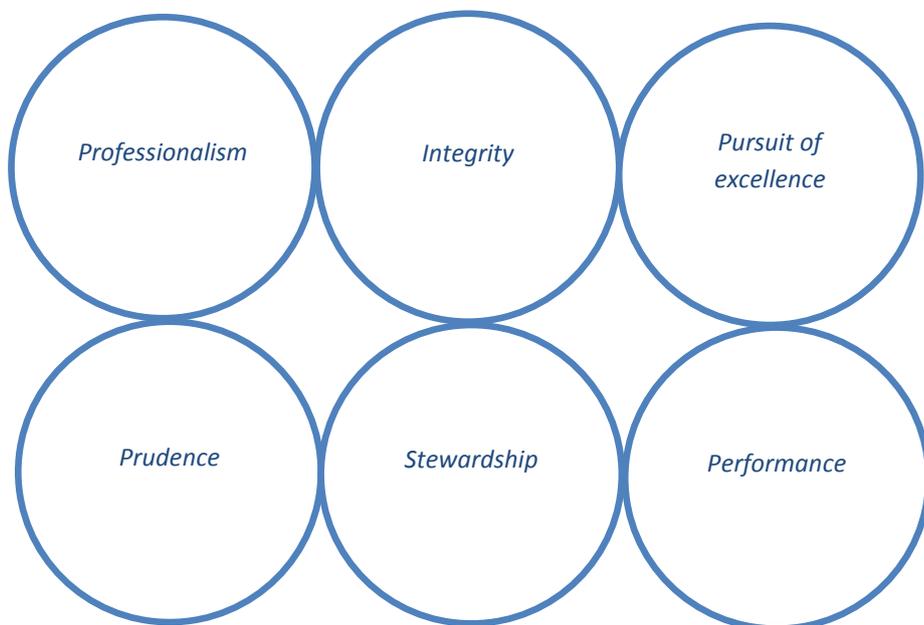


Code of Conduct

INTRODUCTION

This Code of Conduct aims at presenting to BLOM BANK FRANCE's employees, partners and customers the requirements the Bank sets as the principles ruling its commercial relationships and the conduct of its employees within the group. BLOM BANK FRANCE has always set the compliance with the regulation as a primary objective. Its ethical principles are therefore well above the legal standards.

**BLOM Bank France actions are lead by the same values
as its parent BLOM BANK SAL :**



Five pillars of customers' relationship

1. The customer interest

The customer interest is the ruling principle for all our employees' actions. This interest is taken into account, while complying with the regulatory framework, before any personal interest or even the bank interest.

2. A customized treatment

Each employee involved with a customer has to provide him with adapted information to his financial markets and banking system knowledge. Employees also adapt their advices according to the financial situation of the customer.

3. A clear and adequate information

As a primary objective, the bank provides its customers with information allowing for a full understanding of the operations on their accounts.

4. A fair treatment

The BLOM BANK FRANCE group is fully committed to treat on a fair basis all its customers according to the different services offered.

5. A narrow privacy policy

All information concerning the customers' information or their banking situation is protected by an IT system provided for that purpose but also by the obligation for all collaborators to comply with banking secrecy requirements within the limits provided by the law.

Five pillars of among collaborators' relationships

1. A sound working environment

Cooperating with all partners, BLOM BANK FRANCE group aims providing all its collaborators with a sound and safe working place. This environment gives all the collaborators the resources, tools and framework needed for their missions' fulfillment.

2. Deterring harassment at workplace

BLOM BANK FRANCE pays a special attention to harassment at work place (physical, moral or sexual). It is one of the ways to ensure the well-being of its employees and the serenity of their working environment.

3. Appropriate use of the assets

BLOM BANK FRANCE group makes sure that the collaborators use properly the assets made available by the bank in order to safeguard the customers and the bank converging interests. Different levels of control have been set up in order to ensure the appropriate use of these assets.

4. A professional behavior and a mutual respect

BLOM BANK FRANCE collaborators should adopt a professional and cordial attitude in order to maintain a pleasant working environment.

5. Privacy observance

The BLOM BANK FRANCE collaborators respect the private life of their colleagues (no private information is recorded or retained within the bank) and apply the same rule to the customers within the legal guidelines governing banking secrecy.

Five measures

1. Conflict of interest management

BLOM BANK FRANCE set up a conflict of interest policy. These requirements deal with gifts, advantages but also with outside professional activities of the group collaborators. These rules aim at ensuring the collaborators objectivity during their daily tasks.

2. Providence of a reliable information

The internal control of the information provided by BLOM BANK FRANCE (notably concerning accounting and risk) allows identifying the major challenges the Bank is facing to, reporting them to its partners and to provide the most suitable answer.

3. Fight against money-laundering and terrorism financing

The « Anti-money laundering and terrorism financing » procedures ensure that the Bank's services are not used for criminal purposes. It reduces the Bank's exposure towards sanctions or reputational risk and allows for an active collaboration with the authorities.

4. Whistleblowing

BLOM BANK FRANCE implemented a whistleblowing procedure which gives to each collaborator the possibility to inform an impartial person in case of internal fraud, external fraud or failure of an employee to fulfill his/her professional duties.

5. Customers complaints management

The BLOM BANK FRANCE customers have access to several ways to transmit a claim. It guarantees the efficiency and neutrality of the claim's treatment while optimizing their follow-up and allowing for procedures' improvement in order to better serve the customers.