

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is issued in accordance with Section 54 of the Modern Slavery Act 2015.

It describes the measures taken by Crédit Agricole S.A. during the financial year ended 31 December 2024 to combat the risks of modern slavery and human trafficking in its activities and in its relations with suppliers.

Crédit Agricole S.A. subsidiaries operating in the United Kingdom also publish their own anti-modern slavery statement in accordance with Section 54 of the Modern Slavery Act 2015.

### OUR GROUP, OUR BUSINESS ACTIVITIES AND OUR SUPPLY CHAIN

The Crédit Agricole Group is a bank and insurer present in 46 countries, serving 54 million customers worldwide, including 12.1 million mutual shareholders. The Crédit Agricole Group has 157,000 employees in France and abroad. It is committed to social and environmental issues by supporting the transformations and investment projects of its customers, including multinational groups, SMEs, farmers, tradesmen, associations, local authorities and individuals.

In the course of its activities, the Crédit Agricole Group uses suppliers that may use subcontracting.

### OUR COMMITMENTS

Building on its cooperative and mutualist identity and its long-standing commitments, in 2019 the Crédit Agricole Group defined its Raison d'Être: "Working every day in the interest of our customers and society". It is on this basis, with the desire to anchor its societal value in all its activities, business lines and processes, that the group's strategy is built, guiding its actions through three flagship projects: the customer project, the human centric and the societal project<sup>1</sup>.

It reflects our desire to align our strategy and objectives with the fundamental principles to which we adhere:

- The principles of the Universal Declaration of Human Rights issued by the UN in 1948,
- The 10 principles of the UN Global Compact since 2003,
- The Equator Principles since 2003,
- The Principles for Responsible Investment (PRI) since 2006,
- The United Nations Guiding Principles on Business and Human Rights approved by the Human Rights Council in 2011,
- The United Nations Sustainable Development Goals since 2015,
- The OECD guidelines for multinational enterprises,
- The conventions of the International Labour Organization (ILO) and the performance standards of the International Finance Corporation (IFC),
- The Principles for Responsible Banking (PRB) since 2019.

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<sup>1</sup> [Our vision | Crédit Agricole \(credit-agricole.com\)](https://www.credit-agricole.com)

## OUR POLICIES

These commitments are set out in policies formalising the principles of professional ethics and ethical behaviour in social and environmental matters that apply within our Group, particularly with regard to respect for human rights:

- **CSR sector policies**, which explain the social and environmental criteria applicable to financing and investment activities, including aspects relating to respect for human rights. For each sector covered, a reference framework is determined and analysis criteria are defined that are taken into account in the analysis of transactions as well as exclusion criteria delineating the projects and operations that the Group does not wish to support.
- The **International Framework Agreement**, particularly relating to fundamental human rights and trade union rights, signed between Crédit Agricole S.A. and the UNI Global Union, an international trade union federation for the private services sector, in July 2019. Crédit Agricole S.A. and UNI Global Union renewed these commitments on 9 October 2023, by signing a new agreement called the Global Agreement.
- The **Crédit Agricole Group Ethics Charter** issued in May 2017, which recalls that the Group's principles of action and behaviour comply with the applicable international texts on human rights, the fight against forced and child labour, and the fight against corruption.
- A **Code of Conduct** is formalised by each Crédit Agricole S.A. Group entity to operationally implement the principles of the Ethics Charter and to promote ethical actions and behaviours on a daily basis. After receiving a favourable opinion from the Board of Directors on 14 May 2018 and having been presented to the employee representative bodies in June 2018, the Crédit Agricole S.A. Code of Conduct was published in September 2018 and was updated in 2021.
- The purpose of the **Diversity Charter** adopted in 2008 is to demonstrate the Crédit Agricole S.A. Group's commitment to cultural, ethnic and social diversity within its organisation and the fight against all forms of discrimination.
- The **"Responsible Purchasing" policy** to meet the major challenges of tomorrow and contribute to the company's overall performance. It is structured around six key areas: adopt responsible behaviour in relations with suppliers, contribute to the economic competitiveness of the eco-system, constantly monitor the quality of relations with suppliers, integrate environmental and societal aspects into our purchasing, act for the transition to a low-carbon economy, and integrate this responsible purchasing policy into existing governance systems.
- A **Responsible Purchasing Charter** attached to all supplier contracts and based on reciprocal commitments founded on the fundamental principles of the United Nations Global Compact. A clause on respect for human rights, protection of the environment and the fight against corruption has been added to contracts since 2018. A dialogue mechanism with stakeholders includes satisfaction surveys to gather feedback from suppliers and internal specifiers, an annual supplier meeting, regular business reviews with the main suppliers and a dedicated newsletter (LINK) sent to them every six months.

