

## **STATEMENT ON TACKLING MODERN SLAVERY AND HUMAN TRAFFICKING**

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

This statement describes the steps taken by Crédit Agricole Corporate and Investment Bank (Crédit Agricole CIB) for the financial year ended 31 December 2017 to tackle all forms of modern slavery and human trafficking in its business activities and supplier relationships.

This statement has been approved by the Board of Directors of Crédit Agricole CIB on 1<sup>st</sup> August 2018.

### **CREDIT AGRICOLE CIB, CORPORATE AND INVESTMENT BANK OF THE CREDIT AGRICOLE GROUP**

Crédit Agricole Group is a bank that serves 52 million customers, 9.7 million members and 1.1 million individual shareholders in 49 countries worldwide. Crédit Agricole Group employs 139,000 people in France and abroad. Its business activities support the investment and environmental protection projects of its customers, which include multi-national groups, SMEs, farmers, tradesmen, associations, local authorities and individuals.

Crédit Agricole CIB, subsidiary of Crédit Agricole SA, is the corporate and investment bank of the Crédit Agricole Group, serving 7700 corporate customers.

Crédit Agricole CIB offers its clients a wide range of products and services in capital markets and investment and corporate banking. The Bank provides support to its clients in key international markets through its global network in 34 countries, including major countries in Europe, Americas, Asia-Pacific and the Middle-East.

In the course of their business activities, Crédit Agricole Group and Crédit Agricole CIB may use suppliers who may themselves use sub-contractors.

In 2017, the main purchase agreements and services agreements involved property, information systems, intellectual services, general purchases and communications.

### **OUR COMMITMENTS**

We do not tolerate any form of modern slavery or human trafficking in our supply chain or in our business operations. We are therefore committed to tackling all forms of modern slavery and human trafficking throughout our supply chain and we require the same standards from all of our suppliers.

Our key commitments include, but are not limited to, the fundamental principles expressed in the following texts :

- The principles of the Universal Declaration of Human Rights promulgated by the United Nations in 1948,
- The ten principles of the United Nations Global Compact since 2003,
- The Equator principles since 2003,
- The United Nations Sustainable Development Goals since 2015,

- The United Nations Guiding Principles on Business and Human Rights,
- The OECD Guidelines for Multinational Enterprises,
- The conventions of the International Labour Organization.

These commitments are set out in policies formalizing the principles of professional ethics and ethical behaviors in social and environmental aspects that apply within our Group, particularly with respect to human rights :

- **Sectoral Financing Policies**, whose environmental and social guidelines cover aspects related to respect for human rights. For each sector covered, a reference framework is defined and analysis criteria are defined that correspond to the aspects taken into account in the analysis of transactions as well as exclusion criteria delimiting the projects and the operations that the Group does not want to support.

- **Diversity Charter** since 2008, which affirms Crédit Agricole S.A.'s commitment to promoting diversity and tackling all forms of discrimination.

- **Human Rights Charter** adopted in 2008, which confirms that all Crédit Agricole S.A. Group entities respect the principles and fundamental rights set out in the Universal Declaration of Human Rights and the conventions of the International Labour Organization covering, in particular, issues related to forced labour, child labour, discrimination and freedom of association.

- **The Responsible Purchasing Policy and the Responsible Purchasing Charter** revised in 2017, which is based on reciprocal commitments between Crédit Agricole S.A. Group entities and its suppliers based on the fundamental principles of the United Nations Global Compact.

- **Crédit Agricole Group's Ethics Charter**, which sets out the Group's guidelines for action and behavior in line with the applicable international agreements and conventions on human rights, the prevention of forced labour and child labour, and the fight against bribery and corruption.

All of these documents are available via the links below:

- <https://www.credit-agricole.com/en/responsible-and-committed/csr-a-factor-of-sustainable-performance-for-credit-agricole-group>  
<https://www.ca-cib.com/about-us/committed-and-responsible>

The procedures that are currently in place or in the process of being implemented at Crédit Agricole CIB include, but are not limited to, the following :

- **With respect to our employees**

We ensure that all our internal HR procedures abide the commitments taken by Crédit Agricole S.A. at the Group level, as referred to above.

As a signatory of the Diversity Charter, we affirm our commitment to cultural, ethnic and social diversity and state our goal of tackling all forms of discrimination.

