

THE 4 THEMES AND 10 PRINCIPLES OF THE GC	THE 21 GC ADVANCED LEVEL CRITERIA	OUR COP OR NON-FINANCIAL PERFORMANCE STATEMENT
	The COP describes T mainstreaming into fi corporate functions s and business units	CSR governance: The Crédit Mutuel group operates a full range of banking and insurance activities through its five regional groups¹ and their subsidiaries. CSR is therefore organized on the basis of the local strategies of our regional groups, with national coordination in accordance with the prerogatives of the central body (pages 6-7 and 8 of the Crédit Mutuel Group Non-Financial Performance Statement).
	The COP describes value	CSR action plan:
	chain implementation	In response to societal and environmental challenges, the Crédit Mutuel group set up a specific governance structure to guide its CSR strategy and also adopted an action plan, which was co-developed with the regional groups and approved by the national executive and supervisory bodies.
		Since January 1, 2020, the CSR function of Confédération Nationale du Crédit Mutuel (CNCM) has been part of the Risk Department.
		Crédit Mutuel's consolidated 2020-2023 action plan focuses on three areas:
		 •SUSTAINABILITY - Take a long-term approach • REPORTING - Develop relevant and tangible measurement tools • CLIMATE - Align our activities with the climate goals of the Paris Agreement
		To structure its CSR and climate actions and ensure that they are carried out at the right pace, Crédit Mutuel coordinates an action plan that includes 13 project areas that resulted in a number of achievements in 2021 and early 2022 (pages 16-17 of the Crédit Mutuel group NFPS).
		Moreover, in accordance with French Law no. 2017-399 of March 27, 2017 on the duty of vigilance of parent companies and ordering undertakings, the relevant Crédit Mutuel group entities have taken measures to identify risks to and serious violations of human rights and fundamental freedoms, social rights and environmental rights, personal health and safety and the environment (page 46 of the Crédit Mutuel group NFPS). These measures are detailed in the CSR publications of Crédit Mutuel's regional groups.
		Both in banking and in its asset management business, the Crédit Mutuel group constantly reaffirms its commitment to support transitions by carefully selecting the activities and projects it finances. The Group offers a range of responsible and/or solidarity products in which customers can invest and endeavors to be an active investor in the businesses in which it holds shares on its customers' behalf. It reports on its activity in these businesses via the voting policy reports drawn up by its asset management companies, as described in the CSR publications of the respective entities (page 36 of the Crédit Mutuel group NFPS). ²
		Lastly, the Group has historically been a preferred player in regional development, agriculture, social housing and associations. To meet the needs of its customers, Crédit Mutuel is organized by market, has developed a range of solidarity products and works to combat banking exclusion (page 37 of the Crédit Mutuel group NFPS).

^{1.} Crédit Mutuel Alliance Fédérale, Crédit Mutuel Arkéa, Crédit Mutuel Maine-Anjou et Basse-Normandie, Crédit Mutuel Nord Europe and Crédit Mutuel Océan. Crédit Mutuel Nord Europe became part of Crédit Mutuel Alliance Fédérale on January 1, 2022

^{2.} Crédit Mutuel Asset Management: https://www.creditmutuel-am.eu/partage/fr/CSD-CM/CMAM/telechargements/politique-investissement-responsable.pdf
Federal Finance Gestion: https://www.federal-finance-gestion.fr/gestion.fr/gestion.fr/gestion/actifs/upload/docs/application/pdf/2022-01/rapport_lte_ffg_2021_vdef.pdf





