



Summary of the Policy and Framework for the Protection of BNP Paribas Clients' Interests

BNP Paribas Group places responsibility towards its clients at the heart of its strategy.

The protection of clients' interests (PIC) is a fundamental element of BNP Paribas' corporate culture and a shared responsibility of all Group employees.

The policy for the protection of clients' interests, cornerstone of the PIC framework

In accordance with the commitments of its Code of Conduct, and in line with European and international regulations, BNP Paribas Group has established a policy dedicated to the Protection of Clients' Interests (PIC).

This policy applies to all BNP Paribas entities, regardless of their business activities, types of clients, or distribution channels. The application of this policy may vary depending on the activity and country of each entity.

The PIC policy defines the organizational rules required to prevent risks related to PIC and recalls the conduct rules associated with PIC, reaffirming the standards to be respected in terms of behaviour towards clients.

It also identifies four major risks and lists the frameworks to be implemented to mitigate them:

- Risk of selling a product or service that does not meet the needs and situation of the client.
- Risk of providing misleading or unclear information to the client, preventing them from making an informed decision.
- Risk of not acting in the clients' interest by prioritizing the interests of BNP Paribas Group, its employees, partners, or other clients.
- Risk that clients' complaints are not handled properly.

PIC risks are inherent in processes involving clients, which are fully managed by the various business lines of the Group. The first line of defence plays a crucial role in managing these risks as its owner. The

Compliance function acts as the second line of defence.

PIC rules and frameworks must be respected throughout the client relationship, as well as at each stage of the product and service lifecycle, from their design to after-sales service.

Finally, the Group has implemented control frameworks to ensure that its PIC framework is effectively applied.

Focus on the Client Complaint Management Framework

The handling of complaints is an essential component of the PIC policy and is governed by specific operational procedures. The PIC policy establishes the rules for handling complaints, and each business line or entity within the Group is responsible for their implementation.

The complaint handling process includes five steps:

- Informing clients about the procedure for filing a complaint.
- Receiving the complaint.
- Confirming receipt of the complaint to the client.
- Analysing the complaint to verify its validity and understand its possible causes.
- Addressing the issue identified in the complaint and responding to the client.

To ensure effective complaint management, two steps must adhere to specific deadlines: the confirmation of receipt must be sent to the client within ten working days, and the response must be provided within two months, except in justified special circumstances. These deadlines are maximums and can be shortened depending on the activity performed or local regulations.

Additionally, many entities within the Group offer the services of independent mediators to which clients can turn. For example, in France, Italy, and Belgium, clients have the option to use the mediation services offered according to national setups.



When the complaint handling process reveals a gap, it must be corrected quickly, and its structural causes must be analysed to implement corrective measures.

Furthermore, complaints are subject to regular holistic analyses to identify areas for improvement. To facilitate this identification, an annual report is provided to the management of each entity, as well as to local Compliance teams.

The number of complaints is an indicator monitored by each entity of BNP Paribas, as well as at the Group level.

Operational Pole	Complaints received	Clients
Commercial, Personal Banking & Services	910	65 732
Investment & Protection Services	78	71 200
Corporate & Institutional Banking	1	152

Period: 2024 Number: 000s

The number of complaints is correlated with the number of clients in each division, as well as the nature of their activities. Indeed, interactions with individual clients tend to generate more complaints than those with corporate clients.