



# CODE OF CONDUCT

# CRÉDIT AGRICOLE S.A.



CRÉDIT AGRICOLE  
S.A.

## FOREWORD FROM THE CEO



**OLIVIER GAVALDA**

**By placing the interests of our customers and society at the heart of our Raison d’Être, we commit to going beyond mere compliance to fully embrace the ethical dimension of our actions. Compliance is an essential and indispensable foundation that enables us to conduct our business in strict adherence to legal obligations and the professional standards that apply to us.**

**Ethics, however, invites us to go further. It embodies a higher ambition that is deeply rooted in our identity and reflects our determination to deliver tangible value to as many people as possible. Through this approach, we also affirm our positive differentiation in the marketplace.**

**Our fundamental principles and collective commitments are formalised in our Group Code of Ethics. This Code is translated into concrete, operational terms through the Codes of Conduct developed by each entity and within Crédit Agricole S.A.**

**The Code of Conduct is the essential reference for the ethical and professional behaviour expected of each and every one of us. This practical guide provides clear guidance and concrete examples to enable us to act with confidence in our day-to-day activities, in alignment with our shared values.**

**By adopting it, we strengthen our professional expertise, safeguard our actions, and actively contribute to our reputation for excellence in supporting our customers and partners.**

**I am personally counting on your commitment to fully integrate these principles into your decision-making processes and into all of your actions.**

**Together, let us make ethics the driving force behind our sustainable performance in a world where trust and reputation have become essential strategic assets.**

**Olivier Gavalda,**

**Chief Executive Officer of Crédit Agricole S.A.**

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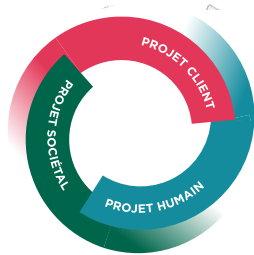
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# UNDERSTANDING THIS CODE

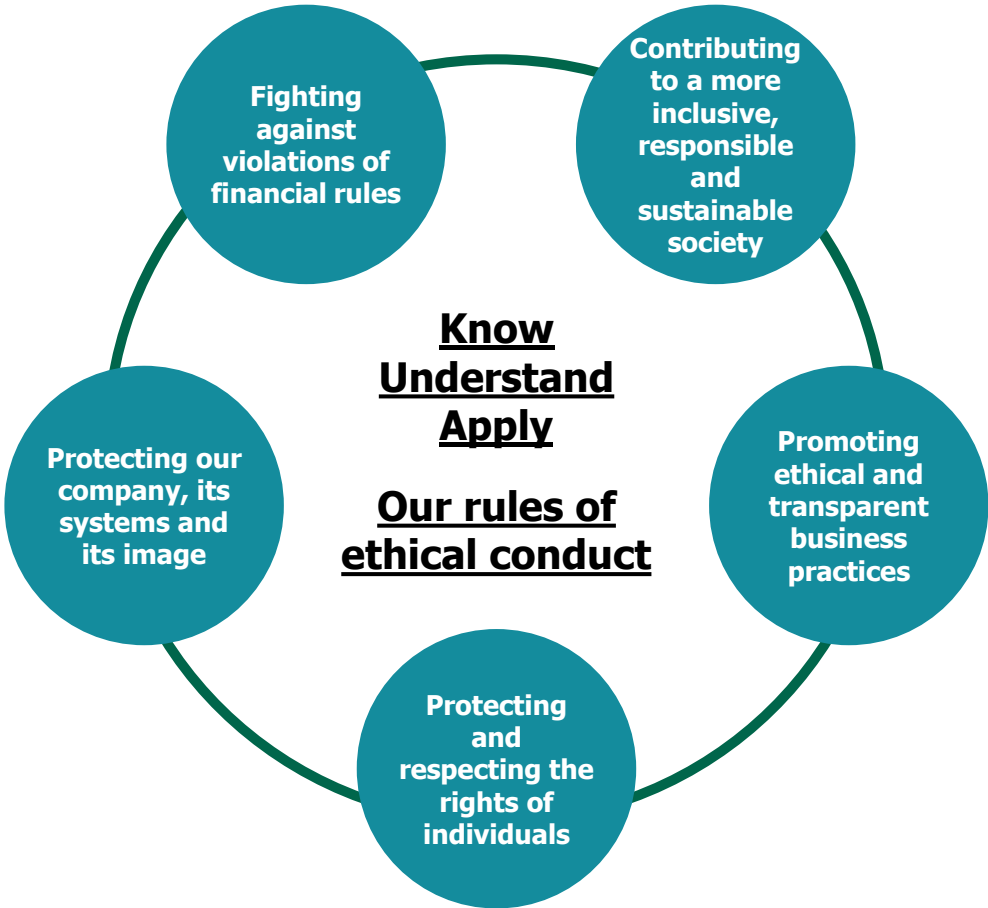



# OUR ETHICAL COMMITMENTS AT A GLANCE

Working every day in the interest of our customers and society



Acting ethically



 If in doubt, in a high-risk situation or in one that goes against our principles: **File a report**

# WHO ARE WE?

At the heart of our universal customer-focused banking model, our Raison d'Être, "Working every day in the interest of our customers and society", commits us collectively. Our behaviours and guiding principles must embody this purpose, everywhere and at all times.

## OUR ACTIVITIES

Our universal customer-focused banking model is based on the close relationship of our retail banks in France and abroad with our specialised business lines. The Regional Banks, LCL, and our international retail banks are at the heart of this model. Our **recognised expertise** in France and abroad, combined with our ability to meet the needs of all our customers by offering a broad range of products and services, allows us to be the **trusted partner of our customers**.

Through this model, we aim to support all our customers and address their full range of needs: financing, payments, insurance, savings management, real estate, international development, support for energy transition challenges, technological services and more.

Within this framework, Crédit Agricole S.A., which ensures **coordination, consistency, and synergies** among the entities, pursues three main missions:

- Representing the Group with the monetary, banking, and supervisory authorities;
- Ensuring unity and financial solidarity in its role as the Group's corporate centre;
- Supervising the Group's domestic and international subsidiaries.

## OUR COMMITMENTS

The commitment embodied in our Raison d'Être must be carried out in an ethical manner. It engages each and every one of us and must be reflected in all our actions.

### For our customers

Crédit Agricole aims to be a trusted partner to all its customers:

- Its solid position and the diversity of its expertise enable Crédit Agricole to offer all its customers ongoing support on a daily basis and for their plans in life, in particular by helping them to guard against uncertainties and plan for the long term.
- Seeking out and protecting its customers' interests in all it does. In advising its customers, the Group acts in a transparent, loyal and educational manner.
- Helping all its customers benefit from the best technological practices and guaranteeing them the support of skilled men and women who are available to assist them.

### For society

- We are proud of our cooperative and mutualist culture, which is reflected in particular in our governance structure that includes representatives of our customers.
- We help local communities by supporting the economy, entrepreneurship and innovation.
- We are committed to social progress and the environmental transition.
- We serve everyone: from the most vulnerable to the wealthiest, from local professionals to large international corporates.

### For our employees

The Group's Project is also expressed through the Human-centric Project, which focuses on empowering employees. Our ambition is to offer our customers permanent access to a trained, independent point of contact who acts with clearly delegated powers.

Because we place individual and collective responsibility at the heart of our managerial, cultural, and human transformation, we recognise the engagement and performance of our employees. We promote the development of their skills by offering them broad career and mobility opportunities.

We act resolutely as a responsible employer towards all our employees, in the face of numerous digital, environmental, and social changes in a constantly evolving environment.

## OUR VALUES

The Crédit Agricole Group promotes the **cooperative** values of **democratic governance**, relationships of **trust** and **respect** for all. These values drive strength and growth. They require behaviour based on **irreproachable ethics**.

Our long-standing values of **close customer relationships, responsibility and solidarity** mean that people drive our actions and are central to our purpose. We are driven by our **sense of responsibility** and our **entrepreneurial spirit** to satisfy our customers, develop regions and seek long-term performance.

<sup>1</sup> <https://www.credit-agricole.com/en/group/the-group-s-societal-project>

# WHAT DOES IT MEAN TO BEHAVE ETHICALLY?

## DEFINITION

Acting ethically means constantly questioning our actions in relation to our values, principles, and societal expectations. Ethics provide guidelines for our decision-making.

Our values are expressed in **ethical principles** and **rules of professional conduct**. These rules form the basis of our code of ethics. They go beyond the prerequisite of regulatory compliance and enable us to highlight our unique characteristics as we carry out our activities, in line with our Raison d'Être.

Our rules of professional conduct and our values are defined and upheld by the company's executives, in particular the Board of Directors and the Executive Committee. These rules guarantee our identity and the trust of our stakeholders.

In addition to acting ethically, we are committed to complying with applicable laws and regulations. This means that:

- We implement internal procedures that transpose laws and regulations;
- We have a prescriptive and supervisory function, which is performed by a senior executive. This enables the company to prevent major non-compliance risks, particularly in regulated business sectors.

**Ethics goes beyond compliance:** it encourages respect for values and rules of conduct so that we can do more to provide the best possible service to our customers. Compliance aims to prevent violations of ethical standards and the law in order to protect the company and its reputation.

## OUR RULES OF ETHICAL CONDUCT

### 1 BEING RESPONSIBLE IN OUR RELATIONS WITH CUSTOMERS AND SUPPLIERS

Our relationships are based on the principles of loyalty, solidarity, and respect for our commitments. We ensure that our decisions **prioritise the interests of our customers**, we select our suppliers **fairly**, and we **comply with rules of competition**.

### 2 RESPECTING INDIVIDUALS

We respect the **human rights and fundamental social rights** of our employees and all stakeholders. These principles allow us to create a **positive working environment** that fosters performance and satisfaction.

### 3 RESPECTING OUR COMMITMENTS TO SOCIETY AND THE ENVIRONMENT

We want to be useful to our customers and society by supporting the **transition to a more sustainable economy**.

Each director, executive and employee is involved in the Group's Societal Project and integrates the issue of climate change and social cohesion into the heart of their activities.

### 4 PREVENTING AND DETECTING CORRUPTION AND INFLUENCE PEDDLING

The fight against corruption is a major objective: **honesty, integrity, loyalty, transparency, impartiality**. We have a **zero-tolerance** policy towards corruption and influence peddling. We are implementing measures to prevent, detect, and deter these practices. We provide mandatory training for all employees as well as additional training for employees in more exposed roles.

### 5 BEING VIGILANT ON A DAILY BASIS

We all exercise particular vigilance to protect **the interests of our customers** and maintain **the trust of our stakeholders**. We use the resources and information available within the company **responsibly**. We prevent conflicts of interest and protect the confidential information at our disposal.

### 6 PROTECTING OUR REPUTATION

We are all responsible for the company's reputation, both internally and externally. To protect it, we adhere to our rules of conduct and remain vigilant in what we say, as our words may commit the Group and affect the trust of our stakeholders.

# WHY HAVE A CODE OF CONDUCT?

Everyone at Crédit Agricole must adopt and promote the values and principles set out in this Code of Conduct. We must all be familiar with and understand the rules of conduct set out herein, and comply with them in the performance of our duties.

This Code of Conduct is the result of a collective effort involving representatives from various departments of Crédit Agricole S.A. and has been presented to its Board of Directors.

## WHO DOES THIS CODE APPLY TO?

The Code of Conduct applies to everyone: directors, executives, managers and employees, regardless of their position and role within Crédit Agricole S.A.

## HOW TO READ THIS CODE

The Crédit Agricole S.A. Code of Conduct sets out specific rules and describes the everyday behaviour to be adopted.

This Code of Conduct is a reference document and a tool to guide employees in their actions and decisions on a daily basis.

It includes practical examples illustrating the concrete application of these principles.

The rules of conduct are presented in four sections:

- Supporting and protecting customers and partners;
- Respecting the rights of all;
- Taking action for a more sustainable society;
- Acting with integrity: the Anti-Corruption Code of Conduct.

The contents of the code may change over time. It does not replace Crédit Agricole S.A.'s internal regulations and procedures.

## WHERE CAN I FIND THIS CODE OF CONDUCT?

The Code of Conduct is a public document that is shared with stakeholders. It is available on the Crédit Agricole S.A. website and Intranet.

Training courses on the topics covered by the Code of Conduct are mandatory for employees.

# HOW TO IMPLEMENT THIS CODE

The ethics programme aims to protect customers and protect employees individually and collectively. Through their roles, managers are responsible for promoting ethical principles.

## EACH EMPLOYEE MUST:

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### ACT IN COMPLIANCE

- Be familiar with and apply the ethical framework and rules established by the Codes and procedures applicable to the employee.
- Complete mandatory annual training.
- Follow instructions from management and the operating rules of the departments.

### BE VIGILANT

- In terms of business and market integrity, responsible finance.
- With regard to societal and environmental commitments.

### PROMOTE ETHICS

- Be exemplary in adhering to ethical principles.
- Be a champion of these principles, both internally and externally.

## EVERY EMPLOYEE CAN:

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### • RECEIVE GUIDANCE ON ETHICAL CONDUCT WHEN THEY HAVE QUESTIONS ABOUT PRACTICAL IMPLEMENTATION

The company offers constructive and supportive guidance to employees on ethical issues. Everyone can talk to their manager and the Legal or Compliance teams in their entity if they have questions or encounter situations involving risks or difficulties for themselves, their colleagues or the Group.

### • FILE A REPORT WHEN FACED WITH A SITUATION THAT VIOLATES ETHICAL PRINCIPLES.

Anyone who is a victim of or witness to a crime, offence or violation of the law or the Group's rules of ethical conduct must report it. They can do so through the chain of command, which is the preferred channel, or through the internal whistleblowing system, particularly if reporting through the chain of command proves ineffective or inappropriate. For more information, see the "Whistleblowing" section.

## EACH MANAGER MUST:

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- Embody the Group's values;
- Set a particularly good example in terms of compliance with ethical rules and the Rules of Procedure;
- Be attentive and create a climate of trust with their employees so that they feel comfortable consulting them in case of difficulty;
- Be able to explain this code to their teams and answer their questions;
- Demonstrate vigilance and transparency to show that targets can and must be achieved in accordance with ethical values and standards.

