

VIGILANCE PLAN

March 2025

Extract from chapter 7 (part 7.2) of BNP Paribas' 2024 Universal Registration Document¹

The publication of this vigilance plan answers to the law No. 2017-399 of 27 March 2017 on the duty of care of parent companies and of companies using subcontractors.

¹ <https://invest.bnpparibas/en/document/universal-registration-document-annual-financial-report-2024-pdf>



7.2 Vigilance plan

FRAMEWORK AND GOVERNANCE

REGULATORY FRAMEWORK

Law No. 2017-399 of 27 March 2017 on the duty of care of parent companies and of companies using subcontractors applies to BNP Paribas and requires a vigilance plan to be established and implemented to identify and prevent the risk of serious violations of human rights and fundamental freedoms, and of harm to human health and safety and to the environment. The law also requires the preparation of an annual report on the effective implementation of the Group's vigilance plan.

BNP Paribas' vigilance plan applies to all subsidiaries controlled by the Group and is published in its Universal registration document. BNP Paribas updates its vigilance plan each year, in particular by drawing on best practices in this area, and reports on its framework for monitoring the measures implemented and assessing their effectiveness in section 5 of this chapter.

ELABORATION OF THE VIGILANCE PLAN

Drafting and approval process

BNP Paribas' vigilance plan is drafted under the lead of the Company Engagement Department, in charge of the CSR strategy, with contributions from:

- the Human Resources Department (HR) with regard to the Group's employees;
- the Technology & Operational Performance (TOP) Department, including the central Procurement & Performance (P&P) team for BNP Paribas' suppliers and subcontractors;
- the main business lines within BNP Paribas' three divisions (Commercial, Personal Banking & Services - CPBS, Investment & Protection Services - IPS, and Corporate & Institutional Banking - CIB) for the distribution of financial products and services to individuals and for financing, investment and business advisory activities;
- the Finance, Compliance, RISK and LEGAL Departments, which contribute to overseeing the Group's environmental, social and governance (ESG) issues.

The Corporate Governance, Ethics, Nominations and CSR Committee (CGEN) reviews BNP Paribas' vigilance plan and issues recommendations to the Group's Board of directors. Among other duties, the CGEN is responsible for monitoring CSR issues and for the integration of the CSR issues into the fulfilment of the Group's missions.

The Group's Board of directors, which has a specific role with regard to CSR, is responsible for approving the BNP Paribas' vigilance plan.

Internal and external contributions to the BNP Paribas' vigilance plan

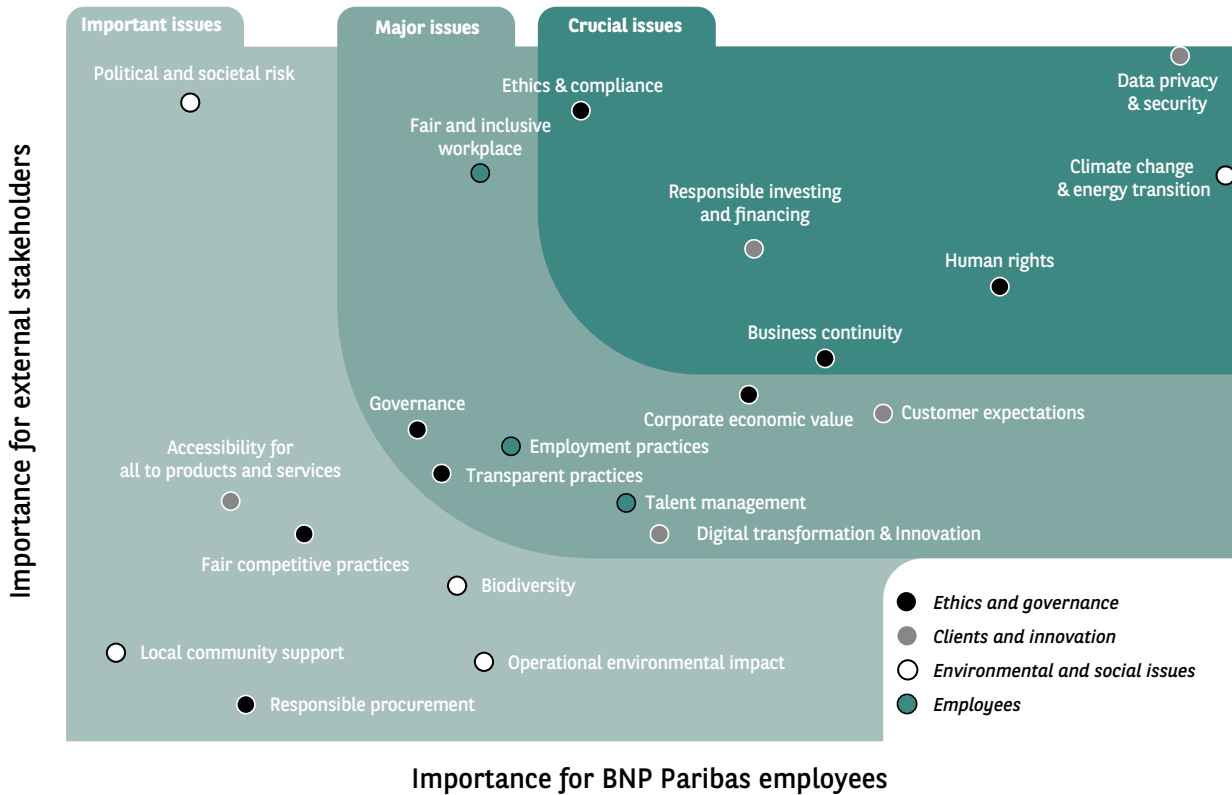
BNP Paribas' vigilance plan is prepared taking into account the Group's business model, the specificities of its activities and geographical locations, as well as the information and requests of its stakeholders. The vigilance plan is therefore updated on an annual basis, fed by these elements and an ongoing dialogue, in particular with its employees and representative bodies, its investors and its customers, as well as with civil society, including NGOs (see section 4.1 *Dialogue with stakeholders*).

BNP Paribas has identified 21 extra-financial issues for the Group and ranked them according to the importance given to each of these issues, on the one hand, by its employees and on the other hand, by its external stakeholders.

Internal perception was collected from more than 1,200 Group employees, while external perception was assessed through the analysis of the publications of BNP Paribas' main peers, more than 2,500 regulations applicable to its activities and regions, more than 20,000 industry press articles and more than 450 million messages posted on X (formerly Twitter).

The chart below distinguishes between three categories of issues: crucial, major and important.

➤ REPRESENTATION OF BNP PARIBAS' EXTRA-FINANCIAL ISSUES ACCORDING TO THEIR IMPORTANCE FOR ITS STAKEHOLDERS



The interests and points of view of certain Group stakeholders are also taken into account through the double materiality exercise required by the Corporate Sustainability Reporting Directive (CSRD) regulation.

CSR STRATEGY & GOVERNANCE

Given its scope and the issues involved, the vigilance plan is part of BNP Paribas' CSR strategy and relies on its dedicated governance.

Purpose and Strategic Plan

Contributing to a more sustainable and responsible economy is at the heart of BNP Paribas' purpose. The Group's ambition is to contribute to the transition of the entire economy to a more responsible and sustainable model, meeting the needs of the population without damaging ecosystems, in line with the 17 United Nations Sustainable Development Goals (SDGs).

In early 2022, BNP Paribas launched its strategic plan entitled GTS (*Growth, Technology, Sustainability*), one of whose three pillars is to

accelerate and mobilise all of the Group's business lines around the challenges of sustainable finance. The Group has set itself ambitious objectives in terms of energy transition, biodiversity, social inclusion, and sustainable savings, investments and financing by 2025 (see CSR dashboard presented in section 7.1.1 *General information, 2.a Strategy, business model and value chain* of the Group's Sustainability statements).

2024 was a new year of acceleration in the shift of BNP Paribas' financing from the energy sector to low-carbon energies ⁽¹⁾, mainly renewable energies, which already accounted for 76% of its total credit exposure to the energy production sector at 30 September 2024. The Group's objective is for this share to reach 90% by 2030.

(1) Low-carbon energies including electricity from renewable and nuclear sources. The scope of low-carbon energies could evolve according to technological progress to gradually go beyond the production of energy and include other steps in the value chain such as transport, storage or distribution of low-carbon energy.

CSR Policy and Governance

The Group as a whole is involved in monitoring ESG issues.

A Sustainable Finance Strategic Committee that meets every two months, chaired by the Chief Executive Officer of BNP Paribas, validates the overall sustainable finance strategy and decides on the commitments made by the Group. This committee met five times in 2024. The CSR policy is managed by the Company Engagement Department, represented on the Group Executive Committee, which regularly decides on CSR issues.

BNP Paribas' Board of directors determines BNP Paribas's business orientations and supervises their implementation by the Executive Management, taking the social, environmental and governance issues of BNP Paribas' activities into consideration. CSR-related topics were specifically addressed 34 times in 2024 by the Board of directors and during meetings of the Corporate Governance, Ethics, Nominations and CSR Committee (CGEN) and the Internal Control, Risk Management and Compliance Committee (CCIRC).

General reference frameworks

BNP Paribas' approach is guided by the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

Convinced of the importance of collective action, the Group is a member of the United Nations Principles for Responsible Banking (PRB)⁽¹⁾, the United Nations Global Compact and the Principles for Responsible Investment (PRI) through its subsidiaries BNP Paribas Asset Management, BNP Paribas Real Estate Investment Management and BNP Paribas Cardif. The Group is also a signatory of the Equator Principles.

Reference frameworks and Group's environmental involvement

BNP Paribas has been committed to the fight against climate change since 2010 and is committed to aligning its activities with the objectives of the 2015 Paris Agreement. It has continuously reduced its support for fossil fuels and at the same time accelerated its financing for low-carbon energies.

To define its environmental and climate-related objectives, the Group relies in particular on:

- benchmark scientific work, such as that of the IPCC (Intergovernmental Panel on Climate Change) and IPBES (Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services);
- forward-looking scenarios compatible with the objective of collective carbon neutrality in 2050, such as the International Energy Agency (IEA)'s Zero Net Emissions by 2050 Scenario.