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DROITS DE L'HOMME	Human Rights Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights, and Principe 2: make sure that they are not complicit in human rights abuses	Criterion 3: The COP describes robust commitments, strategies or policies in the area of human rights Criterion 4: The COP describes effective management systems to integrate the human rights principles Criterion 5: The COP describes effective monitoring and evaluation mechanisms of human rights integration	To protect the interests of customers, counterparties and the Group, the Confederation and the regional groups have put a structure and operational procedures in place that incorporate the applicable regulations. Examples include: Personal data protection (GDPR): The Crédit Mutuel group attaches importance to protecting the interests of its customers and members, and so takes continuous care to comply with the applicable regulations on protecting personal data. Since the entry into force of the General Data Protection Regulation (GDPR), numerous projects, procedures (confidentiality policies, monitoring of CNIL, complaints, etc.) and staff training courses have been rolled out within the Group to ensure compliance with the principles it enshrines, as regards both relations within the Group and relations with members, customers and business partners. In 2021, 79% of employees concerned received training in personal data protection (page 45 of the Crédit Mutuel group NFPS). Duty of care / Responsible purchasing: In accordance with French Law no. 2017-399 of March 27, 2017 on the duty of vigilance of parent companies and ordering undertakings, the relevant Crédit Mutuel group entities have taken measures to identify risks to and serious violations of human rights and fundamental freedoms, social rights and environmental rights, personal health and safety and the environment. For example, Crédit Mutuel Arkéa has set up a whistleblowing system exclusively for risks of serious violations of human rights and rights related to health, safety and the environment. Moreover, the Crédit Mutuel group's entities place great importance on selecting the suppliers with whom they maintain commercial relations. By way of example, Crédit Mutuel Alliance Fédérale has published a suppliers charter, which describes all the commitments that suppliers and/or service providers contracted by one or more Crédit Mutuel Alliance Fédérale entities must respect, covering human rights, labor rights, data protection, the prevention of co		



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NORMES INTERNATIONALES DU TRAVAIL	International Labor Standards Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining, Principle 4: the elimination of all forms of forced and compulsory labor, Principle 5: the effective abolition of child labor, and Principle 6: the elimination of discrimination in employment and occupations.	Criterion 6: The COP describes robust commitments, strategies or policies in the area of labor Criterion 7: The COP describes effective management systems to integrate the labor principles Criterion 8: The COP describes effective monitoring and evaluation mechanisms of labor principles integration	Pursuant to the commitments made when it signed the Global Compact, the Group respects the fundamental conventions of the International Labour Organization (ILO) on freedom of association and the right to collective bargaining, the elimination of discrimination in employment and occupation, the abolition of forced or compulsory labor, and the effective abolition of child labor. At December 31, 2021, Crédit Mutuel operated mainly in France, where 84.2% of personnel are located. Overall, 99.2% of staff members are employed in the European Union (page 46 of the Crédit Mutuel group NFPS). Positive employment policy: The Crédit Mutuel group is developing a policy of long-term employment. In France, 94% of employees are on permanent contracts. As the Group's employees are essentially based in France or Europe, national and EU legislation, together with measures taken within the business, enable staff members to enjoy a decent salary and a good level of social security and healthcare benefits (page 46 of the Crédit Mutuel group NFPS). Equality of opportunity: Aware of the issues of equality and inclusion, the "Crédit Mutuel" division signed two agreements in 2019: An agreement was signed on April 2 on equality in the workplace, aimed at familiarizing employers in the Crédit Mutuel division with these issues and putting in place concrete milestones, notably with regard to compensation, training, promotion and work-life balance; A second Crédit Mutuel sectoral agreement, signed on September 11, covers the employment and integration of people with disabilities; it also aims to improve measures concerning both the recruitment and the continued employment and support of people with disabilities. These agreements are generally followed on a voluntary basis by subsidiaries outside the Crédit Mutuel division.



