



BNP PARIBAS

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GREEN BOND FRAMEWORK

30/04/2018



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Prospective investors should determine for themselves the relevance of such information for the purpose of any investment in such Securities together with any other investigation such investors deem necessary. In particular no assurance is given by BNP Paribas that the use of such proceeds for



any Eligible Green Assets will satisfy, whether in whole or in part, any present or future investor expectations or requirements as regards any investment criteria or guidelines with which such investor or its investments are required to comply, whether by any present or future applicable law or regulations or by its own by-laws, investment policy or other governing rules or investment portfolio mandates, in particular with regard to any direct or indirect environmental, sustainability or social impact of any projects or uses, the subject of or related to, any Eligible Green Assets.

Furthermore, it should be noted that there is currently no clear definition (legal, regulatory or otherwise) of, nor market consensus as to what constitutes, a “green” or “sustainable” or an equivalently-labelled project or as to what precise attributes are required for a particular project to be defined as “green” or “sustainable” or such other equivalent label nor can any assurance be given that such a clear definition or consensus will develop over time. Accordingly, no assurance is or can be given to investors that any projects or uses which are the subject of, or related to, any Eligible Green Assets will meet any or all investor expectations regarding such “green”, “sustainable” or other equivalently-labelled performance objectives or that any adverse environmental, social and/or other impacts will not occur during the implementation of any projects or uses the subject of, or related to, any Eligible Green Assets.

No assurance or representation is given by BNP Paribas as to the suitability or reliability for any purpose whatsoever of any opinion or certification of any third parties (whether or not solicited by BNP Paribas) which may be made available in connection with the issue and offering of any Securities and in particular with the extent to which Eligible Green Assets may fulfil any environmental, sustainability, social and/or other criteria. For the avoidance of doubt, any such opinion or certification is not, nor shall be deemed to be, incorporated in and/or form part of the Green Bond Framework. Any such opinion or certification is not, nor should be deemed to be, a recommendation by BNP Paribas and its affiliates or any other person to buy, sell or hold any such Securities. Any such opinion or certification is only current as of the date that opinion was initially issued. Prospective investors must determine for themselves the relevance of any such opinion or certification and/or the information contained therein and/or the provider of such opinion or certification for the purpose of any investment in such Securities. Currently, the providers of such opinions and certifications are not subject to any specific regulatory or other regime or oversight.

While it is the intention of BNP Paribas to apply the proceeds of any Securities so specified to Eligible Green Assets in, or substantially in, the manner described in the Green Bond Framework, there can be no assurance that the relevant project(s) or use(s) which are the subject of, or related to, any Eligible Green Assets will be capable of being implemented in or substantially in such manner and/or in accordance with any timing schedule and that accordingly such proceeds will be totally or partially disbursed for such Eligible Green Assets.

There can be no assurance that such Eligible Green Assets will be completed within any specified period or at all or with the results or outcome (whether or not related to the environment) as originally expected or anticipated by BNP Paribas and any failure by BNP Paribas to do so will not constitute an event of default (however defined) under the Securities.

Any event or failure to apply the proceeds of any issue of Securities to any Eligible Green Assets as aforesaid and/or the withdrawal of any such opinion or certification or any such opinion or



certification attesting that BNP Paribas is not complying in whole or in part with any matters for which such opinion or certification is opining or certifying on and/or any such Securities no longer being listed or admitted to trading on any stock exchange or securities market as aforesaid may have a material adverse effect on the value of such Securities and also potentially the value of any other securities which are intended to finance Eligible Green Assets and/or result in adverse consequences for certain investors with portfolio mandates to invest in securities to be used for a particular purpose.

INTRODUCTION

BNP Paribas recognises that the world is at a tipping point on sustainability. Global warming as well as resource scarcity are likely to challenge current economic models in the coming decades.

