

CODE OF CONDUCT

CRÉDIT AGRICOLE S.A.

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1. OUR COMMITMENTS





In May 2017, Crédit Agricole published a Group-wide Code of Ethics which underscores the Group's values of customer focus, responsibility and solidarity. This reference document sets out principles regarding the actions and behaviour 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.

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.

While the 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 the Code of Ethics which is the foundation of the ethical and professional conduct to be respected by everybody in the Group.

The Code of Conduct is designed to provide guidance in our everyday actions, decisions and behaviour. It is the fruit of a collaborative approach involving the various business lines in Crédit Agricole S.A. and a joint development process which mobilised experts in all Group departments (Human Resources, Procurement, Communication, Marketing, Compliance, Legal, Sustainable Development, etc). There may be some specific differences or examples within the context of the Group's different business activities.

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

2. USING OUR CODE OF CONDUCT





USING OUR CODE OF CONDUCT ▶

The Crédit Agricole S.A. Code of Conduct is a tool and a guide to help us better explain our professional obligations and adopt a behaviour that is in line with Crédit Agricole Group's ethics and values.

WHO DOES IT APPLY TO?

The Code of Conduct applies to everyone in the Group, be they directors, managers or employees, regardless of their position and function in Crédit Agricole S.A.

OBJECTIVES AND HOW TO INTERPRET THE CODE?

The Code of Conduct has been drawn up to guide us in our actions and help us make decisions in accordance with the Group's ethical rules and values and with legislation. It explains, by topic, the professional behaviour to be followed and promoted in carrying out our duties and in our working relationships. The various topics are classified into four sections: 'customers and suppliers relations'; 'social, environmental and societal issues'; 'anti-corruption'; and, 'protection and reputation of the Group'. Note that conflicts of interest, 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, the 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

5 QUESTIONS

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, and Legal Affairs departments, 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?

A multi-disciplinary team that is backed by the Compliance, Human Resources and Sustainable-Development Heads is responsible for implementing, monitoring and updating the Code of Conduct. This team liaises with the departments concerned in order to provide regular feedback to the Sustainable Development Committee which is reported to the Board of Directors. The contents of the Code may change over time. The Code does not replace the internal regulations and procedures of Crédit Agricole S.A. It is your duty and responsibility to consult and apply them.

HOW IS THE CODE OF CONDUCT MADE AVAILABLE? WHAT IS ITS VISIBILITY?

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

WHAT ARE EMPLOYEES' OBLIGATIONS?

Everyone must familiarise themselves with the principles set out in the Code of Conduct and adhere to them in the performance of their duties. In addition, everybody must transmit and promote the values and principles presented in the Code of Conduct, with vigilance and good intentions. Moreover, everybody must follow the training programmes offered on Code of Conduct related topics.

ONE KEY RULE TO REMEMBER

ONE KEY RULE

Whenever you notice or suspect an inappropriate act or form of behaviour, 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 strengthen risk prevention by giving all internal and external employees and commercial partners the means to report the facts that fall within the scope of application of the 'whistleblowing' procedure. An internal whistleblowing procedure designed to collect alert notifications has been set up.

MANAGER ROLES AND EXPECTATIONS

As a 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. For this, you will need to refer to the Code of Conduct, as well as its Code of Ethics and Internal Regulations. 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, conduct yourself in a transparent manner, and be an example for your teams. Show that it is entirely possible to attain the objectives that have been set, while respecting the ethics and values of the Group.

3. OUR RULES OF CONDUCT




RESPECT
VIGILANCE
RESPONSIBILITY
ETHIC
ATTITUDE
LOYALTY
INTEGRITY

EVERYDAY ETHICAL PRACTICES ▶

DEFINITION

Ethics fall into the moral scope referring to values, particularly those of the Company. These values should drive our decisions and our professional behaviour. Expressed as professional rules of conduct underpinning our activity, they define our ethical approach.

DETAILS

Ethics concern:

- company-specific values formulated as generic concepts (for example, respect for others, solidarity, etc.) and developed into the Company's «principles of action» (for example, the fight against discrimination);
- the approval and adoption of these values and the ethical framework by the highest level of corporate governance;
- a general mission to make known and enforce the values, principles and rules of conduct, in such a way that the ethical framework serves to ensure a feeling of belonging to the Company, and the trust necessary for life in the workplace 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:

- the implementation of internal rules and procedures transposed into Company laws and regulations;
- the existence of a prescription and control function performed by a senior manager, which enables the Company to prevent major non-compliance risks, particularly in regulated business sectors.

While ethics promote the respect for values and rules of conduct, the aim of compliance is to prevent infringements of the ethical framework and of the law in order to protect the Company against sanctions and any risk to its reputation or brand image.

"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 prioritising 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 Company employees or with all of its stakeholders, human rights and people's fundamental social rights must be rigorously applied. Preventing all forms of discrimination or harassment, promoting diversity and gender equality, respecting health and safety measures, and ensuring the protection of employee and customer data: by respecting these principles we create a favourable working environment, which is a source of performance and satisfaction.

• RESPECTING THE COMPANY'S ENVIRONMENTAL AND SOCIETAL COMMITMENTS

For Crédit Agricole S.A., this involves implementing a long-term strategy for our customers so that we can share the value thus created, be part of the sustainability of financial projects, and invest in the regions. Particular attention is paid to "Green Finance" for the purposes of remaining a reference in supporting the energy transition for a "low carbon" economy, while protecting nature. All directors, executives and employees act as ambassadors for the Group's Corporate Social Responsibility (CSR) approach which is designed to support the regions, strive for excellence in relations with customers, mutual shareholders and employees, and manage risks.

