

BNP PARIBAS HUMAN RIGHTS RISKS MAPPING



BNP PARIBAS

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INTRODUCTION

BNP Paribas complies with the internationally recognized standards concerning Human rights. The Bank ensures that these rights are respected in all its activities, in all the countries in which it operates and in its relations with its employees, supply chain, customers, and the communities in which it operates. BNP Paribas supports the *United Nations Guiding Principles on Business and Human rights*, in accordance with the "Protect, Respect, Remedy" framework.

The Bank recognizes its own responsibility as an employer, provider of financial services and purchaser. Its objective is to ensure that, under no circumstances, shall it be involved in Human rights violations, either directly or indirectly. Furthermore, as proof of its commitment and determination, BNP Paribas has chosen to follow the recommendations set out in the *UN Guiding Principles Reporting Framework* launched in February 2015.

In 2012, the Group's Executive Management signed the [BNP Paribas Declaration on Human Rights](#) committing the Bank to ensuring the respect of Human Rights within its sphere of influence which includes employees, suppliers, customers and communities. Besides this commitment at the highest level of governance, BNP Paribas has structured its actions and processes on Human Rights through the implementation of both Group wide policies on this matter (e. g. BNP Paribas' [Code of Conduct](#), the [Agreement on Fundamental Rights and Global Social Framework](#) signed with UNI Global Union in 2018...), specific processes and guidelines tackling BNP Paribas operations (e. g. [Responsible Business Principles](#), [Financing and Investment Policies](#), and lists of exclusion and monitoring for clients, [Sustainable Sourcing Charter](#) for suppliers, respect of the [Equator Principles](#) for local populations...), the involvement of its internal network of CSR referents and sustainability experts, and the will to engage in fruitful exchanges with stakeholders and civil society on this subject.

INCREASING CORPORATE HUMAN RIGHTS OBLIGATION (MODERN SLAVERY ACT, FRENCH LAW ON THE DUTY OF CARE OF MULTINATIONAL COMPANIES) : A CONTINUOUS IMPROVEMENT FOR BNP PARIBAS

Local legislations have become more stringent, with examples including the UK *Modern Slavery Act* (2015), and the French *Corporate duty of care law for parent and subcontracting companies headquartered in France*, voted on 21 February 2017. 2019 saw the coming into force of the Australian *Modern Slavery Act* and of the Dutch *Child Labour Due Diligence Law*. Other countries are currently in the process of drafting and passing similar regulations, making the matter of Human Rights more material than ever before for increasingly liable companies.

Since 2010 BNP Paribas has implemented and regularly improved several processes to manage its

ESG risks. That's why, for BNP Paribas, the French duty of vigilance law and other similar ones, are a new step but not a new approach.

It is a continuous improvement that allows BNP Paribas to strengthen its processes and especially, to ensure its generalization and its robustness (i.e. document each action done as part of the ESG risk management process is to be improved, as a process).

In the framework of this law, BNP Paribas has reinforced its risk mapping and processes when needed these last 4 years.

THE GROUP'S REPORTING AND DISCLOSURE TOOLS

BNP Paribas complies with the internationally recognized standards concerning Human Rights. It has therefore made special efforts since 2016 to comply with the recommendations of the *UN Guiding Principles Reporting Framework* released in February 2015: See BNP Paribas' Human Rights reporting included in the Group's *Universal Registration Documents* (Chapter 7, Commitment 8, "Combat Social Exclusion and Support Human Rights"). Moreover, BNP Paribas' Human Rights reporting complies with the Principles of the UN Global Compact.

The Bank ensures that these rights are respected in all its activities, in all the countries in which it operates and in its relations with its employees, supply chain, and customers. It has deployed screening tools specific to each of these stakeholders to do so.