Today there is broad scientific and political consensus that the current trajectory in CO₂ emissions must be curbed before 2020 if we are to restrict global warming to a 2°C increase over pre-industrial levels. To further intensify its efforts in this area, BNP Paribas is committed to supporting the development of renewable energies by more than doubling its financing resources allocated to this sector¹.

“In this race against time, the banking and financial sector must be at the forefront of building a low-carbon economy.” **Jean-Laurent Bonnafé, CEO of BNP Paribas, December 2017**

BNP Paribas has a long standing commitment to sustainability. Since 2010, we have integrated Environmental, Social and Governance (“ESG”) factors into our risk framework for all our financing and investments across the Group. We have specific Corporate Social Responsibility (“CSR”) policies for eight sensitive sectors applying to all products and services and have integrated ESG assessment into our risk policies and monitoring tools for large corporate clients.

In testimony of this commitment to sustainability, BNP Paribas holds robust ratings with numerous extra-financial rating agencies³.

BNP Paribas Group is committed to advising and financing corporations in building resilient and sustainable business models and in particular through the Bank’s financing of assets and projects with a positive and measurable impact on the environment.

In addition, BNP Paribas is committed to meeting the requirements of institutional investors for green debt securities which demonstrates a positive impact on the environment.

By setting up a Green Bond Framework, **BNP Paribas aims at mobilizing debt capital markets** for climate change and energy transition solutions in line with the Green Bond Principles published by the International Capital Market Association, **and at offering investors further insight on BNP**

¹ Please see press-release <http://www.bnpparibas.com.sg/en/2015/11/20/bnp-paribas-dedicates-e15bn-in-financing-for-renewable-energy-and-reinforces-its-carbon-risk-management-policies/>

² Please see article https://cib.bnpparibas.com/sustain/taking-action-to-accelerate-the-energy-transition_a-3-1690.html

³ Please refer to the latest CSR presentations of BNP Paribas for an updated presentation of the extra-financing ratings and associated indexes. <https://invest.bnpparibas.com/en/latest-csr-presentations>



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Paribas' sustainability strategy in line with its commitments. BNP Paribas would intend to update the Green Bond Framework periodically at its sole discretion to reflect developments in the best practice of the Green Bond Market.



ELIGIBLE SECTORS

In accordance with BNP Paribas Group's policy to contribute to energy transition solutions and in line with the Green Bond Principles, BNP Paribas has identified sectors with a positive impact on the environment for the Green Bond Framework (the **Eligible Sectors**). The Eligible Sectors are as follows:

- Renewable Energies;
- Energy Efficiency;
- Mass and Public Transportation;
- Water Management and Water Treatment; and
- Recycling.

Within the Eligible Sectors, BNP Paribas has identified Eligible Green Assets based on its comprehensive Environmental, Social and Governance risk management framework⁴ which provides rigorous and appropriate filters⁵.

Ultimately Eligible Green Assets may be extended and diversified to include Eligible Sectors that may be added to BNP Paribas' single common pool of Eligible Green Assets as per the 'Management of the Proceed' section, subject, as the case may be, to external third parties review, all as more fully detailed in 'External review by third parties' section.

a. Renewable Energies

The Paris Agreement on Climate Change aims to limit any rise in global temperature this century to below 2°C. This will require a progressive phase out of fossil fuels, and in this context, Renewable Energies will play an instrumental role in the transition to a low-carbon economy.

The Eligible Green Assets may include assets related to the acquisition, development and operation of renewable energies such as:

- Offshore and Onshore Wind;
- Concentrated Solar Power ("CSP");
- Solar Photovoltaic ("Solar PV");
- Hydropower projects upon condition (limited to small run of river plants or in connection with the upgrade of existing assets in temperate zones and subject to a careful review by and the scrutiny of BNP Paribas CSR teams);
- Bioenergy and geothermal projects; and
- Equipment manufacturer for Renewable Energies.

