

DECLARATION ON MODERN SLAVERY AND HUMAN TRAFFICKING

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

It describes the measures taken by Crédit Agricole S.A. in the year ended 31 December 2022 to prevent the risks of modern slavery and human trafficking in its business activities and supplier relationships.

The Crédit Agricole S.A. subsidiaries operating business activities in the United Kingdom also publish a statement describing their efforts to combat modern slavery, in accordance with section 54 of the Modern Slavery Act 2015. They describe the measures taken to prevent the risks of modern slavery and human trafficking in their activities, including with regard to funding and investment.

OUR GROUP, OUR BUSINESS ACTIVITIES AND OUR SUPPLY CHAIN

The Crédit Agricole Group has banking and insurance activities in 47 countries, 53 million customers across the world, 11.2 million mutual shareholders and 7.3% individual shareholders. The Group has 147,000 employees in France and abroad. Its social and environmental commitments are an integral part of its involvement in the investment and business transformation projects undertaken by its customers, which include multinational groups, SMEs, farmers, tradespeople, NGOs, municipalities and consumers.

In the course of its business, the Crédit Agricole Group purchases goods and services from suppliers, which themselves may use subcontractors. In 2021, our purchases totalled €6.1 billion, most of which were of goods and services in the following categories: real estate, IT, intellectual services, general goods and services, and communication.

OUR COMMITMENTS

On the strength of its cooperative and mutualist identity and longstanding commitments, the Crédit Agricole Group defined its *raison d'être* in 2019 as "Working every day in the interest of our customers and society". It is on this basis and in aspiring to embed its social utility in all its activities, business lines and processes that the Group builds on its strategy; in turn, this strategy guides the action it takes by means of three flagship projects: the Customer Project, the Human Project and the Societal Project¹. This *raison d'être* reflects our desire to build our strategy and objectives around the fundamental principles we adhere to, which are:

- the United Nations' Universal Declaration of Human Rights of 1948
- the 10 principles of the UN Global Compact, since 2003
- the Equator Principles, since 2003
- the Principles for Responsible Investment (PRI), since 2006
- the UN Guiding Principles on Business and Human Rights approved by the Human Rights Council in 2011
- the United Nations Sustainable Development Goals, since 2015
- the OECD Guidelines for Multinational Enterprises
- the conventions of the International Labour Organization and performance standards of the International Finance Corporation (IFC)
- the Principles for Responsible Banking (PRB), since 2019.

OUR POLICIES

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

¹ Our vision | Crédit Agricole (credit-agricole.com)

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

- The **Code of Conduct** prepared by each Crédit Agricole S.A. entity in order to implement the principles laid down in the Group's Ethics Charter. The Crédit Agricole S.A. Code of Conduct has been in effect since September 2018, after being approved by the Board of Directors on 14 May 2018 and submitted to staff representative bodies in June 2018; it was updated in 2021.

- The **Diversity Charter**, which since 2008 has endeavoured to reflect the Crédit Agricole S.A. Group's commitment to cultural, ethical and social diversity in the workplace and to prevent all forms of discrimination.

- The **International Framework Agreement** on fundamental human rights and trade union rights signed between Crédit Agricole S.A. and UNI Global Union, the global union federation for the private services sector, in July 2019.

- The **Responsible Purchasing Policy** and **Responsible Purchasing Charter**, which seek to rise to the challenges of the future and contribute to the company's overall performance. The policy has five objectives: ensure responsible behaviour in our supplier relations, contribute to efforts to make the ecosystem more economically competitive, incorporate environmental and social aspects into Crédit Agricole S.A.'s purchasing activities, improve the quality of our supplier relations in the long run, and ensure the policy is incorporated into existing governance procedures.

- A **Responsible Purchasing Charter** appended to all supplier contracts and based on reciprocal commitments which have been built on the fundamental principles of the United Nations Global Compact. Since 2018, supplier contracts have included a clause covering respect for human rights, environmental conservation and anti-corruption efforts. The procedures governing dialogue with stakeholders include satisfaction surveys to gather feedback from our suppliers as well as our internal procurement managers; annual meetings held with suppliers; regular business reviews carried out with our main suppliers; and a dedicated newsletter (LINK) which is sent to them every six months.

