



Code of Conduct



Xavier Musca,
Chief Executive Officer of Crédit Agricole CIB

Crédit Agricole has an Ethics Charter common to all Group entities. It presents our commitment to proximity, responsibility and solidarity as well as our values and principles of action towards our customers and stakeholders: employees, suppliers and service providers, government representatives, charities and NGOs, shareholders and investors.

The Code of Conduct presented in this document is the variation of the principles of this charter for Crédit Agricole CIB. Designed to better explain our professional obligations and to enable us to adopt behavior consistent with the ethics and values of the Group, it applies to all Bank employees in all our locations around the world.

Ethics and compliance are a real opportunity for the Bank to convey a positive image as a responsible entity, and contribute to preserving the trust of our stakeholders.

I count on everyone's commitment to embody these principles on a daily basis. This is how we will build a sustainable future for Crédit Agricole CIB.



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1

OUR COMMITMENTS

Crédit Agricole has an Ethics Charter common to all Group entities. It presents our commitment to proximity, responsibility and solidarity as well as our values and principles of action towards our customers and stakeholders: employees, suppliers and service providers, government representatives, charities and NGOs, shareholders and investors.

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Ethics and compliance are a real opportunity for the Bank to convey a positive image as a responsible entity, and contribute to preserving the trust of our stakeholders.



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HOW TO USE OUR CODE OF CONDUCT

CRÉDIT AGRICOLE CIB'S CODE OF CONDUCT EXPLAINS OUR PROFESSIONAL OBLIGATIONS AND THE BEHAVIOR THAT COMPLIES WITH THE ETHICS AND VALUES OF CRÉDIT AGRICOLE CIB AND THE CRÉDIT AGRICOLE GROUP.

To whom does the code apply?

The Code of Conduct applies to all, regardless of their seniority or function within Crédit Agricole CIB - to Board members, managers and employees, both in France and abroad.

What are its objectives and how should the code be interpreted?

The Code of Conduct was designed to guide our actions and to help us make decisions in accordance with the law, our ethical standards and our values. By topic, it explains the professional behavior to be followed and promoted when carrying out our duties and in our working relationships. The topics are organized in four sections: "customer and supplier relations;" "social, environmental and societal issues;" "anti-corruption;" and "protecting Crédit Agricole CIB and its reputation". Please note that conflicts of interest, which is a cross-functional topic, is covered in the anti-corruption section.

Practical cases illustrate the principles presented in the Code.

However, the Code of Conduct is not intended to be entirely comprehensive. It does not purport to provide answers to all questions or address all possible scenarios, particularly with regard to what you must do and must not do. Therefore, in all situations and when making decisions, everyone should ask themselves the following questions:

FIVE QUESTIONS TO ASK TO ENSURE ETHICAL BEHAVIOR



- 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 was made public, both internally and externally?

If the answer to any of these questions is "no," or if in doubt, you must discuss before taking action. You may discuss this with your manager, or contact Compliance, Human Resources, Corporate Social Responsibility, Legal or any other department qualified to deal with the issue and you must keep a record of all problems encountered.

Who supervises the implementation of the Code? Who updates it?

A multi-disciplinary team is responsible for implementing, monitoring and updating the Code of Conduct. The Board of Directors receives a report on this process. The substance of the Code may change over time. The Code does not replace the internal regulations and procedures of Crédit Agricole CIB. It is your duty and responsibility to consult and apply them.



How is the Code of Conduct made available?

The Code of Conduct is a public document and is shared with all stakeholders. It is available on the internal and external website of Crédit Agricole CIB.

What does it mean on a daily basis for employees?

We must all be aware of the principles set out in the Code of Conduct and respect them when performing our daily duties.

In addition, we adopt and promote the values and principles presented in the Code of Conduct, with vigilance and good intentions.

Lastly, it is compulsory to complete the Code of Conduct training courses.

One key rule to remember: whenever you notice or suspect inappropriate action or behavior, or if you feel under pressure, you must immediately discuss it with your manager or the Compliance, Human Resources, Corporate Social Responsibility, Legal or any other department qualified to deal with the issue.

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 has been set up and describes how suspected improper conduct can be reported, including using the whistleblowing tool. This tool enables reporting concerns in a confidential and secure manner.

Manager roles and expectations

As a manager, you must ensure that 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 must be in a position to explain to your team how and in which areas the Code of Conduct applies to them.

If you have any questions, do not hesitate to consult the department that is most qualified to deal with the issue at hand (Compliance, Human Resources, etc.).

You must be vigilant, act transparently, and be an example to your teams. Show that it is entirely possible to attain the objectives that have been set, while respecting the ethics and values of Crédit Agricole CIB and of Crédit Agricole Group.

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OUR EVERYDAY ETHICAL PRACTICES

DEFINITION

Ethics refers to values of the company. These values should drive our decisions and our professional behavior. Expressed as professional rules of conduct underpinning our activity, they define our ethical approach.

DETAILS

Ethics refers to:

- company-specific values formulated as general concepts (for example, respect for others, solidarity, etc.) and developed into the Company’s “principles of action” (for example, combating discrimination);
- the approval and adoption of these values and the ethical framework by the highest level of corporate governance;
- a general mission to promote and enforce the values, principles and rules of conduct, in such a way that the ethical framework creates a feeling of belonging, and promotes good working relationships with various 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 promotes 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 prioritizing customers’ interests, respecting the principle of fair and equitable choice of suppliers and the rules of competition.

RESPECTING INDIVIDUALS

Human rights and people’s fundamental social rights must be rigorously applied in all relations between Company employees and stakeholders. 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 are principles that create a favorable working environment, which in turn leads to efficiencies and work satisfaction.

RESPECTING THE COMPANY’S ENVIRONMENTAL AND SOCIETAL COMMITMENTS

For Crédit Agricole CIB, this means being useful to our customers and society, playing our role in the fight against global warming by supporting them in their transition. With the ambition to remain a reference in this area by supporting our clients towards a less carbon-intensive and more sustainable economy through our financing and advice, particular attention is paid to “Sustainable Finance”.

Each director, executive and employee is involved in the CSR (Corporate Social Responsibility) process of supporting this transformation and integrating the issue of climate change and social cohesion into the heart of its activities.

PREVENTING AND DETECTING CORRUPTION AND INFLUENCE PEDDLING

The fight against corruption is a major objective related to the common good and which is based on the values of honesty, integrity, loyalty, transparency and 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 DILIGENT 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 conflicts of interest. We must also ensure that we do not, for our own account or on behalf of a third party, inappropriately disseminate or exploit any confidential information.

All must be vigilant to enable us to protect the interests of our customers, prevent money laundering and the financing of terrorism, respect the law on international sanctions, prevent tax evasion, prevent fraud and protect the integrity of the market.

REFRAINING FROM CARRYING OUT ANY ACTIONS THAT COULD DAMAGE CREDIT AGRICOLE CIB’S REPUTATION

We are all responsible for the internal and external image of Crédit Agricole CIB and of the Group. The risk of negative publicity, particularly on social networks, could potentially damage Crédit Agricole CIB’s brand and erode the trust our customers place in our Group.

To avoid this, we must 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 our professional environment or help spread rumors.

Our rules of conduct regarding customer and supplier relations



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1. RELATIONS WITH CUSTOMERS

DEFINITION

Crédit Agricole CIB provides institutional and corporate clients with innovative financing and investment solutions to meet their specific needs, performance objectives and risk profiles. The Company places the trust and satisfaction of its customers at the heart of its project. Crédit Agricole CIB wants all of its employees to be involved in this relationship while 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.