The document "BNP Paribas environmental framework"⁽²⁾ aims to describe the environmental approach adopted by BNP Paribas in its three areas of action: climate and energy transition, natural capital and biodiversity, and circular economy.

BNP Paribas is also committed to preserving biodiversity through its financing and investment policies, a constructive dialogue with its clients, the coalitions in which it participates, philanthropy and support for research. The Group published its position in the document "BNP Paribas and the preservation of biodiversity"⁽³⁾ in order to clarify its challenges on this topic.

Reference frameworks and Group's involvement in human and social rights

The Group's commitments in terms of human rights are based on the provisions of international standards for the protection of human rights, and in particular the International Bill of Human Rights, the ten fundamental conventions of the International Labour Organization, the recommendations of the United Nations Guiding Principles on Business and Human Rights, and the ten principles of the Global Compact.

The Group wishes to promote respect for human rights in its sphere of influence and to treat all its employees with dignity.

Through its Code of conduct⁽⁴⁾, the document "BNP Paribas and Human Rights"⁽⁵⁾ and the Global Agreement signed with UNI Global Union on 4 November 2024⁽⁶⁾ (in the continuity of the Global Agreement signed in 2018), the Group recognises and undertakes to respect the highest standards of conduct and ethics, anti-corruption, respect for human rights and environmental protection, regardless of its activities.

(1) https://cdn-group.bnpparibas.com/uploads/file/bnp_paribas_2023_prb_reporting.pdf

(2) https://cdn-group.bnpparibas.com/uploads/file/BNP_Paribas_environmental_framework_2024.pdf

(3) https://group.bnpparibas.com/uploads/file/biodiversity_position_2021.pdf

(4) https://cdn-group.bnpparibas.com/uploads/file/220131_bntp_compliance_codeofconduct_2022_fr.pdf including customer interests, financial security, market integrity, conflicts of interest, professional ethics, respect for colleagues, protection of the Group, commitment to society, and the fight against corruption and influence peddling.

(5) https://cdn-group.bnpparibas.com/uploads/file/bnpparibas_and_human_rights.pdf

(6) https://cdn-group.bnpparibas.com/uploads/file/agreement_on_the_fundamental_rights_and_global_social_floor_of_the_bnp_paribas_group.pdf

OUR VIGILANCE APPROACH

As part of the preparation of its vigilance plan, BNP Paribas conducted risk mappings and a review of its existing risk assessment and control process and tools, on a scope consistent with the text of the law.

1 THE RISK UNIVERSE

The activities of BNP Paribas' corporate clients may involve risks in relation to human rights and fundamental freedoms, the health and safety of individuals and the environment.

In line with its CSR commitments, the Group has included in its reasonable vigilance approach the risks of serious violations of human rights and fundamental freedoms, and of harm to the health and safety of individuals and to the environment, considering in particular the following issues:

- issues related to human rights and fundamental freedoms: prohibition of child labour; prohibition of forced labour; respect for the rights of local communities, the right to property, the right to privacy, freedom of association and collective bargaining; non-discrimination, respect for diversity, gender equality and inclusion; respect for the right to an adequate standard of living; respect for adequate wages and fair and favourable working conditions;
- issues related to the health and safety of individuals: physical and mental health and safety at work for employees and consumers;
- environmental issues: climate change; GHG emissions (CO₂, methane, etc.); pollution and water scarcity; air pollution; soil pollution and quality; scarcity and depletion of commodities; waste production; degradation of ecosystems and biodiversity.

BNP Paribas also considers in its approach issues related to business ethics, compliance with laws and regulations and the protection of the interests of its clients.

Various risk identification exercises were carried out within the scope of the duty of care: risks related to employees, purchasing categories related to suppliers and subcontractors, and BNP Paribas' banking and financial activities, including the distribution of financial products and services to individuals and financing, investment and advisory activities for the Group's corporate clients.

1.1 Mapping of risks concerning employees

In 2024, the Group is present in 64 countries. With regard to all the human rights risks that could impact its employees, the Group has relied on indicators based on reference sources provided by Verisk Maplecroft, enabling it to determine a level of criticality by risk type (arithmetic average of each theme by country, updated annually):

- risks related to freedom of association and collective bargaining, including freedom of association and trade union negotiations, and freedom of assembly;
- risks of discrimination, inequality and exclusion, including discrimination in the workplace, minority rights, gender minorities, and women's rights;
- occupational health and safety risks;
- risks related to working conditions, including adequate wages, decent working time, child labour and forced labour.

At the end of 2024, the breakdown of BNP Paribas' workforce by social risk category and the level of criticality in the countries in which the Group operates is as follows:

Criticality <i>(score from 0 to 10)</i>	Freedom of association and collective bargaining	Discrimination, inequality and exclusion	Occupational health and safety	Working conditions
Very high (≤ 2.5)	0%	0%	0%	0%
High (> 2.5 and ≤ 5)	0.5%	5.8%	7.4%	0.3%
Medium (> 5 and ≤ 7.5)	24.6%	33.6%	16.6%	25.8%
Low (> 7.5)	74.9%	60.7%	76.0%	73.9%
TOTAL	100%	100%	100%	100%

On the basis of these analyses, more than 87% of the Group's workforce is located in countries with a low or medium criticality on all the social risk themes selected.

1.2 Mapping of risks concerning suppliers and subcontractors

The central Procurement & Performance (P&P) team has set up an ESG risk mapping of the Group's non-production purchasing categories ⁽¹⁾. This mapping is the result of a market approach led by Afnor in 2018, adapted by BNP Paribas to its own purchasing subcategories such as intellectual services, software, IT equipment, employee travel, databases, data centres, office supplies, etc.

Purchasing categories and subcategories are classified according to four levels of criticality based on the following risks:

- fair practices and ethics: fraud and corruption, protection of personal data, property rights and patents;
- human rights and social conditions: child labour, forced labour and modern slavery, discrimination, health and safety, working conditions and freedom of association;
- environment: climate change and greenhouse gases, damage to biodiversity, depletion of natural resources, pollution (water, air, soil), waste and end-of-life management.

In assessing the level of risk, the mapping adds indications on the type of production and the context related to the country (supply chain, business environment).

The breakdown of BNP Paribas' purchasing subcategories by level of criticality at the end of 2024 is as follows:

Criticality	Purchasing subcategories	% of total	Corresponding amount	
			In thousands of euros	% of total
Very high	15	6%	262,411.76	3%
High	44	19%	858,661.67	9%
Medium	134	57%	7,294,110.58	79%
Low	43	18%	819,988.46	9%
TOTAL	236	100%	9,235,172.46	100%

This analysis covers 93% of the expenditure base at the end of 2024 (EUR 9.89 billion).

Purchasing subcategories with a very high level of criticality are mainly in the real estate sector (works, waste management, etc.) or in technology (IT equipment, servers, telecoms, etc.).

With regard to production purchases, an analysis was carried out at the level of the subsidiaries concerned by specific purchases, which made it possible to identify the ESG risks of the main suppliers and to prioritise the measures to be implemented.

1.3 Mapping of risks concerning the distribution of financial products and services to individual customers

The Group has identified the following main risks in the distribution of financial products and services to its individual customers:

- the risk of discrimination in access to products and services;
- the risk of inadequate decisions made by customers and of indebtedness that would significantly impact their financial situations and living conditions, due in particular to a lack of transparent, clear and non-misleading information;
- the risk of infringement of the protection of their personal data and their right to privacy.

1.4 Mapping of risks concerning financing, investment and advisory activities for corporate clients

The activities of BNP Paribas' corporate clients may involve risks in relation to human rights and fundamental freedoms, the health and safety of individuals and the environment. Since 2010, BNP Paribas has gradually deepened and expanded its system to manage the ESG risks that may affect its financing, investment and advisory activities for corporate clients.

Initially focused on the most sensitive sectors from an ESG point of view (with the development of sectoral policies ⁽²⁾), the system now covers all sectors of the economy in which the Group has clients.

To identify risks related to corporate clients, the Group relies on risk factors related to the countries and risk factors related to the business sector.

1.4.1 Risk related to the countries of operation of corporate clients

A level of environmental and social risk was defined for each country in which the corporate clients of the Group operate on the basis of reference sources provided by Verisk Maplecroft and Reporters Without Borders, and issued by recognised international organisations and NGOs, such as the International Labour Organization, the World Bank, the United Nations Environment Programme, Human Rights Watch, Transparency International and the World Resources Institute.

15 indicators cover the following topics: child labour; forced labour; rights to land, property and housing; freedom of association and collective bargaining; decent wages; decent working time; migrant workers; occupational health and safety; environmental regulatory framework; biodiversity and protected areas; deforestation; waste management; water quality; water stress; freedom of the press.

(1) Production purchases correspond to purchases of goods and services specific to a commercial activity (for example, purchases of Arval vehicles), as opposed to non-production purchases.

(2) <https://group.bnpparibas/en/our-commitments/transitions/financing-and-investment-policies>.

The 15 indicators are weighted, which gives the breakdown of the countries of operation of the Group's corporate clients according to the following four levels of environmental and social risk (data from May 2024):

Level of environmental and social risk	Countries of operation of corporate clients	% of total
Very high	8	6%
High	29	22%
Medium	39	29%
Low	57	43%
TOTAL	133	100%

All business sectors of the Group's corporate clients are covered, including those that do not present intrinsic salient environmental and social risks, such as finance or insurance. Those with at least one risk are detailed below according to the number of salient environmental and social risks:

Business segments of corporate clients	Human rights and fundamental freedoms	Health and safety of individuals	Environment	Total
Agriculture, food, tobacco	7	1	6	14
Materials and minerals	6	1	6	13
Energy excluding electricity	4	1	6	11
Transport and storage	6	1	4	11
Suppliers (electricity, gas, water, etc.)	3	1	6	10
Equipment excluding IT	5	1	4	10
Chemicals excluding pharmaceuticals	3	2	3	8
Construction and public works	6	1	1	8
Information Technology (IT)	6	0	1	7
Consumer goods	4	0	2	6
Healthcare and pharmaceutical industry	2	2	1	5
Hotels, tourism, leisure	3	1	1	5
Automotive	0	1	1	2
TOTAL	55	13	42	110

It should be noted that the same risk may exist for different sectors, such as the risk related to water pollution (present in the Materials and Minerals and Agriculture sectors, among others) or the risk of forced labour (present among others in the Construction and Public Works sector and in the Consumer goods sector). These risk analyses enable:

- on the one hand, to provide a more specific framework for the business sectors of the Group's corporate clients that carry salient environmental and social risks;
- on the other hand, to develop financing and investments in activities with a positive impact.