1. "SALIENT" HUMAN RIGHTS ISSUES FOR BNP PARIBAS

The Group focuses its action on the most salient issues for banks and financial institutions. According to the UN Guiding Principles Reporting Framework, salient issues are those which present the most risks in the Company's activities or in its business relations. BNP Paribas has identified four salient issues:

	SALIENT RISKS
Banking & Financial Operations	1. Nondiscrimination in access to financial services
	2. Right to privacy (protection of data subjects' data)
Financing & Investment Operations	3. Workers' rights
	4. Rights of local communities

These issues were identified through a combination of different sources:

- An internal procedure was conducted to identify all direct Human Rights risks (employees, retail customers and suppliers), as well as indirect risks on the Group's loan portfolio;
- The Bank took part in several working groups (Thun Group, Businesses for Human Rights – EDH¹ –, Advanced Club and Human Rights Club of Global Compact France, UN Businesses and Human Rights Forum, etc.) and has taken the opinions of stakeholders into account². BNP Paribas also gathers information on emerging issues and Human Rights-related risks through thematic watches, issued on monthly basis and shared with a network of over 70 internal correspondents³.

Please also read our Duty of Care Statement ([2020 Universal Registration Document](#) on pages 615 to 618).

¹ Entreprises pour les Droits de l'Homme, in French.

² For more information about how BNP Paribas performed its materiality analysis, please refer to [2020 Universal Registration Document](#) (p. 624)

³ See an example of a Human Rights newsletter in the Annexes.

2. BNP PARIBAS' HUMAN RIGHTS RISK MAPPING AND SCREENING TOOLS AND COVERAGE OF THE RISKS

A. RELATED TO BNP PARIBAS' EMPLOYEES

The Group wants to foster a stimulating work environment in which every person is treated fairly. In particular, the Group places an emphasis on respect, the need to apply the highest standards of professional behavior, and the rejection of all forms of discrimination. The Group also ensures the safety and security of people in their workplace.

When it implemented its vigilance plan, BNP Paribas ensured that there was adequate coverage of all salient risks (please refer to the introduction for the list of covered risks) as well as formalising them in existing Group HR policies.

The Group's diversity and inclusion policy and remuneration principles reaffirm the principle of non-discrimination in the recruitment and professional development of employees up to the Company's highest levels. These policies are supported by the Group HR control plan as well as by a specific alert procedure on discrimination issues via "Discrimination advisers", who can be called upon, in the countries where they exist, by any employee who believes he/she is a victim of discrimination.

- BNP Paribas has also signed the 10 Principles of the International Labour Organisation's Disability Charter, designed to promote the employment and working conditions of people with disabilities. By means of the Global agreement (signed in September 2018 with UNI Global Union), each of the Group's entities has undertaken to implement at least one of 10 commitments from the aforementioned charter.
- As part of the UN Women HeForShe programme, BNP Paribas is especially committed to advancing gender equality by beginning to better balance male and female representation in roles that historically had a preponderance of female (HR) or male (Global Markets) employees.
- BNP Paribas also supports the United Nations LGBTI Standards of Conduct, unveiled in September 2017 to combat discrimination against LGBTI people at work.

The update of the Code of conduct in 2016 strengthens the Group's commitment to combating harassment, including sexual harassment. The Human Resources Department also introduced an internal procedure in 2018 on how to deal with reports of harassment. Under the Global agreement, this will be implemented in all Group entities, together with measures to support victims.

The European Social Charter, from which derives the European agreement on the prevention of stress at work (which has applied since 2017), the programmes related to the prevention of psychosocial risks and stress at work, the commitment on maternity/paternity, the charter on the balance of professional life and personal life in France and new ways of working all contribute to a better balance of work patterns.

In 2018, BNP Paribas also updated its HR personal data protection policy to apply the provisions of the General Data Protection Regulation (GDPR), which came into force on 25 May 2018, and carries out awareness-raising activities for employees in the territories where the GDPR is applicable.

Occupational risk prevention programmes and occupational health and safety policies are adapted to the specificities of the Group's different businesses and described in more detail in BNP Paribas *Universal Registration Documents* (See "Good place to work" and responsible employee management, Commitment 5).

The policies and actions already undertaken by Human Resources will continue to be implemented and monitored over time.

Agreement on fundamental rights and global social framework:

2018 marked a decisive turning point in the Group's social responsibility strategy with the signature of a Global agreement with UNI Global Union, the International Trade Union Federation of the service sector. This agreement on fundamental rights and global social framework (Global agreement) addresses seven topics⁴ that all contribute to improving quality of life and working conditions for employees, thereby helping to promote a more equal society and inclusive growth.

