

Second-Party Opinion

BNP Paribas Social Bond Framework

Evaluation Summary

Sustainalytics is of the opinion that the BNP Paribas Social Bond Framework is credible and impactful and aligns with the four core components of the Social Bond Principles 2023. This assessment is based on the following:



USE OF PROCEEDS The eligible categories for the use of proceeds – Access to Employment, Socioeconomic Advancement and Empowerment (Equal Opportunities), Access to Affordable Housing, Access to Education, and Access to Human and Social Care – are aligned with those recognised by the Social Bond Principles. Sustainalytics considers that investments in the eligible categories will lead to positive social impacts and advance the UN Sustainable Development Goals, specifically SDGs 3, 4, 8, 10, and 11.



PROJECT EVALUATION AND SELECTION BNP Paribas has established a Social Bond Committee, which is responsible for overseeing the review and validation of eligible assets in line with the Framework's eligibility criteria. BNP Paribas has in place an internal screening process which ensures that the selected social assets comply with BNP Paribas' Corporate Social Responsibility policies and regulatory environmental and social requirements. Sustainalytics considers the project selection process to be in line with market practice.



MANAGEMENT OF PROCEEDS The Asset and Liability Management Treasury department will be responsible for the management of proceeds using a portfolio approach. The Bank will track the allocation of proceeds through an internal information system. BNP Paribas intends to allocate the proceeds to eligible assets upon issuance on a best-effort basis. Pending allocation, unallocated proceeds will be invested in cash or cash equivalents. This is in line with market practice.



REPORTING BNP Paribas intends to report on the allocation of proceeds and corresponding impact in its annual report, which will be published on the Bank's website. Allocation reporting will include the eligible social assets financed or refinanced by the net proceeds, the aggregate amount allocated to each eligible category, and the balance of unallocated proceeds. Sustainalytics views BNP Paribas' allocation and impact reporting as aligned with market practice.

Second-Party Opinion

Reviewed by:

MORNINGSTAR

SUSTAINALYTICS



Evaluation date June 6, 2025¹

Issuer Location Paris, France

Report Sections

Introduction.....	2
Sustainalytics' Opinion	3

For inquiries, contact the Sustainable Finance Solutions project team:

Siga Wu (Amsterdam)

Project Manager

siga.wu@morningstar.com

(+31) 205 602 936

Camilla Bovati (Amsterdam)

Project Support

Enrico Tessadro (Amsterdam)

Client Relations

susfinance.emea@sustainalytics.com

(+44) 20 3880 0193

¹ This Second-Party Opinion updates the Second-Party Opinion provided by Sustainalytics on 21 November 2023.

Introduction

BNP Paribas S.A. ("BNP Paribas" or the "Bank") is an international banking group headquartered in Paris, France. BNP Paribas has three major operating divisions: i) Commercial, Personal Banking and Services, which includes BNP Paribas' retail banking networks and specialised businesses, such as BNP Paribas Personal Finance and Arval; ii) Investment and Protection Services, which includes savings, investment and protection solutions; and iii) Corporate and Institutional Banking, which focuses on corporate and institutional clients. As of 2024, the Bank had approximately 178,000 full-time equivalent employees and operated in 64 countries.^{2,3}

BNP Paribas has developed the BNP Paribas Social Bond Framework (the "Framework") dated June 2025 under which BNP Paribas, BNP Paribas Emissions- und Handelsgesellschaft mbH⁴ and BNP Paribas Issuance B.V.^{5,6} intend to issue secured social standard bonds⁷ and unsecured debt securities, including bonds, certificates, notes, and public and private placements, and use the proceeds to finance or refinance, in whole or in part, existing or future assets and projects that deliver positive social impact in France, Germany and other countries. The Framework defines eligibility criteria in five social areas:

1. Access to Employment
2. Socioeconomic Advancement and Empowerment (Equal Opportunities)
3. Access to Affordable Housing
4. Access to Education
5. Access to Human and Social Care

BNP Paribas engaged Sustainalytics to review the Framework and provide a Second-Party Opinion on the Framework's social credentials and its alignment with the Social Bond Principles 2023 (SBP).⁸ The Framework has been published in a separate document.⁹

Scope of work and limitations of Sustainalytics' Second-Party Opinion

Sustainalytics' Second-Party Opinion reflects Sustainalytics' independent¹⁰ opinion on the alignment of the reviewed Framework with current market standards and the extent to which the eligible project categories are credible and impactful.

As part of the Second-Party Opinion, Sustainalytics assessed the following:

- The Framework's alignment with the Social Bond Principles 2023, as administered by ICMA.
- The credibility and anticipated positive impacts of the use of proceeds; and
- The alignment of the issuer's sustainability strategy and performance, and sustainability risk management in relation to the use of proceeds.

For the use of proceeds assessment, Sustainalytics relied on its internal taxonomy, version 1.18, which is informed by market practice and Sustainalytics expertise as an ESG research provider.

As part of this engagement, Sustainalytics held conversations with various members of BNP Paribas' management team to understand the sustainability impact of their business processes and planned use of proceeds, as well as the management of proceeds and reporting aspects of the Framework. BNP Paribas

² BNP Paribas, "Universal Registration Document and Annual Financial Report 2024", (2025), at:

<https://invest.bnpparibas/en/document/universal-registration-document-annual-financial-report-2024-pdf>

³ BNP Paribas, "The Group – BNP Paribas worldwide", at: <https://group.bnpparibas/en/group/bnp-paribas-worldwide>

⁴ BNP Paribas Emissions- und Handelsgesellschaft mbH is 100% owned by BNP Paribas S.A.. Securities issued by BNP Paribas Emissions- und Handelsgesellschaft mbH and BNP Paribas Issuance B.V are guaranteed by BNP Paribas S.A..

⁵ BNP Paribas Issuance B.V. is 100% owned by BNP Paribas S.A.. Securities issued by BNP Paribas Issuance B.V are guaranteed by BNP Paribas S.A..

⁶ BNP Paribas will be responsible for ensuring alignment of any issuances with the criteria defined in the Framework.

⁷ BNP Paribas has confirmed that: i) secured social standard bonds will be as defined in the June 2022 Appendix of the Social Bond Principles 2021; ii) proceeds from the secured social standard bonds will be exclusively applied to finance or refinance eligible assets; and iii) there will be no double counting of eligible assets under a secured social standard bond with any other type of outstanding green, social and sustainability labelled financing instruments.

