The Chief Executive Officer

Modern Slavery Act 2015:
Societe Generale’s Slavery and Human Trafficking Statement

MESSAGE FROM FRÉDÉRIC OUDÉA, CHIEF EXECUTIVE OFFICER:

“For Societe Generale, being a responsible company lies at the very heart of our business lines’ mission and reflects the essence of the relationship bank of reference that we strive to be. Being responsible must be tangible in each of our decisions, positions and actions. As a key player in financing the economy, our mission is to offer the best solutions to individuals, companies and institutions, in order to support them in the development of their projects, the management of their financial resources and the mitigation of their risks. Our success in doing so relies on women and men, whether they are employees, contractors or any other stakeholders. Therefore, respecting human rights and dignity is at the very core of our mission. This is why we are committed to improving our practices to protect human rights\(^\text{1}\) and avoid any violation within our sphere of influence.”

OUR GROUP

Societe Generale is one of the leading financial services groups in Europe. With a solid position in Europe and a presence in countries with strong potential, the Group’s 145,700 employees in 66 countries support 31 million individual clients, large corporates and institutional investors worldwide. The Group has a global net banking income (excluding revaluation of own financial liabilities) of EUR 25.0bn (end of 2015 data). The Group relies on three complementary core businesses:

- French Retail Banking;
- International Retail Banking, Insurance, and Financial Services to Corporates;
- Corporate and Investment Banking, Private Banking, Asset Management and Securities Services.

OUR SUPPLY CHAINS

In 2016, the Group reported a total of 6.6 billion Euros in spending. The main spend categories are IT (software and services), consulting, facilities management, real estate, transport and travel. The Group works with large international groups and SMEs to fill our various purchasing needs in the countries in which we are present.

COMMITMENTS

The Societe Generale Group is committed to maintaining and improving its systems and processes to ensure respect of human rights in the Group’s own operations including human resources management, its supply chain, and its products and services. Societe Generale’s commitments towards human rights in the value chain are guided by the following standards and initiatives:

- The Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights;

\(^{1}\) In this document, the term “human rights violations” is used to encompass all forms of slavery and human trafficking, including forced labour, child labour, domestic servitude, workplace abuse and human trafficking.

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- The Fundamental Conventions of the International Labour Organisation (ILO), which cover, in particular, issues related to forced labour, child labour, discrimination and freedom of association;
- The United Nations Guiding Principles on Business and Human Rights;
- The OECD Guidelines for Multinational Enterprises;
- The United Nations Global Compact;
- The Equator Principles.

**POLICIES AND PROCESSES**

Societe Generale is committed to act with integrity in all its business activities and to comply with all applicable laws. A number of our policies contain provisions which are aimed directly at ensuring there are no human rights violations in any part of our activities.

Societe Generale’s relevant Group-wide policies include, but are not limited to, the following:

- The **Code of Conduct** in which Societe Generale commits to respect human rights (including those relating to slavery and human trafficking) and to comply with the rules established by the ILO;
- The **Worldwide agreement on fundamental human rights and trade union rights signed between Societe Generale and UNI Global Union**, Our commitments include in particular ensuring fair working conditions, preventing any form of employment-related discrimination, respecting all health and safety regulations and freedom of association;
- The **Instruction on Conducting Responsible Sourcing & Compliance Rules Applicable to Sourcing** *(appended to the UNI Global agreement)*;
- The **Instruction on Fight Against Money Laundering and Terrorist Financing Within the Societe Generale Group** *(internal document)*;
- The **Anti-Bribery and Corruption Policy** *(internal document)*;
- The **Environmental and Social Guidelines for Business Engagement**.

Societe Generale’s relevant processes or systems in place or in progress include, but are not limited to, the following:

**Vis a vis our employees**

- Protection of whistle blowers: each Group employee has access to the whistle-blowing process to report or raise any concerns, warnings or suspected unethical or corrupt behaviour. For suppliers or employees of suppliers, a specific providers’ contact form is available on the website of the Group.
- Group-wide disciplinary principles have been defined in 2015 and transmitted to all Directors of Human Resources within the Group.
- The worldwide agreement on fundamental human rights and trade union rights signed with UNI Global Union sets out the following procedures:
  - a regular monitoring of the agreement conducted by UNI: continuous feedback on the local social climate at an international level, alert in case of a breach, yearly meeting between UNI and Societe Generale’s Human Resources;
  - a grievance mechanism established for complaints about the agreement.

**Vis a vis our suppliers**

At the date of this statement, Societe Generale’s internal processes principally address spending managed from France and include:

- The identification and assessment of potential risk areas in our supply chains using our **map of the environmental and social risks of the products and services**
- The monitoring of potential risk areas in our supply chain using:
- the Know Your Supplier (KYS) process launched in July 2016;
- progressive introduction of mandatory environmental and social criteria in our Request for proposal;
- extra-financial evaluation of suppliers.

- The mitigation of the risk of human rights violations occurring in our supply chains (within the KYS process): the bank commits to take steps to rectify any situation where it has identified or been made aware of the fact that it has been or could be associated with human rights violations.

Vis a vis our clients

The Société Générale Group’s environmental and social (E&S) obligations and voluntary commitments for business, including the human rights dimension, are set out in our Environmental and Social Guidelines and the sector and cross-sector policies appended to them, which are public documents.

Société Générale has adopted due diligence procedures to implement its E&S commitments. These procedures include:

- identification of the E&S challenges associated with transactions and customers to whom the bank provides banking and financial services;
- further in-depth evaluation of the identified transactions and customers by in-house expert teams to assess consistency with the Group’s E&S policies; and
- where relevant, action for remediation.

These E&S procedures are being gradually incorporated within both our credit risk and reputational risk management policies and procedures to ensure broad coverage of the Group’s activities.

SUPPLIER ADHERENCE TO OUR VALUES

As outlined in our Group Code of Conduct, Société Générale expects its suppliers and service providers to adhere to principles equivalent to those in such Code of Conduct, including respect for human rights and compliance with all applicable laws.

FURTHER STEPS

Following a review of the effectiveness of the steps we have taken in 2016 to ensure that there are no human rights violations in our supply chains or business activities, we now intend:

- to publish a Group Human Rights Policy;
- to pursue the roll out of human rights related processes worldwide;
- to develop further training and awareness raising on human rights, in order to ensure a high level of understanding of the risks of human rights violations including modern slavery and human trafficking in our supply chains and our business.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group’s slavery and human trafficking statement for the financial year ending 2016.2

On 23rd January, 2017

Frédéric Oudéa
Société Générale
Chief Executive Officer

2 The financial figures mentioned in the letter are at the end 2015, the ones at end of 2016 will be made available later on Societe Generale’s web site and reference document.