

**STATEMENT ON MODERN SLAVERY AND HUMAN TRAFFICKING**

# **2022 BNP PARIBAS STATEMENT**



**BNP PARIBAS**

The bank  
for a changing  
world

This Statement applies to BNP Paribas (the **Parent Company**) and its subsidiaries listed below (the **Subsidiaries**)<sup>1</sup>:

In the United Kingdom:

- BNP Paribas Securities Services (UK)
- BNP Paribas Asset Management UK Limited
- BNP Paribas Leasing Solutions
- BNP Paribas Personal Finance
- Creation Financial Services
- Creation Consumer Finance
- Opel Vauxhall Finance

The Parent Company and the Subsidiaries are together described as the **Group** in this Statement.

## INTRODUCTION

This Statement outlines the steps that BNP Paribas has taken to ensure that human trafficking<sup>2</sup> and modern slavery<sup>3</sup> are not taking place in its business or in any of its supply chains. It also refers to the risk management processes that the Group has put in place in the context of its financing and investment activities, which govern the potential cases of human rights violations that may affect the activities of its clients. This Statement is for the financial year ended 31 December 2021. The Board and CEO attest annually that the Group complies with this Statement through the information provided by the respective departments of Corporate Social Responsibility (CSR), Group Strategic Sourcing and Human Resources (HR).

---

<sup>1</sup> Other BNP Paribas subsidiaries that are required to have a slavery and modern trafficking statement have chosen to produce their own statement.

<sup>2</sup> "Recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation", United Nations Convention against Transnational Organized Crime.

<sup>3</sup> "Slavery is the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised." United Nations Convention on Slavery.

# THE BNP PARIBAS GROUP

BNP Paribas is Europe's leading provider of banking and financial services. It operates in 65 countries and employs 189,765 Full-Time Equivalent workforce. It holds key positions in its three main areas of activity: Retail Banking (Retail Banking networks in Europe, Africa and America), Investment & Protection Services (solutions in savings, investment and protection solutions) and Corporate and Institutional Banking (tailored financial solutions for our corporate and institutional clients). More information on BNP Paribas operations can be found in [Presentation of operating divisions and business lines](#).

BNP Paribas purchases around EUR 9 billion of expenditures on a yearly basis to support its activities. Its suppliers belong to the nine following categories: Real Estate, Market & Data Information, Marketing & Communication, Consumables & General Services, Banking Services, Professional Services, Technology, Transaction Fees and Travel.

## RISKS OF MODERN SLAVERY & HUMAN TRAFFICKING

Academic studies, field investigations and recent news coverage have all clearly demonstrated that all sectors, industries and areas may be affected, to varying degrees, by these types of serious infringements to human rights.

In recent months, the issue of forced labour in globalised value chains has been extensively discussed in the media and tackled by regulators. In this regard, risk assessment policies devoted to the matter of modern slavery practices need to be multi-factorial (with complementary thematic screenings performed, on sector & industry, products & services, geographical and entity level) and regularly updated, in order to tackle this complex issue as fully and efficiently as possible.

The risk-assessment process BNP Paribas implements to address the risks of modern slavery and human trafficking takes into account the vastly different situations of its stakeholders, and is complemented by the *ad hoc* monitoring and regular discussions performed by Group teams on this subject.

### Workforce's inherent risks

Risks of modern slavery and human trafficking have been deemed low in business operations as, to the best of our knowledge, no publicly available study has categorised the banking sector and its employees, most of them being highly skilled professionals, as particularly exposed to these practices.

### Suppliers' inherent risks

As a bank, BNP Paribas' supply chains are mainly focused on indirect procurements and expenditure (consulting services, IT services, security, IT equipment, office furniture, promotional items, cleaning and catering services). Depending on the procurement categories, supply chains may be simple or very complex, with human rights related risks being higher, and more difficult to monitor, where supply

chain arrangements are complex. Based on the risk mapping tool developed by BNP Paribas, less than 25% of the Group procurement categories are at high risk of modern slavery or child labour.