In addition to the Group procedures, Crédit Agricole CIB has put in place a set of rules that include notably a whistleblowing mechanism. The centralized procedure for reporting alerts and gathering reports made available to all Group employees in the fight against fraud and corruption also enables them to exercise ethical alerts transmitted to the compliance officer of their entity without going through the line management. Confidentiality about the identity of the employee is the rule in case of alert.

- **With respect to our suppliers**

In order to identify and tackle the risk of modern slavery and human trafficking practices, we have put in place procedures to:

- Identify, assess and monitor the areas of greatest risk in our supply chain ;
- Tackle the risk of modern slavery and human trafficking in our supply chain.

In 2017, the Group Purchasing Department participated in an interbank working group in collaboration with AFNOR, which listed the most common risk categories related to purchases in terms of CRS. In addition, Crédit Agricole S.A. participated in the endowment fund of the international organization "Ressources Humaines sans frontières", which works to promote human rights at work. This organization provides us with a mapping of the specific risks of forced labour and child labour. These theoretical risk maps will be included in Crédit Agricole CIB's Purchasing Risk Mapping Update, which is conducted with particular attention to purchases carrying risks related to human rights.

Our suppliers are required to adhere to our values through our purchasing charter («Charte achats responsables»), which is provided to them together with our tender process documents and then included as part of the final contract as a commitment. The charter requires our suppliers to commit directly, and on behalf of their own supply chains, to comply notably with the obligations to respect human rights and all the applicable laws and regulations. These aspects are reflected in the Procurement procedure of Crédit Agricole S.A. and the governance text "Règles de fonctionnement des Achats de Crédit Agricole CIB » (Crédit Agricole CIB's Procurement Operating Rules) which are mandatory for all employees.

The CSR evaluation of suppliers is systematically integrated into each tender process. This evaluation focuses on performance management and CSR risk, including criteria related to the respect for human rights. This type of evaluation has been entrusted since 2012 to an independent and specialized third party, EcoVadis.

In addition, all of Crédit Agricole CIB's standard models of supplier contracts include a specific clause "Respect for human rights, environmental protection and the fight against corruption" by which suppliers state and guarantee that they respect and enforce in their supply chains all their obligations in terms of identifying risks and preventing serious human rights abuses and fundamental freedoms, the health and safety of persons and the environment resulting from their activities, under laws and / or regulations related to the respect of human, social and environmental rights. This clause expressly refers, for the United Kingdom, to the law of 26 March 2015 on tackling modern slavery and human trafficking, known as the "MSA" law.

## **TRAINING**

An e-learning module "Acheter responsable" is offered to employees of the purchasing business line of the Crédit Agricole S.A. Group, which makes them aware of the issues and measures taken and enables them to comply with the company's policies and procedures. This e-learning, included in the training catalog, is also accessible to all employees of Crédit Agricole CIB so that all potentially concerned employees understand and may be able to identify the risks related to modern slavery and human trafficking in our supply chain and in our company.

## CONTINUOUS IMPROVEMENT

Crédit Agricole CIB, like the Crédit Agricole SA Group, intends to integrate its actions to tackle modern slavery into its overall strategy, which aims a sustainable performance based on principles of actions and behavior in line with the values the company supports.

Thus, the prevention of the risk of human rights abuses will be developed in line with the Crédit Agricole SA Vigilance Plan 2018 established in the framework of the French law of 27 March 2017 (*"loi française du 27 mars 2017 relative au devoir de vigilance"*) and with the framework set up by the French law of 9 December 2016 (*"loi française du 9 décembre 2016 relative à la transparence, à la lutte contre la corruption et à la modernisation de la vie économique"*).

Crédit Agricole CIB's entire approach is part of a process of continuous improvement that will focus on the following areas:

- Continue the implementation of the Group's policies incorporating the principles of respect for human rights, in particular the Codes of Conduct adopted by Crédit Agricole S.A. in accordance with the Ethics Charter.
- Strengthen risk identification and control tools by updating, if necessary, risk mapping and including specific clauses in supplier contracts.
- Seeking to associate our entire supply chain with our approach by organizing meetings with suppliers to discuss our purchasing strategy and raise awareness of the issues related to respect for human rights, by making our alert reporting system available to employees of our suppliers.

The 1<sup>st</sup> August 2018

Jean Yves Hocher

CEO