

Nicolas NAMIAS
Chairman of the Groupe BPCE Management Board

Groupe BPCE's individual commitments to act4nature international

Presentation of the Group

Groupe BPCE, is the second-largest banking group in France. It operates in the retail banking and insurance fields in France and pursues its activities worldwide with the asset & wealth management and the wholesale banking services.

Determined to act in favor of biodiversity, Groupe BPCE joins act4nature international and renews its commitment previously supported by its subsidiary Natixis.

In line with its Impact strategy, the Group is working to reduce the pressures on nature and gradually make this dimension an integral part of its activities.

Individual commitment

Individual commitment grid				
Link Common commitments	SMART commitment: description	Scope of activity	Measurable objective	Deadline
1 INTEGRATING THE STRATEGY				
1	1 Governance Make biodiversity issues an integral part of the Group's governance bodies (notably the Executive Management Committee and the Strategic Committee for Environmental Transition)	BPCE SA	• Biodiversity theme discussed at least 2 times a year in Group governance bodies from the date of publication	End 2026
1	2 Biodiversity strategy Formalize the strategy adopted by BPCE Assurances for its Nature & Biodiversity investments, detailing the areas of work ⁽⁹⁾ and the associated timetable; to be submitted to the ESG Committee and presented to the Board of Directors	BPCE ASSURANCES for investment activities	• Adoption of a biodiversity strategy	End 2025
1	3 Biodiversity strategy Formalize the strategy adopted by CEGC for its Nature & Biodiversity investments, detailing the areas of focus and the associated timetable ⁽⁹⁾ to be submitted to the CEGC Executive Committee and the Board of Directors	CEGC for non-life investment activities ⁽¹⁰⁾	• Adoption of a biodiversity strategy	End 2026
2 ASSESSING IMPACTS AND DEPENDENCIES ON NATURE				
3 4	4 Systematize and/or strengthen the consideration of pressures on biodiversity⁽¹¹⁾ by Natixis CIB's financing activities in high-stake sectors⁽¹²⁾ [scope of the GWF⁽¹³⁾] <i>For example, in the case of dedicated financing, account will be taken of the geospatial location of real assets financed in high-stake areas, as will the condition and richness of the ecosystems.</i> <i>The in-house Green Weighting Factor ("GWF") tool will be fed with a greater number and higher quality of biodiversity data. It should be remembered that the GWF's environmentally-adjusted climate rating is part of Natixis CIB's internal credit granting process</i>	Financing activities of Natixis Corporate & Investment Banking	• Publication of a methodological note explaining the approach adopted (criteria/biodiversity data added), its scope and its level of integration into credit-granting processes	End 2026
3	5 Evaluate the biodiversity footprint of the investments of Natixis Investment Managers' management companies headquartered in Europe on the perimeter to be covered by a biodiversity data provider ⁽¹⁴⁾	Natixis IM	• Measurement of biodiversity footprint	End 2025
3	6 Set up a system to measure and monitor issues relating to Nature and Biodiversity Identification of metrics to measure the impact and dependence of our portfolio on Nature & Biodiversity issues, and to identify the positive or negative contribution of our investments to these issues (via macro-analyses at portfolio level and the inclusion of biodiversity in the ESG analysis of new direct investments)	BPCE ASSURANCES for investment activities	• Publication of analysis results (via the Article 29 LEC report)	End 2026
3	7 Assessing impacts and dependencies at entity level Assess, using recognized methodologies, the impacts and dependencies on nature at the level of the banking entities, with a view to identifying levers for action	Banking activities of Groupe BPCE	• Provision of a summary deliverable for the Group's main banking entities (target 80% of BP-CE / and Natixis entities)	End 2026
3	8 Evaluate - Integrating biodiversity into the Group's ESG data strategy Integrate at least 1 biodiversity dataset into the Group's ESG data platform for use by the business lines	Groupe BPCE	• At least 1 biodiversity dataset available on the Group's ESG data platform	End 2025
3 REDUCING PRESSURE (INCLUDING COMBATING DEFORESTATION)				
5 4 10	9 Combating deforestation Develop a dedicated CSR policy to address deforestation linked to agricultural raw materials in bank financing activities	Banking activities of Groupe BPCE	• Adoption of a deforestation policy	End 2025
5 4 10	10 Combating deforestation Asset management boutiques Mirova and Ostrum AM are committed to actively supporting the fight against deforestation by defining relevant policies or exclusions	MIROVA and OSTRUM AM	• MIROVA and OSTRUM AM adopt policies to combat deforestation	End 2025
5 4	11 Combating deforestation Commitment to actively support the fight against deforestation by defining relevant policies (notably palm oil), to be submitted to the ESG Committee and presented to the Board of Directors: - Definition and issues relating to deforestation - Analysis of the portfolio and issues relating to the investment universe - Proposal of eligibility criteria on flows and a strategy on stock with 2030 target	BPCE ASSURANCES for investment activities	• Adoption of a policy to combat deforestation, starting with the question of palm oil	End 2026