CREDIT AGRICOLE CIB'S COMMITMENT

To ensure that its customers' expectations are fulfilled, Crédit Agricole CIB carries out satisfaction surveys and a range of studies with all of its customers. To continuously improve our services and to strive for excellence in our customer relationships, customer complaints are processed by the competent teams. Training is regularly provided to employees whether or not they are in direct contact with customers. Crédit Agricole CIB has also chosen to be part of Crédit Agricole Group's initiative, which periodically measures the Customer Recommendation Index.

Crédit Agricole CIB aims to make a strong commitment to its institutional customers by adopting a holistic approach to its own corporate issues and its environment.

Crédit Agricole CIB is committed to forging close relationships with distribution networks and their advisory teams, and ensures that all its employees have the appropriate tools and information.

Finally, acting as a responsible financial player is a fundamental commitment from Crédit Agricole CIB to its clients. The environmental and social impacts, both positive and negative, generated by the Bank's activity appear to be much greater than its direct footprint. This is why taking these impacts into account is one of the main sustainable development challenges for Crédit Agricole CIB. Our action aims to increase the positive impacts and reduce the negative impacts related to our financing and investments.

EXAMPLES

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

To determine your target clientele, ensure that the customer's 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 NAP Committee imposed a condition. Knowing that there are competitors and that 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 to ensure that customer interests are protected and to avoid marketing products that could cause them harm. If, after verifying the risks and compliance of the product, 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 met.

2. CUSTOMERS' PERSONAL DATA

DEFINITION

In addition to complying with regulations (e.g. the French Data Protection Act, which was amended following the entry into force of the European GDPR regulation in 2018), the Crédit Agricole Group has drawn up a charter on the use of customers' personal data. This Code provides a reference framework for all Group employees, including those at Crédit Agricole CIB, in France and abroad, who process this type of data. It reiterates the commitments made by the Group as well as best practices to be observed.

CREDIT AGRICOLE CIB'S COMMITMENT

Crédit Agricole CIB has taken a firm stance on the sensitive subject of personal data, by undertaking to prioritize data security, use data in the interest of its customers, act in an ethical and responsible manner, and adopt a transparent and pedagogical approach towards its customers so that clients can control their data and the use that is made of it.

EXAMPLES

My team implements a tool that leverages our customers' personal data. My understanding is that following GDPR there is no prerequisite to inform the CNIL. But who should I share this information with?

Since 2018, the European Data Protection Regulation requires companies to keep a register of personal data processing activities. As an operational Data Controller, you must record the characteristics of your new processing in this register and regularly update it. The DPO is there to assist you.

I would like to use my customer database to launch a new product marketing campaign but I don't know if my customers have given their consent for their data to be used for this purpose. Do I have the right to do this?

Even if the data is already stored in the customer database, you may only use it for the purposes for which it was collected and only used it for e-mail campaigns if customers have given their consent. Check that you have your customers' consent to use their data in this way. Refer to the best practices and the guidance on interpretation presented in the Crédit Agricole Group's Personal Data Code. Ask for advice from our experts in the Legal, Compliance and/or IT Security departments. In addition, obtain the express agreement of your customers before issuing any type of commercial invitation.

I MUST

- 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, provide clear and accurate information that is not misleading and support them appropriately;
- Ensure that all offers put on the market for customers have been analyzed and validated within the framework of the NAP (New Products/New Activities) process, particularly complying with the applicable regulations, and in particular concerning customer information and the suitability of the product for their needs;
- Be vigilant to prevent all forms of fraud in order to protect customers, prevent money laundering, 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

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

I MUST

- At the start of an IT project, involve the Chief Information Security Officer (CISO) and the Data Protection Officer (DPO) to ensure that all personal data-protection rules are respected;
- Ensure the project complies with the principles of the Code: security, integrity and reliability, ethics, transparency and education, etc.;
- If in doubt, always contact the CISO or the DPO.

I MUST NOT

- Promote a project involving the processing of personal data without having checked with the DPO or the CISO that the project is compliant;
- Fail to follow the main principles set out in the charter for the protection of personal data;
- 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.

3. FAIR AND EQUITABLE CHOICE OF SUPPLIERS

DEFINITION

Choosing a supplier in an equitable and fair manner above all requires ensuring that all services providers are treated equally when tender offers are being processed.

DETAILS

Suppliers must be chosen further to a fair process between bidding companies that tender. The choice must be based on objective information that includes social and environmental responsibility and commercial and contractual criteria.

CREDIT AGRICOLE CIB'S COMMITMENT

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 Crédit Agricole CIB, which would be affected, and the choice must be objectively assessed.

This implies that buyers, decision-makers and/or any other employees of Crédit Agricole CIB adopt a responsible and fair attitude to the bidding companies throughout the duration of the call for tender. As such, you should not take individual interests into consideration when selecting the successful bidder.

In addition to adopting a responsible and fair attitude as a buyer during the tender process, all Crédit Agricole CIB employees must negotiate with bidders in good faith.

The obligation of good faith in the pre-contractual phase is now a legal and legislative requirement and is no longer left to the discretion of the courts.

This means that either party can unilaterally break off negotiations at any time, provided that it does so in good faith and in a fair manner.

EXAMPLES

I heard that during negotiating periods, no gifts should 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 Crédit Agricole CIB buyer so that it could be included in the list of companies to be interviewed in the context of a call for tenders. Is this the right approach?

First of all, you have to summarize what you need then draft specifications. A potential supplier cannot perform this task since they may be inclined to propose their solution, tools or services, which might not correspond exactly to your needs.

In order to find the supplier that best suits your needs, with the help of a buyer in Crédit Agricole CIB, you must draw up the list of companies to be interviewed, and a buyer should assist throughout the interview process (and subsequent post-interview phases).

4. RESPONSIBLE RELATIONS WITH SUPPLIERS

DEFINITION

Reasonable due diligence is necessary to ensure that all actors in the procurement process act in accordance with a certain number of commitments and principles, notably concerning respecting human rights and fundamental freedoms, complying with workplace regulations, combating all forms of discrimination, the promotion of diversity and the protection of the environment and business ethics. Failure by any player in the supply chain to act in accordance with these commitments and principles could seriously impair Crédit Agricole CIB's performance, reputation or image.

CREDIT AGRICOLE CIB'S COMMITMENT

The commitments and principles of Crédit Agricole CIB include:

- financial equality: remunerating suppliers in compliance with applicable laws and regulations;
- equal treatment of suppliers
- transparency of our processes;
- promoting sustainable and balanced relationships;
- 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;
- monitoring the supplier's state of economic dependence.

The diversity of these commitments and principles applies not only to buyers, but also to all Crédit Agricole CIB employees involved in a relationship with a supplier.

EXAMPLES

I want to launch a call for tenders. What period should suppliers be given to prepare their response?

Suppliers need a minimum amount of time to read our specifications by mobilizing their commercial and operational resources, to ask us questions and finally to formulate a precise answer in terms of content and price. For the simplest consultations, such as looking for a single consultant, one week to respond is possible. In most cases, we allow a response time of 2 to 4 weeks, or even 6 weeks for the most complex cases. The less time we have to respond, the more we favor large suppliers with large sales teams or who have been able to respond to similar calls for tender before.

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 its revenue comes from Crédit Agricole CIB. Is there a risk?

If the level of dependency exceeds 25%, in order to assess the risks, the buyer must analyze the financial health and the service provider's degree of economic dependency and propose alternative solutions. Should the service come to an abrupt halt, the risk incurred could be financial, operational or legal.

I want to replace a services provider and terminate its contract before it expires.

The buyer will indicate the period of notice to be respected and, depending on the supplier's level of dependency and the duration of the business relationship, propose exit conditions that will allow the service provider to maintain its financial stability while it reorganizes its business.