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			Some regional groups also make commitments to inclusion and supporting employees. For example, on December 8, 2021, Crédit Mutuel Alliance Fédérale signed an agreement to assist employees with disabilities and employees who are caregivers. As the first level of integration is access to a job, the Group is an active recruiter in its regions				
			(page 47 of the Crédit Mutuel group NFPS).				
			Professional equality:				
			Crédit Mutuel group companies with 50 or more employees publish their gender equality index every year on March 1. Expressed as a score from 0 to 100, it is calculated on the basis of four or five indicators, depending on the size of the business (page 48 of the Crédit Mutuel group NFPS).				
			The Group also aims to be an inclusive employer. Numerous awareness-raising actions about the employment of people with disabilities were held at several federations in 2021, among them Crédit Mutuel Arkéa, Crédit Mutuel Nord Europe, Crédit Mutuel Alliance Fédérale and Crédit Mutuel Anjou. The more proactive steps taken by the various groups have enabled progress to be made in this area (page 48 of the Crédit Mutuel group NFPS).				
			Development of human capital:				
•			It follows that training is fundamental to meeting customer needs as well as possible and responding to regulatory requirements, as well as to enabling all of the Group's employees to develop their skills and their careers (more than 300 different training course are available).				
			Moreover, the Group has demonstrably made consistent efforts in training for many years, with spending on training equal to 4.8% of the payroll. On December 15, 2020, an updated Crédit Mutuel sectoral agreement on training was signed by CNCM and unanimously adopted by the six representative labor unions (page 48 of the Crédit Mutuel group NFPS).				
*			Lastly, the Group's commitment to employment issues is also demonstrated by the multiple awards it has obtained:				
			 The Crédit Mutuel group ranked first in the "Best Employers 2021" list drawn up by Capital magazine. Crédit Mutuel and CIC posted excellent performance, ranking first and second respectively in the banking and financial services sector out of a total of 18 institutions assessed; 				
			 Crédit Mutuel Nord Europe's BéoBank subsidiary again received "Top employer" certification in 2021 for the third year in a row. This certification is awarded by the Top Employers Institute, the global authority on recognizing and certifying attractive employers that honors companies that have proven that they offer their employees excellent working conditions and a high-quality working environment, and for which talent development is an absolute priority. 				



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ENVIRONNEMENT	Environment Principle 7: Businesses should support a precautionary approach to environmental challenges, Principle 8: undertake initiatives to promote greater environmental responsibility, and Principle 9: encourage the development and diffusion of environmentally friendly technologies	Criterion 9: The COP describes robust commitments, strategies or policies in the area of environmental stewardship Criterion 10: The COP describes effective management systems to integrate the environmental principles Criterion 11: The COP describes effective monitoring and evaluation mechanisms for environmental stewardship	The Crédit Mutuel group, with all its entities, has committed to several climate change mitigation and adaptation initiatives: It has been a signatory to the Global Compact since 2003 and to the Principles for Responsible Banking (PRB) since 2019. The Crédit Mutuel group was the first French cooperative bank to join the Net-Zero Banking Alliance, in May 2021. Several Crédit Mutuel group companies have been signatories to the Principles for Responsible Investment (PRI) for many years. CIC, a subsidiary of Crédit Mutuel Alliance Fédérale, has been a signatory to the Poseidon Principles since 2020. Lastly, in 2021 Crédit Mutuel Arkéa published a Task Force on Climate-related Financial Disclosures (TCFD) report. This report, which will be updated annually, aims over time to reach the highest international standard for climate-related reporting. The idea is for Crédit Mutuel Arkéa to increase the transparency of its commitments and report every year to all its stakeholders on the progress made to support the fight against global warming, in terms of its integration into group strategy, its incorporation into risk management and the results as shown by tracking and measurement indicators. (page 24 of the Crédit Mutuel group NFPS). Moreover, climate and environmental risk management is integrated into the Crédit Mutuel group's risk management system at the national level and at the level of the regional groups. The system is progressively updated based on advances in methodologies for analyzing climate risk factors and interactions with traditional risks. This is the case notably for national risk mapping, which evolves based on transition risk and physical risk monitoring metrics. This work led to the production of a climate risk dashboard, which was presented to the Group's Basel III working group and risk committee in early 2022 (page 29 of the Crédit Mutuel group NFPS). For the Crédit Mutuel group, key environmental, social and governance issues are of critical importance in its business. Both in banking and in



