



# CODE OF CONDUCT

# INTRODUCTION



**Philippe Brassac**

*By expressing the aim of being at the service of customers and society, our Raison d'Être leads us to aim beyond compliance to ethics. Compliance is indeed a minimum level that leads us to structure our businesses to ensure that legal and professional constraints are respected. Ethics go beyond this: they reflect a greater goal, that of our Group Project.*

*They are the natural expression of our DNA, of being useful to the greatest number. They are an element of positive differentiation. Our principles and commitments are set out in the Group Ethics Charter. This document has been implemented in the Codes of Conduct specific to each entity, including Crédit Agricole S.A.*

*Our principles and commitments are expressed in our Group Code of Ethics. This is set out in concrete and operational terms in the Codes of Conduct specific to each entity, including within Crédit Agricole S.A.*

*This Code is the basis for the ethical and professional conduct to be observed by all. I am counting on each of you to incorporate its content into your daily decisions and actions.*

**Philippe Brassac**  
**Chief Executive Officer**  
**Credit Agricole Société Anonyme**


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# I. OUR COMMITMENTS





Listed on the stock market since 2001, Crédit Agricole S.A. performs a two-fold role: as the central body of Crédit Agricole, which it represents in dealings with the banking authorities, and as the parent company of the Group's large business subsidiaries. In this regard, the Group notably ensures its cohesion and proper functioning, ensures that the strategic development of its activities in France and abroad is coherent, and guarantees its financial unity.

Crédit Agricole is unfailingly committed to its historic values of customer focus, responsibility and solidarity, which it promotes in its Group-wide Code of Ethics, published in May 2017.

This reference document sets out principles regarding the actions and behavior to be followed vis-à-vis our customers and all our stakeholders including employees, suppliers, service providers, state representatives, associations and NGOs, shareholders and investors.

While our Code of Ethics sets out our commitments, identity and values as well as the principles underpinning our actions, our Code of Conduct puts into practice the commitments set out in our Code of Ethics which is the foundation of the ethical and professional conduct to be respected by the employees. It responds to the strategic desire of the Management Board to promote the Group's historic values in a structured ethical approach and in its operational applications.

Our Code of Conduct is designed to provide guidance in our everyday actions, decisions and behavior. Our Code of Conduct is the result of ongoing joint development by all of our business lines and the Human Resources, Purchasing, Communications, Marketing, Compliance, Legal and Sustainable Development units. It sets out specific situations that illustrate different activities carried out by the business lines.

In addition to the application of all the legal, regulatory and professional rules governing our various activities, our Code of Conduct reflects our determination to do even more to serve our customers and all of our stakeholders in the best way possible.

Our Code should not be considered as a set of constraints but as a more concrete expression of the values we share.

## II. USING OUR CODE OF CONDUCT







# USING OUR CODE OF CONDUCT ►

The Crédit Agricole S.A. Code of Conduct sets defines (with specific rules of conduct on a daily basis) the values always adhered to by the Group and presented in the Ethics Charter.

It is a tool and a guide to help us better explain our professional obligations and adopt behavior that is in line with Crédit Agricole Group's ethics and values.

## WHO DOES IT APPLY TO?

The Code of Conduct applies to us all: directors, managers and employees, regardless of our position and function within Crédit Agricole S.A.

## OBJECTIVES AND HOW TO INTERPRET THE CODE

Our Code of Conduct is a reference document and a tool to help us make decisions in accordance with our values, our ethical principles and the law. It explains, topic by topic, the professional behaviour to be followed and promoted in carrying out our duties and in our working relationships.

Our rules of conduct are organized into four sections:

- Customer and supplier relations;
- Social, environmental and societal issues;
- Anti-corruption;
- Protection and reputation of the Group.

Note that conflicts of interests, which is a cross-functional topic, is included in the anti-corruption section.

To provide further information, some practical cases have been cited to illustrate, using specific examples, the principles presented in the Code.

Nevertheless, our Code of Conduct is not intended to be exhaustive. Neither does it claim to answer all questions or address all possible cases, particularly with regard to what you must do and must not do. For this reason, in all situations and when making decisions, everyone should ask themselves the following questions:

## FIVE QUESTIONS TO ASK TO ENSURE ETHICAL BEHAVIOUR



1. Is it legal?
2. Is it in line with the Group's Code of Ethics and Code of Conduct?
3. Is it in the interest of our customers and stakeholders?
4. Have I taken into account the risks involved and what the consequences of my decision could be?
5. Would I be comfortable if my decision were to be made public internally and externally?

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, Sustainable Development, or any other department qualified to deal with the issue at hand and keep a record of all problems encountered.

## WHO SUPERVISES THE IMPLEMENTATION OF THE CODE? WHO UPDATES IT?

In the Group, the implementation and updating of the Code is the responsibility of a team supported by the directors of Compliance, HR and Sustainable Development. The Compliance Department is responsible for implementing and updating the document at Credit Agricole Bank Polska S.A. The changes of the Code are prepared in cooperation with other entities of the Bank.

The content of the Code may change over time. It is duty and responsibility of each of us to familiarize ourselves with it and to abide by the rules contained therein.

## HOW CAN I GET ACQUAINTED WITH THE CODE OF CONDUCT? WHERE IS IT AVAILABLE?

The Code of Conduct is a document that is made public and shared with stakeholders. It is available on the websites and intranet of the bank and Crédit Agricole S.A.

## WHAT DOES IT MEAN ON A DAILY BASIS FOR EMPLOYEES?

We must all be aware of the principles set out in the Code of Conduct and respect them when performing our daily duties. In addition, we adopt and promote the values and principles presented in the Code of Conduct, with vigilance and good intentions. Lastly, we must take the training offered to us on the subjects covered by the Code of Conduct.

## ONE KEY RULE TO REMEMBER



Whenever you notice or suspect an inappropriate act or form of behavior, or when you feel under pressure, you must immediately talk about it with your manager.



## WHAT IS WHISTLEBLOWING?

The aim of the whistleblowing system is to prevent risks by providing all employees and business partners the means to report breaches of the law as well as procedures and ethical standards applicable in the bank, in accordance with the procedure “Whistleblowing at Credit Agricole Bank Polska S.A.”.

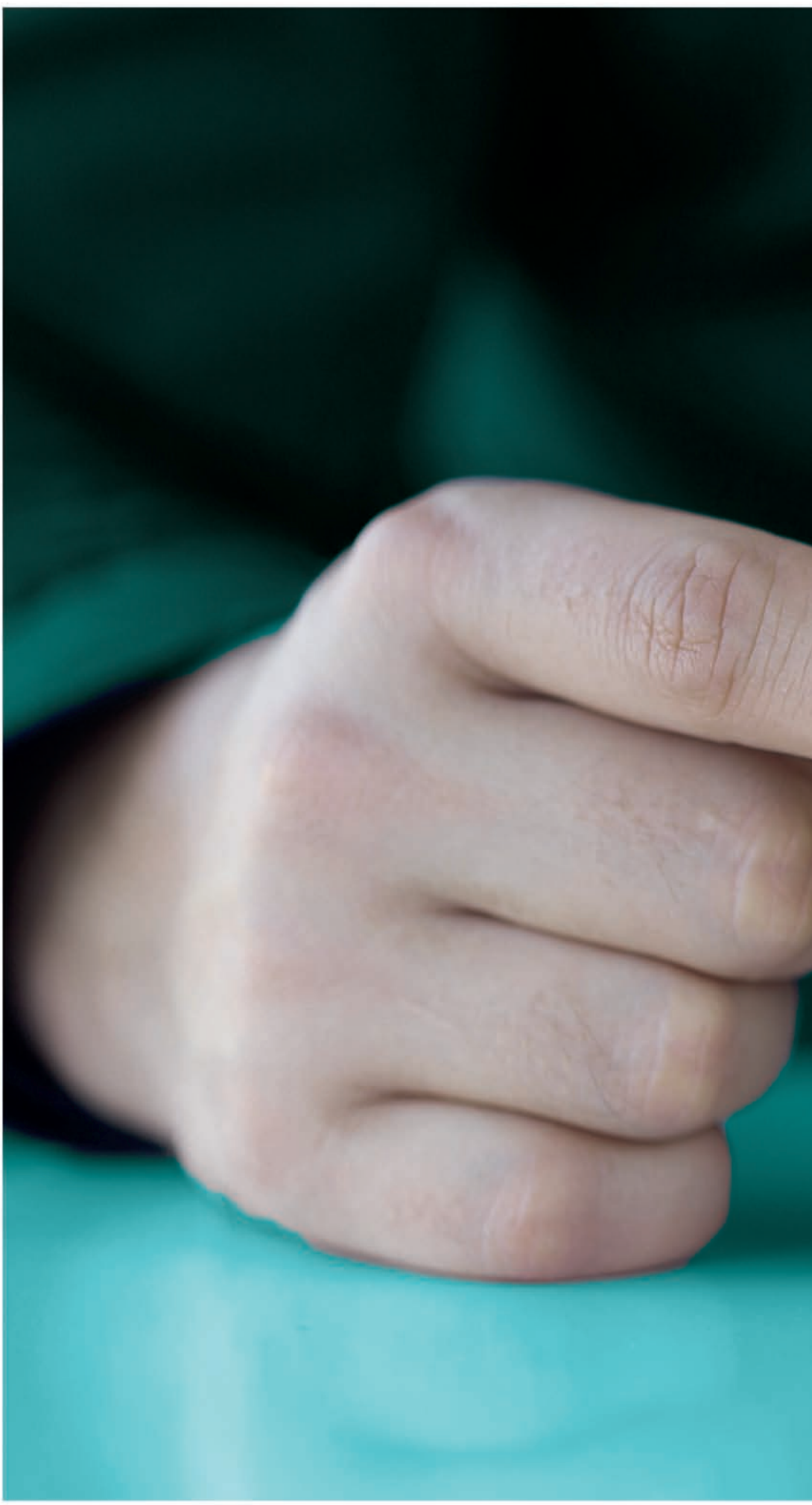
## WHAT IS THE ROLE OF DIRECTORS AND MANAGERS AND THE EXPECTATIONS OF THEM?

As an director or manager, you must embody the Group’s values as set out in the Code of Ethics and be exemplary in applying the principles of the Code of Conduct.

As an executive manager, you must ensure your teams know you are always there to listen to their needs and create a climate of trust so that they will not hesitate to seek your advice if they have a problem.

You have to be able to explain the functions of the Code and how to apply them. If you have any questions, don’t hesitate to consult the department most qualified to deal with the issue at hand (Compliance, Human Resources, Sustainable Development, etc.). You must be vigilant and conduct yourself in a transparent manner. Show that it is entirely possible to attain the objectives that have been set, while respecting the ethics and values of the Group.

# III. OUR RULES OF CONDUCT



A hand is shown placing a green block labeled 'ETHIC' on a stack of wooden blocks. The stack consists of seven blocks in total, with the top one being green and the others being light-colored wood. The background is dark teal, and the surface the blocks are on is a lighter teal. The words on the blocks are in bold, black, sans-serif capital letters.

