

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

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

This statement describes the measures taken by the CACEIS Group, and in particular by its subsidiary CACEIS Bank, during the financial year ended 31 December 2019, to combat all forms of modern slavery and human trafficking in the course of its activities and in its relations with its suppliers.

This statement has been approved by the Board of Directors of CACEIS Bank, which operates in the United Kingdom primarily through its branch, CACEIS Bank, UK Branch.

OUR GROUP, OUR BUSINESS ACTIVITIES, AND OUR SUPPLY CHAIN

CACEIS is an international banking group offering a full range of post-trade services across all asset classes. With more than 4,500 employees in France and 14 other countries, CACEIS develops execution, clearing, custody, custodian bank and fund administration solutions for institutional clients, asset management companies, banks, brokers and corporations.

CACEIS is the European leader in custodian banking and fund administration services and a player present in the North American and Asian markets. CACEIS posts strong financial results and benefits from the support of Crédit Agricole S.A., its long-term shareholder, and the backing of the Banco Santander Group, the leader in the Spanish market, which became a shareholder of CACEIS at the end of 2019 by contributing to CACEIS its asset servicing and institutional custody activities in Spain and Latin America (Brazil, Mexico and Colombia). The merger between CACEIS and Santander Securities Services (S3) (now CACEIS Bank Spain) consolidates the CACEIS Group's position as a key global player in the custody and asset servicing markets serving international institutional clients.

In addition, in 2019, the CACEIS Group's acquisition of KAS Bank also strengthens its presence in the Netherlands, Germany and the United Kingdom and its range of services for pension funds, insurance companies and asset management companies.

The CACEIS Group is a long-term strategic partner for its many clients.

In carrying out its activities, the Group may use suppliers who may themselves use subcontractors.

Thus, in 2019, the main purchasing and service contracts mainly concerned the following areas: real estate, IT, intellectual services, general purchasing and communication.

CACEIS Bank

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OUR COMMITMENTS

Our measures are in line with the fundamental principles to which we adhere and the applicable international texts, particularly in terms of respect for human rights, the fight against modern slavery, and the prevention of attacks on the health and safety of individuals. Beyond the applicable regulatory framework, our Group has chosen to promote a strong culture of compliance and ethics. Particular attention is paid to the impact of our activities on people and the environment in order to achieve the objectives expressed in our policies of commitment to clients, employees, partners and society.

Within the CACEIS Group and CACEIS Bank, we do not tolerate any form of modern slavery or human trafficking in our supply chain or in the course of our activities. We are committed, through our majority shareholder Crédit Agricole S.A., to combating all forms of modern slavery and human trafficking in our supply chain and we demand the same commitments 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 S.A. Group, which confirms that all Crédit Agricole S.A. Group entities, including the CACEIS Group, respect the fundamental principles and rights proclaimed by the Universal Declaration of Human Rights and the Conventions of the International Labour Organization, which cover, in particular, issues related to forced labour, child labour, discrimination and freedom of association.
- The **United Nations Global Compact** ("Global Compact"), under which the Crédit Agricole S.A. Group, including the CACEIS Group, undertakes to respect ten (10) universally accepted principles relating to human rights, labour standards, the environment and the fight against corruption.
- The **Crédit Agricole S.A. Group's Corporate Social Responsibility ("CSR") Strategy**, whose environmental and social guidelines cover aspects relating to respect for human rights.
- The **Crédit Agricole S.A. Group's Code of Ethics**, which states that the Group's principles of action and conduct comply with applicable international texts on human rights, the fight against forced and child labour, and the fight against corruption.
- The **International Framework Agreement on Fundamental Human and Trade Union Rights** signed between Crédit Agricole S.A. and UNI Global Union, the international trade union federation for the private services sector, in July 2019.
- The **CACEIS Group's Responsible Purchasing Charter** revised in 2019 and the **Crédit Agricole Group's Responsible Purchasing Policy** extended in 2018 to all Group entities, which are based on reciprocal commitments between the Crédit Agricole Group and its suppliers based on the fundamental principles of the United Nations Global Compact.

All these documents are available on the website of our shareholder, the Crédit Agricole S.A. Group.: : <https://www.credit-agricole.com/en/responsible-and-committed/our-csr-strategy-partnering-a-sustainable-economy>

- The **CACEIS Code of Conduct** published in January 2019 is available on the website <https://caceis.cld.bz/CODE-DE-CONDUITE>, drawn up in accordance with the Code of Ethics, and represents the framework for the ethical and professional conduct expected of all employees, regardless of their position and function within the CACEIS Group. It has been designed to be as close as possible to our daily behaviour. It presents and illustrates the situations anyone may face. This Code of Conduct reflects our demand for responsibility and quality in all our professional actions, and our desire to always serve our clients and all our stakeholders to the best of our ability.