1.4.2 Risk related to the business sectors of corporate clients

For each business sector, BNP Paribas has analysed the ones that had salient risks related to human rights and fundamental freedoms, the health and safety of individuals and the environment. These risks have been defined according to a methodology for rating the level of severity and occurrence of each risk, which is based on the United Nations Guiding Principles reporting reference framework. The level of risk inherent in each business sector has then been determined based on the presence of salient risks.

In addition, certain activities may be considered cross-functional in several sectors and are in this case treated as being exposed to all the risks of these sectors. This is the case, for example, for activities related to defence.

With regard to the specific activity of project financing, in accordance with the Equator Principles, major industrial and infrastructure projects are subject to systematic analyses of their environmental and social impacts. They are rated by risk level: projects graded A present significant risks and systematically involve enhanced due diligence with both an internal (*via* CIB ESG team) and external (by an independent consultant supporting investors) perspective; those graded B present more limited risks; and those graded C present minimal or no risks.

The table below details the project financing analysed in 2024:

	2024
Number of transactions concerned in the year ⁽¹⁾	44
Number of grade A transactions in the year	1
Number of grade B transactions in the year	37
Number of grade C transactions in the year	6

2 PROCEDURES FOR REGULAR ASSESSMENT OF THE SITUATION OF SUBSIDIARIES, SUPPLIERS OR SUBCONTRACTORS, WITH REGARD TO RISK MAPPING

The Group made an inventory of its existing systems and compared them with the elements required for the development of the vigilance plan and its risk mapping, which made it possible to ensure that the main risks were properly covered through existing systems for employees, main suppliers and sub-contractors and banking and financial activities, including the distribution of financial products and services to individual customers and financing, investment and advisory activities to corporate clients.

BNP Paribas' Risks ID process covers:

- all sets of activities and exposures, on and off-balance sheet, as well as new products and activities;
- all risk types and all geographies;
- all business lines and legal entities.

ESG dimensions are taken into account as risk factors, *i.e.* likely to trigger, promote or exacerbate the occurrence of a risk, whether financial or extra-financial (see section 5 *Risks and capital adequacy - Pillar 3* of this Universal registration document, Appendix 5: *Environmental, social and governance risk*).

The internal control plan (described in section 5 of the vigilance plan) is applicable to all the systems detailed in this section and makes it possible to regularly assess the situation of the Group's entities.

These controls also make it possible to monitor the risk mitigation actions and measures described in section 3 of the vigilance plan.

2.1 The system concerning employees

In order to assess and prevent the risks that could impact its employees, the Group relies on Group-level Human Resources policies, which apply up to the Group's highest level and to its subsidiaries, and on agreements negotiated with employee representative bodies, in particular on the Global Agreement which covers all employees, as well as Group-level or regional-level charters. These policies focus on the issues of freedom of association, non-discrimination, health and safety at work and working conditions.

In addition, as part of the new Global Agreement signed between the BNP Paribas Group and UNI Global Union in November 2024, a joint committee was created to monitor the implementation of the commitments made in the agreement. This committee may also meet in order to contribute to the continuous improvement of the Group's vigilance plan for the part relating to BNP Paribas' employees.

2.2 The system concerning suppliers and subcontractors

Within the Procurement Function, several teams deal with ESG risks related to suppliers and subcontractors.

In accordance with the deployment of the law on the duty of care, BNP Paribas articulates its ESG risk management system for its suppliers and subcontractors around the following items, in line with the ESG risk mapping for purchasing categories:

- ESG questionnaire templates used to assess ESG risks (Generic Due Diligence) when entering into relationships with external suppliers representing a contract value of more than EUR 200,000 (from the first euro for outsourced service providers), and during calls for tenders (assessment of ESG performance with a minimum weighting of 15% of ESG criteria, raised in 2023, compared with a minimum of 5% in 2022); the use of ESG evaluation questionnaires in calls for tenders and the inclusion of their results in the overall assessment of suppliers are included in the Procurement Function's control plan;
- a sustainable sourcing charter, setting out the reciprocal commitments of the Group and its suppliers and subcontractors from an environmental and social standpoint. This charter commits suppliers to promoting and enforcing the same principles with their own suppliers and subcontractors. Membership of this charter is part of the onboarding process with external suppliers;
- supplier risk monitoring rules, targeting certain ESG criteria used during the onboarding process and completed by thematic regulatory watches and external ESG ratings;
- on-site audits of targeted suppliers entrusted to an independent service provider on sensitive purchasing categories and organised by the central Procurement & Performance (P&P) team as part of a sectoral initiative conducted with other banks in France.

This framework set up within the central Procurement & Performance teams is gradually being rolled out to the other Procurement Function teams.

(1) Preliminary data available as of 31 January 2025.

In addition to this system, BNP Paribas, a signatory in France of the Charter for Responsible Supplier Relations (RFAR) promoted by the Mediation of Companies under the Ministry of the Economy and Finance, has been awarded the RFAR label for three Group entities since July 2024 for a three-year cycle (BNP Paribas SA, BNP Paribas Personal Finance France and BNL in Italy). As part of the commitments of the RFAR Charter, internal mediators independent from the Purchasing departments, whose contact details are published on the respective institutional websites, offer a means of recourse in the event of disagreement.

A specific system has been set up by BNP Paribas Real Estate given the specific nature of its activity with supplier charters adapted to each of its business lines (BNP Paribas Real Estate sustainable sourcing charter).

2.3 The system related to the distribution of financial products and services to individuals

The BNP Paribas Code of conduct sets out a set of rules aimed at maintaining a high level of ethics, particularly in business relationships and customer-related activities. In particular, it includes the steps to be taken to ensure fair treatment of customers and support people in financial difficulty to find a solution to their situation that suits all parties.

Non-discrimination in access to financial services is included in the internal policy for the protection of the interests of clients (PIC). This subject constitutes a specific area of expertise within the Compliance Function, which monitor these issues. The PIC policy, for which a summary is available on BNP Paribas' website ⁽¹⁾, defines the rules of organisation and conduct that must be applied by the Group throughout the relationship with BNP Paribas' customers, and at all stages of the product and service life cycle.

In addition, BNP Paribas is committed to its clients to being exemplary in the protection of their personal data. With the development of the global digital economy, regulators and data protection authorities around the world have considered that rapid technological change requires appropriate laws and regulations for data protection and their privacy. Data protection laws are thus being strengthened globally, some of which are applicable to a large number of Group entities (e.g. GDPR) and compliance with data protection rules has a paramount importance for BNP Paribas. The Group has strict internal procedures governed by the Group Data Office and RISK Departments to oversee the processing of personal data and implement best practices in this area.

► REPRESENTATION OF THE OVERALL ESG RISK MANAGEMENT SYSTEM

These various assessment tools make it possible to qualify the level of risk associated with the duty of care for each corporate client or activity and to manage the associated risk management measures. These measures include sectoral policies, specific ESG analyses and activity restriction or exclusion lists. They are differentiated

2.4 The system related to corporate financing activities

2.4.1 Global system

ESG risks related to corporate financing and investment activities are managed under the lead of the Group's Risk Appetite Framework, a Group risk management framework validated by Executive Management, which includes ESG risks (see the representation of the overall ESG risk management system below).

Considering the ESG aspect to be one of the Group's major challenges and a fundamental component of the client knowledge, the Group has generalised the integration of ESG evaluation criteria into the client life cycle: in the process of entering into a relationship (Know Your Client – KYC process) and during the various stages of the relationship, such as the granting of loans or the annual review. These steps are also an opportunity to verify compliance with the exclusion lists.

The general credit policy, as well as the specific credit policies, include ESG criteria.