⁴ Please see "Commitment 3: Systematic integration and management of environmental, social and governance risks" in Chapter 7 of the Registration document:

<https://invest.bnpparibas.com/sites/default/files/documents/ddr2016gb.pdf>

⁵ Please see 'Selection of Assets' section and Appendix for further details



b. Energy Efficiency

Energy efficiency has a vital role in steadying and reducing greenhouse gas emissions. According to the International Energy Agency⁶, the main factor behind Greenhouse Gas (“GHG”) emissions reduction is the energy intensity decrease, driven largely by energy efficiency improvements. BNP Paribas has undertaken to significantly increase its action in this sector, by following the “Financial Institutions’ Declaration of Intent on Energy Efficiency” (developed by the European Bank for Reconstruction and Development (EBRD) and United Nations Environment Programme Finance Initiative (UNEP-FI)) signed in 2015⁷.

The Eligible Green Assets may include assets related to energy efficiency such as:

- Green buildings with environmental certification such as LEED (Leadership in Energy and Environmental Design) with a Minimum of “Gold”, BREEAM (Building Research Establishment Environmental Assessment Method) with a Minimum of “very good” and in compliance with appropriate regulations;
- Retrofit commercial and public buildings (e.g. insulation of walls and roofs, LED lighting, replacement of boilers, implement energy management systems, refurbishment of heating, ventilation and air conditioning systems);
- Improved infrastructure (e.g. LED street lighting); and
- Smart grid investments for more efficient transmission and distribution of energy.

c. Mass and Public Transportation

Transport accounts for about 60% of global oil consumption and 23% of world CO₂ emissions⁸. At the same time the transport sector is essential both from a social and economic standpoint. Lowering the carbon footprint whilst developing a more efficient transport system is therefore crucial.

The Eligible Green Assets may include assets related to:

- Energy efficient public transport (eg. convert public bus fleets to alternative fuels: electric, biofuel, hybrid; subways and electric bus fleets);
- Development, operation and upgrade of rail transport for both passengers and goods;
- Transportation infrastructure (expansion of train/metro networks, projects in relation to capacity improvement, station upgrade); and
- Non-diesel rolling stock (replacement of rolling stock).

For clarification purposes, aviation and shipping are not part of the scope of Eligible Green Assets.

⁶ IEA, Energy Efficiency Market Report 2017

⁷ <http://www.unepfi.org/fileadmin/documents/DeclarationIntentEnergyEfficiencyFinance.pdf>

⁸ World Bank website, Dec.2015, <http://www.worldbank.org/en/news/press-release/2015/12/02/multilateral-development-banks-join-forces-to-ramp-up-climate-action-in-transport>



d. Water Management and Water Treatment

A 40%⁹ global water shortfall is predicted by 2030, and water demand is expected to more than double in the next fifteen years. According to the United Nations¹⁰, water scarcity is among the main problems of the 21st century.

The Eligible Green Assets may include assets related to water management and water treatment such as:

- Development, operation and upgrade of water treatment plant;
- Water use minimization;
- Leakage prevention; and
- Other water related projects including irrigation and wastewater.

e. Recycling

With population and urbanisation growing rapidly, so is the volume of solid urban waste. Today, the OECD countries produce almost half of the world's urban waste, but levels will further increase with rapid urbanisation in Africa and Asia. Waste management and recycling in particular will therefore become critical.

The Eligible Green Assets may include assets related to:

- The development, operation and upgrade of recycling and waste-to-energy power plants;
- Recycling activities for instance for metals, plastic and paper.

f. High sensitivity sectors excluded

For clarification purposes, the following sectors¹¹ are excluded from the Green Bond Framework: defence and security, palm oil, wood pulp, nuclear power generation, coal-fired power generation, unconventional oil & gas, mining and tobacco.

