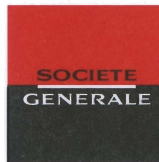


## Global Compact – Progress Report 2004

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CORPORATE SECRETARIAT

I am pleased to present this « progress report », which describes the concrete steps the Société Générale Group is taking to respect its obligations under the Global Compact.

Our signature of the Global Compact in 2003 demonstrates our commitment to supporting human rights, preserving the environment and tackling corruption in the framework of our activities. We strive to implement the principles of the Global Compact in all aspects of our business, in our relationships with our clients and with society as a whole, and through our products, services and action.

Our commitments under the Global Compact are fully consistent with our corporate values and are reflected in our actions.

As the Group continues to grow, and pursues its international expansion, we are stepping up our action in the field of social and environmental responsibility, in order to take into account the expectations of our shareholders, clients, employees, suppliers and the community.

Société Générale has effectively implemented the organization and resources required to meet the new challenges we face in a complex, diverse world.

Christian SCHRICKE

**HUMAN RIGHTS**

**Principle 1:** *“Businesses should support and respect the protection of internationally proclaimed human rights;”*

**Principle 2:** *“Businesses make sure that they are not complicit in human rights abuses.”*

For many years Société Générale has led an active policy to ensure respect for human rights in countries where it operates and control and reduce its environmental impact. The Group seeks to leverage its financing and investment activities in order to promote sustainable development.

**Procedures to evaluate the social, ethical and environmental impact of a project**

In order to promote human rights in the countries in which it operates, Société Générale has introduced procedures to examine in advance whether potential financing projects respect these basic principles. The Group has launched a project to incorporate SEE (Social, Ethical and Environmental) criteria into its financing projects and create a system to classify project financing on the basis of social, ethical and environmental risks. This initiative is based on the practices recommended by international French institutions.

The risk category assigned to a financing project determines the specific manner in which it must be treated: depending on the category, the business line organising the financing may be required to carry out additional studies or consider other alternatives, including, potentially, the rejection of the project. This classification will enable Société Générale to increase its economic efficiency when setting up financing projects, as it will systematically apply social and environmental analysis procedures to the most sensitive projects.

The Group also employs a number of internal environmental specialists who assist the business lines in implementing the sector-specific procedures applicable to particular financing projects. The business lines may also request help from external specialist agencies.

**Ensuring the protection of all employees**

According to the Global Compact, respecting human rights also means providing good working conditions for employees and guaranteeing their safety in the workplace.

For Société Générale, the protection of its employees is a priority, and its efforts in this field often go beyond the scope of local legal obligations. The Group has also implemented a policy of risk prevention aimed at reducing the number of accidents in the workplace. Thanks to the prevention programmes organised for employees, the number of reported accidents has fallen since 2003. In 2004, the Group also organised specific training to teach branch employees the basic procedures to follow in the event of a hold-up.

## **LABOUR STANDARDS**

**Principle 3: *"Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;"***

As a result of the increasing internationalisation of banking activities over the last two decades, and the Group's sustained acquisition policy since 1997, Société Générale has had to make radical changes in its human resources management. Total headcount has almost doubled in the past six years, and women now represent over 50% of the overall workforce.

Faced with this diversity of cultures, skills and profiles, the Group has taken steps to promote in-depth dialogue with its employees and their representative bodies.

### **Fostering in-depth social dialogue**

Communication, negotiation and the provision of information to employees: these are just some of the forms of dialogue the Company aims to maintain through the following bodies:

- European Works Council, Group Committee, the Central committee for the inter-union agreement on social and economic union (CCUES), Establishment Committees, Organisation Committees, the Committees for health, safety and working conditions (CHSCT), etc.;
- Meetings with trade union organisations;
- Internal Equality Commission (CPRI);
- Board of Directors.

The Group signed around 100 agreements in 2004, including 15 agreements or amendments in France covering remuneration, working hours, employee representative bodies and their access to the intranet and email, and the life assurance and complementary pension schemes.

### **Annual social environment survey**

In 2004, as every year, Société Générale carried out a social environment survey of 1,400 employees in France, with the help of a specialist external company to ensure confidentiality.