- **Sector policies**, which set out the social and environmental criteria that apply to lending and investment activities and which include aspects relating to respect for human rights. For each sector covered, a reference framework is established and analytical criteria are defined with which to evaluate transactions and identify projects and transactions in which the Group does not wish to be involved.

These documents are available on our website [Our sector policies | Crédit Agricole \(credit-agricole.com\)](https://www.credit-agricole.com/en/our-sector-policies).

MANAGEMENT OF MODERN SLAVERY AND HUMAN TRAFFICKING RISK

Our policies come with action plans and operating processes that are implemented within each entity to manage the risk of modern slavery and human trafficking in our activities and supplier relationships. The approach to risk assessment differs depending on the parties and activities concerned.

Risk prevention at Crédit Agricole S.A. focuses on its relations with Crédit Agricole S.A. employees and its relations with Crédit Agricole S.A. suppliers and subcontractors.

For each of these scopes, the framework for managing these risks consists of policies and action plans that include risk identification, risk assessment and risk mitigation phases. The level at which these action plans are deployed is assessed in order to ensure they are effective and make ongoing improvements towards preventing these risks.

In relations with Crédit Agricole S.A. employees

Crédit Agricole S.A. signed an international framework agreement with UNI Global Union, the global union federation for the private services sector, on 31 July 2019. This worldwide agreement was extended until July 2023 and covers human rights, basic labour rights and the development of dialogue with staff representatives. It reinforces the commitments made by Crédit Agricole S.A. by proposing the same social standards for all employees, regardless of where they work, and by helping to improve working conditions. The agreement establishes a reference framework applicable to Crédit Agricole S.A.'s 72,758 employees across the 42 countries in which it operates.

- Maintaining occupational health and ensuring fair social protection:

Crédit Agricole S.A. ensures that its premises offer a safe and healthy working environment for its employees and provides preventative measures, information sessions and support for its employees (free screening and vaccination campaigns, advice on workplace ergonomics, nutrition and stress management, support tailored to the caregivers among its employees, etc.).

Psychosocial risk prevention mechanisms are in place within Crédit Agricole S.A. (toll-free numbers, 24/7 helplines), as is a helpline dedicated to employees with disabilities.

In addition, particular attention is paid to employees undergoing an organisational transformation and support measures are rolled out where necessary (training courses, awareness sessions, collective agreements). Crédit Agricole S.A. is also actively involved in the social protection of all its employees, particularly in matters relating to health, retirement, death, and short/long-term disability. Supplementary hospital health coverage was introduced at Crédit Agricole S.A. in France in 2017. Since 2020, the Take Care programme has provided access to health and provident schemes (offering death and short/long-term disability coverage) for employees of the Group's international retail banks located in two countries (Egypt and Ukraine).

The International Framework Agreement of 31 July 2019 includes a clear commitment towards parenthood since it sets out the principle of 16 weeks of paid maternity leave for all female Crédit Agricole S.A. employees, which has been in effect since 1 January 2021. The Agreement also recommends that entities offer adoption or paternity leave in order to take different parenthood models into consideration. Crédit Agricole S.A.'s new medium-term business plan (Ambitions 2025, published on 22 June 2022) upholds these commitments as one of the objectives stipulated in the plan is to extend paternity leave to all Crédit Agricole S.A. entities by the end of 2025. The Agreement includes a major commitment to employee benefits (short/long-term disability, death and health) as it calls for an inventory of all the employee benefit schemes in effect in the Group's entities in order to map current practices in relation to their national and professional frameworks. The inventory was last updated in 2021 and showed that there had been no failure to comply with local statutory requirements in terms of health or social security. In addition, a study was carried out in 2021 (with consultancy firm Mercer) into social security, health and maternity benefits and into the rollout of maternity leave in the Group's international operations; it found that the entitlement to 16 weeks of maternity leave applies to a full 99.97% of Crédit Agricole S.A.'s female employees.

- Ensuring the safety and security of employees:

Crédit Agricole S.A. seeks to ensure the safety and security of its employees as well as any visitors, customers and service providers on its premises. During the Covid-19 public health crisis, the Group focused particularly on the measures it needed to take in order to protect the health and safety of its employees and safeguard their working conditions, especially when they returned to on-site work. The Group therefore worked alongside its occupational health services and staff representatives to adjust these measures regularly as the public health crisis unfolded, in accordance with the decisions and recommendations issued by the public authorities.