⁹ World Bank 2016 report *High and Dry, Climate Change, Water and the Economy*

¹⁰ <http://www.un.org/waterforlifedecade/scarcity.shtml>

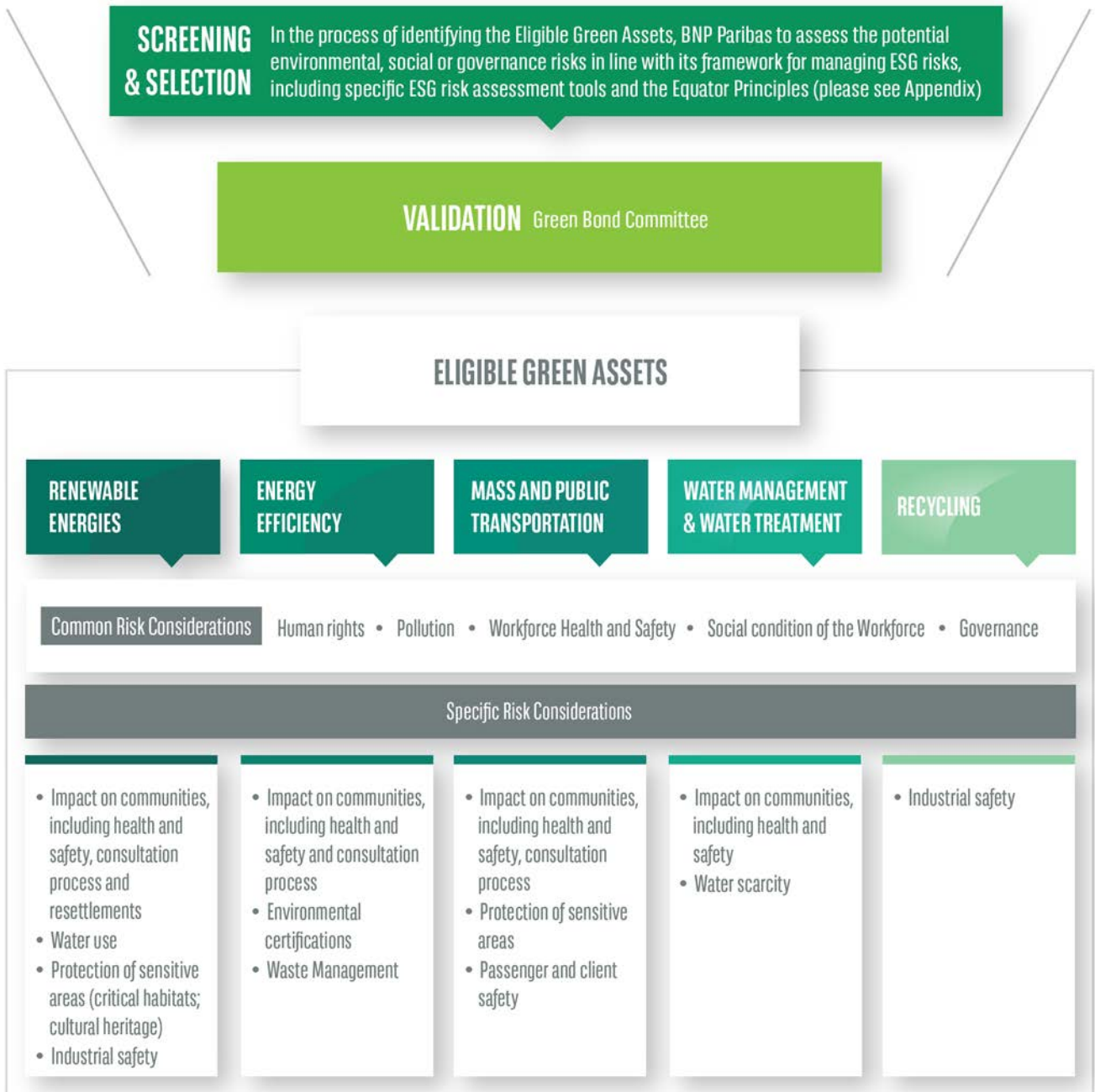
¹¹ Please see Appendix. Further details on the policy of BNP Paribas for those sectors can also be found on BNP Paribas website <https://group.bnpparibas/en/financing-investment-policies>