The Group will use the main findings of this survey to make appropriate changes to its social policies.

## **LABOUR STANDARDS**

**Principle 4:** *"The elimination of all forms of forced and compulsory labour;"*

**Principle 5:** *"The effective abolition of child labour;"*

As Société Générale operates in the services sector, principles 4 and 5 of the Global Compact essentially apply to staff employed by its suppliers rather than its own workforce.

Société Générale's policies and actions relating to these two principles are presented under principle 8; in particular, the Group signs contracts with all its suppliers specifically prohibiting the use of forced or child labour.

## **LABOUR STANDARDS**

**Principle 6:** *"The elimination of discrimination in respect of employment and occupation"*

Société Générale firmly believes that staff diversity, in line with its French model, is a key factor in sustaining creativity and competitiveness.

### **Signature of the Diversity Charter**

In 2004, Société Générale joined 35 other major companies in signing the Diversity Charter . Proposed by the Montaigne Institute in France, the Charter includes six commitments:

- To alert the managers and staff involved in recruitment, training and career management to the issues of non-discrimination and diversity;
- To respect and promote the application of the non-discrimination principle in all its forms and at all stages of human resources management, notably recruitment, training, career advancement and promotion;
- To seek to reflect the diversity of French society at all levels of the workforce, notably its cultural and ethnic diversity;
- To convey our commitment to non-discrimination and diversity to all our employees and advise them on the practical implications of this commitment;
- To design and implement a policy of diversity and make it a subject of dialogue with employee representatives;
- To include a chapter in the annual report describing our commitment to non-discrimination and diversity (actions implemented, practices and results).

## **Working in close conjunction with the ANPE (French national employment agency)**

In France the Group has also signed an agreement with the ANPE to promote a recruitment policy that reflects the diversity of French society. Under this initiative, a total of 55 employees were hired in 2004.

## **Integration of handicapped workers**

The Group currently employs 1,649 handicapped people worldwide. In France, Société Générale continues to work actively with an enterprise agency to retain and recruit disabled staff. The Group employs more than 1,000 people registered with Cotorep<sup>1</sup> or receiving disability benefit and continues to encourage the use of *Centres d'Aide par le Travail* (centres offering tailored solutions to enable handicapped people to work) for activities such as mailing, the production of welcome packs, etc.

## **ENVIRONMENT**

**Principle 7: *"Businesses should support a precautionary approach to environmental challenges;"***

Société Générale aims to apply a precautionary approach to its project financing activities. It has developed sector-specific procedures to assess all project proposals in advance and notably evaluate their environmental impact. Each project is then classified according to the level of risk it poses, and additional studies are carried out if deemed necessary (see Principle 1).

## **Environmental consulting engineers to assess the impact of financing projects**

The Group's business lines and risk analysts often request the assistance of internal consulting engineers in assessing financing transactions. With their extensive industrial experience, these experts play a valuable role in determining a client's potential exposure to sustainable development risks. In cases where a transaction is deemed particularly sensitive (involving large amounts, in a sensitive location, etc.), the Group may also commission an external audit. The internal consulting engineers design specific tools for the assessment of environmental and social concerns and assist the operational staff in their use:

- "environment" guides listing the main environmental risks associated with each sector of activity;
- an internal environmental questionnaire that serves as a diagnosis tool in the analysis of loan applications.

In 2004, more than 50% of structured finance projects were evaluated beforehand to determine their potential social and environmental risks.

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<sup>1</sup> *Commissions Techniques d'Orientation et Reclassement Professionnel* (technical commissions for career orientation).

## ENVIRONMENT

### **Principle 8: *“Undertake initiatives to promote greater environmental responsibility;”***

Société Générale has developed an active policy for promoting sustainable development both internally, among its employees, and in the wider community, in particular with its suppliers. The Group takes part in their training and awareness of environmental concerns, and also communicates on its own performance in this field.