## Banking and Financial activities' inherent risks

BNP Paribas meets the needs of millions of individual and professional customers, entrepreneurs, small, medium and large companies in business sectors facing multiple environmental, social and governance (ESG) challenges. The Group also operates in countries where legal and governance systems are at diverse levels of development. This diversity of context calls for structured, comprehensive and expert-driven review and analysis processes, in order to identify potential risks of modern slavery and human trafficking in BNP Paribas clients' activities.

# BNP PARIBAS POLICY ON MODERN SLAVERY AND HUMAN TRAFFICKING

Respect for human rights is one of the pillars on which BNP Paribas' CSR strategy is based. The Group has committed itself to the promotion of the following principles and standards that form the basis of its activities:

- The United Nations Sustainable Development Goals;
- The Ten Principles of the United Nations Global Compact;
- The United Nations Guiding Principles on Business and Human Rights;
- The internationally-accepted OECD Guidelines for multinational enterprises;
- The internationally-accepted standards of human rights, as defined in the International Bill of Human Rights;
- The core labor standards set out by the International Labor Organization.

These public commitments are backed by internal policies implemented at Group level, with the goal of handling the many subjects revolving around social, environmental and governance matters, including human rights. These policies include:

- BNP Paribas Group [Code of Conduct](#);
- The BNP Paribas [Statement on Human Rights](#);
- The BNP Paribas [Sustainable Sourcing Charter](#);
- The BNP Paribas [Responsible Business Principles](#).

Early and efficient identification of modern slavery risks is the first step towards its prevention, alleviation and remediation, and calls for specific policies and practices. In this regard, BNP Paribas has taken the following steps and actions in order to exercise its duty of care with all due seriousness.

## Towards its employees

BNP Paribas is committed to providing a working environment in which all employees are treated fairly. In particular, the Group focuses on respect and the need to apply the most stringent norms of professional behaviour, and rejects all forms of discrimination. The Group's existing policies and procedures notably include an annual review of high-risk countries in terms of human rights, as well as a monitoring of employees under 18 years (none in 2021).

Furthermore, the Group's Diversity policy and remuneration principles reaffirm the application of non-discrimination principles in the recruitment and career management of its employees. The BNP Paribas Code of conduct, which applies to all employees, reaffirms the Group's commitment to changing behaviour and combating disrespectful behaviour towards people, including harassment and discrimination.

In line with these policies and principles, all employees of the Group are required to treat their colleagues with respect, make sure their interactions are professional and efficient, and be receptive of their contributions, even if they express different views from their own.

The Global Agreement, signed with UNI Global Union on September 2018, sets up an ambitious plan to fight against inequalities and improve the working conditions of the Group's employees.

### Awareness and Training

BNP Paribas took part in the development of an awareness-raising e-learning module called "Business and Human Rights", co-created with the other members of the French association *Entreprises pour les Droits de l'Homme* (Businesses for Human Rights – EDH). This e-learning module is mandatory for all employees who directly contribute to the promotion of human rights including Risk management teams, Procurement, relationship managers in Corporate and Institutional Banking (CIB) and the CSR network. Available in eight languages and freely accessible to all Group employees, it was updated in 2021.

### Raising concerns

BNP Paribas Group pays particular attention to the concerns of customers, employees, shareholders, suppliers and society as a whole. The Group is committed to listening, understanding and seeking to respond to the concerns raised by its stakeholders in a fair and effective manner.

BNP Paribas employees are required to report any effective or suspected breach of the Code of conduct, Group policies and procedures, or regulations.

If they cannot send their report to their manager or through another usual channel, they have the option of raising a confidential ethics alert, in accordance with the whistleblowing procedure in force within the Group.

Any problem concerning a violation or a suspected violation of human rights within the framework of the activities of the Group or of its supplychain can be reported by an ethics alert, except when specified otherwise by local regulations or procedures.

Our whistleblowing policy guarantees employees exercising their right to raise an alert protection against reprisal for having raised an internal alert in good faith.

A summary note on whistleblowing is [available](#) on the BNP Paribas Group website.