I MUST

- Carefully prepare the list of companies to be interviewed to ensure that they have a comparable level of knowledge and resources;
- 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.);
- Ensure that all companies interviewed have enough time and the same amount of time to respond and, to this end, distribute the tender documents once they have all been identified without adding new companies during the tender process;
- Ensure that all bidding companies receive the same initial and modified information, data and documentary materials (tender terms and conditions, technical and operating specifications, contractual obligations, 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 the sessions must be identical for each company interviewed;
- Ensure and respect the confidentiality of the discussions and decisions to which the decision-makers and the Crédit Agricole CIB buyer have access during all stages of the call for tender process;
- If negotiations break down at an advanced stage, it is advisable to warn the partner as far in advance as possible and to supervise the breakdown;
- In general, act in a transparent manner throughout the tender process.

I MUST NOT

- 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;
- Do not end negotiations overnight without first informing the tenderer of the intention to terminate the discussions;
- Change the selection criteria, and/or the ranking weighting, after the date of receipt of the replies to the call for tenders.

I MUST

- 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 sufficiently senior to guarantee the entire purchasing process and to 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 bids submitted by the suppliers interviewed, taking into account all of the selection criteria and factoring in overall costs;
- When changing supplier, provide a reasonable period of notice in order to give the former supplier a viable and acceptable termination period;
- Prevent situations that could harm sustainable and balanced relationships with suppliers;
- Alert employees to the precautions to be taken in the event of proven economic dependency on a supplier;
- Provide all of the information needed to approve invoices and thereby help meet the payment deadlines set by regulations.

I MUST NOT

- Incur expenses with a supplier on behalf of Crédit Agricole CIB without receiving formal authorization to do so (see delegation of powers);
- During discussions with a supplier, disclose and supply any information related to Crédit Agricole CIB strategy or any other sensitive data that would not be publicly available;
- Validate the receipt of services without following up supplier invoice processing and payment and, in particular, compliance with payment deadlines set by regulations;
- Fail to carry out a preliminary analysis of the financial health of a supplier during the selection process or take into account all the criteria that could lead to the supplier becoming economically dependent at the beginning and throughout its business relationship with Crédit Agricole CIB.

5. COMPETITION

DEFINITION

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

DETAILS

Many practices can hinder free competition, such as cartels, abuse of a dominant position and abuse of economic dependency.

A cartel is an agreement, concerted behavior or planned and intentional collaboration whose purpose or effect, even potentially, is to prevent, restrict or distort normal competition. It may be oral, written, formal or informal.

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 consists of adopting behavior aimed at eliminating, coercing or dissuading any competitor from entering or remaining in a market, thus distorting competition: for example, by adopting pricing policies or commercial practices that prevent, restrict or distort normal competition.

Abuse of economic dependency entails abuse of a business partner's economic dependency, with actual or potential effects on the functioning or structure of competition in the market.

Lastly, certain practices deemed to restrict competition are, for this reason, prohibited regardless of their actual impact on the market. These are called restrictive practices and include obtaining unwarranted or disproportionate advantages, significant imbalance and abrupt termination of established commercial relations.

CREDIT AGRICOLE CIB'S COMMITMENT

All Crédit Agricole CIB activities must be carried out in compliance with competition law, one of the basic principles being that companies operating in a market must determine their strategy in an autonomous manner. Cartels and abuse of a dominant position are therefore strictly prohibited.

Any exchange of so-called sensitive information is 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 some information with competitors of Crédit Agricole CIB as soon as it is made public and when it relates to a topic of general interest for the profession or is within the framework of trade associations. The information provided will be considered as a whole rather than considered individually (e.g. when statistics are provided).

EXAMPLES

On Crédit Agricole CIB's behalf, I sometimes have to participate in meetings or discussions with a professional association. Which topics do I have the right to discuss and what precautions should I take?

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

In instances when the topic could be qualified as anticompetitive, remember that even passively attending a meeting 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 minuted. Do not hesitate to seek help from the Legal department to find out what attitude to adopt before, during and after such meetings.

What precautions should be taken if I am representing Crédit Agricole CIB in a consortium of asset managers or investors?

Participation in such a consortium must be justified by objective professional reasons related to Crédit Agricole CIB business, must be authorized by your line manager and must not breach anti-competitive legislation. Coordination between those who are part of the consortium must be strictly limited to the needs of the project for which it was formed. Make sure that coordination never moves beyond this process and that the minutes reflect this unequivocally.

If as a Crédit Agricole CIB representative I am negotiating a contract with a commercial partner, what precautions should I take?

You must ensure that the conditions you intend to impose on the partner do not create an abusive imbalance between the partner and Crédit Agricole CIB. A clause is unbalanced when it imposes a significant obligation without sufficient reciprocity or without adequate compensation.

Our rules of conduct regarding social, environmental and societal issues



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I MUST



- Avoid addressing sensitive issues when interacting with third parties outside Crédit Agricole Group, regardless of the context;
- If such topics are introduced, terminate the conversation and promptly inform your manager, the Compliance department and the Legal department;
- If you are not sure if information is sensitive, check with the Compliance department and the Legal department before any conversation with a competitor or a professional organization;
- 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 effect on the market in question.

I MUST NOT



- Consult with a competitor or share information on the price of service ;
- 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 first seeking advice from the Legal department.



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 personal data is precisely regulated according to principles that apply to employees as well as to any other person.

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

For more information on the protection of employees' data, you can refer to Crédit Agricole CIB's Personal Data Protection Charter.

CREDIT AGRICOLE CIB'S COMMITMENT

In a context where people are being increasingly required to communicate their personal data in paperless form, the Crédit Agricole Group has drawn up a 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 CIB adheres to the same process and guarantees its employees the protection of their personal data and respect for their privacy.

EXAMPLES

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

It is imperative that you report this theft to your manager as well as to the Crédit Agricole CIB Security Officer who will inform the Data Protection Officer (DPO). In addition to the company information contained on your computer, you have copied personal data which can have serious consequences and cause significant harm to both the company and its employees.

Never copy any personal data onto your computer or external devices, particularly when the data has not been encrypted. To ensure personal data is secure, it is essential that you respect the internal rules and procedures.

7. HEALTH AND SAFETY AT WORK

DEFINITION

Companies must take the necessary steps to ensure the safety of 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.

CREDIT AGRICOLE CIB'S COMMITMENT

Everyone working for or with Crédit Agricole CIB must be able to achieve their full potential in a safe and secure environment. Crédit Agricole CIB 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.

EXAMPLES

I have noticed a change in behavior of a colleague of mine: he seems stressed, isolates himself, has eaten 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.

I MUST



- Ensure the appropriateness and relevance of the information collected;
- Ensure the lawfulness, integrity and transparency of employee data processing;
- Ensure that each use of personal data is recorded in the personal data processing register, in accordance with internal procedures;
- Inform employees about 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;
- Ensure that services providers respect these same principles in the event of subcontracting.

I MUST NOT



- 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;
- Preserve personal data without any authorization;
- Preserve data after the planned retention period.

I MUST



- Become acquainted with and respect Crédit Agricole CIB's health and safety rules;
- Make sure that your actions and conduct present no risk to you or other people;
- Ensure safety and security in the workplace. This includes participating in safety drills and training programs organized by the Company, and reporting any situation that could constitute a risk to security and safety in the workplace to the Human Resources department;
- Contact the Occupational Health Service if necessary.

I MUST NOT



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



8. NON-DISCRIMINATION

DEFINITION

Discrimination is a form of unequal treatment that is based on a prohibited criterion and is prohibited by law. More specifically, discrimination is the act of distinguishing someone based on a set of criteria or distinctive characters.

DETAILS

The French law defines discriminatory behavior based on criteria including origin, gender, family status, pregnancy, physical appearance, place of residence, state of health, disability, morals, sexual orientation, age, political opinion, actual or alleged membership or non-membership of an ethnic group, nation or alleged race, the exercise of an elective office and religious beliefs.