**RESPECT**

**VIGILANCE**

**RESPONSIBILITY**

**ETHIC**

**ATTITUDE**

**LOYALTY**

**INTEGRITY**



# EVERYDAY ETHICAL PRACTICES ►

## DEFINITION

Ethics is an approach that aims to constantly question the **PROPER CONDUCT** of our actions with regard to the values and principles shared within the bank and with stakeholders, in line with societal expectations. Expressed as professional rules of conduct underpinning our activity, they define our ethical approach.

Ethics provide guidelines for our decision-making.

## DETAILS

### Ethics concern:

- The Group's values (customer focus, responsibility, solidarity), which are expressed in ethical principles such as respect for others, loyalty, transparency, respect, etc., and developed into «principles of action» on a daily basis (e.g. the fight against discrimination). It is thus the basis of the Group's raison d'être «Acting every day in the interests of our customers and society»;
- The approval and adoption of these values and the ethical framework by the highest level of corporate governance;
- A general mission to guarantee the Group's identity as a company and the trust necessary for life at work and relations with stakeholders.

**Compliance refers to a regulatory environment, with respect for the rules applicable to financial institutions, as well as to the means to achieve it via:**

- Implementation of internal rules and procedures transposed into the bank the laws and regulations;
- Existence of a regulatory and control function performed by a senior manager, which allows the bank, especially in regulated sectors of activity, to prevent serious incidents related to the risk of non-compliance.

**Ethics go beyond compliance. They encourage respect for values and rules of conduct, while compliance aims to prevent violations of ethical and legal standards in order to protect the bank from sanctions and reputational (or image) risk.**

## “ACTING IN AN ETHICAL MANNER”

### MEANS:

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

All relations must be established in accordance with the principles of loyalty and solidarity, and with the commitments made to our customers and suppliers. Decisions must be made by prioritizing customers' interests, respecting the principle of fair and equitable choice of suppliers and the rules of competition.

#### ► RESPECT FOR INDIVIDUALS

With regard to relations between bank employees or with all of its stakeholders, human rights and people's fundamental social rights must be rigorously applied. By preventing all forms of discrimination and harassment, promoting diversity and equality, respecting health and safety measures, and ensuring the protection of employee and customer data, we create a good working environment, which is a source of productivity and satisfaction.

#### ► RESPECTING THE COMPANY'S ENVIRONMENTAL AND SOCIETAL COMMITMENTS

For Crédit Agricole S.A., this means being a bank that supports the customer and is useful to society. Crédit Agricole S.A. wishes to play its role to the full as a supporter of the climate transformation and an influencer for a more sustainable economy. Special attention is therefore paid to «Green Finance» with the ambition of remaining a benchmark in supporting the transition to a «low-emission» economy.

Each employee, regardless of their position, is responsible for implementing the sustainable development and ESG strategy and supporting this transformation and integrating climate and social cohesion issues into their activities. The bank sees sustainable development and ESG as an integral part of all areas of its business and conducting business in a responsible manner that takes into account the expectations, impact and needs of all stakeholders in the entire value chain of the bank. Sustainable development and ESG in the bank is treated as a way of thinking, earning profit in an ethical and responsible manner and as a daily practice of every employee.

## ► PREVENT AND DETECT CORRUPTION AND INFLUENCE PEDDLING

The fight against corruption is a major common-good objective. In terms of preventing corruption and influence peddling, Crédit Agricole S.A. must adhere to its values, in particular: honesty, integrity, loyalty, transparency, impartiality.

The anti-corruption component incorporates the fundamental principles of implementing appropriate measures to prevent, detect and deter corrupt practices or influence peddling by applying “zero tolerance” rule. Other areas include gifts and invitations, facilitation payments, conflicts of interests, patronage, sponsorship and lobbying.

## ► BEING VIGILANT ON A DAILY BASIS

To maintain trust, we must take responsibility for the use that can be made of the available resources and information in the bank, and comply with the rules related to the risk of conflict of interests. We must also ensure that we do not inappropriately disseminate or exploit, for our own account or on behalf of a third party, any confidential information that is held.

The vigilance of all must enable us to protect the interests of our customers, fight against money laundering and the financing of terrorism, respect the law on international sanctions, fight against tax evasion, prevent fraud and protect the integrity of the market..

## ► ABSTAIN FROM CARRYING OUT ANY ACTIONS THAT COULD DAMAGE THE REPUTATION OF CRÉDIT AGRICOLE S.A.

We are responsible for ensuring the image of Crédit Agricole S.A. The risk of negative publicity, particularly on the social networks, could potentially damage Crédit Agricole S.A.’s image and erode the trust our customers in the bank and the Group.

To avoid this, we must protect our reputation by respecting all the principles set out in this code, and be careful not to speak publicly on behalf of the bank without proper authorization, not to disclose confidential information about our professional environment, and not to participate in the spreading of rumors.

# CODE OF CONDUCT



## CUSTOMERS AND SUPPLIERS RELATIONS



# 1. RELATIONS WITH CUSTOMERS ►

## INTRODUCTION

The Crédit Agricole Group places the trust and satisfaction of its customers and mutual shareholders at the heart of its actions. Crédit Agricole S.A. wants all of its employees to be involved in this relationship, bearing in mind that the interest of the customer is the priority in all actions carried out by its employees, including its partners.

## DETAILS

To ensure that customer expectations are met, we conduct customer satisfaction surveys, in conjunction with the sales networks and particular business lines and cover the entire market. Customer complaints are handled within the customer-facing entities to constantly improve and strive for excellence in relations. Employees responsible for both direct and indirect contact with the client are subject to training in the relevant scope.

## THE COMMITMENT

### OF CRÉDIT AGRICOLE S.A.

As a universal, customer-focused bank, Crédit Agricole looks to forge global and sustainable relationships with its customers. Thanks to the implementation of the partnership concept, the bank's employees constantly accompany clients, making their lives easier, supporting them in achieving their goals, and advising them in making decisions by proposing solutions adapted to meet their needs.

Crédit Agricole supports clients by warning them about the risk and helping them in a difficult life situation as a result of random events or an unfavorable financial situation.

In addition, the Group constantly invests and innovates to develop and strengthen its customer relationships, particularly by way of its redesigned digital architecture. By choosing to adopt a multichannel banking model that is 100% human and 100% digital, our aim is to offer our customers a new banking experience that combines efficiency and customer focus. We carry out all these activities in full respect of the provisions on the protection of personal data.

### I must do:

- Listen to your customers and consider each action in their best interests;
- Get to know your customers better, while respecting their right to privacy, so that you can advise and support them appropriately;

- Ensure that you always provide clear and accurate information that is not misleading;
- Make sure that all customer offers introduced to the market have been analyzed and approved as part of the NAP process (in accordance with the Policy of Approving New Products at Credit Agricole Bank Polska S.A.), including in terms of compliance with applicable regulations, especially in terms of information for customers and matching products to their needs
- Be vigilant to prevent all forms of fraud in order to protect customers, and fight against money laundering, the financing of terrorism, and corruption, etc.;
- Report any malfunction or situation that could lead to a conflict of interests to your manager.

### I must not do:

- Place your personal interests or those of the Crédit Agricole Group before those of our customers;
- Facilitate, encourage and assist customers in any actions intended to infringe laws and regulations;
- Propose a product that has not yet been authorized by a NAP Committee.

## EXAMPLES

*I am proposing a new product with an optimal term of ten years: what precautions should I take when determining the target clientele?*

To determine your target clientele, you need to check whether the customer's investment horizon is not inconsistent with the recommended investment period in the product and whether the product fully meets the needs of this customer group. It is mandatory that this new product be submitted for assessment by a NAP Committee.

*After reviewing my motion, the Committee NAP issued a condition. However, I am aware that due to competition, this new product should be launched rapidly within the next few days, can I still start implementing it?*

No, the pre-implementation conditions must be met before the new product is launched. The NAP Committee's conditions are binding, so you cannot launch a product or service until all the conditions are met.

## 2. CUSTOMERS' PERSONAL DATA ►

### INTRODUCTION

The Crédit Agricole Group has drawn up a Personal Data Use Policy regarding the use of customers' personal data. This document provides a reference framework for its employees who process this type of data. It is a reminder of the commitments made by the Group as well as the best practices to be observed. The bank applies the Personal Data Protection Policy of Credit Agricole Bank Polska S.A.

### THE COMMITMENT

#### OF CRÉDIT AGRICOLE S.A.

The Crédit Agricole Group has taken a position on the sensitive issue of personal data, by committing to act in an ethical and responsible manner and adopting a transparent and to provide appropriate information to customers.

#### I must do:

- Involve data protection experts in the projects to ensure compliance with regulations on the protection of personal data;
- In the same way, involve experts and representatives from the areas of Information Security and Operational Security in the project;
- Ensure the project is in keeping with the principles of the Policy: security, integrity and reliability, ethics, transparency and education;
- In case of doubt, contact the Data Protection Officer (DPO).

#### I must not do:

- Lead a project that involves processing personal data without having verified the compliance of your project with the personal Data Protection Officer (DPO);
- Make any use whatsoever of personal data that does not respect the key principles indicated in the Policy;
- Process personal data for purposes other than those that the client has been informed about and consented to;
- Fail to comply with the rules and recommendations put in place within the Group to ensure personal data security and confidentiality, particularly by giving unauthorized persons access to this data.

### EXAMPLES

*My team is implementing a new tool that uses our customers' personal data. I understand that since the entry into force of the GDPR, I do not have to report it to the President of the Office for Personal Data Protection? What duties should I perform?*

Since 2018, the GDPR obliges the Bank to keep a register of personal data processing activities. As the business owner of the data, you will be required to register the process that involves data processing and regularly verify and update it. In addition, if a new tool is likely to cause a high risk of violating the rights or freedoms of natural persons, e.g. processing of sensitive data, large-scale Innovative use or application of new technological or organizational solutions, a Data Protection Impact Assessment (DPIA) should also be performed. The Data Protection Officer team will provide you with support in this regard.

*I want to build up my customer database with public information (such as profiles published on the social networks). This would 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 though these data have been made public, you need your customers' consent to use them. You must also take into consideration the fact that this information is not necessarily reliable. However, from the customer's point of view, these are their special details.. Is it therefore appropriate to use them? Refer to the best practices and the guidance on interpretation presented in the Customer Chart. Ask for advice from our experts in the Legal Department, the Compliance Department, Data Protection Officer and/or information security.

### 3. FAIR AND EQUITABLE CHOICE OF SUPPLIER ►

#### INTRODUCTION

Choosing a supplier in an equitable and fair manner above all requires ensuring that all services providers receive the same treatment.

#### DETAILS

The equitable choice of supplier must be made as a result of a fair competition between bidding companies within the context of a call for tenders. This choice must be based on objective elements that notably include the respect for human rights and fundamental freedoms.

#### THE COMMITMENT

##### OF CRÉDIT AGRICOLE S.A.

For this choice to be fair, all suppliers must receive the same treatment from the buyers, the decision-makers and any other employee of the Crédit Agricole Group, which would be affected, and the choice must be based on objective elements.

