

DECLARATION ON MODERN SLAVERY AND HUMAN TRAFFICKING

This declaration is published in compliance with Section 54 of the UK Modern Slavery Act 2015, which was enacted to combat slavery and human trafficking.

It describes the measures that Crédit Agricole S.A. implemented in 2018 to prevent the risks of modern slavery and human trafficking in its business activities and relationships with its suppliers.

This declaration was approved by Crédit Agricole S.A.'s Board of Directors at its meeting of 21 May 2019.

OUR GROUP, OUR BUSINESS ACTIVITIES AND OUR SUPPLY CHAIN

The Crédit Agricole Group has banking and insurance activities in 47 countries, 51 million clients across the world, 10.1 million members and almost 900,000 individual shareholders. The Group has 141,000 employees in France and abroad. Our compliance with social and environmental commitments is an integral part of the investment and business transformation projects of our clients, which include multi-national groups, SMEs, farmers, tradespeople, NGOs, communities and consumers.

In the course of its business activities, the Crédit Agricole Group purchases products and services from suppliers, who themselves may use subcontractors. In 2018, our purchases totalled €6.9 billion, most of which were for products and services in the following categories: real estate, IT, intellectual services, general goods and services, and communication.

OUR COMMITMENTS

Our main commitments have their roots in the fundamental principles we adhere to, which are:

- The United Nations' Universal Declaration of Human Rights, of 1948
- The 10 principles of the UN Global Compact, since 2003
- The Equator Principles, since 2003
- The Principles for Responsible Investment, since 2006
- The United Nations Sustainable Development Goals, since 2015
- The UN Guiding Principles on Business and Human Rights
- The OECD Guidelines for Multinational Enterprises
- The International Labour Organisation conventions and the performance standards of Société Financière Internationale (SFI).

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

- **CSR sector financing policies**, which set forth the social and environmental criteria that apply to lending and investment activities and which include respect for human rights. For each sector covered, a reference framework is determined and analytical criteria are defined for evaluating transactions and for detecting projects and transactions in which the Group does not wish to be involved.

- The **Diversity Charter**, which since 2008 has underpinned the Crédit Agricole Group's efforts to promote diversity in the workplace and prevent all forms of discrimination.

- The **Human Rights Charter**, adopted in 2009, which commits all Crédit Agricole S.A. entities to ensure that they and their suppliers comply with the principles and fundamental rights of the Universal Declaration of Human Rights and of the conventions of the International Labour Organisation, which deal specifically with the issues of forced labour, child labour, discrimination and freedom of association.

- The **Responsible Purchasing Policy** and the **Responsible Purchasing Charter**, which were revised in 2017 and extended to the entire Crédit Agricole Group in 2018. This policy and charter require

reciprocal commitments from the Crédit Agricole Group and its suppliers that are based on the fundamental principles of the UN Global Compact.

- The **Crédit Agricole Group Ethics Charter**, which was first issued in May 2017, and which clearly states that the Group's operational and behavioural principles comply with international laws and regulations on the protection of human rights and on the prevention of forced labour, child labour and corruption.

- The **Code of Conduct**, which each Crédit Agricole S.A. Group entity must prepare to implement the principles of the Group's Ethics Charter. The Crédit Agricole S.A. Code of Conduct was disseminated in September 2018, after being approved by the Board of Directors on 14 May 2018 and being presented to employee representative bodies in June 2018.

All of the above documents are available on our website¹.

The procedures that Crédit Agricole S.A. has implemented or is putting into place include, but are not limited to the following:

▪ **Procedures for our employees**

We make sure that all of Crédit Agricole S.A.'s internal HR procedures are consistent with the commitments described above. As a signatory of the Diversity Charter, we have asserted our commitment to promote cultural, ethical and social diversity in the workplace and our determination to prevent discrimination. Furthermore, the Group's Ethics Charter specifies the behaviour that is expected of all employees. The Crédit Agricole S.A.'s Code of Conduct reminds employees that they must strictly observe the rules that govern professional ethics and the respect for human rights and fundamental labour rights, both in their relationships with other employees and with all other parties.

A body of compliance procedures has been distributed and is regularly updated. This includes a specific procedure for reporting non-compliance. Whenever employees observe an instance of non-compliance, they have an obligation to inform their supervisor, who in turn must inform the Compliance function.

There is also a whistle-blowing mechanism that is available to all Crédit Agricole Group employees, external and occasional staff, and contractors and suppliers with which the Group has an established business relationship. This enables these people to report any failure to comply with the Group's ethics, policies or procedures directly to the entity's Compliance officer and without informing their supervisor. In accordance with regulations, the whistle blower's identity is kept confidential. To assist employees who wish to exercise their whistle-blowing right, the Crédit Agricole Group is deploying a new IT platform for reporting compliance alerts that ensures the strict confidentiality of the whistle-blower's identity, of the information reported, of the person or people involved, and of the information exchanged between the whistle-blower and the person who processes the information. This tool will be progressively deployed throughout the Crédit Agricole Group in the first half of 2019.