Discrimination can be direct:

Direct discrimination refers to any practice leading to unfair treatment related to employment, training, promotion or any other aspect of working life.

Or indirect:

Indirect discrimination refers to any practice that although seemingly neutral, puts an individual at a disadvantage vis-à-vis others because of their sex, age, a disability or other characteristic.

CREDIT AGRICOLE CIB'S COMMITMENT

Crédit Agricole CIB is a diverse company, convinced that ensuring the integration of employees, revealing their talent and promoting a diverse pool of people will strengthen the company and promote its growth.

This conviction is combined with respect for the principle of equal opportunities, which underpins all HR actions. Crédit Agricole CIB considers that any discriminatory behavior is unacceptable and deprives everyone of the respect they are entitled to. To combat stereotypes and to avoid decision-making biases, Crédit Agricole CIB is committed to raising awareness among leaders, managers and employees of the challenges of non-discrimination.

Employees in the Human Resources department and managers must undergo "Recruit without discrimination" training as soon as they take up their position in order to raise their awareness of good practices in this area.

EXAMPLES

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 agreed with the manager and take into account the proper functioning of the service in question. If necessary, you must be able to objectively justify your refusal to accept a request for leave.

9. DIVERSITY AND GENDER EQUALITY

DEFINITION

The Company's corporate diversity policy is based on a set of proactive principles and actions that are aimed at developing and promoting a variety of profiles. Depending on the national regulations in force, companies may be required to comply with obligations.

DETAILS

In France, companies with 50 employees or more must agree to promote gender equality at work or 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 to prepare an action plan to reduce the discrepancies identified, and to monitor and promote equality in the workplace.

In France, disabled workers must constitute 6 per cent of the company's total workforce and they must be employed on a full-time or part-time basis. If companies do not fulfill this obligation, they must pay a contribution to the URSSAF / MSA social agencies to which they belong. This contribution will be used to finance a fund for the professional integration of disabled people.

CREDIT AGRICOLE CIB'S COMMITMENT

Crédit Agricole CIB is a diverse company that believes that ensuring integration, promoting talent and encouraging diversity, are key driving forces underpinning the Company's development. Promoting gender diversity is about creating an open and responsible corporate culture that fosters internal cohesion and progress.

This commitment is reflected in concrete actions, such as studies carried out to measure the pay gap between women and men, compensating employees to reduce unjustified pay differences and recruiting people with disabilities.

EXAMPLES

Most of the people in my team are men. One of my staff is retiring in a few weeks and I am thinking about replacing him/her 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 has a disability. 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 consult your Human Resources contact. If necessary, actions may be implemented to ensure that the integration of the new employee into your team is carried out in the best possible way.

I MUST



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

I MUST NOT



- 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 environment that leads to discrimination;
- Ignore a situation of discrimination, whether you are the victim or witness, regardless of the reason or the consequence.

I MUST



- 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



- 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.



10. PREVENTING HARASSMENT

DEFINITION

Harassment is defined as any unwanted or unsolicited behavior or conduct directed towards an individual (or group of individuals) which, by its severity and/or perseverance, is likely to create a hostile or intimidating environment and to negatively affect the targeted individual's involvement in their work. Harassment can be "moral" and take the form of derogatory remarks, humiliation, bullying, intimidation or insults. Sexual harassment is the act of repeatedly imposing behavior of a sexual nature or sexist comments to an individual which undermine their dignity because of the degrading or humiliating nature of the behavior or which create an intimidating, hostile or offensive environment.

Sexual harassment shall also include the use, even if not repeated, of any form of serious pressure for the purpose 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.

CREDIT AGRICOLE CIB'S COMMITMENT

Crédit Agricole CIB is committed to preventing, detecting and resolving harassment and such conduct will be severely punished.

In France, every company with at least 250 employees has a designated representative responsible for guiding, informing and supporting employees in the fight against sexual harassment and gender-based violence. The Crédit Agricole CIB Global Behaviors Charter is available on the CACIB Intranet. Your contacts are included in this charter. If necessary, you can also reach out to your usual contact within the Human Resources department.

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.

EXAMPLES

A colleague of mine is being repeatedly subject to criticism of their work in front of the rest of the team in a humiliating way, . 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 rapidly take action to put an end to this harassment.

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

Quickly report this unacceptable behavior to your manager or Human Resources contact in order to alert them to this unacceptable behavior. 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. Multi-activity 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

Being an employee does not prevent you from being self-employed. Accumulating activities is possible since salaried jobs are the only activity that is subject to working time regulations. As a result, for example, employees can exercise an activity in a social form (non-profit association).

However, while the principle is the freedom to work, employees must respect their employers' professional Code of Ethics. 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.

EXAMPLES

I am being asked to join an investment advisory association, can I respond positively?

You must inform your manager and send your request to the Compliance department so that it can assess any potential conflicts of interest. You may be asked to decline this request.

I MUST



- 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



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

I MUST



- 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



- 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 set by your salaried activity or generate conflicts of interests;
- Exercise your extra-professional activity during the working hours as defined in your contract;
- Use the equipment and resources put at your disposal by your employer for your extra-professional activities.



12. SOCIETAL AND ENVIRONMENTAL STRATEGY

DEFINITION

The European Commission defines Corporate Social Responsibility (CSR) as the voluntary integration of societal and environmental concerns into the business activities of companies and their relations with their stakeholders.

In other words, CSR is companies' contribution to sustainable development.

DETAILS

To contribute to sustainable development, companies commit to:

- Take into account stakeholders' expectations;
- Fully meet their legal obligations or going beyond them;
- Integrate this responsibility across the organization and implement it in all internal and external relations.

CREDIT AGRICOLE CIB'S COMMITMENT

Crédit Agricole CIB is committed to a fair climate transition, which translates into two main ambitions in its business and in the way it operates:

Developing sustainable investments and supporting clients to help them meet their environmental challenges, in particular:

- financing investment solutions and services that have an environmental dimension;
- gradually reallocating its financing towards low-carbon activities in the various sectors of activity;

Reducing its direct environmental footprint, in particular by:

- continuously improving the energy efficiency of its buildings and reducing energy consumption;
- reducing the production of waste from its sites and optimizing its recovery;
- integrating environmental requirements into supplier selection;
- reducing emissions related to business travel.

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. This commitment is historic and long lasting.

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

Given our drivers and objectives, we are determined to play a particularly important role in the fight against climate change. Indeed, in the service of the real economy, our decisions can steer industrial projects towards more virtuous techniques. Our role is to support the energy transition to a low-carbon economy.

In addition, our environmental policy is fully integrated into all of our activities and businesses. It is a source of innovation that serves our customers and society. Finally, our operations (construction and operation of our buildings, movement of employees, impacts due to the operation of our IT, sorting of our waste) can be further improved in order to reduce our environmental footprint.

I MUST



- Take action and take into consideration the direct and indirect impacts on the environment generated by my work;
- Commit to contributing to the Group's role as a supporter of the climate transition and as an influencer for a more sustainable economy, particularly in my dealings with customers and stakeholders, and in any speeches I may make externally.

I MUST NOT



- Ignore the Group's climate transition objectives and commitments;
- Believe that Crédit Agricole CIB is not concerned with the environment.

Ours rules of conduct regarding anti-corruption



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13. PREVENTION OF CORRUPTION

DEFINITION

Corruption occurs when a person in a private or public office 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, on their personal behalf or for a benefit of a third party.

DETAILS

For more information on the fight against corruption, you can refer to Crédit Agricole CIB's Anti-Corruption Code of Conduct.