# SUPPORTING AND PROTECTING OUR CUSTOMERS AND PARTNERS



# PROTECTING OUR REPUTATION

*Any comments we make, whether online or in real life, about our job, our daily work or the Group, may be interpreted, repeated, and disseminated. By being cautious and protecting ourselves, we are also protecting the Group's reputation and our own.*

## DEFINITION

Reputation is one of the Group's intangible assets and results from its visibility and public image. Reputation refers in particular to the general opinion that stakeholders hold of the organisation, brand or entity, particularly based on its past actions, its behaviour and the perception they have of it. Reputation is a form of trust capital that evolves and is built over time through interactions with stakeholders, shared experiences and information disseminated, in particular through the media, word of mouth or public reviews.

## IN MORE DETAIL

In an increasingly polarised society, opinions are becoming more divided and the conditions for calm dialogue are becoming ever more difficult to achieve. The Group may be criticised or even attacked. Reputational risks can significantly undermine confidence in the integrity of the Group and/or its entities. They are considered risks for which the Group has zero tolerance.

These reputational risks arise when a negative perception of the Crédit Agricole Group or its entities/brands, whether justified or not, becomes public. This perception may come from **various stakeholders** such as customers, employees, suppliers, shareholders, investors, supervisors, consumers, the press, NGOs etc.

These risks may be:

- **Internal** (endogenous):
  - Governance and risk management;
  - Product and service quality;
  - Strategy, environmental and societal commitments;
  - Fraud or internal shortcomings etc.
- **External** (exogenous):
  - Cyberattacks;
  - Fines;
  - External fraud etc.

Negative perceptions can damage the Group's reputation and lead to a loss of confidence in the Group or one of its entities or brands. The impact on the Group can be **significant and rapid**. The **material** impacts may take the form of financial losses, reduced liquidity etc. These impacts may also be **intangible**: weakening of the brand, difficulty in attracting new talent, loss of commercial revenue etc.

## OUR COMMITMENT

The Crédit Agricole Group's reputation is an essential form of trust capital that ensures its development. We are committed to:

- **Preserving our reputation** through responsible communication;
- Maintaining **strong governance** and ensuring the **quality** of our products and services;
- Ensuring **compliance with our commitments** to the environment and society.

### Each employee must:

- Anticipate the potential impact of their actions and words on the Group's reputation;
- Incorporate reputational risk analysis when creating new products or offerings;
- Refer to the social media best practices guide;
- Adopt an ethical and reasoned approach on the internet and social media, particularly on networks where the employee is associated with the company.

### Employees must not:

- Respond directly to journalists without assistance from the Press Office;
- Speak on behalf of Crédit Agricole on social media without authorisation;
- Respond to negative comments about Crédit Agricole S.A. Group or its subsidiaries, even with the intention of defending them. Not all topics can be controlled, particularly the most controversial ones;
- Behave inappropriately towards a customer, supplier or any external stakeholder of the Group in the course of their duties within the Group.

For more information, see the [Social media best practices guide | Crédit Agricole \(credit-agricole.com\)](#) (internal document)

# SUPPORT FOR AND LOYALTY TOWARDS OUR CUSTOMERS

*At the Crédit Agricole Group, we place the trust and satisfaction of our customers and mutual shareholders at the heart of our actions. Every employee contributes to this relationship by putting the customer's interests first.*

## DEFINITION

Three systems allow us to analyse and respond to customer expectations:

- **Satisfaction surveys:** in conjunction with retail banks and business lines across all markets, we regularly collect customer feedback to improve service quality and maintain a high-quality relationship;
- **Customer complaint handling:** each complaint is handled with care in order to find solutions and improve our offerings;
- **Employee training:** hard and soft skills are continuously strengthened to ensure appropriate support.

## OUR COMMITMENT

At Crédit Agricole, our goal is to build **strong, lasting** relationships with our customers based on a genuine partnership. We support them at **every stage of their lives** by simplifying things for them. We help them achieve their goals by recommending solutions tailored to their needs.

We also support customers in difficulty, particularly those affected by unforeseen life events, by helping them to rebalance their budget. Finally, we are constantly **innovating** to improve the customer experience by combining **human** and **digital** services. Our **multi-channel** banking model combines efficiency, customer-focus and accessibility for all.

### Each employee must:

- Identify/assess customer needs and act in their best interests;
- Offer tailored advice;
- Provide customers with clear and accurate information that is not misleading;
- Comply with internal procedures to protect the interests of customers and ensure that all offerings brought to the market have been analysed and validated as part of a process known as "NAP" (new products/new activities);
- Actively participate in training to better serve customers;
- Report any compliance issues related to banking and financial regulations to their manager.

### Employees must not:

- Place their personal interests or those of the Crédit Agricole Group before those of their customers;
- Encourage or facilitate actions that do not comply with laws and regulations;
- Offer products or services that have not been approved in accordance with internal procedures (i.e. NAP committee approval of new offerings).

## CASE STUDY

**My application was reviewed by the NAP Committee, which imposed a condition for its approval. Can I quickly launch the product on the market despite this condition, in order to remain competitive?**

No, the NAP process is crucial to ensuring customer protection and preventing the marketing of non-compliant products that could harm customers.

If the NAP Committee gives conditional approval, these conditions must be met before launching the product or service. You cannot market it until all requirements have been met.

# FAIR COMPETITION

We act in strict compliance with competition law, particularly in our relationships with our customers, suppliers and competitors.

## DEFINITION

Competition law guarantees free and fair competition in the markets, particularly for the benefit of consumers. It applies to private and public companies engaged in an economic activity. Compliance with competition law is a **threefold challenge for companies and their employees**:

- **Economic:** in France, for example, violations can result in heavy fines for companies of up to 10% of their consolidated global revenue. They can also give rise to civil suits for compensation for damages suffered;
- **Reputation:** any violation may damage the reputation of the company and the employees involved;
- **Legal:** in the event of a violation, the employees involved may face criminal penalties, including imprisonment and fines (in France, a prison sentence of four years and a fine of €75,000).

Many types of behaviour may violate competition law:

- **Agreements:** agreeing or colluding with a company outside the Group to limit competition, such as price fixing or market sharing;
- **Abuse of a dominant position:** exploiting a dominant position in a market in a way that is unfair to business partners or competitors;
- **Abuse of economic dependence:** taking advantage of a supplier's or customer's state of economic dependence;
- **Restrictive practices:** imposing conditions on a business partner that create a significant imbalance or abruptly terminating established business relationships.

## OUR COMMITMENT

We respect competition law with all relevant stakeholders. In particular, it is strictly **prohibited to engage in cartels with our competitors or exchange confidential (non-public) and strategic information**. Conversely, it is generally permissible to exchange certain information with competitors, provided that it is public, non-strategic, historical or sufficiently aggregated and anonymised by an independent third party.

All employees must comply with the provisions of the procedural memorandum on competition law and complete the required training (e.g., the mandatory training for all employees on "Professional Ethics and Conduct").

### Each employee must:

- Refrain from engaging in conduct that would violate competition law;
- Set their strategy individually and independently, without consulting competitors;
- During meetings with competitors, limit discussions to the agenda and record the discussions in writing;
- If a sensitive topic is raised during a meeting with competitors, end the conversation and leave the meeting if the discussion continues, requesting that your departure be recorded in the minutes;
- In the event of a dominant market position, avoid adopting commercial practices aimed at eliminating competition or obtaining unfair advantages from customers or suppliers;
- Be mindful of the language used in internal and external correspondence, avoiding excessive or ambiguous comments;
- If in doubt or at risk, consult their entity's legal and/or compliance manager.

### Employees must not:

- Exchange confidential and strategic information with a competitor;
- Enter into agreements with a competitor to fix prices, allocate markets, coordinate bids, limit production or boycott a third party;
- Engage in behaviour or negotiate contractual terms that could create a significant imbalance in relations with business partners;
- Ignore or fail to report an anti-competitive discussion or situation to the legal and/or compliance officer of their entity.

## CASE STUDIES

**I am to attend a meeting or participate in discussions as a representative of Crédit Agricole S.A. within a trade association. Which topics do I have the right to discuss and what precautions should I take?**

You may discuss topics of interest to the profession and implement certain actions with competitors, provided that these discussions and actions do not violate competition law.

Remember that:

- Attending, even passively, an anti-competitive meeting between competitors constitutes participation in a cartel;
- The support or presence of representatives of a public authority at an anti-competitive meeting between competitors does not eliminate your liability;
- Meetings between competitors must be formalised with detailed agendas and minutes. You must respond actively and clearly to any situation that you consider high-risk. If in doubt, you should seek advice from your entity's legal and/or compliance officer on how to behave before, during and after such meetings.

**I am representing Crédit Agricole S.A. within the context of its participation in a banking syndicate: what precautions should I take?**

Recourse to the banking syndicate must be justified by the nature of the transaction and the objective reasons, such as risk sharing.

- Always obtain the borrower's written consent before exchanging information with the other lenders in the syndicate;
- Ensure that coordination between lenders strictly complies with the borrower's instructions and is limited to the specific needs of the financing activity.

# CONFIDENTIAL HANDLING OF INFORMATION

*Crédit Agricole S.A. ensures that confidentiality is respected at all times, in particular on social media. All employees are responsible for the use of sensitive information and must handle such information only within an authorised professional framework.*

## DEFINITION

**Confidentiality**, particularly banking secrecy, is a fundamental obligation for all employees. Banking secrecy aims to protect sensitive information and ensure that it is only accessible to authorised persons.

Therefore, **all accurate and non-public information** collected (whether relating to individuals or legal entities, customers or non-customers) in the course of our business activities is confidential and may not be disclosed outside the company.

## OUR COMMITMENT

Confidentiality and banking secrecy must be respected by all.

Confidentiality must also be respected for all **information relating to the operation and organisation of Crédit Agricole S.A.** This also includes data relating to the information systems of suppliers and subcontractors.

The institution and its employees are liable under criminal, administrative, and professional law in the event of disclosure of confidential information. When this concerns non-public information of a listed company, a breach of confidentiality may be criminally, administratively and professionally sanctioned.

This information **must not be shared outside the company**. Within the company, even if individuals are also subject to banking secrecy, it may only be disclosed to individuals who need it to perform their duties.

### Each employee must:

- Strictly respect the confidentiality of information concerning customers, Crédit Agricole S.A. and the Group;
- Always obtain the express written consent of customers before sharing confidential information concerning them;
- Share confidential information within Crédit Agricole S.A. or the group only with the persons concerned and for the purposes of their duties;
- Classify emails according to their level of confidentiality;
- Use a confidentiality agreement before transmitting confidential information to an external service provider;
- Protect confidential information against unlawful use and unauthorised access;
- If in doubt about information to be posted on social media, seek advice from their manager or compliance manager before posting.

### Employees must not:

- Disclose confidential and non-public information about customers or the Crédit Agricole Group;
- Send confidential information to a personal email address;
- Disseminate information, particularly on social media, that could compromise the confidentiality or reputation of the company or its customers.

## CASE STUDIES

### When travelling on public transport, can I take advantage of the time to get some work done?

Laptop, tablet or mobile phone screens without privacy filters can be easily read by other passengers. You should not view confidential documents on a laptop or tablet in a public place unless the screen is protected by a privacy filter.

### I have to draft the minutes of the Strategic Committee and a colleague offered to help me with the formatting. Can I email it to them?

You must guarantee the confidentiality of this document and limit its circulation. If the colleague did not attend a meeting and does not have authorisation, they should not receive the documents relating to that meeting. You cannot therefore assign this task to them.

# INFORMATION SYSTEMS SECURITY

All Crédit Agricole S.A. and Group employees are responsible, at their own level, for the proper use of the information systems to which they have access.

## DEFINITION

Information system security (ISS) encompasses all technical, organisational, legal and human resources used to protect information systems against unauthorised use, errors and cyberattacks.

## OUR COMMITMENT

The Crédit Agricole Group has information systems that are **widely used** every day by customers, partners, suppliers and employees.

However, if these systems are not suitable or if they fail, this can lead to **financial losses, damage the reputation** of the Group, or **expose it to sanctions**. It is therefore crucial to manage IT risks effectively in order to maintain the confidence of all stakeholders.

With the increase in cyberattacks around the world, controlling these risks has become even more important, regardless of the business lines concerned.

In concrete terms, it risks can arise from:

- **Poor organisation** of information systems;
- A failure in their **operation**;
- Inadequate **security**.

**Rigorous management of these aspects is essential** to protect the Group and ensure the reliability of its operations. We apply the **strictest standards to protect these systems** and ensure data security. This includes measures for prevention, detection and response in the event of an incident.

Information system security is based on organisational and technical measures designed to protect system components. These measures enable us to:

- **Prevent, detect and respond** to malicious or negligent activities;
- Guarantee the **confidentiality, integrity or availability** of systems and data.

They also ensure:

- The **authenticity** of information;
- The **accountability** of actions (the ability to attribute an action to a person or system);
- The **responsibility** of users.

### Each employee must:

- **Use secure passwords:** create complex and unique passwords for each account, and update them regularly. Employees have access to the Keepass password manager, which stores passwords securely and can generate passwords that meet the above requirements.
- **Protect their equipment:** secure the hardware (PCs, tablets, smartphones etc.) made available to them, not leave their equipment unattended, lock their workstation when away, secure their PC with a security cable, not lend it to others, not connect cables or external devices whose origin they do not know and use a privacy filter;
- **Update their software:** promptly install updates provided by the IT department;
- **Participate in IT security training:** stay informed about new threats and best practices.

### Employees must not:

- **Mix their professional and personal life:** use their professional email address for personal purposes or vice versa;
- **Fail to be vigilant of suspicious emails:** click on links or open attachments from unknown or suspicious senders. If in doubt, report these emails using the dedicated button or contact the security teams;
- **Use personal devices (PC, smartphone, tablet etc.) for work activities;**
- **Save usernames/passwords on websites;**
- **Share credentials:** disclose passwords.

## CASE STUDIES

### I receive an email that seems suspicious, but I click on the link. What should I do?

It is never too late to report a suspicious email: report it using the “Report suspicious email – phishing” button in your Outlook email account and contact the ISS team immediately.

### I need to exchange large documents with an external service provider. The file size exceeds the capacity of email attachments. What tool can I use?

Use authorised tools such as Postfiles to exchange large files. The use of tools such as WeTransfer or Dropbox is prohibited.

