



Summary of BNP Paribas's Global Anti-Corruption Policy and framework (published on 04 February 2021)

The BNP Paribas Global Anti-Corruption policy (**ABC Policy**):

- applies to all entities belonging to BNP Paribas (BNPP)¹,
- states the role of all employees in corruption and influence peddling prevention and detection
- draws in particular on the French Sapin II law on “transparency, the fight against corruption and the modernization of the economy”, the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act,
- establishes the governance of the anti-corruption framework across the BNP Paribas Group, including the ABC Department at Group level, the network of ABC correspondents in Compliance and other Functions and Business Lines across the Group,
- is structured around the pillars of article 17 of the Sapin II law, namely:
 1. **Code of conduct**²: the BNPP Code of Conduct with its ABC addendum embodies the values that guide BNPP employees' actions. It is illustrated with situations and behaviors that are prohibited or should raise the attention of employees. It covers several topics relevant for anti-corruption purposes (including gifts and invitations, lobbying, conflict of interest among others), which are subject to detailed guidance in other internal procedures to BNPP.
 2. **Whistleblowing channel**: BNPP employees have access to whistleblowing channel to raise any breach of the Code of conduct (in French and English at Group level and in their own language in several countries).
 3. **Assessment of corruption risks**: risks of corruption and influence peddling are assessed on a regular basis and results are presented to senior management to ensure proper supervision.
 4. **Third parties due diligence**: BNPP applies due diligence to all its business relationships, whether they are clients, intermediaries, suppliers or other types of partners. Business relationships presenting a higher risk of corruption and influence peddling, for example involving Politically Exposed Persons, are subjected to enhanced scrutiny.
 5. **Accounting controls**: BNPP's accounting controls contribute to managing risks, including the risk of corruption and influence peddling. Specific policy and controls have been

¹ “Group entities”, “the Group”, “BNP Paribas” or “BNPP” mean BNP Paribas SA together with all of its subsidiaries and companies under the control of the parent company located in France, irrespective of the scope of consolidation or their geographical location in France or abroad. This scope stems from the French Sapin II law. The subsidiaries of BNP Paribas SA's are those defined under the provisions of article L. 233-1 of the French commercial code, and the companies it controls under the provisions of article L. 233-3 of the French Code of commerce

² The BNPP Group Code of Conduct can be accessed at https://group.bnpparibas/uploads/file/codeofconduct_en_11_01_2018_40p.pdf



designed for processes and transactions presenting a particular high risk of corruption and influence peddling (such as those related to gifts and invitations).

6. **Training and communication:** Mandatory training covering corruption and influence peddling issues is offered to all BNPP employees. Staff most exposed to corruption and influence peddling risk follows training tailored to the specific needs to their job. BNPP strives to actively discuss the topic internally with involvement of senior managers in communication around corruption and influence peddling prevention, detection.
7. **Internal controls:** BNPP control framework is organized around 3 lines of defense, with the business/front line responsible for the first line controls, the second line performed by functions such as COMPLIANCE, RISK, FINANCE, TAX and LEGAL, and Inspection Générale performing independent controls with a specific methodology dedicated to ABC topics. It is a responsibility of all employees to report incidents related to corruption and influence peddling that they know of through the several reporting channels available. BNPP conducts quarterly analysis of all these incidents to learn from them and improve the ABC framework.
8. **Disciplinary regime:** Any suspicion of corruption or influence peddling involving a BNPP employee is investigated and duly sanctioned if confirmed.

Policy previous versions: 17th November, 2017