



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 related to the activities of Spuerkeess:

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

The reporting of an alert is reserved for:

- Spuerkeess employees or former employees;
- Occasional employees on assignment at Spuerkeess;
- Service providers with a current commercial relationship (subcontractors, suppliers);
- “Third parties” witnessing violations or serious infringements due to Spuerkeess employees or persons acting on behalf of the Bank.

Spuerkeess protects whistleblowers against possible reprisals or sanctions and guarantees to keep their identity strictly confidential:

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

Practical arrangements

This form is provided for an easier reporting of alerts and to guarantee effective processing of alerts.

The form shall 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.

Please note that this Whistleblowing Form does not apply to “customer complaints”¹ whose processing and resolution are 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 16-07).

Form to be completed by the whistleblower

Your interaction with Spuerkeess:

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Your contact details:

Last name and first name:
Email:
Telephone:

Date and place of occurrence of the reported events:

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Identity of the perpetrator(s) of the reported events:

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Were you present when the breach occurred?

 Yes No

Have you already informed a third party?

 Yes No

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

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Are you afraid of reprisals?

 Yes No

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

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

 Yes No