



## SCOPE

Vigeo Eiris was commissioned to provide an independent opinion on the sustainable credentials of the "Positive Impact Bond" (PI Bond) considered by Société Générale, according to the Vigeo Eiris Environmental, Social and Governance (ESG) assessment methodology. The independent opinion is based on the review of the three components of a sustainable bond in line with the Green Bond Principles guidelines:

- Issuer: Analysis of the issuer ESG performance, controversies and allegations on ESG issues and capacity to mitigate these risks
- Assets: Evaluation of the eligible categories and analysis of ESG integration in the process for evaluation and selection, based on the assessment of the asset ESG and Positive Impact assessment frameworks
- Reporting: Assessment of reporting capacity and commitments for asset fund allocation, ESG benefits and asset management and for independent assurance.

Vigeo Eiris' sources of information are gathered from the issuer, press content providers and stakeholders (partnership with Factiva Dow Jones: access to the content of 28,500 publications worldwide from reference financial newspapers to sector-focused magazines, local publications or NGOs). Vigeo Eiris has reviewed these documents supplied by the issuer and conducted interviews with people from across different Société Générale services.

## VIGEO EIRIS OPINION

In light of the review of these three components, Vigeo Eiris confirms that the bond considered by Société Générale is a "Positive Impact Bond" aligned with the Green Bond Principles guidelines and Vigeo Eiris' level of assurance on the sustainability of the bond is reasonable<sup>3</sup> :

- The issuer displays a robust<sup>3</sup> ESG performance (see Part I.).
- The framework elaborated by Société Générale for this "Positive Impact Bond" is considered to be robust<sup>2</sup> (see Part II.):
  - The net proceeds of the issuance will be used to finance assets which have a positive impact on at least one of the three main sustainable development pillars (environment, social and economic) and for which an appropriate management of the potential negative impacts is implemented and not on the basis that they are offset by the positive impacts.
  - In addition, our level of assurance on the eligible asset evaluation and selection process is reasonable.
- For that issuance, positive impacts are focused on climate, i.e. assets contributing to the fight against climate change and the financing of a low-carbon economy. Expected climate benefits of assets, i.e. reduction of GHG emissions, are described and ex-ante estimated. The reporting commitments cover the fund allocation, environmental and social impacts, and some additional ESG information, showing an overall consistent level of transparency and a capacity to report on the Green Bond (see Part III.).

<sup>1</sup> Second Party Opinion – Green Bond Principles: This opinion is to be considered as the "Second Party Opinion" described in the Voluntary Process Guidelines for Issuing Green Bonds, issued by Green Bond Principles, 2016.

<http://www.icmagroup.org/assets/documents/Regulatory/Green-Bonds/GBP-2016-Final-16-June-2016.pdf> "Consultant review"

<sup>2</sup> The "Positive Impact Bond" is to be considered as the potential forthcoming operation, which issuance is subject to market conditions.

<sup>3</sup> Vigeo Eiris' scales of assessment (detailed definitions are available on page 11):

Performance: Advanced, Robust, Limited, Weak.  
Level of Assurance: Reasonable, Moderate, Weak.

## **Part I. ISSUER**

### Level of the issuer's ESG performance:

As at December 2014 (last Vigeo Eiris's review), Société Générale's overall ESG performance and commitments are considered as robust. The company is among the best performers of the European "Diversified Bank" Vigeo Eiris' sector. Société Générale achieves advanced performance in the Environment pillar, while in the Social and Governance pillars its score is robust. The company reports on ESG issues with particularly high level of transparency: Société Générale is the most informative company over 1,309 companies assessed by Vigeo Eiris<sup>4</sup>.

### Stakeholder-related ESG controversies<sup>5</sup> and disputable activities:

The Bank sector is particularly subject to ESG-controversies, especially regarding business ethics issues. As regards Société Générale specifically, as of August 2016, the company faced 19 controversies, mostly relating to business ethics and community involvement. The severity ranges from significant to critical, only one case is considered as critical, based on the analysis of its impact on the company and its stakeholders. Overall, the company is reactive and implements remedial actions for impacted stakeholders in response to the controversies faced.