SELECTION OF ASSETS

a. Identification of the Eligible Green Assets

The Eligible Green Assets are sourced from the various Eligible Sectors and will be selected following the application of the Eligibility Criteria. This is a two-step process which encompasses internal screening selection and external review by third parties. Any existing, on-going and/or future loans or any other form of financing could be considered for the Eligible Green Assets.





b. Further features of the Eligible Green Assets

In addition to the previously detailed identification process of BNP Paribas highlighted above, further screening is applied to exclude:

- Non-committed transactions;
- Non-Performing Loans or loans on a watch list; and
- Assets pledged to other financing programmes.

Recognizing that Green Bond guidelines and best practices are evolving, BNP Paribas would always consider the appropriate selection criteria at the time of any Green Bond issuance and will seek to be in line with the best market practices.

EXTERNAL REVIEW BY THIRD PARTIES

The Eligibility Criteria will be further verified by the review of the external third parties designated by BNP Paribas to assess the sustainability and relevance of the criteria identified and the resulting Eligible Green Assets. External third parties can be, amongst others, independent second party opinion providers, external independent auditors and/or any other third parties deemed to be appropriate as per the Green Bond Principles. The external reviews will be available on BNP Paribas’ Investors’ website: <https://invest.bnpparibas.com/en/green-bond-issues>.

To ensure transparency, BNP Paribas will provide external third party reviews as per the table below.

		New Assets to be added in the single common pool of Eligible Green Assets	
		New Green Bond issuance ¹²	During the life of the Green Bond
Eligible Sectors	Eligibly Criteria Already reviewed	Independent review by a second party opinion provider and verification by external independent auditors*	Verification by external independent auditors of the annual reporting
	Eligibly Criteria Not reviewed		Independent review by a second party opinion provider and verification by external independent auditors*

*In this situation, the external review by third parties will be made available to investors ahead of any inclusion of new assets / new sectors.

BNP Paribas intends to have second party opinions with a similar scope and quality as for its inaugural Green Bond.

¹² For the avoidance of doubt, no dedicated second party opinion will be provided for any private placement to be done using this Green Bond Framework that will benefit from the second party opinion that will be delivered in the context of new assets to be added in the single common pool of Eligible Green Assets.



For each Green Bond issuance and as long as the Green Bonds are outstanding BNP Paribas will mandate external independent auditors to review the Eligible Green Assets. The external independent auditors will provide, on an annual basis, assurance on the allocation of the net proceeds of the Securities to Eligible Green Assets¹³, the conformity of the Eligible Green Assets with the Eligibility Criteria, the relevant impact indicators and the alignment with the Green Bond Principles.

MANAGEMENT OF PROCEEDS

a. A single common pool of Eligible Green Assets

BNP Paribas intends to accrue over time a single common pool of diversified Eligible Green Assets from the various Eligible Sectors subject to internal selection (as per the section 'Selection of Assets') and verification by appropriate independent third parties. This single common pool of Eligible Green Assets will represent all Green Bond issues under the Green Bond Framework. Ultimately Eligible Green Assets may be diversified to stem from the various Eligible Sectors that will be added to BNP Paribas' single common pool of Eligible Green Assets.

BNP Paribas will monitor the use of the net proceeds of the Securities via its internal information systems.

BNP Paribas will use its best efforts to substitute any redeemed loans or any other form of financing that are no longer financed or refinanced by the net proceeds and/or if any such loans or any other form of financing cease to be an Eligible Green Asset, as soon as practicable once an appropriate substitution option has been identified.

b. Unallocated proceeds

Pending the allocation or reallocation, as the case may be, of the net proceeds of the Securities to Eligible Green Assets, BNP Paribas will invest the balance of the net proceeds, at its own discretion, cash and/or cash equivalent and/or other liquid marketable instruments.

