

# ENVIRONMENTAL AND SOCIAL

## GENERAL PRINCIPLES

### INTRODUCTION

The banking sector and more globally the financial sector play a key role in the economy and can help drive the development of environmentally respectful and balanced economies and of inclusive and equitable societies.

In 2019, Societe Generale and its subsidiaries (the Group) decided to renew its corporate purpose: “Building together with our clients, a better and sustainable future, through responsible and innovative financial solutions”. In line with its purpose and its values (Team spirit, Innovation, Responsibility and Commitment), the Group has placed Corporate Social Responsibility (CSR) at the heart of the Group's strategy.

The Group is committed to continuously increase its positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from their activities, products and services.

Consideration of the economic, social, environmental and ethical impacts linked to its operations (direct operations and supply chain) and its commercial activities is a major focus of the Group's CSR ambition. These Environmental and Social (E&S) General Principles present the E&S framework applicable to the Group's activities, that may be linked to environmental and social impacts through the products and services delivered.

The Group strives to act in accordance with all applicable social and environmental laws, international treaties and conventions, in the countries where it operates.

Moreover, the Group embraces its pivotal role in promoting sustainability in its sphere of influence and across economic sectors and societies. To this end, it seeks to engage with all its stakeholders and has made voluntary commitments and joined collaborative initiatives in the banking and financial sector. By this approach, the Group seeks to meet the highest standards in the banking and financial industry. To achieve this ambition, it will keep nurturing a group-wide culture of E&S responsibility and strong common values.

### SCOPE OF THE E&S GENERAL PRINCIPLES

THE E&S GENERAL PRINCIPLES APPLY:

- to all countries where the Group activities may have an impact considered as significant on human rights or the environment.

- to all consolidated companies over which the Group exercises exclusive control. It covers all services and products of the Group, including, but not limited to, financial and banking services, notably corporate lending and dedicated financing, investment activities and asset management.

THE PURPOSE OF THIS DOCUMENT IS TO:

- list the types of E&S risks considered.
- present the standards and initiatives considered of reference for the Group's framework.
- describe the main aspects of the E&S Risk Management System (ESRM System) implemented in the Group's operations and governance, as formalized in the Group's normative documentation.

## ENVIRONMENTAL & SOCIAL RISKS

E&S issues cover a broad range of notions, which may be considered and understood differently in different cultures. For this reason, the Group is guided by the national regulations and the main international conventions regarding human rights and the environment to define the risks to be considered. The following definitions may be addressed more specifically in the E&S Transversal Statements and E&S Sector Policies, when necessary.

### ENVIRONMENTAL RISKS

Environmental risks cover temporary or permanent changes to the atmosphere, water, and land caused by human activities, which may result in material reversible or irreversible impacts. Risk intensity and gravity may vary according to the type of industry, scale, location and practices.

**The Rio Declaration on Environment and Development (1992) serves as a reference to identify the main issues related to the environment:**

- Climate change
- Air quality and air pollution
- Water resources and quality
- Sustainable land use
- Preservation of natural resources
- Biodiversity
- Waste limitation and treatment.

### SOCIAL AND HUMAN RIGHTS RISKS

Social and human rights risks may occur both in and around the workplace and can impact negatively workers and surrounding communities.

**The Universal Declaration of Human Rights (1948) and the fundamental conventions of the International Labour Organisation are the Group's references for social and human rights risks:**

- Forced labour and slavery
- Child labour
- Respect for indigenous peoples and their cultural heritage
- The right of ownership
- Discrimination
- Freedom of association
- The health and safety of persons
- The decent nature of working conditions, remuneration and social protection
- The right to privacy.

In addition, the Group considers governance and other ethical risks<sup>1</sup>, as part of the E&S and Governance (ESG) risks. These risks are managed in the frame of dedicated internal processes (including the Know

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<sup>1</sup> Embargoes and sanctions, Terrorism, Corruption and bribery, Resources appropriation, Tax evasion, Data protection.

Your Customer – KYC - process) based on principles of good business conduct and compliance with regulatory requirements.