CREDIT AGRICOLE CIB'S COMMITMENT

We have a zero tolerance policy regarding corruption. No employee may engage in bribery in any form and for any reason whatsoever.

Corruption is immoral, hinders free competition and harms economic development. It can have very serious financial, commercial and criminal consequences, which could seriously damage the reputation and image of the Crédit Agricole CIB. Any employee involved in corruption corrupt act is also exposed to disciplinary actions or even criminal sanctions.

EXAMPLES

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

It is prohibited to take advantage of your position or duties to receive gifts or benefits. Immediately alert your manager, the Compliance department, and the Purchasing department.

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

Politely decline the offer. To preserve the independence of Crédit Agricole CIB and its employees, it is not possible to allow a third party to pay for all or part of a trip, even a business trip.

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 report this to the superior of the person who made the request.

14. PREVENTION OF INFLUENCE TRAFFICKING AND INTERACTIONS WITH PUBLIC OFFICIALS

DEFINITION

Influence peddling is when, directly or indirectly: a person with public authority who is entrusted with a public mission or an elected public official offers, promises, makes donations, provides gifts or any advantages for himself or for others to perform or refrain from performing an act that falls within the remit of his function ; or facilitates such acts ; or abuses his real or alleged influence to obtain awards, jobs, contracts or any other favorable decision from a public authority.

DETAILS

For more information on the fight against influence peddling and interactions with public officials, you can refer to Crédit Agricole CIB's Anti-Corruption Code of Conduct.

CREDIT AGRICOLE CIB'S COMMITMENT

Our policy is clear: employees are strictly prohibited from engaging in influence peddling, whatever the form or reason.

All employees must conduct their business in accordance with the anti-corruption laws applicable in the countries in which we operate.

Gifts, benefits or public relations activities offered to public officials are strictly prohibited. Some activities involving public officials require particular vigilance.

EXAMPLES

To open a subsidiary in a foreign country, we must obtain specific approval. An employee of a government department in this country proposes to influence the person in charge of granting the approval and offers to pay part of the requested amount into a bank account. What should I do?

Refuse and notify your manager as soon as possible and seek advice from your Compliance manager to avoid becoming involved in a corruption process.

I MUST



- In order to combat corruption effectively, proven cases or attempts, whether internal or external, must be reported as soon as they are discovered by an employee to their manager or to the Compliance department using the eppf@ca-cib.com email address or by whistleblowing in the appropriate circumstances;
- Internally declare gifts and benefits offered or received, in accordance with the provisions pre-established by Crédit Agricole CIB (cf. 17. Gifts and invitations);
- Comply with existing procedures for approving expenses incurred by employees;
- Be alert constantly and monitor relations with intermediaries and suppliers;
- Comply with the recruitment policies defined by Crédit Agricole CIB ;
- Ensure that all payments are properly justified, documented and authorized.

I MUST NOT



- Offer, promise or agree to give a benefit (financial or otherwise) to a third party, for the purpose 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;
- Favor a third party in calls for tenders;
- Offer or accept gifts and benefits other than those that have been authorized;
- Allow all or part of a trip to be paid for by a third party, including business trips;
- Favor a supplier or service provider on the basis of non-objective criteria (prices, services, quality, reputation, etc.), outside of Crédit Agricole CIB's purchasing policy, for personal reasons (friends, family, etc.);
- Conceal elements of corruption or acts likely to constitute it from a manager or supervisor, in charge of an internal or external audit, or from a control body.

I MUST



- The employee must report proven cases or attempts of influence peddling, whether internal or external, to their manager or to the Compliance department or by whistleblowing in the appropriate circumstances;
- 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



- Offer, promise or consent to giving a benefit (financial or otherwise) to a public official, for the purposes of inducing them to improperly perform or refrain from performing an act;
- Favor a relative of a public official within the context of a call for tenders or recruitment process;
- Give cash to public officials.



15. PREVENTION OF FACILITATION PAYMENTS

DEFINITION

Facilitation payments are small payments made directly or indirectly to civil servants and/or public officials to expedite or guarantee, in the normal course of business, the performance of a routine action to which the payer is entitled. These payments are made in particular in connection with processing a visa application, issuing an authorization, permit or license or customs formalities.

DETAILS

For more information on the prevention of facilitation payments, you can refer to Crédit Agricole CIB's Anti-Corruption Code of Conduct.

CREDIT AGRICOLE CIB'S COMMITMENT

These payments are strictly prohibited. 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 properly identified and recorded in the Company's accounting records and documents.

EXAMPLES

In order to obtain a permit as part of the development of a real estate construction program, an official offered to speed up the process of obtaining a permit, which usually takes several months, in exchange for a bonus. Do I have to pay?

No, because this amount is not a legitimate expense. Inform your manager or Compliance manager as facilitation payments can be considered acts of corruption.

I have to travel on business to a country for which I need a visa. At the embassy, the officer informed me that the time it takes to obtain the visa is longer than I had expected. He suggests that I speed up the process if I pay him the sum of €1,000. What should I do?

To avoid any act of corruption, politely decline this offer and inform your manager or the Compliance manager without delay.

16. CONFLICTS OF INTEREST

DEFINITION

Where an employee's personal interests may conflict with those of a client or an entity.

In other words, a conflict of interest is any professional situation where the discretion or decision-making power of a person, company or organization in terms of its independence or integrity may be influenced or altered by personal considerations or under pressure from a third party.

Conflicts of interest include those of a personal, professional, financial and political nature.

DETAILS

Financial institutions must formally supervise the management of conflicts of interest that may arise in the course of their activities. To this end, they must maintain and enforce effective organizational arrangements, with a view to taking all reasonable measures to prevent conflicts of interest from affecting the interests of their clients. Respect for the primacy of clients' interests is an essential element in managing conflicts of interest.

For more information on conflicts of interest, you can refer to Crédit Agricole CIB's Anti-Corruption Code of Conduct.

CREDIT AGRICOLE CIB'S COMMITMENT

In accordance with Crédit Agricole Group's regulatory requirements and procedures, Crédit Agricole CIB has implemented a system for preventing and managing conflicts of interest. These may be acts of corruption or influence peddling and expose the Company and its employees to accusations of bias or dishonesty. They can also have consequences on the reputation and image of Crédit Agricole CIB and its employees.

EXAMPLES

My manager asks for my opinion to choose a new supplier because he hesitates between two companies. It turns out that the director of one of the companies is one of my childhood friends. What is the right attitude to adopt?

To avoid any conflicts of interest, inform your manager in writing of this relationship and withdraw from the selection process.

My brother is a service provider in a training organization, and the services he offers are competitive and match our needs. Should I avoid using his services?

Report this situation in writing to your manager, who should take all necessary measures to avoid a possible conflict of interest. In particular, do not take part in choosing the service provider.

I MUST



- Consult my manager or the Compliance manager if I receive a request for a facilitation payment from a public official;
- Alert my manager or the Compliance manager if, in the context of an exceptional situation, I 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



- 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.

I MUST



- Respect Crédit Agricole CIB's prevention principles and measures notably regarding gifts and benefits, public relations activities and extra-professional activities, to ensure you maintain your independence of judgement and avoid situations of conflicts of interest;
- Declare your elected public offices to your manager and Compliance manager;
- Declare to your manager and Compliance manager the administrative, management or executive responsibilities that you hold on a private basis in any for-profit organization (client, Crédit Agricole CIB supplier, etc.);
- Inform your manager of any personal or family ties you may have with a third party;
- Inform your Compliance manager of any potential direct or indirect conflicts of interest and abstain from participating in discussions or decision-making on the subjects concerned.

I MUST NOT



- Make decisions if my discretion or decisions could be influenced or altered by personal considerations or by pressures imposed by a third party;
- Conceal information about any conflict of interests or situations that could create such a situation;
- Acquire positions of interest in a competitor, customer or supplier.



