Reporting and Self-Assessment Template

The following table sets out the reporting and self-assessment requirements for Signatories of the Principles for Responsible Banking. Signatory banks need to report on their implementation of the Principles the first time within latest 18 months after signing and annually thereafter (in line with their annual reporting cycle).

How to use this template?

This template does NOT require your bank to produce an additional report. Rather, this template is designed for your bank to provide references/links to where in your existing reporting/public domains the required information can be found. The aim is to keep additional reporting burden to a minimum while ensuring transparency and accountability as set out in Principle 6.

Within this reporting template, there are six areas for self-assessment that are key to showing that your bank is fulfilling its commitments as a signatory of the Principles for Responsible Banking. They are highlighted.

1. Impact Analysis
2. Target Setting
3. Plans for Target Implementation and Monitoring
4. Progress on Implementing Targets
5. Governance Structure for Implementation of the Principles
6. Progress on Implementing the Principles for Responsible Banking

Only for these six highlighted items, it is required that:

a) An assurer provides limited assurance of your self-assessment. You can do this by including it in your existing assured reporting. Where third-party assurance is not feasible, an independent review may be conducted.

b) You provide your bank’s conclusion/statement if it has fulfilled the respective requirements.

Accommodating different starting points:

Banks have different starting points and operate in different contexts. Your bank may not be able to provide all information required in this template the first time you report. That is fine. Your bank has up to four years from signing to bring its reporting fully in line with the requirements. Feedback, support and peer learning are available to all signatory banks to help them progress with both implementation and reporting.
**Principle 1: Alignment**

We will align our business strategy to be consistent with and contribute to individuals’ needs and society’s goals, as expressed in the Sustainable Development Goals, the Paris Climate Agreement and relevant national and regional frameworks.

1. **Describe (high-level) your bank's business model**, including the main customer segments served, types of products and services provided, the main sectors and types of activities, and where relevant the technologies financed across the main geographies in which your bank has operations or provides products and services.

**Groupe BPCE** conducts all banking and insurance businesses through its two main cooperative networks – Banque Populaire and Caisse d’Epargne – and their subsidiaries (Natixis...).

It is the second largest banking group in France and has a strong local presence. Its 100,000 employees serve 36 million customers, including 9 million cooperative shareholders, performing their duties with a constant eye on the needs of individuals and local areas. It contributes to financing more than 20% of the French economy.

**Business model**

The strength of model of **Groupe BPCE** derives from:

- **Known brands** (Banque Populaire, Caisse d’Epargne, Crédit Coopératif, CASDEN, Banque Palatine, Oney, and Natixis).
- **Groupe BPCE** is the second-largest banking group in France. It is also operating in **40 countries**;
- four business lines: Retail Banking and Insurance, Retail Banking, Asset & Wealth Management, Payments;
- Our structure as a full-service bank with a diversified business portfolio dominated by retail banking in France.
- We accompany **our clientele of individual, professional, and corporate customers, associations, institutions, etc.** and we operate in all fields of banking and insurance, and offer our expertise in savings, private banking, real estate loans, consumer credit, property insurance, provident & health insurance...

**Natixis**, a subsidiary of **Groupe BPCE**, is a French multinational financial services firm specialized in **asset & wealth management, corporate & investment banking, insurance and payments**.
Natixis counts nearly 16,000 employees across 38 countries. Its clients include corporations, financial institutions, sovereign and supranational organizations, and the customers of Groupe BPCE’s networks.

**PRB**

Principles for Responsible Banking apply exclusively to **Groupe BPCE’s** banking activities.

Principles for Responsible Banking apply exclusively to **Natixis’** corporate and investment banking activities, while the Principles for Responsible Investment apply to Natixis’ asset management and insurance activities.

1. **Presentation of Natixis**

2. **Describe** how your bank has aligned and/or is planning to align its strategy to be consistent with and contribute to society's goals, as expressed in the Sustainable Development Goals (SDGs), the Paris Climate Agreement, and relevant national and regional frameworks.

**Groupe BPCE with Natixis, a subsidiary of Groupe BPCE, is committed to achieve SDGs through the endorsement of several voluntary international initiatives including, in addition to the PRBs, the United Nations Global Compact. Natixis endorses also the Equator Principles, and act4nature international.**

**SDGs**

**For the Group,** its actions have a positive impact on priority goals through its internal management, patronage activities, and especially its financing activities (*financing in the social, non-profit, renewable energy, agriculture, education, healthcare and microfinance sectors, etc.*).

Its sustainable development policy focuses, though not exclusively, on the following SDGs:

- transparency and the cooperative business model (SDG 16);
- banking inclusion (SDGs 1 and 10);
- financing the energy, ecological and social transition (SDGs 7, 8 and 12);
- a strong local presence (SDG 11);
- objectives for gender equality in the workplace and the inclusion of persons with disabilities (SDGs 5 and 10);
- boosting its employees’ employability (SDG 4).

This analysis identified two types of strategic goals for the Group:

- the SDGs for which BPCE makes a positive contribution, i.e. action taken by the Group to facilitate the achievement of the goals by 2030;
- the SDGs for which BPCE has taken action to minimize its identified risks;

Please refer to Groupe BPCE 2020 Universal Registration Document (URD), sections:

- DPEF Introduction
- 2.2.2 our commitments
- 2.3.1 Integrate the fight against climate change and the preservation of biodiversity into our development strategy

Please refer to Natixis’ 2020 Universal Registration Document (URD), sections:

- 6.1.4 Contribution to Sustainable Development Goals (SDGs)
• the analysis is organized into the three types of actions that embody the Group:
  - a Banking group (through its banking and insurance businesses),
  - a Responsible group (through its internal operations),
  - a Cooperative group (through its strong local presence and its cooperative values).

