

STATEMENT ON TACKLING MODERN SLAVERY AND HUMAN TRAFFICKING

This statement is published in accordance with section 54 of the UK Modern Slavery Act 2015, which addresses the issues of modern slavery and human trafficking.

It describes the steps taken by Crédit Agricole Corporate and Investment Bank (Crédit Agricole CIB) for the financial year ended December 31st, 2021 to tackle all forms of modern slavery and human trafficking in its business activities and relationships and supplier relationships.

This declaration was approved by Crédit Agricole CIB's Board of Directors on May 3rd 2022.

CREDIT AGRICOLE CIB, CORPORATE AND INVESTMENT BANK OF CREDIT AGRICOLE GROUP

Crédit Agricole Group has banking and insurance activities in 47 countries, 53 million clients across the world, 11,2 million members and 7,3% of individual shareholders. The Group Crédit Agricole S.A has 147 000 employees in France and abroad. Our compliance with social and environmental commitments is an integral part of the investment and business transformation projects of our clients, which include multi-national groups, SMEs, farmers, craftsmen, associations, communities and consumers.

Crédit Agricole CIB, subsidiary of Crédit Agricole SA, is the corporate and investment bank of Crédit Agricole Group, serving 2 138 corporate customers and 1 583 financial institutions.

Crédit Agricole CIB offers its clients a wide range of products and services in capital markets and investment and corporate banking. Crédit Agricole CIB provides support to its clients in key international markets through its global network in 30 countries, including major countries in Europe, Americas, Asia-Pacific and the Middle-East.

In the course of their activities, Crédit Agricole Group and Crédit Agricole CIB purchase products and services from suppliers, who themselves may use subcontractors. In 2021, Crédit Agricole SA Group's amount purchases totaled €6.3 billion, and the main purchasing and service contracts concerned the following categories: real estate, IT, intellectual services, general goods, and communication.

OUR COMMITMENTS

On the strength of its cooperative and mutualist identity and its longstanding commitments, in 2019 Crédit Agricole Group defined its *Raison d'être* as "Acting every day in the interest of our customers and society". It is on this basis, with the desire to anchor its usefulness to society in all its activities, business lines and processes, that the Group has developed its new strategic plan, "*Ambitions 2022*", that will guide our actions by means of three flagship projects: the customer project, the human project and the societal project. Thus, Crédit Agricole CIB is part of the Group's project.

It reflects our desire to root our strategy and our commitments in the fundamental principles we adhere to, which are:

- The United Nations' Universal Declaration of Human Rights, of 1948,
- The ten principles of the UN Global Compact, since 2003,
- The Equator Principles, since 2003,
- The United Nations Sustainable Development Goals, since 2015,
- The UN Guiding Principles on Business and Human Rights approved by the Human Rights Council, 2011,
- The OECD Guidelines for Multinational Enterprises,
- The International Labor Organization conventions and the performance standards of *Société Financière Internationale* (SFI),
- The Principles of Responsible Banking (PRB), since 2019.

OUR POLICIES

These commitments are set out in the following policies formalizing the principles of professional, social and environmental ethics to be observed throughout our Group, including in respect of human rights:

- The **CSR sector financing policies**, which set forth the social and environmental criteria that apply to lending and investment activities and which include respect for human rights. For each sector covered, a reference framework is defined and analysis of transactions as well as exclusion criteria delimiting the projects and the operations the Group does not want to support.

- The **Diversity Charter** since 2008 has underpinned the Crédit Agricole Group's efforts to promote diversity in the workplace and prevent all forms of discrimination.
- **The Crédit Agricole S.A group agreement related to the employment of people with disabilities.** Since 2005, the Crédit Agricole S.A group as pursues a proactive policy in favor of equal rights and opportunities and places the inclusion of people with disabilities at the heart of the group's social responsibility. This commitment, strongly anchored in the principles of ethical behavior, respect for people and accountability, now features in the ambitions of the human pillar of the Group Project 2020-2022 presented in June 2019.
- The **International Framework Agreement** on fundamental human rights and trade union rights signed between Crédit Agricole S.A and UNI Global Union, the global union federation for the private services sector, in July 2019.
- The **Responsible Purchasing Policy** and the **Responsible Purchasing Charter** revised in 2017 and extended to the entire Crédit Agricole Group in 2018, which is based on reciprocal commitments between Crédit Agricole SA Group entities and their suppliers based on the fundamental principles of the United Nations Global Compact.