17. GIFTS AND HOSPITALITY

DEFINITION

Corporate gifts are those that are offered in the context of business relationship. Some may be worth a significant amount (trips, electronic equipment, wine, champagne, 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 business development interactions can take the form of meals, hotel accommodation, seminars, conventions or conferences, or invitations to sporting, cultural and social events, acts in accordance with local customs. Business and press travel can also be considered as gifts and hospitality.

CREDIT AGRICOLE CIB'S COMMITMENT

Employees must not, directly or indirectly, accept gifts or invitations which may, even unintentionally, compromise their independence, impartiality or integrity. They must refuse all gifts or invitations that could place them in a conflict of 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 Crédit Agricole CIB.

For gifts and benefits accepted or granted, a maximum amount is set per business relationship and per year. If the value of the gift or benefit exceeds the maximum authorized amount (set according to local requirements), before being able to accept or grant it, the employee must notify his manager and the Compliance department, who will agree if appropriate. No gifts may be sent to the employee's home address - the employee must only provide his professional address for the delivery of gifts.

Crédit Agricole CIB does not prohibit the offer or acceptance of gifts or invitations in the context of business development. Such transactions must have a clear business justification and must be subject to prior authorization by the line management if the authorized amount is exceeded. In the event of doubt, ask the Compliance department for an opinion.

EXAMPLES

I receive a case containing six bottles of champagne at home, can I keep it and enjoy it with my family?

You must declare to your manager any gifts received at your home address. If the gift exceeds the maximum amount authorized per client and per year, you must seek the authorization of your manager who will notify the Compliance department before the gift is accepted or declined.

I work in a country where it is customary for large foreign companies to make contributions to the main political parties. Is it possible to contribute on behalf of Crédit Agricole CIB?

No. Even if this contribution is permitted by local law and custom, Crédit Agricole CIB may be held responsible. Immediately inform your manager and the Compliance manager.

I MUST

- If I am a manager, make sure that my staff are aware of the rules regarding gifts and invitations, business development activities and business trips;
- Before accepting a gift or an invitation, ask myself how this could be perceived publicly and refuse offers that might create a conflict of interests for myself;
- Be transparent with my manager to avoid any suspicion;
- Refuse invitations to costly events;
- If I accept an invitation, pay the associated travel and accommodation expenses;
- Ask the Compliance department in case of doubt or the anti-fraud and corruption unit (EPPF@ca-cib.com).

I MUST NOT

- Accept or give any gifts or benefits worth more than the authorized 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.

18. 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 prohibited.

For more information on lobbying and financing political parties, you can refer to Crédit Agricole CIB's Anti-Corruption Code of Conduct.

CREDIT AGRICOLE CIB'S COMMITMENT

In cooperation with the relevant trade associations and the experts and practitioners of the various Crédit Agricole CIB entities and/or the Crédit Agricole Group, lobbying enables Crédit Agricole CIB to contribute positively to the development of the regulations that apply to its activities. Its purpose is to provide a reasoned and professional perspective in order to improve legislative and regulatory decisions pertaining to its areas of activity. Crédit Agricole CIB complies with the commitments of Crédit Agricole Group's Responsible Lobbying Charter.

In addition to fully respecting the ban on financing political parties, even in countries where this practice is permitted, Crédit Agricole CIB complies with the commitments of the Crédit Agricole Group by insisting that its political convictions and commitments of its employees remain personal so as never to implicate or jeopardize the reputation of the Group. These activities must be carried out outside working hours and outside the Group.

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 CIB make such a contribution?

No. Even if this form of financial support is accepted by law and local custom, it could expose Crédit Agricole CIB. Immediately inform your manager and the Compliance manager.

I MUST

- Be transparent about my lobbying activities both inside and outside Crédit Agricole CIB ;
- Declare the offices I hold in various trade associations;
- Base my arguments on reliable information that has been analyzed and audited at the internal level;
- Highlight the consequences for the different stakeholders;
- Record all organizations on behalf of which I lobby in the register of representatives of interests, if one exists;
- Update the list of appointments I make with public decision-makers, for the purposes of influencing public decisions, so that I can draft the annual report of my activities, as required by law;
- Declare my elected public offices to my manager and Compliance manager;
- Make sure that my political opinions and actions do not commit Crédit Agricole CIB to anything;
- Refuse any request in any form whatsoever that requests my political support and could make Crédit Agricole CIB liable.

I MUST NOT

- Use corrupt practices and any dishonest or abusive practices;
- Use Crédit Agricole CIB's resources or funds to engage it in fund-raising or political support activities;
- Offer or accept any gifts and benefits.

19. PATRONAGE AND CHARITABLE ACTIONS

DEFINITION

Patronage is the material support provided to a work or a person for the exercise of activities of general interest (decree of January 6, 1989 on economic and financial terminology) without direct counterpart from the beneficiary.

It may take the form of financial, human or material support provided without direct consideration by a company.

Patronage benefits from tax deductions, unlike sponsorship which is considered an advertising investment.

CREDIT AGRICOLE CIB'S COMMITMENT

Crédit Agricole CIB supports charitable actions that contribute to the well-being of society.

This contribution must comply with Crédit Agricole Group's Code of Ethics. More specifically, the Crédit Agricole CIB prioritizes contributions made in countries where it operates and in areas that preserve heritage, solidarity, education, arts, culture and health, etc.

Crédit Agricole CIB may also provide financial contributions, in kind or in case of emergency situations (natural disasters, etc.).

Charitable contributions should never be used to disguise an illegitimate benefit that is intended, or appears to be intended, to influence decision-making.

EXAMPLES

A client contacts me about the possibility of Crédit Agricole CIB participating in the financing of a charity association which he is familiar with.

What should I do in such a situation?

You must contact your manager and/or your Communications department immediately to assess this situation and determine the process to follow.

20. SPONSORING

DEFINITION

Sponsorship is a commercial operation where the company expects a direct commercial profit, and is proportionate to the support it provides to the project. This distinction from patronage is important in practice because the sponsor does not enjoy the same tax advantages as the patron. In other words, patronage is a gift, while sponsorship is a purchase of an advertising service.

This support activity is carried out through the granting of counterparties such as the promotion of the products and services of the sponsoring company, as well as its reputation and brand image.

The advertiser-sponsor seeks potential visibility in relation to the event as well as positive image transfers depending on the type of event being sponsored and the values associated with it. It can also use its sponsoring activities at an internal level to motivate and engage employees.

CREDIT AGRICOLE CIB'S COMMITMENT

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 unduly advantage, improperly influence or give the appearance of improperly influencing any person in charge of making decisions.

EXAMPLES

An operation seems worthy of being sponsored, who should I contact?

First of all, contact the Communications department. Do not commit any funding that could damage the reputation of the Company. The allocation of funds must be transparent and done in coordination with the Communications department.

I MUST



- Contact the Communications department to obtain the list of charities authorized by the Group and select one carefully on the basis of its experience, references and reputation;
- Prefer charitable organizations whose accounts are published and regularly audited;
- With the Communication department, ensure that any expenditure related to a charity is authorized, accounted for and documented (sponsorship agreement, etc.).

I MUST NOT



- Make donations to individuals or for-profit organizations;
- Fund works whose purpose and actions are unclear and cannot be verified;
- Support organizations that could have a negative impact on the Company's reputation, its image or the Crédit Agricole Group's;
- Make cash payments.

I MUST



- Select organizations, institutions or disciplines that are in line with Crédit Agricole CIB's objectives and values;
- Prefer organizations whose experience and reputation are established, and whose accounts are published and regularly consulted;
- Draw up a contract including compliance clauses with the sponsored organization;
- Obtain and keep receipts for all expenses incurred and record them in the books in accordance with accounting rules.