#### **Alerting employees to sustainable development issues**

Société Générale raises all its employees' awareness of sustainable development issues. It organises conferences based on the subjects of energy, fair trade, microfinance and relationships with NGO's. The Group has distributed brochures answering specific questions on the use of recycled paper by employees: what is recycled paper, why use it, does the manufacture of recycled paper create more pollution than normal paper, its production cost, etc. It has also published a guide for employees with ideas on how to respect the environment and the community during their holidays (entitled "The sustainable family on holiday").

#### **Encouraging suppliers to develop good environmental and social practices**

Société Générale consider that its purchasing policy is a leverage to encourage the adoption of responsible social and environmental practices. In this way, it includes a CSR questionnaire in all calls for tender in order to assess the practices of potential suppliers to social, ethical and environmental criteria. The questionnaire is accompanied by a list of Société Générale's commitments with respect to human rights, labour rights, the environment and the prevention of corruption.

Since 2003, new contracts signed with suppliers have included CSR clauses that commit them to respect principles of social and environmental responsibility. In 2004, the Group carried out an initial internal audit to review existing agreements.

Each year, the Group examines different areas of its purchasing policy to find ways to improve its contribution to the environment. Its initiatives for 2004 included the following:

- launch of a debit card that consumes less chlorine;
- increase in the proportion of "green" electricity, produced from renewable sources, purchased from EDF for Tour Société Générale from 15% to 21%;
- general implementation of a policy for recycling electronic and IT equipment at the end of its useful life.

## **The first Greenhouse Gas (GHG) Emissions Assessment**

Société Générale carried out its first GHG Emissions Assessment at its central offices from October 1<sup>st</sup> 2003 to September 30<sup>th</sup> 2004. Conducted by an external specialist using the methods defined by Ademe<sup>2</sup>, this detailed analysis looked at actual consumption over a broad scope of activities, including depreciation and deliveries<sup>3</sup>.

Although further limited cuts can still be made in GHG emissions and energy use, it was clear from the assessment that the Group has already adopted a number of commendable practices: increased use of remote conferencing equipment such as videoconferencing, timer switches on lights and computer equipment, ...

The main area for improvement now is transportation (accounting for 36% of total emissions), where business trips could be reduced and cleaner forms of transport used.

## **Practices to control the use of natural resources and production of waste**

Over the past decade, the Group has implemented a number of techniques to moderate consumption of resources at its central offices:

- thermal regulation devices;
- since 1995, the Group's IT centres have introduced systems to reuse the heat given off by computer equipment, and now cover 95% of the heating requirements, saving 6.5 GWH per year;
- steps have been taken to reduce paper consumption. For example, internal publications were cut by 18% in 2004 or some 9 million pages;
- since 1997, the Group has developed a formal system for managing its waste production, monitored by a dedicated department.

## **Sustainable development project in Cameroon**

Société Générale de Banques au Cameroun (SGBC) has signed a partnership agreement with an NGO to support the major "Garoua elephant camp" project. The aim is to enable local populations to remain in close proximity to the Bénoué National Park (a protected biosphere region classified by UNESCO in 1981), without endangering the ecological balance of the region. The programme is encouraging the elephant population to return to the site and is carrying out research into the region's wildlife. SGBC is conducting a national awareness campaign to highlight the work of the programme.

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<sup>2</sup> Agence de l'Environnement et de la Maîtrise de l'Energie (Environmental and energy management agency).

<sup>3</sup> Depreciation of buildings, fixtures and fittings, IT equipment and vehicles over their accounting life (20 years, 5 years, 2 years).



## **ENVIRONMENT**

### **Principle 9: *“Encourage the development and diffusion of environmentally friendly technologies”***

As Société Générale's direct environmental impact remains modest in comparison with the industrial sector, its influence on the environment is primarily indirect. For example, the Group is involved in environmentally-friendly financing, develops “responsible” financial products, and finances and acquires stakes in microfinance institutions.

#### **Environmentally-friendly financing**

Société Générale arranged the financing of two wind farms, les Eoliennes de la Haute-Lys and les Eoliennes de l'Argonne/Côtes de Champagne, representing the total amount of EUR 92 million, and a financing amount of EUR 77 million. Crédit du Nord also financed a wind farm at Saint-Simon, which came on stream in 2004. These three projects account for nearly one-third of France's total wind energy (260 MWh in June 2004).