## STANDARDS AND INITIATIVES

In order to manage the E&S risks potentially attached to its activities, the Group sets up the following internal standards as a complement to these E&S General Principles:

- **Three E&S Transversal Statements**<sup>2</sup> on transversal E&S issues describe the main reference framework and set out the commitment of the Group regarding Biodiversity, Climate and Human rights. While Transversal Statements are cross-sectoral, more specific requirements linked to sectoral issues are incorporated in the Sector Policies.
- **Eleven E&S Sector Policies**<sup>3</sup> define the E&S risk factors, the standards of reference and the specific criteria the Group intends to apply for its activities in sensitive sectors.

These standards were developed considering both the severity of the potential E&S harm and the significance of the Group's link to this harm and using as a reference the most relevant international and national standards as well as the initiatives supported by the banking and financial industry.

## INTERNATIONAL CONVENTIONS AND DECLARATIONS

The Group adopts and respects the values and principles enshrined in the following international conventions and declarations:

- **The Universal Declaration of Human Rights** and associated covenants (namely, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights).
- **The United Nations Declaration on the Rights of Indigenous Peoples** (UNDRIP), which is the most comprehensive international instrument on the rights of indigenous peoples.
- **The Fundamental Conventions of the International Labour Organization** (ILO)
- **The United Nations Framework Convention on Climate Change** and the **Paris Climate Agreement**.
- **The UNESCO Convention concerning the Protection of the World Cultural and Natural Heritage**.
- **The United Nations Sustainable Development Goals** (UN SDGs), a framework of 17 interconnected Goals to achieve by 2030 to address the global challenges, including those related to poverty, inequality, climate change or environmental degradation, and to build a better and more sustainable future for all.

## GUIDELINES

The Group also recognizes the value and is guided by the following standards, initiatives and best practices, among which:

- **The OECD Guidelines for Multinational Enterprises**, a comprehensive government backed international standard of Responsible Business Conduct (RBC), as well as the **OECD Due Diligence Guidance for Responsible Business Conduct** that provides practical support to enterprises on their implementation.
- **The UN Guiding Principles on Human Rights**, a set of guidelines for States and companies to prevent, address and remedy human rights abuses committed in business operations.
- **The IFC Performance Standards**, defining a framework for managing environmental and social risks related to activities.

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<sup>2</sup> See the Transversal Statements in Annex of this document

<sup>3</sup> The E&S sector policies are published on the Group website and are currently being updated

- **The World Bank Group General Environmental, Health and Safety (EHS) Guidelines**, a set of technical reference documents with general and industry-specific examples of good industrial practices.

## BANKING AND FINANCIAL INSTITUTIONS CSR INITIATIVES

The Group is an active member of various CSR initiatives involving the financial and banking sector which reference ESG risk management:

- **The United Nations Principles for Responsible Banking**, which provide the framework for a sustainable banking system, and help the banking industry to demonstrate how it makes a positive contribution to society.
- **The United Nations Environmental Program – Finance Initiative (UNEP-FI)**, a partnership between UNEP and the global financial sector to mobilize private sector finance for sustainable development.
- **The Equator Principles**, a risk management framework, adopted by financial institutions, for determining, assessing and managing E&S risks in projects. It is primarily intended to provide a minimum standard for due diligence and monitoring to support responsible risk decision-making.
- In addition, Lyxor and Société Générale Assurances are members of the **United Nations Principles for Responsible Investment (UN-PRI)**.
- The Group has also joined the **United Nations Global Compact** which encourages companies to integrate principles relating to human rights, working conditions and the fight against corruption.
- The Group is also a member of **E&S initiatives** focused on issues or sectors, which are listed in the Transversal Statements and Sector Policies.

## COMPLIANCE WITH APPLICABLE NATIONAL REGULATIONS

The Group strives to comply with all applicable regulations in the countries where it operates. This includes notably the 2017 French Duty of Care Law and the 2015 UK Modern Slavery Act.