• 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". Other areas include gifts and invitations, facilitation payments, conflicts of interest, 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 Company, and guard against any risk of conflict of interest. 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. and of the Group at the internal and external levels. 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 place in our Group. To avoid this, we must take care to preserve our reputation by respecting all the principles set out in this code, by ensuring that we do not make any remarks that could commit the Group, divulge any confidential information about its professional environment or be party to spreading rumours.



CUSTOMERS AND SUPPLIERS RELATIONS

1. RELATIONS WITH CUSTOMERS ▶

DEFINITION

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 those who exercise a support function for the Group.

DETAILS

To ensure that customer expectations are met, satisfaction surveys are conducted, in particular by Crédit Agricole S.A., in conjunction with the networks and business lines and for all markets. Customer complaints are handled internally by the entities concerned (including Crédit Agricole S.A.), with a view to continually improving our services and striving for excellence in our customer relationships. Training is regularly provided to employees whether or not they are in direct with customers.

THE COMMITMENT OF CRÉDIT AGRICOLE S.A.

As a universal, customer-focussed bank, Crédit Agricole looks to forge global and sustainable relationships with its customers. Designed in the spirit of true partnership, the bank is committed to supporting its customers at all times, making their lives easier, helping them achieve their projects, and advising them in making decisions by proposing solutions adapted to meet their needs.

Crédit Agricole is also committed to providing support and services to all of its customers, notably by warning about risky situations and supporting them through periods of difficulty, following a life crisis or an accident or a precarious 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. This approach is fully in line with the protection of personal data.

I must do

- Listen to your customers and take their interests into account in every action you propose;
- Get to know your customers better, while respecting their right to privacy, so that you can advise and support them appropriately;
- Always provide customers with clear and accurate information that is not misleading;
- Request that a NAP Committee (New Products/ New Activities) analyse all newly marketed activities, products and services to ensure compliance with legal and regulatory requirements, notably concerning customer information and make sure the product matches 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 interest 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 authorised by a NAP Committee.

EXAMPLES

I create 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, ensure that the investment horizon does not conflict with the recommended term of the product, and that the product is perfectly suited to the needs of this clientele. It is mandatory that this new product be submitted for assessment by a NAP Committee.

After reviewing my new product proposal, the Committee NAP issued a condition. Knowing that for reasons of competition, this new product should be launched rapidly within the next few days, can I still market it?

No, the NAP process is an essential mechanism for ensuring customer interests are protected and avoiding marketing products that could cause them harm. If, after verifying the risks and compliance, the NAP Committee gives a conditional agreement, the restrictive clauses thus issued are of a blocking nature. You cannot, therefore, market the product or service until all conditions have been lifted.

2. CUSTOMERS' PERSONAL DATA ▶

DEFINITION

The Crédit Agricole Group has drawn up a charter on the use of its customers' personal data. This charter 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 COMMITMENT OF CRÉDIT AGRICOLE S.A.

The Crédit Agricole Group has taken a stand on the sensitive issue of personal data, by committing to act in an ethical and responsible manner and adopting a transparent and instructive approach in dealings with its customers.

I must do

- Involve data protection experts at the beginning of projects to ensure compliance with all regulations on the protection of personal data;
- In the same way, involve IT security experts and representatives in the project;
- Ensure the project is in keeping with the principles of the charter: security, integrity and reliability, ethics, transparency and education, etc.;
- If in doubt, always contact your project's data-processing and civil liberties expert or the personal Data Protection Officer (DPO).

I must not do

- Propose 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 Code, or the values set out in the Group's Customer Project;
- Process any personal data for unintended purposes or without the customer's prior knowledge;
- 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

I collected the personal data of my customers, and then declared the processing and the results thereof to the National Commission for Data Protection and Liberties (CNIL) before the General Data Protection Regulation (GDPR) was put in place. At the time, we had already received CNIL approval. Can I still use these data?

Under the new regulations which went into force in May 2018, you may use or process such personal data in accordance with the declaration you made. However, the new regulation requires that companies keep a register of all data processing operations. You must record the characteristics of the CNIL-approved data processing operation in this register.

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 sourced from the social networks and is not necessarily reliable; nevertheless, from the customers' point of view this information is sensitive. Refer to the best practices and the guidance on interpretation presented in the Group's Personal Data Code. Ask for advice from our experts in the Legal, Compliance and/or IT security departments. Finally, if you can, do a customer study to test the idea.

3. FAIR AND EQUITABLE CHOICE OF SUPPLIER ▶

DEFINITION

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 companies must receive the same treatment from the buyer(s), the decision-maker(s) and/or any other employee of the Crédit Agricole Group, which would be affected, and the choice must be based on objective elements.

This implies that buyers, decision-makers and/or any other employees of the Crédit Agricole Group adopt a responsible and fair attitude to the bidding companies throughout the duration of the call for tender. Consequently, taking purely individual interests into consideration in selecting the chosen firm should be avoided.

I must do

- Report any potential risk of conflict of interest (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 and modified 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.

I must not do

- During calls for tenders, provide 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 invitations'');
- Change the selection criteria, and/ or the ranking weighting, after the date of receipt of the replies to the call for tenders. des « cadeaux et invitations » (voir fiche spécifique).