Natixis has identified 13 SDGs on which it can substantially contribute through its financing and investment business as well as its own operations.

**The Paris Climate Agreement**

Groupe BPCE is aligned with the goals of the Paris agreement, which are part of the European Union’s commitments to achieve carbon neutrality by 2050 and its ambition for greenhouse gas reduction by 2030, through the Green Pact.

In 2020, Groupe BPCE took part in the movement to communicate its strategy and actions in favor of the fight against climate change by responding to the CDP questionnaire.
https://www.cdp.net/fr/responses?utf8=%E2%9C%93&queries%5Bname%5D=bpce

In 2021, Groupe BPCE will publish its first TCFD report.

The Group’s overall risk policy incorporates the consideration of ESG risks, particularly those related to climate change. This umbrella policy is applied in the banks and at the central level in sector policies. The consideration of climate risks is updated at each review of the Group’s sector policies. Groupe BPCE’s umbrella risk policy includes also a section dedicated to the impacts on biodiversity.

An ESG questionnaire was developed by Groupe BPCE with the aim of collecting ESG information from SMEs and SMIs, in order to measure their level of exposure and maturity on these issues. Serving as a support for a strategic dialog, it aims to determine the needs of support in the transition and to propose adequate banking and insurance products.

This year, for Banques Populaires and Caisses d’Epargne balance sheets, Groupe BPCE launched a new initiative to measure the alignment of its portfolio with the objectives set
by COP21, aimed at limiting the increase in temperature well below two degrees by the end of the century. This work was carried out in collaboration with the think tank 2 Degrees Investing Initiative (https://2degrees-investing.org/) which developed the PACTA calculation engine (Paris Agreement Capital Transition) already used today by 1500 financial institutions. The methodology is applicable to the following six sectors: electricity production, automotive construction, mining, steel production and cement production.

Also, a member of Groupe BPCE participates in Climate and Sustainable Finance Committee of the ACPR and the AMF. The FBF has set up a Climate Committee chaired by Laurent Mignon which brings together representatives from the Risk and CSR departments of all French banking groups. In 2020, the group participated in the ACPR’s mandatory Climate stress testing, the first climate pilot exercise.

**Natixis, a subsidiary of Groupe BPCE,** participates in achieving the objective of the Paris Agreement first through the exclusion of sectors that have the highest negative impact on climate and the environment: thermal coal mining, coal power generation, tar sands, extra heavy oil, oil in the Arctic, shale oil and shale gas exploration and production.

**Natixis** is also committed to climate action through the Collective Commitment to Climate Action (CCCA), an initiative of the private banking sector facilitated by UNEP FI setting out the concrete and time-bound actions 38 banks are taking to scale up their contribution to and align their lending books with the objectives of the Paris Agreement on climate.

**Natixis** is currently in the process of finalizing a comprehensive methodology to define the temperature trajectory of each loan in its portfolio through its Green Weighting Factor (GWF) initiative. It is committed to set in 2021 (i) climate impact targets for all its banking activities, and (ii) the future date at which it expects its portfolio to be aligned with the objective of the Paris Agreement.

**Other national commitments**

**Example for the Groupe BPCE:**
- Responsible Digital Charter Groupe BPCE (signing date 2020)
| - Corporate Diversity Charter - Groupe BPCE (signing date 2010) |
| - Responsible Supplier Relations Charter Groupe BPCE (signing date 2010) |
| - Charter Cancer@work < 23 Groupe BPCE entities |
| - Work-Life Balance Charter< 14 Banques Populaires, 15 Caisses d’Epargne and Natixis |
| - Supplier Relations and Responsible Procurement label backed by the ISO 20400 Responsible Procurement standard< 14 Group entities |
| - Responsible Purchasing Charter, BPCE Achats for Groupe BP. |

**Principle 2: Impact and Target Setting**

We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products and services. To this end, we will set and publish targets where we can have the most significant impacts.
2.1 Impact Analysis:

Show that your bank has identified the areas in which it has its most significant (potential) positive and negative impact through an impact analysis that fulfills the following elements:

a) **Scope:** The bank’s core business areas, products/services across the main geographies that the bank operates in have been as described under 1.1. have been considered in the scope of the analysis.

b) **Scale of Exposure:** In identifying its areas of most significant impact the bank has considered where its core business/its major activities lie in terms of industries, technologies and geographies.

c) **Context & Relevance:** Your bank has taken into account the most relevant challenges and priorities related to sustainable development in the countries/regions in which it operates.

d) **Scale and intensity/salience of impact:** In Businesses of the Groupe BPCE has been committed for several years in favor of more inclusive finance, a more sustainable and environmentally friendly society. In 2017, in its strategic plan (2018/2020), Groupe BPCE adopted its first indicators related to responsible savings and the financing of the energy transition. The group strengthens its commitments in all areas and makes CSR a strategic priority for its new global strategy. Consequently, Groupe BPCE continues to take account of climate change and biodiversity as well as social, societal and regional issues and governance issues in all components of its business and all of the entities.

Climate, biodiversity and human rights (due to our international presence) have been identified as significant impact areas of Groupe BPCE’ banking activities. Measuring and monitoring the bank’s impacts in these three areas: (1) has not yet reached the same level of maturity and (2) these tree subjects are not necessarily addressed by all entities of the Group.

