

Societe Generale

Statement on Human Rights



TABLE OF CONTENTS

1. INTRODUCTION	3
2. GENERAL APPROACH OF THE GROUP IN RELATION TO HUMAN RIGHTS.....	3
2.1 Regulations, international standards and initiatives in relation to human rights.....	3
2.2 Governance in relation to human rights.....	4
3. FRAMEWORK FOR RESPECTING HUMAN RIGHTS IN THE GROUP'S RELATIONSHIPS WITH ITS EMPLOYEES, SUPPLIERS AND CLIENTS.....	5
3.1 The Group's employees.....	5
3.2 The Group's suppliers and subcontractors.....	5
3.3 The Group's activities.....	6
4. HUMAN RIGHTS AND THE GROUP'S STAKEHOLDERS	7
4.1 Dialogue with stakeholders.....	7
4.2 Whistleblowing set up.....	7

1. INTRODUCTION

Human rights are internationally recognized and defined by the Universal Declaration of Human Rights of December 10, 1948; the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights of December 16, 1966. They find their translation for labor issues in International Labor Organization Declaration on Fundamental Principles and Rights at Work and the Fundamental Conventions of the International Labor Organization. Human rights are protected in Europe by the European Convention on Human Rights of November 4, 1950.

This document describes the approach of Societe Generale and all consolidated companies over which it exercises exclusive control (together the Group) in relation to the respect of human rights.

2. GENERAL APPROACH OF THE GROUP IN RELATION TO HUMAN RIGHTS

Although states bear a primary responsibility for the promotion and protection of human rights within their territory and/or jurisdiction, the Group recognizes that companies have a role to play in acting diligently to prevent human rights' abuses. **The respect of human rights is part of the Group's corporate responsibility** towards its employees, in its relationships with its suppliers and within its activities. The Group has enshrined the respect and protection of human rights in its Code of Conduct.

2.1 Regulations, international standards and initiatives in relation to human rights

The Group is committed to complying with the human rights legal and regulatory requirements in the territories in which it operates.

In addition, the following major international guidelines and conventions serve as a reference for the Group's approach to human rights:

- The OECD Guidelines for Multinational Enterprises;
- The United Nations Guiding Principles on Business and Human Rights (UNGPs) of June 16, 2011, and the associated "Protect, Respect and Remedy" framework;
- The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP); and
- The United Nations Sustainable Development Goals (SDGs).

The Group also supports international initiatives aiming to clarify the role of companies, especially from the banking sector, in respecting and promoting human rights:

- As a signatory of the United Nations Global Compact (UNGC) since 2003, the Group supports the ten UNGC fundamental principles, including Principles 1 to 6 related to Human Rights and Labour.
- Societe Generale endorsed in 2007 the Equator Principles (EPs), which is a common risk management framework adopted by financial institutions, for determining, assessing and managing Environmental and Social (E&S) risks attached to large-scale projects. Societe Generale is committed to implementing the

Equator Principles in its internal E&S policies, procedures and standards. This includes applying specific requirements for clients' human rights diligence in line with the UNGPs as introduced in the 2020 EP4.

In compliance with the French Law No. 2017-399 of March 27, 2017 on the "Duty of Care of Parent Companies and Ordering Companies", **the Group implements a Duty of Care Plan aiming at identifying, preventing, or mitigating serious breaches, in relation to human rights**, fundamental freedoms, health, safety and security of persons and the environment. This plan and the report on its implementation and notably the risks of violations of human rights that are inherent to its activities (referred to as "inherent E&S risks"), are presented in the annual Universal Registration Document of Societe Generale.

Pursuant to United Kingdom Modern Slavery Act of 2015 and the Australian Modern Slavery Act of 2018, **the Group publishes on its website an annual Statement on Modern slavery and human trafficking**, highlighting the main actions implemented to prevent their occurrence.

The Group participates in forums and sector initiatives (such as Entreprises pour les Droits de l'Homme (EDH) or the Community of Practice of UNEP-FI) to promote the respect of human rights and to deepen the understanding of the issues that arise for the financial sector in that area.