⁸ The Social Bond Principles are administered by the International Capital Market Association and are available at <https://www.icmagroup.org/green-social-and-sustainability-bonds/social-bond-principles-sbp/>

⁹ The BNP Paribas Social Bond Framework is available on BNP Paribas S.A.'s website at:

<https://invest.bnpparibas/en/search/reports/documents/csr?s%5Bsubthemes%5D%5B%5D=42>

¹⁰ When operating multiple lines of business that serve a variety of client types, objective research is a cornerstone of Sustainalytics and ensuring analyst independence is paramount to producing objective, actionable research. Sustainalytics has therefore put in place a robust conflict management framework that specifically addresses the need for analyst independence, consistency of process, structural separation of commercial and research (and engagement) teams, data protection and systems separation. Last but not the least, analyst compensation is not directly tied to specific commercial outcomes. One of Sustainalytics' hallmarks is integrity, another is transparency.

representatives have confirmed that (1) they understand it is the sole responsibility of BNP Paribas to ensure that the information provided is complete, accurate and up to date; (2) they have provided Sustainalytics with all relevant information; and (3) any provided material information has been duly disclosed in a timely manner. Sustainalytics also reviewed relevant public documents and non-public information.

This document contains Sustainalytics' opinion of the Framework and should be read in conjunction with that Framework.

Any update of the present Second-Party Opinion will be conducted according to the agreed engagement conditions between Sustainalytics and BNP Paribas.

Sustainalytics' Second-Party Opinion, while reflecting on the alignment of the Framework with market standards, is no guarantee of alignment nor warrants any alignment with future versions of relevant market standards. Furthermore, Sustainalytics' Second-Party Opinion addresses the anticipated impacts of eligible projects expected to be financed with bond proceeds but does not measure the actual impact. The measurement and reporting of the impact achieved through projects financed under the Framework is the responsibility of the Framework owner.

In addition, the Second-Party Opinion opines on the potential allocation of proceeds but does not guarantee the realised allocation of the bond proceeds towards eligible activities.

No information provided by Sustainalytics under the present Second-Party Opinion shall be considered as being a statement, representation, warrant or argument, either in favour or against, the truthfulness, reliability or completeness of any facts or statements and related surrounding circumstances that BNP Paribas has made available to Sustainalytics for the purpose of this SPO.

Sustainalytics' Opinion

Section 1: Sustainalytics' Opinion on the BNP Paribas Social Bond Framework

Sustainalytics is of the opinion that the BNP Paribas Social Bond Framework is credible, impactful and aligns with the four core components of the SBP. Sustainalytics highlights the following elements of the Framework:

- Use of Proceeds:
 - The eligible categories – Access to Employment, Socioeconomic Advancement and Empowerment (Equal Opportunities), Access to Affordable Housing, Access to Education, Access to Human and Social Care – are aligned with those recognised by the SBP.
 - Under the Access to Employment category, BNP Paribas may finance or refinance loans provided to small and medium-sized enterprises (SMEs)¹¹ located in socio-economically disadvantaged areas in France. BNP Paribas defines socio-economically disadvantaged areas as regions where the unemployment rate or poverty rate falls under the worst 33.33% of all employment areas defined by the National Institute of Statistics and Economic Studies in France.¹² The Bank has responsible lending practices in place. For additional details, see section 2. Sustainalytics views the Bank's targeted approach as positive and considers that such an approach is expected to improve financial access among SMEs facing the most barriers to such access and will further support employment generation in France.
 - Under the Socioeconomic Advancement and Empowerment (Equal Opportunities) category, BNP Paribas may finance or refinance the following:
 - Loans provided to social enterprises in France under the Bank's Act for Impact programme.¹³ BNP Paribas defines an eligible social enterprise as one whose purpose

¹¹ SMEs are as defined by the European Commission at: https://ec.europa.eu/growth/smes/business-friendly-environment/sme-definition_en

¹² The methodology to define unemployment and poverty rate are based on National Institute of Statistics and Economic Studies (INSEE) which publishes and updates such data on a regular basis. More details at: <https://www.insee.fr/fr/statistiques/5039881?sommaire=5040030>. The definition of the areas is further detailed in the BNP Paribas Social Bond Framework.

¹³ Act for Impact supports social entrepreneurs in seven impact areas which include access to employment, microfinance, housing, healthcare, education and equal opportunities, protection of the environment, and measures to combat precariousness: <https://group.bnpparibas/en/our-commitments/inclusion/social-entrepreneurship>

aligns with: i) one of the purposes defined by the French Law on the Social and Solidarity Economy for social enterprises;¹⁴ and ii) the European Commission.¹⁵

- The Bank will further limit eligible social enterprises to those that are i) characterized by an explicit social mission that fulfils social or environmental needs by making goods, services or employment accessible to underprivileged or excluded populations; ii) have a viable economic model and generate at least 30% of own and recurrent business income; and iii) conduct a fair distribution of its profits by reinvesting at least 50% of the profits in the enterprise. Additionally, as per the Framework, such enterprises may include start-ups, non-profit organisations, foundations and philanthropic structures.
- Sustainalytics considers the expenditure to be impactful in delivering positive social benefits.
- Loans to microfinance institutions (MFIs) in France and other countries¹⁶ that provide financial services for people who lack access to mainstream sources of finance, particularly those that are unemployed, beneficiaries of minimum public allowances or those with incomes below the poverty line as per national definitions.
 - The eligible MFIs i) will have loan portfolios with at least 90% or above directed towards any of the above-mentioned target population; ii) will have responsible lending practices in place to prevent predatory lending and over-indebtedness; and iii) will target beneficiaries (as defined above) only in the countries where the MFIs are located.
 - The Bank will limit financing to MFIs that present a credible social mission. In countries where there is a credible national definition of social enterprise such as in France,¹⁷ eligible MFIs will be in alignment with such definitions. In countries where such definitions do not exist, Sustainalytics considers that the following measures provide adequate assurance on the social objectives and impact of the eligible MFIs: i) BNP Paribas' due diligence including social performance assessment and monitoring measures related to microfinance institutions;¹⁸ and ii) the Bank's reliance on third-party social performance assessment tools such as SPI4 and Alinus¹⁹ or certification of compliance with European Code of Good Conduct for microcredit provision.²⁰
 - Sustainalytics considers such expenditure to be impactful in improving access to financial services for the population facing socioeconomic barriers to mainstream credit facilities.