**Groupe BPCE**

Groupe BPCE identifies and manages risks with a non financial risk matrix.

- **Climate change:**
  
  Groupe BPCE wants to join a compatible trajectory with a 2°scenario. To do this, he conducts research about carbon footprint and about alignment work portfolios with the Paris Agreements (*Financing outstandings: use of the PACTA calculation method for Caisse d’Epargne and Banque Populaire, …*) and he helps its customers in the transition towards a more sustainable economy.

  In 2020, Groupe BPCE took part in the movement to communicate its strategy and actions in favor of the fight against climate change by responding to the CDP questionnaire. In 2021, Groupe BPCE will publish its first TCFD report. Groupe BPCE’s umbrella risk policy is applied in the banks and at the central level in the sector policies with ESG factors. These include a section dedicated to the impacts also on biodiversity.

- **Social change:**
  
  The Banques Populaires and the Caisse d’Epargne are major sources of funding for local authorities, social housing operators and structures in the social and solidarity-based economy. There are also: philanthropic strategy based on local needs. In 2020, Groupe BPCE continued its actions in terms of inclusive finance for “vulnerable” customers (OCF), prevention

2.1.1 Drawing on our business model to create sustainable, robust value

2.2.4 Identifying and managing risks to ensure our development

Please refer to Natixis’ 2020 Universal Registration Document (URD), sections:

6.4.2.1 GWF: an innovative solution for a greener loan book

6.5.1 Incorporating ESG criteria in financing operations and investments

6.4.1.2 Commitment to the Principles for Responsible Banking (PRB)
identifying its areas of most significant impact, the bank has considered the scale and intensity/salience of the (potential) social, economic and environmental impacts resulting from the bank’s activities and provision of products and services. (your bank should have engaged with relevant stakeholders to help inform your analysis under elements c) and d))

Show that building on this analysis, the bank has
• Identified strategic business opportunities in relation to the increase of positive impacts / reduction of negative impacts

of the risk of over indebtedness, personal or professional microloan, and accessibility for customers with disabilities, (…).

**Natixis, a subsidiary of Groupe BPCE**

Climate, biodiversity and human rights (due to our international presence) have been identified as significant impact areas of Natixis’ banking activities.

Measuring and monitoring the bank’s impacts in these three areas has not yet reached the same level of maturity.

- Measuring environmental impacts, **climate change and biodiversity in particular**, is well advanced thanks to Natixis’ proprietary tool, the Green Weighting Factor (GWF). The tool uses a bottom-up approach which enables a very granular analysis of each loan. Climate impacts are systematically evaluated, while other environmental impacts (including biodiversity, but also water, pollution, and waste) are taken into account when material. The GWF methodology was finalized in 2019 for all sectors financed by the bank (except for the financial sector) and is being gradually deployed globally to all business lines.

- Impacts of our banking activities on **human rights** are evaluated through both the Equator Principles since 2010 (applicable when financing projects or specific assets) and the ESG Risk Screening Tool implemented in 2020 (applicable to all banking activities).

- Natixis is an active player within the UNEP FI working groups to develop the impact tools on portfolio and corporates. Natixis is committed to measuring the impact of its activities on all SDGs when guidance on how to apply the impact tools will be finalized and published (expected in 2021).

Please provide your bank’s conclusion/statement if it has fulfilled the requirements regarding Impact Analysis.

**Groupe BPCE and Natixis** have fulfilled the requirements regarding Impact Analysis. Climate, biodiversity and human rights have been identified as significant impact areas.

**In particular for Natixis**, impact analysis has already been fully implemented on climate change through the Green Weighting Factor, to the most material sectors on biodiversity, and partially on human rights. Natixis is committed to measuring impacts of its activities on all SDGs as early as in 2021 if possible.
### 2.2 Target Setting

**Show** that the bank has set and published a minimum of two **Specific, Measurable** (can be qualitative or quantitative), **Achievable, Relevant** and **Time-bound** (SMART) targets, which address at least two of the identified “areas of most significant impact”, resulting from the bank’s activities and provision of products and services.

**Show** that these targets are linked to and drive alignment with and greater contribution to appropriate Sustainable Development Goals, the goals of the Paris Agreement, and other relevant international, national or regional frameworks. The bank should have identified a baseline (assessed against a particular year) and have set targets against this baseline.

**Show** that the bank has analysed and acknowledged significant (potential) negative impacts of the set targets on other dimensions of the SDG/climate

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Climate, biodiversity and human rights have been identified as significant impact areas for the bank. Measuring and monitoring the bank’s impacts in these areas: (1) has not yet reached the same level of maturity and (2) these tree subjects are not necessarily addressed by all entities of the Group.

The strategic plan of Groupe BPCE came to an end on December 31, 2020. All our quantitative indicators about economic, societal and environmental engagements and employee benefits (gender equality…) are disclosed. For example, on environmental engagement, two project are followed with monitoring indicators:

- Reducing our direct environmental impacts with the indicator: Carbon emissions (in metric tons of CO2 equivalent) – Scope 1, 2 and 3 emissions – excl. data centers
- Promoting the environment in our business lines with the indicator: Financing for the energy transition (in billions of euros).

For example, on social engagement:

- Origination of microloans with support for individual customers (in millions of euros)
- Origination of microloans and other solidarity-based loans for entrepreneurs (in millions of euros)

**For Natixis**, targets have been set to address the impacts of our activities on both climate change and biodiversity. Target setting on human rights impacts has not yet been completed.