## E&S RISK MANAGEMENT SYSTEM

**E&S risk management is fully integrated into the processes governing the conduct of the Group's activities. In coordination with the Group's business partners, salient impacts and associated risks are identified and assessed in order to be prevented or mitigated.**

### MAIN FEATURES OF THE GROUP ESRM SYSTEM

The Group integrates the assessment of E&S impacts and associated risks into its decision-making processes. To this end, a risk-based approach is implemented in the Group's activities **with the following steps**:

- **Identification**: The Group has developed tools and processes to help identify the banking and financial products and services, sector practices and countries where E&S risks are more likely to be encountered.
- **Evaluation**: When a risk has been identified, an evaluation is conducted, using the Group's E&S General Principles, E&S Transversal Statements and E&S Sector Policies as the framework for evaluation.
- **Action**: The evaluation may result in the need for a specific action. Depending on the E&S potential impacts and the associated E&S risks identified, various prevention or mitigation actions may be implemented, for example: in-depth monitoring of certain E&S topics, insertion of explicit E&S conditions in the Group contractual documentation, restriction, or even exclusion, of certain Group relationships.

## SCOPE OF THE GROUP ESRM SYSTEM

The application of the ESRM System is tailored to the type of link the Group may have with identified E&S risks. As a result, it can be conducted **at different levels depending on applicable processes**:

- **Corporate clients** of the Group: Central to the Group's assessment of E&S risks are the understanding of the E&S impacts associated with the client's activities, and the evaluation of the client's commitment, capacity and track record in managing these impacts. The Group's expectation is that the client should aim at avoiding – or at least reducing, mitigating or compensating for – negative E&S impacts.
- **Dedicated transactions** (or products) and services (with specific underlying assets, projects or activities): The Group applies the Equator Principles and its underlying standards to the transactions falling in the scope of this initiative. For other types of dedicated transactions and services, The Group implements E&S assessment procedures adapted to the type of transactions concluded and service provided.
- **Issuers of securities** held for own account or for third parties in the frame of investment activities or assets management as well as specific banking and financial products of the Group when they carry E&S risks by themselves.
- In addition to this granular approach, the Group has made long term commitments regarding its overall involvement in some sectors. These commitments (like reducing the share of coal in the financed energy mix) are managed at financing and/or investment **portfolios' level**.

## APPLICATION CRITERIA

For the different categories above, the E&S Sector Policies can provide **3 types of criteria**:

- **The E&S exclusion criteria** are intended to exclude certain types of corporate clients, issuers, dedicated transactions or services or financial products from the Group's activities.
- **The E&S priority evaluation criteria** are criteria addressing priority risk factors and for which a specific and systematic answer is requested as part of the evaluation process. For client's evaluation, if the criteria are not fulfilled, a positive evolution from the company current practices is expected in a reasonable timeframe and can be formalized through action plans or contractual clauses. For dedicated transactions on projects, alignment with the criteria is expected as part of the project development; for dedicated advisory services ahead of a project's development, the client's commitment to develop the project according to these criteria is evaluated.
- **The other E&S evaluation criteria** aim to identify the other risk factors of the sector, that will also be considered as part of the evaluation, and also to specify the best practices that the Group wishes to encourage.

## IMPLEMENTATION AND GOVERNANCE

Procedures are put in place progressively, as necessary, throughout the Group to ensure full integration of E&S risk management in the usual decision-making processes. The development of such processes takes into consideration the severity and the magnitude of the considered risks and the nature of the services or products provided by Business Units and entities of the Group.

Clients and dedicated transactions or services subject to an E&S Sector Policy presenting exclusion criteria are screened during the identification phase. Evaluation criteria are applied on perimeters defined by each Business Unit (on clients and dedicated transactions) depending on the inherent risk of their business or geography and nature of service provided.

The Group's decisions at the end of the identification and evaluation stages are made on the basis of the information available to it. The Group uses all reasonable means to ensure the quality and reliability of this information but accepts no liability whatsoever in connection with any such information.

The ESRM System is integrated in the Group's existing processes, in accordance with the following principles:

- Business Units implement the E&S risk management system and appoint dedicated E&S expert teams if necessary.
- Risk and Compliance Departments are acting as the second line of defense on E&S risks.
- The Group CSR team centralizes and coordinates the E&S framework evolution needs.
- The Group Responsible Commitments Committee (CORESP) validates the Group's CSR commitments and normative framework. It is chaired by the Deputy Chief Executive Officer supervising the control functions and mainly made up of the heads of the Compliance and Risk Departments, the Communications Department, the CSR Department and the heads of the Business Units and Services Units concerned, depending on the subjects dealt with.

