

## Amundi

### DECLARATION ON MODERN SLAVERY AND HUMAN TRAFFICKING

This declaration is published in compliance with Section 54 of the UK Modern Slavery Act 2015, which was enacted to combat slavery and human trafficking.

It describes the measures that Amundi (UK) Limited (“**Amundi UK**”) and Amundi Asset Management have implemented to prevent the risks of modern slavery and human trafficking in its business activities and relationships with its suppliers.

This declaration was approved by Amundi (UK)'s Board of Directors at its meeting on 21 July 2022.

### OUR GROUP, OUR BUSINESS ACTIVITIES AND OUR SUPPLY CHAIN

Amundi is a subsidiary of Crédit Agricole Group which hold 69.5%<sup>1</sup> of the share capital. Amundi is the European largest asset manager by assets under management<sup>2</sup> and ranks in the top 10 globally<sup>3</sup>. It manages 2,021 billion<sup>1</sup> euros of assets across six main investment hubs<sup>4</sup>. Amundi offers its clients in Europe, Asia-Pacific, the Middle East and the Americas a wealth of market expertise and a full range of capabilities across the active, passive and real assets investment universes. Clients also have access to a complete set of services and tools. Headquartered in Paris, Amundi was listed in November 2015. Thanks to its unique research capabilities and the skills of 5,300 team members and market experts based in 35 countries, Amundi provides retail, institutional and corporate clients with innovative investment strategies and solutions tailored to their needs, targeted outcomes and risk profiles.

### OUR COMMITMENTS

Acting as a responsible financial institution is a core commitment of Amundi's development strategy. This commitment is reflected in Responsible investment, one of Amundi's cornerstones. Amundi has always believed that companies and financial actors have the responsibility to face today's major challenges, and specifically in energy transition and social inclusion. Amundi believes that taking public interest into account strengthens financial performance. That is why Amundi integrates financial and non-financial analysis into its investment decisions. Amundi's responsibility is also to apply the principles of sustainable development to its own operations.

Amundi's CSR commitments are based in Crédit Agricole's new Group Project and its guiding purpose: “Acting in the interests of our clients and society every day”. Since its values have been at the heart of its commitment from its creation, Amundi fully identifies with the three flagship projects that form the bedrock of the Crédit Agricole Group's development: – the customer project, which seeks interpersonal excellence, – the human project, which is based on responsibility, – the societal project, which focuses on supporting sustainable development.

This reflects our desire to root our strategy and our commitments in the fundamental principles we adhere to, directly on behalf of Amundi or via Crédit Agricole S.A., our parent company, which are:

- The United Nations' Universal Declaration of Human Rights, of 1948
- The 10 principles of the UN Global Compact, since 2003
- The Principles for Responsible Investment (PRI), since 2006
- The UN Guiding Principles on Business and Human Rights approved by the Human Rights Council, in 2011
- The United Nations Sustainable Development Goals, since 2015

<sup>1</sup> As of 31/03/2022.

<sup>2</sup> Amundi data, as of 31/03/2022.

<sup>3</sup> Source: IPE “Top 500 Asset Managers” published in June 2021, based on assets under management as at 31/12/2020.

<sup>4</sup> Investment hubs: Boston, Dublin, London, Milan, Paris and Tokyo.

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- The OECD Guidelines for Multinational Enterprises
- The International Labour Organisation conventions
- The objectives of the Business for Inclusive Growth (B4IG) coalition coordinated by the OECD, since 2019
- The United Nations Environment Programme Finance Initiative (UNEP-FI), since 2014
- The Operating Principles for Impact Management, since 2020

## OUR POLICIES

These commitments are set forth in the following policies, which formally specify the principles of professional, social and environmental ethics to be observed throughout the Amundi Group, including in respect of human rights:

- The **Crédit Agricole Group Ethics Charter**, issued in May 2017, which clearly states that the Group's operational and behavioural principles comply with international laws and regulations on the protection of human rights and on the prevention of forced labour, child labour and corruption.

- The **Amundi Code of Conduct**, which implement the principles of the Crédit Agricole Group's Ethics Charter. The Amundi Code of Conduct which apply to the entire Amundi Group was disseminated in September 2019, after being approved by the Board of Directors on 30 July 2019 and being presented to employee representative bodies in 25 July 2019. It was updated end of 2021, and published by the HR department at the beginning of 2022.

