



Applicable principles

The whistleblowing right must be exercised in good faith and in a responsible, disinterested, non-defamatory and non-abusive manner.

Potential breaches eligible to be reported include unlawful acts or omissions, whether presumed or actual, which are of a certain severity and which are related to Spuerkeess' activities:

- Breaches of a legislative or regulatory provision, with particular attention to facts likely to be qualified as criminal;
- "Human rights" violations, particularly covering working conditions and the fight against all forms of discrimination;
- Infringement of the Rules of Conduct and Business Ethics, particularly those contained in the Spuerkeess Staff Code of Conduct.

Whistleblowing is reserved for:

- Spuerkeess employees or former employees;
- Occasional employees on assignment at Spuerkeess;
- Service providers with whom a commercial relationship is maintained (subcontractors, suppliers);
- "Third parties" who witness violations or serious infringements attributable to Spuerkeess employees or persons acting on behalf of the Bank.

Spuerkeess protects whistleblowers, including from retaliation or sanctions and guarantees strict confidentiality of their identity:

- The whistleblower benefits from the protection provided by law against any form of reprisals;
- The alert is strictly confidential and the identity of the whistleblower will not be disclosed without their express consent.

Practical arrangements

This form is provided to make the process easier for the whistleblower and to guarantee effective processing of their alert.

The form should be sent:

- By email to whistleblowing@spuerkeess.lu, marked “strictly confidential” in the subject line, or;
- By post to Spuerkeess, marked “strictly confidential”, for the attention of the Chief Compliance Officer, 1 Place de Metz, L-1930 Luxembourg.

The whistleblower is informed of the status of the alert via:

- An acknowledgement of receipt sent within seven days of the date of receipt of the alert;
- Feedback provided at the end of the investigation, and at the latest within three months following the acknowledgement of receipt of the alert.

It should be noted that this Whistleblowing Form does not apply to “Complaints” received from customers¹, the processing and resolution of which is governed by a specific procedure.

¹ Complaint lodged with Spuerkeess seeking recognition of a right or redress for damage, in the context of a dispute relating to a financial product, a financial service or to the statutory audit of accounts (see CSSF Regulation 1607).

Form to be completed by the whistleblower

Your link to Spuerkeess:

.....

Your contact details:

Last name and first name:
Email:.....
Telephone:.....

Date and place of occurrence of the reported events:

.....

Identity of the perpetrator of the reported acts:

.....

Were you present at the time of the offence?

 Yes No

Have you already informed a third party?

Yes

No

If YES, please specify who has been notified within Spuerkeess or outside the bank:

.....
.....
.....

Are you afraid of reprisals?

Yes

No

If YES, please describe this risk and indicate whether it has already occurred:

.....
.....
.....

Do you authorise the Chief Compliance Officer to contact you in connection with processing of the alert?

Yes

No