

VAT GROUP AGREEMENT OF THE SINGLE TAXABLE PERSON
« CRÉDIT AGRICOLE VAT GROUP ASU »

Related parties:

In Crédit Agricole S.A, the following persons are party to this agreement:

<u>Interested party</u>	<u>Position in Crédit Agricole S.A.</u>	<u>Position in the contracting party</u>
<u>Board of Directors</u>		
Mr. Dominique LEFEBVRE	Chairman	Caisse régionale Val-De-France, Fédération Nationale du Crédit Agricole, SACAM Participations (Chairman)
Mr. Raphaël APPERT	Director	Caisse régionale Centre-Est (Chief Executive Officer), Fédération Nationale du Crédit Agricole (Vice-Chairman), SACAM Participations (Director)
Mr. Olivier AUFFRAY	Director	Caisse régionale d'Ile-et-Vilaine (Chairman), CREDIT AGRICOLE TECHNOLOGIES ET SERVICES (Supervisory Board member), CA-GIP (Director)
Mrs. Sonia BONNET-BERNARD	Director	Crédit Agricole CIB (Director)
MR. Hugues BRASSEUR	Director	Caisse régionale de l'Anjou et du Maine (Chief Executive Officer),
Mr. Pierre CAMBEFORT	Director	Caisse régionale Nord Midi Pyrénées (Chief Executive Officer), CREDIT AGRICOLE TECHNOLOGIES ET SERVICES (Supervisory Board member), CREDIT AGRICOLE PAYMENT SERVICES (Chairman)
Mr. Jean-Pierre GAILLARD	Director	Caisse régionale Sud Rhône Alpes, ADICAM (Chairman), LCL - LE CREDIT LYONNAIS (Director)
Mrs. Nicole GOURMELON	Director	Caisse régionale Atlantique Vendée (Chief Executive Officer), LCL - LE CREDIT LYONNAIS, (Director), CREDIT AGRICOLE TECHNOLOGIES ET SERVICES (Supervisory Board member),
Mr. Pascal LHEUREUX	Director	Caisse régionale Normandie Seine (Chairman)

Mrs. Carol SIROU	Director	Crédit Agricole CIB (Director)
Mr. Louis TERCINIER	Director	Caisse régionale Charente-Maritime Deux-Sèvres (Chairman)
Mr. Eric VIAL	Director	Caisse régionale des Savoies (Chairman) Fédération Nationale du Crédit Agricole (Member), SACAM Participations (Director)
<u>Executive function</u>		
Mr. Philippe BRASSAC	Chief Executive Officer	Crédit Agricole CIB, AMUNDI, LCL - LE CREDIT LYONNAIS (Chairman)
Mr. Xavier MUSCA	Deputy Chief Executive Officer responsible for Large customers	Crédit Agricole CIB (Chief Executive Officer)

Background:

By letter dated October, 18th 2022, Crédit Agricole S.A (hereinafter “CASA”) opted for the creation of a single taxable person for the purposes of value added tax pursuant to the provisions of Article 256 C of the French General Tax Code, starting from January 1st 2023.

CASA, Member of the single taxable person, has also agreed to be appointed representative of the single taxable person. This single taxable person is called the “Crédit Agricole VAT Group ASU”.

Each Member has previously agreed by letter to the constitution of the Crédit Agricole VAT Group and to the designation of CASA as Representative of the Crédit Agricole VAT Group. Each Member has also accepted that CASA exercises, as Representative, the option to form the Crédit Agricole VAT Group.

The purpose of the agreement is to regulate the operating procedures of the Crédit Agricole VAT Group. It also details the methods for calculating and operating the compensation paid to Members and to CASA in view of the creation of the Crédit Agricole VAT Group. This agreement details in particular the compensation arrangements for Members who would not have an individual financial interest in joining the Crédit Agricole VAT Group, but also lays down the principle of apportioning the annual residual net gain that could be found at the level of the single taxable person.

The agreement has not yet been signed by the parties.

Terms and conditions:

The agreement sets out how the equalization fund will operate, enabling Crédit Agricole SA, as the sole taxable person’s representative, to manage all flows relating to compensation and reallocation of profits. The equalization fund is a cash account.

The agreement provides that the residual annual net gain recognized in the VAT Group will be distributed between the entities of the Crédit Agricole SA division and those of the mutualist division according to a breakdown specific to the organization of the Crédit Agricole Group.