The concrete, ambitious commitments in this agreement must be applied to all Group employees progressively from 2019 for certain measures and by 2021 at the latest for others. This period is required for subsidiaries to tailor their policies and provide the resources to implement the resulting social improvements in some regions.

During 2020, the Global agreement implementation continued, helping to consolidate fundamental rights at work and establish a common social foundation for employees in all 68 countries.

On modern slavery and human trafficking (pursuant to the UK and Australia Modern Slavery Acts):

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 categorized the banking sector and its employees, most of them being highly skilled professionals, as particularly exposed to these practices.

B. RELATED TO BNP PARIBAS' SUPPLIERS & THIRD PARTY

i. Suppliers – A new Risk Mapping, managed by Group Purchasing Department

Three French banks (including BNP Paribas) and a French certification agency (AFNOR) have worked over 2018 on a risk mapping tool, designed to better identify & manage the ESG risks of their expense categories.

⁴ Human rights, social dialogue and trade union rights; Corporate social responsibility; Employment management and change management; Gender equality in the workplace; Promoting diversity and inclusion; Preventing and combating psychological and sexual harassment; Health and quality of life at work.

The tool covers around 100 purchase categories and provides an analysis of risks based on 13⁵ ESG risk criteria or issues (pertaining to ethics, environment, work conditions and human rights aspects).

The risk is scored on four levels of risks and is determined based on the severity and the likelihood of occurrence. The tool provides also a country risk's analysis, covering 170 countries on the 13 ESG identified risks.

This allows identifying the risk on a category in absolute terms or depending on the country of sourcing. The tool is available both in a French and an English version. See **Annexes** for examples.

On top of this work of mapping its risks, BNP Paribas expects all suppliers to commit to respecting its [Sustainable Sourcing Charter](#), drafted jointly with three other French banks, and made available to the Procurement teams. This Group Charter completes existing charters adapted to local conditions.

It includes both the commitments of the signatories to their suppliers and the commitments expected from suppliers in terms of ethics, human rights, respect for the environment and progress, including with regards to subcontractors. Since its publication in 18 over 2,200 supplier charters have been signed (900 at end 2020 alone).

BNP Paribas includes questions relating to the extra-financial issues in calls for tenders, in accordance with the BNP Paribas *Sustainable Sourcing Charter*. In 2020, 2,301 supplier ESG assessments were conducted by the Procurement teams in the Group, during calls for tenders.

In parallel, the Group Strategic Sourcing, the central team of the Sourcing filière, continues its work to improve the risk assessment of the suppliers, through the implementation of specific questionnaires for categories with high ESG risks, in the context of calls for tenders.

Besides, Sourcing teams receive a mandatory training on Human Rights and Business (freely available for BNP Paribas employees). At end of 2020, 89% of the eligible employees in the Group Strategic Sourcing Function had passed the dedicated e-learning.

In France, BNP Paribas is a signatory to the Responsible Supplier Relations Charter promoted by the Business Mediation body of the French Ministry of the Economy and Finance, which notably offers recourse to an independent internal mediator.

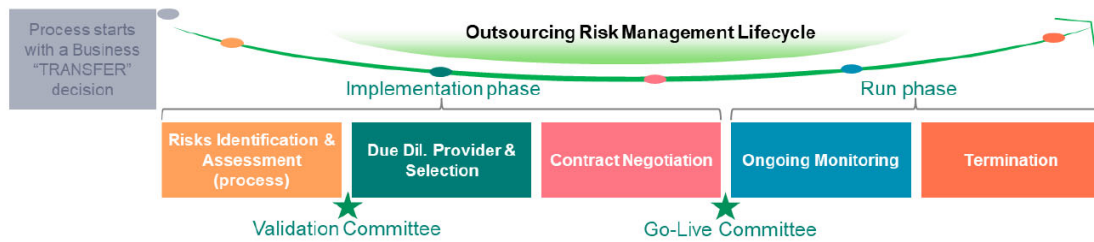
ii. Third Party Risk Management (TPRM) – a complementary approach, developed by Group Risk Department

Group Risk Department pursues its global effort to strengthen the third-party risk management (TPRM). The Group Policy, procedure and control plan have been published in 2020 in line with new EBA Outsourcing guidelines. This TPRM framework is being implemented in the whole Group.