These documents are available on our website [Our Sector Policies | Crédit Agricole \(credit-agricole.com\)](#).

## MANAGEMENT OF MODERN SLAVERY AND HUMAN TRAFFICKING RISK

Our policies are accompanied by action plans and operational processes implemented within each entity that contribute to control of the risks relating to modern slavery and human trafficking in our activities and in our relations with suppliers. The assessment of these risks is based on an approach differentiated according to the stakeholders and activities concerned.

For Crédit Agricole S.A., the prevention of these risks concerns relations with Crédit Agricole S.A. employees and relations with Crédit Agricole S.A. suppliers and subcontractors.

For each of these scopes, the risk management framework includes policies and action plans incorporating risk identification, assessment and mitigation phases. The level of deployment of these action plans is assessed in order to ensure their effectiveness and to contribute to the continuous improvement of the prevention of these risks.

### In relations with the employees of Crédit Agricole S.A.

On 31 July 2019, Crédit Agricole S.A. signed an international framework agreement with UNI Global Union, the international trade union federation of the private service sector. This agreement particularly covered human rights, basic labour rights and fostering of social dialogue. It built on Crédit Agricole S.A.'s commitments by proposing the same social standards to all its employees, regardless of where they work, and helping to improve working conditions. The agreement provided a reference framework for all employees of the Crédit Agricole S.A. Group in all the countries in which it operates. Crédit Agricole S.A. and UNI Global Union renewed these commitments on 9 October 2023, by signing a new agreement called the Global Agreement.

#### - Preserving health at work and ensuring equity in terms of social protection:

At its sites, Crédit Agricole S.A. ensures that it offers a working environment that preserves the health of its employees and provides prevention, information and support for employees (free screening and vaccination campaigns, ergonomics, nutrition and stress management advice, personalised support for employee caregivers, etc.).

In 2024, Crédit Agricole S.A. published its Health, Safety & QWL Policy on its website, which emphasises that health, safety and quality of life at work are priorities for the group.

Mechanisms for the prevention of psychosocial risks (toll-free numbers, 24/7 counselling service) are deployed within Crédit Agricole S.A. as well as a call centre dedicated to people with disabilities.

In addition, particular attention is paid to the impact on employees during organisational changes and support measures are put in place if necessary (training, awareness-raising, collective agreements). Crédit Agricole S.A. is also actively involved in the social protection of all its employees, particularly in matters related to health, retirement, death, incapacity and disability. Since 2017, Crédit Agricole S.A. in France has provided additional hospitalisation health coverage. Since 2020, the Take Care programme has enabled employees of retail banks in two countries (Egypt and Ukraine) to access health and personal protection schemes (death, disability and temporary incapacity to work cover).

The aforementioned Global Agreement of 9 October 2023 contains a strong commitment to support parenthood. On the one hand, it adopts the principle of 16 weeks' paid maternity leave, available to all Crédit Agricole S.A. employees since 1 January 2021. On the other hand, in line with the 2025 ambition medium-term plan published on 22 June 2022, one of the objectives of which was to extend paternity leave to all Crédit Agricole S.A. entities before the end of 2025, it provides that at the end of its four-year period of application, all Crédit Agricole S.A. employees benefit from 28 days paid paternity leave (these 28 days include days granted for the birth of a child). Finally, the Agreement recommends that entities put in place mechanisms, such as adoption leave, to cover various (co)-parenting scenarios. Crédit Agricole S.A.'s new medium-term plan Ambitions 2025, published on 22 June 2022, confirms these commitments, since one of its objectives is to extend paternity leave to all Crédit Agricole S.A.

entities before the end of 2025. Finally, this Agreement includes a significant commitment on personal protection insurance (incapacity, disability, death and health): it plans to update the inventory of all personal protection schemes in force in the entities carried out at the time of the previous agreement in order to assess the practices of the Crédit Agricole S.A. Group entities in comparison to the national and industry standard. Furthermore, a study conducted in 2021 (with Mercer) on personal protection, health and maternity, as well as the international roll-out of maternity, leave showed that 99.97% of Crédit Agricole S.A. employees benefited from 16 weeks' maternity leave.