2.2 Governance in relation to human rights

The respect of human rights is part of the Group's CSR ambition. The governance of the Group in relation to human rights is part of the CSR governance of the Group:

2.2.1 At General Management level

- The Group Responsible Commitments Committee (CORESP) validates the Group's CSR commitments and normative framework, including this statement. It is chaired by the Deputy Chief Executive Officer and is mainly made up of the members of the Group Executive Committee (heads of the Compliance and Risk Departments, the Communications Department, the Group Sustainable Development Department) and the heads of the Business Units and Services Units concerned, depending on the subjects dealt with.
- The Deputy Chief Executive Officer is directly responsible for overseeing all CSR policies and their effective integration into the strategic trajectories adopted by the Group's Business Units and Service Units.
- The Group's General Management proposes the CSR strategy to the Board of Directors.

2.2.2 At the level of the Board of Directors

- The Board of Directors approves the CSR strategy proposed by the Group's General Management. It oversees its implementation and reviews it at least once a year. Moreover, since 2022, the Board of Directors is assisted by a non-voting Director who reviews and challenges proposals from the General Management regarding ESG topics.
- Throughout the year, the Board of Directors is assisted by four specialised committees which prepare for the review CSR matters within their respective areas of responsibility. Each matter examined by a committee is subsequently presented to the Board of Directors for discussion and approval, where appropriate.

2.2.3 At other levels within the Group

- The Group Sustainable Development Department, which reports to General Management (Deputy CEO), centralizes and coordinates the E&S framework evolution needs.
- Risk and Compliance Departments are acting as the second line of defense on E&S risks.
- Business Units implement the E&S risk management framework and appoint dedicated E&S expert teams if necessary.

3. FRAMEWORK FOR RESPECTING HUMAN RIGHTS IN THE GROUP'S RELATIONSHIPS WITH ITS EMPLOYEES, SUPPLIERS AND CLIENTS

Human rights impacts may be tied to the employees of the Group, to its suppliers, or to its activities. The Group's commitment to respect human rights applies to each of these three areas with appropriate due diligence processes.

3.1 The Group's employees

The Group Human Resources Department considers the local context for the analysis of the inherent E&S risks related to its employees and in the resulting prevention and mitigating measures. The Group assesses exposure to risks of serious violations of human rights, in all its host countries across the world to identify where and how operations are at risk and gain deeper insights into local issues.

Within the following identified areas, the Group has put in place normative documentation, code of conduct, policies and promotion mechanisms, employees' satisfaction survey (annual) and a mapping of inherent E&S risks based on five themes:

- Social dialogue, Freedom of association, and collective bargaining rights;
- Discrimination (discrimination in the workplace, minority rights, sexual minorities and women's and girls' rights);
- Occupational health and safety;
- Working conditions (decent wages, decent working time, right to privacy, migrant workers); and
- Human rights (forced labour, modern slavery, child labour and security forces and human rights).

3.2 The Group's suppliers and subcontractors

The Group's normative documentation governs inherent E&S risk management in terms of sourcing and supplier relationship management. The Group relies on guidance tools to identify, assess and manage human rights risks at the level of the purchased product or service and of the supplier or service provider. Inherent human rights risk mapping is incorporated into an E&S risk mapping based on the main sourcing categories for the banking sector. The risk level assessment for each sourcing category notably considers loyal business practices and ethics (including fraud and corruption, personal data protection, rights of ownership and patents) and human rights (including freedom of association, freedom of assembly and collective bargaining, discrimination, occupational health and safety, working conditions, forced labour, modern slavery, child labour). Additional contextual factors were also built into the risk assessment for the sourcing category: supply chain characteristics (complexity, including the number of actors and distance from the intermediaries to the end purchaser) and labour intensity.

When the Sourcing Division identifies a potential risk of human rights violation by a supplier (through an alert raised, a controversy check or a drop in a supplier's extra-financial assessment), an enhanced due diligence is performed, that may lead to remedial action plans, and on-site E&S audits.

