ENVIRONMENTAL AND SOCIAL GENERAL GUIDELINES FOR BUSINESS ENGAGEMENT

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1. INTRODUCTION

Societe Generale, (the “Bank”) considers that the banking and financial sector is an essential contributor to the economic development. Fully aware of its role in assisting the economic sphere, Societe Generale is also committed to conducting its activities in a responsible way. Taking into account the economic, environmental and social consequences and impacts of its activities is a major focus of the Bank’s sustainable development policy.

Based on continuous improvement, sustainable development as interpreted by Societe Generale draws on best practices of the banking and financial institutions, but also of the other economic sectors. The objective of the Bank is to better understand, manage and improve its impacts on society and the environment, in conjunction with its stakeholders.

Therefore, Societe Generale has established the Environmental and Social (E&S) General Guidelines which are in line with the Bank’s previous commitments. The E&S General Principles stem from the legal and regulatory framework applicable to the Bank’s activities, as well as from the voluntary initiatives it has joined. They are implemented through processes and procedures adapted to the different activities of the Bank.

The E&S General Guidelines outline the key standards and parameters enabling a responsible engagement of Societe Generale in all its activities. They may evolve in time, according to legislative or regulatory evolutions and as a result of the discussions between the Bank and its various stakeholders.

2. SCOPE

These guidelines apply to all the banking and financial services provided by the Societe Generale group entities.

3. STANDARDS AND INITIATIVES

Societe Generale complies with the E&S laws and regulations in force in the countries in which it operates and with the applicable international E&S conventions and agreements.

Societe Generale also adopts and respects the values and principles enshrined in the following international conventions and agreements:

- the Universal Declaration of Human Rights and associated covenants (namely, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights);
- the main Conventions of the International Labour Organization;
- the UNESCO Convention concerning the Protection of the World Cultural and Natural Heritage;
- the OECD Guidelines for Multinational Enterprises.

Moreover, Societe Generale has adopted and supports the following voluntary best practice initiatives:

- the UNEP Finance Initiative;
- the UN Global Compact;
- the Equator Principles.
Legal and regulatory obligations and adoption of the above standards and initiatives entail that Société Générale does not knowingly finance transactions linked to certain goods and services defined in Appendix.

4. CROSS-SECTORIAL POLICIES AND SECTORIAL POLICIES

The Cross-sectorial Policies and Sectorial Policies define the specific standards Société Générale applies to E&S issues common to many sectors (such as biodiversity), and to sectors considered as sensitive from an E&S point of view (such as Oil and Gas, Mining, etc.). They are based on the best international practices.

5. INFORMATION

Société Générale E&S General Guidelines, as well as Cross-sectorial and Sectorial Policies, are available on Société Générale’s website.

6. IMPLEMENTATION PROCESS

Société Générale integrates the assessment of potential E&S risks and impacts into its decision-making processes both at the client assessment level and, where necessary, at the transaction assessment level.

Development of such processes will take into consideration risks materiality and may be adapted to countries.

Société Générale decisions are based on the information made available to the Bank. Société Générale puts all its reasonable endeavors in seeking to ensure the quality and reliability of this information.

a. Client assessment and information

Société Générale commits to providing its clients with all relevant information related to these E&S General Guidelines, as well as to Cross-sectorial and Sectorial Policies applicable to their activities. The Bank only engages with clients who meet or aim at meeting its sustainability standards.

Central to the Bank’s assessment of E&S risks are the understanding of the E&S impacts associated with the client’s activities, and the evaluation of the client’s commitment, capacity and track record in managing these impacts. The Bank’s expectation is that the client should aim at avoiding – or at least reducing, mitigating or compensating for – negative E&S impacts, and at engaging with local communities about matters that directly and materially affect them.

b. Dedicated transaction assessment

In addition to the client assessment process, transactions are subject to a specific E&S assessment when the potential E&S impacts are considered significant, and when it is possible.

Société Générale applies the Equator Principles and its underlying standards to the transactions falling in the scope of this initiative.

For other types of dedicated transactions (known use of proceeds), Société Générale implements E&S assessment procedures adapted to its leverage. For these transactions, Société Générale conducts an E&S due diligence based on a framework consistent with the supported standards and adapted to each type of financial engagement.
7. SCHEDULE – REVISIONS

Societe Generale E&S General Guidelines and Policies are applicable from the date of their publication to all services provided therefrom. Procedures will be put in place progressively, as necessary, throughout the Bank to ensure full integration of these requirements in the usual decision processes. Review mechanisms will allow for continuous improvement.

Societe Generale reserves the right to modify these E&S General Guidelines and attached Cross-sectorial and Sectorial Policies at any time. These documents cannot be interpreted as contractual commitments.

Updated versions will be issued on Societe Generale’s website.

This document is a free translation into English of the original Policy drafted in French.

APPENDIX: EXCLUSION LIST

Societe Generale will not knowingly finance transactions related to the following products or activities which are banned by international conventions and agreements:

- cluster bombs and anti-personnel mines;
- production, use or trade of unbounded asbestos fibres and asbestos-containing products, excluding asbestos cement sheeting where asbestos content is less than 20 per cent;
- production or trade in products containing PCBs (polychlorinated biphenyls);
- production, distribution, sale and trade in pesticides, herbicides, pharmaceuticals and other hazardous substances subject to international bans;
- production, use or trade in chlorofluorocarbons (CFCs) and other ozone depleting substances which have been banned following the calling of an international phase-out;
- trade in wildlife or wildlife products regulated under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES);
- drift net fishing in the marine environment using nets in excess of 2.5 km in length.