

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is published pursuant to section 54 of the UK's Modern Slavery Act 2015 (designed to combat modern slavery and human trafficking).

It describes the measures taken by the CACEIS group, and in particular by its subsidiary CACEIS Bank, during the financial year ended 31 December 2025, to combat all forms of modern slavery and human trafficking in our business and in our relations with suppliers.

The statement has been approved by the Board of Directors of CACEIS Bank, which operates in the United Kingdom through CACEIS Bank UK Branch. The CACEIS group also owns a subsidiary in the UK, CACEIS UK Trustee and Depositary Services Ltd, dedicated to depositary activities.

### OUR GROUP, OUR BUSINESS ACTIVITIES AND OUR SUPPLY CHAIN

CACEIS is an international banking group and a leading player in the European asset servicing market. It is 100%% owned by Crédit Agricole S.A..

It provides a comprehensive range of products and services to a client base made up of asset management companies, insurance companies, pension funds, private equity, real estate, infrastructure and private debt funds, private banks, brokers and corporates.

It covers the whole service chain from order execution to account holding and custody of its clients' financial assets, throughout the entire life cycle of investment products and across all asset classes: execution, clearing, forex, securities lending, custody, depositary services, fund administration, middle-office outsourcing, fund distribution, and issuer services.

With 7,000 staff members in 17 countries, CACEIS operates in Europe, North America, South America and Asia.

CACEIS had €5,900 billion of assets under custody and €3,700 billion of assets under administration at 31 December 2025, making it a European leader in asset servicing and one of the largest players worldwide and is a consolidator in the European market..

CACEIS generates solid financial results and steady growth in terms of assets, clients and geographical coverage.

In carrying out its activities, CACEIS may use suppliers that may themselves subcontract. In 2025, the main purchasing and service contracts concerned the following areas: IT, intellectual services and general purchasing.

### OUR COMMITMENTS

The measures we take are in line with the fundamental principles to which we adhere and with the applicable international texts, particularly in terms of upholding human rights, combating modern slavery,

#### CACEIS Bank

Public limited company (*société anonyme*) with share capital of €1,280,677,691.03  
Registered with the Nanterre trade and companies register under number 692 024 722 - APE business activity code 64 19Z - VAT number: FR 56692024722  
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safeguarding the health and safety of individuals, protecting the environment and developing sustainable finance.

We are also driven by our shareholder's Raison d'Être of "acting every day in the interests of our clients and society". As a result, environmental, social and societal and governance issues are at the heart of the group's three main projects, which guide our actions: the Customer Project, the Human-centric Project and the Societal Project ([Discover the Crédit Agricole Group | Crédit Agricole](#)).

In addition to the applicable regulatory framework, the CACEIS group has chosen to promote a strong culture of compliance and ethics. We pay particular attention to the impact that our activities have on people and the environment, in order to achieve the objectives expressed in our policies in terms of commitment to clients, employees, partners and society.

Within the CACEIS group, we do not tolerate any form of modern slavery or human trafficking in our supply chain or in the course of our business. We are committed, through our shareholder Crédit Agricole S.A., to combating all forms of modern slavery and human trafficking in our supply chain and we demand the same commitment from our suppliers.

Our Group's main commitments are, but are not limited to, the fundamental principles expressed in the following texts:

- The **Human Rights Charter** adopted by the Crédit Agricole group in December 2009, which confirms that all Crédit Agricole . group entities uphold the fundamental principles and rights proclaimed by the Universal Declaration of Human Rights and the Conventions of the International Labour Organization, particularly those relating to forced labour, child labour, discrimination and freedom of association.
- The **United Nations Global Compact**, under which the Crédit Agricole . group undertakes to uphold 10 universally accepted principles relating to human rights, labour standards, the environment and the fight against corruption.
- The **Crédit Agricole group's Code of Ethics**, which states that the Group's principles of action and conduct must be upheld on a day-to-day basis. Those principles comply with applicable international texts on human rights, efforts to combat forced and child labour, and the fight against corruption.
- The **International Framework Agreement on Fundamental Human and Trade Union Rights** signed by Crédit Agricole S.A. and UNI Global Union, the international trade union federation for the private services sector in July 2019 and renewed in October 2023.
- The **2023 Responsible Purchasing Policy** and **2023 Responsible Purchasing Charter**, which apply to all staff members, participants in the purchasing process and suppliers to the Crédit Agricole group, including CACEIS. The Responsible Purchasing Policy is fully aligned with the Group's Ethics Charter and Societal Project. One of its six principles consists of responsible conduct in relation to suppliers: that responsible conduct is based on the fundamental principles of the United Nations Global Compact, to which all signatories have made a commitment, in the fields of human rights, working conditions, the environment and the fight against corruption.

