



CODE OF ETHICAL STANDARDS

for Business Partners



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www.credit-agricole.pl
Credit Agricole Bank Polska S.A.



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FROM PRESIDENT OF THE MANAGEMENT BOARD



Dear Partners!

At our bank, we always treat each of our customers, each of you - our partners - and each of our staff in an individual and tailored way. We offer solutions best suited to our customers' needs, we support the development of our staff, and create a unique value by working with you. In our operations, we focus on speed, transparency, and security; we are highly committed and supportive. These are the values that guide us in our day-to-day work.

It is our moral duty to observe the principles of ethics. It is extremely important for us to know that you, as our partners, share our values. Therefore, we have prepared this Code. It describes ways to build relations in a responsible way. We believe that by following the principles described below, together, we can have a positive impact on our environment. Sticking to the standards described in this Code will add a new quality to our business relations to the benefit of both sides.

Thank you in advance for reading the Code

A handwritten signature in blue ink, consisting of a large 'P' followed by a series of loops and a long horizontal stroke at the end.

***Piotr Kwiatkowski
President of the Management Board
Credit Agricole Bank Polska S.A.***

HOW WE OPERATE

Being an institution of public trust, we ensure that our business is compliant with applicable laws and regulations. We adhere to the best standards and practices, including good practices for the banking sector and recommendations from regulators.

Our key principles and values are described in the Code of Ethics of Credit Agricole Bank Polska S.A. ('Code of Ethics') and the Charter of Ethics and Code of Conduct of the Crédit Agricole Group. Combined, they reflect our coherent approach to ethical conduct, applicable to all our staff, including members of the governing bodies of our bank.

This Code of Ethical Standards for Business Partners ('Code') is addressed to you. As our business partners from outside the Crédit Agricole Group, you supply goods and services or are involved in providing banking and related services as our agents or brokers.



WHAT IS THE PURPOSE OF THIS CODE

We have written this Code to share with you our key principles and values that guide us in our internal relations and in relations with third parties. The provisions of this Code are consistent with those of our Code of Ethics.

It is important for us to ensure that our relations are based not only on partnership and trust, but first of all on a shared system of moral values and ethical standards. We expect you to treat this Code as guidelines for ethical conduct both in relations with us and in relations with others you have business relationships with.



WHAT SHOULD WE BE GUIDED BY IN BUSINESS

Doing business in a responsible way

One of the values of the Crédit Agricole Group we belong to is to do business in a responsible way. This means that in our business operations we take into account the needs and expectations of our stakeholders, including our customers, staff, business partners, local communities, and the natural environment. We conduct our business in an ethical and responsible way, in compliance with the principles of sustainable development.

We comply with relevant ethical standards, fair competition rules, and with human rights and employee rights laws. We care about our local communities and the natural environment. As a socially responsible bank, we are aware of how our decisions and operations (services, processes) affect our communities and the natural environment. We also take responsibility for the consequences.

We believe in responsible business being based on such values as:



speed



transparency



security



**care
and engagement**

We follow these values when deciding what is important, good and appropriate at our bank. We are guided by them not only when interacting with our customers and with you, our partners, but also in our day-to-day work within our organisation. These values are the foundation of our bank's corporate social responsibility. By sticking to these values we ensure compliance with the principles of sustainable development.

WHAT SHOULD WE BE GUIDED BY IN BUSINESS

Values we would like to share with you

We are convinced that we can do business together in a responsible way only if our relations are based on transparent, fair, and ethical conduct. Therefore we expect you to apply the same principles we do. And the principles are as follows:

- ▶ **to do business in a fair way**, which means to comply with applicable laws and regulations, including, among other things, those governing competition and consumer protection, labour practices, intellectual property, prevention of corruption, and personal data protection, as well as with generally accepted social and ethical standards;
- ▶ **to carry out your duties, to us and to other entities**, with particular diligence, in a fair, loyal, professional, responsible, and reliable way;
- ▶ **to respect human rights as well as employee rights**, which means to respect the dignity and privacy of individuals, have respect for diversity, apply the principle of equal treatment of men and women, including in matters of employment, comply with OHS rules, apply best healthcare practices, prevent discrimination in any form, respect the prohibition on forced labour and corporal punishment, as well as the prohibition on employing children below 16 years of age;
- ▶ **to foster a good, i.e. warm and friendly, atmosphere in the workplace**, based on ethical principles and good manners, conducive to good performance;
- ▶ **to reduce the negative impact of your business operations on the natural environment and the climate**, promote and support attitudes and initiatives supporting environmental protection, and use best available technology (BAT) for the services and solutions provided;
- ▶ **to cooperate where possible with organisations that improve the wellbeing of local communities**, engage in initiatives that address this goal and in charitable activities for the benefit of local communities, including by encouraging your and your business partners' staff to get involved in such activities.



HOW TO PREVENT MISCONDUCT

We are building our reputation as a solid and responsible partner who enters into business relations in a transparent and reliable way. In doing that, we use mechanism designed to prevent and address misconduct. We define misconduct as any action or omission to act which is in breach of the law or the bank's policies, rules or standards.