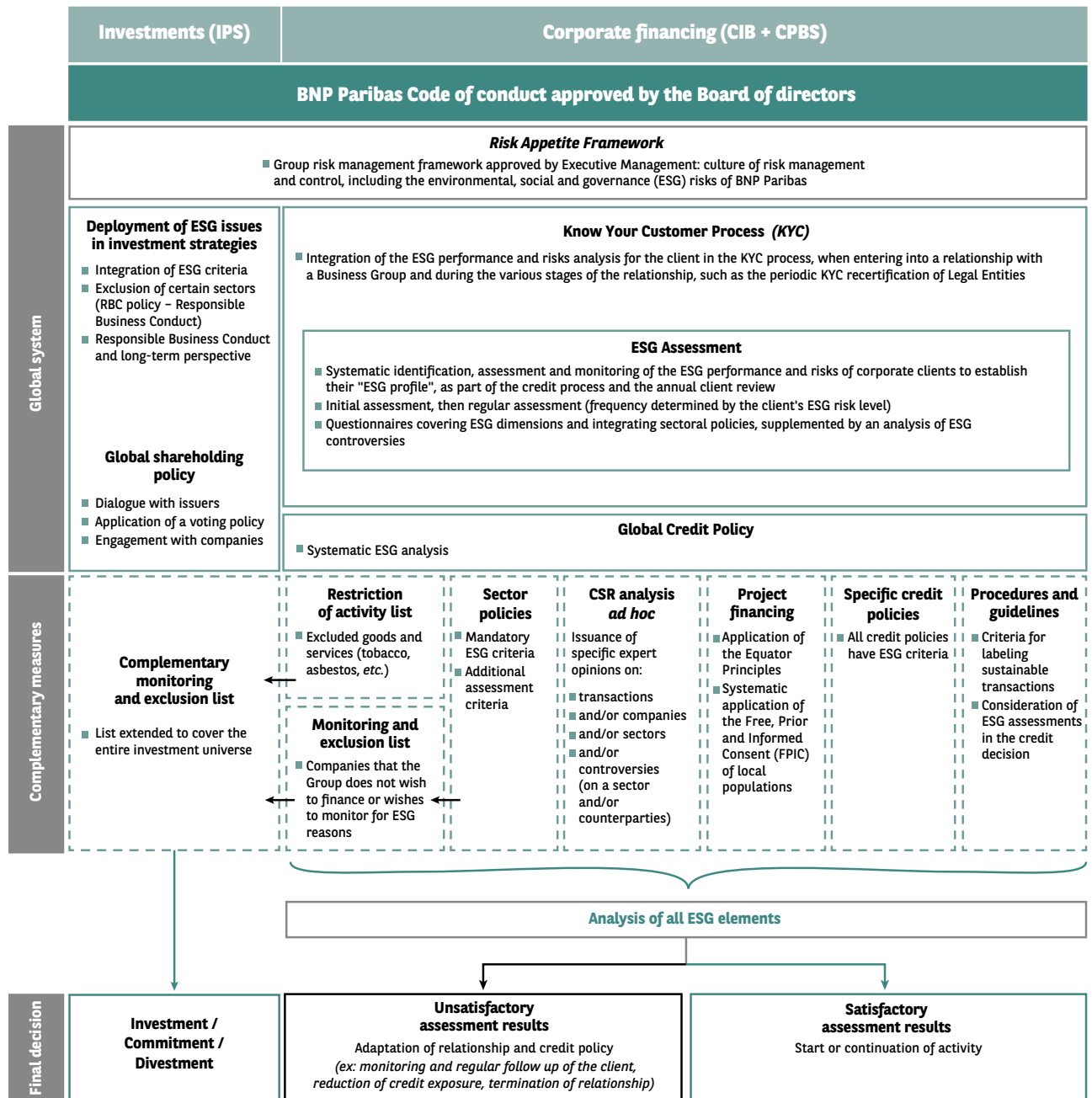
Since 2021, the ESG Assessment has provided a more systematic and comprehensive assessment of ESG topics along the entire credit chain: from the onboarding to the grant of a credit, monitoring and reporting. By covering five environmental (climate, pollution and biodiversity), social (labour rights and human rights of local communities and consumers) and governance (business ethics) dimensions across several questions, adapted to the client's sector of activity, the tool provides a global overview of the client's ESG profile, which is complemented by the analysis of controversies. It helps decision-making through the usual credit processes, in strengthening and documenting ESG due diligence at the counterparty, transaction and collateral levels.

Initially launched for the Group's large corporate clients, the ESG Assessment framework was enlarged in 2024 to medium-sized companies (companies with turnover of over EUR 50 million, selected on risk-based criteria) and to financial institutions.

Additional ESG risk assessment tools also exist for certain client companies for which the ESG Assessment is not deployed, such as questionnaires related to the law on the duty of care. These apply in particular to corporate clients operating in countries with very high or high environmental and social risks, and in sectors with salient risks, as defined by the mapping related to the Group's banking and financial activities (see sections 1.4.1 *Risk related to the countries of operation of corporate clients* and 1.4.2 *Risk related to the business sectors of corporate clients*).

according to investment and financing activities and are summarised in the table below. It is all these measures that enable to minimise the risk for the Group of being associated with a serious violation of human rights and the environment *via* its financial activities.

(1) https://cdn-group.bnpparibas.com/uploads/file/summary_of_global_policy_framework_of_bnp_paribas_pic_veng_nov_2021_1.pdf.



The Group has also published its responsible business principles charter ⁽¹⁾ for its corporate clients, thus reaffirming BNP Paribas' will to engage with clients whose business practices demonstrate a high level of governance and responsibility with respect to human rights and fundamental freedoms, the health and safety of individuals, and the environment.

2.4.2 The system related to project financing

As a signatory to the Equator Principles alongside 128 other financial institutions worldwide (at end 2024), and in its role as a financial service provider and advisor, BNP Paribas works with its clients to identify, assess, and manage the risks and environmental and social

impacts linked with major industrial and infrastructure projects. According to these principles, the negative impacts of these projects on communities, ecosystems or the climate must be avoided or minimised, mitigated and/or offset. Projects graded A present significant risks and systematically involve enhanced due diligence with both an internal (via CIB ESG team) and external (by an independent consultant supporting investors) perspective; those graded B present more limited risks; and those graded C have minimal or no risks.

(see the table in section 1.4 *Mapping of risks concerning financing, investment and advisory activities for corporate clients*).

(1) https://group.bnpparibas/uploads/file/bnpp_responsible_business_principles_ven.pdf

2.5 The system related to investment activities

The Group's asset management subsidiary, BNP Paribas Asset Management, and the Group's insurance subsidiary, BNP Paribas Cardif, implement their ESG strategies, which include, among other things, the application of the Group's sectoral policies (see section 1.4 *Mapping of risks concerning financing, investment and advisory activities for corporate clients*).

BNP Paribas Asset Management's Global Sustainability strategy⁽¹⁾, launched in 2019 and updated in December 2023, details the way in which ESG issues are deployed in investment strategies. It is based on the exclusion of certain sectors, engagement and dialogue (stewardship) as well as responsible business conduct and a long-term perspective. In order to promote ESG best practices within the companies in which the asset management company invests on behalf of clients, BNP Paribas Asset Management exercises its voting rights as a shareholder at Annual General Meetings.

3 APPROPRIATE ACTIONS TO MITIGATE RISKS OR PREVENT SERIOUS HARM

3.1 Concerning the Group's employees

The Group's commitments in terms of employee rights concern:

- freedom of association and collective bargaining: the Global Agreement includes the Group's commitments in this area; social dialogue is particularly developed within the scope of the European Works Council (covering more than 70% of the Group's workforce);
- non-discrimination, the fight against inequality and exclusion: these issues are at the heart of the Group's Code of conduct, in particular the "Respect for People" chapter, which aims to combat inappropriate behaviour. They are also integrated into the recruitment and career management processes. Lastly, gender equality is one of the commitments of the Global Agreement;
- occupational health and safety:
 - all employees benefit from a reference corpus on the personal and property safety, which notably establishes fundamental principles in terms of safety and security,
 - under the Global Agreement, all employees are covered in terms of healthcare, death and disability insurance and benefit from a minimum period of maternity leave. The new agreement includes minimum provisions for all for paid paternity leave, and for the settling-in leave,
 - the *We Care* occupational health and well-being programme has boosted the actions in the prevention of psychosocial risks, risks related to a sedentary lifestyle and actions to promote employee mental health;

- working conditions: BNP Paribas is attentive to compliance with the prohibition of forced labour within the Group and monitors employees under the age of 18 (the Group had one employee aged 17 in the United Kingdom at the end of December 2024). Employment is managed under collective agreements. In addition, respect for work-life balance is incorporated in the European Agreement on the prevention of work-related stress and the European Remote Working Charter.

With regard specifically to the risks of discrimination and the promotion of respect for persons, the Group has taken several measures to combat discrimination and promote respect for persons. This includes:

- an awareness-raising module entitled "Diversity, Equality & Inclusion" included in the mandatory *Conduct Journey* training;
- an objective relating to compliance with the Code of conduct assigned annually to all employees;
- the strengthening and global deployment of the "Respect for Persons" policy;
- communication to employees on whistleblowing channels and dedicated training courses for managers;
- raising employee awareness through *Inclusion Days* on equal opportunities, prejudice, disability and financial inclusion.

In order to mitigate psychosocial risks, the Group:

- continues its preventive actions around the health and well-being at work of its employees while adapting its managerial practices within the framework of the *We Care* programme;
- sets up programmes related to the prevention of psychosocial risks and work-related stress;
- has continued to support its employees towards a hybrid way of working including remote working by adapting managerial practices.

In order to promote professional equality, the Group:

- has set itself ambitious gender diversity targets at all levels of the organisation by 2025: 40% of women on the Group Executive Committee (ExCo) and Senior Management Positions (SMP), and 35% of women in the IT line by 2030 as part of the *Women in IT* programme;
- has continued its actions based on the development of employee skills, in roles that are structurally unbalanced in terms of gender (such as IT, Data, Digital, market activities within CIB);
- has carried specific equal pay measures for several years now, notably as part of the Mandatory Annual Negotiations at BNP Paribas SA in France.

(1) BNP Paribas Asset Management Global Sustainability Strategy 2023-2025, <https://doc.finder.bnpparibas-am.com/api/files/4b10d1ad-901d-4bbe-8a7c-007ad48c450e>.

3.2 Concerning BNP Paribas' suppliers and subcontractors

In addition to the system described in section 2.2 *The system concerning suppliers and subcontractors*, the Procurement Function has set up:

- contracts covering requirements on environmental and social criteria which, since 2018, have also included the option of ending contractual relations if suppliers do not comply with the Group's ESG requirements;
- training for the Procurement Function: in 2024, 96% of the employees of the entities included in the annual reporting were trained in one or other of the mandatory training modules (Human Rights in the Company or Sustainability Basics);
- ESG objectives in the annual objectives of the buyers of the central Procurement & Performance (P&P) teams.

This framework set up within the central P&P team is gradually being rolled out to the other Procurement teams.

In France, as part of its Diversity & Inclusion policy, the Group has a committed policy to promote the development of purchases from the STPA (protected and adapted work sector) and SIAE (sector for inclusion through economic activity) structures. BNP Paribas SA's agreement in France on the employment, professional integration and retention of people with disabilities includes the objective of reaching EUR 2 million in revenue excluding tax by 2025 with the STPA. This agreement was renewed for a period of three years (2023-2025), and approved by the French Ministry of Labour. This commitment to diversity in procurement is gradually being extended to the entire social entrepreneurship sector. The BNP Paribas Group, part of the *Collectif d'Entreprises pour une économie plus inclusive* ⁽¹⁾ (business collective for a more inclusive economy), aims to increase its inclusive purchases in France by 30% by 2025 (from STPAs and SIAEs), compared to 2022.

With regard to its suppliers specific to the real estate business, BNP Paribas Real Estate has put in place an appropriate sustainable sourcing charter, signed by the suppliers, which mentions the salient environmental and social risks identified.

To address the specific nature of its purchases and suppliers, Arval has defined a sustainable sourcing plan that will be implemented from 2025, including a supplier assessment, training for buyers and community outreach for suppliers.