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		 Several Crédit Mutuel group entities have undertaken to: Divest from coal by no later than 2030 in both OECD and non-OECD countries; Apply certain criteria to oil & gas financing. This is the case at Crédit Mutuel Alliance Fédérale³ and Crédit Mutuel Arkéa,⁴ which operate specific sectoral policies; Adopt sectoral policies for sensitive sectors: Crédit Mutuel Alliance Fédérale has sector policies on mobility, mining, civil nuclear energy, defense and security and agriculture (2022),⁵ Crédit Mutuel Arkéa has adopted an agricultural and wine-growing policy (2022);⁶ Support individuals, professionals and businesses in their transitions to a low-carbon economy. 		
		These specific commitments are part of the broader strategic plans of each of the Group's entities.		
		For example, Crédit Mutuel Arkéa's 2020-2024 climate strategy is based on two lines of action: • strengthening its climate commitment vis-à-vis companies and regions, and; • integrating climate as a performance and risk factor into management of its activities.		
		Crédit Mutuel Alliance Fédérale's revised 2019-2023 strategic plan, "plus vite, plus loin!" (faster, further!), sets a target of reducing its carbon footprint by 30%, and incorporating environmental issues into its activities is one of the focal points of its sustainable development policy (page 24 of the Crédit Mutuel group NFPS).		
		Lastly, for over 15 years, the Crédit Mutuel group has also developed a responsible investment offering and reaffirmed its commitment through its asset management subsidiaries (Crédit Mutuel Asset Management, Federal Finance Gestion, Schelcher Prince Gestion, La Française, etc.). ESG integration is a central aspect of the investment process of these subsidiaries, which have dedicated research teams who analyze issuers' ESG performance. Their investment strategies are designed in such a way that investments are based on both financial and non-financial performance criteria, particularly environmental, social and governance criteria (page 36 of the Crédit Mutuel group NFPS).		
		The Group offers a range of responsible and/or solidarity products in which customers can invest and endeavors to be an active investor in the businesses in which it holds shares on its customers' behalf. It reports on its activity in these businesses via the voting policy reports drawn up by its asset management companies, as described in the CSR publications of the respective entities ⁷ (page 37 of the Crédit Mutuel group NFPS).		

^{3.} https://www.bfcm.creditmutuel.fr/fr/rsm/politiques-sectorielles/index.html

Federal Finance Gestion: https://www.federal-finance-gestion.fr/gestion/actifs/upload/docs/application/pdf/2022-01/rapport_lte_ffg_2021_vdef.pdf.

La Française: https://www.la-française.com/fileadmin/user_upload/XX3570-Politique_RSE-nov_2021_1_pdf;

Schelcher Prince Gestion: https://www.schelcher-prince-gestion.com/gestion/upload/docs/application/pdf/2019-09/politique-engagement-sp-gestion-avril-2018-final.pdf



^{4.} https://www.cm-arkea.com/banque/assurance/credit/mutuel/c_35055/fr/performance-extra-financiere

^{5.} https://www.bfcm.creditmutuel.fr/fr/rsm/politiques-sectorielles/index.html

^{6.} https://www.cm-arkea.com/banque/assurance/credit/upload/docs/application/pdf/2022-02/202202 politique agriviti.pdf

^{7.} Crédit Mutuel Asset Management: https://www.creditmutuel-am.eu/partage/fr/CSD-CM/CMAM/telechargements/politique-de-vote.pdf.

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LUTTE CONTRE LA CORRUPTION	Anti-corruption Principle 10: Business should work against corruption in all its forms, including extortion and bribery	Criterion 12: The COP describes robust commitments, strategies or policies in the area of anti-corruption Criterion 13: The COP describes effective management systems to integrate the anti-corruption principle Criterion 14: The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption	Combating corruption, fraud and unethical practices Fair operating practices should ensure that the principles of integrity and fair dealing are upheld between the business and its stakeholders, especially its customers and competitors. This is an essential part of implementing any CSR process. It covers action areas as diverse as preventing corruption, implementing responsible policies, fair communications and competition, the promotion of social responsibility in the value chain (with suppliers and subcontractors), the security of customer and employee data, market integrity and the prevention of money laundering, the financing of terrorism and fraud. Crédit Mutuel strives to conduct its business in compliance with the applicable laws and regulations, and has put a structure in place that corresponds to this objective and to its principles of proximity and subsidiarity. The organization of the compliance system is set out in a general decision passed by the Board of Directors of CNCM in order to define and lay down the scope of intervention of the compliance functions at the Confederation and regional level. The decision states that compliance risk prevention in the Group comprises the following areas in particular: • financial security (anti-money laundering and combating the financing of terrorism; compliance with embargoes, restrictive financial measures and asset freezing rules; tax compliance); • commercial practices and the protection of customers (including the protection of personal data); • rules of conduct, ethics, combating corruption and preventing conflicts of interest; market integrity. On April 7, 2021, CNCM's Board of Directors adopted a new general decision regarding the anti-money laundering/counter-terrorist financing and international financial sanctions prevention policy within the Crédit Mutuel group, the aim of which is to formalize the organization adopted in accordance with applicable regulations, in particular through the concrete establishment of responsibility-sharing betwe		



