CODE OF ETHICS

CRÉDIT AGRICOLE GROUP
This new code of ethics expresses Crédit Agricole Group’s commitment to behaviour that reflects all its values and principles of action vis-à-vis its customers, mutual shareholders, shareholders, as well as its suppliers and all stakeholders with whom it engages. It acts as a responsible employer.

It is the responsibility of Directors and executives to respect the values set out in this Code and to set an example. Executives must ensure that these values are applied and shared by all Crédit Agricole Group employees, regardless of their level of responsibility, business line or place of work.

Our Code of ethics, beyond merely applying all the legal, regulatory and industry rules governing our various businesses, reflects our desire to do even more to better serve our customers, who have been our raison d’être since day one.

All Directors and employees are made aware of our Code of ethics.

It is applied by each entity in a form that reflects its specific characteristics and incorporated into its internal control procedures.

The Compliance principles are compiled into a set of rules (Fides Corpus).

Our principles of action and behaviour comply with the fundamental principles found in the various international documents.1

---

1 These include the principles in the Universal Declaration of Human Rights published by the UN in 1948, the ten principles of the United National Global Compact, the OECD Guidelines for Multinational Enterprises, the OECD anti-corruption guidelines and recommendations, International Labour Organization conventions.
This new code of ethics expresses Crédit Agricole Group’s commitment to behaviour that reflects all its values and principles of action vis-à-vis its customers, mutual shareholders, shareholders, as well as its suppliers and all stakeholders with whom it engages. It acts as a responsible employer.

It is the responsibility of Directors and executives to respect the values set out in this Code and to set an example. Executives must ensure that these values are applied and shared by all Crédit Agricole Group employees, regardless of their level of responsibility, business line or place of work.

Our Code of ethics, beyond merely applying all the legal, regulatory and industry rules governing our various businesses, reflects our desire to do even more to better serve our customers, who have been our raison d’être since day one.

All Directors and employees are made aware of our Code of ethics. It is applied by each entity in a form that reflects its specific characteristics and incorporated into its internal control procedures.

The Compliance principles are compiled into a set of rules (Fides Corpus). Our principles of action and behaviour comply with the fundamental principles found in the various international documents.\(^{(1)}\)

\(^{(1)}\) These include the principles in the Universal Declaration of Human Rights published by the UN in 1948, the ten principles of the United National Global Compact, the OECD Guidelines for Multinational Enterprises, the OECD anti-corruption guidelines and recommendations, International Labour Organization conventions.
Thanks to its universal customer-focused retail banking model – based on the close cooperation between its retail banks and their related business lines –, Crédit Agricole Group aims to build a multi-channel relationship with its customers, streamlining and facilitating their plans in France and worldwide, helping them make optimal decisions, and supporting them over time with determination, flexibility and innovation.

To help its customers and meet their needs, Crédit Agricole Group provides them with a range of expertise and know-how: everyday banking, lending, savings, insurance, asset management, real estate, lease financing, factoring, corporate and investment banking, etc.

Crédit Agricole promotes the cooperative values of democratic governance, relationships of trust and respect for and between its members. It relies on each person's sense of responsibility and entrepreneurial spirit. Customer satisfaction, regional development and the search for long-term performance inform its actions.

Our long-standing values – CUSTOMER FOCUS, RESPONSIBILITY and SOLIDARITY – mean that people drive our actions and are central to our purpose.

Crédit Agricole Group is built around regional cooperative and mutual banks, with a European calling and open to the world.

Built on its sense of ethics and fairness and true to its cooperative culture, compliance helps enhance customer trust and the Group’s image. It is central to our business lines and to the governance of Crédit Agricole Group.

Crédit Agricole Group undertakes that its principles of action help further its goal of being the fair bank, open to everyone, multichannel, providing each person with support over time and with the ability to make fully informed decisions.
Thanks to its universal customer-focused retail banking model – based on the close cooperation between its retail banks and their related business lines – Crédit Agricole Group aims to build a multi-channel relationship with its customers, streamlining and facilitating their plans in France and worldwide, helping them make optimal decisions, and supporting them over time with determination, flexibility and innovation.

To help its customers and meet their needs, Crédit Agricole Group provides them with a range of expertise and know-how: everyday banking, lending, savings, insurance, asset management, real estate, lease financing, factoring, corporate and investment banking, etc.

Crédit Agricole promotes the cooperative values of democratic governance, relationships of trust and respect for and between its members. It relies on each person’s sense of responsibility and entrepreneurial spirit. Customer satisfaction, regional development and the search for long-term performance inform its actions.

Our long-standing values – **CUSTOMER FOCUS, RESPONSIBILITY and SOLIDARITY** – mean that people drive our actions and are central to our purpose.

Built on its sense of ethics and fairness and true to its cooperative culture, compliance helps enhance customer trust and the Group’s image. It is central to our business lines and to the governance of Crédit Agricole Group.

Crédit Agricole Group undertakes that its principles of action help further its goal of being the fair bank, open to everyone, multichannel, providing each person with support over time and with the ability to make fully informed decisions.
VIS-À-VIS SOCIETY
Fundamental rights
The Group operates worldwide in compliance with human rights and basic social rights.