All these documents are available on the website of our shareholder, the Crédit Agricole S.A. group ([News and Publications | Crédit Agricole](#)).

- The **CACEIS group Code of Conduct** is available online at <https://www.caceis.com/who-we-are/corporate-social-responsibility/>. It is consistent with the Ethics Charter and represents the framework for ethical and professional conduct that must be followed by everyone, regardless of their role and level of seniority within the CACEIS group. It has been designed to guide our day-to-day conduct as closely as possible. It presents and illustrates situations that any staff member may face. The Code of Conduct reflects the requirement to act responsibly and ensure a high level of quality in all our professional actions, our commitment to conduct our business in accordance with ethical standards and our willingness to always provide the best possible service to our customers and all our stakeholders. In 2020, a programme was implemented to help instil the Group's ethical culture in all CACEIS staff members and to measure their level of understanding in this area.
- The **CACEIS group Anti-Corruption Code of Conduct**, included in the Code of Conduct, covers our obligations to prevent corruption in accordance with France's Sapin II act. The system set up within CACEIS to combat corruption and influence peddling is ISO 37001-certified.
- As regards **whistleblowing**, in order to enhance risk prevention, any employee of the CACEIS group, as well as any person subject to the relevant laws, may raise an alert relating to a crime, offence, threat or harm to the public interest, human rights or fundamental freedoms, or a breach of an international commitment ratified by France in particular, using the Crédit Agricole group S.A. whistleblowing platform: <https://www.bkms-system.com/bkwebanon/report/clientInfo?cin=3CAgr18&c=-1&language=eng>. Whistleblowers are protected if they report or disclose information in good faith and without direct financial compensation. The BKMS whistleblowing platform can be accessed 24/7 from a personal or work computer connected to the internet via a unique link. It guarantees the confidentiality of the whistleblower, the incidents reported and the people concerned. The information is encrypted and stored in a separate secure environment. By reporting matters in good faith, whistleblowers protect themselves, their colleagues, clients and CACEIS.

Procedures already in place or currently being introduced within CACEIS include but are not limited to the following:

### **1. With regard to our employees**

We ensure that all our internal procedures comply with the commitments made at the Crédit Agricole S.A. group level.

On 9 October 2023, as part of the reinforced social pact included in the Group's Human-centric Project, Crédit Agricole S.A. signed a new International Agreement with UNI Global Union, the international trade union federation for the private services sector.

This global agreement covers union rights, human rights, fundamental labour rights, the continuous development of social dialogue and collective bargaining. It provides a reference framework for all Crédit Agricole group employees in the 46 countries it operates in. It reinforces CACEIS' commitments by offering the same social framework to all its employees, regardless of their place of work and by helping to improve working conditions. In order to guarantee that human rights are upheld for all its employees, all CACEIS' internal HR procedures are consistent with the commitments and policies outlined in the present statement.

In particular, CACEIS ensures that its sites offer a working environment that safeguards the health of its employees, that it plays an active role in providing welfare benefits to all its employees (particularly in matters relating to health, retirement, death, incapacity and disability) and that it takes care to preserve the safety and security of its employees.

In a context of increased digitalisation in the financial sector and new work arrangements, the Group has also formalised principles regarding remote working and strengthened its cybersecurity guidelines.

