

BNP PARIBAS AND HUMAN RIGHTS

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BNP PARIBAS

The bank for a changing world

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1. CONTEXT

As a leading financial institution, BNP Paribas daily supports its millions of individual and corporate clients through the commitment and expertise of its employees. Broadly speaking, its stakeholder ecosystem also includes its suppliers, as well as the communities that may be impacted by the businesses that the Group supports, through its financing and investment activities. As soon as 2012, BNP Paribas recognized the importance of respect for human rights in the way it was conducting business in its *Statement on Human Rights*.

In its company purpose, BNP Paribas states in particular that the Group is “working with [its] stakeholders and ha[s] adopted social and environmental goals aligned with global standards such as the United Nations Sustainable Development Goals and those of the financial community such as the Principles for Responsible Banking and the Principles for Responsible Investment.”

In order to maintain a fruitful dialogue with its stakeholders, both internal and external, on this important subject, and to act at every moment in accordance with its company purpose, the BNP Paribas Group has set out in this document the principles guiding its action in the field of human rights.

This document is a general information document designed to describe BNP Paribas’ approach to human rights issues driving the policies and commitments undertaken by the Group.

2. GENERAL APPROACH

1. Principles for action

BNP Paribas believes that the primary responsibility for the protection of human rights lies with States and their governments and recognizes that companies also have an important role to play.

BNP Paribas is committed to respecting human rights, as defined in the *Universal Declaration of Human Rights* of the United Nations. These rights serve as a reference for the Group in all its activities, in all the countries in which it operates, and in all the relationships it maintains with its stakeholders (employees, suppliers, customers and companies in which the Group invests, populations potentially impacted by companies and projects financed by the Group).

BNP Paribas' approach to human rights is guided by the [International Bill of Human Rights](#), the [fundamental conventions](#) established by the International Labour Organization (ILO), as well as by the [United Nations Guidelines on Business and Human Rights](#) and the [OECD Guidelines for Multinational Enterprises](#).

2. Governance

Respect for human rights is firstly based on the governance implemented by BNP Paribas in terms of social and environmental responsibility.

The Environmental, Social and Governance (ESG) strategy, including human rights, is determined by Executive Management and validated by the Group’s Board of Directors, which relies on the expertise of two of its specialized committees, the Governance, Ethics, Nominations, and CSR Committee (CGEN) and the Internal Control, Risk, and Compliance Committee (CCIRC).

In addition to the CSR Department, ESG issues are monitored by the Human Resources (HR) Department when they are related to Group employees, the Procurement & Performance (P&P) Department when they are related to BNP Paribas suppliers and subcontractors, and by the main business lines within BNP Paribas’ operating divisions. In addition, the Finance, Compliance, RISK and LEGAL Directions also take part to the oversight of the Group's ESG issues.



3. STAKEHOLDERS

1. Employees

BNP Paribas undertakes to treat all its employees with dignity and respect, and expects them to respect human rights in their professional activities.

In this respect, the policies tackling the security of persons and property, the [Code of conduct](#), the [BNP Paribas Agreement on Fundamental Rights and Global Social Framework](#) (Global Agreement) and other HR agreements, policies or frameworks, apply to the Group's employees in matter of freedom of association and collective bargaining; diversity, equality, inclusion and prevention of discrimination; health and safety and quality of life at work.

Training modules on Human Rights & Business have been assigned to employees who play a role in promoting respect for human rights as part of their professional activities. Lastly, in order to strengthen the compliance culture, a target related to the compliance with the Code of Conduct, applicable rules and regulations, is assigned each year to all Group employees. Any breach of these principles, including respect for individuals, is formalized by the manager as part of the employee's annual professional appraisal.

2. Suppliers and subcontractors

BNP Paribas works with its suppliers to develop more sustainable supply chains, especially with the inclusion of clauses related to human rights into its [Sustainable sourcing charter](#), which sets out the reciprocal commitments of the Group and its suppliers and subcontractors from an ethical, environmental and social standpoint.

