

February 16, 2026

VIA ELECTRONIC AND FIRST CLASS MAIL

United Nations Global Compact
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Re.: BNP Paribas S.A.'s Breach of Global Compact Integrity Measures Policy¹

His Excellency, Mr. António Guterres, Secretary General of the United Nations,

We respectfully submit this petition to you, in your capacity as Chair of the Global Compact Board, to alert you to serious allegations, established in Court, of human rights violations involving a participant in The Global Compact ("the Compact"), BNP Paribas, S.A. ("BNPP" or "the Bank"). The Global Compact's Integrity Measures Policy requires action when a participant's conduct constitutes systematic or egregious abuses of the Compact's overall aims and principles and threatens the integrity, reputation, and good efforts of the Compact.² The Integrity Measures Policy further permits the Compact to delist a participant when abuse of the Ten Principles by the participant is admitted by an authorized company representative or is established by a court.³ BNPP's conduct in violation of fundamental human rights, and its

¹ Select attachments provided. Further documentation available upon request.

² United Nations Global Compact, INTEGRITY MEASURES POLICY at 4 (updated Dec. 2025), https://communications-assets.unglobalcompact.org/docs/publications/Integrity%20Measures%20Policy_2025.pdf.

³ *Id.*; United Nations Global Compact, DELISTING AND REJOINING POLICY at 3 (updated Aug. 2025), https://www.globalcompact.de/fileadmin/user_upload/Delisting_and_Rejoining_Policy_2025.docx.pdf.

alleged justifications for this conduct, as detailed in this petition, meet these requirements. We thus respectfully request that the Compact initiate Integrity Measures proceedings with BNPP, and that you consider what further steps are necessary to resolve the matter, including referring this matter to the full Global Compact Board to delist BNPP from membership in the Compact.

BNPP joined the Compact in 2003 and remains a member to this day.⁴ In committing to the Compact, the Bank agreed to Principles 1 and 2: “to support and respect the protection of internationally proclaimed human rights” and make sure that it “is not complicit in human rights abuses,”⁵ either “directly or indirectly.”⁶ However, while BNPP was making these commitments, the Bank simultaneously facilitated billions of U.S. dollars in transactions to the Government of Sudan and its leader, President Omar al-Bashir, even as he proclaimed that he intended to use the money to “increase the tempo and lethality” of violence against civilians.⁷ For more than a

⁴ BNP Paribas, *BNP Paribas Group supports the Global Compact* (June 17, 2003), <https://group.bnpparibas/en/press-release/bnp-paribas-group-supports-global-compact-1>; United Nations Global Compact, COMPANY INFORMATION, *BNP PARIBAS*, <https://unglobalcompact.org/what-is-gc/participants/1375> (last visited Feb. 12, 2026). BNPP continues to tout its membership in the Global Compact in its sustainability reporting materials, with membership granting companies access to being listed on sustainability indices. *See, e.g.*, BNP Paribas, PRINCIPLES FOR RESPONSIBLE BANKING: BNP PARIBAS 2025 REPORTING at 3, https://cdn-group.bnpparibas.com/uploads/file/bnpparibas_2025_prb_reporting.pdf (last visited Feb. 12, 2026).

⁵ United Nations Global Compact, THE POWER OF PRINCIPLES, *The Ten Principles of the UN Global Compact*, <https://unglobalcompact.org/what-is-gc/mission/principles> (last visited Feb. 12, 2026).

⁶ United Nations Global Compact, THE TEN PRINCIPLES OF THE UN GLOBAL COMPACT, *Principle Two: Human Rights*, <https://unglobalcompact.org/what-is-gc/mission/principles/principle-2> (last visited Feb. 12, 2026); *see also*, Statement of BNP Paribas on Human Rights, BUS. AND HUM. RTS. CTR. (Jan. 1, 2012), <https://www.business-humanrights.org/en/latest-news/pdf-statement-of-bnp-paribas-on-human-rights/>.