This implies to adopt a responsible and fair attitude to the suppliers throughout the duration of the call for tender. Consequently, taking purely individual interests into consideration in selecting the chosen firm should be avoided.

In addition to observing a responsible and fair attitude towards buyers during the tender process, all Crédit Agricole Group employees must negotiate in good faith with bidders. The requirement to act in good faith should precede the conclusion of the contract and is not a matter of discretion.

This means that either partner can unilaterally terminate the negotiations at any time, provided they do so in good faith and in a fair manner.

#### I must do:

- Report any potential risk of conflict of interests (for example, the existence of a family member working in one of the bidding companies in calls for tenders, etc.);
- Make sure that all respondent companies receive a response within a sufficient and identical time frame. To ensure this, distribute the call for tender dossiers after all the bidding companies have been identified and do not add any more companies to the list once the call for tender has been launched;
- Ensure that all bidding companies interviewed receive the same initial information, data and documentary materials (tender documents, specifications, technical documents, functional documents, etc.);

- In the event of oral interviews, ensure that all of the bidding companies are invited to one or more such sessions, the duration of which must be identical for each company interviewed;
- If negotiations break down at an advanced stage, it is advisable to warn the partner as far in advance as possible and to supervise the final talks;
- In general, act transparently throughout the tender procedure.

#### I must not do:

- During calls for tenders, provide specific information to only some of the companies approached;
- Give any of the bidding companies an indication of the content of the bids or the level of response of the other companies participating in the call for tenders;
- Accept any invitations, gifts or benefits in kind from one or more of the bidding companies during the call for tender or the contractual negotiations. Once the contractual negotiation phase has been completed, the “gifts and invitations” regime comes into force (see specific card on “Gifts and invitation”);
- Do not break off negotiations overnight without giving prior notice to the bidder of the intention to terminate the discussions;
- Change the selection criteria, and/ or the ranking weighting, after the date of receipt of the replies to the call for tenders.

#### EXAMPLES

*I heard that during negotiating periods, no gifts may be accepted. Is that right?*

Indeed, all gifts (even of an advertising nature) and invitations must automatically be refused. In absolute terms, this means that you must not accept any benefits in kind since this could distort your judgement when selecting your supplier.

*I contacted and met with a company that meets my needs perfectly. It even came up with some additional proposals. I decided to forward the details of the company to a buyer in the Crédit Agricole Group so that it could become included in the list of companies to be interviewed in the context of a call for tenders. Is this the right approach?*

First of all, you have to summarize what you need then draft a specification note. You should determine, together with the buyer, a list of companies that you will invite to bid. What's more, make sure that the buyer participates in every stage of the tender, so that you can choose the company that best meets your needs.



## 4. RESPONSIBLE RELATIONS WITH SUPPLIERS ►

### INTRODUCTION

Reasonable due diligence is necessary to ensure that all players in the supply chain act in accordance with a certain number of commitments and principles, notably concerning the respect of human rights and fundamental freedoms, workplace regulations, the fight against discrimination, the support and promotion of diversity as well as the protection of the environment and business ethics. If a player in the supply chain fails to act in accordance with these commitments and principles, the Group's performance, reputation and image could be seriously affected.

### THE COMMITMENT

#### OF CRÉDIT AGRICOLE S.A.

The Credit Agricole Group has adopted rules regarding:

- ▶ Reliability in the area of finance, settlements with suppliers in accordance with the law;;
- ▶ Equal treatment;
- ▶ Transparency of our processes;
- ▶ Promoting sustainable and balanced relations;
- ▶ Counteracting corruption based on the principles that are made available to suppliers;
- ▶ Conducting a comprehensive cost analysis of all costs incurred over the lifetime of the goods or services;
- ▶ Taking into account social, sustainable development and ESG aspects when selecting suppliers;;
- ▶ Promoting the regions by choosing local suppliers when appropriate.
- ▶ Monitoring the supplier's state of economic dependence.

Those principles involves not only Crédit Agricole Group's buyers, but also all employees involved in a relationship with a supplier.

#### I must do:

- ▶ Behave honestly in dealings with suppliers so as to forge a bond of trust, whether the relationship is one off or long-term;
- ▶ Involve a buyer who is positioned sufficiently upstream in order to guarantee the entire purchasing process and manage risks, particularly at the legal, financial and operational level;
- ▶ Leave it to the buyer to inform the companies (bidders) that have not been selected as a result of the call for tender and to provide objective criteria justifying this decision;
- ▶ Compare the offers submitted by the suppliers inter-

viewed, on all of the bidding criteria, by factoring in the overall cost;

- ▶ Respect a sufficient turnaround time in the event of a change of supplier, in order to give that supplier a viable and acceptable withdrawal period;
- ▶ Prevent situations that could harm sustainable and balanced relationships with suppliers;
- ▶ Alert employees to the precautions to be taken **in the event of proven economic dependence** with a supplier.

#### I must not do:

- ▶ During informal or formal exchanges with a supplier, disclose and, in particular, provide information on the Crédit Agricole Group's strategy and any other sensitive data that would not be publicly available;
- ▶ Validate the receipt of services, without bothering about the further processing and payment of the supplier's invoices, and notably respecting the payment deadlines required by law and regulations;
- ▶ Fail to analyze or take into account all the criteria that could lead to the economic dependence of the supplier upon his selection, and throughout the bank's relationship with him;
- ▶ Terminate a contract without giving sufficient notice enabling the supplier to reorganize its business.

### EXAMPLES

*I want to launch a call for tenders and have five days to choose a supplier: is this possible?*

The supplier needs adequate time to respond. This is notably required with respect to our suppliers or to ensure that supplier responses are relevant and complete.

*I want to work with a supplier with whom I am entirely satisfied. I have been working with this supplier for 10 years now and almost all of his sales are generated with the Crédit Agricole Group. Is there a risk?*

The appointed buyer will obtain information about the supplier, concerning its economic dependence, and will propose appropriate solution. This situation may result in financial, operational and legal risks.

## 5. COMPETITION ►

### INTRODUCTION

Competition law consists of a set of rules applicable to both private and public enterprises operating in different markets. Its purpose is to maintain the principle of free and fair competition and to ensure consumer protection.

### CHALLENGES

Compliance with competition law is a threefold challenge for companies.

**Economic:** penalties for non-compliance are severe and may amount to as much as 10% of the revenue earned in the accounting year preceding the year in which the penalty is imposed;

**Reputational:** any breach is an attack on the company's reputation;

**Legal:** criminal liability may be incurred.

### DETAILS

Free competition may be restricted by, among other things: collusion or abuse of a dominant position.

A collusion is an agreement, concerted behavior or a planned and intentional collaboration between companies whose purpose or effect, even potentially, is to co-ordinate their behavior in order to limit competition. An agreement with a company, be it a competitor or not, may take the form of an oral, written, formal or informal agreement (during a business lunch, or at a trade association event, etc.).

In addition to the most serious cases of collusion, such as cartels - which jointly fix sales prices or commercial conditions - - there are also collusion actions involving the allocation of customers or the market, agreeing on tenders or taking a joint decision to boycott a customer or supplier.

Abuse of a dominant position concerns companies in a position to act unilaterally in a given market: pricing policies aimed at eliminating competitors or commercial foreclosure strategies and discriminatory practices, etc.

If the bank misuses the state of dependency of the business partner, then it is an abuse of economic dependence. Competition-restricting practices are prohibited regardless of their actual impact on the market. They concern e.g. obtaining unjustified or excessive advantages, imbalance between partners, abrupt break-up of business relationships, etc.

### THE COMMITMENT

#### OF CRÉDIT AGRICOLE S.A.

All Crédit Agricole S.A. activities must be carried out in compliance with competition law, one of the basic principles of which is that companies operating in a market must determine their strategy in an autonomous manner. Therefore, collusion as well as abuse of a dominant position and competition-restricting practices are prohibited. Any exchange of so-called sensitive information is prohibited. These include strategic data that is not made public (e.g. information on price formation and trends, customer lists, market potential and distribution methods, strategies, costs, etc.). It is however possible to exchange certain information with competitors of Crédit Agricole S.A. as soon as these are made public and where they relate to a topic of general interest for the profession or are within the framework of trade associations. This information must then be aggregated and not be able to be separated out (statistics etc.).

#### I must do:

- ▶ Avoid addressing sensitive issues when interacting with third parties outside the Group, regardless of the context;
- ▶ If such topics are brought up, put an end to the conversation and immediately notify your manager and the Legal Department;
- ▶ If in doubt about the degree of sensitivity of the information, check with the Legal Department before undertaking discussions with a competitor or trade association;
- ▶ In the context of formal and necessary relations with competitors, clearly indicate the purpose of the exchange, limit the discussion strictly to its purpose and keep a written evidence of the conversation;
- ▶ Contact the Legal Department before entering into any agreement likely to have a significant competitive effect on the market concerned.

#### I must not do:

- ▶ Consult with a competitor or exchange information with them on the prices of inter-banking services or on customer prices;
- ▶ Conclude any customer, territory or market sharing agreements with competitors;
- ▶ Boycott selected customers or suppliers;
- ▶ Negotiate clauses such as those limiting the commercial freedom of business partners without seeking advice from the Legal Department.

## 5. COMPETITION ►

### EXAMPLES

*I am attending a meeting as a representative of Crédit Agricole S.A. within a trade association. Which topics do I have the right to discuss and what provisions should I take?*

You can discuss various topics and coordinate certain actions with competitors, provided that these do not relate to subjects deemed sensitive.

Remember that attending (even passively) a meeting where the topic could be qualified as anti-competitive may be considered as membership of a cartel. Before attending any such meetings, make sure there is an agenda of the meeting.

If the participants do not comply with the non-competition rules, leave the meeting demanding that this fact has to be recorded in the minutes. Do not hesitate to seek help from the Legal Department to find out what attitude should be adopted before, during and after such meetings.

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

Recourse to the banking pool must be justified by the nature of the transaction and the objective reasons, notably in terms of risk assessment and risk acceptance. Coordination between the operators must be strictly limited to the financing operation for which the pool was established. Ensure that the coordination activity never deviates from the transaction in question and that this is recorded in the notes of the meetings.

*I am negotiating a contract with a business partner of the company as a representative of the bank: what precautions should I take?*

You need to ensure that the conditions you intend to impose on the partner do not create a significant imbalance between the partner and the bank. Negotiation precautions are specified in the bank's internal purchasing procedure.



# CODE OF CONDUCT



## **SOCIAL, ENVIRONMENTAL AND SOCIETAL ISSUES**

## 6. PROTECTION OF EMPLOYEES' DATA ►

### INTRODUCTION

Every employee has the right to respect for his private life. Personal data may be collected, processed and stored only for a specific and lawful purpose.

### DETAILS

The use of personal data is precisely regulated according to principles that apply to employees as well as to any other person:

- ▶ Only data collected for specific, explicit and legitimate purposes, which have been precisely defined beforehand, may be processed;
- ▶ Personal data should not be kept for longer than is necessary for the purposes for which the data is processed;
- ▶ The necessary measures must be taken to guarantee data confidentiality and to avoid any communication to unauthorized third parties;
- ▶ Everyone must be informed about the processing of any of their personal data. They also have the right to access and modify their information, and may oppose the processing thereof for legitimate reasons.