- The **Diversity Charter**, which since 2008 has underpinned the Amundi Group's efforts to promote diversity in the workplace and prevent all forms of discrimination.

- The **International Framework Agreement** on fundamental human rights and trade union rights signed between Crédit Agricole S.A. and UNI Global Union, the global union federation for the private services sector, in July 2019, which apply in the entire Crédit Agricole S.A. Group.

- The **Responsible Purchasing Policy** and the **Responsible Purchasing Charter** extended to the entire Crédit Agricole Group in 2018, which require reciprocal commitments from all entities from the Crédit Agricole Group and its suppliers that are based on the fundamental principles of the UN Global Compact.

- The **Responsible Investment Policy** which set forth the social and environmental criteria that apply to investment activities and which include respect for human rights, and **our Exclusion policy** which consists of excluding companies whose practices do not comply with ESG convictions or with international agreements and frameworks and their transposition into national laws.

These documents are available on our website [www.amundi.com](http://www.amundi.com) and on Crédit Agricole website [www.credit-agricole.com](http://www.credit-agricole.com).

## MANAGEMENT OF MODERN SLAVERY AND HUMAN TRAFFICKING RISK

Our policies are accompanied by action plans and operating processes implemented within each location, which contribute to the management of risks relating to modern slavery and human trafficking in our activities and our relations with suppliers. These risks are assessed on the basis of a differentiated approach depending on the parties and activities concerned.

For Amundi prevention of these risks is based on relations with Amundi's employees and relations with suppliers and subcontractors of Amundi.

For each of these scopes, the framework for managing these risks consists of policies and action plans that include identification, assessment and risk attenuation phases. The level of deployment of these action plans is assessed in order to ensure their effectiveness and contribute to the ongoing improvement of prevention of these risks.

## GROUP POLICIES

Amundi's policies fall within the framework of the Crédit Agricole Group's Human Project<sup>5</sup> and that of the International Framework Agreement signed in July 2019 by Crédit Agricole S.A. and UNI Global Union. This international agreement covers human rights, fundamental labour rights and the development of employer–employee social dialogue. It aims to allow all the Crédit Agricole S.A. Group's employees to take advantage of a single base of social benefits, regardless of the country where they work, through a number of commitments to support people with disabilities as well as parenthood and personal prevention scheme. It builds on the Crédit Agricole S.A.'s commitments by proposing the same social standards for all its employees, regardless of where they work, and helping to improve working conditions. This agreement offers a frame of reference for Crédit Agricole S.A.'s 75,000 employees in the 47 countries in which it operates, including the 4,800 Amundi's employees.

Amundi's social policy is to engage in constructive dialogue with the various employee representative bodies, whether through formal bodies or through ad hoc groups facilitating more in-depth discussion. Amundi recognises that social dialogue and healthy employee representative bodies contribute to its development. Amundi is represented.

To guarantee respect of the human rights of all its employees, Amundi makes sure that all of its internal HR procedures are consistent with the commitments described in this declaration. Amundi ensures in particular that it offers a working environment that protects the health of its employees, plays an active role in the social protection of all its employees (particularly in terms of matters relating to health, retirement, death, incapacity and disability) and takes care to protect the safety of its employees. As a signatory of the Diversity Charter, Amundi has been committed for a number of years to an approach aiming to promote diversity and balance based on principles of non-discrimination.

Amundi's Code of Conduct specifies the behaviour that is expected of all employees. It reminds employees that they must strictly observe the rules that govern professional ethics and respect for human rights and fundamental labour rights, both in their relationships with other employees and with all other parties. The implementation of these rules is based on a corpus of procedures in the area of compliance (Corpus Fides), which is regularly disseminated and updated. This includes processes for managing non-compliance risk and a specific procedure for reporting non-compliance.

## SUPPLIERS AND CONTRACTORS OF AMUNDI

In order to identify and fight the risks of modern slavery practices and human trafficking linked to its supply chain, the Purchases of Amundi France adhere to the mechanisms set up by the Corporate Purchasing Department of Crédit Agricole Group to :

- Identify and assess the most at-risk sectors in its supply chain;
- Monitor risk areas;
- Fight against the risks of modern slavery practices in its processes.

In 2018, Amundi signed the Crédit Agricole Group's Responsible Purchasing policy, which includes preventing the risks of practices linked to modern slavery and human trafficking and committed to enforcing it on its perimeter. It is intended for employees involved in the procurement process and suppliers. Moreover, the rules applicable to procurement are described in a procedural note that applies to all employees of its French and international entities.