For this, on April 16th 2021, Crédit Agricole S.A. and its subsidiaries, including Crédit Agricole CIB, obtained the renewal of the Supplier Relations and Responsible Purchasing label, which rewards companies that provided proof of lasting and balanced relationships with their suppliers. This is issued for a three years period by the Business Mediator (Ministry of Economy) and the National Purchasing Council (CNA) on the basis of an assessment and a documentary audit carried out by an approved firm (ASEA).

This Label confirms the Bank's commitment to a responsible purchasing policy and, more generally, its desire to improve its CSR performance and its societal impact, and to reduce its environmental footprint.

- The **Crédit Agricole Group's Ethics Charter**, which was first issued in May 2017, and which sets out the Group's guidelines for action and behavior in line with the applicable international agreements and conventions on human rights, the prevention of forced labor and child labor, and the fight against bribery and corruption.
- The **Code of conduct** and the **Anti-corruption code of conduct**, which each Crédit Agricole S.A Group entity must prepare to implement the principles of the Group's Ethics Charter on the one hand, and to comply with the terms of the Sapin 2 Law on the other hand. These Crédit Agricole CIB's Codes of Conduct were disseminated in January 2019, updated in September 2019 and as such released on October 1st, 2019.

All of these documents are available via the links below:

<https://www.credit-agricole.com/en/group/ethique-et-conformite/culture-compliance-and-ethics>

<https://www.ca-cib.com/about-us/compliance>

MANAGEMENT OF MODERN SLAVERY AND HUMAN TRAFFICKING RISK

Our policies are accompanied by action plans and operating processes which contribute to the management of risks relating to modern slavery and human trafficking in our activities and our relations with suppliers. These risks are assessed on the basis of a differentiated approach depending on the parties and activities concerned.

For Crédit Agricole CIB, prevention of these risks is based on relations with its employees and on relations with suppliers and subcontractors.

For each of these scopes, the framework for managing these risks consists of policies and action plans that include identification, assessment and risk attenuation phases. The level of deployment of these action plans is assessed in order to ensure their effectiveness and contribute to the ongoing improvement of prevention of these risks.

- **In relations with Crédit Agricole CIB employees**

As part of the enhanced social pact that forms part of the Group's Human Project, on 31 July 2019 Crédit Agricole SA signed an International Framework Agreement with the global union federation for the private services sector, UNI Global Union. This worldwide agreement covers human rights, basic labor rights and development of dialogue with employee representatives. It builds on the Crédit Agricole SA's commitments and its subsidiaries including Crédit Agricole CIB by proposing the same social standards for all their employees, regardless of where they work, and helping to improve working conditions. This agreement offers a frame of reference for Crédit Agricole SA's 75 000 employees in the 47 countries in which it operates.

To guarantee that the human rights of all our employees are observed, we ensure that all our internal HR procedures are consistent with the commitments and policies taken by Crédit Agricole S.A at the Group level, as referred to above. Crédit Agricole CIB ensures in particular that it offers a working environment that protects the health of its employees, plays an active role in the social

protection of all its employees (particularly in terms of matters relating to health, retirement, death, incapacity and disability) and takes care to protect the safety of its employees.

As a signatory of the Diversity Charter, Crédit Agricole CIB has been committed for a number of years to an approach aiming to promote diversity and balance based on principles of non-discrimination and diversity with respect to background and age. This mostly involves signing agreements on themes such as non-discrimination in hiring, training, promotion and compensation, and ensuring an even work-life balance.