Corporate Social Responsibility (CSR)
The Group reaffirms its corporate social and environmental responsibility approach across all its business lines and within corporate operations. This approach is built on a value-creating CSR strategy and is designed to support the regions, strive for excellence in our dealings with our customers, partners, mutual shareholders and employees.

VIS-À-VIS OUR EMPLOYEES
Responsible human resource policy
For the Group, being a responsible employer means ensuring non-discrimination, equal treatment, encouraging personal development, in particular through training actions, promoting gender equality, diversity of backgrounds and profiles and helping people with disabilities, encouraging social dialogue and quality of working life, and creating a safe work environment in which all employees are treated with dignity and respect.

Responsible behaviour
Every Director, executive, employee reflects the Group’s image. Responsible and ethical behaviour is required at all times and in all circumstances: no action is permitted that may harm the reputation and integrity of the Group’s image.

Confidentiality and integrity of information
Group Directors, executives and employees are subject to the same duty of secrecy and are forbidden from improperly disseminating or using, for their own account or on behalf of third parties, any confidential information they may have. Employees must endeavour to provide reliable and accurate information to our customers, shareholders, supervisory authorities, the financial community and stakeholders in general.

Prevention of conflicts of interests
Group Directors, executives and employees must be free of all conflicts of interests in order to, at all times, ensure that the interests of our customers take precedence.

Vigilance
Everyone, Directors, executives and employees, must work to safeguard the interests of customers, combat money laundering and terrorist financing, comply with international sanctions, combat corruption, prevent fraud and safeguard market integrity. Each person must ensure an appropriate level of vigilance given the Group’s business lines and, if necessary, use the alert mechanism, in line with current regulations and procedures.

VIS-À-VIS OUR CUSTOMERS
Respect and support for customers, and fairness towards them
Each employee brings his/her experience and expertise to bear in listening to and serving customers and mutual shareholders and in supporting them over time, all in a multi-channel environment. They listen and provide customers with fair advice, help customers make decisions by offering solutions that are tailored to their profile and interests while informing them of the related risks.

Solidarity
Built on the Group’s mutual base, the relationships we establish with our customers, mutual shareholders and all our stakeholders embody solidarity, the fulfilment of all commitments made.

Usefulness and convenience
Our Group is committed to its universal customer-focused bank model, a fount of values and beneficial for our customers, who get access to the expertise and know-how of all the Group’s business lines. It remains true to its local commitment by spurring regional development.

Protection of personal data and transparency in their use
The Group has established a standard framework by means of a personal data code to ensure our customers’ data is protected.

They apply:

VIS-À-VIS OUR CUSTOMERS
Respect and support for customers, and fairness towards them

Each employee brings his/her experience and expertise to bear in listening to and serving customers and mutual shareholders and in supporting them over time, all in a multi-channel environment. They listen and provide customers with fair advice, help customers make decisions by offering solutions that are tailored to their profile and interests while informing them of the related risks.

Solidarity
Built on the Group’s mutual base, the relationships we establish with our customers, mutual shareholders and all our stakeholders embody solidarity, the fulfilment of all commitments made.

Usefulness and convenience
Our Group is committed to its universal customer-focused bank model, a fount of values and beneficial for our customers, who get access to the expertise and know-how of all the Group’s business lines. It remains true to its local commitment by spurring regional development.

Protection of personal data and transparency in their use
The Group has established a standard framework by means of a personal data code to ensure our customers’ data is protected.

VIS-À-VIS OUR EMPLOYEES
Responsible human resource policy
For the Group, being a responsible employer means ensuring non-discrimination, equal treatment, encouraging personal development, in particular through training actions, promoting gender equality, diversity of backgrounds and profiles and helping people with disabilities, encouraging social dialogue and quality of working life, and creating a safe work environment in which all employees are treated with dignity and respect.

Responsible behaviour
Every Director, executive, employee reflects the Group’s image. Responsible and ethical behaviour is required at all times and in all circumstances: no action is permitted that may harm the reputation and integrity of the Group’s image.

Confidentiality and integrity of information
Group Directors, executives and employees are subject to the same duty of secrecy and are forbidden from improperly disseminating or using, for their own account or on behalf of third parties, any confidential information they may have. Employees must endeavour to provide reliable and accurate information to our customers, shareholders, supervisory authorities, the financial community and stakeholders in general.

Prevention of conflicts of interests
Group Directors, executives and employees must be free of all conflicts of interests in order to, at all times, ensure that the interests of our customers take precedence.

Vigilance
Everyone, Directors, executives and employees, must work to safeguard the interests of customers, combat money laundering and terrorist financing, comply with international sanctions, combat corruption, prevent fraud and safeguard market integrity. Each person must ensure an appropriate level of vigilance given the Group’s business lines and, if necessary, use the alert mechanism, in line with current regulations and procedures.

OUR PRINCIPLES OF ACTION

They apply:

VIS-À-VIS OUR CUSTOMERS
Respect and support for customers, and fairness towards them

Each employee brings his/her experience and expertise to bear in listening to and serving customers and mutual shareholders and in supporting them over time, all in a multi-channel environment. They listen and provide customers with fair advice, help customers make decisions by offering solutions that are tailored to their profile and interests while informing them of the related risks.

