

Statement on Modern Slavery and Human Trafficking

UK AND AUSTRALIAN MODERN SLAVERY ACT



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1. INTRODUCTION

This statement is our 2025 Modern Slavery and Human Trafficking Statement, published in accordance with section 54 of the UK Modern Slavery Act 2015 and section 13 of the Australian Modern Slavery Act 2018 (Cth). The MSA statement was approved by the Board of Directors of Crédit Agricole Corporate Investment Bank (Crédit Agricole CIB or Bank) on 27 April 2026.

It describes the steps taken by Crédit Agricole CIB, for the financial year ending 31 December 2025, to assess and address modern slavery and human trafficking risks in its business, operations and supply chains.

Modern slavery can take many forms. It includes forced labour, forced marriage, deceptive recruiting for labour or services, debt bondage, child slavery, human trafficking, and any form of domestic servitude.

Crédit Agricole CIB facilitates training so that employees are equipped to mitigate modern slavery and human rights risks overall. In line with the principles set out in the Group's Code of Ethics, Crédit Agricole's Code of Conduct also stresses that "with regards to relations between Company employees or with all of its stakeholders, human rights and people's fundamental social rights must be rigorously applied".

2. OUR STRUCTURE, BUSINESS, OPERATIONS, AND SUPPLY CHAINS

2.1 Our structure, business and operations

Crédit Agricole CIB is a joint stock limited liability company incorporated in France and is a subsidiary of Crédit Agricole SA. It acts as the corporate and investment banking business of the Crédit Agricole Group and serves approximately 2,050 corporate customers and 1,550 financial institutions.

Crédit Agricole CIB offers its clients a wide range of products and services. It provides support to its clients in key international markets through its global network, operating from more than 35 countries around the world, including major hubs in Europe, the Americas, the Asia-Pacific and the Middle East.

- [For further details on Crédit Agricole CIB activities, please refer to section 1.3. "Crédit Agricole CIB's Business Lines" \(2025 Crédit Agricole CIB Universal Registration Document\).](#)

2.2 Definition of our value chain

Crédit Agricole CIB's value chain is primarily associated with its financing and investment activities, from the design of products and services to their use by end clients, including their marketing and distribution and the management of its own transactions.

- For further details on our value chain, please refer to section "1.3.1.2. Value Chain" (Chapter 2, [2025 Crédit Agricole CIB Universal Registration Document](#)).

The Group has a suite of Group-wide policies and practices which are designed to uphold compliance with labour standards within its business and operations, including the operations of Crédit Agricole CIB and its owned and wholly or jointly controlled entities (on a consolidated basis). These policies and practices are implemented through actions taken at both the Group and business levels. The Group considers that its modern slavery risks reside principally within its upstream supply chains and, indirectly, within its clients' upstream supply chains.

2.2.1. Our suppliers

Crédit Agricole CIB purchases products and services from 7,420 direct suppliers based in 81 countries, mainly in EMEA, the Americas and Asia-Pacific.

In 2025, Crédit Agricole CIB's purchases totalled € 1.4 billion, and the main purchasing and service contracts related to professional services, intellectual services, real estate, IT, banking services, general goods, and telecommunications.

During the reporting period, France, the UK, the United States, Singapore, Belgium, Hong Kong, Italy, Germany, Japan, and Luxembourg were the principal jurisdictions where the direct suppliers of Crédit Agricole CIB and of its owned or controlled entities were based.

2.2.2. Our staff

Crédit Agricole CIB is committed to respecting human rights, facilitating safe and fair working conditions, and promoting equal treatment and non-discrimination for all its staff across all its geographies. Operating in more than 30 countries, Crédit Agricole CIB employed more than 10,700 employees at the end of 2025, with a diverse range of skills and cultural backgrounds who work to support long-term performance and the deployment of responsible practices throughout the value chain.

2.2.3. Our clients

Crédit Agricole CIB has approximately 3,600 institutional and corporate clients worldwide, mainly large corporates, financial institutions, institutional investors, public sector entities and financial sponsors. As referenced in 2.1. above, Crédit Agricole CIB serves its clients in over 35 countries, with strong presence in Europe, the Americas and Asia-Pacific. Certain clients, through their own business or supply chain, may be exposed to industries, e.g. labour-intensive, and geographies, with higher human rights abuse risk including forced labour and human trafficking.