3.3 The Group's activities

3.3.1 The Group's human risk management process in relation to its products and services

The Group, which provides products and services to a wide range of customers, **is dedicated to identifying, assessing, preventing and mitigating risks of serious adverse impacts on human rights directly associated with the Group's products and services.**

These actions are being operationalized for corporate clients through the Group's general E&S risk management framework via three key steps applicable in a proportionate manner based on the importance of the E&S risks inherent to the clients' activities and their size:

1. Human Rights inherent risks identification: This step entails identifying whether clients or dedicated transactions present inherent risks of being associated with human rights violations (e.g., health and safety, forced and child labour, poor working conditions, zones of conflicts, use of excluded weapons, indigenous peoples' rights). Such analysis relies on several checks depending on the clients or underlying economic activities of dedicated transactions:

- internal E&S exclusion and identification lists;
- sector policies, containing exclusion and evaluation criteria specifically designed for sectors with intrinsic risks of human rights violations (Defense, Mining, Agriculture and Oil and Gas);
- eligibility for the Equator Principles, such as for Project Finance transactions where total project costs are above 10 million USD; and
- E&S controversies screening.

In addition to these checks, due diligence is conducted as part of KYC procedures and measures to counter corruption, financing of terrorism, tax evasion and money laundering.

2. Human Rights risks assessment:

- When an inherent human rights risk is identified in the risk identification step above, the business unit assesses the compliance of the clients or of the underlying activities of dedicated transactions with the Group's commitments and weighs up the severity of any controversies. For transactions in the Equator Principles scope, the Group carries out human rights assessments as per applicable procedures, which include respect of workers' rights, local communities' consultation and the rights of indigenous peoples.

3. Actions to prevent or mitigate Human Rights risks:

- Following the human rights risk assessment mentioned above, appropriate prevention and mitigation measures may be established and a regular monitoring may be implemented.
- For transactions in the scope of the Equator Principles, the clients are required to conduct an E&S assessment of the project and to propose measures to address, mitigate and monitor adverse impacts and risks, disclose information and consult with communities affected by the project, and establish a grievance mechanism, as appropriate. When necessary, the Group verifies the alignment with the Equator Principles with the support of an independent E&S consultant and requires audits and/or on-site visits by independent consultants and monitors the implementation of the E&S Action Plan.

3.3.2 The Group's clients' privacy

As stated in its Code of Conduct, the Group is attentive to its clients' privacy and undertakes to secure and protect its clients (both individual and corporate) data, and to use them in an ethical and transparent manner and in compliance with laws and regulations in order to provide its clients with the best possible service.

4. HUMAN RIGHTS AND THE GROUP'S STAKEHOLDERS

4.1 Dialogue with stakeholders

In a process of improving the identification of adverse impacts on human rights through its risk management processes, the Group encourages transparency and dialogue with its stakeholders.

The Group pays close attention to questions raised by its stakeholders concerning objective situations or risks of serious human rights breaches related to its activities.

With a view to continuous improvement, stakeholders' concerns are considered during the review and update of the Group's internal processes or E&S Sector Policies.

4.2 Whistleblowing set up

The Group has also set up a whistleblowing tool accessible via a [secure platform](#). In addition to the tool (Group and entity whistleblowing channels), an alert can also be raised to the managerial line, the compliance officer or to the HR correspondent. The whistleblowing system can be used by employees, members of the management body, Directors, shareholders, external and part-time employees, subcontractors and suppliers with which a business relationship exists, and third-party facilitators. They can report, anonymously or otherwise, any suspected potential or actual violation or attempt to conceal a violation of an international commitment, a law or a regulation; in respect of human rights, fundamental freedoms, health and safety or the environment; and regarding behaviour or a situation that runs counter to the Group's Code of Conduct.

This statement is posted on the Group's website and shall be updated as needed. It has been established in French and in English. In case of inconsistency between the French and the English version, the French version shall prevail.