Solidarity
Built on the Group’s mutual base, the relationships we establish with our customers, mutual shareholders and all our stakeholders embody solidarity, the fulfilment of all commitments made.

Usefulness and convenience
Our Group is committed to its universal customer-focused bank model, a fount of values and beneficial for our customers, who get access to the expertise and know-how of all the Group’s business lines. It remains true to its local commitment by spurring regional development.

Protection of personal data and transparency in their use
The Group has established a standard framework by means of a personal data code to ensure our customers’ data is protected.

VIS-À-VIS OUR EMPLOYEES
Responsible human resource policy
For the Group, being a responsible employer means ensuring non-discrimination, equal treatment, encouraging personal development, in particular through training actions, promoting gender equality, diversity of backgrounds and profiles and helping people with disabilities, encouraging social dialogue and quality of working life, and creating a safe work environment in which all employees are treated with dignity and respect.

Responsible behaviour
Every Director, executive, employee reflects the Group’s image. Responsible and ethical behaviour is required at all times and in all circumstances: no action is permitted that may harm the reputation and integrity of the Group’s image.

Confidentiality and integrity of information
Group Directors, executives and employees are subject to the same duty of secrecy and are forbidden from improperly disseminating or using, for their own account or on behalf of third parties, any confidential information they may have. Employees must endeavour to provide reliable and accurate information to our customers, shareholders, supervisory authorities, the financial community and stakeholders in general.

Prevention of conflicts of interests
Group Directors, executives and employees must be free of all conflicts of interests in order to, at all times, ensure that the interests of our customers take precedence.

Vigilance
Everyone, Directors, executives and employees, must work to safeguard the interests of customers, combat money laundering and terrorist financing, comply with international sanctions, combat corruption, prevent fraud and safeguard market integrity. Each person must ensure an appropriate level of vigilance given the Group’s business lines and, if necessary, use the alert mechanism, in line with current regulations and procedures.
Our Principles of Action

They apply:

**VIS-À-VIS OUR CUSTOMERS**
Respect and support for customers, and fairness towards them
Each employee brings his/her experience and expertise to bear in listening to and serving customers and mutual shareholders and in supporting them over time, all in a multi-channel environment. They listen and provide customers with fair advice, help customers make decisions by offering solutions that are tailored to their profile and interests while informing them of the related risks.

Solidarity
Built on the Group’s mutual base, the relationships we establish with our customers, mutual shareholders and all our stakeholders embody solidarity, the fulfilment of all commitments made.

Usefulness and convenience
Our Group is committed to its universal customer-focused bank model, a fount of values and beneficial for our customers, who get access to the expertise and know-how of all the Group’s business lines. It remains true to its local commitment by spurring regional development.

Protection of personal data and transparency in their use
The Group has established a standard framework by means of a personal data code to ensure our customers’ data is protected.

**VIS-À-VIS SOCIETY**
Fundamental rights
The Group operates worldwide in compliance with human rights and basic social rights.

Corporate Social Responsibility (CSR)
The Group reaffirms its corporate social and environmental responsibility approach across all its business lines and within corporate operations. This approach is built on a value-creating CSR strategy and is designed to support the regions, strive for excellence in our dealings with our customers, partners, mutual shareholders and employees.

**VIS-À-VIS OUR EMPLOYEES**
Responsible human resource policy
For the Group, being a responsible employer means ensuring non-discrimination, equal treatment, encouraging personal development, in particular through training actions, promoting gender equality, diversity of backgrounds and profiles and helping people with disabilities, encouraging social dialogue and quality of working life, and creating a safe work environment in which all employees are treated with dignity and respect.

**THROUGH ETHICAL CONDUCT**

Professionalism and skills
Directors, executives and employees, regardless of their entity or geographic area, must be aware of and apply the laws, regulations, rules and professional standards as well as the procedures applicable to their entity, in order to ensure compliance and to implement them in a responsible manner.

Responsible behaviour
Every Director, executive, employee reflects the Group’s image. Responsible and ethical behaviour is required at all times and in all circumstances: no action is permitted that may harm the reputation and integrity of the Group’s image.

Confidentiality and integrity of information
Group Directors, executives and employees are subject to the same duty of secrecy and are forbidden from improperly disseminating or using, for their own account or on behalf of third parties, any confidential information they may have. Employees must endeavour to provide reliable and accurate information to our customers, shareholders, supervisory authorities, the financial community and stakeholders in general.

Prevention of conflicts of interests
Group Directors, executives and employees must be free of all conflicts of interests in order to, at all times, ensure that the interests of our customers take precedence.

Vigilance
Everyone, Directors, executives and employees, must work to safeguard the interests of customers, combat money laundering and terrorist financing, comply with international sanctions, combat corruption, prevent fraud and safeguard market integrity. Each person must ensure an appropriate level of vigilance given the Group’s business lines and, if necessary, use the alert mechanism, in line with current regulations and procedures.