Each of the 296 member entities of the “ASU GTVA CREDIT AGRICOLE” VAT Group, the list of which is set out in the Annex, will sign an identical agreement with Crédit Agricole S.A. Of these 296 entities, it has already been noted that the Fédération Nationale du Crédit Agricole would approve and sign the agreements of the Regional Banks on their behalf.

Reasons justifying the interest of the agreement for the company:

The agreement is of primary interest to Crédit Agricole S.A. in that it obliges the members of the single taxable person for VAT purposes to recognize not only the existence of the equalization fund and its operation, but also the principle that the fund should be maintained, that compensation should be paid and that the residual net gain should be shared according to a specific methodology.

It also has the advantage of clarifying the reciprocal obligations of the representative of the single taxable person for VAT purposes and the members of the single taxable person.

Annexe : Contracting parties

Name	SIREN
CREDIT AGRICOLE S.A.	784608416
CREDIT AGRICOLE PAYMENT SERVICES	723001467
PROGICA S.A.S.	401440268
FONCARIS	350892022
LIXXBAIL	682039078
LIXXCOURTAGE SAS	397704917
UNIFERGIE	326367620
FINAMUR (EX UCABAIL IMMOBILIER)	340446707
AMUNDI	314222902
AMUNDI ASSET MANAGEMENT	437574452
AMUNDI FINANCE	421304601
AMUNDI ESR	433221074
AUXIFIP	602055345
PREDICA	334028123
PACIFICA	352358865
CA INDOSUEZ	572171635
AMUNDI IMMOBILIER	315429837
AMUNDI PRIVATE EQUITY FUNDS (EX CAAM CI)	422333575
IMMOFI CACIB (EX FINANCIERE IMMOBILIERE CA-CIB)	378650212
BFT INVESTMENT MANAGERS	334316965
CA INDOSUEZ GESTION	392945382
CPR ASSET MANAGEMENT	399392141
ESTER FINANCE TECHNOLOGIES	414886226
CREDIT AGRICOLE CIB FRANCE	304187701
LCL - LE CREDIT LYONNAIS	954509741
EDA	316136506
CREALFI (EX CA-MOZAÏC)	437604770
SOFINCO PARTICIPATIONS	326508074
SEDEF (SNC)	331320028
CA CONSUMER FINANCE (EX SOFINCO)	542097522
ARGENCE DEVELOPPEMENT	419270319
CR 802 NORD EST	394157085
NORD EST EXPANSION (EX-COFINEP)	383619046
NECI	429037815
CR 810 CHAMPAGNE - BOURGOGNE	775718216
CR 812 NMP	444953830
CR 813 ALPES PROVENCE	381976448
CR 817 CH.-MARIT. DEUX-SEV	399354810
CR 820 CORSE	782989206
CR 822 COTES D'ARMOR	777456179
CR 824 CHARENTE PERIGORD	775569726

CR 825 FRANCHE COMTE	384899399
CR 829 FINISTERE	778134601
CR TOULOUSE 31 (EX-CR 831TOULOUSEMIDI	776916207
CR 833 D'AQUITAINE	434651246
CR 836 ILLE & VILAINE	775590847
CR 839 SUD RHONE ALPES	402121958
CR 844 VAL DE FRANCE	400868188
CR 845 LOIRE/HAUTE-LOIRE	380386854
CR 847 ATLANTIQUE VENDEE	440242469
CR 848 CENTRE LOIRE	398824714
CR 860 MORBIHAN	777903816
CR 861 LORRAINE	775616162
CR 866 NORMANDIE	478834930
CR 867 NORD DE FRANCE	440676559
CR 868 CACF	445200488
BANQUE CHALUS	855201018
CR 869 PYRENEES-GASCOGNE	776983546
CR 871 SUD-MEDITERRANEE	776179335
CR 872 ALSACE VOSGES	437642531
CR 878 CENTRE EST	399973825
CALIXTE INVESTISSEMENT (EX: CE IMMOB HOLDING)	433948890
CR 879 ANJOU ET DU MAINE	414993998
CR 881 DES SAVOIE	302958491
CADS DEVELOPPEMENT	451782288
CR 882 PARIS ILE DE FRANCE	775665615
SOCADIF	354082299
CR 883 NORMANDIE SEINE	433786738
CR 891 PROVENCE-COTE D'AZU	415176072
CR 894 TOURAINE ET POITOU	399780097
CR 895 CENTRE-OUEST	391007457
CR 900 GUADELOUPE	314560772
CR 902 MARTINIQUE GUYANE	313976383
CR 903 REUNION	312617046
SACAM PARTICIPATIONS	421023482
SCI CAM	318070513
CAMCA	784338527
DIAPRE UN	344800974
IFCAM	306170184
DIFCAM	335324042
ADICAM	331500322
FNCA	310047147
AMUNDI INTERMEDIATION	352020200
UNIPIERRE ASSURANCE	382148302
SIRCA (SNC)	388156499
GECICA (GIE)	347956757