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 summarise what you need then draft a specification note. A potential supplier cannot do this since he may be inclined to propose his solution, tools or services that would not necessarily correspond to your needs.

You must draw up, with the help of a buyer in the Crédit Agricole Group, the list of companies to be interviewed, and be supported by a Group buyer throughout the interviewing process (and subsequent post-interview phases), in order to find the supplier that best suits your needs.

4. RESPONSIBLE RELATIONS WITH SUPPLIERS ▶

DEFINITION

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 all forms of discrimination, the 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 commitments and principles of the Crédit Agricole Group include:

- financial equality: remunerating suppliers in accordance with applicable laws and regulations;
- equal treatment;
- transparency of our processes;
- promoting sustainable relations;
- preventing corruption, by adhering to rules known to suppliers;
- conducting a comprehensive cost analysis of all costs incurred over the lifetime of the goods or services;
- integrating social and environment (CSR) performance in supplier selection criteria;
- promoting the regions by choosing local suppliers when appropriate.

The diversity of these commitments and 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 interviewed, 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.

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 analyse 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?

Suppliers need a minimum 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 buyer (delegated or otherwise) will obtain information about the supplier, concerning its economic dependence, and will propose alternative solutions. Should the service come to an abrupt halt, the risk incurred could be financial, operational and/or legal, including respecting the notice period required for contractual termination.

5. COMPETITION ▶

DEFINITION

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.

DETAILS

Many types of behaviour, such as cartels and abuse of dominance, can jeopardise free competition.

A cartel is an agreement, concerted behaviour or a planned and intentional collaboration between companies whose purpose or effect, even potentially, is to coordinate their behaviour 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 forms of cartel agreements (such as the joint fixing of sales prices or commercial conditions), the distribution of customers or markets, coordination of tenders or a decision to boycott a particular customer or supplier, also constitute a cartel.

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.

THE COMMITMENT OF CRÉDIT AGRICOLE S.A.

All Crédit Agricole S.A. activities must be carried out in compliance with competition law, the basic principle being that companies operating in a market must determine their strategy in an autonomous manner. Agreements between independent companies and abuses of dominant position are therefore strictly prohibited.

Sensitive information is non-public data that is strategically useful (information on prices and trends, list of customers, market capacity and distribution methods, strategy and 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...).

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 your Legal manager 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 record;
- 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 certain customers or suppliers;
- Negotiate clauses such as those limiting the commercial freedom of trading partners without seeking advice from the Legal department.

EXAMPLES

I am to attend a meeting or participate in discussions 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. In the event of non-compliance with competition rules, leave the meeting and request that your departure be noted 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 sharing. 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.



SOCIAL, ENVIRONMENTAL AND SOCIETAL ISSUES

6. PROTECTION OF EMPLOYEES' DATA ▶

DEFINITION

Everyone has the right to have their privacy respected. Personal data may only be collected, processed and stored for specific and legitimate purposes. This information must be brought to the attention of all employees.

DETAILS

The use of data is strictly controlled:

- Only data that is relevant and necessary with regard to the targeted objectives, which must have been clearly defined in advance, should be processed;
- Personal data must not be stored for an unlimited period of time;
- 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 unauthorised 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 increasingly required to communicate their personal data in paper-less form, 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 and respect for their privacy.

I must do

- Ensure the appropriateness and relevance of the information collected;
- When necessary, ensure that the way personal data is used is entered 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 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;
- Conserve personal data without any authorisation.

EXAMPLE

As part of my duties, I have access to the personal data of all employees in my area of management. I didn't have enough time to finish my file tonight and copied the information onto my USB key so that I could make some headway on my way home. Unfortunately, on the train, someone stole my laptop with my USB key in it. Should I notify someone?

It is imperative you report this theft to your manager as well as to the Crédit Agricole S.A. Security Officer who will inform the personal Data Protection Officer (DPO). Not only is there business information on your computer, but you also have copied personal data. The loss of this USB key could have serious consequences and cause significant damage, both on the Company and the employees. Never copy any personal data whether onto your computer or external devices, particularly when these data are not encrypted. 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 Crédit Agricole S.A. 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 Company 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 organised by the Company and reporting any situation that could constitute a risk to security and safety in the workplace to the Human Resources department.

I must not do

- Ignore Crédit Agricole S.A.'s rules on health and safety at work;
- Ignore any situation that could compromise the safety and security of our working environment.

EXAMPLES

I've noticed a change in behaviour 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 of a colleague. You must inform the security officer in writing, so that she or he can rectify the situation and take the necessary measures to ensure the security of all persons on the site.

8. NON-DISCRIMINATION ▶

DEFINITION

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 law on discrimination currently in force defines twenty-four discrimination criteria:

- origin;
- gender;
- family situation;
- pregnancy;
- physical appearance;
- the particular vulnerability of a person resulting from their socio- economic situation which is clear or known to its author;
- surname;
- address;
- bank information;
- state of health;
- loss of autonomy;
- disability;
- genetic characteristics;
- morals;
- sexual orientation;
- gender identity;
- age;
- political opinion;
- trade union or cooperative activities;
- the ability to express oneself in a language other than French;
- actual or alleged membership or non-membership of an ethnic group, a nation or an alleged race;
- religious convictions.