¹⁴ In accordance with the French Law on the Social and Solidarity Economy and the European Commission's definition, a social enterprise is defined as enterprises whose corporate purpose primarily satisfies at least one of the following five conditions: i) they aim to provide, through their activity, support to people in a situation of fragility either because of their economic or social situation, or because of their personal situation and particularly their needs in terms of social, medico-social or health support, or to contribute to the fight against their exclusion. These persons may be employees, users, customers, members or beneficiaries of this company; ii) they aim to contribute to the preservation and development of social ties or to the maintenance and strengthening of territorial cohesion; iii) they aim to contribute to citizenship education, in particular through popular education and the implementation of modes of participation involving, in the territories concerned, the beneficiaries of these activities. They thus contribute to the reduction of social and cultural inequalities, particularly between women and men; and iv) their objective is to contribute to sustainable development, energy transition, cultural promotion or international solidarity, as long as their activity also contributes to producing an impact either by supporting vulnerable groups, or by maintaining or recreating territorial solidarity, or by participating in citizenship education; v) their objective is to contribute to the preservation and enhancement of historic monuments and protected sites, parks and gardens. République Française, "LAW No. 2014-856 of July 31, 2014, on the Social and Solidarity Economy (1)", at: <https://www.legifrance.gouv.fr/loda/id/JORFTEXT000029313296/>

¹⁵ European Commission, "Social Enterprises", at:

https://ec.europa.eu/growth/sectors/proximity-and-social-economy/social-economy-eu/social-enterprises_en

¹⁶ BNP Paribas has communicated to Sustainalytics that it may provide financing to MFIs located in the following countries: India, Indonesia, Vietnam, Brazil, US, Morocco, Kosovo, Romania, Netherlands, Belgium and Italy.

¹⁷ République Française, "LAW No. 2014-856 of July 31, 2014, on the Social and Solidarity Economy (1)", at: <https://www.legifrance.gouv.fr/loda/id/JORFTEXT000029313296/>

¹⁸ BNP Paribas' due diligence measures ensures that the eligible MFIs: i) serve and target a majority of vulnerable, low and middle-income people; ii) show an undeniable social commitment, with distribution methods, payment schedules, guarantee policies and over-indebtedness control mechanisms that are adapted to the reimbursement capacities of the borrowers and to their low level of financial education; iii) serve clients in a responsible manner; preferably by applying the Client Protection Principles or similar guidelines where microfinance institutions are assessed based on the principles set to protect and serve responsibly low-income clients; and iv) accept to provide relevant information on a timely basis.

¹⁹ CERISE, "SPI4 Benchmarks", at: <https://cerise-spm.org/en/spi4/benchmarks-spi4/>

²⁰ European Commission, "European Code of Good Conduct for Microcredit Provision", at: <https://ec.europa.eu/social/main.jsp?catId=738&langId=en&pubId=8312&furtherPubs=yes>

- Consumer loans that are secured by property to individuals in Germany with low credit scores. Eligible borrowers will have: i) a Schufa score²¹ at or below M; or ii) a Schufa score at or below L and a monthly available budget below EUR 500.²²
 - The Bank has communicated that eligible loans will be associated with a debt consolidation solution that allows for longer maturities and lower monthly instalments for the borrowers.
 - The Bank defines the monthly available budget as the remaining funds at the borrower's disposal before debt consolidation.
 - BNP Paribas has responsible lending practices in place, including assessing a potential borrower's financial situation, repayment capacity, and understanding of the loan terms. For additional details, see Section 2.
 - The Schufa score level M represents the lowest tier for individuals without significant negative financial characteristics such as insolvency.²³ BNP Paribas has communicated to Sustainalytics that in Germany, consumer loan approvals typically require Schufa scores ranging from A to E. Scores below this range substantially reduce the likelihood of loan approval, with individuals scoring K or lower rarely receiving loans from banks or other financial institutions. The Bank has further indicated that a Schufa score of M is generally considered inadequate; borrowers with this score are often rejected by traditional lenders and, as a result, remain underserved. To specifically reach financially vulnerable individuals, BNP Paribas targets those with Schufa scores between I and L (i.e., just above M), provided they also have an available monthly budget of less than EUR 500. In this context, Sustainalytics views the Bank's focus on individuals with low credit scores as socially impactful. The associated expenditures are expected to enhance access to finance for people who face systemic barriers in the traditional lending market.
- Under the Access to Affordable Housing category, the Bank may finance or refinance mortgage loans provided through Prêt d'Accession Sociale (PAS) and Prêt à Taux Zero (PTZ) schemes in France. These loans are provided for the acquisition or construction of homes, targeting individuals and households whose income does not exceed thresholds that are defined based on the location of the dwelling and the number of occupants.²⁴
 - Sustainalytics considers it good practice to prioritise low-income populations, such as those that earn less than 80% of the area median income or marginalised populations for affordable housing projects. Sustainalytics notes that the income thresholds defined by PAS and PTZ for households in: i) Zone A and A bis (Paris and its surrounding areas), which are considered to be cost-burdened, are above 120% of the median income in France; ii) Zone B1 is above the median income in France; iii) the remaining thresholds are below median income in France.²⁵ Nevertheless, Sustainalytics considers these expenditures to be impactful as the areas where income thresholds are above the median income are considered cost-burdened. In addition, BNP Paribas follows income thresholds defined by the French Government to improve access to affordable home ownership for the targeted population.

²¹ Schufa score is a credit score widely used in Germany to assess an individual's creditworthiness. It is calculated by a private credit bureau, Schutzgemeinschaft für allgemeine Kreditsicherung, and reflects the probability of a person meeting their payment obligations. Schufa, "Scoring & data: Help with your Schufa score", at: <https://www.schufa.de/en/scoring-data/help-schufa-score/>

²² For borrowers who meet both criteria, BNP Paribas will count them only once to ensure there is no double counting of eligible loans under the Framework.