⁷ Sudan Peace Act, Pub. L. 107–245 (2002); Human Rights Watch, *Sudan, Oil, and Human Rights* at 37 (2003), <https://www.hrw.org/reports/2003/sudan1103/sudanprint.pdf>.

decade, BNPP provided this support to the al-Bashir regime, including in U.S. dollars, even though the United States had imposed sanctions prohibiting the use of its currency for Sudanese transactions because of the country's abhorrent record on human rights, including sexual violence against women and girls.⁸ Soon after BNPP's accession to the Global Compact, the United Nations also took action against Sudan, passing Security Council Resolutions 1556 and 1591 imposing a global embargo on Sudan, specifically the Darfur region, in response to the Government of Sudan's campaign of human rights violations and efforts to displace the region's Indigenous Black African population from their homes.⁹ The violations of human rights in Sudan, including allegations of genocide and ethnic cleansing in Darfur, were well publicized throughout the world.¹⁰

And yet, despite the known human rights catastrophe in Sudan, BNPP continued to funnel enormous sums of money to the al-Bashir regime, without appropriate restriction or oversight. As part of its 2014 guilty plea to the United States authorities for violating sanctions, the Bank, through its authorized company representatives, admitted to providing illegal support to the Sudanese Government that lasted until at least 2007 and provided the regime a minimum

⁸ Exec. Order No. 13067, 62 C.F.R. 59989 (Nov. 3, 1997), reprinted in 31 C.F.R. 538 (62 Fed. Reg. 59989, Nov. 5, 1997); Exec. Order No. 13400, 71 Fed. Reg. 25483 (Apr. 26, 2006).

⁹ S.C. Res. 1556, ¶¶ 7-9 (July 30, 2004); S.C. Res. 1591, ¶¶ 3-7 (Mar. 29, 2005).

¹⁰ See, e.g., Scott Anderson, *How Did Darfur Happen?*, NY Times (Oct. 17, 2004), <https://www.nytimes.com/2004/10/17/magazine/how-did-darfur-happen.html> (noting that Darfur "became a topic of urgent discussion in Congress and the United Nations, a staple of the evening news, even a debating point in the American presidential race.").

of \$6,000,000,000.¹¹ BNPP’s illicit business with Sudan was known at the highest levels of the Bank, and concealed from regulatory authorities. Indeed, despite an awareness of the causal link between the Bank’s provision of financial services and the human rights atrocities in Sudan, at a 2005 meeting of high-level Paris executives, the then-COO dismissed concerns of compliance officials and requested that the meeting proceed with no minutes taken.¹²

Today, however, BNPP asserts that *the same conduct for which they admitted criminal guilt* somehow did not contribute to the pain and suffering inflicted on the citizens of its client, the Government of Sudan, because, in its words, the Bank was engaged in nothing more than “ordinary banking services.”¹³ BNPP has asserted that it cannot be held civilly liable as an accomplice to the atrocities because its conduct merely supported the Government of Sudan’s legitimate sovereign acts.¹⁴ However, it is a widely accepted norm of international law that such atrocities can never be deemed legitimate sovereign acts.¹⁵ BNPP has also argued that it is immune from civil liability as an accomplice to the regime’s human rights abuses because the

¹¹ Stipulated Statement of Facts, *United States v. BNP Paribas, S.A.*, No. 1:14-cr-00460 (S.D.N.Y. June 30, 2014), ¶ 17 (Attachment A).

¹² *Id.* at ¶ 33.

¹³ Trial Tr. at 40:3-4, 1183:23-24, *Kashef v. BNP Paribas, S.A.*, No. 1:16-cv-03228; Press Release, BNP Paribas, *Further information regarding Sudan litigation* (Oct. 20, 2025), <https://group.bnpparibas/en/press-release/further-information-regarding-sudan-litigation>.