¹³ Please see 'Reporting / Annual reporting' section



GOVERNANCE

As an integral part of its governance for Green Bonds, BNP Paribas has set up a Green Bond Committee, bringing together various departments within the bank to supervise the issuance of the Green Bonds, the selection and monitoring of the pool of the Eligible Green Assets and to ensure the compliance of the Green Bonds with best practices.

More specifically, the role of the Green Bond Committee is:

- i) To review and validate the pool of Eligible Green Assets;
- ii) To validate the annual reporting for investors;
- iii) To review the appropriate external independent auditors' report and address any issues arising; and
- iv) To monitor any on-going evolution related to Green Bond market practices in terms of disclosure/reporting, harmonization.

The Green Bond Committee will meet on a semi-annual basis and will be chaired by the Head of Corporate Social Responsibility for BNP Paribas.

Members of the Green Bond Committee will include the following departments:

Energy and Infrastructure Financing Solutions teams: responsible for providing agreed information on the Eligible Green Assets, communicating the events that may occur on the Eligible Green Assets at deal level or on counterparties (i.e. early termination, extension...) and assisting in the selection of assets within the Eligible Sectors.

Corporate Social Responsibility teams: responsible for liaising with external third parties, including independent second party opinion providers and the appropriate external independent auditors, managing any potential controversies, for assisting in the screening of Eligible Green Assets and Eligible Sectors and preparing the reporting for investors. In his/her role as Chairman of the Green Bond Committee, the Head of CSR for BNP Paribas will have the final decision on the selection of the Eligible Green Assets.

Asset and Liability Management Treasury teams: in charge of

- i) Raising BNP Paribas Group wholesale funding on all maturities, in all currencies;
- ii) Providing a standard loan database to monitor the pool of Eligible Green Assets, to produce an amortization loan maturity schedule, to flag the Eligible Green Assets in the relevant internal system for audit trail and reporting purposes and thus preventing any double-financing of the Eligible Green Assets; and
- iii) Investing the balance of the net proceeds of the Green Bonds not yet allocated, at its own discretion, in cash and/or short term investments.

Sustainable Capital Markets: to act as an advisor and update the Green Bond Committee on best practices in relation to the Green Bond market.

Any other teams deemed necessary to be represented may also be included.



REPORTING

a. Annual reporting

As long as any Green Bond is outstanding, BNP Paribas will report at least annually on:

- i) The Eligible Green Assets financed or refinanced by the net proceeds and their relevant environmental impact indicators;
- ii) The allocation of the Securities' net proceeds to Eligible Green Assets detailing the aggregate amount dedicated to each of the Eligible Sectors; and
- iii) The balance of unallocated cash and/or cash equivalent and/or other liquid marketable instruments still held by BNP Paribas.

The annual reporting will present the aggregation of the Eligible Green Assets per Eligible Sector and per technology, where applicable, and will be subject to permitted disclosure in accordance with relevant confidentiality agreements and competition issues.

The annual reporting is intended to follow the guidelines of the Green Bond Principles, as amended from time to time, and the reference framework "Working towards a harmonized framework for Green Bond impact reporting" dated December 2015.

In particular, BNP Paribas intends to report on the impact of the Eligible Green Assets where applicable.

In the case of the Renewable Energies Eligible Sector, BNP Paribas has considered the following indicators: annual production and tons of CO₂ emissions equivalent avoided based on the EIB Project Carbon Footprint Methodologies¹⁴.

For the other Eligible Sectors where the adequate impact measurement is not the tCO₂ emission equivalent avoided, an appropriate indicator will be proposed in line with market best practices and the recommendation of the external third party mandated for the assessment of the Green Bond.