The Group reports on the implementation of its ESRM System in various public documents including the Duty of Care plan, the Modern Slavery Act Statement and the Extra-Financial Performance Statement included in the Group's Universal Registration Document.

## DIALOGUE WITH STAKEHOLDERS

The Group is engaged in a dialogue with its internal stakeholders (employees, staff representative bodies) and external stakeholders (investors, shareholders, customers, nongovernmental organizations, civil society, etc.) in a way that it wishes to be constructive, aiming to anchor and reinforce the Group's CSR vision. The approach is described on the Group's website.

Regarding civil society organizations (CSO), in particular, the Group listens to and converses with CSO that alert it on E&S issues linked to its activities. Wherever possible, an internal enquiry is conducted and a documented response is provided, either in writing or at meetings, as appropriate. The Group uses the CSR Department to centralize requests or contacts from CSO or other stakeholders informing it about E&S issues linked to its activities.

## DISCLOSURE AND UPDATES

The present E&S General Principles, the E&S Transversal Statements and the E&S Sector Policies are designed to apply to any and all Group operations, including those initiated after their publication. Therefore, Societe Generale reserves the right to make changes at any time to the present E&S General Principles, Transversal Statements and Sector Policies. Updates are published on Societe Generale's website. These documents cannot be interpreted as contractual commitments. The E&S General Principles have been established in French and in English. The English version is a free translation.

## ANNEX 1: SOCIETE GENERALE GROUP'S TRANSVERSAL STATEMENT ON BIODIVERSITY

**As defined by the Convention on Biological Diversity, biodiversity encompasses the variability among living organisms. This includes diversity within species, between species and of ecosystems.**

Conservation of biodiversity, maintenance of ecosystem services and sustainable management of living natural resources are key aspects of sustainable development. The respect and preservation of biodiversity are internationally recognized by the Convention on Biological Diversity, the Convention on international Trade in Endangered Species of Wild Fauna and Flora, the Convention on the Conservation of Migratory Species of Wild Animals, the Convention on Wetlands (Ramsar) and the UNESCO Convention concerning the Protection Of The World Cultural and Natural Heritage and Man And the Biosphere Programme.

**Aware of the increasing pace of biodiversity loss worldwide, the Group is committed to the respect and preservation of biodiversity, one of the foundations of the Group's Environmental and Social Risk Management system and encourage its clients to do the same.**

Societe Generale and its subsidiaries (the Group) strive to comply with the legal and regulatory provisions of the territories in which it operates regarding the protection of species, habitats and ecosystems, and expects similar compliance from its suppliers and clients. Beyond this, the Group is aware of its role in preventing serious impacts on biodiversity linked to its purchases, products and services and uses the previously mentioned international standards as references for the protection of biodiversity.

To this end, the Group has developed Environmental & Social (E&S) General Principles and E&S Sector Policies to clarify the criteria implemented for each sensitive sector it is involved in. The E&S Risk Management system, which is described in E&S General Principles, is structured around three steps: identification, evaluation and prevention or mitigation of the E&S risks. Where relevant, specific criteria of the E&S Sector Policies tackle biodiversity protection.

To assist in the identification phase, the Group uses the World Database on Protected Areas of the International Union for the Conservation of the Nature, the Global Standard for the Identification of Key Biodiversity Areas and the IUCN Red List of Threatened Species. The Group applies the Equator Principles and its underlying standards to the transactions falling in the scope of this initiative, and particularly, where relevant, the IFC Performance Standard 6 which relates to Biodiversity Conservation and Sustainable Management of Living Natural Resources.

The Group excludes all dedicated products or services with material adverse impacts on the outstanding universal value of a cultural and natural UNESCO's World Heritage Site.