Société Générale's involvement in armament is not significant (0.03% of outstanding corporate credits<sup>6</sup>) and Société Générale's Defence Sector Policy is strict with regards to controversial weapons.

### CSR risks mitigation:

Vigeo's level of assurance on Société Générale's management of its CSR risks is reasonable, including management of its human capital, reputation, operational efficiency and legal security risks.

## **Part II. ASSETS**

### Use of proceeds

According to Société Générale commitments, the company will finance and refinance eligible loans which are clearly defined as Positive Impact Finance, i.e. financing assets which have a positive impact on at least one of the three main sustainable development pillars (environment, social and economic) and provide an appropriate management of the potential negative impacts and not on the basis that these potential negative impacts are offset by the positive ones.

To focus on Positive Impact on Climate, Société Générale will select for this issuance Positive Impact Finance assets within **Renewable Energy category**. Eligible Assets' contribution to sustainable development is positive, due to expected environmental benefits on climate change mitigation, i.e. reduction of GHG emissions, which have been described and ex-ante estimated.

### Process for asset evaluation and selection:

The process for evaluation and selection of eligible assets is defined through two following steps:

- **ESG assessment framework**, according to social responsibility criteria (Environmental, Social and Governance), based on international standards in terms of sustainability and compliant with Equator Principles (when applicable), as:
  - ✓ Exclusion of transactions linked to activities prohibited by international conventions and agreements
  - ✓ Verification of ESG risks and controversies, covering:
    - ENVIRONMENT : Protection of biodiversity, management of pollutions and emissions, waste and water management, energy efficiency and GHG emissions
    - SOCIAL : Improvement of health & safety and working conditions, respect for human rights and prevention of violations, promotion of local development
    - BUSINESS ETHICS : prevention of corruption, anti-money laundering, prevention of conflict of interest
    - GOVERNANCE : board of directors, shareholding structure, ownership chain, ESG controversy analysis
- **Positive Impact assessment framework**, according to at least 17 impacts categories, including 9 social, 7 environmental and 1 economic, generating positive impacts on at least one of the pillars of sustainable development (Environmental, Social and Economic), with potential negative impacts correctly managed.
- In the event that any of the Positive Impact Finance assets currently allocated by Société Générale to this bond are prepaid, sold, cease to exist or for whatever reason cannot be considered as allocated to this bond, then Société Générale will, to the extent possible, replace such asset with another Positive Impact Finance asset.

<sup>4</sup>« What do companies report? »: a study conducted by Vigeo Eiris over 1,309 companies from across different sectors (published in January 2015).

<sup>5</sup> A **controversy** is defined on page 9. The opinion delivered on stakeholder-related ESG controversies is not a conclusion on the creditworthiness of Société Générale or its financial obligations.

<sup>6</sup> According to the company, as of December 2015, armament represents 0.03% of outstanding corporate credits of Société Générale (exposition to pure player companies in the armament sector).

We provide a reasonable level of assurance on the eligible asset evaluation and selection process, i.e. on both ESG and PI assessment frameworks.

- The ESG assessment framework is relevant, regarding international standards and sector issues, coherent with Société Générale's commitments in terms of responsible finance, and efficient in identifying, evaluating and integrating ESG issues in project selection and financing.
- The PI assessment framework is relevant, regarding sustainability issues, coherent with Société Générale's CSR commitments in terms of responsible finance, and efficient in identifying and evaluating impact management in order to conclude on positive benefits.
- The selection of eligible assets based on the defined selection process will use internal expertise, of the PI team, and will be reviewed on a quarterly basis.

#### Management of proceeds:

The rules for the management of proceeds and the allocation process are clearly defined by the issuer.

### **Part III. REPORTING COMMITMENTS**

Société Générale is committed to report annually on:

- Fund allocation: PIF assets financed and/or refinanced by the PI Bond proceeds, with related description of each asset, in line with confidentiality practices
- Ex-ante estimates of climate benefits aggregated at PI bond level
- Responsible management of assets with a description of typical negative impacts assessed for the eligible asset category regarding the pillars of sustainable development and with detailed results of the PI assessment for each asset, i.e. positive and negative impacts and their mitigations, in line with confidentiality practices

As of the issuance date and until the maturity of the bond, Société Générale is committed to report on the compliance of the assets selected with the above eligibility process defined, as well as on the climate benefits resulting from the financed assets.