Société Générale has also financed waste-to-energy facilities, including:

- household waste incineration plants in Nîmes and in Rambervillers, representing total financing of more than EUR 100 million (of which Société Générale financed over 65%);
- a 50 MW cogeneration plant that provides steam to the Cartiere Paolo Pigna paper mills in Italy. Société Générale is sole arranger and lender.

The Group works to promote economic development through its financing activities, notably the financing of local governments' projects for infrastructure and clean transport projects (e.g. EUR 62 million for Mulhouse's urban tramway system, financing of buses that run on natural gas and of household waste treatment plants in Nîmes). At December 31<sup>st</sup> 2004, the Group's financing commitments in France totalled EUR 7.4 billion.

Société Générale also finances clean transport projects through Sofergie - total outstanding Sofergie loans currently amount to some EUR 330 million.

The Group granted EUR 552 million of “green” financing in France in 2004.

#### **Socially responsible investment (SRI)**

SG Asset Management's (SGAM) approach to SRI meets two major strategic growth targets:

- To keep pace with the increasing demand for the creation and development of products invested exclusively in securities that meet SRI criteria;
- To focus the attention of asset management teams (analysts and fund managers) on the sustainable development issues, and encourage them to integrate these criteria into their analyses.

SG Asset Management (SGAM) aims to establish itself as a driving force for socially responsible investment, by anticipating the growing interest for this type of

investment. Since 2002, SGAM has been building up an independent expertise in this field and today has its own specialised SRI teams (2 experts in France and 2 in the United Kingdom). Furthermore, SGAM relies on the expertise of rating agencies when constructing its portfolios (Vigeo, Innovest, Safety & Environmental Risk Management Rating Agency etc.).

Today, SGAM manages more than EUR 1 billion using a variety of SRI approaches.

### **Investing in microfinance institutions**

Société Générale makes a significant contribution to the funding of microfinance institutions (MFI) through its subsidiaries in Africa and the Mediterranean Basin. It has granted specially adapted loans to a number of MFI; in 2004, they raised more than EUR 20 million in Benin, Cameroon, Jordan and Morocco.

In addition, BHFM, the international retail banking division, has been asked by UNEP-FI to participate in the "African Task Force" working group which will study the issue of microfinance in French-speaking Africa in 2005/2006.

On the strength of its experiences and the favourable feedback it has received, Société Générale has decided to step up its initiatives in microfinance.

## **PREVENTION OF CORRUPTION**

**Principle 10: *"Businesses should work against all forms of corruption, including extortion and bribery."***

Compliance has always been one of the Bank's core values. It is not merely the responsibility of the Group's dedicated compliance officers – rather it concerns all employees and in particular the sales staff and their managers.

### **The tasks of the Compliance Department**

Société Générale has set up this approach creating a Compliance Department charged with defining the main policies, principles and procedures. It also ensures compliance with financial market regulations, and manages any conflicts of interest, proposes ethical rules to be respected by all staff, trains and advises operational staff on compliance issues and coordinates relations between Group entities and French and foreign regulators. Since 2001, the Compliance Department has also been responsible for the prevention of money laundering, in addition of its traditional tasks.

In the same year, the Department issued a Group-wide directive on the prevention of the corruption of public representatives in Europe and abroad.

In 2004, the Group created seven new dealing room positions for compliance officers, in order to strengthen its system for the prevention of compliance risks.

### **Prevention of money laundering**

In 2004, Société Générale continued its efforts to reinforce anti-money laundering measures:

- implementation of an IT tool in the French Networks to analyse the functioning of each account and detect suspicious transactions;
- acquisition of a similar tool for the retail network's foreign subsidiaries;
- acquisition of an e-learning tool on the prevention of money laundering, developed by the FBF (French Banking Federation);
- review of the directive on "the prevention of money laundering in the Group". The document now includes special controls measures covering business relations with persons who are deemed to be politically exposed by virtue of their current or previous positions, and with companies associated with these persons.

Moreover, Société Générale has defined strict rules to avoid dealing with illegitimate operations in countries considered to be tax havens by the OECD or included in the FATF (Financial Action Task Force) black list.