Launched at the end of 2023 at the initiative of the Group Human Resources Department, the Assises du Travail brought together 14 Crédit Agricole S.A. companies and seven trade unions for thematic workshops designed to improve employees' working lives. During these workshops, planned in 2024, the parties were invited to discuss psycho-social risks, workload and working conditions as well as work/life balance. Improvement proposals resulting from feedback gathered during the various workshops will be implemented in 2025.

In 2024, with the aim of further improving its employees' working lives, the Group launched a platform with LinkedIn called "LinkedIn Learning", which allows employees to undertake training themselves independently, with access to 22,000 training courses available in 24 languages. This initiative complements others already available, such as those already offered by IFCAM. This gives every employee the opportunity to become empowered and proactive in shaping their future career. LinkedIn Learning offers personalised training to develop employees' business expertise and soft skills, as well as training to improve working conditions (e.g. training in self-confidence, stress management, conflict management, etc.).

In addition to all of the measures mentioned above, as the Crédit Agricole Group is a unified and decentralised Group, "operational" prevention and security measures are also adopted and implemented within the entities, in line with their own activities.

#### **- Ensuring the safety and security of employees**

The Crédit Agricole Group strives to preserve the safety and security of its employees and visitors, customers and service providers present at its sites.

The Safety-Security Division (DSS – *Direction Sécurité-Sûreté*), which reports to the Corporate Secretariat, coordinates and leads the physical Safety-Security business line, which includes all the Safety-Security and Prevention managers (RSSPs – *Responsables Sécurité-Sûreté Prévention*) within each entity and dedicated bodies such as the Group Safety-Security Business Line Committee and the Group Safety-Security Committee, and relies on exchanges with other departments contributing to crisis management where applicable. A procedure describing the general framework, organisation and operation of this business line and setting out the missions entrusted to the Safety-Security Division is published within the Crédit Agricole Group and is regularly updated, in line with the Group's operational policies and security standards.

The DSS analyses and monitors security threats and risks faced by the Crédit Agricole Group, in conjunction with the national public security authorities, in France and abroad. It determines and disseminates the operational security policies applicable by all Group entities concerning "Physical safety and security of non-commercial buildings", "Security of travellers and expatriates", "Crisis monitoring and management relating to the safety of persons and property", "Security of events", "Protection of directors" and "Controls of safety and security of persons and property".

These policies are supplemented by action plans such as the Special Security Plan (PPMS – *Plan Particulier de Mise en Sûreté*) or containment plan.

With regard to the prevention of physical risks that may affect people and property, the DSS collaborates on the crisis management system coordinated by the team responsible for supervising the control systems within the Group Risk Division's Operational and IT Risk Department, responsible for the Business Continuity Plan, including emergency response procedures in the event of a crisis.

The Group's safety strategy is based on anticipating, preventing and training employees to enable them to adopt appropriate behaviours and develop appropriate safety responses.

To this end, three e-learning courses are offered to all employees:

- the first, mandatory since 2018, relates to what to do in the event of a terrorist attack and was presented by the DSS to the Consultation Committee, which brings together all the representative trade union organisations of Crédit Agricole S.A.;
- the second concerning the actions to be taken in the event of safety events such as fire and personal assistance has been validated by the Group Safety Committee and has been mandatory since the end of 2020 for all employees of Crédit Agricole S.A. and its subsidiaries.
- the third, aimed at all group employees who are training to become fire evacuation guides and sweepers, is entitled “Becoming an Evacuation Officer”. This training module has been made available to all entities.

In addition to the regulatory evacuation drills, fire-prevention awareness actions are carried out at the Group’s sites and “evacuation team” training is offered to volunteer employees.

Since 2022, World Day for Safety and Health at Work has been the subject of joint action by the Group’s entities, led by the safety section of the DSS.