Assets will be added to the report once the issuer has approved and determined an asset as eligible.

Monitoring conditions are clearly defined and selected reporting indicators are exhaustive and relevant regarding GHG accounting, showing a consistent capacity to assess and report on climate issues. Based on more qualitative information, the reporting on responsible management is more partial showing a sufficient level of transparency.

Vigeo Eiris' level of assurance on Société Générale's reporting commitments is reasonable.

### **INDEPENDENT ASSURANCE**

Société Générale's PI Bond framework is supported by independent assurance provided by:

- The hereby Second party opinion on sustainable credentials of the PI Bond, before the issuance and covering all the bond dimensions, i.e. issuer commitments, assets (use of proceeds and asset selection process) and reporting.
- A Third party whose role until the maturity of the bond will be annually two-fold:
  - ✓ to express, annually and until the maturity of the bond, a reasonable assurance as to whether the assets comply, in all material aspects, with the selection and monitoring criteria (in accordance with the international standard ISAE 3000 International Standard on Assurance Engagements)
  - ✓ to attest, annually and until the maturity of the bond, to the allocation of funds raised under Positive Impact Bonds to the assets and to the concordance of funds allocated to these assets with the amount in the accounts.

More detailed results are provided in the next pages for each component.

*This opinion is valid as of the date of issuance limited to Société Générale's Positive Impact Bond*

Paris, September 16<sup>th</sup> 2016



**Laurie Chesné**  
CSR Consultant



**Rudy L'espagnol**  
CSR Consultant

**Disclaimer**

Transparency on the relation between Vigeo Eiris and the issuer: Vigeo Eiris has, to date, executed three previous audit missions for Société Générale (including the second party opinion on PI bond in November 2015). No established relationship (financial or others) exists between Vigeo Eiris and Société Générale. This opinion aims to explain to investors why the PI Bond is considered as sustainable and responsible, based on the information which has been made available to Vigeo Eiris and which has been analyzed by Vigeo Eiris. Providing this opinion does not mean that Vigeo Eiris certifies the materiality, the excellence or the irreversibility of the assets financed by the PI Bond. Société Générale is fully responsible for attesting the compliance with its commitments defined in its policies, for their implementation and their monitoring. The opinion delivered by Vigeo Eiris focuses neither on financial performance of the PI Bond, nor on the effective allocation of funds' use of proceeds. Vigeo Eiris is not liable for the induced consequences when third parties use this opinion either to make investments decisions or to make any kind of business transaction. The opinion delivered on stakeholder-related ESG controversies is not a conclusion on the creditworthiness of Société Générale or its financial obligations.

## DETAILED RESULTS

### Part I. ISSUER

#### Level of the issuer's ESG performance:

As at December 2014 (last Vigeo Eiris's review), Société Générale displays an overall robust ESG performance.

Domain	Comments	Opinion assessment level
Environmental	In the Environment domain, Société Générale achieves an advanced performance, above the sector average. The bank discloses a comprehensive environmental strategy, including quantitative targets. A clear improvement is evident in 'Development of green products and services', with comprehensive commitment in its ESG Integration Governance Policy and dedicated means to guarantee the analysis of environmental risks in its lending activities. The E&S Guidelines and sectorial policies that guide the company's financing decisions are part of a comprehensive approach to address indirect environmental impacts. In terms of business travels, a quantitative target has been recently communicated.	Advanced
		Robust
		Limited
		Weak
Social	Société Générale continues to display a robust performance in the Human Resources and the Community Involvement domains. Employee-representatives are present at Board level and the company states to work to maintain dialogue with its employees in various ways, depending on the size and structure of local teams and the applicable laws in each country out of Europe.  Otherwise, in line with its strategic priorities, the bank discloses comprehensive efforts to support local development and customers in financial distress.  At last, Société Générale achieves an advanced performance in the Human Rights domain, above its sector average. Procedures through which employees can voice their concerns are available also in sensitive countries for the protection of freedom of association. Concerning diversity, Société Générale set specific targets for women in management and a Diversity Board defines the strategy and monitors the actions proposed by the Group diversity team.	Advanced
		Robust
		Limited
		Weak
Governance	Société Générale's performance in the Business Behaviour and Corporate Governance domains is robust. The company reveals efficient efforts to manage fair relations with clients and business ethics. A relevant improvement is noticed for Responsible Lobbying, due to the adoption of a policy covering the majority of issues at stake and the signature of the Common declaration on lobbying by Transparency International France's corporate members.  Moreover, the company discloses the process for the definition of its material risk takers and their remuneration is reviewed by the Internal Audit division. Société Générale's score in 'Executive remuneration' is robust due to the integration of CSR performance conditions for the variable part and the set up of risk alignment rules in the remuneration of senior executives and material risk takers.	Advanced
		Robust
		Limited
		Weak