⁵ Fraud & Corruption, Personal data protection, Property rights & Patents, Natural resources depletion, Pollution (water, air, soil), Biodiversity loss, Climate change and greenhouse gases, Waste & End of life management, Health & Security, Working conditions & Freedom of association, Discrimination, Forced labour & Modern slavery, Child labour

Every Beneficiary maintain an updated Register containing information on all Outsourcing Arrangements, whether in progress or terminated for an appropriate period considering the local law, according to Group RISK and local requirements.

A Group tool has been implemented and is being populated to manage the arrangement's inventory/Register, enabling notably to follow and mitigate the concentration risk and economic interdependencies, harmonize the frequency and the content of Outsourcing risk reporting that shall be formally reviewed at relevant level. The register contain among other things whether or not the arrangement is high risk and if a resolution proof clause has been provided.



C. RELATED TO BNP PARIBAS' RETAIL INDIVIDUAL CLIENTS

BNP Paribas identified two salient human rights-related risks that its retail individual clients may be subjected to :

- Discrimination in access to financial services;
- Right to privacy violations

The Group considers that sustainable economic development promotes wider access to fundamental rights. For this reason, we have facilitated **access to our products and services for clients in particular situations** (e.g. fixed term employment contract, clients presenting an increased risk of health issues (insurance)) as well as for clients in emerging markets (e.g. deployment of microfinance)⁶. In the same vein, specific measures have been taken for customers in vulnerable situations due to financial situation or disabilities, such as the development of non-discriminating products, the access to the agencies for disabled people, etc.

Furthermore, BNP Paribas' wish to be exemplary in the **protection of customers' private data** has been translated into a Group policy to protect personal data, along with the deployment of specific e-learning programs⁷.

D. RELATED TO BNP PARIBAS' CLIENTS ACTIVITIES (LARGE CORPORATES)

Prior to the coming into force of the French Duty of Vigilance law (2017), BNP Paribas had implemented specific tools and assessments relative to human rights risks linked to its large corporates' clients. For instance, in 2015, BNP Paribas launched the HRRRA (Human Rights Risk Assessment) project, which aimed at identifying risks regarding Human Rights by sector and by country. Among lessons learnt in the implementation of the project (now discontinued and replaced by the management of BNP Paribas Vigilance Plan, pursuant to the corresponding law) is the fact that human rights risks are diffuse and cross-cutting, although certain sectors are particularly highlighted. That is why in 2016 and 2017, the Group introduced a program to strengthen and update the "Human Rights" criteria in its risk management process. To this day, it continues to be updated, in order to reflect the evolution of the legal environment (e. g. UK and Australia Modern Slavery Acts, French Duty of Care Law) and to be perfected in a logic of continuous improvement.

This led to the identification of both severe risks (including health and safety and environmental issues, on top of human rights issues) and high risk sectors among the ones financed by the Group. They have been taken into account during the processes' revision under the framework of the duty of care law, notably via additional policy and analysis to our existing process since 2018 (see below).

In line with its CSR commitments, the Group has included in its vigilance approach the risks of serious violations of human rights and fundamental freedoms, and of harm to human health and safety and to the environment, and the following issues in particular:

- issues related to human rights and fundamental freedoms: child labour, forced labour and

⁶ More information on the actions and programs implemented by the Group to provide financial services to vulnerable populations in [2020 Universal Registration Document](#) (Products and services that are widely available - p. 587/9).

⁷ More information on the actions and programs implemented by the Group to protect data privacy in [2020 Universal Registration Document](#) (Cyber Security and Technology - 462/3 ; Right to privacy - p. 591).

human trafficking, non-compliance with the rights of local communities, freedom of association and collective bargaining, exercise of the right to strike, discrimination, failure to respect the rights of local communities, harassment, unfair wages and excessive hours of work;

- issues related to human health and safety: workplace and consumer health and safety;
- environmental issues: climate risks, air pollution, water pollution, soil pollution, scarcity and depletion of commodities, water scarcity, erosion and soil depletion, waste management, greenhouse gas emissions, deterioration of ecosystems and biodiversity.