The Physical Security and Safety Department (*Direction sécurité-sûreté*, or DSS), which reports to the Corporate Secretary, coordinates and oversees the Physical Security and Safety Business Line. This includes all Security and Safety Prevention Managers (*Responsables sécurité-sûreté-prévention*, or RSSP) within each entity, as well as dedicated units such as the Group Security and Safety Business Line Committee, the Group Security and Safety Committee and the Group Security Committee. It relies on discussions with other departments involved in crisis management where necessary. In accordance with the Group's operational policies and security standards, a procedure describing the general framework governing this business line, the way it is organised, how it operates, and the role of the Physical Security and Safety Department, is published within the Crédit Agricole Group and is in the process of being updated.

The DSS analyses and monitors any security threats and risks faced by the Crédit Agricole Group, in conjunction with the national security authorities in France and abroad. It establishes and distributes the operational security policies applicable by all Group entities governing the "physical security and safety of non-commercial buildings", "traveller and expatriate security", "crisis watch and crisis management relating to the security of individuals and property", "events security", "executive protection", and "security and safety checks on individuals and property".

These policies are supplemented with action plans such as the Special Security Plan. The DSS seeks to prevent the physical risks that might affect individuals and property by participating in the crisis management mechanism coordinated by the team tasked with overseeing operational and IT risk controls within the Group's Risk Department, which is in charge of the Business Continuity Plan including the emergency response procedures that form part of the Group's crisis management mechanism.

The Group's security strategy is based on forward planning, prevention and staff training so that employees can learn the right behaviours and respond effectively when faced with security issues. Accordingly, all employees are offered two training courses in an e-learning format. The first has been available since 2018 and deals with the best action to take in the event of a terrorist attack; it was submitted by the DSS to the Consultation Committee which is made up of all the trade union organisations representing Crédit Agricole S.A. The second deals with the best action to take in the event of a security event (such as a fire) and first aid. It was approved by the Group's Security Committee and has been mandatory for all staff at Crédit Agricole S.A. and its subsidiaries since the end of 2020. These training courses are also offered to the Regional Banks. Moreover, fire prevention awareness actions are taken at the Group's sites alongside regulatory evacuation drills, and "evacuation crew" training is offered to staff volunteers.

In an effort to reinforce the Group's safety culture, the DSS hosts a dedicated page on the Group intranet website and has distributed videos on health and safety regulations on various campus communication media. In 2023, the DSS will mark World Day for Safety and Health at Work with a safety initiative organised jointly with the Group's entities. A project has been launched to overhaul safety procedures at the Evergreen and SQY Park campuses involving more than 15,000 employees of Crédit Agricole S.A. and its subsidiaries; it is due to be completed in 2023.

- Combating discrimination:

As a signatory of the Diversity Charter, Crédit Agricole S.A. has been committed for a number of years to an approach aimed at promoting diversity and gender balance. This diversity policy is based on the principles of non-discrimination and diversity with respect to background and age and takes the form of agreements on topics such as non-discrimination in hiring, training, promotion and compensation and ensuring an even work-life balance.

As a signatory of the Parenthood Charter since 2008, Crédit Agricole S.A. reiterated its commitment towards parents in the workplace by signing the new Parenthood Charter in May 2022. Crédit Agricole

S.A. has thus pledged in particular to guarantee the principle of non-discrimination towards employees with children when it comes to career development. In addition, Crédit Agricole S.A. signed the statement of support for the United Nations Women's Empowerment Principles (WEPs) on 27 July 2022, thus demonstrating its commitment to a culture and practices that advance gender equality and female empowerment.

Training and awareness sessions are regularly provided within Crédit Agricole S.A. and annual indicators are followed in order to monitor the outcomes achieved by the measures taken. Furthermore, Crédit Agricole S.A. and all its entities pay particularly close attention to equal pay for men and women. Any wage gaps are monitored more closely and measures are taken to remedy the situation where necessary.