## Summary table

Stakeholders	Specific CSR challenges	Examples of dialogue and reporting	Global Compact Principles	GRI references	Law/Decree NRE
Public authorities (France and abroad)		<p>Consultation meetings</p> <p>Inspection and verification assignments carried out by the regulators</p> <p>Interprofessional working groups</p> <p><u>Governance and Transparency :</u> Annual General Meetings (AGM), annual report, quarterly results shareholders' meetings, Shareholders Club, Shareholders' Consultative Committee</p>	N/A	EC8/EC13 HR1/SO2/CSR5	N/A
Regulatory authorities in the countries where we operate	Contribute to the development of ethical, fair and transparent commercial practices	Roadshows, meetings with financial and non-financial rating agencies, responses to agencies' questionnaires	N/A	N/A	N/A
Professional bodies	Contribute to regulatory projects				
	Offer levels of remuneration that are sustainable in the long-term and in line with market rates as part of a global risk management strategy	<u>Compliance :</u> Work of the Compliance Department, notably the creation in 2004 of 7 dealing room positions for compliance officers. The Department has also been charged with the prevention of money laundering	GC 10	SO2/SO3/SO5	N/A
Shareholders, investors (individual and institutional)	Supply transparent information	In 2004, Société Générale continued its efforts to reinforce anti-money laundering measures: - implementation of an IT tool in the French Networks to analyse the functioning of each account and detect suspicious transactions; - acquisition of a similar tool for the retail network's foreign subsidiaries; - acquisition of an e-learning tool on the prevention of money laundering, developed by the FBF (French Banking Federation); - review of the directive on "the prevention of money laundering in the Group". The document now includes special controls measures covering business relations with persons who are deemed to be politically exposed by virtue of their current or previous positions, and with companies associated with these persons. Moreover, Société Générale has defined strict rules to avoid dealing with illegitimate operations in countries considered to be tax havens by the OECD or included in the FATF (Financial Action Task Force) black list.	GC 10	SO2/SO3/SO5	N/A
Rating agencies	Make it easier for shareholders to exercise their responsibility	In 2001, the Department issued a Group-wide directive on the prevention of the corruption of public representatives in Europe and abroad.	GC 10	SO2/SO3/SO5	N/A
International organizations and institutions	Comply with signed commitments	Participation in working groups for UNEPFI, Global Compact, OECD etc	GC 1 à 10	EN16	N/A
	Contribute to the development of global governance				

Stakeholders	Specific CSR challenges	Examples of dialogue and reporting	Global Compact Principles	GRI references	Law/Decree NRE
Customers	Satisfy the needs and expectations of customers through honest, fair and transparent business relationships  Promote the development of CSR best practices	Customer adviser meetings, telephone advisers, home banking, etc.	N/A	N/A	N/A
		Customer Relations Department, independent ombudsman since 1996	N/A	N/A	N/A
		Customer satisfaction surveys (all retail markets) at national and local level	N/A	N/A	N/A
		Implementation of procedures to check that financing projects respect human rights, employment of environmental consulting engineers to assist analysts in this approach	GC 1,2,4,5,7,8	3.13, EC1/EC2/AM3 AM1/IB1 HR1/HR2/HR6/HR7 AM3/IB3	N/A
		Development of environmentally-friendly financing, notably wind farms, waste-to-energy facilities and clean transport	GC 9	EC1/EC2/AM3 AM1/IB1	N/A
		Responsible products: promotion of a responsible investment approach that integrates other criteria of value-added for the investor. Management of the SRI fund, SGAM Invest Développement Durable. SGAM Private Equity invests on behalf of clients looking for high standards of corporate governance and ethics	GC 9	EC1/EC2/AM3 AM1/IB1 AM3/IB3	N/A
		Financing of and acquisition of stakes in microfinance institutions	GC 9	EC1/EC2/AM3/IB3	N/A
Consumer associations	Develop non-discriminatory and transparent commercial practices  Communicate on our product policy	Financial sector consultative committees	N/A	N/A	N/A
		Websites			
		Responses to requests (via the Press, Quality and Marketing Departments and the Customer Relations Department, etc.)			
Suppliers	Promote the development of CSR best practices	Calls for tender, contractual specifications (notably including environmental clauses), questionnaires for suppliers	GC 1,2,4,5,8	EC3 HR1 HR2/HR3 HR6/HR7	N/A
		Internal audit on the inclusion of social and environmental clauses in calls for tender and supplier contracts			