In order to ensure its E&S Risk Management system implementation and effectiveness, the Group assesses on a regular basis its level of implementation. This system is reviewed on a regular basis so as to be strengthened. The Group regularly reports on its E&S Risk Management system implementation, in its annual Universal Registration document and on its website. While being committed to ensuring the protection of biodiversity, the Group acknowledges the difficulty of preventing all risks of potential breach through its risk management processes. The Group therefore encourages transparency and dialogue with its stakeholders. The Group pays close attention to questions raised by its stakeholders concerning objective situations or risks on biodiversity related to its activities.

Furthermore, the Group is engaged in dialogue and cooperation with relevant public and private stakeholders to develop common commitments, new methodologies and tools enabling better identification and management of potential impacts on biodiversity. The Group has joined the Act4Nature initiative which is a French collective initiative of global actors aiming at encouraging biodiversity-related commitments and generating momentum for progress around the theme.

The Group is also a member of the Club B4B+ (Business for Positive Biodiversity), through which it contributes to the development and industry-wide dissemination of the Global Biodiversity Score (GBS™), a consensual open source model to measure the biodiversity impact for financial activities. The objective of the Club B4B + is to play a role of incubator of this indicator and of the associated methodology for biodiversity footprint evaluation.

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## ANNEX 2: SOCIETE GENERALE GROUP'S TRANSVERSAL STATEMENT ON CLIMATE

Anthropogenic climate change is a major threat for the 21st century, as human-induced emissions of greenhouse gases and land use changes will lead to significant global warming beyond sustainable levels if left unchecked.

Climate change is internationally recognized and defined by the conclusions of the 1992 Rio Conference, the annual United Nations Framework Convention on Climate Change Conferences of Parties (UNFCCC COP), and in particular the outcome of COP21 in 2015, the Paris Agreement. Its objectives are to hold the increase in the global average temperature to well below 2°C above pre-industrial levels and to pursue efforts to limit the temperature increase to 1.5°C, recognizing that this would significantly reduce the risks and impacts of climate change.

**Societe Generale Group is committed to align its activities with the goals of the Paris Climate Agreement.**

Since 2015, governments have acted in response to the Paris Climate Agreement, with some of these actions directly relevant for the finance sector, such as the European Union's Green Deal and the Action Plan on Sustainable Finance. The Group promotes an appropriate regulation of sustainable finance in Europe, directly or through its participation to trade associations (in particular the French Banking Federation and European Banking Federation). More recently, in the context of COVID crisis, the Group joined the Green Recovery Alliance initiated by the EU Parliament, recognizing the importance of aligning economic recovery with the environmental transition.

In addition, voluntary frameworks have been developed to clarify the role of the banking sector in accompanying the energy transition and promoting climate change mitigation and adaptation. In particular, the Group supports the Taskforce for Climate-related Financial Disclosure (TCFD). At the COP24 in 2018, the Group signed the Katowice Commitment which served as the basis for the 2019 Collective Commitment on Climate Action signed by 37 financial institutions, alongside the Principles for Responsible Banking of the United Nations Environment Programme Finance Initiative (UNEP-FI). The Group also joined the Carbon Pricing Leadership Coalition, the Climate Bond Initiative and the Green Bond Principles, as well as the Poseidon Principles for responsible shipping and the Hydrogen Council.

Climate risk management is a key element of the Group's Environmental and Social (E&S) Risk Management system:

- E&S Sector Policies have been put in place and are frequently updated, most of which have a strong climate relevance, especially regarding the energy, transport or forestry sectors.
- In addition to the sectors covered by E&S Policies, the other most carbon intensive sectors are currently being considered within the development of methodologies for alignment of the Group's portfolios with the goals of the Paris Climate Agreement.
- Climate risk factors are now integrated in the risk management governance framework for credit. They are considered in terms of transition risks, physical, litigation and legal risks, as defined by the TCFD.
- The Group is set to remain a leading bank for the energy transition. It provides Positive Impact products and services and has pledged to raise financing for the energy transition. The Group is also

determined to progressively reduce its exposure to the key emitting sectors: it has thus started to phase out coal financing and decrease its exposure to oil and gas production.