The French government manages a gender equality index with which the Group is able to gauge the effectiveness of the measures it takes through the positive scores it obtains. All its entities scored at least 83/100(2) this year. The Crédit Agricole S.A. UES (Economic and Social Unit) scored 91/100, an improvement on 2021.

Lastly, an official proactive policy adopted in 2005 promotes the employment and integration of people with disabilities under three-year disability agreements. The number of disabled people hired and volume of procurement contracts signed with firms in the sheltered and adapted employment sector (which caters to disabled employees) are among the indicators that are measured annually. 2022 was the final year of the sixth three-year agreement (2020/2022) governing the employment of people with disabilities and a seventh Group disability agreement was signed with staff representatives on 21 December 2022 for the 2023/2025 period. Under the terms of this agreement, which is due to be approved in early 2023, Crédit Agricole S.A. pledges to integrate more disabled people into its entities by 2025 and, to this end, to roll out measures aimed at promoting inclusion, in particular by training and raising awareness among the Group's employees and by supporting disabled people as they take up their positions or move to other roles within the Group. Since the first agreement was signed in 2005, the employment rate of people with disabilities has risen from below 2% in 2005 to 5.2% in 2022, and the volume of purchases made from inclusive companies has increased six-fold over the same period. Crédit Agricole S.A. hired 38 disabled people in 2022, 20 of whom were taken on under permanent contracts. The International Framework Agreement also upholds the importance of this commitment towards disability.

- Maintaining social dialogue within the Group:

Crédit Agricole S.A. maintains dialogue with all those involved in labour relations through its Group Human Resources Division and representatives of the human resources department within each entity.

This dialogue is organised on a number of levels to take account of the Crédit Agricole Group's many operations throughout Europe. Some 13 countries (accounting for over 90% of Crédit Agricole's employees) are represented by the European Works Council, which meets once a year; in France, the Group Council, within which staff representatives and senior management discuss the Group's strategy and economic and social situation, meets twice a year.

In addition, there are two other bodies within Crédit Agricole S.A. that help to maintain social dialogue: a Consultation Committee, within which executive managers can present their projects and engage in discussion with staff representatives; and meetings of trade union representatives, which are organised monthly to foster debate, engage in close dialogue and explain any strategic developments within the Group's business lines.

Trade unions are integral to the Group's life and, in view of their importance, Crédit Agricole S.A. signed an "Agreement on the career path of staff representatives" on 8 March 2019. This seeks to encourage involvement in staff representation and to highlight the benefits of the role of staff representative when it comes to career development. Through this agreement, Crédit Agricole S.A. pledges to promote the attractiveness of trade union representation and elected office among employees wishing to become involved in social dialogue within its entities. Crédit Agricole S.A. is also committed to promoting and respecting equal access for men and women to trade union positions and elected office and to combating all forms of discrimination arising from the exercise of such office. The social dialogue training and awareness initiatives carried out within Crédit Agricole S.A. for employees, managers and staff representatives since 2021 were renewed in 2022.

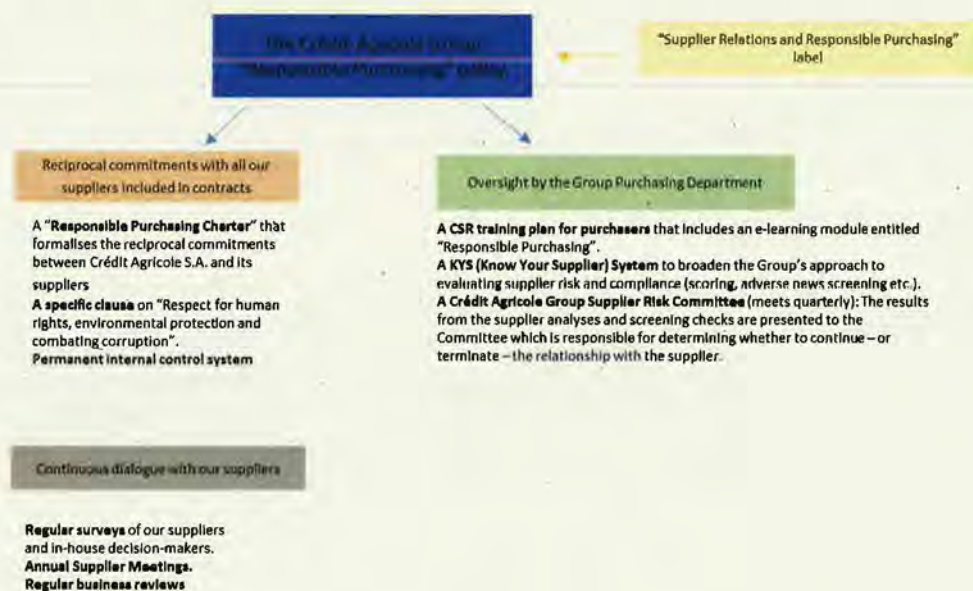
In relations with Crédit Agricole S.A. suppliers and subcontractors