The destruction, loss, alteration, disclosure or unauthorized access to personal data may infringe upon the rights of individuals, as well as the individual and collective liberties of employees. Internal rules and procedures must therefore be respected.

### THE COMMITMENT

#### OF CRÉDIT AGRICOLE S.A.

In a context where people are being encouraged to provide personal data electronically, the Crédit Agricole Group has drawn up a personal protection data Charter based on five principles: integrity and reliability, ethics, transparency and education, security and customer control over the use of their data.

As an employer, Crédit Agricole S.A., adheres to the same process and guarantees its employees the protection of their personal data.

#### I must do:

- ▶ Ensure the appropriateness and relevance of the information collected;
- ▶ Ensure that each use of personal data is recorded in the personal data processing register, in accordance with internal procedures;
- ▶ Inform our employees on how the personal data they have given us is used;

- ▶ Guarantee employees' right to privacy notably by not transmitting their information to unauthorized persons and ensuring personal data are kept securely;
- ▶ Request that all inaccurate or incomplete data must be completed or removed;
- ▶ In the event of subcontracting, ensure that services providers respect these same principles.

#### I must not do:

- ▶ Collect personal information that does not match a specific and necessary use;
- ▶ Communicate people's personal data to any unauthorized third parties, whether internal or external, without their express consent;
- ▶ Store personal data without obtaining a consent.

### EXAMPLE

*As part of my duties, I have access to the personal data of all employees in my area of management. I have not had time to finish my file this evening and have made a copy of the information so that I can get on with my work in transit. Unfortunately, my bag with my laptop and documents was stolen on the train. Should I report it?*

It is imperative you report this theft to your manager as well as to the Director of the Information Security Office who will inform the personal Data Protection Officer (DPO). In addition to the company information contained on your computer, you have copied personal data, which can have serious consequences and cause significant harm to both the bank and its employees. Never copy any personal data whether onto your computer or external device. To ensure the security of personal data, it is essential to respect the internal rules and procedures.

## 7. HEALTH AND SAFETY AT WORK ►

### DEFINITION

Companies must take the necessary steps to ensure the safety and protect the physical and mental health of their employees. These measures notably include implementing a strategy to prevent occupational risks as well as carrying out information campaigns and training sessions.

### THE COMMITMENT

#### OF CRÉDIT AGRICOLE S.A.

Everyone working for or with the Group must be able to achieve their full potential in a safe and secure environment. Crédit Agricole S.A. undertakes to take all necessary measures to ensure the safety and protect the physical and mental health of its employees.

However, safety in the workplace also depends on all of us. All bank 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 acts or omissions at work.

#### I must do:

- Become acquainted with, and respect Crédit Agricole S.A.'s health and safety rules;
- Make sure that your actions and conduct present no risks to you or for other people;
- Contribute to safety and security in the workplace. This includes participating in safety drills and training programmes organized by the bank and reporting any situation that could constitute a risk to security and safety in the workplace to the Human Resources unit.

#### I must not do:

- Ignore Crédit Agricole S.A.'s rules on health and safety at work;
- Withhold information about a situation that could compromise the safety of the work environment.

### EXAMPLES

*I've noticed a change in behavior of a colleague of mine: he seems very stressed, isolates himself, has lunched alone for some time and refuses to discuss anything. It worries me but I don't know what I can do.*

This situation troubles you. It is important you share this information with your manager or Human Resources department, so that they can intervene rapidly, in the interest, and for the good of the person concerned.

*During the last fire drill, I realized that the two people responsible for evacuating my unit were both absent; one colleague didn't know what to do. Should I notify someone?*

During the drill, you noticed a glitch in the drill procedure that could have compromised the safety. You must inform the head of safety and security in writing, so that she/he can rectify the situation and take the necessary measures to ensure the security of all persons in the workplace.

## 8. NON-DISCRIMINATION ►

### INTRODUCTION

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.

### DETAILS

The Bank's Work Regulations define the following discrimination criteria:

- ▶ sex,
- ▶ age,
- ▶ disability,
- ▶ race,
- ▶ religion,
- ▶ nationality,
- ▶ political beliefs,
- ▶ trade union membership,
- ▶ ethnicity,
- ▶ confession,
- ▶ sexual orientation,
- ▶ type of employment (trial period, fixed or indefinite period),
- ▶ working time (full or part-time).

The bank implemented also the Diversity Policy of Credit Agricole Bank Polska S.A.

**According to law, discrimination may be direct:** "the situation in which ... a person is treated less favorably than another is, has been or would have been treated in a comparable situation".

**Or**

**Indirect:** "An apparently neutral provision, criterion or practice that may, for one of the reasons mentioned in the first paragraph, be of particular disadvantage to persons in relation to other persons, unless that provision, criterion or practice is objectively justified by a legitimate aim and that the means to achieve that end are necessary and appropriate".

### THE COMMITMENT

#### OF CRÉDIT AGRICOLE S.A.

Crédit Agricole S.A. is committed to raising the awareness of its executives, managers and employees about issues of non-discrimination. To act in favor of gender equality and diversity is to allow employees to feel they are treated fairly from the moment they join the bank, and throughout their career in the Company. A working environment in which everyone feels respected regardless of their unique character enhances performance and drives motivation.

### I must do:

- ▶ Reject all forms of discrimination against employees, customers, suppliers, services providers and other persons having relations with Crédit Agricole S.A.;
- ▶ Do not accept any practice or behavior that would or could be discriminatory against employees, suppliers, customers, etc.;
- ▶ Help, talk about it and if necessary, consult your manager and HR unit;
- ▶ If you are a manager, be careful to base your decisions on objective criteria and do not have any prejudices.

### I must not do:

- ▶ Treat people differently on the basis of criteria prohibited by law, which places them at a disadvantage compared to others;
- ▶ Contribute to creating a hostile climate that is conducive to discrimination.

### EXAMPLE

*An employee tells me that they want to take a day off to celebrate a religious holiday that does not fall on a public holiday. Can I grant him/her the day off?*

You can grant a holiday leave at the employee's request. The dates of absence must be mutually agreed between the employee and the supervisor and should take into account the need to ensure the proper functioning of the unit. If necessary, you must be able to justify your refusal to accept a request for leave objectively.



## 9. DIVERSITY AND GENDER EQUALITY ►

### DEFINITION

Companies must comply with obligations regarding gender equality and the employment of people with disabilities.

### DETAILS

Companies with 50 employees or more must conclude an agreement on gender equality at work or, failing this, draw up an action plan. 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 an action plan to reduce the discrepancies identified, and to monitor and promote equality in the workplace.

Companies with 20 or more employees are required to employ disabled people in the proportion of 6% of the total workforce of the enterprise on a full-time or part-time basis. If they do not fulfil this obligation, they must pay a contribution to the fund for the integration of disabled people in the workplace.

### THE COMMITMENT

#### OF CRÉDIT AGRICOLE S.A.

In addition to its legal obligations, Crédit Agricole S.A. considers that diversity is a factor that enhances performance and attractiveness. Promoting gender diversity is about creating an open and responsible corporate culture that fosters internal cohesion and progress.

Teams with diverse profiles and talents reflect the Company and enable us to invent new models, better meet the expectations of our customers and as such benefit everyone.

This commitment is reflected in concrete actions, such as promoting women to positions with managerial responsibility and within the management committees, or integrating people with disabilities.

### I must do:

- Be attentive to making an objective judgement focused on skills in all managerial decisions;
- Obtain several different opinions to foster objectivity;
- Ensure that your teams are made up of a balanced proportion of women and men.

### I must not do:

- Make a decision on the basis of non-objective criteria;
- Implement processes that could lead to unequal gender treatment or even discrimination, even though the purpose of these processes was initially intended to resolve inequalities.

## EXAMPLES

*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?*

Above all, base your judgement on the skills of everybody in your team and choose the person best suited to fulfil the duties of the job.

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

It is essential to remember that a person's skills are the only factor to be taken into account when recruiting. As a manager, if you have any concerns about the successful integration of this new employee into your team, do not hesitate to ask

HR. If necessary, actions can be implemented, with the support of the HR, to ensure that the employee's integration into the team is carried out in the best possible way.

# 10. THE FIGHT AGAINST MOBBING ►

## INTRODUCTION

The law punishes the mobbing, the purpose or effect of which is to cause a deterioration in working conditions, and which may infringe upon their rights and dignity, impair their physical or mental health, or compromise their professional future.

## DETAILS

Moral harassment can take several forms:

- Derogatory remarks;
- Humiliation or bullying;
- Insults.

Sexual harassment is understood as any undesirable behavior of a sexual nature towards a natural person or relating to gender, the purpose or effect of which is to violate the dignity of that person, in particular by creating an intimidating, hostile, degrading, humiliating or offensive environment towards them.

This behavior may consist of physical, verbal or non-verbal elements.

## THE COMMITMENT

### OF CRÉDIT AGRICOLE S.A.

Crédit Agricole S.A. is committed to ensuring the prevention, detection and elimination of mobbing.

Any employee or representative trade union organization may submit a complaint in writing or to a dedicated e-mail box - in accordance with the Anti-Mobbing Policy of Credit Agricole Bank Polska S.A.

Actions or behaviors bearing signs of mobbing are not accepted by the Bank. No employee or person undergoing an internship or training may be treated in a way bearing the hallmarks of mobbing.

## I must do:

- Become acquainted with the bank internal policies and procedures to respond appropriately;
- Inform HR department if you become aware of a case of harassment.

## I must not do:

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

## EXAMPLES

*A colleague is criticized in a humiliating way about his/her actions in front of the rest of the team. His/her work is automatically being called into question and he/she is being reprimanded without any verification of the performance of their tasks. He/she is taking more and more time off for sick leave.*

Remind everyone that relationships in the workplace must be fair and respectful. If necessary, quickly get in touch with your manager or HR unit so that they can take action rapidly to put an end to this situation of harassment.

*A colleague is particularly intimidating and humiliating. He/she frequently makes sexual innuendos towards me and make inappropriate gestures. Despite my insistence that they stop this behavior, he/she keeps pestering me for a date.*

Report it to your manager or HR contact in order to alert them to this unacceptable behavior. You can also ask the Anti-mobbing Ombudsman to provide you with support.

# 11. EXTRA-PROFESSIONAL ACTIVITIES ►

## INTRODUCTION

An extra-professional activity is an activity that you undertake outside your working hours. The concept of pluriactivity can be defined as the simultaneous exercise by the same person of two or more activities of a professional, trade union or political nature.

## DETAILS

The provision of work under an employment contract does not preclude running an independent activity at the same time. Therefore, the employee may, for example, lead social activities (non-profit association). In each case of undertaking additional activities, the opinion of the Compliance Department is required.