Stakeholders	Specific CSR challenges	Examples of dialogue and reporting	Global Compact Principles	GRI references	Law/Decree NRE
Employees	Promote the personal and professional development of our employees	<p>Individual meetings with HR managers, appraisal process</p> <p>Annual social environment survey</p> <p>Conferences on energy, fair trade, microfinance and relationships with NGOs; distribution of brochures on sustainable development, recycling of paper</p> <p>Diversity charter : 6 commitments</p> <p>GHG Emissions Assessment carried out at the central offices</p> <p>Development of practices to control the use of natural resources and production of waste at Group premises in France and abroad</p> <p>Policy on safety in the workplace (reduction in the number of accidents in the workplace, implementation of prevention programmes, notably on hold-ups etc.)</p>	<p>N/A</p> <p>GC 3</p> <p>GC 8</p> <p>GC 6</p> <p>GC 8</p> <p>GC 8</p> <p>GC 1</p>	<p>EC5 INT1</p> <p>EC5 INT1</p> <p>EC5 HR8 INT1 EC5 INT1 LA10/LA11/INT4/INT6</p> <p>EC5 EN3/EN17 INT1 EC5 EN11/EN31 EN1/EN2 INT1 EC5 HR1 INT1 LA5/LA6/LA7/LA15</p>	<p>Art. 1-4°</p> <p>Art. 1-4°</p> <p>Art. 1-6° Art. 2-6°</p> <p>Art. 1-3°</p> <p>Art 2-1°</p> <p>Art 2-1°</p> <p>Art. 1-5°</p>
Retired employees	Maintain a social link with former employees who have contributed to the Group's development	<p>The internal magazine, Sogéchos</p> <p>The pensioners' association (Amicale des retraités) is in close contact with the Corporate Resources and Human Relations Department</p> <p>The pensioners' association has access to the Company's communications resources.</p>	N/A	N/A	N/A
Employee representative bodies	Maintain in-depth social dialogue	<p>European Works Council, Group Committee, CCUES, Establishment Committees, CHSCT, etc.</p> <p>Meetings with trade union organizations</p> <p>Internal Equality Commission (CPRI)</p> <p>Signature of around 100 employment agreements throughout the Group in 2004</p> <p>Board of Directors (staff-elected directors)</p>	GC 3	HR5	Art. 1-4°
Environmental/human rights NGOs, civil society	<p>Adopt a socially responsible approach</p> <p>Comply with our commitments to the community</p>	<p>Corporate sponsorship, long-term partnerships with associations and NGOs (e.g. sustainable development project in Cameroon)</p> <p>Responses to requests (via the Press, Sustainable Development, Sponsoring Departments etc.)</p> <p>Working groups with different NGOs</p> <p>Certification of the 2004 annual report by the Statutory Auditors</p> <p>Increase in the proportion of "green" energy purchased for the Tour Société Générale from 15% to 21%</p> <p>Project for the construction of a new tower in line with HQE (high environmental quality) standards</p> <p>Recycling of electronic and IT equipment at the end of its useful life (in France)</p>	<p>GC 8</p> <p>N/A</p> <p>GC 8</p> <p>N/A</p> <p>GC 8</p> <p>GC 8</p> <p>GC 8</p> <p>GC 8</p>	<p>N/A</p> <p>N/A</p> <p>N/A</p> <p>SO4</p> <p>EC5/EN3/EN17/INT1</p> <p>EC5/INT1</p> <p>EC5/EN11/EN31/INT1</p>	<p>Art. 1-9°</p> <p>N/A</p> <p>N/A</p> <p>Art. 2-3°</p> <p>Art 2-1°</p> <p>Art 2-1°</p> <p>Art 2-1°</p>