5	12 Policy on pesticides Formalization of a policy on pesticides; to be submitted to the ESG Committee and presented to the Board of Directors: - Definition and issues relating to the pesticide sector - Analysis of the portfolio and issues relating to the investment universe - Proposal of eligibility criteria on flows and a strategy on stock with a 2030 target (in line with the <i>Global Biodiversity Framework</i>)	BPCE ASSURANCES for investment activities	• Adoption of a sectoral policy on pesticides	End 2025
5	13 Geographical exclusion for Natixis project financing Exclude financing of projects located in sites of high ecological value, which are sites classified as IUCN I to IV , RAMSAR wetlands, UNESCO World Heritage Sites , Alliance for Zero Extinction (AZE) and having a material impact ⁽¹⁵⁾ on these sites. Also excluded is financing for oil and gas projects in the Ecuadorian Amazon region ⁽¹⁶⁾	Project financing for Natixis Corporate & Investment Banking	• Zero projects financed by Natixis each year	End 2026
4 MOBILIZING FINANCIAL RESOURCES				
6	14 Mobilizing a share of investments in favor of Biodiversity Define the types of investment that can be considered as having a positive impact on Nature and Biodiversity, with the aim of sizing a funding envelope to be earmarked for this type of investment	CEGC for non-life investment activities	• Publication of the definition adopted within CEGC's Nature & Biodiversity strategy • Definition of the investment envelope allocated to the subject	End 2026
6	15 Mobilizing a share of investments in favor of Biodiversity Define the types of investment that can be considered as having a positive impact on Nature and Biodiversity, with the aim of sizing a funding envelope to be earmarked for this type of investment	BPCE ASSURANCES for investment activities	• Publication of the definition adopted within BPCE Assurances' Nature & Biodiversity strategy • Definition of the investment envelope allocated to the subject	End 2026
5 BUILDING CAPACITY				
1 8	16 Targeted training Include biodiversity issues in the training program for directors of Group companies ⁽¹⁷⁾	Groupe BPCE	• 100% of Group directors of more than one year seniority have received at least one biodiversity training course	End 2026
8	17 Building employee awareness Roll-out of an awareness-building module for all employees, tailored to their jobs	Banques, Caisses, BPCE SA, Natixis CIB et NIM	• Training module made available to all employees	End 2026
8	18 Awareness-building Build awareness among FSE employees ⁽¹⁸⁾ about the economic impact of biodiversity, and examples of possible initiatives to preserve it, particularly in financing and guarantee activities	Groupe BPCE's Financial Solutions & Expertise (FSE) business unit	• Annual number of events with possible formats: 3 communications on the in-house social network, 1 webinar specific to biodiversity in real estate and a dedicated CSR corner ⁽¹⁹⁾	End 2026
8	19 Training / Awareness-building 1. Build awareness of biodiversity issues among Natixis CIB and Asset & Wealth Management (AWM) employees (Climate School, Inspiration Talks, Biodiversity Fresco, etc.). 2. Train senior management in biodiversity issues 3. Build employee awareness of Natixis CIB and AWM commitments to biodiversity issues (posters, expert sharing sessions, news, videos, etc.)	Groupe BPCE's global business lines ⁽²⁰⁾	• 1. Minimum 30% of employees have attended a session on biodiversity issues ⁽²¹⁾ • 2. At least 1 dedicated senior management committee and 1 training session for Natixis board members • 3. Publication of a report on information campaigns, target audiences and media used	End 2026
8	20 Targeted training Train BP and CE Agri/Viti business managers in environmental issues (including biodiversity)	Groupe BPCE retail banking activities	• 100% of Agri/Viti sales representatives who joined us more than a year ago received training ⁽²²⁾	End 2026
8	21 Acculturate employees & Train those involved in investment management Roll-out of a training program integrating Nature & Biodiversity issues for all departments involved (Strategy, Offer, Compliance, Risks, etc.), with a particular focus on employees involved in investment management	BPCE ASSURANCES for investment activities	• Min 40% of investment and CSR managers have taken the <i>Certificat in ESG Investing</i> training module offered by CFA ⁽²³⁾	End 2026
8	22 Contribute to work carried out by the industry Active participation in improving the way financial players take account of Nature & Biodiversity issues, by contributing to industry-wide initiatives (Finance for Biodiversity, Institut de la finance durable (IFD), Association française des investisseurs institutionnels (AF2i))	BPCE ASSURANCES for investment activities	• Active participation in at least 1 working group and details of associated deliverable[s]	End 2026
8 2 7	23 Contribute to work carried out by the industry Active participation in biodiversity work through industry-wide initiatives (including UNEP-FI, EPE, FBF, IFD, etc.)	BPCE SA	• Active participation in at least 1 working group and details of associated deliverable[s]	End 2026
9	24 Partnership Support research projects, fieldwork projects or academic chairs committed to the preservation of biodiversity	Natixis	Support at least 1 project by the end of 2026 and publish the projects supported and the amounts funded	End 2026