¹⁴ Def.’s Mem. of Law in Support of Renewed Mot. for J. as a Matter of Law or, Alternatively, Mot. for a New Trial or to Am. the J., ECF No. 1041, *Kashef v. BNP Paribas S.A.*, 1:16-cv-03228 at 20 (Nov. 14, 2025).

¹⁵ *Prosecutor v. Furundzija*, Case No. IT-95-17/1-T, Judgment, ¶ 155 (Dec. 10, 1998) (holding that once a prohibition has reached the status of a Jus Cogens norm that such status “serves to internationally delegitimise any legislative, administrative or judicial act authorising” the prohibited act.); *see also*, *Kashef v. BNP Paribas S.A.*, 925 F.3d 53, 61 (2d Cir. 2019).

Swiss sanctions program permitted some commercial transactions with Sudan not involving the sale of arms.¹⁶ Because the Bank supported al-Bashir principally through its Swiss subsidiary, BNPP claims that, under its interpretation of Swiss law, it was free to act without concern for the consequences of its actions for the Sudanese people, provided that its services stayed within the confines of the Swiss sanctions. The Bank has made these assertions even though genocide and complicity in genocide and other human rights abuses, such as rape, murder, and ethnic cleansing, are unquestionably illegal in Switzerland notwithstanding the design of the Swiss sanctions program.¹⁷

While BNPP has claimed that, in illegally facilitating unrestricted Sudanese transactions, it didn't believe it was "contributing in any way, shape, or fashion" to the Government of Sudan's campaign of human rights violations,¹⁸ documentary evidence from the Bank itself, however, establishes that the Bank knew that *any* assistance to Sudan would likely contribute to its military expansion and the ongoing atrocities.¹⁹ BNPP was aware at the time that it provided its services to Sudan that the al-Bashir regime was carrying out a genocide.²⁰ Indeed, one of the

¹⁶ Def.'s Mem. of Law in Support of Renewed Mot. for J. as a Matter of Law or, Alternatively, Mot. for a New Trial or to Am. the J., ECF No. 1041, *Kashef v. BNP Paribas S.A.*, 1:16-cv-03228 at 4 (Nov. 14, 2025).

¹⁷ Criminal Code of Switzerland, Arts. 25, 264, 264a, 264c-h.

¹⁸ Trial Tr. at 40:19-20, *Kashef v. BNP Paribas, S.A.*, No. 1:16-cv-03228; *see also* BNP Paribas, *Statement from BNP Paribas – Sudan Litigation* (Oct. 28, 2025), <https://invest.bnpparibas/en/document/statement-from-bnp-paribas-sudan-litigation> (asserting that BNP's banking activities "did not involve military equipment.").

¹⁹ Plaintiffs' Trial Exhibit 980 (the Bank acknowledging internally that in Sudan, the line between civil and military expenditures was "blurred.") (Excerpted as Attachment B).

²⁰ Court Approved Deposition Clip, D'Estais Dep., 62:22-25, *Kashef v. BNP Paribas, S.A.*, No. 1:16-cv-03228 (admitting knowledge of the Darfur genocide during the relevant period); Trial Tr. at 1184:5-9 (high level bank executive accepting that he knew at the time the Bank was "providing financial services of the

Bank's own employees testified that there was "a lack of true distinction" between military and civilian transactions in Sudan.²¹

In defiance of those warnings, however, the Bank facilitated transactions for Sudan's Ministry of Defense, entities in Sudan's military industrial complex, and the corporation that managed Sudan's airfields, which the Government used to fly bombing raids on civilian targets.²² In its own words, BNPP continued "feeding the Sudanese government" with money, providing, in effect, a blank check to known perpetrators of human rights atrocities.²³ As the Bank itself recognized, its compliance measures were "too often purely formal or not really done."²⁴

On October 17, 2025, a jury in the United States District Court for the Southern District of New York determined that BNPP is liable as an accomplice to the Government of Sudan for

Government of Sudan" that it "was engaged in a genocide in Darfur"); *see also* Stipulated Statement of Facts, *United States v. BNP Paribas, S.A.*, No. 1:14-cr-00460 (S.D.N.Y. June 30, 2014) (the Bank admitting that it willfully circumvented the U.S. embargo on Sudan despite the human rights situation in Sudan that was condemned by the international community) (Attachment A).