Société Générale is included in the following Vigeo Eiris Indices (as the date of publication):



#### Stakeholder-related ESG controversies and disputable activities

- ESG Controversies (sources: Factiva research and company's sources)

**Frequency:** as of August 2016, Société Générale faces frequent allegations, with 19 stakeholder-related ESG controversies. That frequency is above the average of Vigeo Eiris' European Diversified Bank sector, which is occasional.

**Severity:** the company faces 1 case of critical severity; 9 of high severity and 9 of significant severity. The average of Vigeo Eiris' Diversified Bank sector in terms of severity is high.

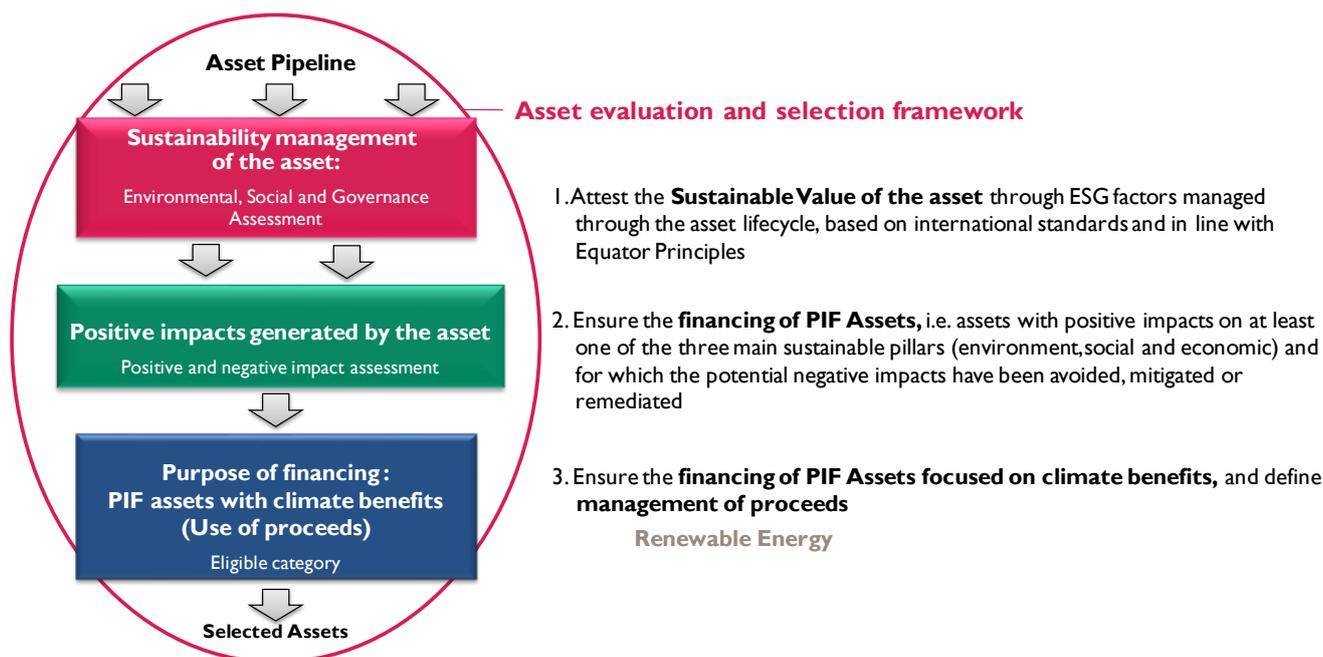
**Responsiveness:** the company is cooperative with impacted stakeholders and implements remedial actions for 42% of the cases it faced, and is reactive in 53% of the cases. Société Générale is not communicative in one significant case. The company's responsiveness is in line with the average of Vigeo Eiris' European Diversified Bank sector, which is reactive.

