

# RESPONSIBLE PURCHASING CHARTER

## Dexia Group approach / Methodology

This charter on Social, Environmental and societal Responsibility (SER) is part of the Dexia Group's sustainable development approach implemented since 2001.

Dexia wishes to involve its suppliers and business partners in the implementation of vigilance measures within the framework of their Corporate Social Responsibility (CSR) processes.

The purpose of this charter is to inform suppliers and business partners of :

- On their reciprocal commitments in terms of responsible purchasing;
- On the expectation that suppliers and partners will respect the fundamental principles of the United Nations Global Compact, in the field of human rights, working conditions, the environment and the fight against corruption, and also, on the United Nations Guiding Principles on Business and Human Rights, which specify the modalities of respect for human rights by companies.

It applies to :

- To all suppliers of the Dexia Group, in particular at the time of each new call for competition or signature of a contract.
- To any business partner intervening within the framework of a partnership and acting in the name and on behalf of the establishment.

The capacity of suppliers to commit and to translate these commitments into adapted practices is part of the evaluation criteria retained by Dexia throughout the business relationship.

The scope of this charter corresponds to the consolidated financial scope of Dexia.

## Commitments of suppliers and business partners

### 1. Human rights and labor law

Dexia carries out its activities with respect for human rights. A breach of this commitment could tarnish Dexia's reputation and give rise to administrative, legal or criminal sanctions.

To protect itself from any indirect risks linked to the activities of its suppliers, Dexia asks its suppliers and business partners to commit to respecting and applying the United Nations guidelines on business and human rights, in particular

- The prohibition of the use of forced or compulsory labor and the mistreatment of their employees. This includes the prohibition of all practices of modern slavery and human trafficking.
- The elimination of child labor.
- No discrimination: no distinction, exclusion or preference should be made on the basis of color, sex, age, language, religion, sexual orientation or identity, national or social origin, opinion, or disability.
- Respect for health and safety by ensuring healthy, safe and dignified working conditions and environment for its own staff.

- The allocation of a decent wage and working time by paying a minimum wage that meets basic needs and respects the regulations of the countries in which they work, in terms of working hours and rest periods.

- Respect for freedom of expression, freedom of association and the right to collective bargaining.

In addition, Dexia's members of staff in the purchasing department act within the framework of a specific code of conduct that sets out the rules of behavior with suppliers and subcontractors.

## 2. Environment

Dexia expects all its suppliers and business partners to commit to

- Respect the environmental laws and regulations in force in the countries where they operate.

- Control and/or minimize the impact of their activities on the environment, particularly in terms of consumption (water, energy and raw materials), greenhouse gas emissions, pollution (water, soil, air) and waste production (selective sorting, recycling).

- Develop environmentally friendly technologies by limiting the environmental impact of products or services throughout their life cycle.

## 3. Business ethics / Fair practices

Dexia expects its suppliers and business partners to commit themselves to respecting the laws and regulations relating to the principle of fairness in force in the countries where they carry out their activities. This covers in particular

- The fight against all forms of corruption, including extortion and bribery (zero tolerance policy in this area)

- Prohibition of all forms of anti-competitive practices (illicit agreements, abuse of dominant positions that may prevent, restrict or distort competition).

- Compliance with the applicable rules on confidentiality of non-public information and data protection.

## 4. Subcontracting

Dexia expects its suppliers and business partners to commit to

- Promote and enforce the principles of the Charter with their own suppliers and subcontractors.

- Put in place a monitoring process enabling them to prevent and manage any risk with an environmental and/or social impact throughout their supply chain

# Dexia's commitments to its suppliers and business partners

## 1. Ethics and transparency

Dexia undertakes to conduct its activities in a healthy and honest environment, in full compliance with all legal and regulatory provisions in force.

Dexia undertakes to :

- Respect a fair selection process for their suppliers by establishing the conditions for fair competition and fair treatment of their suppliers in selection procedures.
- Ensure transparency and compliance with the rules relating to selection procedures by clearly informing bidders in advance of the terms and conditions applicable to any competition.

## 2. Fair practices, fight against corruption, active or passive

Dexia intends to take all necessary measures to prevent corruption in all its activities and throughout the Group. In this context, Dexia has established provisions applicable to all its members of staff, but also to all those who work for the Group and those who act on its behalf. This is to prevent any form of active or passive corruption, including bribes and any form of extortion, and to apply a "zero tolerance" policy in this area. Nevertheless, insofar as Dexia manages its balance sheet in extinction, and therefore has no new clients, and currently only enters into business relations with financial counterparties for the financing of its balance sheet, the risk of corruption is considered to be relatively low.

However, as is the case for any activity, risks of non-compliance exist and to remedy this, the Dexia Group has put in place an integrity policy with the following objectives

- to promote honest, open and ethical behavior; and
- to ensure compliance with laws, regulations and other professional standards, as well as compliance with Dexia's codes of ethics, codes of conduct and other Group policies, in order to enhance and protect Dexia's reputation. The Compliance Charter describes the role and areas of competence of the Compliance function and presents the governance principles underlying Dexia's approach in this area.

## 3. Confidentiality and data protection

Discretion and respect for professional secrecy requirements (including banking secrecy when it applies) are essential, in particular in order to preserve Dexia's reputation. In this respect, procedures have been put in place within the Dexia Group in compliance with national regulations.

Moreover, in the context of compliance training, members of staff are regularly made aware of these obligations of discretion and respect for the separation of functions, with reminders of the good practices to adopt.

Data protection is essential and Dexia respects all national and European provisions relating to the protection of personal data.

Within the framework of the General Data Protection Regulation (GDPR), Dexia has identified and referenced all processes involving personal data, updated or drafted policies and procedures describing the management of data subjects' rights and the reporting of violations. The Group has also put in place, with the help of an external provider and internally, training courses to raise awareness of these regulations among all members of staff.

In addition, Dexia has updated its website to enable third parties to understand the processing of personal data undertaken by the company, their rights and contact details.

## 4. Conflicts of interest

Dexia has put in place standards to ensure a high level of investor protection, such as the conflicts of interest policy. The system in place aims to prevent conflicts of interest that could arise in the context of the activities that Dexia may carry out: credit restructuring, issuing, own-account activity, outsourcing of activities, and also its relations with suppliers, subcontractors and possible partners.

Dexia undertakes to respect the proper functioning of the markets in which it operates, the internal rules and procedures of these markets. Dexia undertakes not to intervene in operations which may contravene laws and regulations.

Dexia undertakes to ensure that market operators demonstrate professionalism and integrity in relation to intermediaries and counterparties.

Internal rules have been adopted to govern the external functions that may be exercised by managers in application of local rules or general principles on the prevention of conflicts of interest.

Dexia has a policy to ensure the independence of its auditors. Thus, it is necessary, among other things, to verify, prior to the granting of an assignment that is not directly related to the statutory audit work, whether this assignment is not nevertheless likely to affect the independence of the auditors.

## 5. Mutual dependence

In the context of mutual dependence with suppliers and business partners, it is required to

- Be alert to the risk of mutual dependency with their suppliers.
- Implement control measures to detect, monitor and minimize this risk.

## Monitoring the application of the charter

Dexia expects its suppliers and business partners to undertake to provide supporting documents for the application of the principles set out above in order to ensure the proper application of the Charter.