

Summary of BNP Paribas Global Anti-Corruption Policy and Framework

The BNP Paribas Group has implemented a global program to prevent and detect corruption and influence peddling (“corruption”)¹. Designed in compliance with the French Sapin II law and in light of the best international practices – such as the French Anticorruption Agency guidelines, the UK Bribery Act and the U.S Foreign Corrupt Practices Act – the Anti-Bribery and Corruption (ABC) program is described in a Global Anti-Corruption Policy and updated in view of corruption risk assessment results.

The ABC program applies to all BNP Paribas entities, and consists of the following measures and policies:

- **The [Group CEO anti-corruption statement](#)** confirming BNP Paribas zero tolerance for corruption and influence peddling. BNP Paribas senior management oversees the deployment of ABC program, notably by validating the Group anti-corruption risk assessment report.
- **A governance**, supervised by a dedicated team at Group level, in charge of the design and the coordination of ABC program and supervision of international ABC correspondents network, present in all Business Lines and Functions of the Group.
- **A corruption risk assessment**: Risks of corruption and influence peddling are assessed on a regular basis, and results are presented to the BNP Paribas Group management body in its executive function for approval, and to the Board of Directors. Risk assessment methodology enables a granular evaluation of corruption risks based on scenarii assessed by the Business Lines and Functions, and their prioritization (through risk factors), as well as action plans to address corruption risks.
- **The [Group Code of Conduct](#)** (available in 20 languages), prefaced by the Group CEO and the Chairman of the Board of Directors, includes an Addendum dedicated to the prevention, detection and fight against corruption and influence peddling, providing illustrations of prohibited situations or that should raise the attention of employees when encountered. Policies associated with the Anti-corruption Addendum to the Group Code of Conduct – on [gifts and invitations](#), lobbying, conflict of interests, philanthropy, partnership, sponsorship and related donations – are also available and provide guidance to employees on how to manage corruption risks in these situations.
- **A [whistleblowing framework](#)**: BNP Paribas employees have access to whistleblowing channels at Group level in different languages to report any breach of the Anti-Corruption Addendum to the Group Code of conduct. A whistleblowing channel has also been opened to external third parties.
- **[Due diligence processes on all BNP Paribas third parties](#)**: Group policies establish due diligence requirements on clients (including on Politically Exposed Persons), intermediaries,

¹ Please note that in the context of corruption and influence peddling, a public official is defined in line with the Wolfsberg ABC Guidance and encompasses as a minimum any person who:

- Occupies or holds an office or public function, in particular elective, political, administrative, judicial or monarchist, in a country, whether appointed or elected (civil servant, local elected representative, candidate for political office, employee or officer of a political party, deputy, judge, etc.) or inherited (royal families);
- Performs a public function for a country, including for a public company, public body, state-owned or state-controlled entity;
- Belongs to a public international organization.

suppliers or other types of third parties. This set up enables the identification and management of counterparts most exposed to the specific risk of corruption (such relationships are subject to specific mitigation measures). Finally, a tool to analyze adverse information related to third parties is deployed throughout the Group, accessible to all employees through the Group intranet.

- **Controls to manage corruption risks:** BNP Paribas control framework is organized around 3 lines of defense, with the business/front responsible for the first line of defense, Functions such as COMPLIANCE, RISK, FINANCE responsible for the second line of defense, and *Inspection Générale* (third line of defense) performing periodic audits including on ABC topics. Controls (including accounting one) to mitigate corruption risks are identified in light of risk mapping scenarii, at Group and local level, and include verifications regarding major ABC related policies and risks. Finally, analysis of incidents associated with corruption, which results are presented to senior management, is performed quarterly at Group level. All together, controls and key indicators enable to monitor ABC program and to address negative results with recommendations or action plan.
- **Training and awareness-raising campaigns:** Mandatory training covering corruption and influence peddling risks is offered to all BNP Paribas employees, who re-take an awareness online session on the topic every 2 years. Employees most exposed to corruption and influence peddling risks follow another specific training tailored to the particularities of their job. As long as they remain in a position considered to be more exposed to corruption risks, they are required to re-take the training every 2 years. A specific anti-corruption certification was introduced to train ABC correspondents in Compliance. Finally, the Board of Directors is also provided with a training session on all Financial Security topics including on the fight against corruption, every two years.
- **Disciplinary regime:** Any suspicion of corruption or influence peddling involving a BNP Paribas employee is investigated and sanctioned if confirmed.

Published on January 2025

Previous versions: November 2017, February 2021