According to law, discrimination may be direct:

"the situation in which ... a person is treated less favourably 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 favour of gender equality and diversity is to allow employees to feel they are treated fairly from the moment they join the Company, 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 behaviour that would or could be discriminatory against employees, suppliers, customers, etc.; Help, talk about it and if necessary, consult your manager and HR department;
- 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 them the day off?

There is no reason to take a day off for a religious holiday other than those falling on public holidays. Leave dates must be decided with the manager and take into account the proper functioning of the service in question. 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 Agefiph, 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 your Human Resources contacts. If necessary, actions can be implemented, with the support of the Disability Integration Manager of your entity, to ensure that the employee's integration into the team is carried out in the best possible way.

10. THE FIGHT AGAINST HARASSMENT ▶

DEFINITION

The law punishes the harassment of others through repeated comments or behaviour, 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 the act of repeatedly making sexual comments towards or imposing behaviour of sexual nature on a person that undermine their dignity because of their degrading or humiliating nature or create an intimidating, hostile or offensive environment.

Sexual harassment also covers the use, be it recurring or not, of any form of serious coercion for the purposes of obtaining an act of a sexual nature, whether it is sought for the benefit of the perpetrator or for the benefit of a third party.

THE COMMITMENT OF CRÉDIT AGRICOLE S.A.

Crédit Agricole S.A. is committed to ensuring the prevention, detection and resolution of such acts which are offences that will be severely punished.

Any employee or representative trade union organisation may directly request an audience with the joint committee on the prevention and handling of moral or sexual harassment.

No employee, trainee or intern can be sanctioned, dismissed or discriminated against for having suffered or refused to accept sexual harassment or acts of moral harassment or for testifying on such acts or disclosing them.

I must do

- Become acquainted with the Company's internal prevention and action policies and procedures;
- Be attentive to everyone around you, contact the Human Resources 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 of mine is being repeatedly subject, in a humiliating way, to criticism of their work and being reproached 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 Human Resources contact 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 behaviour, he/she keeps pestering me for a date.

Report this unacceptable behaviour quickly to your manager or Human Resources contact in order to alert them to this unacceptable behaviour. You can also seek the support of an employee representative to accompany and support you so that this situation stops as soon as possible.

11. EXTRA-PROFESSIONAL ACTIVITIES ▶

DEFINITION

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

Having a salaried job does not prevent you from having an independent or self-employed activity at the same time. Accumulation of activities is possible since salaried jobs are the only activity that is subject to working time regulations. It follows, for example, that, employees can exercise an activity in a social form (non-profit association).

However, while the principle is the freedom to work, 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 Company, notably by committing acts of disparagement or undertaking competitive practices that would be against the interest of the company.

I must do

- Inform your manager beforehand if you're contemplating exercising a remunerated activity outside your working hours (except for the production of scientific, literary or artistic works);
- Be transparent with your manager, and declare the status of your situation to the Compliance Manager;
- Respect the obligation of confidentiality, professional secrecy and trade secrets;
- Be well acquainted with the terms of your employment contract in order to apply the clauses that you are required to respect. If necessary, ask the Human Resources department to explain it to you.

I must not do

- Exercise an activity that competes with that of the Company during the term of your employment contract (including using a period of leave to perform a remunerated activity or training period with a company, whether or not it is a competitor);
- 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 interest;
- 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 materials or any other corporate resources for the purposes of any extra-professional activity.

12. ENVIRONMENTAL STRATEGY ▶

DEFINITION

The European Commission defines Corporate Social Responsibility (CSR) as the responsibility of companies with regard to the effects they have on society and, more specifically, how companies integrate social and environmental concerns in their business operations and in their interaction with their stakeholders on a voluntary basis.

DETAILS

Businesses must contribute to sustainable development, including the health and well-being of society.

For this, they must commit to:

- Taking into account stakeholders' expectations;
- Fully meeting legal obligations or even going beyond them;
- Investing more in human capital and the environment, integrating this responsibility across the organisation and implementing it in all internal and external relations.

THE COMMITMENT OF CRÉDIT AGRICOLE S.A.

Crédit Agricole S.A. demonstrates its environmental approach in all its businesses and in its corporate operations with several goals:

Reducing its direct environmental footprint:

- by creating momentum around environmental topics;
- by continuously improving its eco- efficiency;
- by preserving resources;
- by reducing its energy consumption and its direct carbon footprint;
- by reducing the amount of waste produced by its sites;
- by optimizing waste recycling;
- by incorporating environmental requirements into its supplier-selection criteria.

Supporting customers to help them meet their environmental challenges:

- by offering them products and services with environmental dimension;
- by taking into account and managing the risks related to the environmental impacts of its businesses. This involves taking environmental risk into account when making financing decisions, making responsible investments and promoting responsible practices, notably in the real estate, industry or agricultural sectors.

Developing green finance:

- by stepping up the financing of renewable energies;
- by increasing investment in energy transition projects and initiatives;
- by contributing to the development of socially responsible investment (SRI) through dedicated funds.

I must do

- Acknowledge the active protection of the environment as the essence of Crédit Agricole Group's identity, and present it as such in your daily internal and external professional activities;
- Be aware of the daily impact of your behaviour on the environment;
- Take personal responsibility and take into consideration the direct and indirect environmental impacts generated by your professional activity;
- Commit yourself to contributing to the Group's environmental objectives and actions, particularly in discussions with customers and stakeholders and when speaking outside of the Company.