However, while the principle of freedom to choose a profession applies, employees must respect a professional code of ethics with respect to their employers. Indeed, for the duration of their employment contract, employees are bound by an obligation of loyalty to their employer. In general, this obligation involves taking care not to tarnish the reputation or prevent the proper functioning of the bank, notably by committing acts of disparagement or undertaking competitive practices that would be against the interest of the bank.

### I must do:

- Inform your manager beforehand if you're contemplating exercising a remunerated activity outside your working hours;
- Obtain the consent of the supervisor and the Compliance Department before starting additional work, in accordance with the Code of Ethics;
- Respect the obligation of confidentiality, professional secrecy and trade secrets;
- Be well acquainted with the terms of your employment contract in order to ensure that it is properly applied. If necessary, ask the HR unit to explain it to you.

### I must not do:

- Exercise an activity competitive to the activities of the bank during the term of your employment contract (including using leave to perform paid work or training in an additional workplace);
- Perform an extra-professional activity in addition to your professional activity, that could prevent you from achieving the objectives defined in the context of your salaried activity, or generate conflicts of interests;
- Exercise your extra-professional activity during the working hours defined in your contract;
- Use the equipment and resources put at your disposal within the context of your work for your extra-professional activities.

## EXAMPLE

*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 equipment or any other bank-owned resources for the purposes of any extra-professional activity.

## 12. APPROACH TO ENVIRONMENTAL PROTECTION ►

### DEFINITION

The European Commission defines Corporate Social Responsibility (CSR) as the voluntary integration by enterprises of social and environmental issues in the conduct of their operations and relations with stakeholders.

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

### DETAILS

To contribute to sustainable development goals, companies should:

- Take into account stakeholders' expectations;
- Fully comply with legal requirements;
- Integrate this responsibility across the organization and implement it in all internal and external relations.

### THE COMMITMENT

#### OF CRÉDIT AGRICOLE S.A.

Crédit Agricole S.A. intends to be a committed player in a fair climate transition. While economic growth brings progress and social inclusion, greenhouse gas emissions intensify climate change and social injustice over time. The challenge is therefore to successfully decouple economic growth from the production of greenhouse gas emissions. Crédit Agricole S.A. wishes to accompany this metamorphosis and integrate the issue of climate and social cohesion into its businesses.

#### A climate strategy based on a scientific approach:

- P9XCA, one of the leading methodologies for measuring Scope 3 (indirect emissions);
- Implementation of a climate strategy certified by an independent third-party organization;
- Appropriate, tailored management of climate-related issues.

#### Greening of the balance sheets of the Group's entities:

- The first bank in the world to announce a phase-out of thermal coal financing by 2030 for EU and OECD countries and by 2040 for the rest of the world;
- World leader in green bonds;
- Crédit Agricole Leasing & Factoring (CAL&F) finances 1 in 4 renewable energy projects in France.

#### Measures to reduce our operational footprint:

- by reducing its energy consumption and direct carbon footprint;

*Example: The initiatives carried out within the various entities have borne fruit since GHG scope 1 (direct emissions) and scope 2 (indirect emissions linked to energy) have decreased by 3% and 8% respectively between 2016 and 2019;*

- by reducing the amount of waste produced by its buildings;
- by incorporating environmental requirements into its supplier-selection criteria;
- by education about environmental topics

#### Integrating the challenges of the energy transition into relations with customers:

- Creation of a tool that will support corporate clients in transformation;
- Support for start-ups and innovative SMEs that introduce innovations in the field of environmental protection;
- Developing an offer of products and services that take into account environmental issues.

#### I must do:

- Be involved and take into consideration the impacts of my work and projects on the environment;
- Engage in the Group's activities that support the climate transformation and have a positive impact on creating a sustainable economy (pay attention to this especially when talking to clients and stakeholders or when representing the company outside).

#### I must not do:

- Ignore the Group's objectives and commitments on climate transition;
- Take the position that Crédit Agricole S.A. is not involved in environmental issues..



## 12. APPROACH TO ENVIRONMENTAL PROTECTION ►

### EXAMPLES

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

You can reply by saying that the Group's commitment to the environment goes beyond compliance with the law and regulations: our environmental and Corporate Social Responsibility policies drive performance and enhance corporate identity. In addition to the positive impacts generated for stakeholders, the reduction in raw material consumption significantly reduces our costs. Taking environmental risks into account in advance helps reduce our risks. In addition, financing the energy transition is a source of development for future activities.

*I do not understand why we, as a bank, should be concerned with the environment. We are not an industrial company with factories.*

As a key player in the banking sector, we have a duty as leader to serve as a role model. Our decisions can direct industrial projects towards less polluting and even environmentally friendly technologies. Our operations (namely, the construction and operation of our buildings, employee business travel, the impacts of our IT System and waste-sorting activity) can still be improved in order to reduce our environmental footprint. Our environmental policy is fully integrated into all our activities and businesses. It fosters innovation to serve our customers.

## 13. CONTRIBUTION TO THE REGIONS ►

### INTRODUCTION

Since Crédit Agricole is more than ever committed to promoting its cooperative and mutual company values, it contributes every day to the development of the regions by supporting their dynamism and working for more shared economic development.

### THE COMMITMENT OF CRÉDIT AGRICOLE S.A.

Crédit Agricole Group's raison d'être places our usefulness to our customers on the same level as our usefulness to society. By participating in local life and social development, supporting local entrepreneurship, allocating savings to activities that have a positive impact on the local area, improving educational conditions, Crédit Agricole S.A. allows and promotes employee support in a wide range of economic, social and cultural development initiatives.

Its commitment also takes the form of actions to prevent situations of fragility or solidarity. Lastly, Crédit Agricole S.A. contributes to development aid, in emerging countries, on topics such as the fight against poverty and exclusion, and provides support in agricultural and rural development.

#### I must do:

- Understand that regional support is an integral part of the Group's culture. Close customer relationships, responsibility and solidarity are the values that should encourage you to contribute to actions designed to improve regional development conditions;
- Automatically take into account local characteristics in your professional activities;
- Work for social cohesion and good living together in the area where I work are carried out, in line with the Group's Raison d'Être.

#### I must not do:

- Involve in actions that do not respect the Group's regional commitments.

### EXAMPLES

*I'm not sure why Crédit Agricole S.A. is concerned by contributing to the regions: I would have thought that was the role of the Regional Banks?*

Two examples show that Crédit Agricole S.A. contributes at its level to the economic development of the regions:

- In December 2020, Crédit Agricole S.A. issued an inaugural €1 billion social bond to support local, sustainable and inclusive growth in the regions. It aims to revitalize regions and reduce social inequalities, in particular by promoting employment, through financing in the regions most severely affected by the crisis.
- some of the purchases that are required for Crédit Agricole S.A.'s operations are sourced from local suppliers.

# CODE OF CONDUCT



## ANTI-CORRUPTION



**Philippe Brassac**

*The long-standing values of our Group: “close customer relationships, responsibility and solidarity” mean that women and men drive our actions and are central to our purpose. Our values and principles require each person to act in an irreproachable manner.*

*We share the belief that these values and principles drive strength and growth. It was with this in mind that the Code of Conduct includes a section on anti-corruption, which defines the rules of good conduct in terms of the fight against corruption and influence peddling, and to underscore our ‘zero tolerance’ rule for the corruption. As such, the Group has obtained ISO 37001 certification for its anticorruption management system. This Code covers selected situations we may face at work and provides the necessary information to assist us in making decisions that are in accordance with applicable laws and regulations, in particular with the French «Sapin II» law. The Code is a supplement to the Group Ethics Charter and you should read both documents together.*

*It concerns all of us, irrespective of our position in the organization or the country where we work, and serves as a reference for our partners (suppliers, customers, etc.).*

*Everybody plays a role in the development of the Group and must respect the Code of Conduct in the field of counteracting corruption.*

*We are counting on you.*

**Philippe Brassac**  
**Chief Executive Officer**  
**Credit Agricole Société Anonyme**



# DETAILS CONCERNING THE APPLICATION OF THE ANTI-CORRUPTION SECTION OF THE CODE OF CONDUCT ►

## WHO DO THE ANTICORRUPTION RULES APPLY TO

The anti-corruption rules contained in this Code applies to everyone, be they directors, executives managers 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 is applicable across the Group and its subsidiaries around the world.

## WHAT ARE THE EMPLOYEES' OBLIGATIONS?

The anti-corruption rules are included in the Work Regulations and are binding. 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 behavior 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 his/her manager. The bank has a whistleblowing procedure in place, which allows anonymous reporting of violations of the law and ethical procedures and standards applicable at the bank, while maintaining whistleblower rights regarding the confidentiality of the report.

## WHAT ARE THE CONSEQUENCES OF INFRINGING THE CODE?

The Bank includes the rules of conduct in the field of counteracting corruption in the Work Regulations. Pursuant to these Regulations, in the event of a breach of the anti-corruption rules, the employee may be subject to professional consequences.

### REMEMBER

Any acts of corruption are subject to disciplinary penalties against employees, in accordance with the provisions of the Work Regulations, as well as penalties specified in applicable laws.

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

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

# 14. THE FIGHT AGAINST CORRUPTION ►

## INTRODUCTION

Corruption is the act of an individual in a specific public or private office who solicits, proposes or accepts a gift, an offer or a promise for the purposes of performing, delaying or omitting to perform an act which is, directly or indirectly, within the sphere of his/her duties.

## DETAILS

The law distinguishes between the crime of active corruption - the corrupting person - and the crime of passive corruption - the corrupted - subject to fines, restriction of liberty and imprisonment.

Active corruption consists in proposing, directly or indirectly, offers, promises, donations, gifts or any benefits to a public administration employee or a private person in order to perform or not to perform an activity belonging to that person's professional duties.

Passive corruption concerns an employee of a public administration or a private person who solicits or accepts, directly or indirectly, offers, promises, donations, gifts or any benefits for himself or for another person in order to perform or not to perform an act belonging to his professional duties.

## THE COMMITMENT

### OF CRÉDIT AGRICOLE S.A.

We employ a zero tolerance policy with regard to corruption including facilitation payments (see specific chapter). No employee may engage in corruption, whatever their form or reason.

Corruption impedes free competition and impairs economic development; it can have very serious financial, commercial and criminal consequences, which could seriously damage the reputation and image of the Group.

Any employee involved in an act of corruption is also liable to disciplinary or even criminal sanctions.

### I must do:

- ▶ If you feel pressure from, or are solicited by a third party, inform your manager, the Fraud Prevention unit and Compliance Department;
- ▶ Act in accordance with the provisions of the Anti-Corruption Policy in terms of accepting/giving gifts and other benefits;
- ▶ Report to the Compliance Department gifts and benefits given or received in excess of PLN 600, or gifts and benefits sent directly to a private address;
- ▶ Respect the applicable procedures for accepting expenses incurred by staff members;
- ▶ Be constantly on the alert and monitor all of your relationships with intermediaries and suppliers;

- ▶ Respect the recruitment procedures defined by the Group;
- ▶ Verify that all payments are documented and properly authorized.