Risk Mapping to which clients are exposed covering all business sectors and all the countries where they are located

To ensure that the existing system is adapted to the requirements of the French Duty of Care law, BNP Paribas uses mapping of the risks to which its clients are exposed that covers all business sectors and all the countries where the clients' legal entities are located:

- for each business sector, the salient risks related to human rights and fundamental freedoms, personal health and safety and the environment were defined according to a methodology for rating the level of sensitivity and occurrence of each risk, that is based on the United Nations Guiding Principles reporting framework. The level of risk inherent in each business sector was then determined based on the presence of salient risks;
- a level of environmental and social risk was defined for each country where the clients of the Group operate on the basis of reference sources from recognised international organisations and NGOs, such as the International Labour Organisation, the World Bank, the United Nations Environment Programme, Human Rights Watch, Transparency International, and the World Resources Institute.
- The risk levels inherent in the sectors and countries where the Group operates were then combined to take into account the clients' legal entities with a high level of environmental and social risk.

As a result of this mapping exercise, depending on the level of risk exposure of the Group clients' legal entities, extensive vigilance measures were decided by the business lines and functions concerned and validated by the Group Supervision and Control Committee such as new dedicated sector questionnaires for more in-depth due diligence, in order to reinforce the already existing processes.

On top of this, at the end of 2018, the Group published its [Responsible Business Principles Charter](#) for its customers, thus reaffirming BNP Paribas's expectation to engage with customers whose business practices demonstrate a high level of governance and responsibility with respect to human rights, fundamental freedoms, human health and safety, and the environment.

In accordance with its ESG risk management system, BNP Paribas takes ESG criteria into account in its decision-making processes:

- these criteria are included in the Know Your Client (KYC) process and in 22 specific credit and rating policies;
- in questionnaires allowing an in-depth analysis of companies active in countries and sectors identified as sensitive in terms of human rights and respect for the environment. These grids are an addition to the ESG risk management system already applied by the Bank (including

sector-specific policies, CSR screening and specific credit policies).

- lastly, the deployment of an ESG action plan (see chapter 2.4 Internal control – Risk and permanent control) enables an even more in-depth integration of extra-financial issues into all our products and services.

Besides, throughout 2020, BNP Paribas has boosted training on ESG risk management systems for the financing business lines and control functions (Risk and Compliance). In addition to the e-learning of the CSR sectorial policies available in 8 languages, 12 digital sessions were organised to strengthen understanding of ESG risks and the associated management tools. In this way, the Group's CSR Function has trained 668 people from sales and RISK teams. Since 2012, more than 35,000 employees have taken e-learning modules on the sectoral policies.

Finally, BNP Paribas strengthened its ESG system by rolling out a multi-year programme (the ESG Action Plan) in 2020 under the joint responsibility of the Head of Corporate Commitment and the Head of Risk. This programme will provide in particular for a systematic ESG assessment of clients as part of the credit process, in order to identify corporates whose weak ESG risk management performance could generate credit, investment or reputation risks, as well as negative environmental and social impacts. The questions asked and their weighting in the assessment will be adapted to the challenges of each business sector.

E. RELATED TO BNP PARIBAS ASSET MANAGEMENT ACTIVITIES

Asset Management activities include client mandates and open ended-investment funds.

With respect to client mandates, BNP Paribas has no leverage on the decision its clients may take concerning asset management mandates, and is not responsible for the use of these assets. However, starting in 2020, BNP Paribas Asset Management has been applying by default its Responsible Business Conduct Policy to client mandates and clients now have to choose to opt out of the policy if they so wish.

BNP Paribas Asset Management open-ended funds may be exposed to human rights issues. We apply ESG criteria to all of our open-ended funds with the help of external research providers, i.e. to all firms included in our investment universe.

In addition to this analysis, which complements our financial analysis, BNP Paribas Asset Management applies a formal framework based on the UN Global Compact's ten principles, which includes a review of human rights and labour practices. These principles are complemented by rules for investing in sensitive sectors or products through our sector-specific policies. We use a third-party external research provider to help in identifying companies that do not meet the UN Global Compact's ten principles and this approach may lead to the exclusion of companies that do not meet the minimum standards defined by our framework. We engage with excluded companies to monitor any progress that could lead to the reconsideration of their status. This framework is set out in our Responsible Business Conduct Policy.