1 Cf. [IPBES Global Assessment Report on Biodiversity and Ecosystem Services, 2019](#).
2 Cf. Climate Report https://groupebpce.com/content/download/33295/file/TCFD_RapportClimat2022_FR-03.pdf: climate at the heart of the Group's 2024 strategic plan.
3 Cf. [Groupe BPCE 2023 Annual Report, p.109](#). It is intended to supplement this initial assessment with a materiality study of the risks linked to environmental factors, and to feed into discussions on how to strengthen the management of environmental impacts and risks.
4 The regulation on imported deforestation in Europe does not currently apply to the financial sector.
5 Previous commitment made by Natixis, representing Groupe BPCE's global businesses with Asset & Wealth Management (AWM) grouping Natixis Wealth Management and Natixis Investment Managers) and Corporate & Investment Banking (Natixis CIB). These two activities, now grouped together under the "Global Financial Services" business unit, represent around one third of the Group ([Results 2023, p.44](#)).
6 This is the case, for example, with training initiatives and the adoption of CSR policies at group level.
7 Extension of the scope to BPCE SA, BPCE Assurances and the FSE business unit (Financial Solutions & Expertise - Including custody and advisory services, and specialized financing including Compagnie Européenne de Garanties et Cautions / CEGC).
8 Global Biodiversity Framework: <https://www.cbd.int/gbf/targets>.
9 The aim is to develop advanced methods for taking account of biodiversity in investment activities, in line with return/risk objectives and social, environmental and governance responsibility criteria. *Examples include*: identifying the materiality of themes (impacts/dependencies), identifying levers that can be put in place (e.g. eligibility criteria), defining monitoring metrics, etc.
10 Assets representing commitments to beneficiaries of guarantees.
11 High-stake sectors: as defined by the Natural Capital Finance Alliance (Global Canopy, UNEP FI, and UNEP-WCMC) [2023]. ENCORE: [Exploring Natural Capital Opportunities, Risks and Exposure](#), 2023, Cambridge, UK: the Natural Capital Finance Alliance and whose materiality matrix can be found [here](#)
12 Pressures on biodiversity: IPBES defines 5 major pressures: land use change, overexploitation of resources, climate change, pollution and invasive alien species. As each pressure may be more or less material depending on the sector, company and location, account will only be taken of the most material pressures through an metric relevant to the activity being assessed.
13 Green Weighting Factor ("GWF"): an in-house mechanism that links analytical capital allocation to the degree of sustainability of each financing operation, and aims to support the bank's climate transition. The GWF is an in-house climate-focused tool ([infographic](#)) focusing on climate change, adjusted by most material environmental externalities: biodiversity, water, pollution, waste. Scope: All Natixis CIB banking products (loans, guarantees, securities, documentary credits), irrespective of their maturity, in all geographical zones and all business sectors, with the exception of the financial and government sectors.
14 Results have not been made public but are available to the act4nature manager.
15 Material impact: In most cases, project financing will lead to the appointment of an independent consultant who will be able to determine whether or not the impact of the planned project is material. This determination will be made independently of any ESAP (Environmental and Social Action Plan).
16 Ecuadorian Amazon Region: area bounded by the Pacific/Amazon divide of the Santiago, Pastaza and Napo watersheds and the eastern part of the Republic of Ecuador.
17 Directors of the Group's banks and entities, and board members of the Caisses d'Épargne.
18 The FSE (Financial Solutions & Expertise) business unit centralizes Groupe BPCE's expertise in specialized financing (leasing, consumer credit, factoring, sureties and guarantees, real estate development financing), securities custody, international development consulting and real estate solutions. [Description of the FSE business unit on p.38 of the BPCE 2023 registration document](#).
19 CSR Corner: an acculturation format for all FSE business unit employees, with the support of a speaker specializing in the topic in question.
20 Natixis CIB + Asset & Wealth Management.
21 By the end of 2023: 14,000 employees.
22 I.e. approximately 450 to 500 people; an estimated margin of 5% will be applied to reach the target.
23 CFA® Chartered Financial Analyst.