The procedures within the CACEIS Group, currently in place or in progress, include, but are not limited to, the following:

- **With regard to our employees**

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

As part of the reinforced social pact included in the Group's Human Project, on 31 July 2019 Crédit Agricole S.A. signed an International Framework Agreement with UNI Global Union, the international trade union federation for the private services sector. This global agreement covers human rights, fundamental labour rights and the development of social dialogue and provides a reference framework for all Crédit Agricole S.A. Group employees. 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 respect for the human rights of all its employees, all CACEIS' internal HR procedures are in line with the commitments and policies outlined in this statement.

In particular, the CACEIS Group ensures that its sites offer a working environment that preserves the health of its employees, that it is actively involved in the social protection of 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.

As a signatory of the Diversity Charter, we affirm, through our shareholder, our commitment to cultural, ethnic and social diversity, and signal our determination to combat discrimination.

In addition, a body of Group procedures has been put in place, including in particular a whistleblower procedure.

- **With regard to our suppliers**

With regard to risks related to our supply chain, in order to identify and mitigate the risks of modern slavery practices and human trafficking, we apply a risk-based approach and apply the Crédit Agricole S.A. Group's "Responsible Purchasing" policy that we signed in 2018 and the procedures that have been put in place to:

- Identify and assess the areas most at risk in our supply chain;
- Monitor high-risk areas in our supply chain;

- Mitigate the risk of modern slavery and human trafficking in our supply chain.

The adherence of our suppliers to our values is achieved through the commitments requested from our suppliers, especially during calls for tenders in excess of 50,000 euros, and by requesting the signature of our standard Sustainable Development Appendix (Responsible Purchasing Charter) included in our standard contract models. It formalises the reciprocal commitments between CACEIS Group entities and its suppliers, based on the fundamental principles of the United Nations Global Compact.

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

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

These elements are included in the "CACEIS Group Purchasing Process Charter" which applies to all employees. In addition, a training course on responsible purchasing, updated in 2019, is offered to all employees working in CACEIS Bank's purchasing business line, with a focus on identifying the practical risks associated with modern slavery and human trafficking in our supply chain, in line with the training courses set up by our shareholder.

In 2019, a CACEIS Responsible Purchasing Committee was set up to define, monitor and measure the progress of CACEIS' Responsible Purchasing policy, underlining, notably through its directive published in July 2019, the importance of monitoring supplier risks.

As part of a mapping of intrinsic CSR risks relating to purchasing categories in the banking sector carried out by the Crédit Agricole S.A. Group with three major players in the banking sector and AFNOR, three purchasing categories identified as high or very high risk were deemed to be priorities for initiating an action plan. These are the "works", "IT equipment and servers" and "advertising objects" purchasing categories, for which progress plans were initiated in 2019 with the suppliers and introducers referenced by the Crédit Agricole S.A. Group.

In addition, an assessment of criteria relating to respect for human rights is now systematically included in each call for tenders from suppliers referenced by the Crédit Agricole Group. It covers both the supplier's CSR policy and the CSR criteria used to evaluate the tender. Since 2012, the evaluation of the supplier's CSR policy has been entrusted to an independent and specialised third party, EcoVadis. The CSR quality of the supplier's tender (product or service) is assessed by including in the specifications technical and specific criteria determined on the basis of risk mapping. In addition, it was decided to increase the percentage assigned to CSR criteria in the supplier's overall score from 10% to 15% as of 1 January 2020, to reinforce the discriminating nature of these criteria in the awarding of the contract to the supplier.

In order to strengthen risk prevention, a Crédit Agricole S.A. Group centralised whistleblowing system is open not only to employees of CACEIS Group entities but also to third parties to enable them to report any breaches of Group ethics, policies or procedures. To facilitate reporting in areas such as human rights, health and safety and the environment, such reporting can now be carried out via a digital whistleblowing and alert processing tool accessible via a link on our website, <https://www.credit-agricole.com/en/group/ethique-et-conformite/whistleblowing-system>. Confidentiality regarding the identity of whistle-blowers is the rule in the event of an alert in accordance with the regulations.

This alert processing tool is available in all the languages of our sites (French, English, German, Spanish, Italian, Dutch, Portuguese).

CONTINUOUS IMPROVEMENT

Mechanisms to prevent the risk of human rights abuses incorporate both obligations under international rules and recommendations and obligations under national law. As a result, the prevention of these risks is developed in line with the measures put in place under the French law of 9 December 2016 on transparency, the fight against corruption and the modernisation of the economy, known as the "Sapin 2 Law", and with the Vigilance Plan established under the French law 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 the tools for identifying and controlling non-financial risks by updating, if necessary, the risk maps;
- 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 our suppliers in our approach by regularly discussing our commitments and our responsible purchasing strategy with them.
- Deploying the whistleblowing tool proposed by our main shareholder, for our suppliers.
- Implementing the Responsible Purchasing policy in our newly integrated entities.

Date: 30.07.2020

Jean-François Abadie
CEO, CACEIS Bank