I MUST NOT



- Sponsor an organization suggested by a public official;
- Sponsor an organization that indirectly benefits, or is controlled by, politicians, public officials or their relatives;
- Sponsor an organization related to projects in which Crédit Agricole CIB and/or the Crédit Agricole Group are involved for commercial purposes.



Our rules of conduct regarding protection and reputation of the Group



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21. CONFIDENTIALITY

DEFINITION

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

DETAILS

All information related to customers, as well as to Crédit Agricole CIB, the other entities of the Crédit Agricole Group (their employees, their customers, and their internal organization), information systems, security procedures, suppliers and 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 the subject of a criminal, administrative or professional sanction.

CREDIT AGRICOLE CIB'S COMMITMENT

Confidentiality must be respected in all circumstances and applies to all types of media. All 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 authorized to do so or in the cases provided for by law.

Within the entity itself, a system known as an "information barrier" is put in place to prevent conflicts of interest and to avoid the undue circulation or improper use of sensitive information, in particular information that could be classified as confidential or privileged information.

Employees must also apply the principle of confidentiality with the utmost rigor when they are outside the entity. This concerns the use of social media but also conversations in the private (family, friends, etc.) or public sphere (public transport, restaurants, public places in general). They are responsible for their Internet publications and must ensure that they do not disseminate information on the Internet that they would not otherwise provide outside the Crédit Agricole CIB. This principle of confidentiality also applies to professional social networks.

EXAMPLES

I am travelling on public transport and want to take advantage of the journey to get ahead in my work, can I do it?

The screen of a laptop computer, without a privacy filter, is easily readable by other passengers. Do not work on confidential documents under these conditions. The same applies to tablets and mobile phones.

I have to write the minutes of the Strategic Committee and a colleague offers to help me with the layout. Can I forward it to him by e-mail?

You must guarantee the confidentiality of this document and limit its circulation. If your colleague did not attend the meeting, you cannot give him or her this task.

I am on public transport and I receive a call from my customer who wants clarification on a current case and his questions require answers with elements of confidentiality.

In this case, you should explain that you are in a public place and that you will contact him as soon as you are in a private place.

22. PREVENTION OF MONEY LAUNDERING AND FINANCING OF TERRORISM

DEFINITION

Money laundering and terrorist financing are offenses that affect our societies in general and the economic development of countries. Through this, criminals can infiltrate financial institutions, control certain economic sectors and corrupt governments and management, harm people's lives, threaten democracy and limit development.

DETAILS

Money laundering aims to conceal the source of money acquired illegally, such as drug trafficking, corruption, tax evasion, etc. and thus to make it appear legal.

Terrorist financing is a very broad offense which covers the financing of terrorist acts but also the financing of terrorist organizations and terrorist individuals, even if there is no link with one or more specific terrorist acts.

CREDIT AGRICOLE CIB'S COMMITMENT

Crédit Agricole CIB participates in the fight against money laundering and the financing of terrorism.

Any breach of our obligations exposes directors, managers, and employees to civil, criminal, administrative and disciplinary sanctions. In addition, Crédit Agricole CIB's image and reputation are at stake.

Money laundering and terrorist financing are often based on complex financial arrangements, the identification of which requires a high degree of vigilance and good coordination between the actors holding the information.

EXAMPLES

Is my client's identification enough to enter into a business relationship?

No, each Crédit Agricole CIB entity must identify the customer, but also the ultimate beneficial owner(s) of its customers as well as other related parties such as shareholders and the customer's legal representatives. The identity of the client and its related parties must be verified.

I note that a client may be active in sectors considered risky, what additional due diligence measures should I apply?

Whenever a client or its beneficial owner is identified as maybe having an activity in a sector considered risky, enhanced due diligence to gather additional information on the client/ultimate beneficial owner must be carried out and the agreement of Compliance must be obtained if the information provided confirms the risk.

I MUST



- Respect the strict confidentiality of the information to which I have access concerning Crédit Agricole CIB's customers and more generally belonging to the Crédit Agricole Group;
- Always obtain the express written authorization of customers when I need to transmit a piece of confidential information that concerns them, except in cases expressly provided for by local provisions;
- Only share confidential information within Crédit Agricole CIB or the Crédit Agricole Group, with the persons concerned and solely for the purposes of their duties;
- Always make sure that a confidentiality agreement exists before sharing confidential information with an external business contact;
- Protect confidential information against unauthorized use and access.

I MUST NOT



- Disclose any information about Crédit Agricole CIB's customers or about Crédit Agricole CIB or the Crédit Agricole Group to outside persons, except in cases expressly provided for by local provisions;
- Send any confidential information in personal emails;
- Disseminate on the social or other media, any information that could harm customers, my entity, my function or Crédit Agricole CIB;
- In public places and in moments of private life, I cannot mention sensitive information or confidential information relating to business transaction.

I MUST



- Make sure I am kept informed about these topics even if I am not directly exposed and complete my training;
- If I am a manager, do my utmost to ensure that my employees are well informed about these topics;
- Actively implement anti-money laundering and anti-terrorist financing procedures;
- Pay particular attention to being aware of my clients when entering into a relationship and throughout the entire process;
- Remain vigilant to identify atypical, suspicious transactions;
- Ask customers to provide explanations to understand and explain their transactions. If not, refuse the completion of the transaction;
- Report any suspicious transactions to the Financial Security department of the Compliance department.

I MUST NOT



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



23. PREVENTION OF TAX EVASION

DEFINITION

Tax evasion consists of illegally voiding to pay taxes. Tax evasion concerns both companies and individuals.

Tax evasion can take various forms (in particular, failure to declare or declaring lower levels of income and/or results) and involve sophisticated financial engineering (notably cross-border).

DETAILS

The FATCA (Foreign Account Tax Compliance Act) and AEOI (Automatic Exchange of Information) regulations, two tax regimes which Crédit Agricole CIB must comply with, afford various tax authorities access to information and enable the fight against tax evasion and tax fraud:

- 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. This is the systematic and periodic disclosure of information on the income of taxpayers (individuals and entities) by the country of the source of income to their country of residence.

CREDIT AGRICOLE CIB'S COMMITMENT

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

Crédit Agricole CIB treats all tax issues with integrity and transparency. All operations and transactions carried out must have a sound economic basis and Crédit Agricole CIB does not seek to avoid paying tax through structures.

Crédit Agricole CIB 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 categorized by the EU as “non-cooperative” (tax havens) or which do not take part in the Automatic Exchange of Information.

EXAMPLES

I have French-American citizenship and live outside the United States. I don't think I should be considered a US citizen.

Because you have dual citizenship you are considered a “US 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.

24. 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 (embargo measures). They are an instrument of foreign policy and have as one of their objectives the fight against terrorism, nuclear proliferation activities and human rights violations.

DETAILS

The international sanctions applicable at the level of Crédit Agricole CIB are issued, administered or enforced by the UN Security Council, the European Union, as well as by competent local authorities.

CREDIT AGRICOLE CIB'S COMMITMENT

Crédit Agricole CIB strives to ensure strict compliance with international sanctions, which can be complex and of extraterritorial scope in countries and territories where Crédit Agricole CIB's activities are carried out. Compliance with these requirements is ensured by rigorous internal procedures and compliance programs with international sanctions, applicable to all Crédit Agricole CIB employees, regardless of the country and regardless of the size of the entity. Crédit Agricole CIB does not tolerate violations of international sanctions.

EXAMPLES

I have dual Franco-American nationality and I am an employee of Crédit Agricole CIB. Which regulations should I refer to?

You are considered a “U.S. Person” affiliated to Crédit Agricole CIB. 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.