3.3 Concerning the distribution of financial products and services to individuals

BNP Paribas deploys several actions to mitigate the risks related to its distribution of products and services to individuals.

The Group:

- optimises the sale of products and services adapted to the needs and situation of customers, according to the rules defined by the policy for the protection of the interests of clients (PIC);

- ensures that the information provided is clear, transparent and non-misleading and enables customers to make informed decisions;
- ensures the accuracy of information relating to the environmental or social characteristics of the products offered;
- prioritises the interests of customers rather than those of the Group or its employees;
- guarantees the protection of the personal data of individual customers and respect for their right to privacy;
- trains employees (particularly front office and management) to the protection of the interests of clients and the protection of their personal data;
- deploys a system for listening to the voice of customers on a broad and continuous basis;
- manages customer complaints;
- ensures non-discrimination in the access of individual customers to financial products and services, by improving access to credit and insurance and by supporting customers who are vulnerable due to their disability or financial situation;
- implements a financial inclusion approach through specific offers such as Nickel and by supporting Microfinance Institutions:
 - Nickel's offer, available in five European countries (France, Spain, Belgium, Portugal and Germany), enables the opening of an account with an IBAN, an unconditional payment card and home insurance available online,
 - support for Microfinance Institutions, with microloans benefiting people in 13 countries in 2024, including many new emerging countries;
- prevents the risk of indebtedness, in particular by supporting individual customers in managing their budget and by offering financial education solutions (for example the AXELLE online platform of Commercial & Personal Banking in France or the *Responsible Budget* programme of BNP Paribas Personal Finance in Belgium, France and Italy). Commercial & Personal Banking in France also offers the "Forfait de Compte" solution for people in a financially vulnerable situation ⁽²⁾. This specific offer was created to control their budget with a range of banking products and services at a moderate price and to limit fees in the event of payment incidents and account irregularities.

3.4 Concerning financing, investment and advisory activities for corporate clients

The risk mitigation and serious harm prevention system is based on the Group's financing and investment sectoral policies ⁽³⁾. These policies cover the sectors of agriculture, defence, nuclear energy, palm oil, mining, wood pulp, oil and gas, energy production from coal, and are subject to changes to better take into account the new challenges of the sectors covered.

(1) <https://www.collectif-economie-plus-inclusive.fr>

(2) The situation of financial vulnerability is assessed on the basis of criteria defined by the regulations (articles L.312-1-3 and R.312-4-3 of the French Monetary and Financial Code) based on events of which BNP Paribas is aware.

(3) <https://group.bnpparibas/en/our-commitments/transitions/financing-and-investment-policies>

They are supplemented by internal application guides. For example, the oil and gas policy was reinforced in 2023 to include conventional oil and gas resources.

In addition, the Group's risk mitigation and serious harm prevention system also relies on specific actions implemented with regard to risk mapping, such as the management of controversies concerning environmental, social and governance issues.

BNP Paribas Asset Management and BNP Paribas Cardif use collaborative dialogue (working groups or coalitions whose members cooperate to act jointly with companies) to encourage improvements in practices. For example, these two entities are members of the Climate Action 100+ initiative and, as such, regularly engage in dialogue with companies ranked among the world's top greenhouse gas emitters to improve their climate change governance and strategy. BNP Paribas Asset Management is also a founding member of the initiative Nature Action 100.

3.4.1 Activity restriction according to the severity of the environmental and social impacts

BNP Paribas has defined strict ESG criteria in many sectors, compliance with which determines the activity with its corporate clients, whether at the level of a client (which does not comply with the prohibitive criteria of a sectoral policy), a sub-sector (unconventional hydrocarbons), or a sector as a whole (such as tobacco).

In order to identify the companies presenting the highest environmental and social risks, the Group defines and applies sectoral policies, while managing activity restriction lists according to the level of ESG risks observed, *i.e.* a list of excluded companies (1,753 at end 2024) and a list of companies placed under monitoring (983 at end-2024). Companies placed on the monitoring list are subject to an engagement by the Group to make lasting changes to their practices and reduce their ESG risks. For excluded companies, the Group prohibits any financing or investment relationship.

BNP Paribas has also compiled an exclusion list⁽¹⁾ of specific goods and activities that the Group is unwilling to finance, such as tobacco. These lists are periodically updated using data supplied by clients and external sources, and by analysing the key controversies involving corporate clients accused of serious violations of human rights and the environment.

With regard to the reduction in BNP Paribas' support for fossil fuels:

- since end 2017, the Group stopped supporting companies and infrastructure whose primary business is exploration, production and export of gas/oil from shale, oil from tar sands or gas/oil production in the Arctic. In 2022, BNP Paribas decided to no longer provide products and services to companies where more than 10% of the activity is related to tar sands and shale oil and gas;

- in 2020, BNP Paribas announced a strategy for a complete exit from the thermal coal value chain by 2030 in the European Union and OECD countries, and by 2040 in the rest of the world. Sectoral policies covering the mining and dedicated infrastructure sectors were also reviewed;

- 2024 was a new year of acceleration in the shift of BNP Paribas' financing of the energy sector to low-carbon, mainly renewable energy sources⁽²⁾, which already accounted for 65% of the Group's total credit exposure to the energy production sector on 30 September 2023. At the end of September 2024, they represented 76%. In line with its strategy of sharply accelerating the financing of the energy transition, BNP Paribas has set itself the target of ensuring that low-carbon energies make up 90% of its credit exposure to energy production by 2030. The continuous action to accelerate new loans to low-carbon energies and the divestment of fossil fuels will make it possible to achieve the 2030 objective.

With regard to combatting deforestation:

- in early 2021, BNP Paribas strengthened its commitment to combatting deforestation through its policy on agriculture⁽³⁾, the scope of which includes all financial products and services provided by the Group, including participation in the issuance of bonds;

- in accordance with its sector policy on agriculture, BNP Paribas will only provide financial products or services to companies producing or purchasing beef or soybeans in the Brazilian Amazon and Cerrado that have adopted and implemented a "zero-deforestation" strategy in their production and supply chain by 31 December 2025 at the latest, and if they have, by that date, full traceability of their direct and indirect value chain in these regions. Clients' compliance with the mandatory criteria mentioned in this policy will be assessed following the publication of Annual Reports or client audits during 2026;

- since 2021, an analysis of the portfolio of producers, meat packers and traders involved in the value chain of beef from Brazil has been carried out in order to assess their progress and engage in a dialogue;

- in addition, in 2022, BNP Paribas announced that it would not finance any greenfield or brownfield oil and gas projects, nor any associated infrastructure in the Amazon or Arctic regions.

3.4.2 Project financing

The Group has been a signatory of the Equator Principles since 2008. These aim to avoid, reduce, mitigate or offset the negative impacts of major industrial or infrastructure projects on communities, ecosystems and the climate, with additional measures in certain countries.

(1) https://cdn-group.bnpparibas.com/uploads/file/bnpparibas_csr_exclusion_list.pdf

(2) Renewable energy, including wind and marine energy, photovoltaic solar energy, concentrated solar energy, hydroelectricity, geothermal energy, bioenergy (including biofuels except for first generation);

Low-carbon energies including electricity from renewable and nuclear sources. The scope of low-carbon energies could evolve according to technological progress to gradually go beyond the production of energy and include other steps in the value chain such as transport, storage or distribution of low-carbon energy.

(3) https://cdn-group.bnpparibas.com/uploads/file/bnpparibas_csr_sector_policy_agriculture.pdf

For all of its project financing activities, BNP Paribas encourages its clients to obtain the Free, Prior and Informed Consent (FPIC) of the local communities impacted by their projects.

Specific restrictions concerning protected areas (such as those listed by the IUCN) are also included in the Group's financing and investment policies.

3.4.3 ESG controversies' management

As part of the assessments of corporate clients, the Group identifies and analyses client-related ESG controversies (see section 2.4 *The system related to corporate financing activities*).

When a controversy arises concerning one of its clients, the Group first takes a risk approach according to the geography and criticality of the subject. An internal analysis combines the available information, in connection with the business line hierarchy and the Group's Company Engagement Department, in order to estimate the severity of the controversy and to determine the list of questions that the client must answer. After contact with the latter, their additional responses and any action plan (taking into account the time horizon) are analysed in order to reach a final decision: continue the activity if everything is deemed satisfactory; suspend operations if doubts remain (with request for the implementation of a remediation plan and monitoring until satisfaction); exclusion if the situation cannot be remedied.

BNP Paribas also deepens its sector analyses on controversies affecting an entire sector. The Group then issues internal recommendations as to the criteria to be monitored, and specific questions are included in the assessment system for clients in these sectors.

3.5 Alignment of the credit and investment portfolios with the net-zero objective in 2050

Pursuing its commitments to combat global warming, BNP Paribas has decided to gradually align its credit and investment portfolios with the objective of financing a carbon-neutral economy by 2050, which corresponds to a temperature increase limited to 1.5°C compared to the pre-industrial era.

3.5.1 Significant resources for applying the Group's climate vigilance

BNP Paribas has dedicated a large number of employees from several teams to help implementing the Group's alignment strategy:

- the Climate Analytics & Alignment (C2A) team is made up of employees from the Group's Company Engagement Department and CIB Global Banking EMEA. It develops and deploys methodologies for aligning portfolios by business sector, in accordance with market standards, and calculates metrics at the level of the Group's credit portfolio to manage it in the targeted sectors and establish an external reporting;
- the Low-Carbon Transition Group (LCTG), created in 2021, is a global platform bringing together an ecosystem of nearly 250 specialised bankers who support clients - companies and international institutions - in accelerating their transition to a sustainable and low-carbon economy. A continuum of banking and non-banking solutions is therefore provided for the decarbonisation of the economy, and particularly the energy, mobility and industry sectors. In addition to renewable energies

and nuclear, the Bank is developing specific expertise to support the development of new value chains such as batteries, green hydrogen and low-carbon fuels, as well as CO₂ sequestration. At the same time, the Low-Carbon Transition for SMEs & MidCaps (LCTM) is a team created in 2022 dedicated to this customer segment and which aims, with the CPBS sales teams, to accelerate support for the sustainable transition of clients and contribute to managing the Group's credit portfolio in line with its climate commitments;

- the CSR network, which operates in the divisions, business lines, branch networks, functions and subsidiaries to facilitate the deployment of the CSR policy throughout the Group, with more than 300 employees devoting all or most of their time to managing CSR issues;
- the RISK Function, which continuously performs a second-line control over credit and counterparty risks, market risk, interest rate and foreign exchange rate risks on the banking book, liquidity risks, insurance risks, and operational risk, including technological and cybersecurity risks, data protection risks, modelling risks and environmental and social risk factors, as well as the associated governance risks;
- the Finance, RISK and ALM Treasury Functions have created a shared team called Stress Testing & Financial Simulations (STFS), responsible for rolling out stress testing activities, ICAAP (Internal Capital Adequacy Assessment Process) tests and internal capital tests together with financial planning across the Group's entities and activities. Stress test methodologies are tailored to the main categories of risk and are subject to independent review.