3. ADDRESSING MODERN SLAVERY RISKS IN OUR ORGANISATIONAL POLICIES AND COMMITMENTS

3.1. Our commitments and policies

Building on the strengths of its cooperative and mutualist identity, the Group defined its “raison d’être” as “Acting every day in the interest of our customers and society” in 2019. The Group’s Medium-Term Plan (ACT 2028), in which Crédit Agricole CIB participates, embeds social values in its activities, business lines and processes.

The Group’s strategy and commitments reflect the fundamental principles drawn from:

- The United Nations’ Universal Declaration of Human Rights published in 1948,
- The ten principles of the UN Global Compact (Global Compact) since 2003,
- The Equator Principles since 2003,
- The Principles for Responsible Investment (PRI) since 2006,
- The United Nations Sustainable Development Goals since 2015,
- The UN Guiding Principles on Business and Human Rights approved by the Human Rights Council in 2011,
- The OECD Guidelines for Multinational Enterprises,
- The International Labour Organization conventions and the performance standards of Société Financière Internationale (SFI),
- The Principles of Responsible Banking (PRB) 2019.

In addition, by signing the UNI Global Union Global Agreement, Crédit Agricole SA has reaffirmed its commitment to respecting all laws on employment, freedom of association, collective bargaining agreements, health and safety regulations at national level, as well as internationally recognised human rights and applicable laws, in all the markets where it operates.

Policies formalising the principles of professional, social and environmental ethics – including those related to human rights - implemented by Crédit Agricole CIB at all levels include:

- The Responsible Procurement Policy and the [Responsible Purchasing Charter](#) are based on reciprocal commitments between Crédit Agricole Group entities and their suppliers reflecting the fundamental principles of the United Nations Global Compact. Crédit Agricole SA and its subsidiaries, including Crédit Agricole CIB, renewed the Supplier Relations and Responsible Procurement Label in April 2024. It identifies the companies that have provided proof of sustainable and balanced relationships with their suppliers.¹
- The Crédit Agricole Group’s Code of Ethics, issued in May 2017 and updated in 2025, sets out the Group’s guidelines for action and behaviour in line with the applicable

¹ This is issued by the Business Mediator of the French Ministry of Economy and the French National Procurement Council (CNA) on the basis of an assessment and documentary audit carried out by an approved firm (ASEA).

international agreements and conventions on human rights, the prevention of forced labour and child labour, and the fight against bribery and corruption.

- The principles of the Group Code of Ethics are defined in each entity via the Code of Conduct.² Crédit Agricole CIB's Code of Conduct,³ last updated in December 2023, is a guide on ethical conduct, i.e. respecting individuals and human rights - and it applies to everyone – be they internal or external. It will be updated by the end of 2026.
 - Regarding the Group's financing activities, the Corporate Social Responsibility (CSR) sector policies set forth the social and environmental criteria that apply to lending and investment activities and which include respect for human rights. For each sector covered, a reference framework is determined, and the criteria for analysing transactions are defined, as well as exclusion criteria for the projects and the operations the Group does not wish to support.
- For further details on the Bank's policies, please refer to section "3.1.1.1. The human project, a major lever" ([2025 Crédit Agricole CIB Universal Registration Document](#)).

3.2. Whistleblowing

Crédit Agricole CIB introduced a whistleblowing mechanism via the BKMS platform set up by the Group in all its entities in France and abroad in 2019. All types of issues can be reported, anonymously or not, via this tool, including those falling within the scope of the Group's Vigilance Plan.

An acknowledgement of receipt is sent for all alerts received to confirm the receipt of the report, specify that the admissibility of allegations made will be considered, and explain that the whistleblower can provide additional information (be they anonymous or not) via the tool. An assessment of the admissibility of allegations is completed within a reasonable period and confirmation on whether the person making the alert has the status of a "whistleblower", as per the French Wasserman law,⁴ will be provided (where applicable). Within three months of the acknowledgment of receipt, additional information is provided on whether (i) an investigation will be carried out into the allegations made; (ii) remedial actions (if appropriate) that have been taken or are planned; (iii) whether the investigation has been completed and the alert can be closed. Where appropriate, external lawyers can be instructed.

This system, which has been developed in consultation with trade unions, is accessible to all staff members of the Group, contractors and temporary employees, suppliers and subcontractors with whom the Group has established commercial relations. It is available in

² The Group Code of Ethics, The Codes of conduct of the Group's entities and the Fides Corpus. N.d. available at: [Culture, compliance and ethics | Crédit Agricole](#)

³ Compliance Rules. Crédit Agricole CIB Code of Conduct. 2023. Available at: [Code de conduite EN CACIB IQ0241 V7 0.pdf](#)

⁴ Wasserman law or Law n°2022-401 of March 21st, 2022 aiming to improve whistleblowers' protection. Available at: [LOI n° 2022-401 du 21 mars 2022 visant à améliorer la protection des lanceurs d'alerte \(1\) - Légifrance](#)

nine languages and helps ensure that the Group operates in accordance with its ethical values.