- Apart from financing, other activities of the Group, such as asset management and insurance, have also developed climate policies.
- Regarding its own operations and direct climate impact, the Group has also set up a number of environmental policies and levies an internal carbon tax.

Climate issues are now a key area of focus of the Group's governance and strategy. The Group's climate strategy is piloted by the General Management and reviewed by the Board of Directors. Since 2017 climate-related risks have been monitored by the Group Risk Committee and, since 2019, strategic climate-related orientations (such as exit from the coal sector) have been monitored by the Group's Responsible Engagement Committee (CORESP).

The Group publishes its climate-related efforts in its annual Universal Registration Document, and on its website, as well as in a dedicated annual climate report.

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## ANNEX 3: SOCIETE GENERALE GROUP'S TRANSVERSAL STATEMENT ON HUMAN RIGHTS

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

**Societe Generale Group is committed to the respect and promotion of human rights, as one of the foundations of its E&S Risk management system.**

The Group supports international initiatives aiming to clarify the role of companies, especially from the banking sector, in the respect and promotion of human rights. The Group thus supports the United Nations Global Compact and the Principles for Responsible Investment and is committed to implementing the OECD Guiding Principles for Multinational Corporations and the UN Guiding Principles on Business and Human Rights of June 16, 2011. The Group recognizes the fundamental role of states and governments in defining legal frameworks for the protection and full exercise of human rights. The Group thus strives to comply with the legal and regulatory provisions of the territories in which it operates with respect to human rights. The Group is also aware of its role in preventing serious human rights breaches, both in its activities and for the risks directly associated to its purchases or its products and services. Where local laws and regulations are considered insufficient, the Group refers to the previously mentioned international standards of respect and protection of human rights. The Group has enshrined the respect and protection of human rights in its Code of Conduct and in its E&S General Principles. The Group develops E&S Sector Policies, processes and operational procedures to implement these commitments towards human rights.

With respect to human rights, our E&S Risk management system is implemented in three main areas:

- **Respect of the human rights of the Group's employees and social partners.** This aims to guarantee to all the respect of human rights in the working context. For example, the Group is committed to fighting all forms of discrimination and harassment at work. This commitment has been reinforced in 2019 by the renewal of the agreement with UNI Global Union.
- **Respect of the human rights of the Group's suppliers and in its supply chain.** This aims first to guarantee suppliers that their human rights will be respected in the business relationship, and second to commit to manage the Group's purchases and procurement so as to limit the risk of serious human rights breaches.
- **Respect of the human rights as part of its products and services.** This aims to guarantee the respect of its individual and institutional clients' human rights, especially those relating to privacy. It is also about preventing serious human rights breaches directly associated with the Group's products and services. For example, within the scope of dedicated transactions and services, the Group carries out human rights assessments that include respect of workers' rights, local communities' consultation and the rights of indigenous people.

On each of these areas, the E&S Risk management system is structured around three steps: identification, evaluation and prevention / mitigation of the E&S risks. In order to ensure its implementation and effectiveness, the Group assesses on a regular basis its level of implementation. The E&S Risk Management system is also reviewed on a regular basis so as to be strengthened.

While being committed to ensuring the respect and protection of human rights, the Group acknowledges the difficulty of preventing all risks of potential breach through its risk management processes. The Group therefore encourages transparency and dialogue with its stakeholders. The Group pays close attention to public questions raised by its stakeholders concerning objective situations or risks of serious human rights breaches related to its activities. The Group has also set up a whistleblowing mechanism, accessible via [www.societegenerale.com](http://www.societegenerale.com).

The Group also listens to public and private stakeholders who challenge the content of its E&S Sector Policies. It participates in forums and sector initiatives to promote the respect of human rights and to deepen the understanding of the issues that arise for the financial sector in that area.

As part of its obligations under the Section 54 of the Modern Slavery Act 2015, the Group publishes on its website an annual Statement on Modern slavery and human trafficking, highlighting the main actions implemented to prevent their occurrence.

On the other hand, in response to 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 to identify and prevent serious breach of human rights as well as fundamental freedoms and the environment. The Group presents the key elements of this plan and its effective implementation in its annual Universal Registration Document.

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