SEP CASTOSOF	441559606
SEP EDA-SOFINCO (SP)	443000369
SEP SEDEF (SOFINCO-SEDEF - SP)	397863952
LESICA (EX SIGMA 21)	444633283
PACIFICA HUGO	479999138
CARVEST	453051641
CA CREATION	419319322
CADS CAPITAL	326507167
CAI RISK SOLUTIONS ASSURANCE	422549956
SAINTE CROIX (SCI)	314636515
CREDIT AGRICOLE CIB TRANSACTIONS	380578609
VALBAUME IMMOBILIER	340702802
GECAM (GIE)	434564860
CACI (CA CREDITOR INSURANCE)	385254297
CA-SP	433373321
CAA - CREDIT AGRICOLE ASSURANCES (EX-SIGMA 23)	451746077
CREDIT AGRICOLE ASSURANCES SOLUTIONS	451751564
PREVISEO OBSEQUES (EX-FEDER 02)	409463866
SOCIETE CIVILE IMMOBILIERE FEDERALE PEREIRE VICTOIRE	400229944
SCI FEDERPIERRE CAPUCINES	410803217
SCI GRENIER VELLEFAUX	398113092
SCI VICQ D'AZIR-VELLEFAUX	351242177
SCI VICQ NEUILLY	408631059
CENTRE LOIRE EXPANSION	481807675
CREDIT AGRICOLE TECHNOLOGIES ET SERVICES	521320408
SOCIETE GENERALE GESTION (S2G) (EX VALINTER 13)	491910691
CR 835 LANGUEDOC (CRCAML)	492826417
SCI SEGUR	399077601
SCI 1 3 PLACE VALHUBERT	438840597
SCI PORTE DES LILAS FRERES FLAVIEN	493179485
SCI MEDIBUREAUX	444031470
IMEFA TROIS	347448896
IMEFA HUIT	348535121
IMEFA NEUF	348535063
IMEFA DIX	348535006
IMEFA DOUZE	349815779
IMEFA SEIZE	351294970
IMEFA DIX SEPT	351295175
IMEFA VINGT	351978457
IMEFA VINGT CINQ	351978622
IMEFA TRENTE SIX	393399910
IMEFA SOIXANTE TREIZE	402865711
IMEFA SOIXANTE SEIZE	402865182
IMEFA QUATRE VINGT UN	411929730
SCI IMEFA QUATRE VINGT DOUZE	415373448