The BKMS platform is secure and accessible at all times via an [independent link](#).

- For further information, please refer to “3.1.2.4. Work environment (*Commitment to tackle inappropriate behaviour and all forms of violence*)” (Chapter 2, [2025 Crédit Agricole CIB Universal Registration Document](#)) and “5.4.1. Whistleblowing policy” (Vigilance Plan, [2025 Crédit Agricole SA Universal Registration Document](#)).

4. ASSESSING AND ADDRESSING MODERN SLAVERY RISKS

Crédit Agricole CIB’s commitments and policies are complemented by a framework for the management of risks relating to modern slavery and human trafficking in its activities and relations with suppliers.

The framework consists of internal policies, procedures and action plans that include prevention, identification, assessment and risk mitigation measures. This framework is based on a risk-based approach to promote the effectiveness and to contribute to the continuous improvement of risk prevention and mitigation measures. The approach depends on the parties and activities relevant for Crédit Agricole CIB and concerns relations across client base and supply chain.

This framework is developed in accordance with the Vigilance Plan of the Crédit Agricole Group as required by the French Duty of Vigilance law of 27 March 2017. The latest version of the [Crédit Agricole SA Vigilance Plan](#) can be found in the [2025 Crédit Agricole SA Universal Registration Document](#).

4.1. Addressing modern slavery risks within our upstream value chain

4.1.1. Due diligence and risk assessment of suppliers

The Group Procurement Department has continued to enhance its procedures for assessing supplier risk and supplier compliance, and to reinforce the Know Your Supplier (KYS) procedure applied to the scoring, screening and selection of suppliers. In 2025, the Group Procurement Department updated its procurement risk mapping by identifying, analysing and prioritising procurement categories that present heightened risks based on environmental, social, human rights and ethical criteria, including labour-related risks. This ESG-based analysis, as updated in 2025, identified five procurement categories as being of higher risk: real estate works, IT equipment and telecom equipment, advertising materials, with two new categories of (i) vehicles and (ii) fluids and energy. These categories were prioritised for enhanced due diligence, and action plans aimed at mitigating procurement-related risks were implemented accordingly.

A supplier CSR assessment is systematically integrated into requests for proposals and forms a material component of the supplier evaluation process, accounting for 20% of the overall rating. For procurement categories identified as higher risk based on ESG criteria (real estate works, IT and telecom equipment, advertising materials, vehicles, fluids and

energy), the weighting of the CSR assessment is increased to 30%, reflecting the heightened level of risk and the need for increased scrutiny.

The CSR criteria, which the Group aims to apply consistently across all substantive purchasing activities, are structured around four areas: (i) the assessment of the supplier by an independent third party, where available; (ii) evaluation criteria relating to the supplier's approach to inclusion and respect for fundamental social standards; (iii) evaluation criteria relating to the supplier's approach to decarbonisation and environmental management; and (iv) specific criteria applicable to the relevant purchasing category, taking into account identified sector-specific risks.

The methodology used to assess the CSR score is reviewed on a regular basis to promote continued alignment with recognised industry best practices. The purpose of the CSR assessment is to consider both the robustness of the supplier's own CSR policies and their consistency with the CSR standards and expectations of the Group. Since 2012, independent and external CSR information sources, such as EcoVadis, have been taken into account when assessing suppliers' CSR policies, alongside technical and category-specific criteria derived from the procurement risk mapping. The resulting CSR score is taken into consideration when selecting suppliers, goods or services.

The analysis of CSR-related procurement risks is based on three complementary approaches: an assessment of risks inherent to each procurement category, an assessment of supplier-specific risks, and an analysis of geographic risks, including country-level risks that may adversely impact the overall assessment.

Crédit Agricole CIB's Global Sourcing and Procurement Department reports its analysis of financial, ethical, environmental and social risks to its Crédit Agricole CIB Supplier Risk Committee. This Management Committee is held on a semi-annual basis, ensuring appropriate oversight and governance of supplier-related risks.

As part of the tendering process, the Bank requires suppliers to acknowledge and adhere to its values, as set out in the Responsible Purchasing Charter. The Charter defines the reciprocal commitments of Crédit Agricole CIB and its suppliers and is based on the fundamental principles of the United Nations Global Compact. It was signed by the Chief Executive Officer of Crédit Agricole CIB, demonstrating senior management's commitment, and is embedded within the Bank's procurement procedures.