In the case of the Mass and Public Transportation Eligible Sector, the following indicators could be considered: distance travelled, traffic and estimated CO₂ emission equivalent avoided.

¹⁴ <http://www.eib.org/about/documents/footprint-methodologies.htm>



For illustration purposes, please see below an indicative report relating to the Renewable Energies Eligible and Mass and public transportation sectors:

				SPECIFIC INDICATORS ACCORDING TO SECTOR		
SECTOR	TECHNOLOGY	COUNTRIES	NUMBER OF PROJECTS	CAPACITY IN MW	ESTIMATED PRODUCTION IN GWh	ESTIMATED CO ₂ EQ. AVOIDED
Renewable Energies	CSP & Solar PV					
	Onshore Wind					
	Offshore Wind					
TOTAL						
SECTOR	TECHNOLOGY	COUNTRIES	NUMBER OF PROJECTS	ESTIMATED DISTANCE TRAVELLED	ESTIMATED TRAFFIC	ESTIMATED CO ₂ EQ. AVOIDED
Mass and public transportation	Metro Line & Rail Track					
TOTAL						

There will be a single annual report for all Green Bond issuances under the Green Bond Framework.

The first annual report was published on the anniversary date of the first issuance. Any future report will be published thereafter on the anniversary date of this first report.

The annual report will be reviewed and verified by appropriate external independent auditors.

b. Other documents

The following documents will be made available to investors and disclosed publicly on BNP Paribas Investors' website:

- Final Terms, pricing supplement, prospectus, offering circular as applicable, of the relevant Green Bond issuances;
- Green Bond Framework;
- BNP Paribas Green Bond Investor Presentation;
- Second party opinion from independent second party opinion provider;
- Assurance report from appropriate external independent auditors; and
- Annual reporting and methodology.

Link to the investor website: <https://invest.bnpparibas.com/en/green-bond-issues>



APPENDIX - BNP PARIBAS FRAMEWORK IN PLACE FOR MANAGING ENVIRONMENTAL, SOCIAL AND GOVERNANCE RISKS

BNP Paribas framework for managing ESG risks is part of an integrated risk management approach¹⁵, which has been continually developed and improved since 2010.

This approach is based on:

- The development of Corporate Social Responsibility (CSR) sector policies covering the provision of financial products and services to clients and/or projects in sensitive sectors;
- Compliance with the Equator Principles for large-scale industrial and infrastructure projects;
- The implementation of a specific environmental, social and governance risk assessment tool applied to corporate clients in 10 sectors not covered by CSR sector policies within BNP Paribas CIB;
- An internal CSR Exclusion and Monitoring List with companies that either are in breach of BNP Paribas' commitments or present ESG issues that require particularly careful due diligence and follow up; and
- The integration of ESG due diligence in the Global Credit Policy and in the standard decision-making processes of the Bank.

This framework, in place since 2010, was further strengthened with the following measures:

- Strengthening of its carbon risk management;
- Exclusion of the tobacco sector

a. Sector policies

Some sectors present major ESG challenges and are considered highly sensitive. For these sectors, BNP Paribas has implemented comprehensive policies with clear mandatory requirements and evaluation criteria covering the provision of financial products and services to corporate clients or to projects. Those sector policies allow BNP Paribas to operate in such sectors, while avoiding the worst performers and favouring the best players and companies committed to improving their practices.

At the end of 2017, BNP Paribas had eight policies covering the following sectors:

- Defence
- Palm oil
- Wood pulp
- Nuclear power generation
- Coal-fired power generation
- Unconventional oil & gas
- Mining
- Agriculture

¹⁵ Please see in Chapter 7 of the Registration document

<https://invest.bnpparibas.com/sites/default/files/documents/ddr2016gb.pdf>



Developed in cooperation with internal and external experts, taking into account the opinions of a wide range of different stakeholders, these public policies apply worldwide to all of the BNP Paribas Group's entities and business lines. In 2016, BNP Paribas reviewed 1109¹⁶ transactions to check their compliance with these policies and other frameworks.