# FAIR SELECTION OF SERVICE PROVIDERS DURING A REQUEST FOR PROPOSALS (RFP)

## DEFINITION

The fair selection of a service provider primarily requires all companies participating in the RFP to be treated equally.

The fair selection of a service provider must result from a fair competition among the companies responding to the RFP. This selection must comply with certain principles and be based on objective criteria.

## OUR COMMITMENT

We are committed to:

- Treating service providers in an identical and fair manner during the entire RFP process;
- Adopting a responsible attitude towards the participating companies. Any decision related to the selection of a service provider must be based solely on professional and objective criteria; personal and/or individual interests must never influence this decision;
- Respecting the principles of fairness, good faith, transparency and equal treatment.

### Each employee must:

- Report any potential risk of conflict of interest (e.g. a personal connection with a service provider participating in the RFP);
- Ensure that all companies participating in the RFP are given a sufficient and identical response time and, to this end, distribute the RFP documents once all the bidding companies have been identified and no additional companies may be added to the list once the RFP has been launched;
- Ensure that all companies participating in the RFP have access to the same information and data (RFP documents, specifications, technical and functional documents etc.);
- In the event of oral presentations, ensure that all of the companies participating in the RFP are invited to one or more sessions, the duration of which must be identical for each of them.

### Employees must not:

- Share different information with the companies participating in the RFP;
- Disclose information to any of the participating companies in the RFP about the content or level of response of other companies participating in the RFP;
- Accept gifts, invitations, and/or any other benefits from participating companies during the RFP. The “gifts and invitations” policy (see specific document) only applies after the RFP and the contract negotiations that follow the RFP have been completed;
- Change the selection criteria, and/or the weighting of the evaluation grid, after the deadline for receipt of RFP responses.

## CASE STUDIES

**I have heard that, during the RFP process, any gifts must be refused. Is that true?**

Yes, any gift, including promotional gifts, or any other benefit such as invitations to restaurants, exhibitions or other events must be refused. Accepting such offers could influence your judgement in the service provider selection process.

**I have found a company that meets my needs exactly. It even comes up with some additional proposals. I decided to forward the company's details to a Crédit Agricole group's buyer so that it could be included in the list of companies to consider for an RFP. Is this the right approach?**

Start by clearly defining your needs and draft specifications. Do not entrust this task to a potential service provider that may be inclined to offer its solution, tool or services that would not necessarily meet your needs, or that may even offer prices that are not in line with market rates.

Then, contact the Crédit Agricole group's Purchasing team so that a buyer can help you prepare a list of service providers to consider. They will support you throughout the process, during the RFP phase and then during the contract negotiation phase, if applicable.

# RESPONSIBLE RELATIONS WITH SERVICE PROVIDERS

## DEFINITION

We carry out reasonable due diligence to ensure that our supply chain players act in accordance with a certain number of commitments and principles, including compliance with obligations related to the duty of vigilance. The due diligence measures allow us to prevent damage to our reputation, image and performance.

## OUR COMMITMENT

We are committed, in particular, to respecting the following principles:

- Financial treatment: paying the service providers' invoices within the applicable legal payment deadlines;
- Respect for human rights and fundamental freedoms (including the provisions of the International Labour Organization's Declaration on Fundamental Principles and Rights at Work of 1998, as revised), French labour regulations, fight against all forms of discrimination, promotion of diversity, and protection of the environment and business ethics;
- Equal treatment;
- Transparency in Crédit Agricole group processes;
- Promotion sustainable and balanced relationships;
- Corruption prevention;
- Full cost analysis covering all costs components incurred over the lifecycle of the goods or services;
- Consideration of CSR (Corporate Social Responsibility in economic, social, and environmental matters) criteria when selecting service providers, particularly in terms of inclusion, decarbonisation and environmental impact;
- Promotion of the regions by choosing local service providers where appropriate.

The diversity of these commitments and principles involves not only Crédit Agricole Group's buyers, but also all employees involved in a commercial relationship with a service provider.

### Each employee must:

- Act fairly with service providers to build a relationship of trust, whether it is a one-off or long-term;
- Consult with the Purchasing teams sufficiently in advance to ensure a compliant purchasing process and managed risks, particularly at the operational, commercial, financial and legal levels;
- Compare the offers submitted by service providers invited to participate in the RFP, based on all the RFP criteria and taking into account the overall cost;
- Inform the companies that have not been selected at the end of a RFP, based on objective criteria;
- During the contractual relationship, ensure a sufficient notice period for any change of service provider, especially in the case of established commercial relationships within the meaning of the provisions of the French Commercial Code;
- Prevent situations that could harm sustainable and balanced relationships with service providers;
- Be vigilant about the precautions to take when a risk is identified, especially regarding the service provider's economic dependence or financial viability.

### Employees must not:

- After receiving goods and/or services, fail to follow up and ignore the applicable legal deadlines applicable for invoices payment;
- Select a service provider without first assessing the risk of economic dependence and continuing to assess this risk throughout the commercial relationship;
- Terminate a contract without providing the service provider with a sufficient notice period to allow them to adapt their activities.

## CASE STUDIES

### I want to launch an RFP and have five days to choose a service provider. Is this possible?

The service provider needs a minimum amount of time to be able to respond in a relevant and comprehensive manner. This timeframe also contributes to establishing a respectful relationship with the service provider.

### I want to continue working with a service provider I am entirely satisfied with. I have been working with this service provider for 10 years now and almost all their revenues are generated from the Crédit Agricole group entities. Is there a risk?

You must assess the risks associated with the service provider's economic dependence and seek alternative solutions with the help of the Purchasing and Legal teams. Indeed, if the commercial relationship were to end abruptly, the risk incurred may be financial, operational, reputational and/or legal, even where the contractual notice period for termination has been observed.

# RESPECTING THE RIGHTS OF ALL



# HEALTH AND SAFETY AT WORK

*We strive to protect the health and safety of our employees on a daily basis.*

## DEFINITION

We must take the necessary steps to ensure the safety and protect the physical and mental health of our employees. This includes:

- Actions to prevent occupational risks;
- Information and training initiatives.

## OUR COMMITMENT

Under French law on the duty of vigilance, we are committed to taking all necessary measures to ensure the safety and protect the physical and mental health of our employees. Each of our employees must be able to thrive in a **safe, collaborative and respectful work environment**.

Safety in the workplace also depends on all of us. Each of our employees must take care, in accordance with their training and the best of their abilities, of their own safety and health, and that of the other persons concerned by their actions or omissions at work.

### Each employee must:

- Become acquainted with, and apply Crédit Agricole S.A.'s health and safety rules;
- Attend mandatory medical examinations required by their job;
- Ensure that their actions do not pose a risk to themselves or others;
- Participate in safety drills and training and report any high-risk situations to the Human Resources department.

### Employees must not:

- Ignore Crédit Agricole S.A.'s rules on health and safety at work;
- Ignore any dangerous situation, i.e. one that could compromise the safety and security of our working environment.

## CASE STUDIES

**I have noticed a change in the behaviour of one of my colleagues: he seems very stressed, isolates himself, has been eating lunch alone for some time and refuses to discuss anything. What can I do?**

This situation troubles you. Talk to your manager or Human Resources so that they can take action quickly, in the best interests of this person.

**The two people responsible for evacuating my unit were both absent during the last fire drill. A colleague did not know what to do. Should I notify someone?**

You have identified a problem that could jeopardise people's safety. You must inform the safety officer in writing. They will then be able to rectify the situation and take the necessary measures to ensure the safety of everyone on site.

# PROMOTING DIVERSITY AND INCLUSION

*We are committed to creating a work environment where every employee can thrive, regardless of gender, age, origin, disability or any other personal characteristic, because we recognise that diversity is a driver of sustainable performance at the heart of our strategy and in support of our corporate social responsibility.*

## DEFINITION

In accordance with the law, we have entered into an agreement regarding gender equality at work between women and men. This agreement is based on an assessment of the inequalities that exist between women and men in the workplace and, in particular, serves as the basis for preparing a plan to reduce them, and to monitor and promote actions that support gender equality at work. We also aim to employ people with disabilities to account for at least 6% of the company's total workforce.

## OUR COMMITMENT

Our goal is to **promote gender equality at work** by giving all employees the same opportunities to access positions, promotions and benefits on the basis of their **skills** and **performance**.

At Crédit Agricole S.A., we believe that diversity enhances performance and attractiveness. We are committed to promoting all forms of diversity. We encourage equal opportunities, openness and curiosity, representativeness, solidarity and responsibility. This creates an open and responsible corporate culture. This culture strengthens **internal cohesion**.

We are committed to:

- Promoting **equal opportunities** in promotions and benefits;
- Encouraging a **balanced representation of genders** and the inclusion of people with disabilities;
- Promoting an **open, supportive and respectful culture** for all.

### Each employee must:

- Be attentive to making an objective judgement focused on skills and performance in all managerial decisions;
- Seek several opinions to ensure objective decisions;
- Maintain a balanced male-female representation on teams whenever possible.

### Employees must not:

- Make a decision on the basis of non-objective criteria;
- Implement processes that could create inequalities, even unintentionally.

## CASE STUDIES

**Most of the people in my team are men. One of my staff is retiring in a few weeks and I'm thinking about replacing them with someone in the team. Should I focus on promoting a woman?**

In this situation, you should analyse each person's skills and performance and give preference to the person who will be best able to fulfil the duties of the position.

**I have received multiple applications for a vacant position on my team. After carrying out several interviews, it turns out the person whose skills are most in line with the job requirements is disabled. How will my team react?**

Recruitment must always be based on skills. If you have any concerns about the integration of this new employee, please contact Human Resources. The Disability Integration Manager at your entity will assist you in putting the necessary measures in place to integrate the employee smoothly into the team.

# COMBATING DISCRIMINATION

At Crédit Agricole, we do not tolerate any form of discrimination, whether direct or indirect. We promote diversity as a source of performance and motivation.

## DEFINITION

Discrimination is a form of **unequal treatment** that is based on a prohibited criterion and falls within the area covered by legislation. In specific terms, discrimination is the act of distinguishing someone on the basis of a set of criteria or distinctive characters.

The law on discrimination currently in force in France defines **25 discrimination criteria**:

- Origin;
- Gender;
- Surname;
- Address;
- Physical appearance;
- Lifestyle;
- Bank information etc.

Discrimination can be:

- **Direct**: one person is clearly disadvantaged compared to another in a comparable situation;
- **Indirect**: an apparently neutral rule or practice creates a disadvantage for certain people, without legitimate justification.

## OUR COMMITMENT

Any discrimination may result in the sanctions mentioned in our Rules of Procedure. We are committed to **raising the awareness of executives, managers and employees** about the challenges of non-discrimination, such as:

- Acting in favour of gender equality and diversity is to allow employees to feel they are treated fairly from the moment they are hired, and throughout their career in the company.
- Promoting a working environment in which everyone feels respected, regardless of their unique character, enhances performance and drives motivation.

### Each employee must:

- Reject all forms of discrimination against employees, customers, suppliers, services providers and other persons with which they have relationships;
- Take action if they are a victim of or witness to discriminatory behaviour by reporting it to their manager or Human Resources or via the secure whistleblowing platform (see Whistleblowing section);
- As a manager, base decisions solely on objective and professional criteria.

### Employees must not:

- Treat people differently on the basis of criteria prohibited by law, which places them at a disadvantage compared to others;
- Ignore or downplay a situation of discrimination, whether witnessed or reported.

## CASE STUDY

**I am a manager; an employee who is close to retirement has asked me to provide training related to his job, offered by an external organisation. What should I do ?**

As an employer, you have an obligation to ensure that your employees, regardless of their age, are suited to their job and to ensure that they remain capable of performing their duties, particularly in light of changes in jobs, technologies and organisations. Refusing to provide training on the grounds that the employee is approaching retirement would constitute age discrimination, which is prohibited. You must therefore assess the request based on the relevance of the training to the employee's duties, not on their age.

# THE FIGHT AGAINST HARASSMENT

*We want to guarantee our employees a respectful working environment in which everyone feels safe. We do not tolerate any form of psychological or sexual harassment.*

## DEFINITION

Psychological harassment manifests itself through repeated comments or behaviour that degrades a person's working conditions, infringes on their rights or dignity, impacts their physical or mental health, or compromises their professional future. These acts are punishable by law.

Harassment can be:

- **Psychological:** derogatory remarks, humiliation or bullying, insults etc.
- **Sexual:**

– The act of repeatedly making sexual comments towards or imposing behaviour of sexual nature on a person that undermines their dignity because of its degrading or humiliating nature or that creates an intimidating, hostile or offensive environment;

– The use, be it recurring or not, of any form of serious coercion for the purposes of obtaining an act of a sexual nature, for the benefit of the perpetrator or for the benefit of a third party.

## OUR COMMITMENT

We are committed to **preventing, detecting and taking action against all forms of harassment**. These actions constitute **offences that are subject to severe penalties** and may result in the sanctions outlined in our Rules of Procedure.

In France, every company with more than 250 employees appoints a representative responsible for combating sexual harassment and sexist behaviour. You can contact the Human Resources department to find out the name of the designated representative.

Any employee or representative trade union may refer a matter directly to a joint committee on the prevention and treatment of psychological or sexual harassment.

Employees, trainees or interns may not be penalised for having suffered or rejected harassment. They may not be dismissed or discriminated against for having reported such incidents.

### Each employee must:

- Become acquainted with the company's **internal policies and procedures** on preventing and acting against harassment;
- **Speak to their manager or Human Resources** if they are a victim of or witness to harassment or use the secure whistleblowing platform (see Whistleblowing section).

### Employees must not:

- Ignore a situation of harassment that they know about, whether they are the victim or a witness, irrespective of the reason or the alleged ramifications.

## CASE STUDIES

**A colleague of mine is being repeatedly subject, in a humiliating way, to criticism of his work and being reprimanded in front of the rest of the team. His work is systematically called into question and he is being reprimanded without any verification of the performance of his tasks. He is taking more and more time off for sick leave.**

In this situation:

- Remind everyone that relationships in the workplace must be fair and respectful;
- Quickly get in touch with your manager or Human Resources contact so that they can take action rapidly to put an end to this situation of harassment.

**A colleague is particularly intimidating and humiliating. She frequently makes sexual innuendos towards me and behaves inappropriately. Despite my insistence that she stop this behaviour, she keeps pestering me for a date.**

Report this unacceptable behaviour immediately to your manager or Human Resources. You can also ask for help from an employee representative to accompany and support you in order to put an end to this situation as quickly as possible.