### I must not do:

- ▶ Offer, promise or agree to giving a benefit (financial or otherwise) from 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 or failing to perform a task, give consent under a commercial agreement or carry out any other action in the course of your duties or activities;
- ▶ Favor a third party in calls for tenders;
- ▶ Offer or accept gifts and benefits beyond the limits allowed under the Anti-Corruption Policy;
- ▶ 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.

## EXAMPLES

*One of my suppliers has offered me a weekend by the sea. In exchange, all I need to do is reduce his due payment date by a few weeks. Can I do this?*

It is forbidden to take advantage of your position or duties to receive any gifts or benefits. Immediately alert your manager, the Fraud Prevention unit and Compliance Department, and, if applicable, the Purchasing Office.

*A supplier with whom I very good relations has invited me to a trade show on the exotic island; he also offered to pay part of my trip. What should I do?*

You must decline the offer. To preserve the independence of the Group and its employees, it is not possible to allow a third party to pay for all or part of a trip, even a business one.

*One of my line managers requested that I ask one of our usual outside contractors to hire a member of his family. What should I do?*

Decline the request and report the case to your direct manager.

# 15. FIGHT AGAINST INFLUENCE PEDDLING AND INTERACTION WITH PUBLIC OFFICIALS ▶

## INTRODUCTION

Influence peddling is the unlawful solicitation or acceptance, for oneself or another person, of offers, promises, donations, gifts or any advantage by a person exercising public authority, performing public service or holding a mandate as a result of a general election, and abusing his real or purported to obtain from public authorities or public administration merits, positions, contracts, etc.

## DETAILS

Influence peddling is the act of monetizing a person's real or supposed position or influence in order to influence a decision to be made by a third party.

This involves three parties: the beneficiary (who provides the benefits or makes the donations), the intermediary (who uses the credit he has because of his position) and the target person, 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 offence is treated separately and punished by sanctions regulated in the provisions of the Penal Code.

## THE COMMITMENT

### OF CRÉDIT AGRICOLE S.A.

All employees must adopt business behavior that is in accordance with the anti-corruption laws in force in the countries where the Group is present.

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

## I must do:

- ▶ If pressured or solicited by a public official, alert your manager and the Compliance department;
- ▶ Comply with the procedures for activities involving public officials;
- ▶ Be constantly on the alert and regularly monitor all transactions involving public officials;
- ▶ Ensure that all payments and expenses involving public officials are properly authorized, accounted for and documented.

## I must not do:

- ▶ 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;
- ▶ Favor a relative of a public official within the context of a call for tenders or recruitment process;
- ▶ Give cash to public officials.

## EXAMPLES

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

Refuse and notify your manager and the Compliance Department Director as soon as possible to counteract corruption.

*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 this request, which constitutes an active act of influence peddling. Report this situation to your supervisor and to the Compliance Department.

# 16. FIGHT AGAINST FACILITATION PAYMENTS ▶

## INTRODUCTION

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.

## DETAILS

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 French 'Sapin II' law of 9 December 2016.

## THE COMMITMENT

### OF CRÉDIT AGRICOLE S.A.

Facilitation payments are strictly forbidden. This principle is also included in the Anti-Corruption Policy at Crédit Agricole Bank Polska S.A. Any questions regarding corrupt payments should be directed to the Compliance Department.

### I must do:

- ▶ Consult your manager or the Compliance Department Director if you receive a request for a facilitation payment from a public official;
- ▶ Alert your manager or the Compliance Department Director if, in the context of an exceptional situation, you 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.

### I must not do:

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

## EXAMPLES

*To obtain a permit within the context of a real estate construction programme, an official offers to speed up the authorization process, which usually takes several months, in exchange for a gratuity. Should I pay?*

No, because this is a corrupt act. Inform your manager and Compliance Department Director.

*I have to go on a business trip to a country for which I need a visa. At the embassy, an agent informs me that the time to obtain the visa is longer than I had foreseen. He/she is offering to speed up the process for me if I offer him/her free tickets to a concert by famous artist. What should I do?*

To avoid any act of corruption, decline the offer and immediately inform your manager and Compliance Department Director.



# 17. CONFLICTS OF INTEREST ►

## INTRODUCTION

A conflict of interests occurs when the personal interests of an employee may conflict with those of Crédit Agricole S.A.

In other words, it is a situation in which the personal interests of a bank employee, regardless of the position held, may influence his assessment or decision taken in the performance of professional duties.

Conflicts of interests can be of a personal nature (e.g. such as family ties), professional (such as commercial relations), financial (e.g. as in personal loans) or political (having an influence on the bank).

## THE COMMITMENT OF CRÉDIT AGRICOLE S.A.

Crédit Agricole S.A. has implemented an active conflicts of interest's prevention policy. Conflicts of interests may include acts of bribery or influence peddling and expose the bank and its employees to allegations of bias or dishonesty. They may also have repercussions on the reputation of the Group and its employees.

### I must do:

- Respect the Group's prevention principles and measures notably regarding gifts and benefits, public relations activities and extra-professional activities, to ensure and maintain my independence of judgement;
- Report additional activity in the public sector to your manager and Compliance Department;
- Notify your manager and the Compliance Department of your desire to take up a managerial, administrative or managerial position in any organization, whether profit-making or not-for-profit, and seek prior approval for such a position;
- Inform your manager of any personal or family ties that may have with a third party in relation to the bank;
- Inform your Compliance Department of any potential direct or indirect conflict of interests and abstain to participate in debates or decision-making on the subjects concerned.

### I must not do:

- Make decisions if your 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 interests or situations that could create such a situation;
- Acquire positions of interest in a business of competitor, customer or supplier.

## EXAMPLES

*My manager asked my opinion on selecting a new supplier because he's hesitating between two companies. It turns out that the manager of one of the companies is a childhood friend of mine. How should I react?*

To avoid any conflict of interests, inform your manager in writing about this relationship and withdraw from the selection process.

*My brother is a services provider in a training organization, and the solutions he's offering are competitive and adapted to our needs. Should I say no?*

Report this situation in writing to your manager who will take all measures to prevent possible conflicts of interest and ensure an objective selection process for the service provider.

*I am an employee of Crédit Agricole S.A. with an appointment as a board member in a company in which Crédit Agricole S.A. is a shareholder. What should I do?*

Report the situation to your manager and Compliance Department Director, and do not participate in any discussions and decision-making on matters that could create a conflict of interests. In this situation, conflict of interest management is monitored by the Compliance Department in accordance with the Conflict of Interest Management Policy at Credit Agricole Bank Polska S.A.

## 18. GIFTS AND INVITATIONS ►

### INTRODUCTION

Corporate gifts are those that are offered within the context of business relations. Some may be worth a significant value (trips, electronic equipment, etc.): and are therefore accepting/giving gifts may constitute a corrupt act.

Receiving/giving invitations to business meetings, trainings, seminars, conferences, sports, cultural or social events, among others, may cause a conflict of interest.

### THE COMMITMENT

#### OF CRÉDIT AGRICOLE S.A.

Employees must not accept gifts or invitations, directly or indirectly, which may, even unintentionally, compromise their independence, impartiality or integrity. They must refuse all gifts or invitations that could place them in a conflict of interests. In the same way, it is forbidden to solicit gifts from individuals or companies which either have, or are trying to develop, business relations with the Group.

The admissible one-time value of gifts and benefits accepted or given is PLN 100. The allowable annual value of accepted or given benefits cannot be higher than PLN 600. The rules for accepting / giving gifts and benefits are regulated in the Anti-Corruption Policy at Credit Agricole Bank Polska S.A.

The Crédit Agricole Group does not forbid employees from making or accepting public relations invitations. These are gestures of courtesy and welcome between business partners. However, these public relations must be clearly justified.

#### I must do:

- If you are a manager, make sure that your staff are aware of the rules regarding gifts and invitations, public relations activities and business trips;
- Before accepting a gift or an invitation, ask yourself how this could be perceived publicly and refuse offers that might create a conflict of interests for you;
- Be transparent with your manager to avoid any suspicion;
- Refuse invitations to high-worth events;
- If you accept an invitation, pay the associated travel and accommodation expenses;
- Comply with the internal procedures for registering and claiming gifts and benefits.

#### I must not do:

- Accept or give any gifts or benefits worth more than the authorized fixed amount or receive any of these at your private address, regardless of the amount;
- Solicit any form of gift or benefit for your own account or for that of a third party;
- Receive any form of remuneration from a counterparty, an intermediary, a supplier or a customer, either directly or indirectly;
- Give or receive gifts in cash of any value;
- Offer or accept any public relations events that could damage the Group's image.

### EXAMPLES

*I have been invited by one of our suppliers to a trade show abroad at his/her expense. How should I react?*

All forms of travel, even of a strictly professional nature and paid for by a third company, are forbidden. Decline the offer and explain clearly the reasons why.

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

You can, on the terms set out in the Anti-Corruption Policy at Credit Agricole Bank Polska S.A.

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

Inform your manager whenever you accept/offer a gift or benefit, including if you receive a gift delivered to a private address. Your manager always consults with the Compliance Department about the possibility of accepting/giving such a benefit/gift, if he/she has any doubts in this regard.

# 19. LOBBYING AND FINANCING POLITICAL PARTIES ▶

## INTRODUCTION

Lobbying describes any direct or indirect communication with public officials for the purposes of influencing public decisions. Consulting people representing interests enables the legislator to obtain information about how the law is enforced and how to improve it. It also gives public decision makers greater insight into what civil society expects.

The financing of political parties by legal entities (companies, foundations, etc.) is strictly forbidden.

## THE COMMITMENT

### OF CRÉDIT AGRICOLE S.A.

In cooperation with experts from the Group's different entities, lobbying enables Crédit Agricole to make a positive and significant contribution to public debates at the international, European and national levels on both policy and technical issues. Its purpose is to provide a reasoned view of the impacts of public decisions for the Group and to preserve and/or promote its interests. The Group has set out its commitments in its Responsible Lobbying Charter.

In addition to fully respecting the ban on financing political parties, including in countries where this practice is permitted, the Group insists that all information pertaining to the convictions and political commitments of its employees remain personal, in order never to implicate or jeopardise the Group's reputation. These activities must be carried out outside working hours and outside the Group.

### I must do:

- ▶ Declare your intention about lobbying activities, inside and outside the Group;
- ▶ Declare the offices you hold in various trade associations;
- ▶ Base your arguments on reliable information that has been analyzed and audited at the internal level;
- ▶ Record all organizations on behalf of which you lobby in the register representatives of interests, if one exists;
- ▶ Update the list of appointments you make with public decision makers, for the purposes of influencing public decisions, so that you can draft the annual report of your activities, as required by the law;
- ▶ Declare your elected public offices to your manager and Compliance Department;

- ▶ Make sure that your private opinions and political activities do not affect the Group's commitments;
- ▶ Refuse any solicitation in any form whatsoever that requests your political support and could make the Group liable.

### I must not do:

- ▶ Engage in activities that may be considered corrupt or activities that constitute dishonest or improper practices;
- ▶ Use the resources or funds of the Group to engage it in fund-raising or political support activities.

## EXAMPLES

*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 and Compliance Department Director.