In parallel, if there is a lack of transparency on ESG matters, BNP Paribas Asset Management may abstain from approving the financial statements at the Annual General Meetings. The details are in our Governance and Voting Policy.

Because of this continuous process, we consider that 100% of our asset management activities exposed to human rights risks have been assessed within the last 3 years.

In addition, BNP Paribas Asset Management participates in a number of initiatives to

- a. help it keep informed of emerging issues related to human rights,
- b. build knowledge and capacity within the investment community on human rights issues, and
- c. allow it to do collective engagements with companies on these issues.

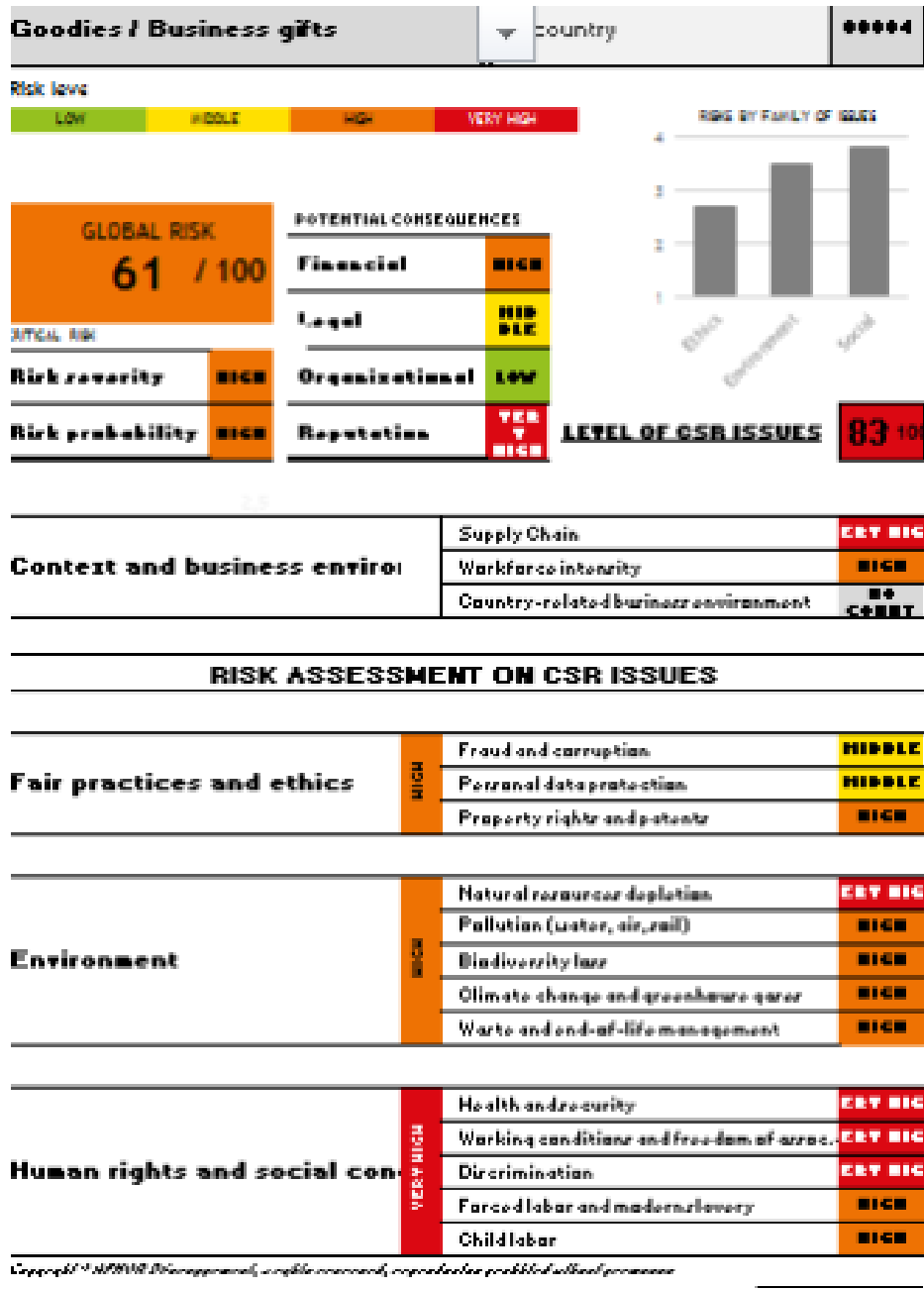
As an example, BNP Paribas Asset Management is a member of the Global Network Initiative (GNI), a unique partnership between corporations, investors, human rights organisations and academics to uphold freedom of expression and privacy when ICT sector companies are faced with governmental demands that may infringe these fundamental rights.