# PROTECTING PERSONAL DATA

We are committed to processing personal data ethically, responsibly, transparently and instructively. These principles apply to our customers, our employees and anyone else affected by this data.

## DEFINITION

Personal data protection guarantees the privacy of every individual, whether they are customers, employees, candidates or partners. It is governed by the General Data Protection Regulation (GDPR), which sets strict rules for the collection, use and storage of this information.

## OUR COMMITMENT

The use of personal data is strictly governed by clear rules that apply to everyone:

- **Information and rights of individuals:** all individuals concerned must be informed of the use of their personal data. They have certain rights, including:
  - The right to access and rectify their data,
  - The right to object to the processing of their data for legitimate reasons;
- **Data minimisation:** only data that is relevant and necessary to achieve predefined objectives may be used;
- **Retention period:** personal data may not be retained indefinitely;
- **Confidentiality and security:** measures must be put in place to ensure data confidentiality and prevent unauthorised access;
- **Processing register:** all personal data processing must be recorded in a document called a "processing register", which must be regularly updated.

The destruction, loss, alteration, disclosure or unauthorised access to personal data may infringe upon the **rights of individuals**, including those of employees. **Compliance with internal rules and procedures** is therefore essential.

Beyond its legal obligations, the Group has adopted a **charter for the use of customer data** based on five key principles:

- **Usefulness and loyalty:** data is used in the interests of customers;
- **Ethics:** data processing complies with strict moral rules;
- **Transparency and education:** customers are clearly informed about the use of their data;
- **Security:** data is protected against the risks of loss or unauthorised access;
- **Customer control:** customers retain control over their data.

This charter is the reference framework for all employees who process personal data.

## Adopting the right habits

To help employees respond appropriately to situations relating to personal data protection, the data compliance unit of the compliance department has provided practical fact sheets entitled "Adopting the right habits".

These explain the essential actions to take, particularly in the following situations:

- Receiving a request from an individual exercising their rights (access, objection, deletion etc.);
- Creating a list of professional contacts;
- Detecting a personal data breach.

The fact sheets can be viewed at this link: [02 - Adopting the right habits sheets \(internal document\)](#)

## Each employee must:

- Verify that the data collected is useful and necessary to achieve a specific objective;
- Collect and use personal data in a manner that is transparent to the individuals concerned by informing them about the processing carried out;
- Guarantee peoples' right to privacy, notably by not transmitting their information to unauthorised persons and ensuring personal data are kept securely;
- Ensure that subcontractors comply with these same principles;
- If in doubt, contact the GDPR officer of their department or the Data Protection Officer (DPO);
- Ensure that all new projects take into account the protection of personal data from the design stage and by default (which requires, in particular, consulting the Chief Information Security Officer – CISO);
- Immediately report any data breaches (data leaks, accidental or malicious alteration or destruction of personal data) to the CISO and the DPO.

## Employees must not:

- Make any use whatsoever of personal data that does not respect the key principles indicated in the Code;
- Collect and/or process personal information that does not correspond to a specific and necessary use or without the individuals concerned (customers, employees, candidates, directors etc.) having been informed beforehand;
- Transmit data to unauthorised persons;
- Store personal data indefinitely.

## CASE STUDIES

**I want to build up my customer database with information that appears to be public (such as profiles published on social media). This will enable me to carry out more in-depth analyses and gain greater insight into their private lives. Do I have the right to do this?**

Even if this information is publicly available, you may only use it if:

- Customers are informed of this collection;
- Their consent is obtained if necessary, depending on the intended use.

However, this data may be unreliable. Before acting, ask yourself whether its use is truly appropriate.

To proceed safely:

- Consult the personal data charter for guidance on best practices;
- Consult with experts from the legal and compliance departments and the data protection officer to validate your approach.

**I copied some personal employee data so i could continue my work while travelling, but my bag containing my laptop and documents was stolen on the train. Should i report this?**

Yes, you must immediately report this theft to your manager, the Chief Information Security Officer (CISO) and the Data Protection Officer (DPO).

The theft of your computer, which contains personal data, can have serious consequences for the company and the employees concerned. This includes legal, financial and reputational risks.

To avoid this type of situation in the future:

- Limit as much as possible the extraction of data from secure tools and applications to office equipment, which offers a lower level of security.
- Make sure you work in secure environments and never transport sensitive data without adequate protection.

Acting quickly minimises impact and protects those involved.

# SUPERVISION OF EXTRA-PROFESSIONAL ACTIVITIES

*We are vigilant in ensuring that our extra-professional activities or commitments do not harm the company or cause conflicts of interest.*

## DEFINITION

An extra-professional activity is an activity that is undertaken outside one's working hours. Polyworking is the simultaneous exercise by the same person of two or more activities of a professional, trade union or political nature.

## OUR COMMITMENT

Activities outside the professional sphere, such as involvement in associations, politics, or businesses **are permitted**. However, they must **comply with certain rules** to avoid any conflict of interest or negative impact on the company.

Employees must respect a professional **code of ethics** with respect to their employers. For the duration of their employment contract, they are bound by an **obligation of loyalty** to their employer. This obligation involves taking care not to tarnish the reputation or prevent the proper functioning of the company, notably by committing acts of disparagement or undertaking competitive practices that would be against the interest of the company.

### Each employee must:

- Inform their manager beforehand if contemplating exercising a remunerated activity outside their working time (except for the production of scientific, literary or artistic works);
- Declare the status of their situation to the Compliance Officer if necessary;
- Respect the obligation of confidentiality, professional secrecy and trade secrets;
- Be well acquainted with the terms of their employment contract in order to apply the clauses that they are required to respect. If necessary, ask the human resources department to explain it to them.

### Employees must not:

- Exercise an activity that competes with that of the company during the term of their employment contract (including using a period of leave to perform a remunerated activity or training period with a company, whether or not it is a competitor);
- Engage in a personal activity that could create a conflict of interest with their role within the company;
- Exercise their extra-professional activity during the working time defined in their contract;
- Use company equipment, information or premises for personal activities.

## CASE STUDY

**I am a volunteer in a local association whose values seem very close to those of Crédit Agricole. Can I use the office photocopying machine to print the association's advertising materials?**

No, you cannot use company materials or any other corporate resources for the purposes of any extra-professional activity.

# TAKING ACTION FOR A FAIRER AND MORE SUSTAINABLE SOCIETY



# CONTRIBUTION TO ENVIRONMENTAL ISSUES

*We seek to support the transition to an economy that drives innovation and progress, while respecting environmental limits, promoting social justice and defending fundamental human rights.*

## DEFINITION

The European Commission defines Corporate Social Responsibility (CSR) as the voluntary integration of social and environmental concerns into the business activities of companies and their relations with their partners. Our partners are our customers, members, employees, shareholders, suppliers and all the stakeholders with whom we interact.

In other words, CSR is the contribution of companies to the challenges of sustainable development.

## OUR COMMITMENT

In terms of the environment, we are committed to:

- Taking into account our partners' expectations;
- Fully meeting legal obligations or even going beyond them;
- Implementing the group's societal project;
- Preventing and mitigating our impact on the environment, people's health and safety, human rights and fundamental freedoms (duty of vigilance).

Crédit Agricole S.A. supports the environmental transition and is gradually integrating the issues of climate change, the protection and preservation of nature, and social cohesion into the heart of its businesses.

Our commitment is expressed through five key areas:

### • **Developing renewable energy:**

Financing and investing in green energy projects,

Offering our customers savings solutions dedicated to the energy transition, such as those provided by Crédit Agricole Transitions & Energies;

### • **Supporting the transitions of all our customers:**

– Offering solutions for innovation and access to low-carbon energy, such as the “Livret engagé sociétaire” savings account and “J'écorénon mon logement” home renovation programme,

– Encouraging low-carbon mobility and housing with offers such as those proposed by Crédit Agricole Personal Finance & Mobility or “Immobilier bas carbone”,

– Pursuing our Net Zero commitments for our financing and investment activities;

### • **Reducing our dependence on fossil fuels:**

– No longer providing financing for new fossil fuel extraction projects,  
– Ending the financing of independent producers dedicated exclusively to oil or gas exploration and production;

### • **Protecting biodiversity and natural capital:**

– Assessing the impacts of biodiversity loss on our activities,  
– Integrating biodiversity criteria into our policies,  
– Mobilising resources for projects that benefit nature,  
– Supporting collective initiatives against the decline of ecosystems,  
– Reducing the impact of our activities and promoting biodiversity at our sites;

### • **Reducing our environmental footprint:**

– Optimising our energy consumption, building management, data centres and business travel,

- Preserving natural resources,
- Promoting biodiversity at our sites.

Regulations on the duty of vigilance reinforce the protection of human rights and fundamental freedoms, people's health and safety and the protection of the environment.

### Each employee must:

- Take into consideration the direct and indirect impacts on the environment generated by their work;
- Commit to contributing to the group's role as a supporter of the climate transition and as an influencer for a more sustainable economy, particularly in their dealings with customers and stakeholders, and in any external communications.

### Employees must not:

- Ignore the group's climate transition targets and commitments;
- Ignore issues related to human rights and personal safety.

## CASE STUDIES

**A colleague believes that because we already comply with environmental legislation, it is pointless to implement any new environmental measures.**

You can explain to them that the Group's environmental commitment goes far beyond compliance with laws and regulations. Our environmental policy and our CSR (Corporate Social Responsibility) approach are performance drivers and key elements of our identity. Key benefits include:

- Cost reduction: by reducing our consumption of commodities, we significantly reduce our expenses;
- Risk management: anticipating environmental impacts allows us to limit risks for both us and our customers;
- Growth opportunity: financing the environmental transition represents an opportunity to develop innovative and sustainable activities that are essential for the future.

These commitments generate positive impacts for all our stakeholders, thereby strengthening our position as a responsible leader.

**I do not really understand what environmental issues have to do with us. We are not an industrial company with factories.**

We are a major player in the banking sector, and our position as a leader means we have a duty to set an example. Our decisions can steer industrial projects to adopt more virtuous techniques. Our own activities have an environmental impact, even though we are not an industrial company. For example:

- Construction and management of our buildings;
- Employee travel;
- Use of our IT systems;
- Sorting and management of our waste.
- Our environmental policy is fully integrated into all our activities and businesses. It fosters innovation to serve our customers and society.

# CONTRIBUTING TO REGIONAL DEVELOPMENT

*We use our cooperative model to build a more united, sustainable and inclusive future for all, and we are committed to promoting the momentum and attractiveness of our regions.*

## DEFINITION

More committed than ever to upholding our cooperative and mutualist values, we contribute to regional development on a daily basis. We support their momentum and work towards fairer economic development.

## OUR COMMITMENT

### A mission to serve customers and society

Our raison d'être places equal importance on our usefulness to our customers and our usefulness to society. This commitment is reflected in particular by:

- Participating in the social and economic development of the regions;
- Supporting local entrepreneurship;
- Directing savings towards projects with a positive impact;
- Improving public infrastructure dedicated to education.

We encourage our employees to participate in various economic, social and cultural development initiatives.

### Concrete actions for solidarity and inclusion

We also take action to prevent and support situations of vulnerability or insecurity and contribute to the development of emerging countries by fighting poverty and exclusion and supporting agriculture and rural development.

### Values rooted in a changing world

Since our creation, we have placed usefulness and universality at the heart of our cooperative and mutualist model. These values are now more essential than ever to support societal change and respond to the uncertainties of today's world.

- **Universality:** serving everyone, everywhere, and offering financial solutions that are accessible through all channels;
- **Comprehensive support:** supporting economic players and regions in their development through a comprehensive range of environmental and social offerings.

### A social strategy in action

We express this combination of societal utility and universality through an ambitious social strategy:

#### Inclusive offerings

- Products accessible to the most vulnerable customers,
- Special support for young people and vulnerable populations,
- An insurance prevention policy;

#### Revitalisation of vulnerable regions

- Investment in social housing and the financing of social bonds,
- Support for social and solidarity economy players,
- Support for initiatives with a strong societal impact;

#### Responsible employer

- Promotion of the group's attractiveness,
- Commitment to the safety and well-being of employees.

#### A strengthened regulatory framework

Regulations on the duty of vigilance complement this commitment by protecting:

- Human rights and fundamental freedoms;
- The health and safety of individuals;
- The environment.

### Each employee must:

- Understand and address how our activities (operations, products and services) may have a negative impact on people's human rights;
- Understand that regional support is an integral part of the group's culture. Customer-focus, responsibility and solidarity are the values that should provide encouragement to contribute to actions designed to improve regional development conditions;
- Automatically take into account local characteristics in their professional activities;
- Work for social cohesion and harmonious coexistence in the regions where they work, in line with the Group's Raison D'être.

### Employees must not:

- Involve Crédit Agricole S.A. in actions that do not respect the Group's regional commitments.

## CASE STUDY

### I don't really understand why Crédit Agricole S.A. is involved in contributing to the regions: I would have thought that was the role of the Regional Banks?

Three examples demonstrate how Crédit Agricole S.A. contributes to the economic development of the regions:

- Crédit Agricole S.A. regularly issues social bonds to support local, sustainable and inclusive growth in the regions. It aims to revitalise regions and reduce social inequalities, in particular by promoting employment, through financing in the regions most severely affected by the crisis.
- part of our operating purchases are made from local suppliers. The Crédit Agricole Group takes care to include local players in each purchasing project where relevant: to develop employment in the regions (VSBs and SMEs, companies located in rural revitalisation zones, in priority urban neighbourhoods, and social and solidarity economy companies – ESS) and as a lever for the employment of vulnerable groups (sheltered and disability-friendly working structures, workforce integration structures);
- with its ambition to contribute to a sustainable economy, Crédit Agricole has decided to create two new business lines: Crédit Agricole Transitions & Énergies (Transitions & Énergies) (regional energy provider, making transitions accessible to all and accelerating the development of renewable energy in the regions) and Crédit Agricole Santé & Territoires (Health & Territories).

# USING SOCIAL MEDIA

*We use social media reasonably and take care not to make comments that could harm the Group or our employees.*

## DEFINITION

The term “social media” generally refers to all websites that can be used to build a network of personal or professional contacts and to exchange opinions or information. It is a generic term that covers both technology and social interactions involving the creation and publication of text, images, videos and audio.