- **On biodiversity**, Natixis disclosed in 2020 27 SMART targets to address the impacts of all its activities, related to SDGs 2, 6, 8, 9, 13, 14, 15 (through the framework of the act4nature international initiative).
- **On climate change**, Natixis has committed to aligning its banking activities on a well-below 2°C trajectory, and is currently working to define more granular targets for key sectors and each business line. New SMART targets will be set in 2021 using the Green Weighting Factor methodology, and Natixis will disclose the date at which it targets for its banking portfolio to reach alignment with the objective of the Paris Agreement.
- Impacts on all material issues covered by the SDGs (**including human rights**) are analysed for all our clients through the ESG Risk Screening tool, and negative impacts are mitigated for project financing through the...
| change/society’s goals and that it has set out relevant actions to mitigate those as far as feasible to maximize the net positive impact of the set targets. | Equator Principles, but no SMART target has yet been set on other areas but climate and biodiversity. |

Please provide your bank’s conclusion/statement if it has fulfilled the requirements regarding Target Setting.

**Groupe BPCE and Natixis** have partially fulfilled the requirements regarding Target Setting. Climate, biodiversity and human rights have been identified as significant impact areas. For Natixis, SMART targets have already been set on biodiversity and will be set in 2021 on climate. They still need to be defined for human rights. Other environmental and social impact areas are considered through the ESG Risk Screening tool and the Equator Principles.

### 2.3 Plans for Target implementation and Monitoring

**Show** that your bank has defined actions and milestones to meet the set targets.

**Show** that your bank has put in place the means to measure and monitor progress against the set targets.

Definitions of key performance indicators,

For all its activities, **Natixis** has made strategic commitments on climate and biodiversity:

- **Biodiversity**: each commitment has an indicator and a target defining the roadmap and enabling a monitoring of the implementation. Achievements of targets with a

Please refer to Natixis’ 2020 Universal Registration Document (URD), sections:

6.4.3.1 Natixis commitment for biodiversity

any changes in these definitions, and any rebasing of baselines should be transparent.

2020-deadline are disclosed in our 2020 Non-financial performance report (chapter 6 of URD 2020).

- **Climate:** The Green Weighting Factor is fully implemented in the bank’s IT systems, allowing for a granular and regular monitoring of the climate impact of Natixis’ banking activities. GWF data is monitored and reported internally to Natixis’ management at least on a quarterly basis. Sectorial exclusion policies are also key levers to implement Natixis’ climate strategy. Exclusions are monitored through the ESG Risk Screening tool.

Please provide your bank’s conclusion/statement if it has fulfilled the requirements regarding Plans for Target Implementation and Monitoring.

**Natixis** has fulfilled the requirements regarding Plans for Target Implementation and Monitoring. All targets already set by Natixis are being monitored on a regular basis (at least quarterly), including through implementation in the bank’s IT systems.

### 2.4 Progress on Implementing Targets

For each target separately:

**Show** that your bank has implemented the actions it had previously defined to meet the set target.

**Or explain** why actions could not be implemented / needed to be changed and how your bank is adapting its plan to meet its set target.

**Report** on your bank’s progress over the last 12 months (up to 18 months in your first reporting after becoming a signatory) towards achieving each of the set targets and the impact your progress resulted in.

**Groupe BPCE** wants to join a compatible trajectory with a 2°scenario. To do this, he conducts research about carbon footprint and about alignment work portfolios with the Paris Agreements (*Financing outstanding: use of the PACTA calculation method for Caisse d’Epargne and Banque Populaire, …*) and he helps its customers in the transition towards a more sustainable economy. These ambitions will be presented in the Group’s future strategy shortly. Actions, targets, indicators, and measure will be disclosed.

**Natixis, a subsidiary of Groupe BPCE**

- **Biodiversity:** Achievements of targets with a 2020-deadline are disclosed in our 2020 Non-financial performance report (chapter 6 of URD 2020).
- **Climate:** The GWF rating methodology was finalized in 2019 for all sectors financed by the bank (except for the financial sector which is excluded from the GWF scope). After developing the methodology and a proof of concept phase, the GWF tool was implemented in the bank’s IT systems and incorporated in the bank’s processes along the lending value chain (new credit and annual review processes). The GWF is being gradually deployed globally to all banking business lines, including capital market activities for which it will also apply by end of 2021.

Please refer to Natixis’ 2020 Universal Registration Document (URD), sections:

- 6.4.3.1 Natixis commitment for biodiversity
- 6.4.2.1 GWF: an innovative solution for a greener loan book
(where feasible and appropriate, banks should include quantitative disclosures)

<table>
<thead>
<tr>
<th>Please provide your bank’s conclusion/statement if it has fulfilled the requirements regarding Progress on Implementing Targets</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Natixis</strong> has fulfilled the requirements regarding Progress on Implementing Targets: reporting on targets with a 2020-deadline is included in our 2020 URD.</td>
</tr>
</tbody>
</table>

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**Principle 3: Clients and Customers**

We will work responsibly with our clients and our customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.

3.1 Provide an overview of the policies and practices your bank has in place and/or is planning to put in place to promote responsible relationships with its customers. This should include high-level information on any programmes and actions implemented (and/or planned), their scale and, where possible, the results thereof.