▪ **Procedures for our suppliers**

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

- Identify and assess the most risk-exposed sectors of our supply chain
- Monitor these sectors
- Prevent the risks of modern slavery practices within our procurement process.

The Crédit Agricole Group's Responsible Purchasing Policy has been signed by the chief executive officers of each Group entity, who are thus committed to complying with its principles within the scope of their responsibilities. This policy applies to employees who are involved in the purchasing process and to suppliers. The rules that apply to purchasing are also explained in a procedural memo that was updated in 2019 and which applies to all employees. In 2018, Crédit Agricole S.A. was once again

¹<https://www.credit-agricole.com/responsable-et-engage/la-rse-facteur-de-performance-durable-pour-le-groupe-credit-agricole>

and <https://www.credit-agricole.com/le-groupe/ethique-et-conformite/culture-conformite-et-ethique>.

awarded Responsible Purchasing and Supplier Relations certification from the Ombudsman of the French Republic and the National Purchasing Council, and this certification was extended to all of the Group's subsidiaries for the first time.

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

The analysis of CSR purchasing risks is based on three complementary approaches, which include an assessment of the risk that is specific to each category of purchases, an analysis of the supplier risk, and an analysis of the geographic risk, which may negatively impact the overall rating. In 2017, the Group Purchasing Department worked with three leading banking groups and the French standards body AFNOR to remap the CSR risks that are intrinsic to each purchasing category. In 2018, the Crédit Agricole S.A. Group used the findings of this work to identify, analyse and prioritise the riskiest categories of purchases on the basis of environmental, social, human rights, ethical and supply-chain criteria.

For the categories of purchases that require supplier approval by the Crédit Agricole S.A. Group, the CSR supplier assessment form is systematically attached to all requests for proposals. This assessment covers their CSR management system and offering, and includes human rights criteria. Since 2012, this assessment has been entrusted to EcoVadis, an independent company whose contract was renewed in 2018. It is used to obtain an overall CSR rating, which accounts for at least 10% of the supplier purchase decision.

Based on one analysis of gross risk, three categories of purchases identified as high or very high risk in our mapping have been worked on through an action plan to reduce the risks, namely the construction, IT equipment and advertising objects categories. These action plans will be deployed in 2019 to reduce the net CSR risk of suppliers for these categories.

Lastly, Crédit Agricole S.A. provides funding to Human Resources Without Borders, an international NGO that promotes and defends human rights at work. Human Resources Without Borders provides its contributors with forced labour and child labour risk maps for each geographic region, which are an additional source of information we use to update our purchasing risk map.

AWARENESS-RAISING AND TRAINING

A Purchasing Responsibly e-learning module has been made available to the Crédit Agricole S.A. Group's purchasing staff, to inform them of the various risks involved and the measures that have been implemented, and enable them to comply with their employer's procedures and policies. This module, which is included in the employee training catalogue, is also accessible to all Crédit Agricole S.A. Group employees. This ensures that any employee who may potentially be involved in a purchasing transaction is able to be informed of and comply with the Responsible Purchasing Policy, which includes the prevention of the risks of modern slavery and human trafficking within our supply chain and within our company.

CONTINUOUS IMPROVEMENT

The Crédit Agricole S.A. Group intends to incorporate its efforts to prevent modern slavery within its overall strategy for achieving sustainable performance and which is based on operational and behavioural principles that are consistent with the values it defends. Accordingly, all efforts to prevent the risks of human rights breaches are developed in accordance with the measures of the 2018 Vigilance Plan, which was prepared within the framework of the French Act of 27 March 2017 on the Duty of Care

of Parent Companies and Companies that Contract for Goods and Services, and with the various measures of the 'Sapin 2 Act' of 9 December 2016 on Transparency, the Prevention of Corruption and the Modernisation of the Economy.

These efforts are part of a continuous improvement process, the main components of which are:

- Improving risk identification and management tools, while updating risk maps when necessary and deploying targeted action plans to reduce the CSR risk of suppliers in the purchasing categories identified as 'high risk' and 'very high risk'
- Including our suppliers in our efforts, by regularly informing them of our responsible purchasing commitments and strategy
- Making our whistle-blowing procedure more easily available to our external and occasional staff, and to our contractors and suppliers with which we have an established business relationship, by enabling them to access the IT platform we are currently deploying.

Montrouge, 21 May 2019

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke at the bottom.

Philippe Brassac
Chief Executive Officer