3.5.2 Decarbonisation objectives for nine of the highest-emitting sectors

In the Sustainability statements published in 2025, BNP Paribas presents in detail the stages of the alignment of its credit and investment portfolios. These statements explain the strategy implemented by the Group and stipulate what data is used, the methodologies for calculating the alignment trajectory and the methods for managing the portfolio. The Sustainability statements detail (in section 7.1.2 *Climate change*) the Group's progress in achieving its targets for the reduction of financed greenhouse gas (GHG) emissions in nine business sectors.

These nine sectors, which are all among the highest emitters, are as follows:

- power generation, for which the Group has undertaken to:
 - increase the share of renewable energies in the energy mix that it finances to reach more than 66% in 2025 and reduce the share of coal in the energy mix that it finances to less than 5% in 2025,
 - reduce the CO₂ intensity of its financing by at least 30% in 2025 compared to 2020;
- oil and gas, for which the Group has undertaken to:
 - reduce its credit exposure to oil exploration and production activities by 80% between September 2022 and 2030,
 - reduce its credit exposure to gas exploration and production activities by 30% between September 2022 and 2030,

- reduce its financed GHG emissions in absolute value for the oil and gas sector by 70% in 2030 compared to September 2022;
- automotive, for which the Group has undertaken to:
 - increase the share of electrified vehicles in the automotive mix that it finances to reach more than 25% by 2025,
 - reduce the CO₂ intensity of its financing by at least 25% in 2025 compared to 2020;
- steel, for which the Group has undertaken to:
 - reduce the CO₂ intensity of its financing by at least 25% in 2030 compared to 2022;
- aluminium, for which the Group has undertaken to:
 - reduce the intensity of GHG emissions of its financing by at least 10% in 2030 compared to 2022;
- cement, for which the Group has undertaken to:
 - reduce the CO₂ intensity of its financing by at least 24% in 2030 compared to 2021;
- aviation, for which the Group has undertaken to:
 - reduce the intensity of GHG emissions of its financing by at least 18% in 2030 compared to 2022;
- shipping, for which the Group has undertaken to:
 - reduce the intensity of GHG emissions of its financing by 23% to 32% in 2030 compared to 2022;
- commercial real estate, for which the Group has undertaken to:
 - reduce the intensity of GHG emissions of its financing by 31% to 41% in 2030 compared to 2022;
- the Group also published the GHG emissions intensity, at the end of 2022 and at the end of 2023, of its financing in the residential real estate sector.

In 2022, BNP Paribas Asset Management and BNP Paribas Cardif published their net-zero commitments:

- regarding BNP Paribas Asset Management's investments, these commitments are as follows:
 - reduce the carbon footprint (scopes 1 and 2) of its investments in scope (around 50% of assets under management to date, with the objective of reaching 100% over time), by 30% by 2025 and by 50% by 2030 (compared to 2019),
 - align the relevant investments (also around 50% of assets under management to date) with the "net zero" principle: 60% by 2030 (aligned or in the process of aligning with the "net zero" objective) and 100% by 2040,
 - substantially increase investment solutions in climate and environmental issues,
 - dialogue with clients on their net-zero transition;
- regarding BNP Paribas Cardif's investments, these commitments are as follows:
 - reduce the carbon footprint of directly held equity and corporate bond portfolios by at least 23% by 2024 (compared to 2020),

- reduce the carbon intensity of directly held office buildings by at least 12% by 2030 (compared to 2020),
- achieve a carbon intensity of less than 125 g of CO₂/kWh for electricity producers in directly-held equity and bond portfolios by the end of 2024,
- allocate at least EUR 800 million per year to environment-themed investments;
- regarding shareholder engagement or stewardship, these commitments are as follows:
 - support the climate action of companies (by including climate considerations in the voting policy, by supporting relevant shareholder proposals in this area),
 - dialogue with companies individually and collectively on their climate strategy and the ambition to achieve net zero GHG emissions,
 - advocate for a climate lobbying policy aligned with the Paris Agreement.

3.6 Sustainable finance activities

The Group's CSR strategy is structured to contribute to achieving the United Nations' 17 Sustainable Development Goals (SDGs). This strategy involves supporting all customers, individuals, companies and institutions, in their transition to a low-carbon economy, respectful of the planet's resources and enabling the respect of human rights and the inclusion of the most vulnerable.

To this end, the Group continues to expand the range of products and services to support and even accelerate this transition including:

- sustainable loans, for which the internal classification is based on external market standards such as those of the Loan Market Association and the European Taxonomy in Europe;
- sustainable bonds, according to the guidelines of the International Capital Market Association (ICMA), including, among others, green bonds and social bonds;
- sustainable investment funds, which make it possible to direct investments towards assets incorporating ESG criteria, in other words funds classified as articles 8 and 9 according to the Sustainable Finance Disclosure Regulation (SFDR), whether they promote environmental or social characteristics (article 8), or have a sustainable investment objective (article 9);
- financing for low-carbon energy production;
- support for impact enterprises (including microfinance institutions):
 - through banking services or investment,
 - through financing, in particular with impact bonds, which enable the financing of innovative projects led by associations or impact enterprises, with a payment for results model dependent on social, environmental and development indicators, or the circular economy.

4 DIALOGUE WITH STAKEHOLDERS AND WHISTLEBLOWING MECHANISM

4.1 Dialogue with stakeholders

Dialogue with stakeholders is at the heart of BNP Paribas' social and environmental responsibility. The Group's commitment to maintaining an open and constructive dialogue with its stakeholders aims first and foremost to better identify and understand the interests, points of view and expectations of its stakeholders, as well as the impacts of its activity.

The Group can thus take them into consideration in the evolution of its product and service offering, in line with the real needs of its customers, the evolution of its business lines and the definition of its strategy.

This dialogue is also key to informing stakeholders of the Group's decisions and actions, and to explaining them, with the aim of transparency and clarity.

The Group identifies several stakeholders of different types and with different levels of interaction. In particular, can be noted its customers (individuals, professionals, companies and institutions), its employees and employee representative bodies, its shareholders (individual and institutional investors), its suppliers, financial and extra-financial rating agencies, regulatory bodies and public authorities, civil society and its organisations.

BNP Paribas has implemented a structured approach to dialogue with its stakeholders and relies on several internal policies governing relations with them to frame its approach. For example:

- with regard to customers, the clients' interests protection policy defines the rules of organisation and conduct that must be applied by the Group throughout the relationship with the customer, and at all stages of the life cycle of products and services;
- the BNP Paribas sustainable sourcing charter sets out the Group's ethical principles and commitments with its suppliers.

In addition, each type of stakeholder has identified contacts within BNP Paribas, at the level of a function or business line. The Group adapts and deploys several channels of dialogue with its stakeholders, the main ones of which are listed below.

- Customers are in contact with the Group's dedicated sales teams according to their profile and needs. Their interests and points of view are collected as part of the Advocacy programme to listen to the voice of customers (for example Net Promoter Score, relationship surveys, transactional surveys). These channels of dialogue are supplemented by the processing of complaints at the level of each Group entity and by the services of independent mediators;
- for employees and employee representative bodies, the Group's Human Resources are the main contacts. The interests and

points of view of employees are gathered through targeted surveys, social dialogue, employee networks and the whistleblowing platform. The Global Agreement, renewed in 2024, provides for the possibility of specific exchanges with, in particular, the trade union federation UNI Global Union, within a dedicated annual monitoring committee;

- for shareholders (individual and institutional investors) and financial and extra-financial rating agencies, the dedicated contacts are Investor Relations and Financial Information (RIIF) and the ESG Transparency & Performance team (ESG T&P) within the Company Engagement Department for ESG topics. BNP Paribas presents its CSR strategy to investors several times a year and regularly keeps extra-financial analysts informed;
- for BNP Paribas suppliers, the Procurement & Performance (P&P) teams organise regular monitoring meetings to collect feedback and implement progress plans. The central team also organises annual events dedicated to the Group's key suppliers and conducts satisfaction surveys (SME Pacte barometer), which are also channels for reporting information and dialogue. As a signatory in France of the Responsible Supplier Relations Charter (RFAR) promoted by the Mediation of Companies, BNP Paribas also has independent internal purchasing mediators in France and Italy, whose contact details are published on the Group's institutional websites and BNL's, and which offer a remedy channel in the event of a dispute;
- regulatory bodies and public authorities hold regular discussions with the Institutional Affairs department, in accordance with the charter for responsible lobbying to public authorities ⁽¹⁾;
- civil society and its organisations are in contact with the teams of the Company Engagement department and the business lines. Within the Company Engagement Department, a team is dedicated to relations with advocacy NGOs.

All of these discussions enable the Group to better understand its impacts on people and the environment and the associated expectations of its stakeholders, to focus its actions on vigilance issues and to strengthen their effectiveness.

4.2 Whistleblowing framework

BNP Paribas Group pays particular attention to the concerns of customers, employees, shareholders, suppliers and society as a whole. The Group is committed to listening, understanding and seeking to respond to the concerns raised by its stakeholders in a fair and effective manner.

BNP Paribas employees should report any effective or suspected breach of the Code of conduct, Group policies and procedures, or regulations. Employees can report issues to their line manager or another manager, or to Human Resources for issues relating to respect for persons, or to a Compliance alert channel.