- Ensuring that the suppliers and subcontractors with whom we have an established relationship agree to the commitments made under Crédit Agricole S.A.'s vigilance system

Crédit Agricole S.A. has a "Responsible Purchasing" policy that applies to the entire Crédit Agricole Group. It is common to all employees and suppliers and seeks to ensure that, when making a purchase, consideration is given to whether there is an actual need for the item and to its economic aspects. The policy is implemented via a "Responsible Purchasing" programme rolled out across Crédit Agricole S.A. and its subsidiaries and shared with the Regional Banks.

This programme was designed jointly with our suppliers and internal procurement managers and enabled Crédit Agricole S.A. to obtain the "Responsible Supplier Relations and Purchasing" label, which is awarded by the French Ombudsman and French National Procurement Council (*Conseil national des achats*, or CNA) and includes ISO 20400 requirements.

The organisational structure and action plans introduced by the Group under its Responsible Purchasing programme enable us to exercise our duty of vigilance in our supplier relationships, with centralised management carried out by the Group Purchasing Department, a dedicated governance structure (Group Supplier Risk Committee), reciprocal commitments with suppliers formalised in our contracts (a Responsible Purchasing Charter and a specific clause covering respect for human rights), and ongoing dialogue with our suppliers.



- Assessing and managing significant Environmental, Social and Governance (ESG) risks in our purchasing activities

The ESG risk management approach led by the Group Purchasing Department incorporates the complementary aspects of risk identification, risk assessment and risk mitigation.

The Group Purchasing Department has a risk map to identify, analyse and prioritise the categories of purchases presenting ethical, social or environmental risks.

This approach has made it possible to prioritise purchasing categories according to four levels of ESG risk based on a risk's intrinsic seriousness and probability of occurrence. For categories considered to be most at risk (real estate projects, promotional material, IT hardware and servers), the Group Purchasing Department has reinforced its CSR assessment procedures by applying specific risk

prevention measures (diagnosis, recommendations and CSR issues specific to the goods or services being purchased) in addition to the general measures taken under its Responsible Purchasing policy.

The three categories identified are covered by a progress plan drawn up with our suppliers and procurement managers and then broken down into specific actions to address different issues according to the varying levels of CSR maturity among our suppliers.

A specific assessment of the supplier's CSR performance is conducted during the tender phase. The assessment is carried out on two levels and is incorporated into decisions on selecting a given good or service when awarding a contract to a supplier, accounting for at least 15% of its overall rating. The first consists in getting the supplier's CSR performance assessed by an independent and specialised third party, EcoVadis. The second deals with the specific CSR elements of the purchased good or service and, in particular, with duty of care aspects. A guide has also been drawn up by buyers together with representatives of internal procurement managers and suppliers to help buyers incorporate CSR criteria into their calls for tenders. Training workshops to integrate the entire process are offered to all newcomers joining the Purchasing business line, whether for Crédit Agricole S.A., its subsidiaries or the Regional Banks (three sessions were held in 2022).

In 2020, the Group Purchasing Department supplemented this procedure by working with three other banks and a third-party evaluator to launch an on-site audit process on human rights, health and safety, and the environment for purchasing categories common to all the parties involved (cash handling, ATMs and document shuttling).