A "Buy Responsible" Learning module followed in 2020 by all the employees of the Purchasing business line to raise their awareness of the company's issues, policies and procedures and a CSR Purchasing guide is available on the majority of the purchasing categories they control. In 2021, the "Buy Responsible" module was extended to employees who spend less than 50% of their time on the Purchasing function.

<sup>5</sup> See Crédit Agricole SA Registration Document 2019.

The CSR risk analysis for procurement is based on three complementary approaches: the assessment of the risk of the procurement category, the analysis of the supplier risk and the analysis of the risk of the geographical area. In 2017 a new mapping of the intrinsic CSR risks related to the purchasing categories of the banking sector was jointly built between the Corporate Purchasing Department of Crédit Agricole and three major players in the banking sector accompanied by AFNOR.

As a result of this mapping, three categories of purchases identified as high or very high risk were identified as priorities for initiating an action plan to reduce risk. These are the categories of purchases:

- Works,
- IT hardware and servers and
- Advertising objects,

for which progress plans were initiated in 2019.

For procurement categories that are subject to referencing, the CSR assessment of suppliers that includes human rights criteria is systematically integrated into each call for tender. It covers both the CSR policy of the supplier and the CSR criteria for evaluating the offer.

The evaluation of the CSR policy of the supplier is delegated to an independent and specialized third party, Ecovadis. The CSR quality of the supplier's offer (product or service) will be assessed by including in the specification specific technical criteria determined on the basis of risk mapping. The percentage attributed to CSR criteria in the supplier's overall rating increased from 10% to 15% in 2020 and end 2021 this criteria increased to 35% of the final note

For suppliers whose offers are not referenced, a third CSR rating campaign has been launched in 2021 with suppliers whose expenses is exceeding 100,000 euros in order to identify any potential risks and to support suppliers in setting up an improvement plan.

Finally, the commitment of our suppliers to our values is supported by our contracts which incorporate a specific clause "Respect for human rights", "protection of the environment" and "fight against corruption" whereby suppliers declare and guarantee that they respect and enforce in their supply chains all their obligations in terms of risk identification and the prevention of serious infringements against human rights and fundamental freedoms, the health and safety of persons and the environment resulting from their activities, under laws and/or regulations relating to respect for human, social and environmental rights.

## **WHISTLEBLOWING**

In order to enhance risk prevention, a whistleblowing centralized system for reporting alerts is open to Group employees to enable them to report any shortcomings with regard to Group ethics, policies or procedures. To make it easier to report alerts relating, among other areas, to human rights, health and safety or the environment, this can now be done via a digital warning reporting and processing tool that can be accessed via the intranet for the employees. The confidentiality of the identity of persons reporting alerts (with the possibility of speaking on condition of anonymity) is ensured if an alert is made in accordance with regulations.

This alert processing tool was rolled out widely across Amundi Group. It is now available in 11 languages (French, English, German, Spanish, Italian, Dutch, Portuguese, Polish, Romanian and Serbian).

## **CONTINUOUS IMPROVEMENT**

Measures for preventing risks of breaches of human rights include both obligations arising from international rules and recommendations and those of national law.

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Therefore, all efforts to prevent these risks are developed in accordance with the measures of the 'Sapin 2 Act' of 9 December 2016 on the Transparency, the Prevention of Corruption and the Modernization of the Economy, and the Vigilance Plan of Crédit Agricole SA group established within the framework of the French law of 27 March 2017 relating to the duty of care of parent companies and contracting companies.

Amundi's entire approach is part of a continuous improvement process, the main components of which are :

- Adapting non-financial risk identification and management tools by updating risk maps when necessary;
- Continuing with the deployment of targeted action plans to reduce the CSR risk of suppliers in the purchasing categories identified as 'high risk' and 'very high risk'; Seeking to involve our suppliers in our efforts, by regularly informing them of our responsible purchasing commitments and strategy;
- Making our whistleblowing procedure accessible to our Third party suppliers.

## **POWERS**

Full powers were given by the Board of Directors of Amundi UK to its Chief Executive Officer or Deputy Chief Executive Officer in order to sign this declaration.

London, 26 July 2022



Amundi (UK) Limited  
Philippe d'Orgeval  
Chief Executive Officer