In order to strengthen the safety culture within the Group, the DSS runs a dedicated page on the Group intranet site. This contains videos on safety and health rules, which have also been disseminated via campus information outlets.

A project to overhaul the security systems of the Group’s campuses, Evergreen and SQY Park, has been launched and is ongoing, with completion scheduled for mid-2025. All security devices will be replaced with state-of-the-art equipment, controlled by operational security command posts staffed by specially trained teams supported by IT decision-making tools.

#### **- Combatting discrimination:**

Crédit Agricole S.A. is a signatory to the Diversity Charter and has for several years been committed to an approach aimed at promoting diversity and gender equality. This policy in favour of diversity, which is based on the principles of non-discrimination as well as on the integration of diversity of career paths and ages, is particularly reflected in the signing of agreements on topics such as non-discrimination in recruitment, training, promotion, remuneration and work-life balance.

Crédit Agricole S.A. has been a signatory of the Parenthood Charter since 2008 and renewed its commitment to parents within the company by signing the new Parenthood Charter in May 2022. Crédit Agricole S.A. thereby undertook, in particular, to guarantee the principle of non-discrimination in the professional development of employee-parents. Furthermore, on 27 July 2022, Crédit Agricole S.A. also signed the Women’s Empowerment Principles (WEPs), demonstrating its commitment to a culture and practices that advance gender equality and the empowerment of women.

Training and awareness-raising actions are regularly implemented within Crédit Agricole S.A. and annual indicators are used to monitor the results of the measures implemented.

In addition, for Crédit Agricole S.A. and all its entities, particular attention is paid to respecting equal pay for men and women. The emergence of any remuneration discrepancies is subject to enhanced vigilance and measures are taken to rectify them if necessary.

The publication of the French government’s gender equality index highlights the effectiveness of the actions implemented within the Group, which received positive scores. On 31 December 2024, the corporate entity Crédit Agricole S.A. once again obtained scores much higher than required by regulations, with a score of 98/100.

In 2024, Crédit Agricole S.A. confirmed all its commitments in terms of diversity and inclusion in a Diversity Policy, developed collaboratively by around 50 employees. The policy, which can be viewed on the Crédit Agricole Group website, reinforces the importance that Crédit Agricole S.A. attaches to diversity across all business lines and at all levels of the organisation by promoting inclusion.

Finally, the Global Agreement confirms the Group’s commitment to the employment and integration of people with disabilities. This commitment is reflected in a proactive policy driven by the conclusion of three-year group agreements. Indicators measured annually include the number of recruitments of people with disabilities and the volume of purchase contracts entered into with the sheltered employment sector. A seventh Group disability agreement was signed with employee representatives on 21 December 2022 for the period 2023-2025. This was approved on 28 June 2023. Under this agreement,

Crédit Agricole S.A.'s commitments by 2025 include integrating new people with disabilities into its entities and so adopting measures to promote their inclusion, particularly by training and raising awareness among Group employees and providing support with work station adjustments and mobility needs. Since the first agreement was signed in 2005, the employment rate of people with disabilities has increased from less than 2% in 2005 to 5.824% in 2023, and the volume of purchases made from inclusive businesses has increased six-fold over the same period. In 2024, Crédit Agricole S.A. recruited 91 employees with disabilities, 48 of whom on permanent contracts.

**- Maintaining social dialogue within the Group:**

Through its Group Human Resources Department and HR representatives in each entity, Crédit Agricole S.A. maintains ongoing communications with all those involved in social dialogue.

In 2024, through the publication of its HR Policy on social dialogue on the Crédit Agricole Group website, Crédit Agricole S.A. reaffirmed its commitment to the development and maintenance of a rich social dialogue, via Group bodies as well as local bodies, and through the negotiations conducted with the trade unions by Crédit Agricole S.A.

This dialogue is organised at several levels, to take into account the multiplicity of Crédit Agricole Group locations around Europe. As a result, 13 countries (representing more than 90% of Crédit Agricole's employees) are invited to be represented on the European Works Council, which meets annually. Similarly, in France, employee representatives and Management meet twice a year to discuss the Group's strategy and economic and social situation within the Group Works Council.