Furthermore, Crédit Agricole CIB's supplier contract templates include a specific clause on "Respect for human rights, protection of the environment and the prevention of corruption". Under this clause, suppliers represent and warrant that they and their supply chains identify and manage relevant risks, respect human rights and fundamental freedoms, ensure the health and safety of individuals, and protect the environment, in accordance with applicable laws and regulations relating to human, social and environmental rights. This clause expressly refers to the UK Modern Slavery Act 2015.

- [For further details, please refer to "5.3.2 In supplier relations" \(Vigilance Plan, 2025 Crédit Agricole SA Universal Registration Document\)](#).

4.1.2. Managing modern slavery risks among our suppliers and subcontractors

To detect and mitigate the risks of modern slavery and human trafficking within or in connection with its supply chain, Crédit Agricole CIB applies procedures to:

- Identify and assess the most risk-exposed sectors of our supply chain;
- Monitor these higher-risk sectors in our supply chain; and
- Mitigate the modern slavery risks within our processes and supply chains.

Key components of the Bank's risk management framework include carrying out diligence on suppliers, carrying out a risk assessment and ensuring governance which reviews high-risk suppliers by the Bank's Senior Management.

Crédit Agricole CIB's Global Sourcing and Procurement department receives continuous training on dealing with the ongoing changes related to their business activities through a comprehensive training programme on CSR issues and supplier risks.

- For further information, please refer to "4.2.3.3. Improving the quality of relations with suppliers over the long term"; "4.2.3.4. Integrating environmental and societal aspects into purchasing" and "4.2.3.5. Taking action for a transition to a low-carbon economy via the purchasing policy" (Chapter 2, [2025 Crédit Agricole CIB Universal Registration Document](#)).

4.2. Addressing modern slavery risks within our staff

4.2.1. Crédit Agricole CIB staff feedback

Crédit Agricole SA, including Crédit Agricole CIB, assesses and gathers feedback relating to employee engagement and satisfaction on several factors including working conditions, managerial cultural transformation and employee wellbeing through the annual Trust Index (formerly Accountability Index - IMR survey). Feedback is gathered anonymously, and the data is shared throughout the Bank for discussion and to identify remedial actions to ensure continuous improvement.

- For further information, please refer to "3.1.1.4. The Crédit Agricole CIB Group employees" and "3.1.2.4. Work environment" (Chapter 2, [2025 Crédit Agricole CIB Universal Registration Document](#)).

4.2.2. Managing modern slavery risks among our staff

Crédit Agricole CIB's Human Resources, Legal, Risk and Compliance functions work jointly to promote a safe, healthy and respectful working environment for all employees. They also play an active role in the social protection of all employees, particularly regarding the health, retirement, inability, disability and death in service, and to promote the safety of its employees.

Crédit Agricole CIB is committed to treating its employees fairly and equitably, as well as enabling them to escalate issues, and deliver training to promote a culture of professional and appropriate behaviour.

Crédit Agricole CIB's diversity policy addresses all forms of diversity including gender, age, disability, sexual orientation, ethnicity, and socio-cultural backgrounds through initiatives implemented across Crédit Agricole CIB and its entities in France and internationally. The policy is built on commitments to equal opportunity by providing all employees equal access to positions and promotions based on skills and performance, openness and curiosity by fostering interest in others and embracing differences, representativeness by reflecting clients and society across all organisational levels, and solidarity by placing mutual support and collaboration at the heart of policies through internal and external initiatives.

An environment of support and collaboration helps the Bank identify modern slavery risks within its operations and directly engage with its workforce to better understand and address those risks. Through its human resources representatives and the Human Resources Division of Crédit Agricole SA, Crédit Agricole CIB maintains dialogue with employee representatives and other labour relations stakeholders, taking into account the Group's extensive presence across Europe. In France, employee representatives and senior management meet within the dedicated Group Committee to discuss the Group's strategy and its economic and social situation.

In addition, the Group's Code of Ethics and Crédit Agricole CIB's Code of Conduct set out the standards of behaviour expected of all employees. The Code of Conduct emphasises strict compliance with human rights and people's fundamental social rights in interactions with colleagues and external stakeholders alike. The Code of Conduct insists on the need of reasonable due diligence to ensure that all actors in the procurement process act in accordance with these commitments and principles. Crédit Agricole CIB is also subject to a comprehensive framework of compliance policies and procedures (Corpus Fides), regularly updated by Crédit Agricole SA, which contributes to the prevention and management of non-compliance risks, including risks related to human rights and labour practices.