I must not do

- Ignore the environmental objectives and commitments made by the Group;
- Believe that Crédit Agricole S.A. is not concerned by the environment.

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 guide and prompt industrial projects to adopt less polluting or even virtuous techniques. 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 ▶

DEFINITION

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 providing strong support in their economic and social initiatives.

THE COMMITMENT OF CRÉDIT AGRICOLE S.A.

The goal of the Crédit Agricole Group is to have a positive regional footprint. By championing local entrepreneurship, allocating savings to activities having a positive impact on the regions, as well as participating in the life and social development of regions and 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 solidarity initiatives abroad. It contributes to development aid, both in France and at the international level, 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;
- Strengthen the social ties in the place you carry out your professional activities for the good of your customers and the Crédit Agricole Group.

I must not do

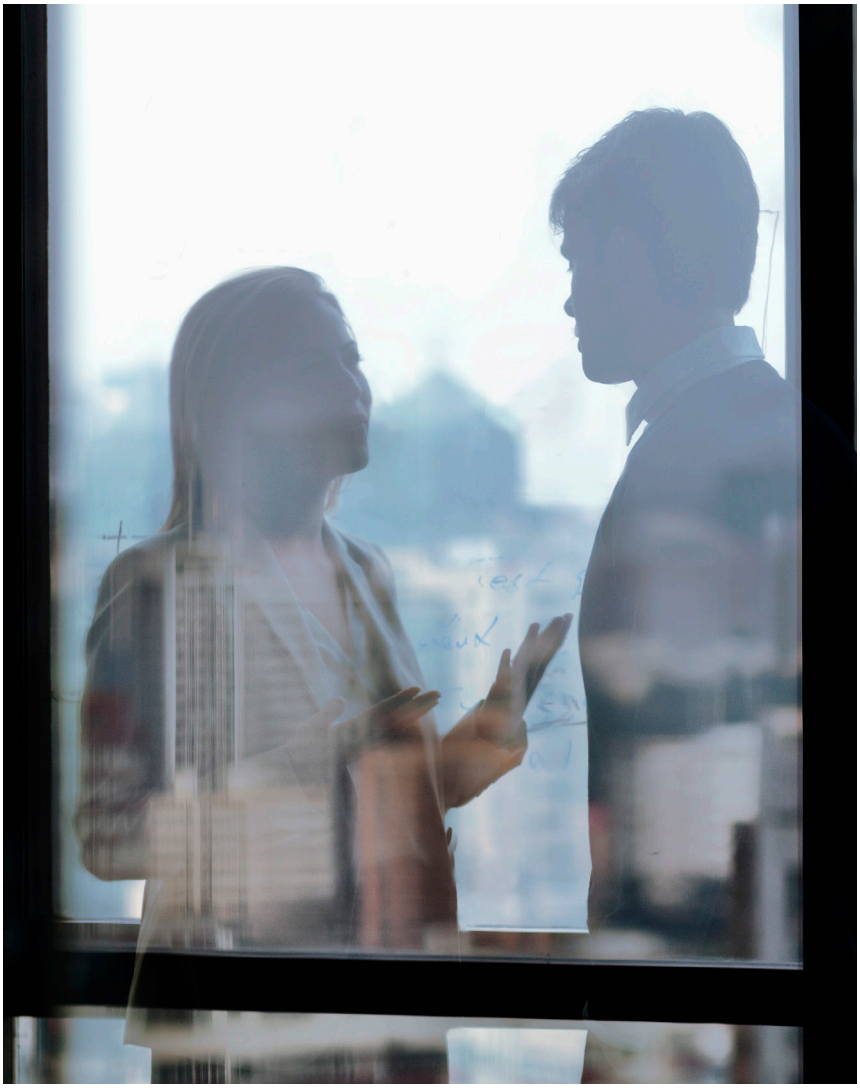
- Involve Crédit Agricole S.A. in actions that do not respect the Group's regional commitments.

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:

- the SQY Park technology campus is part of the economic development of the Paris Saclay region, which promotes local start-ups by contributing to joint projects with other companies in the region and with the federation of Saint-Quentin-en-Yvelines municipalities;
- some of the purchases that are required for Crédit Agricole S.A.'s operations are sourced from local suppliers.



ANTI-CORRUPTION

MESSAGE FROM THE CEO

The long-standing values of our Group: "close customer relationships, responsibility and solidarity" mean that people 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 Anti-Corruption Code of Conduct was drawn up in order to bring together the guidelines for good conduct in terms of the fight against corruption and influence peddling, and to underscore our zero tolerance policy with regard to any infringement of the rules in this Code. As such, the Group has obtained ISO 37001 certification for its anti-corruption management system.

This Code summarizes the situations we may face and provides the necessary information to assist us in making decisions that are in accordance with the laws and regulations in force, notably the «Sapin II» law, and that are also in line with the values and the principles of the Group. This Code should be read in conjunction with the Group's Code of Ethics. It concerns all of us, irrespective of our position in the organization, our duties 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 Anti-Corruption Code of Conduct. We are counting on you.

Philippe Brassac

DETAILS CONCERNING THE APPLICATION OF THE ANTI-CORRUPTION SECTION OF THE CODE OF CONDUCT ▶

The general rules regarding how to use the Code of Conduct apply to the anti-corruption section and, in particular, the "right to notify".

WHO DO THE ANTICORRUPTION RULES APPLY TO?