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		To protect the interests of customers, counterparties and the Group, the Confederation and the regional groups have put robust structures and operational procedures in place. Examples include:
		Preventing corruption
		Crédit Mutuel takes care to comply with the regulations on preventing corruption, including in particular Law no. 2016-1691 of December 9, 2016 on transparency, the fight against corruption and the modernization of economic life (known as the "Sapin II" Law), which came into force on June 1, 2017.
		By way of example, standards have been laid down that illustrate the various types of prohibited behaviors that are characteristic of acts of corruption or influence peddling (codes of ethics, anti-corruption guides, compliance charters).
		The Group's entities have also put in place an internal whistleblowing procedure, the purpose of which is to enable in-house, external or occasional staff to report breaches of regulatory provisions or ethical and conduct standards. It is set out in a specific procedure available to all personnel (page 43 of the Crédit Mutuel group NFPS).
		Responsible policy and lobbying commitment
		Confédération Nationale du Crédit Mutuel has put a framework procedure in place for lobbyists, which sets out the terms under which an entity must register in the digital directory maintained by the High Authority for Transparency in Public Life (HATVP) and arranges for registration to be accomplished via the General Secretariat of the central body.
		Under the applicable regulations, the Crédit Mutuel group registers legal entities in the directory of lobbyists when "a senior manager, an employee or a member, on his or her own initiative, has entered into communications with persons [public officials] at least ten times in the last twelve months" with a view to influencing one or more public decisions, in particular legislative or regulatory measures. All declarations and actions are available on the HATVP website (page 45 of the Crédit Mutuel group NFPS).



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Taking action in support of broader UN goals	Criterion 15: The COP describes core business contributions to UN goals and issues Criterion 16: The COP describes strategic social investments and philanthropy Criterion 17: The COP describes advocacy and public policy engagement Criterion 18: The COP describes partnerships and collective action	The Confédération Nationale du Crédit Mutuel, on behalf of the Group as a whole, is a signatory to the principles of the UN Global Compact (since 2003) and the UNEP-FI Principles for Responsible Banking (PRB). This strengthens and clarifies our convictions vis-à-vis the United Nations. By signing up to these principles, the Board of Directors of CNCM undertook to: Align its strategy with the United Nations Sustainable Development Goals (SDGs) and the Paris Climate Agreement, Orient its businesses towards more inclusive finance and a sustainable economy, Be transparent about the positive and negative impacts on people and the planet (page 14 of the Crédit Mutuel group NFPS). By robustly incorporating the sustainability approach into its business model, the Crédit Mutuel group has strengthened the implementation of the Sustainable Development Goals (SDGs) listed on pages 58-59 of its Statement of Non-Financial Performance. Crédit Mutuel fully adheres to and upholds the seven cooperative principles of the International Cooperative Alliance, which are supported by more than 320 organizations in 112 countries worldwide. These seven operating principles are the common denominator of all cooperatives, regardless of their business sector, and are the basis of Crédit Mutuel's actions (page 10 of the Crédit Mutuel group NFPS). Crédit Mutuel actively contributes to initiatives taken by the French and European finance sector. At the European level, the Crédit Mutuel group is a member of various professional associations and participates in the specific working groups set up by European banking organizations to contribute to the progress of the Sustainable Finance strategy. This includes the work of the EBF (European Banking Federation) and the EACB (European Association of Cooperative Banks). At the national level, Crédit Mutuel is actively involved in the work of the French Banking Federation (FBF), which has been chaired since September 2021 by Nicolas Théry, Chairman of Confédération Nationale du Crédit Mutuel, on