Two other bodies are also responsible for maintaining social dialogue throughout the scope of the Crédit Agricole S.A. Group:

- the Consultation Committee, in which managers present and discuss strategic issues common to Group business lines and entities with employee representatives, particularly their economic, financial, legal and social aspects.
- trade union correspondents: these correspondents, resulting from the agreement establishing the Consultation Committee, meet with management for monthly meetings in order to foster local social dialogue on all the topics mentioned above. In particular, the situation in Ukraine is regularly discussed with trade union correspondents.

Building on the importance of trade union organisations, whose role is an integral part of Group life, on 8 March 2019 Crédit Agricole S.A. signed an "Agreement on the career paths of employee representatives" which aims to promote commitment to employee representation and to enhance the mandate of employee representatives in their career paths. Through this agreement, Crédit Agricole S.A. undertakes to promote the attractiveness of trade union and elective functions to employees interested in contributing to social dialogue within its entities. Crédit Agricole S.A. also undertakes to promote and respect gender equality in access to trade union and elective functions and to combat any form of discrimination regarding the exercise of those functions. Training and awareness-raising actions on social dialogue have been provided to employees, managers and staff representatives within Crédit Agricole S.A. since 2021 and were repeated in 2023.

## **In relations with suppliers and subcontractors of Crédit Agricole S.A.**

**- Checking that the suppliers or subcontractors with whom we have an established relationship accept the commitments relating to the vigilance system put in place by Crédit Agricole S.A.**

The "Responsible Purchasing" policy applies to the entire Crédit Agricole Group. Shared by all employees and suppliers, it aims to encourage consideration of the right need and economic aspects when making a purchase. This policy is implemented through a "Responsible Purchasing" programme, deployed by Crédit Agricole S.A. and its subsidiaries and shared with the Regional Banks.

This programme, co-constructed with our suppliers and internal specifiers, led to the Crédit Agricole S.A. Group receiving the "Supplier Relations and Responsible Purchasing" label, awarded by the French Ombudsman (*Médiateur de la République*) and by the National Purchasing Committee (CNA – *Comité National des Achats*), including the requirements of the ISO 20400 standard.

The organisation and action plans implemented by the Group as part of the Responsible Purchasing programme make it possible to exercise our duty of vigilance in our relations with our suppliers through centralised management by the Group Purchasing Department, dedicated governance (Group Supplier Risk Committee), reciprocal commitments towards suppliers formalised in our contracts (Responsible Purchasing Charter and specific clause relating to respect for human rights) and ongoing dialogue with our suppliers.

In its contracts, the Crédit Agricole S.A. Group provides clauses enabling suppliers to commit to the principles set out in the “Responsible Purchasing” Charter, an initiative common to several local insurance banks, and also through a specific clause concerning respect for social and human rights. A permanent control indicator has been put in place within the Crédit Agricole S.A. Group to ensure that this clause is properly incorporated in all supplier contracts.

### **- Assessing and managing significant environmental, social and governance (ESG) risks in our Purchasing**

The ESG risk management approach steered by the Crédit Agricole S.A. Group Purchasing Department incorporates elements for identifying categories of at-risk purchases and assessing and mitigating these risks in the purchasing process.

Identification of high-risk purchasing categories is based on an ESG risk map, drawn up in partnership with several local banks, in collaboration with AFNOR. The purchasing categories are divided into four levels of ESG risk. The risk is analysed according to three parameters internal and external to the purchasing categories: the supply chain, the labour intensity and the business environment related to the country concerned by the purchase.

For each purchase category, these three parameters are each analysed on the basis of:

- sources of risk according to the 13 criteria (fraud and corruption, data protection, property rights, health and safety, working conditions, discrimination, modern slavery, child labour, natural resources, pollution, biodiversity, greenhouse gases, and waste),
- the probability of occurrence of events and their severity,
- the consequences, analysed from four perspectives (financial, legal, organisational and reputation),
- the causes of the risk, which will be handled operationally via recommendations (actions to act on the causes, ranked according to priorities).

Following this analysis, the Crédit Agricole SA Group identified three higher risk categories for which actions were taken:

- Property works;
- Promotional items;
- IT equipment.

