# **ETHICS FUNDAMENTALS**

# Union de Banques Arabes et Françaises

July 2021



## Ethics fundamentals UBAF - july 2021

#### **PREFACE**

Beyond regulatory prescriptions, ethics is more and more becoming an inescapable necessity in the management of business flows that binds Union de Banques Arabes et Françaises (UBAF) to its customers and service providers.

UBAF entities apply a code of ethics with several objectives, namely:achieving Corporate Social Responsibility (CSR) goals, offering the best quality of service, preventing fraud and corruption.

All Directors and employees are made aware of our code of ethics. It is applied by each entity in a form that reflects its specific characteristics and incorporated into its internal control procedures.

Please find hereunder, a summary focusing on our ethics fundamentals.

#### STRIVING TOWARDS CSR OBJECTIVES

UBAF group has set economic, social and environmental actions. It includes a broad scope of measures, for instance: aligning remuneration policy to the best market practices (remuneration committee, equal pay gender policy<sup>1</sup>), promoting quality of life at work (health and safety, work-life balance), promoting employee participation and social dialogue, developing services and procedures that integrate social and environmental elements.

The responsible and sustainable nature of UBAF is inherent to its activities and organization. It appears in particular as follows:

- its specialization in the financing of the real economy,
- its activities focused on emerging countries,
- · its ethical finance activities,
- a prominent shareholder (Crédit Agricole CIB) at the forefront of CSR,
- its restricting policy regarding certain sensitive underlying transaction (e.g. fossil energy, nuclear power energy, armament, minerals from conflict area),
- other topics: a diversity valued in recruitment, the protection of the personal data, the energy label (low consumption building, HQE® certification), waste sorting, etc.

UBAF complies, inter alia, with the European Central Bank's 2020 guide on climate-related and environmental risks.

In any case, UBAF operates worldwide in compliance with human rights and basic social rights.



<sup>&</sup>lt;sup>1</sup> To consult our gender equality index, please click <u>here</u>.

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## **ENSURING THE BEST QUALITY OF SERVICE**

Any decision and any advice given on a product must take into account the interest of the client. UBAF entities must ensure:

- excellent quality of services (availability, responsiveness, cordiality, listening to customer needs, transparency and clear, precise, non-misleading information),
- adapted services (flexibility of services),
- secured services (application of international best practices and standards in the prevention of fraud, corruption and conflicts of interest, the sustainment of cyber security and data protection).

Any non-public information transmitted to UBAF by its counterparties is protected by professional secrecy. The data provided to UBAF for the purposes of an operation are kept confidential, whether or not the transaction succeeds.

Regarding personal data, UBAF complies, in particular, with the European General Data Protection Regulation (GDPR). You can consult our personal data protection policy by clicking here.

In case of dissatisfaction with our services quality, you can contact us at any time through the dedicated contact form by clicking here. We will revert to you within a few days.

#### FRAUD PREVENTION

Being a licensed bank registered in France under the monitoring of the French and European banking supervisors (ACPR, ECB), UBAF entities are subject to the highest standards. Controls are implemented vis-à-vis the clients and prospects (KYC), transactions, the suppliers (KYS) and sensitive positions held by some UBAF employees (KYE).

UBAF internal procedures and ethics against fraud put emphasis in particular on the following topics:

- money laundering and financing of terrorism,
- tax fraud.
- corruption and influence traffics<sup>2</sup>,
- conflicts of interest,
- gifts and benefits,
- other types of fraud (social engineering, false president's scam, cybercrime, etc.).

In addition to controls and employees trainings, the UBAF employees shall report without delay to their hierarchy and/or internal control functions any fraud attempt and any violation of an international commitment regularly ratified or approved by France<sup>3</sup>. According to regulation, the employee may also refer a fraud attempt directly to the public authorities (whistleblowing).

<sup>&</sup>lt;sup>3</sup> Notably United Nations Universal Declaration of Human Rights and European Convention on Human Rights.



<sup>&</sup>lt;sup>2</sup> To consult our anti-corruption system, please click <u>here.</u>