(1) https://cdn-group.bnpparibas.com/uploads/file/charter_representation_bnpp_uk_july2022.pdf

Any suspicion by a BNP Paribas employee of a serious or potentially serious violation of human rights and fundamental freedoms, the health and safety of individuals, and the environment may be reported according to this whistleblowing system, except when specified otherwise by local regulations or procedures.

The whistleblowing system is open to Group employees and external third parties *via* the “BNP Paribas Whistleblowing Platform”, accessible on the BNP Paribas intranet and institutional website ⁽¹⁾.

The protection of whistleblowers against the risk of retaliation was strengthened in 2022, in line with the transposition of the European Directive 2019/1937. Any person that needs to know of an alert during its processing is formally committed to respecting the

confidentiality of the information relating to the whistleblower and any person involved. In addition, the Group guarantees the protection of whistleblowers against the risk of retaliation, and any person considering themselves the victim of retaliation may issue an alert that will be dealt with according to the standards defined by the Human Resources Department. This protection applies regardless of the channel used by the whistleblower.

The whistleblowing system is presented in the mandatory Code of conduct training course.

Alerts are analysed and processed, with 278 alerts reported *via* the Compliance alert channels in 2024.

5 SYSTEM FOR MONITORING THE MEASURES IMPLEMENTED AND ASSESSING THEIR EFFECTIVENESS

► TABLE OF INDICATORS MONITORED AND REPORT ON OPERATIONAL IMPLEMENTATION

Topic	Indicator	2024	2023	Risk(s) addressed
Employees	Number of Pulse surveys carried out during the year, number of countries concerned and average participation rate	46 surveys in 62 countries with an average participation rate of 72%	71 surveys in 57 countries with an average participation rate of 71%	Risks related to working conditions, freedom of association and collective bargaining, risks of discrimination, inequality and exclusion, risks related to health and safety at work
	Percentage of employees who completed ethics or conduct training during the year	98.1%	Between 96% and 99%	Risks related to non-compliance with fair practices and ethics, fraud and corruption
	Employment rate of employees with disabilities	3.2% ⁽¹⁾	3% ⁽²⁾	Risks of discrimination, inequality and exclusion
Suppliers and subcontractors	Number of ESG evaluations of external suppliers carried out in a new relationship context	5,214	5,312	Risks related to non-compliance with the principles set out in the BNP Paribas sustainable sourcing charter: <ul style="list-style-type: none"> ■ fair practices and ethics: fraud and corruption, protection of personal data, property rights and patents; ■ respect for human rights and social conditions; ■ environmental protection

(1) <https://group.bnpparibas/en/direct-access/whistleblowing>.

Vigilance plan

Topic	Indicator	2024	2023	Risk(s) addressed
Distribution of financial products and services to individuals	Number of surveys conducted during the year among individual customers in the four Domestic Markets (France, Belgium, Italy and Luxembourg)	7.3 million surveys sent by e-mail. In addition, nearly 850,000 feedback items were collected via live surveys on digital channels (pop-in, pop-up)	7 million surveys sent by email. In addition, nearly 800,000 feedback items were collected via live surveys on digital channels (pop-in, pop-up)	Risks of discrimination in access to products and services Risks of inadequate customer decisions and indebtedness
	Percentage of beneficiaries of the specific "Forfait de Compte" offer from Commercial & Personal Banking in France, out of the total number of customers identified as financially vulnerable	19.7%	19.5%	Risks of non-accessibility to financial products and services, covering both non-discrimination and contribution to social inclusion through financial inclusion
Financing, investment and advisory activities to corporate clients	Number of companies on the activity restriction lists, of which excluded and monitored companies	2,736 companies of which 1,753 excluded and 983 under monitoring	1,718 companies of which 1,432 excluded and 286 under monitoring	Risks related to human rights and fundamental freedoms Risks related to the health and safety of individuals Risks related to the environment
	Number of resolutions during the year opposed by BNP Paribas Asset Management at Annual General Meetings for ESG reasons	Opposition to 2,294 resolutions proposed by 371 companies	Opposition to 1,521 resolutions proposed by 271 companies	Risks related to human rights and fundamental freedoms Risks related to the health and safety of individuals Risks related to the environment
	Share and amount of low-carbon energies in the Group's financing of energy production at the end of the year, of which renewable	76% (at end September 2024) EUR 36.8 billion, of which EUR 34.2 billion for renewable energies	65% (at end September 2023) EUR 32 billion, of which EUR 28.8 billion for renewable energies	Risks related to the environment: climate change and greenhouse gases, damage to biodiversity, resource depletion
Whistleblowing mechanism	Number of alerts received by the Compliance Function through the whistleblowing system	278	333	Risks related to human rights and fundamental freedoms
Dialogue with stakeholders	Number of interactions during the year with advocacy NGOs	182	183	Risks related to the health and safety of individuals
	Number of interactions during the year with investors on ESG topics	87	96	Risks related to the environment

(1) Data collected in the Social Reporting campaign, which covers 95% of the Group's employees in FTE as of 31/12/2024.

(2) Employment rate in the entities covered by the Social Reporting campaign that specifically report monitoring the number of employees with disabilities in their workforce (covering 91% of the Group's employees in FTE as of 31/12/2023).

5.1 Employees

In addition to the indicators concerning BNP Paribas' employees listed in the table above and the three indicators relating to the Group's social responsibility included in the CSR dashboard (presented in section 7.1.1 General information 2.a *Strategy, business model and value chain* in the Group's Sustainability statements), other objectives are monitored by the Group with regard to its employees.

As part of the Global Agreement, a joint monitoring committee responsible for the implementation of the Agreement meets once a year to assess the progress made under the agreement and to take stock of the past year on the basis of a grid of indicators by country and geographical area.

In terms of gender pay equality, the Group set a dedicated budget of EUR 10 million for BNP Paribas SA over two years in 2022, renewed at the BNP Paribas SA Mandatory Annual Negotiations in France in 2024 with EUR 10 million to be divided equally over 2025 and 2026.

BNP Paribas remains attentive to its employees through Pulse surveys, with 46 surveys carried out in 62 countries, with increasingly high participation rates within the Group. In 2024, it was a 72% participation rate on average among nearly 173,000 employees surveyed. The vast majority of surveys launched in 2024 by the Group's various business lines and entities incorporated three common questions related to employee engagement, in particular pride in belonging to the Group, adherence to the strategy and involvement in work. The overall engagement score based on the consolidation of all local engagement scores ⁽¹⁾ reached a high level of nearly 85 out of 100 (stable compared to 2023).

The Group also listens to employees through their representatives. Indeed, the Group's desire is to be part of a constructive social dialogue, which goes beyond the organisational levels, from the subsidiaries to the SA, from the Group in France and beyond our borders. These discussions with employee representatives cover key topics such as strategy, results and transformation projects.

The Group invests heavily in the training of its employees, particularly on ESG topics, for which specific monitoring has been put in place. In 2024, 77,270 Group employees attended Sustainability Academy training and specific training on respect for human rights in the conduct of business was rolled out to 1,600 targeted employees. Since its launch at the end of 2022, more than 130,000 Group employees have been trained as part of the Sustainability Academy.

5.2 Suppliers and subcontractors

The number of ESG evaluations of suppliers and subcontractors carried out in a new relationship context is an indicator monitored by BNP Paribas for this category of stakeholders. In 2024, 5,214 ESG evaluations were carried out (compared to 5,312 in 2023).

Another indicator, the number of suppliers belonging to the priority monitoring quadrant (sensitive suppliers list) that have adhered to its sustainable sourcing charter, is also monitored. At the end of 2024, 2,007 suppliers had signed this sustainable sourcing charter (compared to 1,287 at the end of 2023).

These figures concern around 30 Procurement teams located in 25 different countries that contributed to responsible purchasing reporting in 2024.

At BNP Paribas Real Estate in 2024, 81% of suppliers signed the sustainable sourcing charter (compared to 45% in 2022).

5.3 Distribution of financial products and services to individuals

With regard to the broad and continuous system to listen to customers deployed by the Group in 2024, in the four Domestic Markets (France, Belgium, Italy and Luxembourg), 7.3 million e-mail surveys were sent to customers to collect their feedback, with a return rate of 7%. In addition, nearly 850,000 feedback items were collected via live surveys on digital channels (pop-in, pop-up).

With regard to the Group's financial inclusion offers, at the end of 2024:

- in France, 19.7% of customers identified as financially vulnerable by Commercial & Personal Banking in France benefited from its dedicated "Forfait de Compte" offer, which aims to contribute to the improvement of their financial situation with adapted banking services and a cap on a set of costs;
- Nickel has achieved more than 4.3 million accounts opened since its creation, up by more than 706,000 accounts in one year;
- BNP Paribas' direct support for microfinance reached EUR 468.8 million in loans and investments for 22 Microfinance Institutions (MFIs) in 13 countries. At the end of September 2024, this represented nearly 700,000 active beneficiaries (of partner MFIs) indirectly supported by BNP Paribas.

5.4 Financing, investment and advisory activities for corporate clients

At the end of 2024, the system for financing and investment activities for corporate clients as well as the restriction of activity according to the severity of the environmental and social impacts produced the following results:

- ESG Assessment questionnaires were conducted with medium-sized corporate clients (companies with turnover of over EUR 50 million, selected on risk-based criteria) and financial institutions;
- at the end of 2024, the restriction of activity lists included 2,736 companies (compared to 1,718 in 2023), of which 1,753 companies were excluded and 983 monitored;
- in 2024, BNP Paribas Asset Management voted at 2,063 Annual General Meetings, abstaining or opposing around 35% of these resolutions (compared to 36% in 2023), and supporting 85% of shareholder proposals on climate change and 97% of those on social topics. In 2024, BNP Paribas Asset Management opposed 2,294 resolutions proposed by 371 companies, primarily due to environmental or biodiversity-related considerations;
- in 2024, 96% of BNP Paribas Cardif's general assets in euros in France were subject to an ESG analysis.

(1) Covering 90% of all Group employees at 31 December 2024.