IMEFA QUATRE VINGT QUATORZE	415373661
IMEFA CENT	421262247
IMEFA CENT UN	421262031
SCI IMEFA CENT QUATRE	421264284
SCI IMEFA CENT CINQ	421264771
IMEFA CENT NEUF	421264219
IMEFA CENT TREIZE	432489763
IMEFA CENT DIX SEPT	432513059
IMEFA CENT TRENTE NEUF	434771317
IMEFA CENT VINGT HUIT	434770723
IMEFA CENT VINGT SIX	434770525
IMEFA CENT VINGT ET UN	434770244
IMEFA CENT VINGT TROIS	434770392
IMEFA CENT VINGT NEUF	434770806
IMEFA CENT TRENTE ET UN	434771010
SCI CHAMBOURCY - PARC DES VERGERS	434771127
SCI 3-5 BIS BOULEVARD DIDEROT	434771150
IMEFA CENT QUARANTE	434771366
CR 887 BRIE PICARDIE	487625436
MOKA BAIL 1 (EX CTL 738)	501572408
MOKA BAIL 2 (EX CTL 739)	501573802
GULOU BAIL (EX CTL 743)	501626493
ZHONGLOU BAIL (EX CTL 744)	501571897
ZHU JIANG BAIL 1 (CTL 746)	501572291
ZHU JIANG BAIL 2 (EX CTL 748)	501572192
DUTCH WINDMILL BAIL (EX CTL 749)	501571848
AL ASIMIYA BAIL (EX CTL 750)	501550990
CATP EXPANSION	504704776
CARCIE	508438447
CARCENTRE	504331844
VAL DE FRANCE EXPANSION	508193422
CENTRE OUEST EXPANSION	508944311
BFORBANK (EX SEL - SPECIALISTE EPARGNE EN LIGNE)	509560272
GEFOCAM (GIE)	435200530
GIFORCAM	342544327
COOPERNIC GIE	451361208
CACI NON VIE	509690715
CACI VIE	509703468
CASRA CAPITAL	513568816
CAMCA COURTAGE (SA)	428681985
FIRECA PORTAGE DE PROJETS	522013358
SIGMA INVESTISSEMENT 39 (EX SIGMA 39)	522514322
SPIRICA (EX AXERIA VIE)	487739963
ISR COURTAGE	492823851
UAF LIFE PATRIMOINE	433912516

CREDIT AGRICOLE CAPITAL PME	539015529
EZGI AIRCRAFT LEASING 1 (EX CTL 1102)	538805946
EZGI AIRCRAFT LEASING 2 (EX CTL 1103)	538805912
CHANG JIANG BAIL 1 (EX CTL 1104)	538805904
EZGI AIRCRAFT LEASING 3 (EX CTL 1105)	538806035
CHANG JIANG BAIL 2 (EX CTL 1106)	538825753
SHAMIAN BAIL 1 (EX CTL 1109)	538825183
ATHBA BAIL (EX CTL 1112)	538825878
SHAMIAN BAIL 2 (EX CTL 1113)	538825902
SHAMIAN BAIL 3 (EX CTL 1114)	538826439
SHAMIAN BAIL 4 (EX CTL 1115)	538811068
SHAMIAN BAIL 5 (EX CTL 1201)	790085070
SHAMIAN BAIL 6 (EX CTL 1202)	790085096
YU YUAN BAIL 1 (EX CTL 1204)	790084438
YU YUAN BAIL 2 (EX CTL 1205)	790085005
GIFECAM	329024012
VDF INVESTISSEMENT	794689786
CA ASSURANCE REGION	798006623
SCI 11 PLACE DE L'EUROPE	528694953
CALIESF	442471116
ORYX-380-189 BAIL (EX CTL 1304)	799338405
ORYX-380-181 BAIL (EX CTL 1305)	799343553
SCI CAMPUS MEDICIS ST DENIS	801302183
SCI CAMPUS RIMBAUD ST DENIS	801303363
AMUNDI TRANSITION ENERGETIQUE	804751147
IMEFA CENT QUARANTE HUIT	804601300
ISSY PONT	804865996
ORCHID LEASING 1 (EX CTL 1402)	807946249
ORCHID LEASING 2 (EX CTL 1403)	807946587
FENICE BAIL 1 (EX CTL 1404)	807946561
PHAISALI BAIL (EX GULANGYU BAIL 5)	807946686
GULANGYU BAIL 1 (EX CTL 1407)	807946777
GULANGYU BAIL 2 (EX CTL 1408)	808008734
GULANGYU BAIL 3 (EX CTL 1409)	808008825
GULANGYU BAIL 4 (EX CTL 1410)	808008908
FENICE BAIL 2 (EX CTL 1411)	808008973
TEVFIK 1 (EX CTL 1413)	808009054
TEVFIK 2 (EX CTL 1414)	808009385
TEVFIK 3 (EX CTL 1415)	808039663
TEVFIK 4 (EX CTL 1416)	808039770
TEVFIK 5 (EX CTL 1417)	808039705
IMEFA CENT CINQUANTE CINQ	804517829
LYON TONY GARNIER	804490084
VILLEURBANNE LA SOIE ILOT H	804603736
GHD OPCO HOTEL	810468454