The Anti-Corruption Code of Conduct applies to everyone in the Group, 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 Code of Conduct is incorporated into the Rules of Procedure and its application is mandatory. 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 behaviour 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 Group's whistleblowing procedure enables everybody to report an anomaly to the Compliance Manager or, in certain cases, to the Supervisory Authorities.

WHAT ARE THE CONSEQUENCES OF INFRINGING THE CODE?

The rules of conduct set out in this Anti-Corruption Code are related to the Crédit Agricole S.A.'s Internal Regulations. In accordance with the latter, sanctions may be imposed on anyone who infringes these principles and legal obligations.

REMEMBER

In the case of employees, all acts of corruption are subject to disciplinary sanctions, as set out in the Internal Regulations, and also to administrative, civil and criminal penalties of up to ten years' imprisonment and €1,000,000 in fines in the case of public corruption. 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 your Intranet space.

14. THE FIGHT AGAINST CORRUPTION ▶

DEFINITION

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 their duties.

DETAILS

In French law, the offences of active bribery (committed by an individual who gives a bribe) and passive bribery (committed by an individual who accepts a bribe) are punishable by up to ten years' imprisonment (public bribery).

Active bribery is the deliberate act of making, either directly or indirectly, offers, promises, donations, gifts or any other advantage to public officials or private persons in order that they perform or refrain from performing an act within the scope of their duties.

Passive bribery concerns public officials or private persons who solicit or authorize, directly or indirectly, promises, donations, gifts, or any advantages for themselves or for others, in order to perform or refrain from performing an act within the scope of their duties.

THE COMMITMENT OF CRÉDIT AGRICOLE S.A.

We employ a zero tolerance policy with regard to corruption including facilitation payments (see specific card on 'Fight against facilitation payments'). No employee may engage in bribery in any form and for any reason whatsoever.

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 and the Fraud Prevention and Anti-Corruption unit;
- Declare internally all gifts and benefits worth over €150 that are offered or received, or sent directly to your home;
- Respect the existing approval procedures for 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;
- Ensure that all payments are substantiated, documented and properly authorized.

I must not do

- Offer, promise or agree to giving a benefit (financial or otherwise) to 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 a task, give consent under a commercial agreement or carry out any other action in the course of your duties or activities;
- Favour a third party in calls for tenders;
- Offer or accept gifts and benefits other than those that have been authorised;
- 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 and Anti-Corruption unit, and the Procurement department, to the fact that someone has tried to bribe you.

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

Politely 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?

Politely decline the request and tell your direct manager.

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

DEFINITION

Influence peddling is the act of persons in a position of public authority or entrusted with a public services mission, or elected officials, who solicit or illegally accept offers, promises, donations, presents or benefits of any kind for themselves or for others, with the aim of using their real or supposed influence to obtain awards, jobs, markets or any other positive decision from a public authority or public administration.

DETAILS

Influence peddling is the act of monetizing a person's position or real or supposed 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 in the same way, carrying a prison sentence of up to ten years.

THE COMMITMENT OF CRÉDIT AGRICOLE S.A.

All employees must adopt business behaviour that is in accordance with French anti-corruption regulations and which is applicable in the countries where we operate.

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 Fraud Prevention and Anti-Corruption unit of 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;
- Favour 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 licence. An employee of a government department in this country offered to exert influence on the person in charge of granting licences and asked me to pay part of the amount required into a bank account. What should I do?

Refuse and notify your manager as soon as possible and seek advice from the Compliance Manager to avoid becoming involved in a corrupt procedure.

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 the request, which constitutes an active act of influence peddling. Discuss it with your manager.

16. FIGHT AGAINST FACILITATION PAYMENTS

DEFINITION

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. These payments are notably made within the context of processing visa applications, issuing authorisations, permits and licences and for customs 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 'Sapin II' law of 9 December 2016.

THE COMMITMENT OF CRÉDIT AGRICOLE S.A.

Facilitation payments are strictly forbidden. Only in exceptional cases, particularly where the security or physical safety of an employee is threatened, can exceptions be made. In such situations, the Compliance Manager should be notified as soon as possible. In addition, facilitation payments must be duly identified and recorded in the accounting books and documents of the Company.

I must do

- Consult your manager or the Compliance Manager if you receive a request for a facilitation payment from a public official;
- Alert your manager or the Compliance Manager 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 authorisation process, which usually takes several months, in exchange for a gratuity. Should I pay?

No, because this sum is not a legitimate expense. Inform your manager or your Compliance Manager because facilitation payments can be considered as corrupt acts.

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. They are offering to speed up the process for me if I offer them some seats for a show. What should I do?

To avoid any act of corruption, politely decline the offer and immediately inform your manager or the Compliance Manager.

17. CONFLICTS OF INTEREST ▶

DEFINITION

A conflict of interest is a situation where the personal interests of an employee may conflict with those of Crédit Agricole S.A.

In other words, when the personal interests of employees or members of management bodies, may influence their discretion or decision-making capacity when carrying out their professional duties.

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

THE COMMITMENT OF CRÉDIT AGRICOLE S.A.