Crédit Agricole CIB, through its resources representatives and the Human Resources Division of Crédit Agricole SA, maintains dialogue with all those involved in labor relations. This dialogue is structured on a number of levels to take account of the Crédit Agricole Group's extensive presence in Europe. A total of 14 countries (accounting for over 90 % of Crédit agricole employees) are represented within the European Works Council, which meets yearly. In France, employee representatives and senior management meet within the Group committee to discuss strategy and the Group's economic and social situation. Within Crédit Agricole SA, two other bodies maintain dialogue with employee representatives: a Cooperation Committee, within which executive managers can put forward their projects and initiate debate with employee representatives, and meetings of trade union representatives organized monthly to fuel debate, engage in close dialogue and explain any strategic developments in the Group's business lines.

Furthermore, the Group's Ethics Charter and Code of conduct of Crédit Agricole CIB specify the behavior that is expected for all employees. Thus, the Code of conduct of Crédit Agricole CIB reminds employees that they must strictly observe the rules concerning the responsibility and integrity, the mutual respect, the knowledge and adherence to the rules, both in their relationships with other employees and with other stakeholders. The implementation of these rules is based on a corpus of procedures in the area of compliance (Corpus Fides), which is disseminated and regularly updated. This includes processes for managing non-compliance risk and a specific procedure for reporting non-compliance.

On the operational level, 2020 was marked on the one hand by the deployment of the Group agreements signed in 2019 and in 2021 through a reinforced social dialogue at both Group and Crédit Agricole CIB level, in keeping with the health crisis related to the Covid-19 pandemic.

In relations with Crédit Agricole CIB suppliers and subcontractors

To detect and prevent the risks of modern slavery and human trafficking within or in connection with our supply chain, we have implemented procedures to:

- Identify and assess the most risk-exposed sectors of its supply chain;
- Monitor these risky sectors in our supply chain;
- Prevent the risks of modern slavery practices within our processes.

The Crédit Agricole Group's Responsible Purchasing Policy, which includes prevention of risks of practices relating to modern slavery and human trafficking, has been signed by the Chief Executive Officer of Crédit Agricole CIB, who is thus committed to complying it within the Company. This policy applies to employees who are involved in the purchasing process and to suppliers. The rules that apply to purchasing are also explained in a procedural memo that applies to all employees.

In addition, a "Purchase Responsibility" e-learning module, updated in 2019, has been made available to the Crédit Agricole CIB's purchasing staff, to inform them of the various risks involved and the company's procedures and policies. This e-learning program can also be accessed by all Crédit Agricole CIB's employees so that all potentially concerned employees understand and are able to implement the Group's responsible purchasing policy.

Our suppliers' agreement to observe our values is formally expressed in the Responsible Purchasing Charter, which they must sign before responding to a request for proposals or signing a supplier contract. This charter sets forth the reciprocal commitments of the Crédit Agricole CIB and its suppliers, which are based on the fundamental principles of the UN Global Compact. Furthermore, all contract templates include a specific clause on "Respect for human rights, protection of the environment and the prevention of corruption", by which suppliers represent and warrant that they ensure compliance within their supply chains with all of their obligations in respect of the identification of risks and the prevention of serious breaches of human rights and fundamental liberties, or of serious harm to the health or safety of people or to the environment which may result from their activities, in accordance with the laws and/or regulations in the areas of human, social and environmental rights. For the United Kingdom, this clause refers expressly to the Act of March 26th, 2015 on the prevention of all forms of modern slavery and human trafficking (MSA).

The analysis of CSR purchasing risks is based on three complementary approaches, which include an assessment of the risk that is specific to each purchases category, an analysis of the supplier risk, and an analysis of the geographic risk, which may negatively impact the overall rating. In 2017, the Group Purchasing Department worked with three leading banking groups and the French standards body AFNOR to remap the intrinsic CSR risks related to the purchases in the banking sector.

Since 2018, the Group Purchasing Department has completed updates to its risk map by identifying, analysing and prioritising purchasing categories that pose risks based on environmental, social, human rights, and ethical criteria. In the initial phase of this mapping process, an analysis of the overall risk enables the identification of three purchasing categories that are considered to

be 'high risk' or 'very high risk' and which were targeted as priorities for action plans to reduce purchasing risk. These are the 'real estate works', 'IT equipment and servers' and 'advertising material' purchasing categories, for which progress plans devised with our suppliers and specifiers have been implemented.