²³ Schufa & Finanzen, "Schufa-Score-Tabelle und das Scoringverfahren", at: <https://schufa-und-finanzen.net/schufa-score-tabelle-und-das-scoringverfahren/>

²⁴ The Prêt d'Accession Sociale (PAS) and Prêt à Taux Zero (PTZ) are loan programmes created by the French government to facilitate access to mortgages for first-time homebuyers. Prêt d'accession sociale (PAS) is a mortgage loan with capped interest rates. The PAS can fully finance an acquisition or a construction of a dwelling. More information available at: <https://www.service-public.fr/particuliers/vosdroits/F22158>
Prêt à Taux Zéro (PTZ) is an interest-free mortgage loan. It is granted only in addition to other loans for the acquisition or construction of a dwelling. More information available at: <https://www.service-public.fr/particuliers/vosdroits/F10871>

²⁵ European Union – Eurostat, "Mean and median income by age and sex", (2025), at: https://ec.europa.eu/eurostat/databrowser/view/ilc_di03/default/table?lang=en

- Under the Access to Education category, the Bank may finance or refinance student loans in France for students whose household has an income below the poverty threshold.²⁶
 - BNP Paribas has confirmed that the average interest rate of the student loans under the Framework is below the average rate of the “crédit de trésorerie” loans, which cover different types of consumer loans including student loans.²⁷ Additionally, the student loans offered under the Framework may also include zero interest rate loans (capped at a EUR 1,000 loan amount) and unsecured loans (loans without guarantor). Sustainalytics notes that in France, there are general legal safeguards in place to protect borrowers from predatory lending practices.²⁸ Additionally, the Bank has responsible lending practices in place. For additional details, see Section 2.
 - Sustainalytics considers that expenditures under this category can improve access to education for students who may face financial difficulties in France.
- Under the Access to Human and Social Care category, BNP Paribas may finance or refinance the following:
 - Loans to SMEs in the healthcare sector that are involved exclusively in the following activities classified by NACE Code²⁹: general medical practice activities, specialist medical practice activities, and dental practice activities. Sustainalytics notes that in France, doctors and dentists abide by the Ordre des Médecins³⁰ and Ordre des Chirurgiens-Dentistes,³¹ which prevent them from practicing any activity other than the one approved by their respective order in the healthcare sector. In addition, all services offered by such SMEs will be available to all in alignment with the national schemes which ensure that healthcare is also accessible to the poorest. For the most disadvantaged and very low-income population, services will be made available free of cost under the Complémentaire Santé Solidaire (ex-CMU-C) scheme.³²
 - Loans for the construction and acquisition of buildings, facilities and equipment related to public hospitals that are accessible to all regardless of ability to pay.
 - Sustainalytics considers these expenditures to be socially impactful, given the strong presence of a universal healthcare system for public healthcare facilities in France.
- Sustainalytics notes that BNP Paribas will exclude financing to the following sectors: defence and security, palm oil, wood pulp, nuclear power generation, coal-fired power generation, unconventional oil and gas, mining and tobacco. The Bank also provides a list of activities that will be excluded under the Framework,³³ and has communicated that it will not provide financing to SMEs that employ child labor or have poor working conditions. Additionally, for the category Access to Employment, BNP Paribas will exclude the following financial sectors based on their NACE code when the corresponding SMEs have no employees or a limited number of employees³⁴: holding; trusts, funds and similar financial entities; other financial service activities, except insurance and pension funding not elsewhere classified; other activities auxiliary to financial services, except insurance and pension funding; fund management activities; buying and selling of own real estate; rental and operating of own or leased real estate; management of real estate on a fee or contract basis.
- Project Evaluation and Selection:
 - BNP Paribas has established a Social Bond Committee that is responsible for overseeing the review and validation of eligible assets in line with the Framework’s eligibility criteria. The

²⁶ The student’s household revenue is determined by BNP Paribas’ systems and computed as the sum of monthly inflows of series of bank BNP Paribas accounts recognized as a household of the given student. The Household Poverty Threshold is based on the latest INSEE Monetary Poverty Threshold for a typical household of a couple with 2 children aged 14 years or over. This corresponds to the most common family composition as defined by INSEE at: <https://www.insee.fr/fr/statistiques/5422681>

²⁷ The average rate of loans under crédit de trésorerie is published by the Bank of France at:

<https://www.banque-france.fr/statistiques/taux-et-cours/taux-dusure>

²⁸ The interest rate is capped by the French legal “taux d’usure” which can be referenced at:

<https://www.banque-france.fr/statistiques/taux-et-cours/taux-dusure>

²⁹ Eurostat European Commission, “NACE Rev. 2 Statistical classification of economic activities in the European Community”, at:

<https://ec.europa.eu/eurostat/documents/3859598/5902521/KS-RA-07-015-EN.PDF>

³⁰ French Republic, “Public Health Code”, at: <https://www.legifrance.gouv.fr/codes/id/LEGISCTA000006198766/>

³¹ Ibid.

³² Details of Complémentaire Santé Solidaire at: <https://www.complementaire-sante-solidaire.gouv.fr/>

³³ BNP Paribas, “BNP Paribas Social Bond Framework”, (2025), at:

<https://invest.bnpparibas/en/search/reports/documents/csr?s%5Bsubthemes%5D%5B%5D=42>

³⁴ BNP Paribas confirmed this is to avoid extending financing to shell companies.

committee is chaired by the Bank's Head of Corporate Social Responsibility and consists of members from the relevant business lines, Sustainability Center – Corporate and Institutional Banking Company Engagement, Asset and Liability Management Treasury, and Global Markets – Sustainable Capital Markets departments.

- BNP Paribas has in place an internal screening process to ensure that the selected social assets comply with BNP Paribas' Corporate Social Responsibility policies and regulatory environmental and social requirements. The Social Bond Committee oversees this process. Sustainalytics considers this environmental and social risk management system to be adequate. For additional details, see Section 2.
- Based on the established process for project evaluation and selection, and the presence of a risk management system, Sustainalytics considers this process to be in line with market practice.
- Management of Proceeds:
 - The Asset and Liability Management Treasury department is responsible for the management of proceeds using a portfolio approach. The Bank will track the allocation of proceeds through an internal information system.
 - BNP Paribas intends to allocate the proceeds to eligible assets upon issuance on a best-effort basis. Pending allocation, unallocated proceeds will be invested in cash or cash equivalents.
 - Based on the presence of a tracking system and disclosure of temporary use of proceeds, Sustainalytics considers this process to be in line with market practice.
- Reporting:
 - BNP Paribas intends to report on the allocation of proceeds and corresponding impact in its annual report, which will be published on its website.
 - Allocation reporting will include the eligible social assets financed or refinanced by the net proceeds, the aggregate amount allocated to each eligible category, and the balance of unallocated proceeds. BNP will obtain an annual external verification on the allocation of the proceeds
 - Where applicable, impact reporting may include key social indicators such as the number of SMEs benefitting from the loans, the number of loans granted to impact entrepreneurs, the number of microfinance beneficiaries, the number of dwellings financed, the number of students benefitting from loans, the number of SMEs financed in the healthcare sector, and the number of public hospitals financed.
 - Based on the commitments to allocation and impact reporting, Sustainalytics considers this process to be in line with market practice.