## Towards its suppliers

Within Group Strategic Sourcing Function, dedicated teams address CSR risks linked to suppliers and subcontractors. BNP Paribas ESG risk management related to its suppliers and subcontractors hinges around the following elements:

- a responsible purchasing policy that aligns the Function's objectives with the Group's CSR objectives, as expressed in the [Group purpose](#) (*raison d'être*);
- the definition by the Function of a normative reference framework. This framework includes:
  - an ESG risk mapping tool encompassing thirteen themes, including modern slavery and child labour, allowing the identification of procurement categories at high environmental or social risk;
  - a '[Sustainable Sourcing Charter](#)', setting out the reciprocal commitments of the Group and its suppliers and subcontractors from an environmental and social standpoint;
  - contractual clauses requiring compliance with the ILO conventions in supplier contract standard templates in all countries where suppliers are located, allowing contract termination in case of non-compliance by the suppliers of the Group ESG requirements;
  - ESG questionnaire models, used during calls for tenders and including environment, ethics and human rights targeted questions;
  - supplier monitoring rules, targeting ESG criteria used during the selection process and completed by the thematic regulatory watches;
  - training of Procurement function employees.

In 2020-2021, BNP Paribas also completed its framework by launching, with three other banks and a third party assessor, on-site social and environmental audits for two categories of purchases.

## Towards its clients (banking and financial activities)

BNP Paribas strives to reduce potential violation of social and environmental rights, including human rights, from its financing and investment activities (as described in [Systematic integration and management of Environmental, Social and Governance risks \(ESG\)](#)). Its ESG risk management system is based on:

- the development of financing and investment policies managing the Group's activities in sectors with significant ESG issues;
- the respect of the Equator Principles for major industrial and infrastructure projects;
- the integration of ESG criteria in the Know Your Customer ("KYC") process;
- the progressive integration of ESG criteria in lending and rating policies;
- the use of management and monitoring tools for these risks, including specific questionnaires for activities with significant ESG issues;

- the training of financing business lines and control functions on the ESG risk framework;
- an operational control plan.

## ASSESSING EFFECTIVENESS

Acknowledging the challenges of assessing and addressing modern slavery and human trafficking issues, BNP Paribas remains committed to the review and enhancement of its own processes and policies, in order to continually improve their range and effectiveness.

### For employee-targeted policies

BNP Paribas tracks the effectiveness of its actions in this field through the percentage of employees contributing directly to the promotion of human rights who have received specific training. At the end of 2021, 93% of the employees who were assigned the module on how to address human rights in financing decisions of this specific training, had attended it. Since 2016, more than 20,000 employees of the Group have completed this training.

### For supplier-targeted policies

The number of CSR assessments of suppliers and sub-contractors that are conducted as part of requests for proposal, in particular those relating to categories of at-risk purchases, is a metric of BNP Paribas monitoring actions towards this type of stakeholder. In 2021, more than 3,700 ESG assessments were conducted, and more than 1,400 Sustainable Procurement Charters were signed by the Group's suppliers.

### For client-targeted policies

Opening and maintaining high-quality dialogue between the Group and the entities it finances or in which it invests is key to effective monitoring of a number of issues, including Human Rights, and can be an important driver towards positive change. The changes in exclusion and monitoring lists (i.e. the companies with which the Group does not wish to maintain commercial relations, or which are subject to increased monitoring, which may result from serious violations of human rights) is another indicator monitored by BNP Paribas. At the end of 2021, the exclusion list numbered 1,297 companies, and the monitoring list 183, for a total of 1,480 listed entities (against 1,446 at end 2020).

## PROCESS OF CONSULTATION

This statement has been prepared with the collaboration of relevant subject matter specialists, as well as appropriate members of the BNP Paribas CSR network, reaching through all functions, business lines and countries of the Group ([CSR taken to the highest level in the organisation](#)). The Group CSR and Group LEGAL Functions have coordinated this collaborative process over the past year, and in particular have consulted the designated contacts and experts for the United Kingdom and Australia.

## CONCLUSION

This statement has been used by BNP Paribas to establish the annual statements required by the Modern Slavery Act 2015 of the United Kingdom. The annual statement can be found on the ["Publications" page](#) of the Group website<sup>4</sup>.

This statement was approved by BNP Paribas' Board of directors on 22 February 2022.

Jean-Laurent BONNAFÉ

Director and Chief Executive Officer



Jean LEMIERRE

Chairman of the Board of directors



---

<sup>4</sup> BNP Paribas also publishes its statement on modern slavery and human trafficking on the Modern slavery statement registry, a platform launched by the British government in March 2021.