For purchasing categories that require supplier approval by the Crédit Agricole SA group, the CSR supplier assessment form, which includes criteria relating to respect of human rights, is now systematically attached to all requests for proposals. This takes account of both the supplier's CSR policies and CSR criteria to assess the proposal. Since 2012, the assessment of suppliers' CSR policies has been entrusted to EcoVadis, an independent company. The CSR quality of the supplier's product or service is assessed by including technical and specific criteria in the specifications determined on the basis of risk mapping. The score obtained based on CSR criteria is fully incorporated into decisions on selecting a given good or service when assigning a contract to a supplier. Since 1 January 2020, this CSR score has accounted for 15% of the overall rating.

The Group Purchasing Department has also enhanced its procedures for assessing supplier risk and supplier compliance. The Know Your Supplier (KYS) procedure for scoring, screening and identifying suppliers has been reinforced. In the case of suppliers with the highest level of risk, screening for adverse news (on respect for human rights, for instance) is now carried out more frequently (weekly). The results of these analyses are presented to the Group Supplier Risk Committee, which was set up in early 2020 for the purposes of deciding whether to continue – or discontinue – relations with a supplier

Lastly, since 2018 Crédit Agricole SA has provided funding to Human Resources Without Borders, an international NGO that promotes human rights at work. Human Resources Without Borders provides its contributors with forced labor and child labor risk maps for each geographic region, which are an additional source of information we use to update our purchasing risk map. Crédit Agricole CIB, as part of Crédit Agricole S.A Group respects the Group's commitments.

WARNING PROCEDURE

In order to enhance risk prevention, a centralized system for reporting alerts is open not only to Group employees but also to third parties to enable them to report any shortcomings with regard to Group ethics, policies or procedures. To make it easier to report alerts relating, among other areas, to human rights, health and safety or the environment, this can now be done via a digital warning reporting and processing tool that can be accessed via a link available on our website <https://www.bkms-system.com/bkwebanon/report/clientInfo?cin=3CAgr18&c=-1&language=eng>, and on the intranet for the employees. The confidentiality of the identity of persons reporting alerts (with the possibility of speaking on condition of anonymity) is ensured if an alert is made in accordance with regulations.

This alert processing tool was rolled out widely across Crédit Agricole CIB. It is now available in 11 languages (French, English, German, Spanish, Italian, Dutch, Portuguese, Polish, Ukrainian, Romanian and Serbian). The whistleblower can report the alert in the language of his choice. It makes it easier to carry out quantitative and qualitative analyses of alerts (number and type of alerts), and these analyses are then used to assess non-compliance risks and to update the preventive measures in place.

CONTINUOUS IMPROVEMENT

Measures for preventing risks of breaches of human rights include both obligations arising from international rules and recommendations and those of national law.

Therefore, all efforts to prevent these risks are developed in accordance with the measures of the 'Sapin 2 Act' of 9 December 2016 on the Transparency, the Prevention of Corruption and the Modernization of the Economy, and the Vigilance Plan of Crédit Agricole SA group established within the framework of the French law of 27 March 2017 relating to the duty of care of parent companies and contracting companies.

Each year, Crédit Agricole CIB publishes the details of its environmental, social and governance (ESG) risk management procedure in a dedicated chapter within the Universal Registration Document.

Crédit Agricole CIB's entire approach is part of a continuous improvement process, the main components of which are :

- Adapting non-financial risk identification and management tools by updating risk maps when necessary;
- Continuing with the deployment of targeted action plans to reduce the CSR risks of suppliers in the purchasing categories identified as 'high risk' and 'very high risk';
- Seeking to involve our suppliers in our efforts, by regularly informing them of our responsible purchasing commitments and strategy.

Montrouge, May 3rd 2022

Jacques Ripoll
Chief Executive Officer