Alignment with Social Bond Principles 2023

Sustainalytics has determined that the BNP Paribas Social Bond Framework aligns with the four core components of the SBP.

Section 2: Sustainability Strategy of BNP Paribas

Contribution to BNP Paribas' sustainability strategy

BNP Paribas' sustainability strategy focuses on five key areas: i) transition towards carbon neutrality; ii) natural capital and biodiversity; iii) sustainable savings, investments and financing; iv) circular economy; and v) combating financial exclusion.³⁵

BNP Paribas offers products and services that are intended to promote social inclusion and support human rights.³⁶ Since 1989, the Bank has supported financial inclusion through the following: i) direct financing of microfinance institutions (MFIs); ii) investments in funds that focus on financial inclusion; iii) creation and development of positive impact funds; iv) distribution of savings products dedicated to microfinance; and v) offering a complete line of basic banking services (Nickel), available to all with no minimum income

³⁵ BNP Paribas, "2025 Strategic Plan", (2022), at: https://cdn-group.bnpparibas.com/uploads/file/bnp_paribas_gts_2025_strategic_plan.pdf

³⁶ BNP Paribas, "Universal Registration Document and Annual Financial Report 2024", (2025), at: <https://invest.bnpparibas/en/document/universal-registration-document-annual-financial-report-2024-pdf>

requirements, including people facing banking exclusion.^{37,38} As of 2023, the Bank has granted EUR 1.4 billion to MFIs, benefiting 3.2 million people, of which 84% were women.³⁹ Regarding its sustainable finance objectives, BNP Paribas has committed that, by 2025, the Bank will i) reach 6 million beneficiaries through financial inclusion; and ii) provide EUR 150 billion in loans for environmental and social topics.⁴⁰ By the end of 2024, the Bank had provided sustainable loans amounting to EUR 133 billion and served 5 million beneficiaries.⁴¹

Since 2013, BNP Paribas has developed facilities dedicated to support social entrepreneurs in Europe, with a focus on France. Additionally in 2014, the Bank decided to further strengthen its support for social enterprises by creating the “Act for Impact” programme, which aggregated BNP Paribas’ existing social enterprises offerings under seven impact areas: access to employment; microfinance and support to entrepreneurship; access to housing; access to healthcare and autonomy; access to education and equal opportunities; protection of the environment; and measures to combat precariousness.⁴² The programme provides qualified social and impact entrepreneurs with access to tailored financial and non-financial products adapted to their needs, such as the following: i) a dedicated complete banking facility, including banking counsellors trained in impact business models and social entrepreneurship; ii) access to impact networks and key partners of the impact ecosystem; iii) a specific credit policy for customised financial analysis; iv) an impact measurement methodology; v) access to customised financing solutions across debt and equity investments (for example, the creation of a proprietary impact envelope and impact bonds); vi) access to the Bank’s expertise through a pro bono legal and consulting platform; and vii) opportunities for visibility (for example, through competitions and events such as MaPubici, and Vivatech).⁴³ As of December 2023, BNP Paribas had provided loans that amounted to EUR 2 billion to approximately 3,450 social enterprises in France.⁴⁴

Sustainalytics is of the opinion that the BNP Paribas Social Bond Framework is aligned with the Bank’s overall sustainability strategy and initiatives and will further its action on its key social priorities.

Approach to managing social and environmental risks

Sustainalytics recognises that proceeds from the instruments issued under the Framework will be directed towards eligible projects that are expected to have positive social impacts. However, Sustainalytics notes that such eligible projects and assets could also lead to negative environmental and social outcomes. Sustainalytics acknowledges that BNP Paribas plays a limited role in the development of the assets to be financed under the Framework but also notes that BNP Paribas is exposed to environmental and social risks associated with the mortgage loans it may finance or refinance. Some key environmental and social risks possibly associated with the eligible projects may include issues involving: i) land use and biodiversity issues associated with construction; ii) human rights; iii) data privacy; iv) predatory lending and over-indebtedness for financially vulnerable individuals; and v) community relations and stakeholder participation.

Sustainalytics is of the opinion that BNP Paribas is able to manage or mitigate potential risks through implementation of the following:

- BNP Paribas has established an ESG risk management system that assesses the borrower’s risks in relation to climate and biodiversity, health, safety, impact on communities and business ethics.⁴⁵ The system integrates ESG criteria within the Bank’s operational processes as well as in lending and rating policies.⁴⁶
- Regarding land use and biodiversity issues associated with construction, BNP Paribas has adopted a biodiversity position, affirming its commitment to analysing biodiversity-related risks and

³⁷ BNP Paribas, “2024 Microfinance Social Performance Report”, at:

https://cdn-group.bnpparibas.com/uploads/file/2024_bnp_paribas_microfinance_social_report.pdf

³⁸ BNP Paribas, “Positive Impact Business Accelerator: Activity and Social Performance Report”, (2024), at:

https://cdn-group.bnpparibas.com/uploads/file/Positive_Impact_Business_Accelerator_Activity_and_Social_Performance_Report_2024.pdf

³⁹ BNP Paribas, “2024 Microfinance Social Performance Report”, at:

https://cdn-group.bnpparibas.com/uploads/file/2024_bnp_paribas_microfinance_social_report.pdf

⁴⁰ BNP Paribas, “Universal Registration Document and Annual Financial Report 2024”, (2025), at:

<https://invest.bnpparibas/en/document/universal-registration-document-annual-financial-report-2024-pdf>

⁴¹ Ibid.