Every two years, corporate members go through a voluntary independent assessment process to provide assurance that they are making good faith efforts to implement the GNI Principles on freedom of expression and privacy. The process includes confidential discussions of specific cases, including situations where companies successfully pushed back against unreasonable government demands as well as cases where corporate decision-making was less than ideal. BNP Paribas Asset Management Head of Stewardship for the Americas, Adam Kanzer, is also the co-founder and board member of the GNI.



ANNEXES

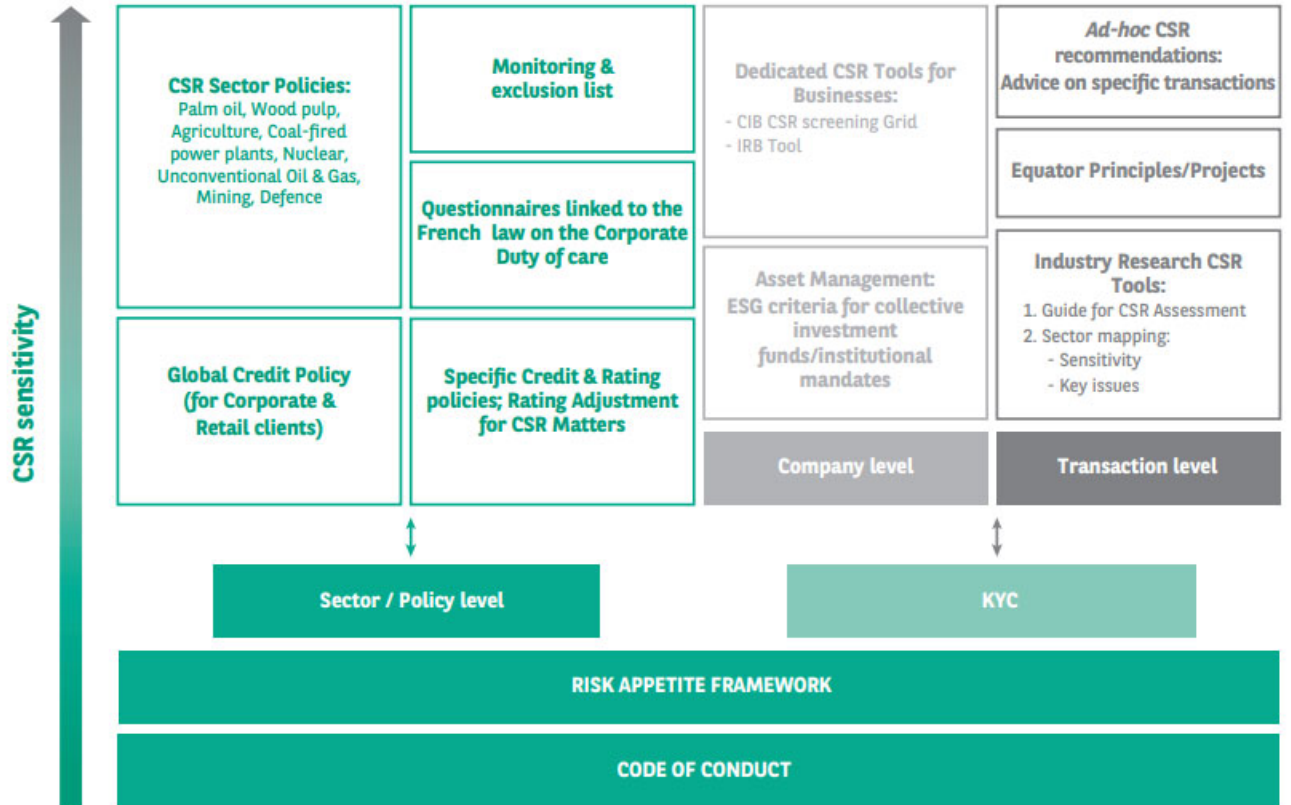
Example 1: Category ESG risk synthesis (for *Goodies/Business Gifts*)