Crédit Agricole S.A. has implemented an active conflicts of interest prevention policy. Conflicts of interest may include acts of bribery or influence peddling and expose the Company 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 I maintain my independence of judgement and avoid situations of conflicts of interest;
- Declare my elected public offices to my manager and Compliance Manager;
- Declare all privately-held administrative, management or executive mandates with any for-profit and non-profit organisations, customers or suppliers of the Group to my manager and Compliance Manager, and request prior approval to hold a corporate office outside the Group;
- Inform my manager of any personal or family ties I may have with a third party in relation to my Company;
- Inform my Compliance Manager of any potential direct or indirect conflict of interest 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 interest or situations that could create such a situation;
- Acquire positions of interest in a 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 interest, inform your manager in writing about this relationship and withdraw from the selection process.

My brother is a services provider in a training organisation, 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 avoid a possible conflict of interest, in particular do not participate in the provider-selection process.

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/or Compliance Manager, and do not participate in any discussions and decision-making on matters that could create a conflict of interest.

18. GIFTS AND INVITATIONS ▶

DEFINITION

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 monitored to avoid any risk of corruption.

Invitations include any form of social contact and invitation either offered or received. In a commercial context, these public relations interactions take the form of meals, hotel accommodation, seminars, conventions or conferences, or invitations to sports, cultural and social events, as well as business and press trips.

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 conflicts of interest. 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.

For gifts and benefits both given or received, the maximum value is set at €150. Before accepting gifts or benefits the value of which exceeds the authorized amount, employees must file a request with their manager, who must then notify the Compliance Manager.

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 at the business level. For all public relations activities, customers must be always be accompanied by the employee of the entity that issued the invitation.

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 interest 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 declaration procedure.

I must not do

- Accept or give any gifts or benefits worth more than the authorised fixed amount or receive any of these at your personal 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 counter party, an intermediary, a supplier or a customer, either directly or indirectly;
- Give or receive gifts in cash;
- Offer or accept any public relations gifts or invitations that could damage the Group's image.

EXAMPLES

I have been invited by one of our suppliers to a trade show abroad. 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 politely and explain clearly the reasons why. It is your division that takes care of all your business expenses. If you are accompanied by a relative, it is up to you to pay his/her expenses.

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

No, you must attend as a representative of your business activity. The same goes for invitations received from providers.

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

The right thing to do is to tell your manager and seek advice from the Compliance Manager. They will tell you the most appropriate way to handle the situation and avoid becoming involved in any corrupt dealings.

19. LOBBYING AND FINANCING POLITICAL PARTIES ▶

DEFINITION

Lobbying or the representation of interests 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 and practitioners 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

- Be transparent about your 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 analysed and audited at the internal level;
- Highlight the consequences for the different stakeholders;
- Record all organisations 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 Manager;
- Make sure that you do not commit the Group with your political opinions and actions;
- Refuse any solicitation in any form whatsoever that requests your political support and could make the Group liable;

I must not do

- Use corruption and any dishonest or abusive practices;
- Use the resources or funds of the Group to engage it in fund-raising or political support activities;
- Offer or accept any gifts and benefits.

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 or your Compliance Manager.

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. Inform your manager and the Compliance Manager immediately.

20. PATRONAGE AND CHARITABLE ACTIONS ▶

DEFINITION

Patronage enables companies to make donations to organisations 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 is a grant or donation made to an organisation for a charitable purpose. It may take the form of a cash or an in-kind contribution or a service.

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 Code of Ethics. More specifically, the Crédit Agricole Group prioritises 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 Communications department for the list of charities authorised by the Group and select one carefully on the basis of its experience, references and reputation;
- Prefer charitable organisations whose accounts are published and regularly audited;
- Select the project that has adequate financial and personnel resources to achieve its objectives;
- Ensure that all contracts drawn up with the organisations 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 organisations have been properly authorized, accounted for and documented;

I must not do

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

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 should I do?

Contact your manager or Compliance Manager 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 or Compliance Manager. Then determine whether or not the financing of this association should be renewed, taking into account the risk of conflict of interest as well as the risk related to the improper use of the funds distributed by the Group.

21. SPONSORSHIP ▶

DEFINITION

Sponsorship, or 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 Company 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 organisations 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 football and judo, etc.

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 organisation, in the light of its experience and reputation;
- Prefer sponsored organisations whose accounts are published and regularly audited;
- Submit a written request to the Executive Management. When sponsored events or activities are controlled by politicians, public officials or their relatives, this must be indicated in my request;
- Draw up a contract including compliance clauses with the sponsored organisation;
- Inform all stakeholders of the sponsorship;
- 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

- Sponsor an organisation suggested by a public official;
- Sponsor an organisation that indirectly benefits, or is controlled by, politicians, public officials or their relatives;
- Sponsor an organisation 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 or your Sponsoring Compliance Manager.

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 or Compliance Manager 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.



PROTECTION AND REPUTATION OF THE GROUP

22. CONFIDENTIALITY ▶

DEFINITION

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 types and forms of customer information. This information cannot be revealed outside the Company, nor can it be shared within the Company 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. All Crédit Agricole S.A. employees are the custodians of and responsible for the confidential information they receive. Employees may use this information internally for professional purposes and make disclosures outside the Company only if authorised to do so or in the cases provided for by law.

Crédit Agricole S.A. employees must also apply the principle of confidentiality with the utmost rigour when using social media. They are responsible for everything they publish on the Internet regarding the Group and must ensure not to disseminate any information via the Internet that they would not divulge outside Crédit Agricole S.A. by any other means. This principle of confidentiality also applies to business social networks.