⁴² BNP Paribas, “Positive Impact Business Accelerator: Activity and Social Performance Report”, (2024), at:

https://cdn-group.bnpparibas.com/uploads/file/Positive_Impact_Business_Accelerator_Activity_and_Social_Performance_Report_2024.pdf

⁴³ BNP Paribas, “Social entrepreneurship”, at: <https://group.bnpparibas/en/our-commitments/inclusion/social-entrepreneurship>

⁴⁴ BNP Paribas, “Positive Impact Business Accelerator: Activity and Social Performance Report”, (2024), at:

https://cdn-group.bnpparibas.com/uploads/file/Positive_Impact_Business_Accelerator_Activity_and_Social_Performance_Report_2024.pdf

⁴⁵ BNP Paribas, “Universal Registration Document and Annual Financial Report 2023”, (2024), at: <https://invest.bnpparibas/en/document/universal-registration-document-annual-financial-report-2023-pdf>

⁴⁶ Ibid.

opportunities, including changes in land use, across its own operations, and those of its customers.⁴⁷ Through regular engagement, the Bank also supports its clients in their efforts to preserve biodiversity.⁴⁸

- To protect human rights, BNP Paribas is committed to adhering to the United Nations Global Compact,⁴⁹ the International Bill of Human Rights,⁵⁰ the fundamental conventions of the International Labour Organization (ILO),⁵¹ the United Nations Guiding Principles on Business and Human Rights,⁵² and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.^{53,54} The Bank's Code of Conduct outlines its commitment to: i) respect human rights; ii) consider the direct and indirect human rights impact of its activities; iii) reject any form of discrimination; and iv) act ethically with external parties.⁵⁵ The Bank protects individual clients from discrimination in accessing financial services through its Client Interest Protection policy, monitored by the compliance department.⁵⁶ Corporate clients are assessed and monitored through an ESG assessment, which covers human rights, employee health and safety and community impact.⁵⁷ Additionally, the Bank has developed a Statement on Modern Slavery and Human Trafficking to guide its actions regarding these violations.⁵⁸ Furthermore, BNP Paribas has established a whistleblower system that allows stakeholders, including employees, customers, suppliers and any other external parties, to report violations confidentially and with protection from retaliation.⁵⁹
- BNP Paribas addresses data privacy risks through its Data Protection Notice, aligned with the European General Data Protection Regulation (GDPR), which outlines how the Bank collects, uses, and processes customer data, as well as how customers can manage their data.⁶⁰ The Bank's Code of Conduct also affirms its commitment to protecting customer confidentiality, collecting data solely for professional purposes, and ensuring the proper storage, use, access, disclosure, transfer, and deletion of data.⁶¹ Additionally, the Bank mandates data protection awareness training for all employees to ensure understanding of data protection laws and their implementation.⁶² BNP Paribas has also established the Group Data Protection Office (GDPO) to support, advise on and oversee data protection activities, while identifying and implementing best practices.⁶³
- Regarding risks related to predatory lending and over-indebtedness for vulnerable individuals, the Bank complies with French regulations on the "tax de l'usure", which sets the maximum rate at which a loan can be granted to protect the borrower against excessive interest rates.⁶⁴ Additionally, BNP Paribas has adopted an internal policy for client protection, which ensures that the Bank's actions are aligned with customer needs and interests while clearly communicating product features, costs

⁴⁷ BNP Paribas, "BNP Paribas and the Preservation of Biodiversity", (2021), at:

https://cdn-group.bnpparibas.com/uploads/file/biodiversity_position_2021.pdf

⁴⁸ BNP Paribas, "BNP Paribas Environmental Framework", (2024), at:

https://cdn-group.bnpparibas.com/uploads/file/BNP_Paribas_environmental_framework_2024.pdf

⁴⁹ United Nations Global Compact, "The Ten Principles of the UN Global Compact", at: <https://unglobalcompact.org/what-is-gc/mission/principles>

⁵⁰ United Nations, "International Bill of Human Rights", at: <https://www.ohchr.org/en/what-are-human-rights/international-bill-human-rights>

⁵¹ ILO, "History of the ILO – Fundamental Conventions", at: <https://libguides.ilo.org/c.php?g=657806&p=4649148>

⁵² United Nations, "Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework", (2012), at: <https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights>

⁵³ OECD, "OECD Guidelines for Multinational Enterprises on Responsible Business Conduct", (2023), at: https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html

⁵⁴ BNP Paribas, "BNP Paribas Responsible Business Principles", at: https://cdn-group.bnpparibas.com/uploads/file/bnpp_responsible_business_principles_ven.pdf#:~:text=To%20uphold%20this%20ambition%2C%20BNP%20Paribas%20addresses%20Human,climate%20change%20in%20line%20with%20the%20Paris%20Agreement

⁵⁵ BNP Paribas, "The BNP Paribas Group Code of Conduct", (2022), at:

https://cdn-group.bnpparibas.com/uploads/file/220204_bnpp_compliance_codeofconduct_2022_eng.pdf

⁵⁶ BNP Paribas, "Corporate Social Responsibility - BNP Paribas and Human Rights", (2024), at:

https://cdn-group.bnpparibas.com/uploads/file/bnpparibas_and_human_rights.pdf

⁵⁷ Ibid.

⁵⁸ BNP Paribas, "Statement of Modern Slavery and Human Trafficking - 2024 BNP Paribas Statement", (2024), at: https://cdn-group.bnpparibas.com/uploads/file/bnp_paribas_2024_modern_slavery_act_statement_vdef.pdf#:~:text=This%20Statement%20outlines%20the%20steps%20that%20BNP%20Paribas,business%20or%20in%20any%20of%20its%20supply%20chains

⁵⁹ BNP Paribas, "Universal Registration Document and Annual Financial Report 2023", (2024), at: <https://invest.bnpparibas/en/document/universal-registration-document-annual-financial-report-2023-pdf>

⁶⁰ BNP Paribas, "Data protection notice", (2023), at: <https://group.bnpparibas/en/data-protection>

⁶¹ BNP Paribas, "The BNP Paribas Group Code of Conduct", (2022), at:

https://cdn-group.bnpparibas.com/uploads/file/220204_bnpp_compliance_codeofconduct_2022_eng.pdf

⁶² BNP Paribas, "Universal Registration Document and Annual Financial Report 2024", (2025), at:

<https://invest.bnpparibas/en/document/universal-registration-document-annual-financial-report-2024-pdf>

⁶³ Ibid.