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CSR governance and leadership	Criterion 19: The COP describes CEO commitment and leadership Criterion 20: The COP describes Board adoption and oversight Criterion 21: The COP describes stakeholder engagement	A Communication on Engagement (COE) signed by our CEO is published together with our Communication on Progress (COP). Since January 1, 2020, the CSR function of Confédération Nationale du Crédit Mutuel (CNCM) has been part of the Risk Department. Its role is explained in the diagram below: PRINCIPLE OF SUBSIDIARITY - CONSISTENCY - COLLECTIVE MOBILIZATION EACH GROUP DEVELOPS AND IMPLEMENTS ITS CSR POLICY APPROVAL / DECISION-MAKING / MONITORING CRÉDIT MUTUEL ARKÉA CRÉDIT MUTUEL ARKÉA CRÉDIT MUTUEL NORD EUROPE* CRÉDIT MUTUEL OCÉAN CRÉDIT MUTUEL OCÉAN			
		NATIONAL CONFEDERATION Monitors and oversees climate and CSR risks Coordinates and jointly prepares the implementation of regulations and standards, and proposes adaptations to tools and governance Acts as a center for oversight, expertise and innovation for the business lines of CNCM and the regional groups Proposes a common framework of actions and promotes the sharing of best practices Represents the interests of its affiliates (professional associations, public authorities, stakeholders, etc.) * Crédit Mutuel Nord Europe joined Crédit Mutuel Alliance Fédérale on January 1, 2022. Board of Directors Risk Committee CNCM management Basel III working group (Chief Executive Officers) Climate Risk & CSR steering committee Working groups			



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		A "Climate Risk & CSR" steering committee composed of the risk management directors and/ or CSR directors of each regional group and representatives of the two information systems meets four times a year and reports to the Basel III working group, which includes the CEOs of the Groups and the CEO of CNCM. Each regional group prepares and deploys its own CSR strategy.	
		6/an BOARD OF DIRECTORS 5/an RISK COMMITTEE - Lead independent director: Philippe Galienne • Approves and rules on disagreements where required • Approves and monitors the strategy • Monitors progress of the work performed by working groups • Approves and monitors the strategy • Monitors progress of the work performed by working groups • Reports to the Basel III working groups	
		To structure its CSR and climate actions and ensure that they are carried out at the right pace, Crédit Mutuel coordinates an action plan that includes 13 project areas. Crédit Mutuel group action plan The Crédit Mutuel group's 2020-2023 action plan focuses on three areas: SUSTAINABILITY - Take a long-term approach; REPORTING - Develop relevant and tangible measurement tools; CLIMATE - Align our activities with the climate goals of the Paris Agreement.	



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		and oversee comr • it is updated anr and CNCM's bus • it is approved ar • it is overseen by	The aim of this consolidated action plan is to build collectively on the initiatives undertaken and oversee common issues (regulatory in particular): • it is updated annually based on regulations, the requirements of the regional groups and CNCM's business lines, and proposals made by the working groups; • it is approved annually by the national executive and supervisory bodies; • it is overseen by the CSR and climate risk steering committee, which provides regular updates on the status of projects to the executive and supervisory bodies.				
		It is based on: • regulations and supervisors' requirements; • goals expressed by management; • the Group's external environment; • the expectations and practices of internal and external stakeholders; • the needs and practices of the regional groups and business lines.					
		Lastly, it sets out agreed priorities for the actions to be taken. Thirteen projects have been scheduled and prioritized, with start dates from the first half of 2020 to the end of 2023.					
		THE 13 P	ROJECT AREAS OF CR	ÉDIT MUTUEL'S CON	SOLIDATED ACT	TION PLAN	
			SUSTAINABILITY	- Take a long-term app	roach		
		Governance and acculturation	2 Principles for responsible banking and the UN Global Compact	(3) Incorporating climate/ ESG into risk tools	4 Regulation	5 Control and monitoring	
		1	REPORTING - Develop rele	evant and tangible mea	surement tools		
			6 Non-financial performance statement (NFPS)	Carbon footprint	8 Inclusion in standards		
		CLIMA	TE - Align our activities w	ith the climate goals of	the Paris Agreen	nent	
		9 Identification of green assets	(10) Coal financing	CSR information on customers	Carbon measurement of financed assets (scope 3	Stress tests	
		in particular on re non-financial ratir In 2021, particular requirements in co	indicators used in the No gular exchanges with sta og agencies, investors, et emphasis was placed or onnection with the Corp édit Mutuel group NFPS	akeholders (general mace) (page 55 of the Creater the Creater the documents are sucturing the documents Sustainability Re	eetings of memk édit Mutuel grou cument in anticip	pers, NGOs, p NFPS). pation of future	