As a signatory of the Diversity Charter, we affirm, through our shareholder, our commitment to all diversity, and signal our determination to combat discrimination. CACEIS frequently conducts training and awareness-raising programmes, and annual indicators are produced to track the results of the measures it takes.

In June 2025, CACEIS also implemented group-level guidelines on sexual and psychological harassment

The Global Agreement of 9 October 2023 prohibits any form of discrimination, violence, and harassment, and reiterates Crédit Agricole S.A.'s commitments to its employees in favour of diversity and inclusion, as well as equal opportunities and training.

Finally, CACEIS has a proactive policy of employing and integrating disabled people, formalised since 2005 through its three-year disability agreements. The latest agreement signed at Crédit Agricole Group level covers the period 2026-2028.

## **2. With regard to our suppliers**

As regards risks related to our supply chain, we seek to identify and mitigate the risk of modern slavery and human trafficking by applying a risk-based approach, the Crédit Agricole group's Responsible Purchasing Policy that we signed in 2023, as well as procedures that have been put in place to:

- Identify and assess the areas most at risk in our supply chain;
- Ensure that the suppliers and subcontractors with which we have established relationships accept commitments relating to the vigilance plan put in place by Crédit Agricole S.A.

All CACEIS standard supplier contracts include a specific clause relating to "Respect for human rights, protection of the environment and the fight against corruption". Through this clause, suppliers represent and warrant that they will comply and ensure compliance within their supply chains with all the obligations incumbent upon them in terms of identifying risks and preventing serious violations resulting from their activities in terms of human rights and fundamental freedoms, the health and safety of people and the environment, under laws and/or regulations relating to respect for human, social and environmental rights.

We therefore ask our suppliers to make a commitment to uphold human rights and to comply with all applicable labour laws and social and environmental standards.

These elements are included in the CACEIS group's Purchasing Process Charter, which applies to all employees. CACEIS also offers a responsible purchasing and a duty of vigilance e-learning modules, which cover the identification of practical risks related to modern slavery and human trafficking in our supply chain and are freely accessible to all staff members.

In addition, criteria relating to upholding human rights and protecting the environment are now systematically assessed in every call for tenders from suppliers listed by the Crédit Agricole group. The assessment covers both the supplier's CSR policy and the CSR criteria used to evaluate the tender.

The CSR quality of the supplier's product or service is assessed by including, within the tender specifications, technical and other specific criteria determined on the basis of risk mapping. The resulting CSR score partly determines whether the supplier is awarded a contract for the product or service. Since 1 January 2020, a supplier's CSR score has accounted for a minimum of 15% of its overall score.

The Crédit Agricole group's purchasing department has also adopted a more comprehensive process for assessing supplier risk and compliance. The KYS (Know Your Supplier) system is described in a procedural memo applicable to the whole Crédit Agricole group, including the CACEIS group.

## CONTINUOUS IMPROVEMENT

Mechanisms to prevent the risk of human rights and environmental abuses incorporate obligations arising under international rules and recommendations as well as obligations arising under national law. As a result, efforts to prevent these risks are consistent with the measures adopted under the French act of 9 December 2016 on transparency, the fight against corruption and the modernisation of the economy, known as the Sapin II act, and with the Vigilance Plan introduced by the Credit Agricole S.A. group and established under the French act of 27 March 2017 on the duty of vigilance for parent and instructing companies.

The management of these risks is part of a process of continuous improvement that focuses mainly on the following areas:

- Adapting tools for identifying and controlling non-financial risks by updating risk maps where necessary;
- Continuing the deployment of targeted action plans to reduce the CSR risks of suppliers in the purchasing categories identified as high and very high risk;
- Seeking to involve suppliers in our approach by regularly discussing our commitments and our responsible purchasing strategy with them;
- Deploying our main shareholder's whistleblowing tool for our suppliers;
- Defining a programme to raise staff members' awareness of the duty of vigilance;
- Implementing the Responsible Purchasing policy in our recently integrated entities.

Date: 14 April 2025.



Jean-Pierre Michalowski  
Chief Executive Officer of CACEIS Bank