*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. The bank implemented the Sponsorship and Charity Policy, which contains a catalog of unacceptable areas for donations.

## 20. PATRONAGE AND CHARITABLE ACTIONS ►

### INTRODUCTION

Patronage enables companies to make donations to organizations in the form of financial or material support for the purposes of supporting a work of general interest or acquiring a cultural object.

A charitable contribution may take the form of a grant in the form of cash benefits, benefits in kind or the provision of services, transferred to a selected organization for charitable purposes.

### THE COMMITMENT

#### OF CRÉDIT AGRICOLE S.A.

Crédit Agricole S.A. supports charitable actions that contribute to the well-being of the population in areas where the Group operates.

This contribution must comply with Crédit Agricole Group's Ethic Charter. Moreover, the Crédit Agricole Group prioritizes contributions made in countries where it operates and in areas that preserve heritage, solidarity, education, arts, culture and health, etc.

Crédit Agricole Group can also make contributions in cash, in kind or in the form of services in the event of natural disasters or other emergencies. Charitable contributions should never be used to disguise an illegitimate benefit that is intended, or appears to be intended, to influence decision-making.

### I must do:

- Contact the Corporate Communication Office for the list of charities authorized by the bank and select one carefully on the basis of its experience, references and reputation;
- Be mindful of charitable organizations which accounts are published and regularly audited;
- Ensure that all contracts drawn up with the organizations concerned incorporate compliance clauses and make sure you are in a position to verify how these funds are used;
- Ensure that all expenses incurred by charitable organizations have been properly authorized, accounted for and documented.

### I must not do:

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

## EXAMPLES

*A public official contacted me to find out if the Crédit Agricole Group would help finance his wife's charity for underprivileged children. What is the procedure in this case?*

Contact your manager, Corporate Communication Office and Compliance Department Director immediately to assess the situation and define the process to be followed.

*The Crédit Agricole Group has been providing financial support to an environmental charity for several years. Within the context of a control of the use of funds, I noticed that the financial contributions made by the Group had been used to print leaflets, which was not the initial purpose of the Group's support. In addition, the printing company is owned by the sister of the treasurer of the association. What should I do?*

Speak immediately about this to your manager, Corporate Communication Office and Compliance Department Director. Then determine whether or not the financing of this association should be renewed, taking into account the risk of conflict of interests, reputational risk as well as the risk related to the improper use of the funds distributed by the Group.

## 21. SPONSORSHIP ►

### DEFINITION

Sponsoring is a form of marketing whereby the Company assumes all or part of the expenses of a project or programme, in exchange for obtaining visibility on media platforms or events.

### DETAILS

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

### THE COMMITMENT

#### OF CRÉDIT AGRICOLE S.A.

Sponsorship is an integral part of the Crédit Agricole Group's marketing and communication strategy. In addition, to enhance its image, Crédit Agricole S.A. promotes sponsorships related to sports.

Sponsorships must comply with the principles and internal rules of the Group and must never be used to advantage unduly, influence improperly or give the appearance of improperly influencing any person in charge of making decisions.

#### I must do:

- Carefully select the sponsored organization, in the light of its experience and reputation;
- Prefer sponsored organizations whose accounts are published;
- Apply for sponsorship in accordance with the Sponsorship and Charity Policy applicable at the bank;
- Draw up a contract including compliance clauses with the sponsored organization;
- 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.

#### I must not do:

- Agree to sponsor political parties and events;
- Sponsor the activities of organizations that politicians or high government officials and their family members indirectly benefit from or control;
- Sponsor an organization that is related to projects in which the Crédit Agricole Group is involved for commercial purposes.

### EXAMPLES

*As a customer services representative, I was contacted by the treasurer of a group who suggested the Crédit Agricole sponsor a sports event in exchange for a multi-million Euros contract. How should I react?*

Decline the offer because conduct such as this is a form of corruption. Speak immediately to your manager, Corporate Communication Office and Compliance Department Director..

*I read in a newspaper that a sports club sponsored by Crédit Agricole actively participated in fixing matches for a national cup. I am afraid that the name of the Group may be associated with this scandal. How should I react?*

Speak to your manager, Corporate Communication Office and Compliance Department Director immediately to determine the right course of action to take. This situation could have an impact on the reputation of the Group and its employees.



# CODE OF CONDUCT



## PROTECTION AND REPUTATION OF THE GROUP

CRÉDIT AGRICOLE GROUP

## 22. CONFIDENTIALITY ►

### INTRODUCTION

Confidentiality and professional secrecy are the fundamental principles in the banking profession. They must be an ongoing concern for all employees, regardless of the area in which they perform their duties.

### DETAILS

All information relating to customers, as well as to Crédit Agricole S.A., the other entities of the Group (their employees, their customers, and their internal organization), its information systems, its security procedures, its suppliers and its subcontractors, is confidential.

The disclosure of any confidential information makes the establishment and the employee involved liable. When this concerns non-public information of a listed company, a breach of confidentiality may be criminally, administratively and professionally sanctioned.

Banking confidentiality concerns all customer information. This information cannot be revealed outside the bank, nor can it be shared within the bank with people who do not require access to it to perform their duties.

### THE COMMITMENT

#### OF CRÉDIT AGRICOLE S.A.

Crédit Agricole S.A. ensures confidentiality in all circumstances and applies to all types of media. Each employee of Crédit Agricole S.A. is responsible for maintaining the confidentiality of the information it receives. Employees may use this information internally for professional purposes and make disclosures outside the Company only if authorized to do so or in the cases provided for by law.

Group employees must also apply the principle of confidentiality when using social media. They are responsible for their posts on the Internet and social media and must ensure that they do not disseminate information there that they would not pass outside Crédit Agricole S.A. by other means. This principle of confidentiality also applies to business social networks. The bank implemented a procedure regarding communication with the media and the conduct of employees and persons cooperating with the bank on the Internet and social media.

### I must do:

- ▶ Respect the confidentiality principle in the scope of information available to me about clients and about the Group;
- ▶ Always obtain the express written authorization of customers when you need to transmit a piece of confidential information that concerns them;
- ▶ Only share confidential information within bank and the Group, with the persons concerned and solely for the purposes of their duties;
- ▶ Classify email messages according to the level of confidentiality of the information contained therein;
- ▶ Always make sure that a confidentiality agreement exists before sharing confidential information with an external professional;
- ▶ Protect confidential information against unauthorized use and access;
- ▶ If you have any doubts about the information you want to diffuse on the social media, ask your manager, Corporate Communication Office or Compliance Department before any sharing.

### I must not do:

- ▶ Disclose any information about the Group's customers or Crédit Agricole Group to outside parties;
- ▶ Send any confidential information in personal emails;
- ▶ Post on social media or other media any information that could infringe the rights of customers and harm you, the bank or the Crédit Agricole Group.

## EXAMPLES

*I'm using public transport right now and I'm going to take advantage of the time to work while traveling by train, can I do that?*

Laptop screens without privacy filters can be easily read by other passengers. Do not work on confidential documents under such conditions. This also applies for tablets and mobile phones.

*I have to draft the minutes of the Strategic Committee and a colleague offered to help me with the formatting. Can I send it to him/her via work e-mail?*

You must guarantee the confidentiality of this document and limit its circulation. If your colleague did not attend the Strategic Committee meeting, you cannot do this.

## 23. FIGHT AGAINST MONEY LAUNDERING AND THE FINANCING OF TERRORISM ►

### INTRODUCTION

Money laundering and terrorist financing are phenomena of unprecedented scale. They affect our societies in general and the economic development of countries. This enables criminals to infiltrate financial institutions, control certain economic sectors and corrupt management bodies and governments, affect citizens' lives, and affect key principles such as democracy.

### DETAILS

Money laundering is the process of making money, obtained by illicit or criminal means, appear clean. The laundering of illegal funds is also used for the purposes of financing terrorism. Terrorism may also be financed by legal funds used for the purposes of carrying out a terrorist action. This is referred to as "reverse money laundering".

### THE COMMITMENT OF CRÉDIT AGRICOLE S.A.

Crédit Agricole S.A. participates in the fight against money laundering and the financing of terrorism. As such, the bank monitors financial flows in compliance with the law relating to the protection of privacy, fundamental rights and freedoms of individuals, as well as the fight against discrimination and professional secrecy. All employees must participate, at their own level, in ensuring constant vigilance.

Any breach of obligation exposes directors, managers, and employees to civil, criminal, administrative and disciplinary liability. In addition, Credit Agricole Group's image and reputation are at stake.

#### I must do:

- Have up-to-date knowledge in the area of financial security even if you are not directly exposed;
- If you are a manager, do your utmost to ensure that your employees are well informed about these topics;
- Actively implement anti-money laundering and antiterrorist financing procedures;
- Pay particular attention (due diligence) when establishing customer relations (KYC), when opening an account and throughout their entire 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 there is any doubt as to the identities of the originators or the beneficiaries;
- Refer all suspicious transactions to the Compliance Department.

#### I must not do:

- Fail to strictly apply financial security procedures;
- Disclose to a customer or any unauthorized third party that I have anti-money laundering suspicions or concerns about them;
- Advise or assist in any transaction involving the placement, concealment or circulation of money from an illicit source.

### EXAMPLES

*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 risky 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 address 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 should I go about analyzing the transaction?*

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 authorized by our 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.

## 24. FIGHT AGAINST TAX EVASION ►

### INTRODUCTION

Strictly speaking, tax evasion is the act of avoiding or reducing tax by declaring one's taxable wealth or profits in a country that is different from where they should be declared. Tax evasion concerns both companies and individuals that fail to declare their taxes.

In a wider sense, tax evasion involves using various legal means to reduce one's tax burden. This differs from tax fraud, which is an illegal practice.

### DETAILS

Two tax measures, with which Crédit Agricole must comply, were set up to combat tax evasion namely, the Foreign Account Tax Compliance Act (FATCA) and the Automatic Exchange of Information (AEOI):

- ▶ FATCA was introduced to collect information on the assets and income held by US taxpayers («US persons») living outside the United States;
- ▶ AEOI was an initiative of the OECD to carry out multilateral exchanges of information for the purposes of identifying the assets held by tax residents living outside their home jurisdiction.

### THE COMMITMENT

#### OF CRÉDIT AGRICOLE S.A.

Crédit Agricole S.A. considers that a consistent and responsible tax approach is an essential part of its long-term strategy.

Gorup treats any tax issues with integrity and transparency. All operations and transactions carried out are based on an economic reality and Crédit Agricole S.A. does not seek to avoid tax through structures provided for this purpose.

Crédit Agricole S.A. undertakes not to set up or propose financial operations exclusively for tax purposes, or to assist its customers in circumventing their tax obligations or operating in states or territories whose jurisdictions are categorized by the EU as «non-cooperative» (tax havens) or which do not take part in the Automatic Exchange of Information.

### I must do:

- ▶ Respect the laws and regulations in force in the states and territories where we carry out our activities;
- ▶ Remain attentive to, identify and promptly report to the Tax Office any action aimed, directly or indirectly, at circumventing tax rules;
- ▶ Keep your customer knowledge files up to date with information regarding their tax residence (AEOI) and citizenship criterion (FATCA);
- ▶ If in doubt, contact Tax Office or Compliance Department.