- Involvement in disputable activities

According to the company, Société Générale's involvement in armament is not significant (0.03% of outstanding corporate credits regarding the exposition to pure player companies in the armament sector) and Société Générale's Defence Sector Policy is strict with regards to controversial weapons.

In addition, Société Générale's Defence Sector Policy is positively evaluated by organization targeting bank's financing cluster munition producers even though margins for improvement remain in the coverage of this policy.

## Part II. ASSETS



The selection of eligible assets is performed by the internal Positive Impact Finance team according to internal procedures. Assets will be added to the report once the issuer has approved and determined an asset as eligible.

### Use of proceeds

Eligible assets include PI assets (i) which contribute to fight against climate change, i.e. defined eligible category (ii). Eligible assets are assessed according to ESG and PI assessment frameworks evaluated by Vigeo Eiris, and available on the Issuer website in the Investors Relations section.

- PI assets are assets which have a positive impact on at least one of the three main sustainable development pillars (environment, social and economic) and for which an appropriate management of potential negative impacts is implemented (including avoidance, mitigation, remediation and/or compensation)
- Eligible asset category is defined to focus on positive impacts on climate, as positively contributing to climate change mitigation.

Eligible asset Category	Definition	Environmental benefits
Renewable Energy	Investment in conception, construction and installation of renewable energy production units, i.e. energy produced from renewable non-fossil sources including hydro, geothermal, wind, solar, biomass or from any other renewable source of energy	Reduction of GHG emissions

Environmental benefits of these assets have been described and ex-ante estimated by internal expertise, as contributing to climate change mitigation, due to reduction and/or avoidance of GHG emissions.

## Process for asset evaluation and selection - Environmental, social and governance (ESG) integration

Société Générale has made commitments in terms of Responsible Finance to attest:

- The sustainable value of the financed asset through environmental, social and governance (ESG) assessment
- The positive impacts generated by the financed asset on at least one of the three main sustainable development pillars (environment, social and economic)

### ESG Assessment

The ESG evaluation principles are exhaustive and precise, regarding:

- E&S General Principles Guidelines, which are based on international standards in terms of sustainability: Global Compact, OECD Guidelines, ILO Conventions, Equator Principles...
- Sector and transversal policies<sup>7</sup>, which cover conclusively the major CSR specific risks for each sector and define dedicated requirements to the client and to transactions, in line with sector standards.

E&S General Guidelines and sector policies are publically available on the Société Générale website and internal responsibilities are well-defined in order to ensure the effective implementation of ESG evaluation principles within the bank.

The ESG assessment framework implemented by Société Générale is robust and coherent with its commitments:

- Exclusion of prohibited activities and protected areas are clearly defined<sup>8</sup>
- Research of ESG controversies (sector, client, asset) is integrated into the ESG assessment process
- The requests from NGOs are submitted to an internal investigation and if necessary a corrective action plan is implemented
- The assessment process is formalized, with a precise definition of the different steps in the evaluation depending on the transaction risk categorization (A, B, C or non-applicable)
- The E&S Screening and Categorization Form, customized on E&S issues of the transaction sector, ensures the traceability of the evaluation
- Transactions categorized as medium (B) and high risk (A) are subject to a depth analysis and specific monitoring
- The ESG evaluation of the transaction is systematically verified internally, with a depth control in case of transactions categorized as medium and high risk

### Positive Impact Assessment

#### Identification of eligible assets

The method for identifying assets with potential benefits, i.e. qualified as a priori 'Positive Impact Finance' assets (generating positive impacts), is based on coherent and well-defined factors, as:

- Sectors, "a priori" positive, defined by a referential tab identifying potential positive, neutral and negative impacts on the three pillars (social, environmental and economic), covering most currently observed impacts for asset of each sector in order to provide a first assistance for the further assessment
- Transversal improvements listed, such as energy efficiency, recycling, food security, human rights,...
- Regions, defined as developing countries based on a list of countries according to their level of development (World Bank classification)
- Types of economic actors, i.e. SMEs / SMLs based on a grid of eligibility thresholds (employees and turnover)

Correspondence with one of these four factors allows the Front Officer to detect an asset with potential benefits and to identify assets associated with transactions that will be subject to an evaluation of the impact management, to confirm/check whether or not these benefits exist.