The Group Purchasing Department has also enhanced its procedures for assessing supplier risk (solvency, economic dependence, legal documentation, concentration) and supplier compliance (corruption risk) by means of a KYS (Know Your Supplier) procedure; this procedure is described in a central procedural note and broken down into three technical notes which assign scores to suppliers, screen and identify them. Scores are used to establish a hierarchy of risk levels and, in the case of suppliers with the highest level of risk, adverse news screening (particularly on the environment, respect for human rights, and employee health and safety) is carried out more frequently (weekly). The results of these analyses are presented to the Group Supplier Risk Committee, which then decides whether to continue – or terminate – relations with a supplier.

In 2022, the Group Purchasing Department partnered up with BPCE to initiate a process for pooling the third-party supplier evaluation procedure (with regard to corruption) on a shared platform (INDUED solution provided by publisher ALTARES) aimed at establishing a scoring system, processing alerts and sending out generic questionnaires to suppliers. This procedure is based on common and shared rules; it is to be extended to new partners and meet the obligations set out in the Sapin II law as part of the French Anti-Corruption Agency's (AFA) oversight duties.

Further information about the approach taken by the Group Purchasing Department, particularly as regards inclusive purchasing and procurement decarbonisation, is provided in the Statement of Non-Financial Performance (see chapter 2, part 3.6.3. "Responsible purchasing").

WHISTLEBLOWING AND REPORTING PROCEDURE

In order to reinforce risk prevention, a centralised system for reporting alerts is open not only to Group employees but also to third parties, enabling them to report any breaches of Group ethics, policies or procedures. It is now easier to report alerts relating, among other areas, to human rights, health and safety or the environment, thanks to a digital alert reporting and processing tool that can be accessed via a link available on our website at <https://www.bkms-system.com/Groupe-Credit-Agricole/ethics-alerts>. The anonymity of persons reporting alerts is ensured if the alert is reported in accordance with regulations.

This alert processing tool was introduced within the Crédit Agricole S.A. corporate entity in September 2018 and the rollout was completed across all Crédit Agricole S.A. group entities in 2020. It is available in 11 languages (French, English, German, Spanish, Italian, Dutch, Portuguese, Polish, Ukrainian, Serbian and Romanian). It makes it easier to carry out quantitative and qualitative analyses of alerts (number and type of alerts), and these analyses are then used to assess non-compliance risk and to update the preventative measures in place.

Support measures have been made available to Group entities as part of this rollout: a shared documentation area has been created, guidelines have been distributed to staff responsible for handling alerts, and training has been provided to users of the alert processing tool.

Since October 2019, an Alerts Management Committee has intervened as and when required depending on the sensitivity of an alert. It meets at least once a year to review the whistleblowing mechanism (e.g. to examine statistical data and to analyse why alerts were reported and where they were reported).

CONTINUOUS IMPROVEMENT

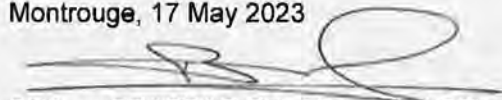
The mechanisms in place to prevent risks of human rights violations address both the obligations arising from international rules and recommendations and those established under national law. Therefore, all efforts to prevent these risks are developed in accordance with the measures set out in the Sapin II Law of 9 December 2016 on Transparency, the Prevention of Corruption and the Modernisation of the Economy, and the Vigilance Plan established under the French law of 27 March 2017 relating to the duty of vigilance of parent companies and contracting companies.

Each year, Crédit Agricole S.A. also publishes details about its environmental, social and governance (ESG) risk management procedure in its Statement of Non-Financial Performance (SNFP) as well as in the review of its Vigilance Plan, which can be found in its Universal Registration Document available on our website at the following address: <https://www.credit-agricole.com/en/finance/finance/financial-publications>.

Crédit Agricole S.A. factors the management of modern slavery and human trafficking risks into its approach to duty of vigilance and non-financial risk management, which is reviewed regularly in order to ensure that its policies are properly implemented and effective. Management of these risks is subject to a continuous improvement process, the main components of which are:

- adapting our non-financial risk identification and management tools by updating our risk maps when necessary;
- continuing to roll out targeted action plans in order to reduce supplier CSR risks in the purchasing categories identified as 'high risk' and 'very high risk';
- seeking to involve our suppliers in our efforts, by regularly informing them of our responsible purchasing commitments and strategy.

Montrouge, 17 May 2023



Philippe BRASSAC Chief Executive Officer