<table>
<thead>
<tr>
<th>By channeling our customers’ savings towards a more responsible economy and financing the energy transition, Groupe BPCE as a responsible bancassurance specialist. Our commitment finds expression in the financing of major green infrastructure projects as well as in the thermal renovation of single-family housing and the acquisition of clean vehicles. It also means speeding up the development of savings inflows and the management of more responsible investment products, as well as promoting dedicated refinancing tools such as the issuance of green or social bonds.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>For Groupe BPCE</strong>, all the risks were reviewed in the non-financial risk matrix. This subject “customer” is very important for the Group because the severity of the “Customer protection &amp; transparency of the range of products and services” risk increased from moderate to high.</td>
</tr>
<tr>
<td>Groupe BPCE adopted a Group code of conduct and ethics in 2018. It sets out the Group’s ethical standards in three areas: the interests of customers, employer responsibility and social responsibility, with practical business-oriented examples.</td>
</tr>
<tr>
<td>Groupe BPCE protects its customers’ interests by tasking committees with the approval of new products, services and sales processes and any upgrades. Complaints are followed and monitored and customer satisfaction is measured using the NPS (net promoter score).</td>
</tr>
</tbody>
</table>

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Please refer to Groupe BPCE 2020 Universal Registration Document (URD), sections:

2.2.4 Identifying and managing risks to ensure our development

2.4 Being a responsible group in its internal and external practices

2.3.2 Supporting our customers in the energy, ecological and social transition

2.3.3 Supporting local regions in the transition

2.3.5 Steering customers’ deposits and savings towards a more responsible economy
score). In 2019, Groupe BPCE committed to providing a customer experience aligned with the highest standards on the market.

The Group’s overall risk policy incorporates the consideration of ESG risks, particularly those related to climate change. This umbrella policy is applied in the banks and at the central level in sector policies. The consideration of climate risks is updated at each review of the Group’s sector policies. Groupe BPCE’s umbrella risk policy includes also a section dedicated to the impacts on biodiversity.

The main challenge for a bank of Groupe BPCE’s size is to be able to incorporate environmental issues into its customer relations. In their projects, Groupe BPCE supports its customers by financing energy renovation projects, insuring ecological projects, supporting access to soft mobility or in their investments for example with passbook saving accounts… Indeed, Caisses d’Epargne and Banque Populaire the two retail banks networks of Groupe BPCE developed several products to help their customers in this transition.

Groupe BPCE is a leading operator in solidarity savings in France: it is the leading collector and manager, according to the latest Finansol professional survey.

In 2020, Groupe BPCE continued its actions in terms of inclusive “vulnerable” customers (OCF), prevention of the risk of finance through several systems ensuring access to banking over-indebtedness, personal or professional microloan, products and services adapted to the diversity of its customers’ accessibility for customers with disabilities, and banking situations: the right to hold an account, a specific offer for services for protected persons.

Natixis, a subsidiary of Groupe BPCE, acts as a responsible bank through financing activities that contribute to the transition to a low carbon economy (e.g. renewable energy, sustainable infrastructure), and/or that have a positive impact on society (e.g. social bonds), and by supporting the transition of our clients.

In order to promote responsible relationships with its clients, Natixis has implemented several sectorial policies that apply to all products and services developed for clients, in the following sectors:

- Coal
- Defence

Please refer to Natixis’ 2020 Universal Registration Document (URD), sections:

6.4.2 Green growth: financing the energy transition and combating climate change
6.5.1 Incorporating ESG criteria in financing operations and investments
6.4.2.1 GWF: an innovative solution for a greener loan book
Natixis has also been a **signatory of the Equator Principles** since 2010, which implies in-depth analysis of environmental and social issues of projects, and continuous client engagement (including on mitigation measures and impact commitments).

Natixis has put in place a policy to systematically engage with its clients on all transactions covered by the Equator Principles, or falling under the framework of a sectorial policy.

- To identify, assess and monitor the environmental, social and governance (ESG) risks of its corporate clients, Natixis has developed and implemented in 2020 a complementary tool, the **ESG Risk Screening tool**.

- In 2020, Natixis also launched a **“transition task force”** to identify the transition potential of its clients active in the most carbon intensive sectors, using the **GWF** rating as a starting point of this analysis. The task force resulted in strongly increased engagement with those clients around their climate impacts and necessary pathway to achieve transition.

### 3.2 Describe how your bank has worked with and/or is planning to work with its clients and customers to encourage sustainable practices and enable sustainable economic activities.

This should include information on actions planned/implemented, products and services developed, and, where possible, the impacts achieved.

The main challenge for a bank of **Groupe BPCE**’s size is to be able to incorporate environmental issues into its customer relations. In their projects, Groupe BPCE supports its customers by financing energy renovation projects, insuring ecological projects, supporting access to soft mobility or in their investments for example with passbook saving accounts... Indeed, Caisses d’Epargne and Banque Populaire, the two retail banks networks of Groupe BPCE developed several products to help their customers in this transition.

Groupe BPCE is a leading operator in solidarity savings in France: it is the leading collector and manager, according to the latest Finansol professional survey.

In 2020, Groupe BPCE continued its actions in terms of inclusive “vulnerable”customers (OCF), prevention of the risk of finance through several systems ensuring access to banking over-indebtedness, personal or professional microloan, products and services adapted to the diversity of its customers’ accessibility for customers with disabilities,

Please refer to Groupe BPCE 2020 Universal Registration Document (URD), sections:

- 2.3.2 Supporting our customers in the energy, ecological and social transition
- 2.3.3 Supporting local regions in the transition
- 2.3.5 Steering customers’ deposits and savings towards a more responsible economy

Please refer to Natixis’ 2020 Universal
and banking situations: the right to hold an account, a specific offer for services for protected persons.