### I must not do:

- ▶ Deliberately shield Crédit Agricole S.A. from its tax obligations;
- ▶ Advise a customer and/or participate in a financial arrangement aimed at circumventing tax rules;
- ▶ Sign any self-certifications on behalf of your customers;
- ▶ Remove or conceal any information for the purposes of covering up any evidence of an operation being linked to a tax haven.

### EXAMPLE

*I live in a France and have a dual French-American citizenship. I don't think I should be considered a US citizen.*

As you have a dual citizenship, you are considered a "U.S. Person" with the obligation attached thereto. Unlike most other jurisdictions, liability to US taxation is linked to citizenship not place of residence. This means that you should provide the bank with a tax residency statement along with the TIN of that residence. The premises indicate American (citizenship) and French (residence) residency.

## 25. INTERNATIONAL SANCTIONS ►

### INTRODUCTION

International sanctions are measures taken by one or more states against natural and/or legal persons (for example freezing assets) and against countries or governments (embargo measures). Sanctions are taken to combat terrorism, nuclear proliferation activities and human rights violations.

### DETAILS

Most of the international sanctions applicable at the level of Crédit Agricole Group are issued, administered or enforced by the UN Security Council, the European Union, France and the United States, as well as by competent local authorities where the Group operates.

### THE COMMITMENT

#### OF CRÉDIT AGRICOLE S.A.

Crédit Agricole S.A. strives to ensure strict compliance with the law on international sanctions, which can be complex and of extraterritorial scope in countries and territories where the Group carries out its activities. Compliance with these requirements is ensured through the strengthening of internal procedures and of programmes ensuring compliance with the law on international sanctions. These are applicable to all Group employees, regardless of the country and the size of their entity, and extend even beyond purely bank activities. Crédit Agricole S.A. does not tolerate any activities that breach international sanctions.

#### I must do:

- Become well acquainted with the Group's internal policies and procedures;
- Complete the mandatory international sanctions training;
- Remain attentive to, identify and promptly report to the Compliance Department Director any violation or attempted violation of international sanctions, as well as any action taken, directly or indirectly, to circumvent them;
- Keep your customer knowledge files up to date and complete (KYC);
- Monitor the compliance of financial operations with international sanctions;
- If in doubt, contact your Compliance Department Director.

#### I must not do:

- Participate in any complex and incomprehensible financial operation;
- 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.

### EXAMPLE

*I have dual French-American nationality and 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. As such, wherever you work, you must inform the HR of your status and get acquainted with the procedure applicable at the bank regarding the rules for identifying persons working for the Bank who have the status of an American Person.



## 26. PREVENTION OF FRAUD ►

### INTRODUCTION

Fraud is an intentional act that is carried out for the purposes of obtaining a material or intangible benefit, to the detriment of a third person or organization.

In the case of the infringement of laws, regulations or internal rules, fraud is characterized by the infringements of the rights of another person and the concealment of all or part of the activities or their characteristics.

### DETAILS

Two types of fraud exist depending on the origin of the malicious parties involved:

- ▶ external fraud: an act carried out by individuals, on their own or in a group for the purposes of obtaining funds, documents or information they can use for their own benefit and to the detriment of a company, its customers or third parties;
- ▶ internal fraud: a malicious act carried out by an employee to the detriment of their company or of interests of any third parties managed by the company. Fraud can also be characterized by a malicious act carried out by an employee with the complicity of individuals outside the company. This is referred to as mixed fraud.

### THE COMMITMENT

#### OF CRÉDIT AGRICOLE S.A.

Crédit Agricole S.A. places great importance on the prevention of fraud, which uses a growing number of techniques that are becoming increasingly more sophisticated, particularly in the light of the digital transformation.

To combat the surge in the number of cases of fraud, it is essential to tackle the issue at both the upstream and downstream levels. All employees, whatever their duties, have a role to play in fraud prevention. Thanks to the daily vigilance of everyone in the Group we can prevent and detect attempts at fraud..

#### I must do:

- ▶ Be well acquainted with the law and best practice concerning fraud prevention, and apply them responsibly with constant vigilance;
- ▶ If you suspect anything fraudulent or are in doubt, immediately alert your manager and the Fraud Prevention unit so that they can act quickly;
- ▶ If you have any doubts as to the identity of the sender of an email, forward the email to Information Security Office;
- ▶ If you are a manager, you should evaluate the risk of fraud attached to your activities, and enforce the principles of good conduct;

- ▶ Perform fraud-risk analysis at the start of the design process for all new products and activities;
- ▶ Respect the principle of segregation of duties, whereby those carrying out or executing an operation cannot approve or settle it.

#### I must not do:

- ▶ Communicate your passwords to anyone, lend your access badge, or leave confidential information or documents on your desk;
- ▶ Open emails or attachments from an unknown sender;
- ▶ Discuss sensitive issues that could involve the Crédit Agricole Group in public places;
- ▶ Use external supports (external hard drives or USB sticks) without taking precautions.

### EXAMPLES

*I've just received an email with an attachment from an unknown address. Can I open it?*

To limit the risk of phishing and being infected by spyware, never open any email if you do not know the sender. If in doubt, transfer the email to your Information Security Office to perform the necessary checks.

*A friend lent me his USB stick containing interesting articles. Can I use it at my place of work?*

This could create computer security problems. As such, you must first make sure that the USB stick contains no viruses that could infect the information system.

## 27. PREVENTION OF MARKET ABUSE ►

### INTRODUCTION

Insider trading, share price manipulation and the dissemination of false or misleading information are all examples of market abuse. The fight against market abuse means preserving the integrity and transparency of markets as well as public trust. As such, it is the responsibility of everyone to respect the principle of equality of information between investors.

In the event of a breach of these rules, the investment services provider and the natural persons placed under its authority may be subject to disciplinary, pecuniary, civil and criminal penalties.

### DETAILS

Information which (i) is not made public, (ii) is specific, (iii) relates to a listed company or a listed financial instrument and (iv) is likely to influence its price or that of related financial instruments is said to be inside information. It can also be communicated in writing or by orally, or simply deduced. Using, transmitting and recommending this information for one's own account or for that of a third party constitute acts of insider dealing and, as such, are strictly prohibited and severely sanctioned.

### THE COMMITMENT

#### OF CRÉDIT AGRICOLE S.A.

The Crédit Agricole Group has implemented a system of 'information barriers' to protect insider information. These provisions consist of subjecting the persons having access to it to the insider information framework.

The barriers also ensure that exchanges between people with access and those who do not have access are watertight, in particular by physically separating of people carrying out sensitive activities or duties.

#### I must do:

- Be attentive and take all necessary measures to avoid disclosing any insider information. This means respecting the information barriers in place;
- If you are on an insider list, you must abide by the associated abstention obligations;
- If you think you are in possession of insider information, tell your manager who will inform the Compliance Department Director;
- Immediately report any suspected market abuse operations to the Compliance Department, which, after carrying out the analysis, will assess the legitimacy or otherwise of the notification to the General Inspector of Financial Information (GIIF);

- Preserve the confidential nature of any suspicious transaction declarations and, as such, do not communicate with those suspected of having committed market abuse, proven or otherwise.

#### I must not do:

- Use insider information when acquiring or transferring instruments, contracts, or financial or stock market securities to which this information relates, whether for your own account, or on behalf of Crédit Agricole S.A. or that of a third party;
- Communicate insider information to a third party outside the normal scope of your duties, to persons outside Crédit Agricole S.A., or to employees who are not authorized to access such information;
- Recommend taking positions on a security based on insider information to any third party (employee of the entity or another group entity, or an external third party, etc.).

### EXAMPLES

*During the morning coffee break, I overheard someone talking about a listed company that is planning to take over another listed company. After checking it out, I found out that this information had not at that time been made public. Can I carry out a financial transaction on this, even if the information has not been given to me directly and distinctly?*

No. The regulator (KNF) considers a person having access to confidential information to be any person who has confidential inside information obtained in the course of performing duties, performing a profession or in any other way.

*I am in 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 somewhere private before discussing it: this will limit the risk of disclosing possibly privileged information that could be overheard by an unauthorized person.

## 28. USING SOCIAL MEDIA ►

### INTRODUCTION

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.

### DETAILS

Social media (social networks, blogs, forums etc.) are now part of our everyday life and concern all Crédit Agricole S.A. personnel, at both the personal and professional levels. However, they present risks and, given the number of different media platforms and the volume of information exchanged on them, controlling this form of communication has become a real challenge.

### THE COMMITMENT

#### OF CRÉDIT AGRICOLE S.A.

Crédit Agricole S.A.'s strategy is to be present on many of these social media networks (Twitter, Facebook, LinkedIn, etc.), so that it can interact with, and respond to customer and stakeholder requests, while taking note of any remarks made about the Group and its services.

Except in cases of abuse, all Crédit Agricole S.A. employees enjoy freedom of expression both inside and outside the Company. Nevertheless, everyone must act responsibly by behaving in an appropriate manner and adopting best practices. Employees may use the social networks for private purposes at their workstation provided they do not abuse this privilege but use it properly, on an ad hoc basis, and without over-stepping their right to freedom of expression to the detriment of the bank and workplace colleagues.

#### I must do:

- Respect the rules of confidentiality and banking secrecy to which you are bound by professional obligation;
- Be aware of the general conditions of use about how your personal data and the information you put online may be used;
- Pay particular attention to social media networks whose servers are hosted in a foreign country, which may have different personal data protection rules than those in European Union;
- Check your settings functionalities to ensure the confidentiality of your profile and comments;
- Specify that your remarks are your sole responsibility and express your personal opinion;

- Do not intervene directly if you read any negative or slanderous comments about the Group so as to avoid giving the authors more visibility. When you come across such comments, forward them to the Corporate Communication Office;
- If in doubt about the nature of the information, hold back and ask your manager.

#### I must not do:

- Carry out your business activity on the social media without having obtained authorization from your manager;
- Express yourself officially on behalf of Crédit Agricole S.A. if you are not a spokesperson appointed by the Management Board;
- Make any remarks that could harm your position, the bank or Crédit Agricole Group and its employees;
- Make statements that are critical, insulting, slanderous, defamatory or reveal confidential information;
- Use information that is protected by the bank and the Crédit Agricole Group copyright without having obtained prior written consent from the Corporate Communications Office.

### EXAMPLES

*I took some pictures at the farewell drinks party of one of my colleagues, and would like to publish them on my personal page as a souvenir.*

To respect the right to the protection of one's image, ask prior authorization from the people concerned. For any publication, you must assess whether there is a risk that it could harm your reputation or that of any other natural or legal persons. .

*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: Crédit Agricole S.A. does not permit its employees to exercise their business activity on the social networks, unless in very exceptional cases. Instead, suggest you create on a shared bank platform in order to facilitate your collaboration.

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

You can present your duties and the activity of the Company in general overview but do not share any confidential information or mention any of your confidential duties.



## CA24:

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► Website

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