#### Evaluation of the asset impacts regarding the Positive Impact assessment framework

The evaluation framework is relevant:

- 17 impact categories, including 9 social, 7 environmental and 1 economic are clearly defined, using reliable sources of information
- Impact categories are exhaustive regarding environmental and social issues
- Positive, neutral and negative impacts are considered during the evaluation process

<sup>7</sup> **E&S Policies:** Dams & hydropower, Thermal power, Coal-fired power, Defense, Mining, Shipping, Civil nuclear power, Oil & gas, Palm oil, Forestry & forest products, fishing & agri-food, Biodiversity (available on the issuer website).

<sup>8</sup> **Prohibited activities / protect area:** cluster bombs and anti-personnel mines; PCBs-containing products, asbestos containing products excluding asbestos cement sheeting (less than 20%); pesticides, herbicides, pharmaceuticals and other hazardous substances subject to international bans; CFCs, halons and other ozone depleting substances subject to international bans, trade in wildlife regulated under Convention on International Trade in Endangered Species of Wild Fauna and Flora.

The eligibility threshold to 'Positive Impact Finance' is clearly defined:

- The asset must have a positive impacts on at least one of the pillars of sustainable development (Environmental, Social and Economic) which is ex ante estimated
- Any asset with negative impacts - not remediable or not appropriately remediated - on a pillar is not eligible

The Positive Impact assessment framework implemented by Société Générale is robust and coherent:

- The assessment process is formalized, with a precise definition of the different steps, rules and system of scoring and consolidation of impact categories in order to assess impact management and to conclude on the positive benefits. In addition, assets are accepted if the negative impacts are appropriately avoided, minimized, or compensated/offset and not on the basis that they are offset by the positive impacts
- The impact evaluation for each category is justified and documented. In the case that positive impacts are measured, such measurement is reported with, as the case may be, the method used along with the second opinion/audit performed.
- The PI memo and the registration of the PI assessment conclusion in the process ensure the traceability of the evaluation
- The PI evaluation of the transaction is systematically verified internally

The eligible asset category is covered by the Positive Impact assessment framework.

### Management of proceeds

The net proceeds of the issuance will be managed within Société Générale treasury liquidity portfolio, before fund allocation, in papers issued by supranational institutions, such as the World Bank, the EBRD or similar supranational institutions, that reasonably appear to not include disputable activities.

At the 31<sup>st</sup> of August, the issuer has already identified eligible projects which represent the main share of the total amount of the considered bond. Moreover, Société Générale commits on a best effort basis to select further eligible Positive Impact assets to reach full allocation and at least 80% within 12 months after the issuance. However, Vigeo Eiris has no visibility on the allocation period for the remaining 20%.

In case of divestment or early reimbursement, the issuer will use the net proceeds to finance other Eligible PI asset compliant with the current Use of Proceeds framework.

## **Part III. REPORTING**



Monitoring conditions and reporting indicators are clearly defined and exhaustive both on financed assets, climate benefits and responsible management in order to report on:

- Fund allocation at bond level
- Climate benefits based on ex-ante estimates of expected climate results aggregated at bond level
- Responsible management based on monitoring of ESG negative impact mitigations, reported at asset level

Assets will be added to the report once the issuer has approved and determined an asset as eligible.

Société Générale is committed to transparently report annually on fund allocation in a dedicated Investor Report, up to the total amount raised by Société Générale through the bond, which is reviewed by an independent auditor. In addition, annually and until the maturity date of the bond, an investor-dedicated section on assets financed and/or refinanced by the net proceeds of the PI Bond issuance, on the compliance of the net proceeds' allocation with the above described process and on performance reporting indicators, will be included within an annual dedicated Report to be made available to the investors and verified by a third party (independent auditor).