In addition, BNP Paribas has integrated into its ESG risk management system for its suppliers and subcontractors the use of ESG questionnaires in calls for tenders, with ESG criteria, including human rights-related ones, being taken into account in the evaluation of proposals; and the training of Procurement teams.

In the contracts with its suppliers and subcontractors, BNP Paribas integrates standard contractual clauses covering requirements in order to meet environmental and social criteria (including human rights). Since 2018, they have also included the option of ending contracts if suppliers do not comply with the Group's ESG requirements.

3. Individual clients

The Group has identified two main risks of human rights violations in the distribution of its products and services to individuals: discrimination in access to financial services, and violation of the right to privacy (breach in clients' personal data protection).

- [Non-discrimination in access to financial services](#) is included in the internal policy on the Clients' Interest Protection (CIP). The CIP policy, which is monitored by the integrated Compliance Function, defines the rules of organization and conduct applicable within the Group for the protection of clients' interests.
- [Privacy protection](#) is a priority for the Group, which is committed to being exemplary in the protection of personal data that it collects and processes in the course of its activities. To this end, BNP Paribas is committed to strict compliance with the regulations in force in each country and, with regard to the General Data Protection Regulation (GDPR), BNP Paribas has published a Personal Data Protection Information Notice, which is [publicly available](#) on the Group's website and regularly updated.



4. Corporate client and companies in which the Group invests on behalf of third parties

BNP Paribas expects its corporate clients and companies in which it invests on behalf of third parties to manage both their own activities and their supply chains in a way that respects human rights. In the most sensitive sectors, the BNP Paribas Group has defined specific financing and investment policies that include human rights criteria.

The Group assesses and monitors the exposure of its corporate clients¹ to ESG risks through the *ESG Assessment*, an assessment framework capturing the most salient issues in the sectors of activity of the Group's clients, and covering five dimensions, two of which are related to human rights (health and safety of employees and impact on communities). The *ESG Assessment* is based on sector questionnaires, taking into account the material issues of the client's activity and integrating, when appropriate, the criteria defined in the Group's financing and investment policies, supplemented by an analysis of possible controversies affecting the client.

As part of its strategy of investment on behalf of third parties, BNP Paribas Asset Management is also working to identify, prevent and mitigate potential negative human rights impacts that may arise or be related to the activities of the companies in which it invests. In addition to the application of the sectoral policies governing the Group's activity towards industries with particularly salient ESG issues, the exclusion of certain sectors and a voluntary shareholder stewardship policy (dialogue with issuers, voting policy, engagement with companies, particularly on occupational health and safety and the fight against modern slavery) complete this approach.

5. Local communities

BNP Paribas, a signatory of the Equator Principles since 2008, takes into account the issues that may impact local communities in its project financing activities, and encourages its clients, in all countries, to obtain the Free, Informed and Prior Consent (FPIC) of the local populations impacted by the projects. This framework has been reinforced by the deployment of the *ESG Assessment* questionnaires since 2021, which assesses the management of ESG topics by the Group's corporate clients on five dimensions, including one covering impact on communities, through dedicated questions and analysis of controversies.

6. Stakeholder dialogue and ethics alert system

BNP Paribas' willingness to maintain an open, constructive and fruitful dialogue with its stakeholders is reflected in the measures taken by the Group to structure and facilitate this dialogue. The way in which BNP Paribas gathers and processes inputs from its stakeholders is detailed in the [Dialogue with stakeholders position](#), which is regularly updated.

A Group-level whistleblowing system, placed under the responsibility of dedicated points of contact within the Compliance and Human Resources functions, can be activated by BNP Paribas external stakeholders, using a whistleblowing form available on the Group's website [link: [BNP Paribas whistleblowing framework](#)].

BNP Paribas' approach in terms of respect for, and promotion of, human rights is part of a drive for continuous improvement. The Group will update its human rights-related framework when necessary.

¹ At the time of publication of this document, the *ESG Assessment* has been deployed on the large corporate segment of BNP Paribas' clients and will be adapted and extended to other customer segments in a logic of continuous improvement.