**Natixis** has been very active and innovative in the development of several types of financing with a social and environmental impact, focusing on achieving SDGs. Natixis is actively promoting sustainable finance, focusing on green bond issuance, renewable energy financing, sustainable infrastructure financing. Natixis has also closed several sustainability-linked loans resulting from client engagement on sustainability issues: the margin of such loans is directly linked to each client’s achievement of pre-agreed sustainability targets. Products and services focused on achieving positive social impacts were developed since early 2020, with inaugural COVID bond emissions.

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**Principle 4: Stakeholders**

We will proactively and responsibly consult, engage and partner with relevant stakeholders to achieve society’s goals.

**Groupe BPCE** interacts with its stakeholders in the course of its business:

- Customers (Businesses, Institutions, Individuals)
- Cooperative shareholders (Banque Populaire customers Caisse d’Epargne customers)
- Directors (Local savings companies, Boards of Directors of the Banques Populaires, Supervisory Boards of the Caisse d’Epargne, BPCE SA Supervisory Board, Specialized committees)
- Employees (Employees of the Group and its subsidiaries Employee representatives and labor unions)
- NGOs and non profits (Non-profits protecting the environment and human rights)
- Associations
- Academic and research sector (Business schools and universities Research institutions)
- Ratings agencies, investors and independent third parties (Financial and ESG rating agencies statutory auditors)
- Suppliers and sub-contractors
- Banking regulator (Financial regulatory authorities)
- Etc.

Groupe BPCE is working with independent third party bodies to verify information (Deloitte performs audit work on the information published in the Non-financial performance report (reasonable assurance)).

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**Registration Document (URD), sections:**

- section 6.4 Business line contributions to green and sustainable growth
- 2.2.2 Our commitments
- 2.6 Report of one of the Statutory Auditors, appointed as an independent third party, on the consolidated statement of non-financial performance included in the Group management report
- 6.1.5 Dialogue with stakeholders
**Natixis** interacts with many stakeholders through its various businesses and functions: clients, shareholders, employees, NGOs, associations, universities and schools, suppliers, regulators and supervisors. Although those regular interactions may not be specifically related to the Principles, stakeholders’ feedbacks regularly contribute to improve the bank’s policies and impacts.

For example, NGOs are usually consulted on updates of Natixis’ sectorial policies. Natixis’ SMART targets on biodiversity set in 2020 were validated by a multi-stakeholder committee made up of 16 partners, including several environmental NGOs.

Natixis is also working with independent third parties to verify information it discloses:
- Deloitte performs audit work on the information published in the Non-financial performance report (reasonable assurance)
- KPMG will carry out a first independent verification of the GWF in 2021 (all financing scope except trade finance), with a final opinion in 2022.

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**Principle 5: Governance & Culture**  
We will implement our commitment to these Principles through effective governance and a culture of responsible banking

**Group Relevant CSR governance:**

The Group’s CSR commitments are managed by a dedicated function within BPCE. The Group CSR Director reports directly to the Chairman of the Group’s Management Board. In order to consolidate the Group’s commitment to CSR, CSR governance was simplified at the end of 2020 with the creation of a central Group CSR department and committees chaired by it. One of the missions of the new Group CSR Department is to help steer, define and implement the Group’s strategic ambitions in terms of environmental transition.

The CSR businesses (CSR BPA, CSR Natixis, CSR SEF) are essential relays on the Group CSR Department. This management is carried out in conjunction with the Fédération Nationale des Banques Populaires and the Fédération Nationale des Caisses d’Epargne, which coordinate CSR policy within their respective networks.

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**6.3 Business ethics and safety (Représentation of interests)**

Biodiversity Press Release:  

**6.10 Report by one of the Statutory Auditors, appointed independant third party, on the consolidated non-financial performance report**

GWF Press Release  

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**Please refer to Groupe BPCE 2020 Universal Registration Document (URD), sections:**

2.2.4 Identifying and managing risks to ensure our development

2.4 Being a responsible group in its internal and external practices

Please refer to Natixis’ 2020 Universal Registration Document (URD), sections:
The committees are various:

- **Group CSR Governance on climate issues, in project**, is based on the General CSR Management Committee and the Strategic Environmental Transition Committee. The operational implementation of the strategy on “environmental issues” is steered through the ESG steering committee and the Sustainable Finance task force.
- **Cooperative and CSR Committee of the Supervisory Board of Groupe BPCE** (Steers and rules on major strategic CSR guidelines. The committee met twice in 2020.)
- **Cooperative Shareholder & CSR Committee of the Fédération Nationale des Banques Populaires and CSR Committee of the Fédération Nationale des Caisses d’Epargne** (Approve national CSR guidelines and assist with their local implementation)
- **Local CSR Committees of Group institutions** (Monitor and coordinate local implementation of the CSR policy).

Groupe BPCE adopted a Group code of conduct and ethics in 2018. It sets out the Group’s ethical standards in three areas: the interests of customers, employer responsibility and social responsibility, with practical business-oriented examples.

The **Natixis’ Code of Conduct** provides a comprehensive framework of the rules and guidelines that apply to every employee in four main fields: be client-centric, behave ethically individually and collectively, act responsibly towards society, protect Natixis and Groupe BPCE assets and reputation.