4.3. Addressing modern slavery risks within our clients

4.3.1. Clients' due diligence and risk assessment as part of Know Your Customer (KYC) process

In the UK and Australia, slavery is a predicate offence to money laundering and, therefore, is addressed through Crédit Agricole CIB's anti-financial crime and broader compliance and risk management framework. In these jurisdictions, due diligence and risk assessment on clients, monitoring of transactions and governance form part of the Bank's non-compliance risk management system. This framework includes client due diligence and the assessment of clients' risk profiles, transactions and adverse news.

Due diligence is undertaken at the stage of onboarding and during the course of the relationship, including at transactional level, following a risk-based approach. This means that due diligence aims to cover, as relevant and depending on the risk, the risk in the clients' industry, geography and business practices.

4.3.2. Clients' due diligence and risk assessment as part of the credit granting process

Additionally, a CSR score is attributed to every client going through the credit granting process, with a specific focus on environmental and social issues. In situations of heightened risk, clients are the subject of enhanced due diligence and governance. Clients' management of risk and remediation of issues is assessed, for instance, through a review of their modern slavery statement, Code of Conduct, relevant policies, media and other sources, as part of the Bank's credit decision process. Where deemed necessary, the Bank seeks to obtain further information from clients.

Once the due diligence is performed and if the client is considered to be of higher potential risk, the CERES Committee, which is chaired by the head of the Compliance function, acts as the top Committee of the Bank for assessing and managing environmental and social (E&S) risks associated with Crédit Agricole CIB's activities, including risk of human rights abuses. This Committee issues recommendations prior to the Credit Committee, which is chaired by Crédit Agricole CB General Management, for all transactions and clients whose environmental or social impact needs close monitoring.

- For further details on CERES and risk management system regarding ESG issues, please refer to "2.3.6. Risk management, action plans and continuous improvement approach" (Chapter 2, [2025 Crédit Agricole CIB Universal Registration Document](#)).

Relevant staff are trained to identify and mitigate financial crime risks. For example, in addition to mandatory compliance training, Crédit Agricole CIB UK continuously raises awareness about modern slavery risk, including through training and communications. External specialists, such as an anti-human trafficking campaign coalition Stop the Traffik, may be a point of reference for impactful awareness raising and risk management.

5. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

Crédit Agricole CIB's overall approach is part of a continuous and holistic improvement process, the main components of which are:

- Adapting the non-financial risk identification and management tools by continuously updating its risk maps and using these maps and respective risk and performance indicators for better informed strategy and decision making;
- The continued deployment of targeted action plans to reduce the CSR risks of suppliers in the procurement categories identified as 'high risk' and 'very high risk';
- The review of high-risk suppliers during biannual Supplier Risk Committee;
- The purchasing risk division within Global Sourcing and Procurement Department, which is dedicated to risks, compliance and permanent controls aim to prevent and manage the various risks to which purchasing activities are exposed, both by avoiding potential negative impacts for suppliers, and also by reviewing and monitoring the working methods for compliance with regulatory requirements, and seeking to involve our suppliers in our efforts by regularly informing them of our responsible procurement commitments and strategy.

- For further information at the Group level, please refer to “5.5. System for monitoring the actions implemented and evaluating their performance” (Vigilance Plan, [2025 Crédit Agricole SA Universal Registration Document](#)) and to “4.2.3.4. Integrating environmental and societal aspects into purchasing” (Chapter 2, [2025 Crédit Agricole CIB Universal Registration Document](#)).

6. PROCESS OF CONSULTATION & GOVERNANCE

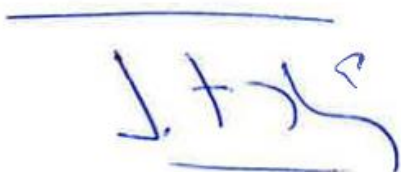
As part of our continuous monitoring of the framework, a cross-functional working group of Crédit Agricole CIB prepared and updated this Statement. Members of Crédit Agricole CIB management, with operational responsibility for entities owned or controlled by the Bank, were engaged prior to presenting the Statement to the Board for final review and approval.

The Statement was approved by the Board of Crédit Agricole CIB on 27 April 2026 and signed by the Crédit Agricole CIB Chairman and Chief Executive.

Montrouge, 27 April 2026



Olivier Gavalda
Chairman of the Board of Directors of Crédit Agricole CIB



Jean-François Balaÿ
Chief Executive Officer of Crédit Agricole CIB