Social media, blogs, forums, instant messaging and other digital media are now **omnipresent** in our daily lives, whether **personal or professional**. However, with the large number of platforms and the massive flow of information, it is essential to **control how you communicate** to avoid any negative impact.

## OUR COMMITMENT

We are present on numerous social media networks (X, Facebook, LinkedIn, Instagram, TikTok, YouTube, Discord etc.) to interact with customers and stakeholders, while ensuring that **comments are respectful**.

Employees retain their freedom of expression both inside and outside the workplace. However, this freedom must be exercised **responsibly**:

- Personal use of social media at work is permitted, provided it is **occasional and reasonable**;
- Comments must **never be detrimental** to the Group, its executives, its customers or your colleagues.

### Each employee must:

- Respect the rules of confidentiality and banking secrecy to which they are bound by professional obligation;
- Be aware of the general conditions of use concerning how their personal data and the information they post online may be used;
- Pay particular attention to social media networks whose servers are located in a foreign country. They may not have the same personal data protection rules as in France;
- Check their settings functionalities to ensure the confidentiality of their profile and comments;
- Specify that their comments are their own and that the opinions expressed are personal;
- Do not intervene directly if they read any negative or slanderous comments about the Group so as to avoid giving the authors more visibility. When they come across such comments, forward them to the Group Communication department;
- If in doubt about the nature of the information, refrain from interacting on social media and ask their manager.

### Employees must not:

- Engage in professional activities on social media without prior authorisation;
- Speak officially on behalf of Crédit Agricole without being a designated spokesperson;
- Disclose internal information without the approval of the Group Communication department;
- Publish defamatory, abusive or malicious comments or disclose confidential information;
- Use content protected by Crédit Agricole S.A.'s copyrights without written authorisation.

## CASE STUDIES

**I took some pictures at the leaving party of one of my colleagues and would like to post them on my personal page as a souvenir.**  
Ask for permission from the people concerned in order to respect their image rights. Consider the risk that it could damage your reputation or that of other individuals or legal entities.

**As part of a new project, a colleague suggested I create a group on LinkedIn so that we could exchange information between ourselves and share documents.**

Refuse: we do not allow employees to conduct business on social media, with some exceptions. Instead, suggest starting a Teams group to facilitate this collaborative work.

**I want to create or update my LinkedIn account, and publish information about my activity with Crédit Agricole S.A.**

You can outline your duties and the activity of the Company in general Do not disclose any confidential information or mention any “sensitive” aspects of your job.

**I want to share a news item from the internal newsletter on my LinkedIn account**

Seek advice from the Group Communication department. Information sent to employees is not necessarily intended to be shared online with external audiences.

# USE OF ARTIFICIAL INTELLIGENCE

We develop and use artificial intelligence tools responsibly, respecting privacy, regulations and our internal rules on the subject.

## DEFINITION

Artificial Intelligence (AI), including generative AI, is used to automate, optimise and personalise our existing or new processes.

During the learning phase, it looks for the link between input data and expected results to create a model. Once used in production, this AI model can be used to predict behaviour, make recommendations or assist in decision-making, for example.

AI is increasingly present **in our personal and professional lives** and can have a major impact. It must be used **responsibly**, taking into account both the benefits and the risks.

All AI uses data for learning and during production use. The **rules and principles relating to data use** apply in full to projects involving AI (security, confidentiality, rules of use, personal data etc.).

## OUR COMMITMENT

We are committed to promoting trustworthy and responsible AI, in line with our Raison d'Être.

### Use of data

Data management is based on:

- The **governance system** in place;
- **Applicable data regulations** such as the GDPR and the positions defined by the group;
- **Dedicated committees** to support project leaders.

One example is the **group data usage committee**, which ensures that data usage complies with regulations and group rules. At the request of project leaders, this committee provides advisory opinions on all types of data usage, including projects related to artificial intelligence (AI).

### Development and use of AI

A **specific normative framework** has been put in place to govern the development and use of artificial intelligence. This framework:

- Is based on European regulations and the Crédit Agricole Group's commitments;
- Is available in the form of a **Procedural Note**;
- Specifies the rules to be followed for all AI solutions, whether developed internally or by third parties.

These rules apply to all employees, regardless of their role, to ensure the compliant and responsible use of data- and AI-related technologies.

### Employees must not:

- Use publicly available AI that has not been approved by the Group;
- Send company data, customer data or any other data to AI without first checking the validated terms of use.

## CASE STUDIES

### Can I use an AI tool available online to help me write professional documents?

Before using AI in a professional context, you must:

- Check whether the solution complies with the Crédit Agricole Group's AI regulatory framework;
- Take into account all other rules and standards applicable within the Group.

### I'm not sure about a response provided by a Group-approved AI system. What should I do?

All AI systems can make mistakes:

- It is your responsibility to verify the information provided, even if it seems consistent;
- If you are unsure or disagree with the result, do not use it.

### Each employee must:

- Comply with all Group rules relating to data use;
- Seek advice from Group bodies such as the Group Data Usage Committee (via the Group Data Management Office) when necessary;
- Refer to the Group AI regulatory framework when developing, operating or using an AI solution;
- Apply the Group's ethical principles and be transparent in the use of AI.

# THE FIGHT AGAINST FRAUD

*The involvement of every employee is essential to effectively combat fraud. Everyone has a responsibility to prevent fraudulent acts by complying with the legal and regulatory framework, ethical rules and internal procedures.*

## DEFINITION

Fraud is an intentional act aimed at obtaining a material or intangible benefit, to the detriment of a person or organisation. This behaviour violates laws, regulations or internal rules.

## IN MORE DETAIL

In terms of operational risks, there are two types of fraud:

- **External fraud** is committed by third parties, whether they are customers or not, acting alone or in a group. They may use their real identity, a false identity or act on behalf of a legal entity. Their objective is to obtain funds, documents or information for their own benefit, to the detriment of a Group entity, its customers or third parties;
- **Internal fraud** involves the participation of a Group employee, either acting alone or in collaboration with external parties (mixed fraud).

## OUR COMMITMENT

**Combating financial crime**, including fraud, is useful to society. The fight against fraud also helps **reduce reputational risks** and contributes **to protecting our customers**. Strengthening our anti-fraud measures is therefore part of our Group Project.

Our measures must detect and prevent fraud through appropriate governance, organisation and tools.

**Fraud: a major challenge.**

Fraud not only causes financial losses but also significant damage to the Group's reputation. It can also be linked to illegal activities, such as money laundering or terrorist financing, which are **regulatory risks**.

### Each employee must:

- Be familiar with the best practices and regulations that apply to their work and ensure that they are applied responsibly. Individuals may be held personally liable, regardless of their position, the entity to which they belong or their geographical location;
- Immediately alert their manager and the Group Compliance Fight against Fraud Steering Team so that they can act quickly in the event of suspected fraud or uncertainty;
- If in doubt about the identity of the sender of an email, use the "Report a suspicious email – Phishing" feature so that the it teams can carry out the necessary checks;
- If they are a manager, assess the risk of fraud and the risk control measures for activities within their scope, and enforce the principles of good conduct and the rules set out in the Rules of Procedure;
- Perform fraud-risk analysis at the start of the design process for new products and new activities;
- Respect the principle of segregation of duties, whereby those carrying out or executing an operation cannot approve it or make the payment.

### Employees must not:

- Share their passwords, lend their access badges or leave confidential documents or information on their desks;
- Open emails or attachments from an unknown sender;
- Discuss sensitive or confidential matters in public places;
- Use external media (external hard drives or USB drives) that have not been checked beforehand for fraud risks.

## CASE STUDIES

### I just received an email asking me to provide my personal mobile phone number in order to discuss a confidential and urgent matter. What should I do?

Do not give out your personal mobile phone number in response to an email request.

This type of email is often used by fraudsters to put pressure on employees outside of the Group's systems. Their goal is to obtain a bank transfer or sensitive information (e.g. organisational charts).

### I just received a request from a supplier informing me that their invoices must now be paid to a new bank account. How should I respond?

This could potentially be a case of bank transfer fraud.

It is essential that you follow the Group procedure and confirm the legitimacy of the supplier's request by making a return call. If fraud is confirmed, contact the Group Compliance Fight against Fraud Steering Team.

### I just received an email from an external address asking me to change the bank details used to pay an employee's salary. The sender claims to be the employee in question. How do you handle this request?

This could potentially be a case of bank transfer fraud. Remind the sender of the procedure for this type of request and the tool to use. If fraud is confirmed, contact the Group Compliance Fight against Fraud Steering Team.

### Someone contacts you via social media. They ask you for your company's organisational chart and offer to pay you for it. What do you do?

This is someone collecting information in order to commit CEO fraud. Do not respond to their requests.

# PREVENTION OF MARKET ABUSE

We take all necessary measures to preserve the integrity of financial markets. To this end, we comply with the procedures set up by the company.

## DEFINITION

Market abuse refers to illegal behaviour related to activities on financial markets. It includes:

- **Insider dealing**, which consists of using insider information by:
  - Acquiring or selling of, on one's own behalf or on behalf of a third party, directly or indirectly, financial instruments to which that information relates;
  - Cancelling or amending an order relating to a financial instrument to which that information relates, where the order was placed before the person concerned came into possession of the insider information;
- **Market manipulation**, which is divided into price manipulation and the dissemination of false or misleading information:
  - **Price manipulation** consists of carrying out a transaction, placing an order or engaging in any other behaviour which (i) gives or is likely to give false or misleading signals as to the supply of, demand for or price of a financial instrument, or (ii) secures or is likely to secure the price of one or more financial instruments at an abnormal or artificial level in order to gain an advantage;
  - **Dissemination of misleading information** consists of spreading information likely to give false or misleading signals as to the supply of, demand for or price of a financial instrument, or which sets or is likely to set the price of one or more financial instruments at an abnormal or artificial level, including the spreading of rumours, where the person who disseminated such information knew or should have known that it was false or misleading.

These practices **undermine** investor confidence, **market transparency**, and the proper functioning of markets.

**Everyone** is therefore called upon to **act responsibly** and respect the principle of equal access to information among investors.

Entities that fail to comply with these rules are exposed to severe disciplinary, financial, civil and criminal **sanctions**.

## IN MORE DETAIL

### Insider dealing and market manipulation

What is insider information?

Information is considered insider information if it simultaneously meets the following criteria:

- **Non-public**: it has not been disclosed on the website of the concerned issuer or through a channel approved by the French Financial Market Authority (AMF);
- **Precise**: it relates to facts or a project that occurred or is reasonably likely to occur;
- **Linked to a listed company or a listed financial instrument**: it concerns a company or a financial asset listed on a stock exchange;
- **Price-sensitive**: it is likely to influence the price of the financial instrument or related assets if it were made public.

Using this information, disclosing it or recommending its use outside the normal scope of one's duties, whether for oneself or for others, constitutes insider dealing and may be subject to severe sanctions.

Market manipulation

Market manipulation are also detected through the systems set up to ensure the integrity of financial markets.

## OUR COMMITMENT

We **contribute to the integrity of financial markets** and protect our employees from any suspicion of insider trading. To this end, we implement **"information barriers"** that protect insider information. These provisions consist of registering the persons who access to such information in the insider information protection device.

The barriers also ensure that there is **no exchange** between those who access to insider information and those who don't, in particular through physical separation of persons carrying out sensitive activities or duties.

### Each employee must:

- Be attentive and take all necessary measures to avoid disclosing any insider information. This means respecting the information barriers in place;
- If they are on an insider list, comply with the related abstention obligations or, where applicable, declare their personal transactions in financial instruments;
- If they believe they have insider information, discuss it with their manager, who will inform the Compliance Officer;
- Promptly report any suspicious transactions that may constitute market abuse to the Compliance department;
- Preserve the confidential nature of any suspicious transaction declarations and, as such, not communicate with those suspected of having committed market abuse, proven or otherwise.

### Employees must not:

- Use (or try to use) insider information when acquiring or transferring instruments, contracts or financial or stock market securities for themselves or on behalf of Crédit Agricole S.A. or that of a third party;
- Communicate (or try to communicate) insider information to a third party outside the normal scope of their duties, to persons outside Crédit Agricole S.A., or to employees who are not authorised to access such information;
- Recommend taking positions on a security based on insider information to any third party.

## CASE STUDIES

**During my morning coffee break, I overhear a conversation. I learn that a publicly traded company is planning to acquire another publicly traded company. After checking, I understand that this information has not yet been made public. Can I carry out a financial transaction on these companies, even if the information has not been given to me directly and distinctly?**

No. The French Financial Market Authority (AMF) considers that an "insider" is any person who obtains insider information in the course of his or her duties, profession or by any other means. Using insider information to carry out a transaction for personal gain outside the normal scope of one's duties constitutes insider trading.

**I am on the metro with a colleague and would like to go over something that was brought up during a meeting. Can I talk about it right away?**

Wait until you're in a private place before discussing it: this will limit the risk of disclosing potential insider information that could be overheard by a malicious individual.

# FIGHT AGAINST TAX AVOIDANCE

*Our tax policy is based on transparency and accountability, ensuring that all our tax practices comply with the rules in force in the countries where we operate, both in France and abroad.*

## DEFINITION

We consider a **consistent and responsible tax approach** to be an essential part of our long-term strategy. We handle all tax matters relating to us with integrity and transparency.

Under the authority of our Executive Management, our internal procedure, which is regularly updated, requires prior authorisation for own account investments in countries listed in this procedure.

## OUR COMMITMENT

### No presence in non-cooperative territories

Crédit Agricole S.A. has no presence in the countries and territories included on the list of non-cooperative territories established by France.

### Responsible transactions

The Group does not offer its customers transactions that could be used for tax avoidance purposes.

### Employee training

All Crédit Agricole S.A. employees undertake to follow the tax regulation training programme to ensure their compliance.

### Automatic exchange of information (OECD and EU)

In accordance with the OECD international standard adopted by more than 100 countries, the Group entities:

- Identify tax account holders who are residents of countries that have signed an exchange of information;
- Each year, transmit the tax information of these customers to the local tax authorities, which forward it to the authorities of the countries concerned.

### Compliance with US FATCA regulations

Within the meaning of FATCA regulation, Crédit Agricole Group financial entities:

- Collect and document information on accounts held abroad by US taxpayers (US persons);
- Transmit this data to the US Internal Revenue Service (IRS).