Since the end of 2020, Natixis has set up a new governance of its environmental and social responsibility (ESR) strategy, including:
- **ESR Committee at Board level** that oversees the sustainability strategy,
- **ESR Committee at executive management level** that effectively oversees implementation of the Principles,
- **Sponsor Committee** (directors of business lines and support functions),
- 2 **Steering Committees** (one focused on direct impact and onboarding issues, and one focused on business development and risk management).
This new governance structure fully supports the implementation of the Principles, through validation and monitoring of the sustainability business strategy, development of a complete ESG risk framework, implementation of sectorial policies and staff onboarding.

Policies (including sectorial policies) and procedures (in particular through the GWF and the ESG Risk Screening tool) were developed to take sustainability issues into account systematically in the bank’s lending and KYC processes.

5.2 Describe the initiatives and measures your bank has implemented or is planning to implement to foster a culture of responsible banking among its employees. This should include a high-level overview of capacity building, inclusion in remuneration structures and performance management and leadership communication, amongst others.

For the Groupe BPCE, the culture of responsible banking among its employees is very important:
- employee training via an e-learning course for the Groupe BPCE code of conduct and ethics
- CSR trainings on specific topics
- meetings or webinars on specific topics about CSR
- publishes a “Live Green and CSR” newsletter, a CSR watch
- on the Group’s CSR publications on social networks, posts in the Yammer groups (CSR, Green Growth, Green IT, climate risks, sustainable finance);
- runs a dedicated intranet site.

Natixis: Several initiatives are implemented to foster a culture of responsible banking amongst employees:
- All staff are required to complete mandatory training on the Code of Conduct.
- An e-learning on environmental and social responsibility, and the implementation of ESR within Natixis is currently being finalized, it will become mandatory for all staff in 2021.
- Regular trainings on sustainable business topics are delivered internally for front officers of the bank (organised by the Green & Sustainable Hub).
- Sustainable criteria are factored into Natixis’ compensation policy:
  - In the Chief Executive Officer’s variable annual compensation,
  - In the Senior Management Committee members’ compensation,
  - In the Natixis’ profit-sharing agreement,
  - In certain Natixis subsidiary incentive schemes,
  - In savings schemes.

Please refer to Groupe BPCE 2020 Universal Registration Document (URD), sections:
2.2.4 Identifying and managing risks to ensure our development
2.4 Being a responsible group in its internal and external practices

Please refer to Natixis’ 2020 Universal Registration Document (URD), sections:
6.1.2 ESR governance
6.2 Conduct
6.7.1.7 Compensation policy
### 5.3 Governance structure for implementation of the Principles

*Show* that your bank has a governance structure in place for the implementation of the PRB, including:

- **a)** target-setting and actions to achieve targets set
- **b)** remedial action in the event of targets or milestones not being achieved or unexpected negative impacts being detected.

The governance structure supports the implementation of the Principles for the **Groupe BPCE**.

Please refer to the governance described in section 5.1 herein, set up by **Natixis** since the end of 2020.

This new governance structure fully supports the implementation of the Principles:

- The ESR Committee at executive management level (to which Natixis’ CEO is a member) is responsible for the effective implementation of the Principles, including in particular for targets to be set, and actions to be implemented in order to reach targets set.
- A regular reporting (at least annually, and for some issues quarterly) is being provided by operational teams to members of the ESR Committee to monitor the achievement of targets.
- The 2 Steering Committees are responsible for proposing remedial actions in the event targets cannot be met or negative impacts arise from previous decisions. Depending on the level of importance, such proposition may be validated at Sponsor level, at executive management level, or even at Board level if necessary.

Please refer to Groupe BPCE 2020 Universal Registration Document (URD), sections:

- 2.2.4 Identifying and managing risks to ensure our development

Please refer to Natixis’ 2020 Universal Registration Document (URD), sections:

- 6.1.2 ESR governance
- 6.4.2.1 GWF: an innovative solution for a greener loan book
- 6.5.1 Incorporating ESG criteria in financing operations and investments

Please provide your bank’s conclusion/ statement if it has fulfilled the requirements regarding Governance Structure for Implementation of the Principles.

**Groupe BPCE and Natixis** have fulfilled the requirements regarding Governance Structure for Implementation of the Principles.

Sustainability is fully embedded in strategy and governance through dedicated committees, sector policies, lending issuance, KYC process trainings and compensation policies.

### Principle 6: Transparency & Accountability

*We will periodically review our individual and collective implementation of these Principles and be transparent about and accountable for our positive and negative impacts and our contribution to society’s goals.*

<table>
<thead>
<tr>
<th>6.1 Progress on Implementing the Principles for Responsible Banking</th>
<th>Groupe BPCE with Natixis is actively involved in the implementation of the Principles.</th>
</tr>
</thead>
</table>
| Show that your bank has progressed on implementing the six Principles over the last 12 months (up to 18 months in your first reporting) | **1- Alignment**

**The group** is committed to developing its activities to achieve SDGs and increased the development of sustainable finance products and services throughout its businesses with a responsible and constructive approach for its customers and others stakeholders. 9 priority SDGs are positively impacted by the actions of the group in its businesses and operations. |

Please refer to Groupe BPCE 2020 Universal Registration Document (URD), sections:

- All section mentioned above and in particular 2.2.3 Measuring our performance where we can find “our achievements in 2020”
after becoming a signatory) in addition to the setting and implementation of targets in minimum two areas (see 2.1-2.4).

Show that your bank has considered existing and emerging international/regional good practices relevant for the implementation of the six Principles for Responsible Banking. Based on this, it has defined priorities and ambitions to align with good practice.