With regard to sustainable financing and activities with a positive impact, the results are as follows:

- sustainable loans, for an amount of EUR 133 billion at the end of 2024;
- sustainable bonds, for an amount of EUR 106 billion at the end of 2024, for which BNP Paribas was the world leader at the end of 2024 according to Dealogic;
- assets under management under articles 8 and 9 of the SFDR in BNP Paribas Asset Management's open-ended funds distributed in Europe reached EUR 285 billion at the end of 2024;
- financing for the production of low-carbon, mainly renewable energy: at the end of September 2024, this financing

represented EUR 36.8 billion, of which EUR 34.2 billion for renewable energy sources, *i.e.* 76% of the Group's energy production financing;

- support for impact enterprises (including Microfinance Institutions), which exceeded EUR 2 billion at end-2024, with support for 3,119 impact enterprises.

With regard to the alignment of the credit portfolio, given the relative weighting of each sector in the Group's credit exposure, the average results for end-2024 in the nine business sectors for which the Group has set intermediate targets are in line with BNP Paribas' ambition to finance a carbon neutral economy by 2050 (see section 3.5 *Alignment of the credit and investment portfolios with the net-zero objective in 2050*):

► RESULTS OBSERVED AT THE END OF 2024 CONCERNING THE ALIGNMENT OF BNP PARIBAS' CREDIT PORTFOLIO

Sector	Metric	Reference base [year at 31/12 unless otherwise stated]	Most recent result [year at 31/12]	Target [year at 31/12]
Oil & gas	Exploration-production credit exposure in billions of euros	Oil: 5.0 Gas: 5.3 [Q3 2022]	Oil: 2.1 Gas: 2.7 [2024]	Oil: ≤ 1 (-80%) Gas: ≤ 3.7 (-30%) [2030]
	Financed emissions of the sector (exploration- production and refining) in MtCO ₂ e	27.3 [Q3 2022]	9.5 [2024]	≤ 8.2 (-70%) [2030]
Power generation	gCO ₂ /kWh	208 [2020]	129 [2024]	≤ 146 (-30%) [2025]
	Share of renewable energy in the electricity mix calculated by capacity	57% [2020]	70% [2024]	≥ 66% [2025]
	Share of coal in the electricity mix calculated by capacity	10% [2020]	4% [2024]	≤ 5% [2025]
Automotive	gCO ₂ /km WLTP ⁽¹⁾	183 [2020]	145 [2024]	≤ 137 (-25%) [2025]
	Share of electrified vehicles ⁽²⁾	4% [2020]	16% [2024]	≥ 25% [2025]
Steel	tCO ₂ /t of crude steel	1.6 [2022]	1.5 [2024]	≤ 1.2 (-25%) [2030]
Aluminium	tCO ₂ e/t aluminium	6.2 [2022]	5.3 [2024]	≤ 5.6 (-10%) [2030]
Cement	tCO ₂ /t of cement product	0.67 [2021]	0.63 [2023]	≤ 0.51 (-24%) [2030]
Aviation	gCO ₂ e/RTK ⁽³⁾	956 [2022]	904 [2023]	≤ 785 (-18%) [2030]
Shipping	AER (Annual Efficiency Ratio) in gCO ₂ e/dwt.nm	8.3 [2022]	8.2 [2023]	5.6 - 6.4 (-32 to -23%) [2030]
Commercial Real estate	kgCO ₂ e/m ²	28.4 [2022]	27.7 [2023]	16.7 - 19.5 (-41 to -31%) [2030]
Residential Real estate	kgCO ₂ e/m ²	Group: 35.5 France: 20.2 Belgium: 59.7 Italy: 34.4 [2022]	Group: 35.0 France: 19.7 Belgium: 58.4 Italy: 33.1 [2023]	-

(1) WLTP: Worldwide Harmonised Light Vehicle Test Procedures defined by the United Nations Economic Commission for Europe.

(2) Electrified vehicles: plug-in hybrid vehicles, battery electric vehicles, vehicles equipped with fuel cells.

(3) Revenue Tonne Kilometre.

For more details on the scopes and scenarios used, see the full table “Summary of baselines, emissions and targets in intensity and absolute value of the main sectors emitting the most greenhouse gases” in section 7.1.2 *Climate change* in the Group’s Sustainability reports.

In addition, concerning investments, BNP Paribas Asset Management and BNP Paribas Cardif each analysed the impact of their respective investment portfolios on biodiversity for the third year in 2024 ⁽¹⁾, making it possible to identify engagement targets for the voting team and for the asset managers. Three years after the publication of its first biodiversity roadmap in 2021, BNP Paribas Asset Management published an update of this roadmap in December 2024 ⁽²⁾ which details its progress to date.

5.5 Operational scope

BNP Paribas carries out actions to reduce its direct environmental impacts, with the aim of being consistent with its commitments in its financing and investment activities, setting an example and raising the awareness of its employees.

Thus, BNP Paribas has measured its energy consumption and greenhouse gas emissions within its operational scope (scope 1, scope 2 and scope 3 for business travel) since 2012 and is gradually reducing them by reducing energy consumption for its premises, less energy-consuming IT equipment and supervision of business travel, as well as by developing the use of low-carbon energies.

With regard to 2024, the Group’s greenhouse gas emissions (expressed in tonnes of CO₂ equivalent per full-time equivalent – FTE) amounted to 1.48 teqCO₂ per FTE (compared to 1.56 teqCO₂ per FTE in 2023).

5.6 Interactions with the Group’s external stakeholders

Interactions with our stakeholders are key for the Group. Their number is constantly changing, with in particular:

- 182 interactions with advocacy NGOs in 2024, on topics such as climate, fossil fuels and human rights;
- 87 interactions with investors in 2024, on various topics such as portfolio alignment, ESG risk management, sectoral policies and CSR governance.

5.7 System’s controls

Risk management is central to the banking business and is one of the cornerstones of operations for BNP Paribas. The Group has an internal control system covering all types of risks to which it may be exposed, including environmental and social risks, organised around three complementary lines of defence. The vigilance plan is based on this system, which makes it possible to verify compliance with procedures and the implementation of appropriate measures if necessary.

The operational entities, supported by the Company Engagement, HR and TOP Departments, constitute a first line of defence; they are responsible for their risks and are the primary players in permanent control. The risk management system, which includes ESG risks, is operated by the first line of defence, which forms the first-level control system.

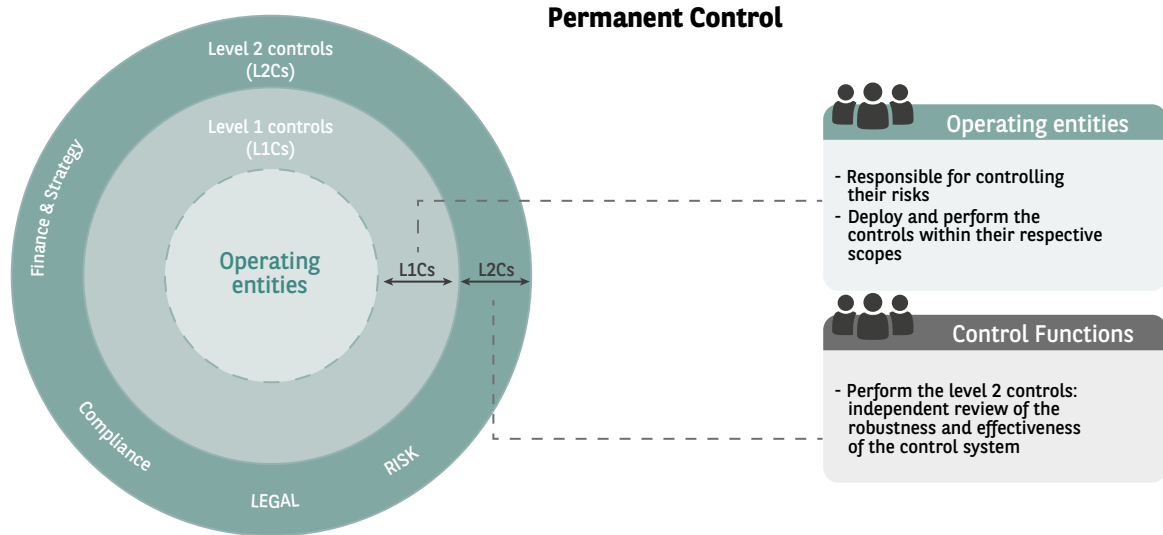
The three integrated functions exercising second-level control (second line of defence) are:

- RISK, responsible for organising and overseeing the overall risk management system (including ESG risks);
- Compliance, responsible for organising and overseeing the non-compliance risk control system;
- LEGAL, responsible for organising and overseeing the legal risk control system.

(1) Cardif Assurance Vie: https://www.bnpparibascardif.com/c/document_library/get_file?uuid=6c1e7eaa-e4d8-002d-d1c5-6ddc6c6c66de&groupId=348001.
Cardif Assurance Retraite: https://www.bnpparibascardif.com/c/document_library/get_file?uuid=1fb5d935-f1d5-85eb-8a6b-83fee0aece39&groupId=348001.
BNP Paribas Asset Management: <https://docfinder.bnpparibas-am.com/api/files/d7877194-bc40-44ed-afa9-57bc17c81a01>.
Real Estate Investment Management: *BNP-Paribas-REIM_ESG-report-2023_VF*INAL-Web.pdf.

(2) <https://docfinder.bnpparibas-am.com/api/files/5a588f17-f044-4b52-bd2c-9d4921b08bad>

The permanent control system is shown below:



General Inspection is the third line of defence: the General Inspection is responsible for periodic control, performs the internal audit function and contributes to the protection of the Group by independently acting as its third line of defence on all Group entities and in all areas, including ESG. A dedicated ESG expertise line oversees the coordination of ESG topics across General Inspection.

In order to verify the strict application of ESG risk management tools, BNP Paribas has rolled out a CSR operational control plan which establishes a continuous improvement process. This control plan, linked to the application of sectoral policies, exclusion and monitoring lists, and questionnaires on the duty of care, is applied to the Group's business lines and functions.

In addition, BNP Paribas' 2024 Sustainability statements are audited with a limited assurance report by the statutory auditors.

OUR COMMITMENT TO CONTINUOUS IMPROVEMENT

BNP Paribas' vigilance approach is part of a drive for continuous improvement. As such, the Group will complete, where necessary, its identification, control and management tools for identified risks, and will report on them each year in its Universal registration document.