### Each employee must:

- Respect the current laws and regulations in the countries and territories where they carry out their activities;
- Request authorisation from both Group Compliance department and Group Tax department before any investment by an entity in a non-cooperative foreign state or territory.

### Employees must not:

- Deliberately shield Crédit Agricole S.A. from its tax obligations;
- Participate in any transaction designed to avoid taxes.

## CASE STUDY

### What should be done if an investment transaction is proposed in a jurisdiction that is considered high-risk or non-cooperative in terms of taxation according to Group policy?

Gather all available information on this specific case and then submit it to both Group Compliance department and Tax department.

# FIGHT AGAINST MONEY LAUNDERING AND THE FINANCING OF TERRORISM

*We must all remain vigilant in order to prevent and detect any financial flows that could be linked to money laundering or the financing of terrorism.*

## DEFINITION

**Money laundering** involves **concealing the criminal origin of funds** in order to integrate them into the economy. This may include actions such as:

- Introducing illegal funds into the financial system;
- Concealing or moving these funds to obscure their origin;
- Reintroducing them through legitimate activities.

Money laundering involves reintroducing funds derived from serious crimes, punishable by law with imprisonment of more than one year, into the economy. It also includes participating in transactions to place, convert or integrate these funds, whether they come directly or indirectly from a crime or offence.

Unlike money laundering, which seeks to legitimise illegal funds, the **financing of terrorism** involves using funds, whether legal or illegal, to support terrorist activities. The term **“reverse money laundering”** is used when a legal source is diverted for criminal purposes.

## IN MORE DETAIL

Money laundering and the financing of terrorism have serious consequences, not only for the countries concerned but also globally:

- **Vulnerable countries:** countries with weak or ineffective regulations are particularly attractive to money launderers and terrorist financiers. They exploit the complexity of the global financial system, differences between national laws and the speed of money transfers to conceal their criminal activities;
- **Global impacts:** these practices threaten the stability of societies in general and hinder economic development. Criminals can infiltrate financial institutions, control certain economic sectors, corrupt their executives or governments and endanger democracy and the security of citizens.

These phenomena, which are unprecedented in scale, require vigilance and collective action to protect financial institutions, citizens and the fundamental principles of democracy.

## OUR COMMITMENT

We participate in the fight against money laundering and the financing of terrorism. As such, we monitor financial flows while respecting:

- The right to **privacy**;
- **Individual freedoms** and fundamental rights;
- The principles of **combating discrimination**.

**Everyone must participate**, at their own level, in ensuring constant vigilance. Any breach of obligation exposes executives, directors, and employees to civil, criminal, administrative and disciplinary **liability**. **Our reputation** is also at stake.

## Each employee must:

- Keep informed about these issues even if they are not directly exposed to them;
- If they are a manager, ensure that their employees are aware of these issues;
- Proactively apply anti-money laundering and anti-terrorism financing procedures;
- Pay particular attention to ensure they know as much as they can about their customers when they open an account and throughout their relations with the bank;
- Remain vigilant at all times and look for any unusual, atypical, complex transactions that have no apparent economic justification and could clearly be illegal;
- Ask customers to provide a reasoned explanation for their transactions;
- Refuse to carry out any transactions that are not economically justified or where the identity of the originators or beneficiaries remains unclear until the results of the investigation are available;
- Refer all suspicious transactions to the compliance department.

## Employees must not:

- Fail to strictly apply procedures for reasons that, for example, are commercial;
- Inform a customer or third party that they are under suspicion;
- Participate in or facilitate money laundering activities (introduction of illegal funds), conversion (removal of funds from their criminal source) or integration (reintroduction of funds through legitimate activities).

## CASE STUDIES

**I noticed that a transaction was carried out involving several jurisdictions. The originator, the bank where they have their account, the customer beneficiary and their bank are all domiciled in different countries. What can I do to remove any doubt as to the possibility of an opaque chain of payment?**

First of all, verify that the jurisdictions concerned are not considered high-risk according to the Group's policy and are not listed as non-cooperative jurisdictions from a tax point of view. Investigate the originators and beneficiaries to verify whether or not they really generate business in their geographical region (to detect the existence of a shell company).

In addition, take into account all information that links the addresses of the originator and the beneficiary with the locations of their banks. If necessary, ask the bank that has an account with Crédit Agricole S.A. and which is involved in the transaction. If, after gathering all of these elements, you still have doubts about the transaction, contact the Compliance department.

**I noticed a transaction destined for a country listed in the countries considered at risk. How do I analyse it?**

Gather all the information you have in the originator and beneficiary databases so that you can verify transaction consistency and check whether or not the sectors covered by both parties are authorised by the Group policy. If you cannot identify any consistency in the transaction, ask the bank that has an account with Crédit Agricole S.A. and which is involved in the transaction. If, after gathering all of these elements, you still have doubts about the transaction, contact the Compliance department.

**My prospect is a legal entity whose complex shareholding structure makes it difficult to identify the beneficial owner.**

In this situation:

- Trace the ownership chain back until you identify the natural person who holds 25% or more of the entity's shares or voting rights. This analysis can be difficult in the case of complex legal structures such as trusts or fiduciary arrangements;
- Obtain the necessary supporting documentation to confirm this information;
- Verify the country of residence of the beneficial owner and determine whether it is linked to a high-risk or non-cooperative jurisdiction;
- Also check whether the beneficial owner is, or is not, a politically exposed person (PEP).

# COMPLIANCE WITH INTERNATIONAL SANCTIONS REGULATIONS

We must all be familiar with, understand, and apply the international sanctions compliance programme.

## DEFINITION

International sanctions are measures taken by one or more states against:

- Individuals and/or legal entities (e.g. asset freezes);
- Countries or governments (e.g. embargoes).

They are intended to combat, in particular:

- Terrorism,
- Nuclear proliferation,
- Cyberattacks,
- Organised crime,
- Human rights violations.

They are issued, administered or enforced by:

- The UN Security Council,
- The European Union,
- France,
- The United States,
- And competent local authorities.

For example, since Russia's invasion of Ukraine in 2022, the European Union and the United States have imposed massive sanctions against Russia.

## OUR COMMITMENT

We ensure **strict compliance with international sanctions**, even when they are complex or apply beyond the borders of the countries where the Group operates.

To guarantee this compliance, we have strengthened our **compliance programme** to ensure that all regulatory obligations are met. This programme applies to all employees, in all entities and for all activities, including non-banking activities.

Crédit Agricole has a zero-tolerance policy towards any violation of international sanctions.

### Employees must not:

- Participate in a financial transaction of unexplained complexity;
- Remove or conceal any information for the purposes of covering up evidence of a transaction with countries or persons that are subject to international sanctions;
- Modify tools or IT processes for the purposes of removing information that is useful for detecting the risk of international sanctions;
- Advise a customer and/or participate in a financial arrangement aimed at circumventing international sanctions;
- Remit funds to a customer subject to French or European asset freezing measures.

## CASE STUDY

### I have dual Franco-American nationality and I am an employee of Crédit Agricole S.A. To which regulations should I refer?

You are considered a "U.S. Person" affiliated to the Group. Therefore, in all cases, you must:

- Inform the human resources department of your status;
- Carefully read the technical note on this subject. This is to ensure that you comply with the legal provisions of the Office of Foreign Assets Control (OFAC) that apply to you;
- Comply with international sanctions imposed by the United States in the performance of your duties.

### Each employee must:

- Become well acquainted, understand and comply with the group's internal policies and procedures;
- Complete the annual training session which is mandatory for all employees;
- Know how to identify high-risk situations and practices in order to secure commercial operations;
- Remain attentive to, identify and promptly report to the compliance officer any violation or attempted violation of international sanctions, as well as any action taken, directly or indirectly, to circumvent them;
- Keep customer knowledge files up to date and complete;
- Monitor the compliance of operations with international sanctions;
- If in doubt, contact their Compliance Officer.

# ACTING WITH INTEGRITY: ANTI-CORRUPTION CODE OF CONDUCT



# ANTI-CORRUPTION CODE OF CONDUCT

## MESSAGE FROM THE CHIEF EXECUTIVE OFFICER

Our Group's historical values and our Raison d'Être require everyone to act in an irreproachable manner.

With this in mind, the Anti-Corruption Code of Conduct was drawn up in order to bring together the guidelines for good conduct in terms of the fight against corruption and influence peddling, and to underscore our zero tolerance policy with regard to any infringement of the rules in this Code. The Group has also obtained ISO 37001 certification for its anti-corruption management system.

This Code summarises the situations we may face, as identified in the corruption risk maps for each Group entity. It provides the information needed to act in accordance with applicable laws and regulations, in particular the Sapin II law, and in line with the Group's values and principles.

This Code should be read in conjunction with the Group's Code of Ethics and must be complied with. It concerns us all, regardless of our position or country of operation. It also serves as a reference for our partners (suppliers, customers etc.). Everyone plays a role in the development and protection of our Group.

I am counting on you.

**Olivier Gavalda**

## DETAILS ON THE APPLICATION OF THE ANTI-CORRUPTION SECTION OF THE CODE OF CONDUCT

The general rules regarding how to use the Code of Conduct apply to the anti-corruption section and, in particular, the "right to file a report".

## WHO DO THE ANTICORRUPTION RULES APPLY TO?

The Anti-Corruption Code of Conduct applies to everyone in the Group, be they Directors, executives or employees (whether permanent and fixed-term employees, trainees, people on work-study and interns) regardless of their position and duties within the Crédit Agricole Group and the Group's temporary external workers (hereafter, "Employees"). This Code applies across the Group and its subsidiaries around the world.

## WHAT ARE THE EMPLOYEES' OBLIGATIONS?

The Anti-Corruption Code of Conduct addresses situations identified in the corruption risk maps of each Group entity. It is incorporated into the Rules of Procedure and its application is mandatory. Everyone must be acquainted with, and act in accordance with the principles and rules of the Code, in performing their duties.

We are all responsible for our actions and therefore have a duty of constant vigilance.

Anyone who notices or suspects an act or behaviour that is unethical in terms of the Group's values or of regulations, or who is put under pressure to commit an act that is unethical, in terms of the Group's values or illegal, must immediately inform their manager. The Group's whistleblowing procedure enables everybody to report an anomaly to the Compliance Officer or, in certain cases, to the regulatory authorities.

## WHAT ARE THE CONSEQUENCES OF INFRINGING THE CODE?

The rules of conduct set out in this Anti-Corruption Code are related to Crédit Agricole S.A.'s Rules of Procedure. In accordance with the latter, sanctions may be imposed on anyone who infringes these principles and legal obligations.

## REMEMBER

As an employee, any act of corruption is punishable by disciplinary sanctions, as set out in the Rules of Procedure, but also administrative and criminal penalties, which in France can include up to five years' imprisonment and a fine of €500,000 for private-sector corruption, and up to ten years' imprisonment and a fine of €1,000,000 for public-sector corruption.

As a legal entity, Crédit Agricole S.A. may not only incur fines, but also be subject to market exclusions or withdrawals of authorisations and can be prohibited from raising financing which would, moreover, damage its reputation.

For further information: the complete system and procedures implemented by the Group to fight against corruption are available in your Intranet account.

# THE FIGHT AGAINST CORRUPTION

We have a zero-tolerance policy towards all forms of corruption. Everyone within the Crédit Agricole Group must be vigilant in order to prevent and detect acts of corruption.

## DEFINITION

Corruption is when a person in a public or private position asks for, offers or accepts a benefit (gift, offer, promise) in order to influence an action or omission related to their duties, either directly or indirectly.

Corruption **distorts free competition and hinders economic development**. It can have **serious** financial, commercial and legal **consequences** for the Group and damage our reputation.

### The two types of corruption:

- **Active corruption** (the corrupting person) consists of giving or offering a benefit (promise, gift, present etc.) to a public or private individual to perform or refrain from performing an action within the scope of their duties;
- **Passive corruption** (the corrupted person) involves a public or private individual who accepts or solicits a benefit in order to:
  - Perform or refrain from performing an action related to their duties,
  - Benefit themselves or someone else.

Under french law, corruption (active or passive) in a public context can result in:

- Up to **ten years' imprisonment**;
- Significant fines and other penalties for the individuals and entities involved.

Corruption, whether public or private, is a **serious offence** that undermines the integrity of institutions, businesses and economic relations.

## OUR COMMITMENT

We have a **zero-tolerance** policy with regard to corruption, including **facilitation payments** (see specific fact sheet).

No employee may engage in bribery in any form or for any reason. Any employee involved in an act of corruption is liable to **disciplinary sanctions** and, where applicable, **criminal prosecution**.

### Each employee must:

- In the event of pressure or solicitation from third parties, notify their manager and the Compliance department;
- Report internally any gifts and benefits offered or received using the dedicated reporting tool on the Crédit Agricole S.A. intranet site;
- For gifts and benefits offered or received with a value equal to or greater than €150, and in the specific cases mentioned in the procedure concerning gifts and invitations (e.g. gifts and invitations received at home, those received during a tender period etc.), The employee must obtain their manager's approval;
- Comply with existing procedures for the validation of expenses incurred;
- Be constantly on the alert and monitor all of their relationships with intermediaries and suppliers;
- Respect the recruitment procedures defined by the Group;
- Ensure that all payments are substantiated, documented and properly authorised.

### Employees must not:

- Offer, promise or agree to giving a benefit (financial or otherwise) to a third party, for the purposes of inducing them to improperly perform or refrain from performing an act;
- Solicit, receive or accept any benefits (financial or otherwise) in exchange for performing a task, give consent under a commercial agreement or carry out any other action in the course of their duties or activities;
- Favour a third party in calls for tenders;
- Offer or accept gifts and benefits other than those that have been authorised;
- Accept an offer by a third party to finance a trip for you, either partially or in full, even if it is for business reasons.

## CASE STUDIES

### A supplier is offering me a weekend by the sea in exchange for a shorter payment term. Can I accept?

No, this constitutes attempted bribery. It is prohibited to accept gifts or benefits related to your job. Immediately inform:

- Your manager;
- The Compliance department;
- The Purchasing department.

### A supplier offers to finance part of a trip to a trade show abroad. What should I do?

Politely decline the offer. To ensure the independence of the Group and its employees, no third party may partially or fully cover a trip, even in a professional context.