⁶⁴ Government of France, Ministry of the Economy, Finances and Industry, "Crédits: à quoi sert le taux de l'usure", (2025), at:

<https://www.economie.gouv.fr/particuliers/taux-usure#>

and risks.^{65,66} Through its Code of Conduct, BNP Paribas commits to working with customers facing financial difficulties to find mutually beneficial solutions while ensuring fair, honest and transparent treatment.⁶⁷ BNP Paribas has also communicated to Sustainalytics that it applies additional measures for retail clients, including: i) a budget calculation rule to ensure loan affordability; ii) a 14-day statutory right of withdrawal; iii) a notarial consultation for mortgages to enhance transparency and understanding of loan terms; iv) a loan approval process reviewed by at least two employees, and in specific cases, by six; and v) an Ombudsman procedure for conflict resolution to provide an independent review.

- Regarding community relations and stakeholder participation, BNP Paribas maintains dialogue through various channels, including: i) dedicated programmes and complaint management systems for individual and small business clients; ii) ESG focused engagement with investee companies; iii) consultations with civil society organisations and local community representatives; iv) internal initiatives such as employee networks, surveys and feedback tools; and v) participation in working groups with regulatory bodies and public authorities.^{68,69}
- Sustainalytics research has identified that BNP Paribas is exposed to controversies pertaining to: i) business ethics, including anti-competitive practices; ii) quality and safety of its financial products, such as overcharging and misinforming its customers; iii) BNP Paribas' alleged financing of controversial businesses and projects with social and environmental risks; and iv) human rights risks. Sustainalytics notes that BNP Paribas has created provisions and has adequate measures in place to address these risks. Sustainalytics also notes that risks related to human rights and negative social impacts of the Bank's products were identified in countries other than those where the financing occurs, hence it will not directly impact eligible assets eventually financed under the Framework.

Based on these policies, standards and assessments, Sustainalytics is of the opinion that BNP Paribas has implemented adequate measures and is well positioned to manage and mitigate environmental and social risks commonly associated with the eligible categories.

Section 3: Impact of Use of Proceeds

The use of proceeds categories are aligned with those recognized by the SBP. Sustainalytics focuses below on where the impact is specifically relevant in the local context.

Impact of SME lending in France

France has approximately 4.2 million small and medium enterprises which account for 99.9% of all enterprises in the country as of 2024.⁷⁰ French SMEs employed 52.7% of France's workforce and accounted for 42.8% of value added in France in 2023.⁷¹ During the 2008 financial crisis, the French government created a credit mediation service to reconcile SMEs with banks and credit insurers at both the national and local level. This initiative has since served more than 23,000 enterprises and unblocked EUR 6.8 billion in credit, preserving 415,000 jobs.^{72,73}

Public support to SMEs in France is mostly managed through Bpifrance, a public development bank. In 2023, Bpifrance provided EUR 38.1 billion to 86,520 French microenterprises, SMEs and mid-sized companies, out

⁶⁵ BNP Paribas, "Universal Registration Document and Annual Financial Report 2024", (2025), at: <https://invest.bnpparibas/en/document/universal-registration-document-annual-financial-report-2024-pdf>

⁶⁶ BNP Paribas, "Our Governance - Compliance", at: <https://group.bnpparibas/en/group/our-governance/compliance#:~:text=The%20mission%20of%20the%20C2%AB%20Protection%20of%20Interests,accurate%20information%20on%20product%20features%2C%20costs%20and%20risks.>

⁶⁷ BNP Paribas, "The BNP Paribas Group Code of Conduct", (2022), at: https://cdn-group.bnpparibas.com/uploads/file/220204_bnpp_compliance_codeofconduct_2022_eng.pdf

⁶⁸ BNP Paribas, "Universal Registration Document and Annual Financial Report 2024", (2025), at: <https://invest.bnpparibas/en/document/universal-registration-document-annual-financial-report-2024-pdf>

⁶⁹ BNP Paribas, "How BNP Paribas listens to and takes into account expectations of its stakeholders", (2024), at: https://cdn-group.bnpparibas.com/uploads/file/bnp_paribas_csr_dialogue_with_stakeholders_2024.pdf

⁷⁰ OECD, 'Financing SMEs and Entrepreneurs 2024: An OECD Scoreboard', 2024, at: https://www.oecd.org/en/publications/financing-smes-and-entrepreneurs-2024_fa521246-en.html

⁷¹ European Commission, "2024 SME Country Fact Sheet – France", at: <https://ec.europa.eu/docsroom/documents/60563>

⁷² Eurofound, "Credit mediation structure, measure FR-2008-43/2616 (measures in France)", 2022, at: https://static.eurofound.europa.eu/covid19db/cases/FR-2008-43_2616.html

⁷³ Banque de France, "La médiation du crédit a traité près de 1300 dossiers en 2024, avec un taux de succès en hausse à 65%, et préservé ainsi 6000 emplois", (2024), at: https://www.banque-france.fr/system/files/2025-01/CP_2025-01-20_Bilan-mediation-2024.pdf

of which 80% were microenterprises.⁷⁴ This has been further supported by the PACTE (Plan d'Action pour la Croissance et la Transformation des Entreprises) law of 2019, which aimed to enhance SME finance through a package of measures.⁷⁵ However, microenterprises, especially those in less developed and socio-economically disadvantaged regions of France, still encounter specific difficulties due to their size, a lack of financial education in some cases, and challenges in finding collateral. Since 2016, and expanded in 2018, Bpifrance has offered online development loans from EUR 5,000 to EUR 75,000 for microenterprises to fund global investment projects.⁷⁶

Given the above context, Sustainalytics is of the opinion that BNP Paribas' financing for SMEs in socio-economically disadvantaged areas is expected to contribute to economic growth and to promote employment in France.