SAS 59 61 RUE LA FAYETTE	528440936
GHD COMRS.RCES	534628367
IMEFA CENT CINQUANTE HUIT	812503654
IMEFA CENT CINQUANTE NEUF	812503738
IMEFA CENT SOIXANTE ET UN	812619047
IMEFA CENT SOIXANTE TROIS	812619153
IMEFA CENT SOIXANTE CINQ	812619195
CA-CHEQUES	814357091
COBALT	815278361
ORYX-380-193 BAIL (EX CTL 1506)	815003223
DESPINA BAIL (EX CTL 1507)	815003330
RHODE BAIL (EX CTL 1508)	815003637
ANTARTIK BAIL (EX CTL 1509)	815003710
ORCHID LEASING 3 (EX CTL 1510)	815004676
RUSHMORE BAIL 1 (EX CTL 1511)	815004742
RUSHMORE BAIL 2 (EX CTL 1512)	815004817
TUERQI LEASING (EX CTL 1515)	815004999
DUPLESSIS BAIL (EX CTL 1516)	815005046
AYLA LEASING 1 (EX CTL 1517)	815005079
AYLA LEASING 2 (EX CTL 1518)	815005160
SEDNA BAIL (EX CTL 1519)	815005210
ENCELADE BAIL (EX CTL 1520)	815005269
HDP BUREAUX	815231923
HDP HOTEL	815231972
HDP LA HALLE BOCA	815232087
IMEFA CENT SOIXANTE NEUF	815232129
IMEFA CENT SOIXANTE DIX	815232210
IMEFA CENT SOIXANTE DOUZE	818274623
IMEFA CENT SOIXANTE QUATORZE	818274714
IMEFA CENT SOIXANTE QUINZE	818381055
IMEFA CENT SOIXANTE DIX SEPT	818551392
IMEFA CENT SOIXANTE DIX HUIT	818401804
IMEFA CENT SOIXANTE DIX NEUF	818403586
VAL DE FRANCE INNOVATION	823361068
VILLAGE BY CA ATLANTIQUE VENDEE	824515076
TAI SHAN BAIL (EX CTL 1601)	824387666
SONG SHAN BAIL (EX CTL 1602)	824387765
HUA SHAN BAIL (EX CTL 1603)	824388011
ACAI BAIL 1 (EX CTL 1604)	824388136
DUBRIS LEASING 1 (EX CTL 1605)	824388243
DUBRIS LEASING 2 (EX CTL 1606)	824388425
AYLA LEASING 3 (EX CTL 1607)	824388490
LINEA UNO BAIL (EX CTL 1609)	824388615
JOLIETTE BAIL (EX CTL 1608)	824388581
ACAI BAIL 2 (EX CTL 1610)	824388698

IMEFA CENT QUATRE VINGT DEUX	825283963
IMEFA CENT QUATRE VINGT QUATRE	825284110
IMEFA CENT QUATRE VINGT SIX	825377450
IMEFA CENT QUATRE VINGT NEUF	825377500
IMEFA CENT QUATRE VINGT DIX	825379860
ORYX 7772F-MSN 66338 BAIL (EX CTL 1801)	839024007
ORYX 7772F-MSN 66339 BAIL (EX CTL 1802)	839023702
CTL 1804	839023645
FREYCINET BAIL (EX SURCOUF)	839023587
CA-GIP	840434740
CA I-CASH	840126866
CAMELIA LEASING 1	843901273
CHOPIN LEASING 26 (EX CTL 1813)	844575589
CHOPIN LEASING 27 (EX CTL 1814)	844575654
MERIDOR BAIL (EX CTL 1815)	844575779
CONVALLARIA GREEN LEASE (EX CTL 1816)	844575829
VAN GOGH BAIL (EX CTL 1817)	844575944
BEL ZOZIO 482 (EX YANXU LEASING 2)	844037945
CA LHL CAPITAL EXPANSION	852785807
COMITE MEDICIS	848128880
CASIHA	827968744
IMEFA CENT QUATRE VINGT DOUZE	852274430
SCI IMEFA CENT QUATRE VINGT TREIZE	852295799
IMEFA CENT QUATRE VINGT QUATORZE	852297605
SCI IMEFA CENT QUATRE VINGT DIX HUIT	852275189
SCI IMEFA CENT QUATRE VINGT DIX NEUF	852275270
NSP	884959883
CREDIT AGRICOLE CAPITAL PME 2	897453908
CREDIT AGRICOLE ASSURANCES RETRAITE	905383667
WASSAI 2014 (SNC)	805299195