### A superior asks me to suggest that a service provider hire a member of their family. How should I respond?

Politely decline this request and inform your line manager. This request does not comply with the Group's ethical rules.

# THE FIGHT AGAINST INFLUENCE PEDDLING AND INTERACTION WITH PUBLIC OFFICIALS

*We are particularly vigilant in our interactions, whether direct or indirect, with public officials and ensure that we comply with applicable regulations.*

## DEFINITION

For a person exercising a public function, performing a public service mission or holding public office, influence peddling consists of:

- Soliciting or accepting benefits (offers, promises, gifts, presents etc.) For themselves or for another person;
- Using their influence, real or supposed, in order to obtain a favourable decision from a public authority or administration.

This may concern the awarding of distinctions, jobs, contracts or any other benefit. Influence peddling involves three parties:

- The beneficiary who provides benefits or gifts;
- The intermediary who uses the influence they have because of their position;
- The target who holds the decision-making power (public authority or administration, magistrate, expert etc.).

Criminal law distinguishes between **active** influence peddling, concerning the beneficiary, and **passive** influence peddling, concerning the intermediary. Each of the two offences is treated separately and punished in the same way, carrying a **prison sentence of up to ten years** (in France).

## OUR COMMITMENT

All employees must adopt **business conduct that is in accordance** with French anti-corruption regulations and which is applicable in the countries where we operate.

Offering **gifts, benefits or public relations activities to public officials** is strictly prohibited. Certain activities involving public officials require **particular vigilance**.

### Each employee must:

- In the event of pressure or solicitation from a public official, notify their manager and the Compliance department;
- Be constantly on the alert and regularly monitor all operations involving public officials;
- Ensure that all payments and expenses involving public officials are properly authorised, accounted for and documented.

### Employees must not:

- Offer, promise or consent to giving a benefit (financial or otherwise) to a public official, for the purposes of inducing them to improperly perform or refrain from performing an act;
- Favour a relative of a public official within the context of a call for tenders or a recruitment process;
- Give cash to public officials.

## CASE STUDIES

**To open a subsidiary in a foreign country, we have to obtain a banking licence. An employee of a government department in this country offered to exert influence on the person in charge of granting licences and asked me to pay part of the amount required into a bank account. What should I do?**

Refuse and notify your manager as soon as possible. Seek advice from the Compliance Officer to avoid becoming involved in a corrupt practice.

**I am in charge of a sales department within the Group. A municipality seeking funding is seeking information about the local banks, including our Group. One of my acquaintances who is the deputy mayor of the municipality, is offering to use his influence to discretely obtain a copy of the competing offers from the mayor. In exchange, they want an expensive gift.**

Refuse the request, which constitutes an active act of influence peddling, and speak with your manager.

**I am a manager in charge of a marketing or IT project within the Group. A consultant offers to give me an all-expenses-paid trip in exchange for being selected at the end of the tender process for consulting services related to this project.**

Decline this offer and inform your manager and the Compliance department as soon as possible.

# THE FIGHT AGAINST FACILITATION PAYMENTS

*We do not tolerate facilitation payments and are vigilant in all interactions with members of public administrations, in compliance with applicable laws and conventions.*

## DEFINITION

Facilitation payments are generally small sums of money that are paid directly or indirectly to public officials in order to carry out or speed up formal administrative procedures. These payments are notably made within the context of processing visa applications, issuing authorisations, permits and licences and for customs procedures.

**Facilitation payments are considered corrupt acts.** These are prohibited by the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions of 17 December 1997 and the Sapin II law of 9 December 2016.

## OUR COMMITMENT

Facilitation payments are **strictly forbidden**. They can only be considered in exceptional situations, for example if the safety or physical integrity of an employee is threatened. In this case:

- Immediately inform the compliance officer;
- Ensure that the payment is correctly identified and recorded in the company's accounting books and documents.

### Each employee must:

- Consult their manager or the Compliance Officer if they receive a request for a facilitation payment from a public official;
- Alert their manager or the compliance officer if, in the context of an exceptional situation, they have made a transaction that may be considered a facilitation payment;
- Keep all documents relating to any transaction that could be considered a facilitation payment.

### Employees must not:

- Offer, promise or give a benefit (financial or otherwise) to a public official within the context of performing a routine administrative task;
- Mediate on their own when dealing with a facilitation payment request.

## CASE STUDIES

### **A civil servant offers to expedite the issuance of a building permit in exchange for a gratuity. Should I accept?**

No. This sum does not represent a legitimate fee. Accepting such a payment may be considered an act of corruption. Immediately inform your manager or the Compliance Officer.

### **When applying for a visa for business travel, an embassy official offers to expedite the process in exchange for tickets to a show. What should I do?**

Politely decline. Offering such a benefit could be perceived as an act of corruption. Report this situation to your manager or the Compliance Officer immediately.

# PREVENTION AND MANAGEMENT OF CONFLICTS OF INTEREST

We prevent and manage conflicts of interest transparently to ensure that business decisions are made in the best interests of our customers and the Group.

## DEFINITION

A conflict of interest arises when the personal interests of an employee conflict with those of:

- A customer;
- An external third party;
- Or Crédit Agricole S.A.

In other words, it is a situation where the personal interests of an executive, employee or any member of the company may influence their judgement or decisions in the performance of their professional duties. **Types and examples of conflicts of interest:**

- **Personal:** family relationships that may influence a decision;
- **Professional:** business relationships where personal preferences come into play;
- **Financial:** personal loans or conflicting investments;
- **Political:** political pressures that may influence company decisions.

## OUR COMMITMENT

Crédit Agricole S.A. is actively committed to **preventing conflicts of interest**. Such situations may:

- Be considered acts of corruption or influence peddling;
- Expose the company and its employees to accusations of bias or dishonesty;
- Damage the reputation of the group and its employees.

### Each employee must:

- Respect the prevention principles and measures regarding gifts and benefits, public relations activities and extra-professional activities, to maintain independence of judgement and avoid conflicts of interest;
- Report to the Compliance Officer any privately held administrative, management or executive positions\*, whether remunerated or not, within any organisation, whether for profit or not, as well as any elected positions. The Compliance Officer may contact their manager in the event of a detected conflict of interest risk;
- Comply with the restrictions on personal transactions that apply to them;
- Declare their personal transactions in financial instruments when concerned;
- Inform their manager of any personal or family ties they may have with a third party in relation to their company;
- Inform their Compliance Officer of any potential direct or indirect conflict of interest and abstain from participating in debates or decision-making on the subjects concerned.

\* Exclusions are made for positions held in family-owned real estate investment companies or in organisations whose purpose is related to the religious, philosophical or sexual orientations or health status of their employees, unless the employee considers themselves to be in a conflict of interest and wishes to report it to the Compliance Officer.

### Employees must not:

- Make decisions if their discretion or decisions could be influenced or altered by personal considerations or by pressures imposed by a third party;
- Conceal information about any conflict of interest or any situation that could create a conflict of interest;
- Accept an invitation worth more than €150 without obtaining authorisation from their manager and the Compliance Officer;
- Nominate a relative for a position without following the recruitment process based on objective criteria;
- Disclose confidential information to family members or relatives;
- Carry out transactions in financial instruments on their own behalf based on confidential or insider information obtained in the course of their professional activities;
- Acquire positions of interest in a competitor, customer or supplier.

## CASE STUDIES

**My manager is asking me to choose between two suppliers, but one of the directors is a childhood friend. What should I do?**

Inform your manager of this relationship in writing and withdraw from the selection process to avoid any conflict of interest.

**My brother is a service provider in a training organisation, and his offers meet our needs. Can I use them?**

Report this situation in writing to your manager. They will need to ensure that you do not participate in the provider selection process to avoid any conflict of interest.

**I am an employee of Crédit Agricole S.A. and a director of a company in which Crédit Agricole S.A. is a shareholder. What should I do?**

Report the situation to the Compliance Officer, and do not participate in any discussions and decision-making on matters that could create a conflict of interest.

# REGULATION OF GIFTS AND INVITATIONS

We are vigilant when giving or receiving gifts or invitations to ensure that this does not compromise our impartiality and complies with our internal procedures in this area.

## DEFINITION

**Corporate gifts** are those that are offered within the context of business relations. Some, such as trips or electronic equipment, can be of high value. To avoid any risk of **corruption** or **conflict of interest**, their acceptance is strictly regulated.

“Invitations” include all forms of social relations or invitations offered or received, in particular:

- Meals, accommodation, seminars, conventions or conferences;
- Sports, cultural or social events;
- Business trips or press trips.

## OUR COMMITMENT

### Value limit

Gifts or invitations accepted or offered independently must have a maximum value of **€150**. If their value exceeds this amount, your manager’s approval is required before accepting them. If in doubt, the manager may consult the Compliance Officer.

### Public relations

The Cr dit Agricole Group authorises public relations activities (e.g. courtesy or welcome events) when they have a **clear strategic and/or commercial justification**. These activities must be carried out in a professional setting and attended by the employee who issued the invitation.

### Each employee must:

- Refuse any gift or invitation that could lead to a conflict of interest;
- If they are a manager, make sure that their staff are aware of the rules regarding gifts and invitations, public relations activities and business trips;
- Internally report all gifts and invitations offered or received using the dedicated tool. For gifts and invitations worth more than €150, or for gifts and invitations sent directly to your home address, or in other specific cases mentioned in the “Gifts and invitations” procedure, hierarchical authorisation and a compliance notice are also required;
- Be transparent with their manager to avoid any suspicion;
- Refuse invitations to high-value events;
- If they accept an invitation, pay the associated travel and accommodation expenses.

### Employees must not:

- Accept gifts or invitations that could compromise their independence, impartiality or integrity, even unintentionally;
- Solicit gifts from current or potential business partners of the Group;
- Accept or give any gifts or benefits worth more than the authorised fixed amount without the agreement of their manager or receive these at their personal address, regardless of the amount;
- Solicit any form of gift or benefit for their own account or for that of a third party;
- Receive any form of compensation from a counterparty, an intermediary, a supplier or a customer, either directly or indirectly;
- Give or receive gifts in cash or equivalent means (gift cards or vouchers) or in any other form (bank cheques or transfers), except in the specific case of internal sales challenges;

- Offer or accept any public relations invitations that could damage the Group’s image.

In the specific case of sales challenges, the receipt of gift vouchers may be authorised if:

- It falls within a framework approved by the company;
- The gift voucher is of a reasonable amount;
- The employee concerned is not in a conflict of interest with the donating company.

## CASE STUDIES

### I have been invited by one of our suppliers to a trade show abroad. How should I react?

Travel, even of a strictly professional nature and paid for by a third-party company, is forbidden. Decline the offer politely and explain clearly the reasons why. It is your entity that takes care of all your business expenses (transport, accommodation etc.). If you are accompanied by a family member, you are responsible for paying their expenses.

### Can I offer a customer tickets to a show without attending myself?

No, you must attend as a representative of your business activity. The same goes for invitations received from suppliers.

### I received some small gifts sent to my personal address from one of my business contacts. I am not very comfortable with this because my manager does not know. What should I do?

The right thing to do is to tell your manager and seek advice from the Compliance Officer. They will tell you the most appropriate way to handle the situation and avoid becoming involved in any corrupt dealings.

# REGULATION OF LOBBYING ACTIVITIES AND POLITICAL PARTY FUNDING

*We conduct our lobbying activities in a responsible and transparent manner. We never support political parties in any way.*

## DEFINITION

Lobbying involves communicating directly or indirectly with public officials to influence their decisions.

It enables legislators to understand how laws are applied and identify areas for improvement. It also helps public decision-makers to better understand the expectations of civil society.

This activity is **strictly regulated** and subject to specific obligations to ensure transparency and ethics in these exchanges.

Furthermore, the **funding of political parties** by legal entities (companies, foundations etc.) is **strictly prohibited**.

## OUR COMMITMENT

With the support of experts from various Group entities, Crédit Agricole contributes positively to international, European and national public debates on political and technical issues.

The objective is to:

- Provide a reasoned analysis of the consequences of public decisions;
- Defend the interests of customers, society, the financing of the economy and the Group;
- Ensure fair competition in the sectors concerned.

In addition to fully respecting **the ban on any financial or other support for political parties**, including in countries where this practice is permitted, the group insists that all information pertaining to the political convictions and commitments of its employees remain personal, so that its reputation is never implicated or jeopardised. These activities must be carried out outside working time and outside the Group.

## Employees must not:

- Use corruption and any dishonest or abusive practices;
- Use Group resources or funds to engage it in fund-raising or political support activities;
- Offer or accept gifts and benefits prohibited by the Group's policy on the subject.

## CASE STUDIES

### What should I do if a public decision-maker contacts me or if I wish to contact a public decision-maker?

Inform the Public Affairs department, which will be able to assist you in your discussions with the public decision-maker, if necessary.

### What should I do if one of our customers asks me to support his political campaign in the local elections?

Refuse this request for support in order to ensure the political neutrality of the Group and immediately inform your manager or your Compliance Officer.

### I work in a country where it is customary for large foreign companies to finance the main political parties. Can Crédit Agricole Group make such a contribution?

No. Even if this form of monetary support is accepted by law and local customs, it could make the Group liable. Inform your manager and the Compliance Officer immediately.

## Each employee must:

- Be transparent about their lobbying activities, inside and outside the Group;
- Report any contact with a public decision-maker to the Public Affairs department;
- Declare the positions they hold in various trade associations;
- Base their arguments on reliable information that has been analysed and audited at the internal level;
- Highlight the consequences for the different stakeholders;
- Record all organisations on behalf of which they lobby in the register of lobbyists, if one exists and if applicable;
- Update the list of contacts with public decision makers, so that they can draft the annual report of their activities, as required by regulations;
- Declare their elected public offices to their manager and Compliance Officer;
- Make sure that they do not commit the group with their political opinions and actions;
- Refuse all requests for political support in any form whatsoever that could make the Group liable.

# REGULATION OF PATRONAGE AND AID

We support organisations working for the public good in accordance with our values and ethical principles.

## DEFINITION

**Patronage** allows a company to make a donation in the form of financial or material assistance (in kind, such as the loan of premises or the donation of equipment) or even skills to a public interest organisation eligible for sponsorship.

## OUR COMMITMENT

Crédit Agricole S.A. chooses to support associations carrying out projects that are consistent with its Societal Project or, more broadly, that benefit the local community or respond to urgent needs (e.g. natural disasters).