I MUST



- Respect, in a totally transparent way, the laws and regulations in force in the states and countries where we carry out our activities;
- Request permission from the Compliance department before any investment by an entity in a non-cooperative foreign state or country;
- Remain alert, identify any action aimed directly or indirectly at circumventing tax rules and report this immediately to the Compliance manager;
- Compile a customer knowledge file for all your clientele that includes information on their tax residence (AEOI) and citizenship criteria (FATCA) and ensure it is kept up to date;
- If in doubt, contact your Compliance manager.

I MUST NOT



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

I MUST



- Become well acquainted with, understand and comply with Crédit Agricole CIB's internal policies and procedures;
- Complete the annual training sessions which are mandatory for all employees, as well as additional training courses eligible for certain population;
- Remain attentive to identify and promptly report to the Sanctions manager of Crédit Agricole CIB any violation or attempted violation of international sanctions as well as any action directly or indirectly, taken 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 the Financial Security department of the Compliance department or my Local Compliance Officer (LCO).

I MUST NOT



- 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.



25. 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 organization.

Where laws, regulations or internal rules are breached, fraud is characterized by the violation 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 characterized by a malicious act carried out by an employee with the complicity of individuals outside the Company. This is referred to as mixed fraud.

CREDIT AGRICOLE CIB'S COMMITMENT

Crédit Agricole CIB places great importance on the prevention of fraud, which uses a growing number of techniques that are 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 preventing fraud. With the daily vigilance of everyone in the Company, we can prevent and detect attempts at fraud.

EXAMPLES

I have just received an email from an unknown address asking me to carry out a transaction on behalf of a director of my entity, what should I do?

Since this situation is abnormal and could constitute "fraud against the President", you must inform your manager, and forward the email to the IT department for identification of the sender. You should also notify the Compliance department via the eppf@ca-cib.com email address.

26. PREVENTION OF MARKET ABUSE

DEFINITION

The commission or attempted commission of insider trading, price manipulation, manipulation of benchmarks and dissemination of false information constitute market abuse. The fight against market abuse means preserving the integrity and transparency of markets as well as public trust. It is also an obligation imposed on all employees within Crédit Agricole CIB.

In the event of non-compliance with these regulatory and legal obligations, Crédit Agricole CIB and the natural persons placed under its authority are subject to disciplinary, financial, civil and criminal penalties.

DETAILS

Information which (i) is not made public, (ii) is specific, (iii) relates to a listed company or a listed financial instrument and (iv) is likely to influence its price or that of related financial instruments is said to be privileged. It can also be communicated, heard, 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.

Price manipulation involves attempting or influencing the price of an instrument through the use of fraudulent mechanisms that undermine market integrity, such as (non-exhaustive list):

- dissemination of false information;
- manipulation of benchmarks;
- the placing of orders that are not intended to be executed, or that would give a positive/negative signal on the supply or demand of a given instrument.

CREDIT AGRICOLE CIB'S COMMITMENT

Crédit Agricole CIB implements "information barriers" to control the circulation of confidential and/or privileged information. Inside information is also covered by a specific mechanism.

Barriers also ensure that exchanges between people having access and those without access are watertight, in particular through the physical separation of people carrying out sensitive activities or functions.

Regular training sessions are organized for employees to raise awareness of good and unaccepted practices and the risks involved in attempts to abuse the market. Crédit Agricole CIB is setting up a system to monitor transactions that could harm market integrity.

EXAMPLES

During my morning coffee break, I understand from a conversation that a listed company is planning to buy another listed company. This information has not yet been made public. Can I make a financial transaction on the securities of these companies?

No. The applicable regulations considers as "insider" any person holding inside information obtained in the course of his or her duties, profession or by any other means. The holding of such information imposes certain obligations on the data subject to abstain. In addition, this employee is expected to contact the Conflict Management Team in order to be registered in an insider register.

A friend asks me to advise him/her on the management of his/her investments as part of his/her Equity Savings Plan. Can I advise him/her to buy or sell the security that for which I am an insider?

No, as an insider on this security you are bound by an obligation to abstain. You are strictly prohibited from communicating, distributing or using any insider information in your possession, whether on your own behalf or on behalf of a third party.

I MUST



- Be well acquainted with the law and best practices concerning fraud prevention, and responsibly apply them and with constant vigilance;
- In the event of suspicion of fraud, doubt or proven fraud, immediately alert my manager and the fraud prevention unit of the Compliance department via the address eppf@ca-cib.com or, when the conditions are met, by activating my "right of alert";
- If in doubt about the sender's identity of an email, forward it to my IT correspondent via the address abusephishing@ca-cib.com;
- If I am a manager, evaluate the risk of fraud attached to my 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.

I MUST NOT



- Take advantage of information that would allow me to carry out a fraudulent act to my advantage or to that of a third party;
- Transmit information to a third party that would allow him to carry out a fraudulent act;
- Reply to an email from an unknown sender asking me to carry out an unusual transaction or to bring to his attention information;
- Communicate my passwords to anyone or lend my access badge;
- Leave confidential information or documents on my desk or where they can be seen by other employees (meeting rooms, photocopiers, etc.);
- Discuss sensitive issues that could involve Crédit Agricole CIB in public;
- Use external media (external hard drives or USB sticks) without taking precautions.

I MUST



- 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, you must tell your manager who will inform the Compliance manager;
- If you have confidential information, strictly follow the "need to know" principle. Any incident should be immediately escalated to CMG and GMRC surveillance;
- Do not initiate or spread a rumor;
- Report any suspicious transaction of market abuse without delay to the Compliance department, which, after analysis, decides whether or not it is appropriate to report it to the competent local authority(ies);
- Preserve the confidential nature of any suspicious transaction declaration and, as such, do not communicate with those suspected of having committed market abuse, proven or otherwise.

I MUST NOT



- Use insider information when acquiring or transferring financial instruments, contracts, or securities to which this information relates, whether for your own account, or on behalf of Crédit Agricole CIB or that of a third party;
- Communicate insider information to a third party outside the normal scope of your function, to persons outside Crédit Agricole CIB or to employees who are not authorized to access such information;
- Disseminate confidential information outside the "need to know";
- Manipulate or attempt to manipulate reference prices/indices by maneuvers designed to interfere with the free establishment of the price, mislead the public, or intend to secure a dominant position on the market;
- Disseminate false or misleading information;
- Recommend taking positions on a security based on insider information to any third party (employee of Crédit Agricole CIB or another Crédit Agricole Group entity, or an external third party, etc.).



27. 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 CIB employees at both 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.

CREDIT AGRICOLE CIB'S COMMITMENT

Crédit Agricole CIB is present on many of these social media networks so that it can communicate with its customers stakeholders, while taking note of any comments made.

Except where abuse is involved, all Crédit Agricole CIB 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.

EXAMPLES

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

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

As part of a new project, a colleague suggested I create a group on LinkedIn so that we could exchange information between ourselves and share documents.

Refuse: Crédit Agricole CIB does not permit its employees to exercise their business activity on the social networks, unless in very exceptional cases. Discuss the project with the Communications department.

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

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.



I MUST



- Respect the rules of confidentiality and 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 Crédit Agricole CIB and Crédit Agricole Group 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



- Carry out your business activity on the social media without having obtained authorization from the Communications department;
- Express yourself officially on behalf of Crédit Agricole CIB if you are not a spokesperson appointed by the Communication department;
- Make any remarks that could harm your position or Crédit Agricole CIB 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;
- Enter into any form of communication that supports a political, societal or religious commitment, by associating your professional activity within Crédit Agricole CIB;
- Use information that is protected by Crédit Agricole CIB copyright without having obtained prior written consent from the relevant department or, failing that, from the Communications department.