Companies operating in these business sectors are subject to thorough due diligence. Analysis of the media coverage of these companies is conducted in order to identify any action incompatible with the standards in force, in particular the ILO Declaration on Fundamental Principles and Rights at Work, adopted in 1998.

### *CSR evaluation of suppliers*

Suppliers' CSR performance is assessed at least during the tender phase and during dedicated assessment campaigns. It represents at least 15% of the supplier's overall assessment score during the call for tenders phase. This score is assessed based on four key criteria:

- Environmental and social performance (assessment carried out by a third party and entrusted to Ecovadis);
- Inclusive approaches;
- Decarbonisation commitments;
- Risks specific to the purchase category concerned (based on AFNOR risk mapping).

The supplier CSR assessment system may be supplemented by on-site audits initiated in partnership with three other banks and carried out by an external auditor. The on-site audit process covers human rights, health, safety and environment aspects, particularly for high-risk purchasing categories common to the banking sector.

Additional elements relating to the approach taken by the Crédit Agricole S.A. Group Purchasing Department, particularly with regard to inclusive purchasing and the decarbonisation of purchases, are presented in the CSRD sustainability report.

### *Additional terms and conditions relating to higher risk categories of purchases*

The CSR performance of suppliers belonging to higher-risk purchasing categories is subject to enhanced procedures:

- Third-party rating is mandatory. If a supplier refuses to undergo this assessment, no procurement may be undertaken.
- CSR performance represents at least 20% of the supplier's overall assessment rating during the call for tenders phase.
- Additional criteria are added to the initial questionnaire. For example, in the context of the selection of a supplier of promotional items, the criteria "manufacture of objects from sustainable materials" and "manufacture of objects in a factory certified and audited by an independent body complying with REACH regulations and CE marking" are added. As part of the selection process for a Property Works supplier, the rate of reuse of removed materials must be provided by the supplier.

## **WHISTLEBLOWING AND REPORTING SYSTEM**

In order to strengthen risk prevention, a centralised whistleblowing system is available, not only to Group employees but also to third parties, to enable them to report any breach of Group ethics, policies or procedures. To facilitate reports relating to areas including human rights, health & safety and the environment, these may be submitted via a digital alert escalation and processing tool accessible via a link on our website, at <https://www.bkms-system.com/Groupe-Credit-Agricole/alertes-ethiques>. In the event of an alert, the identity of the person submitting the report is kept confidential, in accordance with regulations.

To support the roll-out of this whistleblowing system, support measures have been made available to entities, including the creation of a shared document space, distribution of guides for employees in charge of alerts, and training of users of the alert processing tool.

Since October 2019, an Alert Management Committee has acted as necessary depending on the level of sensitivity of an alert. This meets at least once a year to review the whistleblowing system (statistical information, analysis of the reason for alerts and the geographic area they were issued).

## CONTINUOUS IMPROVEMENT

The mechanisms for preventing the risks of human rights violations incorporate both the obligations arising from international rules and recommendations and those falling under national law. As a result, the prevention of these risks is developed in line with the measures put in place under the French law of 9 December 2016 on transparency, the fight against corruption and the modernisation of economic life, known as the “Sapin 2 Law” and with the Vigilance Plan established under the French law of 27 March 2017 on the duty of vigilance of parent companies and principal contractors.

Each year, Crédit Agricole S.A. also publishes detailed information relating to the management of environmental, social and governance risks in its Sustainability Report and in the report on its Vigilance Plan, as part of its universal registration document accessible on the website, via the link <https://www.credit-agricole.com/en/finance/financial-publications>.

Crédit Agricole S.A. incorporates the management of risks relating to modern slavery and human trafficking into its extra-financial risk vigilance and management approach, which is regularly reviewed to ensure the effective implementation of its policies and their effectiveness.

The management of these risks is part of a continuous improvement process that focuses mainly on the following areas:

- Adapting the tools for identifying and controlling extra-financial risks by updating the risk maps, if necessary;
- Continuing to deploy targeted action plans to reduce suppliers' CSR risks in the purchasing categories identified as high and very high risk;
- Seeking to involve our suppliers in our approach by regularly discussing our commitments and our responsible purchasing strategy with them.

Montrouge, 14 May 2025

Philippe Brassac  
Chief Executive Officer