Example 2: Detailed analysis of risks

Detailed analysis	
Risk level	LOW MIDDLE HIGH VERY HIGH
Context and business environment	
SUPPLY CHAIN <i>- examples and list</i>	VERY HIGH
WORKFORCE INTENSITY <i>- Low turnover already and low education rate</i>	HIGH
COUNTRY-RELATED BUSINESS ENVIRONMENT <i>- No existing context</i>	NO COUNTRY
Fair practices and ethics	
FRAUD AND CORRUPTION <i>- According to Transparency International, the rate of perception of acceptance remains low in the sector - Focus to comply with the opposite demands on alternative solutions demands: BAKS, MICE, REACH, etc working, etc.</i>	MIDDLE
PERSONAL DATA PROTECTION <i>- Focus by municipalities of associated clients to reach additional standards of data security - Monitor banking data theft from bank and partners, for example</i>	MIDDLE
PROPERTY RIGHTS AND PATENTS <i>- Inclusion and assessment of licensed products or works - Focus to comply with property rights and copyright - Focus to respect the rights of authors, artists, performers and producers</i>	HIGH
Environment	
NATURAL RESOURCES DEPLETION <i>- Increase dependence of natural resources: depletion of stocks of fish, minerals and reserves, security of water, deforestation, etc. need to multi-qualify</i>	VERY HIGH

ESG & Human Rights Risks Screening Tools Mapping⁸:



⁸ Please also refer to BNP Paribas [2020 Universal Registration Document](#) (p. 565)

LITIGATION

Uniqlo, Inditex, Skechers among companies accused of benefiting from Chinese forced labor in new complaint

The Fashion Law – 15/04/21 (read full article [here](#))

Several companies accused by civil society organizations and expert reports to have benefitted from Uyghurs forced labor through their supply chains are now facing legal complaints before French courts. Uniqlo (property of Fast Retailing), Inditex (the parent group of, among other brands, Zara, Pull & Bear, Massimo Dutti and Stradivarius), SMCP (Sandro, Maje, Claudie Pierlot, De Fursac) and Skechers were thus targeted on the ground of their possible involvement “in the forced labor imposed on the Uyghur population”.



These brands and companies have been specifically accused of “concealment of forced labor and crimes against humanity” (a qualification that the Uyghurs oppression has yet to be associated with at the global stage, and that is not, as of today, recognized by the French government and laws), in the complaint filed by Sherpa, the Collectif Ethique sur l'étiquette, the Uyghur Institute of Europe and an Uyghur victim. The accusations thus differ from the ones formulated [in an earlier complaint filed against Nike in February](#), before a French court as well (deceptive business practices and complicity in the concealment of forced labor). In a reactive statement, the company rejected the allegations, declaring that it was “committed to ethical and responsible manufacturing”. Following [the backlash from Chinese netizens and consumers](#) that welcomed the strong-worded

FORCED LABOR

US will seize all Top Glove imports after finding “sufficient evidence” of forced labor

CNN – 30/03/2021 (read the full article [here](#))

After a month-long investigation, U.S Customs and Border Protection (CBP) ordered personal at all U.S ports of entry to seize disposable gloves manufactured by Top Glove Corporation Bhd upon their arrival. Indeed, the Federal Agency declared having found sufficient evidence that the Malaysian company was using convict, forced and indentured labor to produce its gloves. Since the start of COVID-19 pandemic, the global



demand for medical gloves have strongly increased, with [60% of the world's supply coming from Malaysia](#). This extra demand has necessarily put a spotlight on the country's businesses and how they treat their workers. In July 2020, CBP issued a [Withhold Release Order](#) (WRO) based on reasonable, but not conclusive, information that modern slavery practices were part of Top Glove's production