I must do

- Respect the strict confidentiality of the information to which you have access concerning Crédit Agricole S.A. customers and more generally of the Group;
- Always obtain the express written authorisation of customers when you need to transmit a piece of confidential information that concerns them;
- Only share confidential information within Crédit Agricole S.A. 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 unauthorised use and access;
- If you have any doubts about the information you want to diffuse on the social media, ask your manager or Compliance Manager beforehand.

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 any information that could harm customers, your company, your function or the Crédit Agricole Group on the social or other media.

EXAMPLES

When travelling in public transport can I take advantage of the time to get on with my work?

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 email it to them?

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 ▶

DEFINITION

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 Company 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, Crédit Agricole S.A.'s image and reputation are at stake.

I must do

- Make sure you are kept informed on these topics 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 anti-terrorist financing procedures;
- Pay particular attention to ensure you know as much as you can about your customers when they open an account and throughout their 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 identifies of the originators or the beneficiaries;
- Refer all suspicious transactions to the Compliance department.

I must not do

- Fail to strictly apply procedures for reasons that would, for example, be commercial;
- Tell customers that they may be suspected of money laundering, or reveal such information to a third party;
- Perpetrate, advise or assist in any placement, concealment or consolidation transaction.

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 analysing 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 authorised 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 ▶

DEFINITION

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.

Crédit Agricole S.A. 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 operations exclusively for tax purposes, or to assist its customers in circumventing their tax obligations or operating in states or territories whose jurisdictions are categorised 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;
- Request authorisation from the Group Tax department, the Group Public Affairs department and the Group Compliance department, before any investment by an entity in a non-cooperative foreign state or territory;
- Remain attentive to, identify and promptly report to the Compliance Manager 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 your Compliance Manager.

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 France and have dual Franco-American citizenship. I don't think I should be considered a US citizen.

As you have dual citizenship, you are considered a "U.S. Person" with the obligations attached thereto. Unlike most other jurisdictions, liability to US taxation is attached to citizenship not place of residence. This means that US citizens living abroad must file an annual US tax return, regardless of their place of residence.

25. INTERNATIONAL SANCTIONS ▶

DEFINITION

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 S.A. and of the entire 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 banking activities. Crédit Agricole S.A. does not tolerate any breach of international sanctions.

I must do

- Become well acquainted with, understand and comply with the Group's internal policies and procedures;
- Complete the annual training sessions which are mandatory for all employees;
- Remain attentive to, identify and promptly report to the Sanctions Manager of the Compliance department 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;
- Monitor the compliance of operations with international sanctions;
- If in doubt, contact your Compliance Manager.

I must not do

- Participate in any financial transactions that do not justify their complexity;
- 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 Franco-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 Human Resources department of your status. In addition, you must read the technical note on this subject carefully. This is to ensure your compliance with the legal provisions of the Office of Foreign Assets Control (OFAC) that concern you and, in the exercise of your duties, comply with the international sanctions decided by the United States.

26. PREVENTION OF FRAUD ▶

DEFINITION

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 organisation.

In the case of the infringement of laws, regulations or internal rules, fraud is characterised by the infringements of the rights of others and the total or partial concealment of an operation, a set of operations 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 (customers or otherwise), 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 characterised 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 Compliance Prevention unit of the Compliance department 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 your IT contact;
- If you are a manager, you should evaluate the risk of fraud attached to your activities, and enforce the principles of good conduct as well as the general professional rules;
- 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 IT contact 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 ▶

DEFINITION

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

If confidential information relating to a listed company is made public, this "insider" information may influence the market price of the financial instruments concerned or those related to them. Confidential information 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 mean that people privy to insider information must comply with the insider information management mechanism set up within their entity.

The barriers also ensure the strict control of exchanges between people who, because of their function, have access to insider information, and those who do not. In particular, this involves the physical separation of people carrying out sensitive activities or functions from those who don't.

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 Manager;
- Immediately report any transaction where there is a suspicion of market abuse to the Compliance department, which, after analysis, will decide whether or not it is appropriate to report the transaction to the Financial Markets Authority (''Autorité des Marchés Financiers'' AMF in France);
- 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 authorised 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 perform any financial transactions on these two stocks knowing that the information was not directly and clearly given to me?

No. The Financial Markets Authority (''Autorité des Marchés Financiers'' AMF in France) considers that an "insider" is any person who obtains insider information in the course of his or her duties, profession or by any other means.

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 a malicious individual.

28. USING SOCIAL NETWORKS ▶

DEFINITION

The term «social networks» 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, mastering 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 Company, its directors 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 France;
- 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 Communications department;
- If in doubt about the nature of the information, do nothing and ask your manager.

I must not do

- Carry out your business activity on the social media without having obtained authorisation from your manager or having carried out a risk analysis;
- Express yourself officially on behalf of Crédit Agricole S.A. if you are not a spokesperson appointed by the Communications department;
- Make any remarks that could harm your position or Crédit Agricole S.A. and its employees;
- Make comments such as malicious criticism or insults, or remarks of a disparaging, defamatory or indiscreet nature or divulge any confidential information;
- Use information that is protected by Crédit Agricole S.A. copyright without having obtained prior written consent from the relevant department or, failing that, from the Communications department.

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 authorisation 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 open a MOCCA community 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 but do not share any confidential information or mention any of your «sensitive» duties.

CODE OF CONDUCT

2C - 2018 - Internal use only.

CRÉDIT AGRICOLE S.A.