Prevention of corruption

We have an internal anti-corruption policy at the bank. We consider corruption in any form and any manifestations of corruption to be unacceptable and impermissible. All our staff undertake not to accept and not to offer any inducements, whether in tangible or intangible form, and to avoid any other behaviour that could compromise their impartiality or independence as the bank's employees. Prevention of corruption in any form is of key importance to us. It is important for us to ensure that we do business in a reliable and transparent way, and that our relations with you are based on mutual trust. Our anti-corruption standards are described in the Code of Conduct of the Crédit Agricole Group.

Principles we would like to share with you

We expect you to prevent corruption, by applying the same principles we do. This means that we expect you:

- ▶ **not to seek any inducements, tangible or intangible**, from our staff and customers, as well as from any other entities you have or intend to have business relations with;
- ▶ **not to offer any inducements**, whether tangible or personal, to our employees regardless of their professional roles and responsibilities, in particular in order to influence their actions or decisions, for example with regard to the terms and conditions of our business relation with you;
- ▶ **to effectively prevent and address corruption in any form**, both active (where someone offers and gives inducements, uses bribery) and passive (when someone demands and accepts inducements);
- ▶ **not to offer or promise any financial or personal inducements to individuals in public roles**, to political parties or candidates for political parties, in particular in order to be allowed or continue to be allowed to conduct business in a given country or to gain competitive advantage;
- ▶ **to refuse to accept and not to offer or give inducements in any form** in business relations, where such an inducement would cause a conflict of interests, regardless of the form and value of such an inducement.

In our business relationship, you are allowed to accept or give small token gifts, such as advertising or promotional items. However, such gifts must be appropriate and reasonable, in line with usual business practice, e.g. gifts offered at gala dinners or on the occasion of Christmas. A token gift given or accepted does not require reciprocity. In no case may such a gift affect the independence, impartiality, integrity, or judgment of the person who receives it. It may not be given in breach of applicable laws and regulations, including in particular anti-corruption laws.

Both you and us should take appropriate steps and measures as needed to ensure that nobody uses our business for money laundering or terrorist financing.

Preventing conflicts of interest

In our operations, we make all efforts to prevent conflicts of interest. This also applies to our relations with partners, including the way we choose proposals. It is important for us to ensure that our staff behave in a professional and impartial way and make decisions without being influenced by external factors. We enter into relationships with our partners based on objective criteria and our internal rules. We care about our reputation and interests, and the best interests of our customers. Any situation that can be seen as a conflict of interest may adversely affect our reputation, and even harm the interests of our customers.

Principles we would like to share with you

Therefore, we expect you:

- ▶ to avoid any situations that can result in an actual or potential conflict between our and our customers' interests and your interests, which means that we expect you to refrain from any actions that could give rise to an argument that any business decision to execute an agreement for a bank product or service with a prospective customer has been influenced by factors other than our and our customers' interests;
- ▶ to eliminate any sources of conflicts of interest identified in your business operations, including the relationship with us;
- ▶ to adhere to high ethical standards in your business relations and to avoid getting involved in any activity that may appear to be inappropriate or create a conflict of interests;
- ▶ to select your business partners in a careful and transparent way based on appropriate and objective selection criteria.

Fair competition

In relations with our competitors, we are guided by the principles of reliability, loyalty, corporate culture, mutual trust, and fair competition. We respect the reputation of other entities. It is important for us to co-create a market where all competing entities have equal opportunities and can compete for customers on brand, services and products offered and their quality.

Principles we would like to share with you

We expect you to share our principles and to refrain from any anti-competitive practices. For example, we expect you not to get involved in any impermissible anti-competitive arrangements, such as price fixing and abuse of dominant market position.

OPERATION OF THIS CODE

We conduct our business in a fair and responsible way. We expect the same attitude from you. We request that you, our business partners, comply with this Code and ensure that your staff know its principles. We further request that you promote the values and standards described in this Code also in relations with others as part of supply chains.

If you materially breach this Code, especially our anti-corruption policy, we may immediately terminate our contract with you or assert claims against you.

If you notice that our staff breach any of the principles or standards of conduct set out in this Code, please immediately report it to us. Please send your application by e-mail to:

Zespol_Compliance@credit-agricole.pl



You can also anonymously report any breach of the law, internal regulations or ethical standards (whistleblowing). For this purpose you have at your disposal system available at:

<https://www.bkms-system.com/bkwebanon/report/clientInfo?cin=3CAgr18&c=-1&language=eng>



HOW YOU CAN CONTACT US

For any questions about this Code, please contact our staff member responsible for matters relating to our business relationship with you. You will find their email address in the cooperation agreement.

This Code and the Code of Ethics are available on our website, under the 'Socially responsible bank' tab, at:

<https://www.credit-agricole.pl/o-banku/english-info>



Please send any questions you may have about how we pursue our corporate social responsibility and sustainable development strategy to:

CorporateSustainability@credit-agricole.pl



CA24:

► **Telephone**

19 019

Call charges may vary depending on your service provider

► **Website**

www.credit-agricole.pl



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