## Principles of action

Support must comply with the Group's **Code of Ethics**. We give priority to supporting projects in countries where Group entities are present.

The areas concerned include:

- Inclusion (professional integration, education and support for people in vulnerable situations);
- Health;
- The environment;
- University chairs;
- Emergency support.

## Ethics of contributions

Charitable contributions should never be used to disguise an illegal benefit or to influence or give the appearance of influencing decision-making.

### Each employee must:

- Consult the patronage team of the Group Communication department for any project to support an organisation or charity. Patronage projects must always be selected with care and take into account the experience of the selected organisation, its representatives and its reputation;
- Support charitable organisations whose accounts are published and regularly audited;
- Identify a project to support, along with the financial and human resources necessary for its implementation;
- Ensure that all patronage contracts drawn up with the organisations concerned incorporate compliance clauses and make sure they are in a position to verify how these funds are used;
- Ensure that all aid related to an association is properly authorised, accounted for and documented.

### Employees must not:

- Make donations to individuals or to for-profit organisations;
- Make donations that indirectly benefit, or are controlled by politicians, public officials or their relatives;
- Support organisations that could have a negative impact on the company's reputation;
- Make cash payments.

## CASE STUDIES

### A public official asks the Group to finance an association run by his wife. What should I do?

Immediately inform your manager or the Compliance Officer. This situation must be analysed to ensure that it complies with Group rules and to determine how to proceed.

### I discover that a charity funded by the Group is using funds for purposes other than those intended, such as printing flyers at a printing company owned by the Treasurer's sister. What should I do?

Report this situation immediately to your manager or Compliance Officer. An assessment must be carried out to decide whether the funding should be maintained, taking into account:

- The risk of conflict of interest;
- The inappropriate use of funds provided by the Group.

# SPONSORSHIP MANAGEMENT

*We are vigilant in ensuring that our sponsorship activities are conducted with complete transparency and integrity, in accordance with our internal rules and procedures.*

## DEFINITION

**Sponsorship** is a form of marketing whereby the company assumes all or part of the expenses of a project or programme, in exchange for visibility in communications media or events.

The Company benefits from the fact that its logos and brands are displayed by the project or programme, and that it receives a specific mention specifying that it has contributed to the financing. This may involve non-profit organisations and commercial entities.

## OUR COMMITMENT

Sponsorship is a key element of the Crédit Agricole Group's marketing and communications strategy. It helps promote the Group's image through partnerships, particularly in areas such as football and judo.

All sponsorship activities must comply with the Group's **internal principles and rules**. Sponsorship must never:

- Offer an undue advantage;
- Inappropriately influence a decision-maker;
- Give the impression of seeking to unduly influence a decision.

### Each employee must:

- Carefully select the sponsored organisation, in the light of its experience and reputation;
- Prefer sponsored organisations whose accounts are published and audited;
- Submit a written request to Executive Management. When sponsored events or activities are controlled by politicians, public officials or their relatives, this information must be indicated in their request;
- Draw up a contract including compliance clauses with the sponsored organisation;
- Inform all stakeholders of the sponsorship;
- Transfer funds in several instalments and ensure that each payment is properly used;
- Obtain and keep receipts for all expenses incurred and revenues collected within the context of sponsorships and record them in the books in accordance with accounting rules.

### Employees must not:

- Sponsor an organisation suggested by a public official;
- Sponsor an organisation that indirectly benefits, or is controlled by, politicians, public officials or their relatives;
- Sponsor an organisation that is related to projects in which the Crédit Agricole group is involved for commercial purposes.

## CASE STUDIES

### **A treasurer offers sponsorship in exchange for a contract worth several million euros. What should I do?**

Decline this offer immediately, as it constitutes an act of corruption. Inform your manager or the Compliance Officer immediately.

### **A sponsored sports club is involved in a scandal. What should I do?**

Report this situation immediately to your manager or the Compliance Officer. This will allow us to assess the measures to be taken, as this situation could affect the reputation of the Group and its employees.

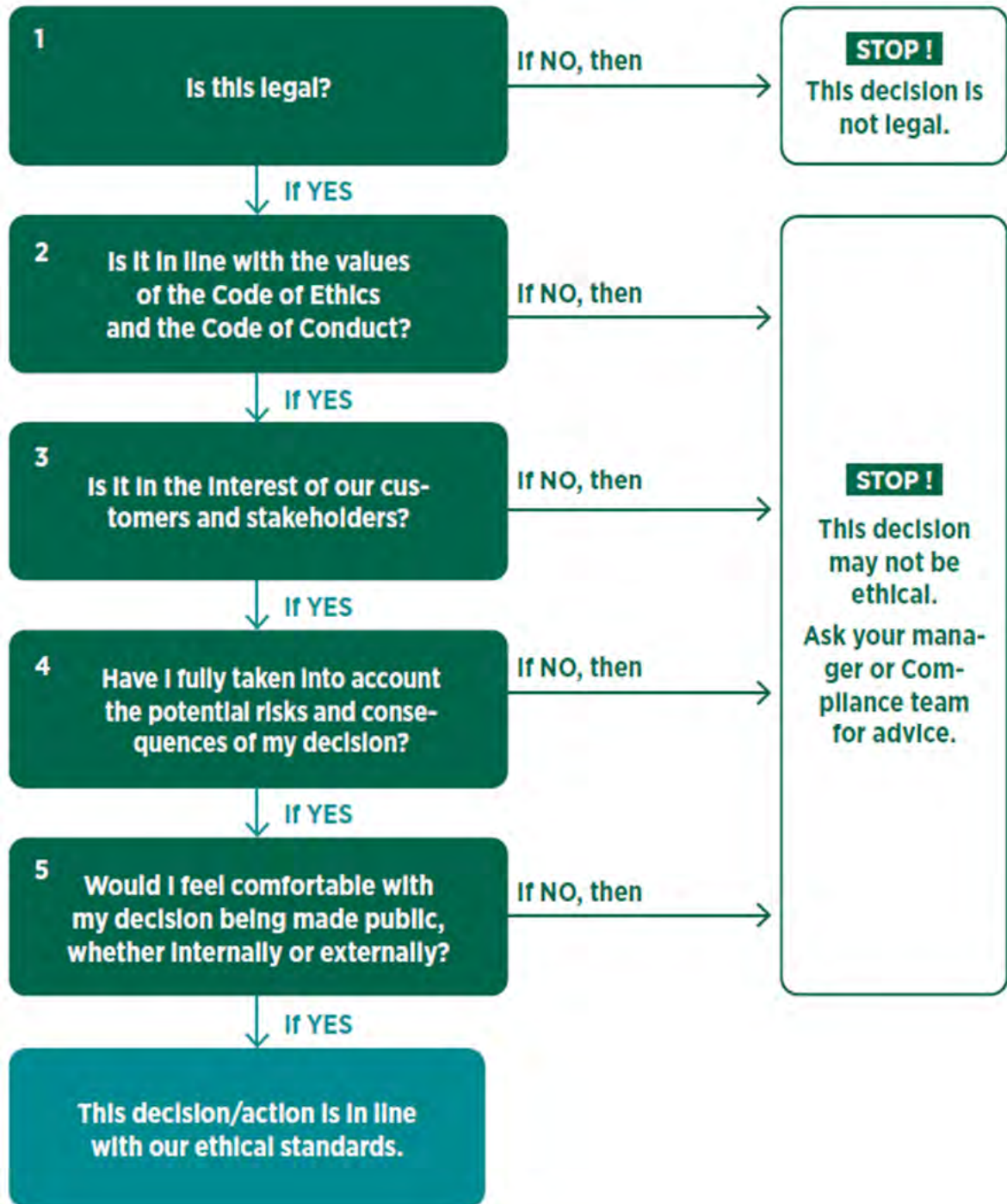
# USING THIS CODE



# ASK YOURSELF THE RIGHT QUESTIONS

This Code of Conduct cannot be exhaustive and answer every question. That is why, in every situation or for every decision made, you should use your sense of ethics.

## FIVE QUESTIONS TO ASK TO ENSURE ETHICAL BEHAVIOUR



If the answer to any of these questions is “no”, or if in doubt, you must discuss it with someone before taking action. You may consult your manager, or contact the Compliance, Human Resources, Societal Commitment, and Legal Affairs departments, or any other department qualified to deal with the issue at hand and should keep a record of all problems encountered.

# WHISTLEBLOWING

If you encounter a situation that violates our rules of ethical conduct, the company encourages you to report it. As a whistleblower, you are protected and confidentiality is guaranteed.

## What is a whistleblower?

A “whistleblower” is **any individual who reports or discloses, without direct financial compensation and in good faith, information concerning a violation of laws, regulations, our ethical standards, or a serious violation of the public interest.**

The person filing such a report may choose to be accompanied by **facilitators** in the reporting process. Facilitators may be individuals (e.g. a relative of the whistleblower, a colleague) or legal entities (e.g. an association, a union).

## As a whistleblower, how am I protected?

As a whistleblower, the company and the law **protect you against any form of retaliation**. This means that you may not, in particular, be subject to disciplinary sanctions, be dismissed or be subject to direct or indirect discriminatory measures because of your report.

You can choose to report **anonymously** using the secure online platform. Whether you choose to report anonymously or not, your identity and that of the persons involved in the reported acts will be kept **strictly confidential**.

## Who can file a report?

- Company employees;
- Job applicants (when the information was obtained in the context of their application);
- Former employees (when the information was obtained in the context of their working relationship);
- Shareholders, partners and holders of voting rights at the General Meeting;
- Members of the administrative, management or supervisory body;
- External and occasional partners, as well as members of their administrative, management or supervisory bodies;
- Employees of co-contractors and subcontractors.

## What types of incidents can be reported?

To be admissible, a report must concern **information obtained in the course of professional activities** and relate to:

- a crime or offence;
- a violation of laws or regulations;
- a violation of rules of ethical conduct;
- serious damage to the environment;
- a serious violation of human rights or health and safety;
- a risk to business integrity.

When the information reported has not been obtained in the course of professional activities, you must have personal knowledge of it.

For example, you can report attempted corruption, harassment or a conflict of interest, supported by factual and verifiable data.

An inadmissible report is, for example:

- a report to escalate a disagreement with my manager about taking time off work;
- a report for the purpose of monetising information;
- a report based on information that one knows to be false for the purpose of harming my colleague.

The person filing a report disclosing facts or information that is prohibited from being disclosed (e.g. national defence secrets, medical secrets, secrets of judicial investigations or inquiries etc.) does not benefit from the protection provided by law.

## How do I escalate a report?

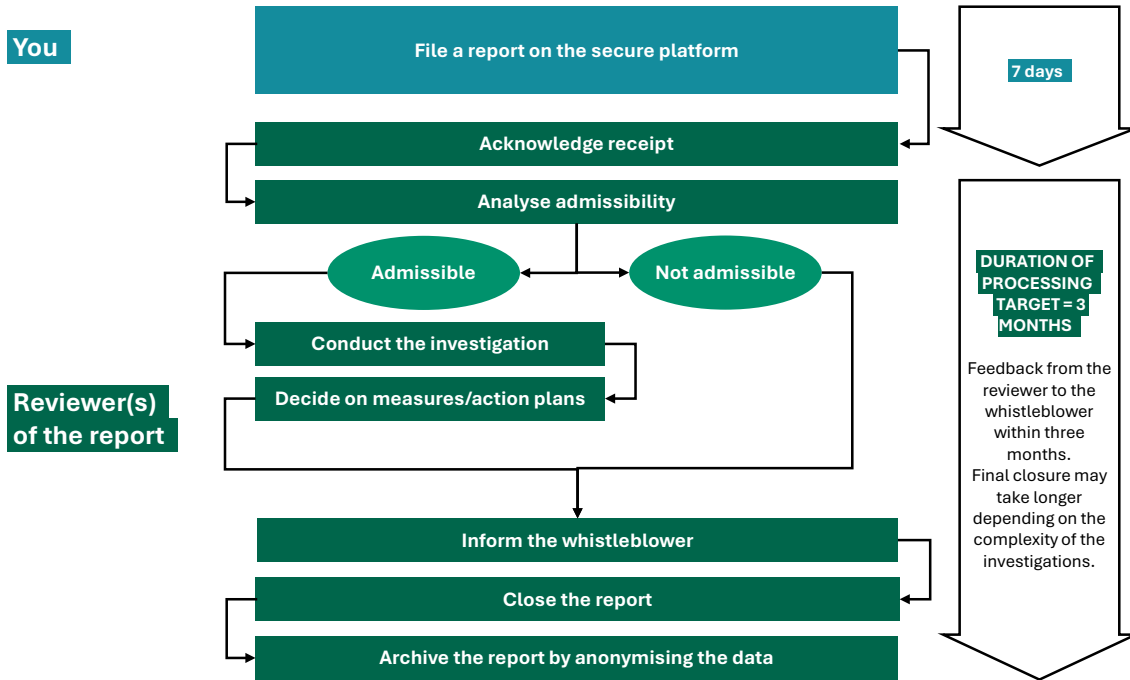
Talk or write to:	File an online report on the secure platform
<ul style="list-style-type: none"><li>• Your direct or indirect manager;</li><li>• The compliance department;</li><li>• The human resources department.</li></ul>	<ul style="list-style-type: none"><li>• Accessible 24 hours a day, 7 days a week;</li><li>• Available in several languages including french and english.</li><li>• <a href="https://www.Bkms-system.Com/groupe-credit-agricole/alerte-ethiques">https://www.Bkms-system.Com/groupe-credit-agricole/alerte-ethiques</a></li></ul>

## How is my report handled?

Crédit Agricole S.A. is committed to handling reports within a reasonable time frame (three months) **impartially** and in complete **confidentiality**.

The reviewers responsible for handling reports all sign a confidentiality agreement. Whether you choose to remain anonymous or not, you can communicate with the reviewers in complete confidentiality via the tool’s encrypted and secure internal “dialogue box”.

Reports deemed “sensitive” are reviewed by the Whistleblowing Management Committee. This Committee is composed of the Internal Whistleblowing Representative (Head of Compliance), reviewers and business experts who meet to agree on the follow-up to be given to reports and to develop an action and remediation plan. All members of the committee sign a confidentiality agreement.



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AND FOR SOCIETY**