### Fund allocation

Criteria	Reporting indicators
PI assets financed and/or refinanced by the PI Bond proceeds, in line with confidentiality practices, by asset category and geographical area	<ul style="list-style-type: none"> <li>- Proceeds allocation (in €) including a breakdown by geographical area, with related description of each asset</li> <li>- Total outstanding amount of selected loans and percentage of allocated Positive Impact Bond proceeds</li> </ul>

### Climate benefits

Category	Reporting indicators
Renewable Energy	<ul style="list-style-type: none"> <li>- Capacity of renewable energy plant(s) constructed or rehabilitated in MW and</li> <li>- Ex-ante estimated annual GHG emissions reduced or avoided in tCO<sub>2</sub>e aggregated at bond level (according to the methodology developed by European Investment Bank<sup>9</sup>)</li> </ul>

### Responsible management

The issuer commits to initially report on specific E&S positive and negative impacts (impact categories detailed below), which are identified through the PI assessment framework, and their mitigations, and give annual update during all the bond maturity, in line with confidentiality practices.

Environmental impact categories	
Air	Climate
Water	Resources efficiency
Soil	Waste efficiency
Biodiversity	
Economic impact categories	
Economical convergence	

Social impact categories	
Access to water	Access to transportation
Access to energy	Access to housing
Level of education	Access to food
Quality of health	Job creation
Physical or economical resettlement	Access to transportation
Other (access to information, archeological and cultural heritage,...)	

When necessary, other impact categories may also be assessed in the “other” category.

<sup>9</sup> The European Investment Bank developed methodologies for the assessment of project GHG emissions and emission variations [http://www.eib.org/attachments/strategies/eib\\_project\\_carbon\\_footprint\\_methodologies\\_en.pdf](http://www.eib.org/attachments/strategies/eib_project_carbon_footprint_methodologies_en.pdf)

## METHODOLOGY

In Vigeo Eiris' view, ESG factors are intertwined and complementary and cannot be separated when assessing the management of sustainability in any organization or in any activity, including the issuance of sustainable bonds. In this sense, we write an opinion on the issuer's responsibility as a corporate organization, and on the objectives, the management and the reporting of the asset financed by this bond.

Vigeo Eiris' methodology to define and to assess corporate ESG performance is based on criteria aligned with public international standards, in compliance with the ISO 26000 guidelines, and organized in 6 domains: Environment, Human Resources, Human Rights, Community Involvement, Business Behavior and Corporate Governance. The evaluation framework has been customized regarding material issues, based on the Vigeo Eiris' Diversified Banks assessment framework and specificities inherent to the worldwide markets and emerging issues.

Vigeo Eiris' review uses information provided by Société Générale, press content providers and stakeholders (partnership with Factiva Dow Jones : access to the content of 28,500 publications worldwide from reference financial newspapers to sector-focused magazines, local publications or Non-Government Organizations). Information gathered from these sources will be considered as long as they are public, documented and traceable. In total, Vigeo Eiris has reviewed around 20 documents (E&S General Principles Guidelines, E&S policies, Positive Impact Finance procedures), online information and conducted interviews with 3 people from PI team of the bank.

### **Part I. ISSUER**

#### Level of the issuer's ESG performance:

Société Générale has been evaluated by Vigeo Eiris, during December 2014 on its social responsibility performance, based on 21 relevant ESG drivers organized in the Vigeo Eiris' 6 sustainability domains, according to the Diversified Bank assessment framework.

Société Générale's ESG performance have been assessed by Vigeo Eiris on the basis of three "items":

- **Leadership:** relevance of the commitments (content, visibility and ownership)
- **Implementation:** coherence of the implementation (process, means, control/reporting)
- **Results:** indicators, stakeholders feedbacks and controversies
  - Scale for assessment of ESG performance: Advanced, Robust, Limited, Weak.

#### Stakeholder-related ESG controversies and disputable activities

An ESG controversy is information, a flow of information, or contradictory opinions that are public, documented and traceable allegation against an issuer on corporate responsibility issues. Such allegations can relate to tangible facts, be an interpretation of these facts, or constitute an allegation on unproven facts.