The sector policies are available on our corporate website:
<https://group.bnpparibas/en/financing-investment-policies>

b. Equator Principles

BNP Paribas adopted the Equator Principles (EPs) in 2008. This landmark voluntary initiative from the financial sector is a due diligence framework process applied to certain financing and advisory transactions related to the development of infrastructure and industrial projects (either greenfield or when there is a significant expansion or upgrade of an existing project). Under the EPs, projects need to comply with good international practices (such as the World Bank and International Finance Corporation standards and guidelines in non "High Income OECD" countries), designed to avoid and reduce potential negative impacts on the population and the environment, and to ensure projects are developed in a responsible manner. Compliance with these standards is ensured through specific clauses in the loan documentation, and performance is regularly monitored. At the end of 2017, 92 financial institutions from 37 countries had adopted the Equator Principles.

The annual report of BNP Paribas on the Equator Principles is publicly available:
https://group.bnpparibas/uploads/file/2017_05_equator_principles_reporting_for_the_year_2016.pdf

c. Specific ESG risk assessment system for products and services

✓ Integration of ESG criteria into credit and rating policies

BNP Paribas is progressively integrating ESG criteria into its specific credit and rating policies. As of end 2016, seventeen policies incorporate ESG criteria and one was undergoing validation¹⁷. In addition to these specific policies, the general credit policy for corporate clients requires the business lines to assess how their clients manage their ESG risks (including with their main suppliers and sub-contractors), and how they responded to public controversies.

✓ The assessment of ESG risks for corporate clients

The ESG risks for CIB corporate clients belonging to sectors not covered by sector policies are assessed using the CSR Screening, a dedicated tool developed within CIB.

¹⁶ Please see in Chapter 7 of the Registration document
<https://invest.bnpparibas.com/sites/default/files/documents/ddr2016gb.pdf>

¹⁷ Please see in Chapter 7 of the Registration document
<https://invest.bnpparibas.com/sites/default/files/documents/ddr2016gb.pdf>



Through detailed sector-specific questionnaires, this tool assesses whether companies have policies in place to address the most critical ESG risks associated with their activities. Risks reviewed include pollution and the use of natural resources, health & safety, social condition of the workforce, impact on communities, business ethics, bribery and corruption. The objective of this analysis is to engage in a dialogue with clients on the management of critical ESG risks and the mitigation of potential impacts.

✓ **CSR Monitoring and Exclusion lists**

Through the application of its ESG framework, BNP Paribas identifies companies that do not meet its CSR requirements (such companies are added to the CSR Exclusion list) and companies that present particular ESG risks (such companies are added to the CSR Monitoring list). Companies on the CSR Exclusion list cannot be onboarded and existing client relationships have to be exited. While it is still possible to work with companies on the CSR Monitoring list, they are subject to a specific due diligence process to ensure progress is made against the identified issues, and specific transactions are subject to ad-hoc approval committees. At the end of 2016, 212 companies were on the CSR Exclusion List and 85 companies were on the CSR Monitoring List¹⁸.

d. Control plan on the ESG framework implementation

The implementation of this ESG framework in the various operating entities and geographies of the BNP Paribas Group relies on existing levels of control (such as RISK and Compliance).

In order to ensure that ESG risk management tools are strictly applied in all entities, the Group has developed a CSR operational control plan. This control plan is fully integrated into the Group's general operational control framework and is gradually transposed in the various operating entities, with the support of CSR and permanent operational control teams.

In addition, the General Inspection of the Bank is conducting periodic reviews of various business lines and coverage teams to ensure compliance with the Group procedures. These reviews also cover the implementation of the ESG framework, as and when applicable.

¹⁸ Please see in Chapter 7 of the Registration document
<https://invest.bnpparibas.com/sites/default/files/documents/ddr2016gb.pdf>