Contribution to SDGs

The Sustainable Development Goals were adopted in September 2015 by the United Nations General Assembly and form part of an agenda for achieving sustainable development by 2030. The instruments issued under the BNP Paribas Social Bond Framework are expected to help advance the following SDGs and targets:

Use of Proceeds Category	SDG	SDG target
Employment Generation	8. Decent Work and Economic Growth	8.3 Promote development-oriented policies that support productive activities, decent job creation, entrepreneurship, creativity and innovation, and encourage the formalization and growth of micro-, small- and medium-sized enterprises, including through access to financial services.
Socioeconomic Advancement and Empowerment	8. Decent Work and Economic Growth	8.3 Promote development-oriented policies that support productive activities, decent job creation, entrepreneurship, creativity and innovation, and encourage the formalization and growth of micro-, small- and medium-sized enterprises, including through access to financial services.
		8.10 Strengthen the capacity of domestic financial institutions to encourage and expand access to banking, insurance and financial services for all.
	10. Reduced Inequalities	10.2 By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status.
Affordable Housing	11. Sustainable Cities and Communities	11.1 By 2030, ensure access for all to adequate, safe and affordable housing and basic services and upgrade slums
Access to Education	4. Quality Education	4.3 By 2030, ensure equal access for all women and men to affordable and quality technical, vocational and tertiary education, including university

⁷⁴ Bpifrance, "Impact of Bpifrance", (2025), at: <https://www.bpifrance.com/2025/01/15/impact-of-bpifrance/>

⁷⁵ The French Ministry of the Economy, Finance and Industrial and Digital Sovereignty, "La loi PACTE: pour la croissance et la transformation des entreprises", (2019), at: <https://www.economie.gouv.fr/loi-pacte-croissance-transformation-entreprises#:~:text=Le%20plan%20d%27action%20pour%20la%20croissance%20et%20la%20jusqu%E2%80%99%C3%A0%20leur%20transmission%2C%20en%20passant%20par%20leur%20financement.>

⁷⁶ Bpifrance, "Accessing loans through Bpifrance Flash: An online solution for SMEs". (2025), at: <https://www.bpifrance.com/2025/03/26/accessing-loans-through-bpifrance-flash-an-online-solution-for-smes/>

Access to Human and Social Care	3. Good Health and Wellbeing	3.8 Achieve universal health coverage, including financial risk protection, access to quality essential health-care services and access to safe, effective, quality and affordable essential medicines and vaccines for all
---------------------------------	------------------------------	---

Conclusion

BNP Paribas has developed the BNP Paribas Social Bond Framework, under which it intends to issue social standard bonds and unsecured debt securities including bonds, certificates, notes, and public and private placements, and use the proceeds to finance assets that are expected to increase access to employment, socio-economic advancement and empowerment, affordable housing, education and healthcare services. Sustainalytics considers that the proceeds are expected to provide positive social impacts.

The BNP Paribas Social Bond Framework outlines a process for tracking, allocating and managing proceeds and makes commitments for the Bank to report on allocation and impact. Sustainalytics considers that the Framework is aligned with the overall sustainability strategy of the Bank and that the social use of proceeds categories are expected to contribute to the advancement of the UN Sustainable Development Goals 3, 4, 8, 10 and 11. Additionally, Sustainalytics is of the opinion that BNP Paribas has adequate measures to identify, manage and mitigate environmental and social risks associated with the eligible projects.

Based on the above, Sustainalytics is confident that BNP Paribas, BNP Paribas Emissions und Handelsgesellschaft mbH and BNP Paribas Issuance B.V. are well positioned to issue social secured bonds and unsecured debt securities, and that the BNP Paribas Social Bond Framework is robust, transparent and in alignment with the core components of the Social Bond Principles 2023.

Disclaimer

Copyright ©2025 Sustainalytics, a Morningstar company. All rights reserved.

The information, methodologies, data and opinions contained or reflected herein (the "Information") are proprietary to Sustainalytics and/or its third-party content providers and may be made available to third parties only in the form and format disclosed by Sustainalytics. The Information is not directed to, nor intended for distribution to or use by India-based clients and/or users, and the distribution of Information to India resident individuals and entities is not permitted.

The Information is provided for informational purposes only and (1) does not constitute an endorsement of any product, project, investment strategy or consideration of any particular environmental, social or governance related issues as part of any investment strategy; (2) does not constitute investment advice nor recommends any particular investment, nor represents an expert opinion or negative assurance letter; (3) is not part of any offering and does not constitute an offer or indication to buy or sell securities, to select a project nor enter into any kind of business transaction; (4) is not an assessment of the economic performance, financial obligations nor creditworthiness of any entity; (5) is not a substitute for professional advice; (6) has not been submitted to, nor received approval from, any relevant regulatory or governmental authority. Past performance is no guarantee of future results.

The Information is based on information made available by third parties, is subject to continuous change and no warranty is made as to its completeness, accuracy, currency, nor the fitness of the Information for a particular purpose. The Information is provided "as is" and reflects Sustainalytics' opinion solely at the date of its publication.

Neither Sustainalytics nor its third-party content providers accept any liability in connection with the use of the Information or for actions of third parties with respect to the Information, in any manner whatsoever, to the extent permitted by applicable law.

Any reference to third party content providers' names is solely to acknowledge their ownership of information, methodologies, data and opinions contained or reflected within the Information and does not constitute a sponsorship or endorsement of the Information by such third-party content provider. For more information regarding third-party content providers visit <http://www.sustainalytics.com/legal-disclaimers>

Sustainalytics may receive compensation for its ratings, opinions and other services, from, among others, issuers, insurers, guarantors and/or underwriters of debt securities, or investors, via different business units. Sustainalytics maintains measures designed to safeguard the objectivity and independence of its opinions. For more information visit [Governance Documents](#) or contact compliance@sustainalytics.com.

This deliverable, in particular the images, text and graphics contained therein, and the layout and company logo of Sustainalytics are protected under copyright and trademark law. Any use thereof shall require express prior written consent. Use shall be deemed to refer in particular to the copying or duplication of the opinion wholly or in part, the distribution of the opinion, either free of charge or against payment, or the exploitation of this opinion in any other conceivable manner.

The issuer is fully responsible for certifying and ensuring the compliance with its commitments, for their implementation and monitoring.

About Morningstar Sustainalytics

Morningstar Sustainalytics is a leading ESG research, ratings and data firm that supports investors around the world with the development and implementation of responsible investment strategies. For more than 30 years, the firm has been at the forefront of developing high-quality, innovative solutions to meet the evolving needs of global investors. Today, Sustainalytics works with hundreds of the world's leading asset managers and pension funds, which incorporate ESG and corporate governance information and assessments into their investment processes. Sustainalytics also works with hundreds of companies and their financial intermediaries to help them consider sustainability in policies, practices and capital projects. For more information, visit www.sustainalytics.com.