Vigeo Eiris provides an opinion on companies' controversies risk mitigation based on the analysis of three factors :

- **Severity:** the more a controversy will relate to stakeholder's fundamental interests, will prove actual corporate responsibility in its occurrence, and will have adverse impacts for stakeholders and the company, the highest its severity. Severity assigned at corporate level will reflect the highest severity of all cases faced by the Company (scale: Minor, Significant, High, Critical);
- **Responsiveness:** ability demonstrated by an issuer to dialogue with its stakeholders in a risk management perspective and based on explanatory, preventative, remediating or corrective measures. At corporate level, this factor will reflect the overall responsiveness of the company for all cases faced (scale: Proactive, Remediate, Reactive, Non Communicative);
- **Frequency:** reflects the number of controversies faced for each ESG challenge. At Corporate level, this factor reflects on the overall number of controversies faced and scope of ESG issues impacted (scale: Isolated, Occasional, Frequent, Persistent).
- Scale for assessment of ability to mitigate stakeholder-related ESG controversies: Advanced, Robust, Limited, Weak.

The impact of a controversy on a company's reputation reduces with time, depending on the severity of the event and the company's responsiveness to this event. Conventionally, Vigeo Eiris' controversy database covers any controversy with Minor or Significant severity during 24 months after the last event registered and during 48 months for High and Critical controversies.

In addition, 9 disputable activities have been analysed following 30 parameters to verify if the company is involved in one of them: Alcohol, Animal maltreatment, Armament, Hazardous chemicals, Gambling, GMOs in food & feed, Nuclear energy, Sex industry, Tobacco.

**Part II. ASSETS**

Use of proceeds

The use of proceeds requirements are defined to ensure that the funds raised are used to finance eligible assets and are traceable within the issuing organization, and include the management of proceeds. The purpose of the bond’s associated eligible assets has been precisely defined, with regard to Société Générale’s commitments, and assessed regarding described ex-ante estimated climate benefits of the eligible Positive Impact Finance assets. The contribution of the eligible project to Sustainable Development is evaluated regarding the UN Sustainable Development Goals.

Process for asset evaluation and selection - Environmental, social and governance (ESG) integration

Société Générale’s evaluation and selection process has been reviewed by Vigeo Eiris regarding the exhaustiveness and the relevance of ESG and PI assessment frameworks, based on a framework aligned with public international standards, in compliance with the ISO 26000 norm, as well as the Equator Principles.

- Scale of level of assurance on asset selection process: Reasonable, Moderate, Weak

**Part III. REPORTING**

Reporting indicators and monitoring conditions have been reviewed by Vigeo Eiris regarding annual reporting commitments on fund allocation, climate benefits and on responsible management of the assets financed by the PI Bond proceeds, based on Green Bonds Principles, climate issues and GHG accounting methodologies.

Vigeo Eiris has evaluated the relevance of these indicators according to three following principles: transparency, exhaustiveness and effectiveness, in order to provide an opinion on the issuer’s commitment and capacity to report on the potive impact bond.

- Scale of level of assurance on reporting commitment on assets: Reasonable, Moderate, Weak

**VIGEO EIRIS’S ASSESSMENT SCALES**

Performance evaluation	
Advanced	Advanced commitment; strong evidence of command over the issues dedicated to achieving the objective of social responsibility. Reasonable level of risk management and using innovative methods to anticipate emerging risks.
Robust	Convincing commitment; significant and consistent evidence of command over the issues. Reasonable level of risk management.
Limited	Commitment to the objective of social responsibility has been initiated or partially achieved; fragmentary evidence of command over the issues. Limited to weak level of risk management.
Weak	Commitment to social responsibility is non-tangible; no evidence of command over the issues. Level of insurance of risk management is weak to very weak.

Level of assurance	
Reasonable	Able to convincingly conform to the prescribed principles and objectives of the evaluation framework
Moderate	Compatibility or partial convergence with the prescribed principles and objectives of the evaluation framework
Weak	Lack or unawareness of, or incompatibility with the prescribed principles and objectives of the evaluation framework