



**THE BNP PARIBAS GROUP'S
CODE OF TAX CONDUCT**

Full compliance with tax duties is at the core of the BNP Paribas Group's commitments in terms of economic, social, civic, and environmental responsibility.

Hence tax compliance of the operations aimed to meet its needs, or those of its clients, is a major objective of the Group's governance.

The Group has a long-standing internal tax compliance policy which defines the principles and procedures applicable to all transactions in which it has an interest.

THE GROUP'S TAX PRINCIPLES

- The decisions made by the BNP Paribas Group are guided by the need **to meet the requirements of the real economy**, not by tax considerations.
- **Establishment choices result from the Group's will to best serve its clients.** Besides, BNP Paribas **refrains from setting up establishments in states or territories deemed non-cooperative** by France, the European Union or the OECD.
- In all the jurisdictions where it operates, **the Group ensures compliance with the tax rules** provided for in treaties, laws and regulations as well as with any related taxations.
- **The transfer pricing policy applicable to intra-group cross-border transactions excludes any tax optimisation:** in accordance with OECD recommendations, it asserts the arm's length principle by which transactions between the entities of a same group are concluded at market conditions.
- Throughout the world, **the Group is seeking to establish and maintain a relationship based on co-operation with tax administrations.** To this end, it pays close attention to compliance with transparency requirements with regard to tax authorities, notably to the duties related to transactions subject to a specific reporting to these authorities (disclosure rules resulting from either domestic laws or European directives).
- **The Group places great emphasis on its clients' tax compliance:**
 - The Group abstains from taking part, to its clients' benefit, in any operations likely to result in an undue tax advantage.
 - In private banking, the Group:
 - requires its non-resident clients to fill out a self-certification form stating they comply with their tax duties, which corroborates the other data gathered by the Bank's teams; should they fail to do so, the relationship is brought to an end;
 - does not, as a rule, engage with companies registered in states or territories deemed non-cooperative.
 - The Group ensures **the rightful application of the provisions ruling the withholding of taxes at source** as well as the transfer of these to the budgets of the concerned states or territories.
 - The Group also ensures the **quality and exhaustiveness of the information it provides**, automatically, or on request, or spontaneously, to public authorities.

The Group ensures that its tax principles remain aligned with both the requirements of the public authorities and social expectations.

Respect of these principles in the different activities of the Group is, with the support of the Tax Function, the subject of three-level internal controls : by the Business, by the Risk or the Compliance Function and by the Inspection Générale.

BNP Paribas provides tax authorities with all the information they need to check its good tax practices: forms, documentation relating to the transfer pricing policy, detailed country by country reporting.

The fiscally responsible behaviour of the Group is reflected in the fair contribution it makes to tax receipts throughout the world.

The Group displays full transparency by publishing, every year, a chart presenting, for each country, its revenues, headcount and income as well as the corporate income tax paid (*see section 8 of the Universal registration document*).

The fiscally responsible behaviour of the Group is reflected in the importance of its contribution to the tax receipts of the states or territories in which it operates.

TAX AND SOCIAL CONTRIBUTIONS BORNE BY BNP PARIBAS

Worldwide, the amount of taxes due by the Group in 2019 reached 5.9 billion euros.

In France, the Group paid 2.5 billion euros in taxes for the same fiscal year. The Group also settled 1.5 billion euros in employer's social security and other contributions, resulting in an amount of 4 billion euros in tax and social contributions.

Moreover, the Group graciously plays an essential role as tax collector on behalf of public authorities by withholding taxes relating to both the transactions carried out by its clients and the income paid to them.