Show that your bank has implemented/is working on implementing changes in existing practices to reflect and be in line with existing and emerging international/regional good practices and has made progress on its implementation of these Principles.

Of course, its analysis identified two types of strategic goals to have a good view:

- the SDGs for which BPCE makes a positive contribution, i.e. action taken by the Group to facilitate the achievement of the goals by 2030;
- the SDGs for which BPCE has taken action to minimize its identified risks.

Natixis is committed to developing its activities to achieve SDGs. Our contribution to these objectives is detailed throughout our 2020 Non-financial performance report (chapter 6 of URD 2020).

In 2020, Natixis contributed to 13 of the 17 UN SDGs.

2- Impact & Target Setting

The new ambitions will be presented in the Group’s future strategy shortly. Actions, targets, indicators, and measure will be disclosed.

Natixis has set several SMART targets objectives on biodiversity in 2020 as part of its act4nature international commitment. In addition, Natixis increasingly uses the GWF tool to monitor the climate impact of its financing.

Climate is a significant impact area for which more detailed targets will be set in 2021. Other ESG issues have been increasingly covered thanks to the development of the ESG Risks Screening tool (including human rights) when impacts are material.

3- Customers & Clients

Groupe BPCE accelerated the momentum that the group’s companies have committed for several years in favor of an economy more sustainable and more inclusive finance at the service of our customers and society.

Commitment welcomed by the extra-financial rating Eiris Vigéo and since this year CDP, which place us among the leaders of the banking sector.

The main challenge for a bank of Groupe BPCE’s size is to be able to incorporate environmental issues into its customer relations. This year, the Groupe BPCE works on the development of a differentiating product and service offering (like Ambition durable https://newsroom.groupebpce.fr/actualites/le-groupe-bpce-lance-ambition-durable-une-obligation-verte-green-bond-a-destination-des-clients-particuliers-des-banques-populaires-et-des-caisses-depargne-719d-7b707.html), on the expertise, and

Please refer to Natixis’ 2020 Universal Registration Document (URD), sections: all sections mentioned above
the establishment of an organization to support the development of green markets. In 2020, Groupe BPCE continued its actions in terms of inclusive finance for “vulnerable” customers (OCF), prevention of the risk of over indebtedness, personal or professional microloan, and accessibility for customers with disabilities, (...).

Client engagement of Natixis has been reinforced over the past 18 months on climate-related and biodiversity-related issues thanks to the systematic use of the GWF in Natixis’ credit process. The bank also strongly increased the development of sustainable finance products and services throughout its businesses.

4- Stakeholders

Groupe BPCE interacts with its stakeholders in the course of its business. Please note, the Cooperative shareholders among Banque Populaire customers and Caisse d’Epargne customers.

Groupe BPCE and Natixis consults also, collaborates, and engages with numerous stakeholders, including NGOs, associations of extra-financial rating agencies, its clients, its Independent Third-Party Organization.

5- Governance & Culture

In order to consolidate the Group’s commitment to CSR, CSR governance was simplified at the end of 2020 with the creation of a central Group CSR department and committees chaired by it. One of the missions of the new Group CSR Department is to help steer, define and implement the Group’s strategic ambitions in terms of environmental transition. The CSR businesses (CSR BPA, CSR Natixis, CSR SEF) are essential relays on the Group CSR Department.

The ESR governance newly set up by Natixis is fully in charge of the implementation of the Principles. Trainings on sustainable issues are regularly implemented within the bank to increase the skills of Natixis’ employees.

6- Transparency & Accountability

In 2020, for its first assessment by CDP, Groupe BPCE obtained a rating of A-, one of the highest in the banking sector.
With the integration of environmental, social and governance factors into its strategy and operations is recognized by extra-financial rating agencies. Groupe BPCE is one of the best rated banks (data : 31/12/2020) : C-Prime by ISS ESG, AA by MSCI, 64/100 average performer by Sustainalytics, 60/100 advanced by V.E.

The CSR’ Report ( or DPEF, the consolidated statement of non-financial performance included in the Group management report DPEF), is appointed as an independent third party (Deloitte & Associés). Statutory Auditors provide a basis for a limited assurance conclusion (a higher level of assurance would have required us to carry out more extensive procedures).

**Natixis** has included progress on implementing the Principles and other voluntary commitments in the Non-financial performance report it releases every year as part of its annual reporting (2020 URD) in accordance with European Directive 2014/95/EU. A limited assurance is provided on the content of this document by a third-party auditor.

Please provide your bank’s conclusion/statement if it has fulfilled the requirements regarding Progress on Implementing the Principles for Responsible Banking.

**Natixis** has fulfilled the requirements regarding Progress on Implementing the Principles for Responsible Banking: progress on implementation is included in its audited Non-financial performance report part of its annual reporting (2020 URD).

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**Annex: Definitions**

a. **Impact**: An impact is commonly understood as being a change in outcome for a stakeholder. In the context of these Principles this means (aligned with GRI definition) the effect a bank has on people/the society, the economy and the environment and with that on sustainable development. Impacts may be positive or negative, direct or indirect, actual or potential, intended or unintended, short-term or long-term.

b. **Significant Impact**: Impact that in terms of scale and/or intensity/salience results in a particularly strong/relevant change in outcome for a stakeholder. In the context of these Principles, the concept of *significant* impact is used to ensure banks focus where their actions/business (can) matter most for people, economy and environment and to provide a reasonable and practical threshold for what issues need to be considered included, similar to the concept of “materiality”.”