²¹ Court Approved Deposition Clip, Cozine Dep., 243:23-244:2, *Kashef v. BNP Paribas, S.A.*, No. 1:16-cv-03228.

²² Plaintiffs' Trial Exhibit 207 (showing Bank facilitated transactions involving GIAD, an automobile manufacturer that produced vehicles for Sudan's military); Plaintiffs' Trial Exhibit 60 (showing Bank facilitated transactions involving the Sudanese Ministry of Defense and Civil Aviation Authority); Plaintiffs' Trial Exhibit 174 (showing renewed credit line for Sudanese Civil Aviation Authority "responsible for construction and maintenance of the country's airport infrastructure."); Plaintiffs' Trial Exhibit 389 (noting that military Hind attack helicopters used to attack civilians were present at the airports of Darfur during the genocide.); Trial Tr. at 409:16-18, 416:18, *Kashef v. BNP Paribas, S.A.*, No. 1:16-cv-03228 (describing the dual military and civilian use of Sudan's airports).

²³ Plaintiffs' Trial Exhibit 215 (Attachment C).

²⁴ ECF No. 536, Ex. 71, BNPP-KASHEF-00000177, *Kashef v. BNP Paribas, S.A.*, No. 1:16-cv-03228.

its campaign of human rights violations as to three Sudanese refugee plaintiffs among a class of more than 20,000.²⁵ The Court presiding over this matter entered final judgment on January 7, 2026, finding that the evidence presented in favor of liability overwhelmed BNPP's purported justifications for its illegal conduct.²⁶

Since the Nuremberg trials, providing assistance to a perpetrator of human rights violations has been recognized as criminal and an independent breach of fundamental human rights. BNPP's conscious assistance to a known violator of human rights—the Government of Sudan—was admitted by the Bank as part of its U.S. sanctions guilty plea and has now been established by a United States federal jury and a federal judge as the basis for BNPP's liability. And still, BNPP continues to claim that its conduct amounted to normal banking operations.²⁷ BNPP's complicity in human rights violations and its assertions that the same conduct today would amount to regular business practices, immunized by their interpretation of Swiss law, defy the very purpose of the Global Compact and the Ten Principles. These justifications, while the Bank remains a participant in the Compact, are detrimental to the reputation and integrity of the Compact itself.²⁸

²⁵ See e.g., Jan Wolfe, *US jury finds BNP Paribas enabled Sudanese atrocities*, Reuters (Oct. 17, 2025), <https://www.reuters.com/legal/government/us-jury-finds-bnp-paribas-enabled-sudanese-atrocities-2025-10-17/>.

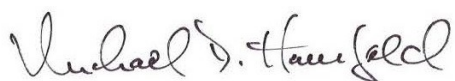
²⁶ Status Conference Hearing Tr. at 32:17-37:15, 51:6-53:24 (Jan. 7, 2026), *Kashef v. BNP Paribas, S.A.*, No. 1:16-cv-03228 (stating the Court's reasoning for denying the Bank's motion to overturn the jury's verdict) (Excerpted as Attachment D).

²⁷ Press Release, BNP Paribas, *Further Information Regarding Sudan Litigation* (Oct. 20, 2025), <https://invest.bnpparibas/en/document/pr-3> (describing BNPP's business in Sudan as "normal").

²⁸ Further, we note that BNPP's conduct in support of human rights violating regimes forms part of a pattern of practice by the Bank, which admitted to providing financial services to Cuba and Iran in contravention of U.S. laws intended to combat terrorism and safeguard human rights. Stipulated Statement of Facts,

Accordingly, we, the undersigned, respectfully request that you direct BNPP to account for this misconduct. Depending on the adequacy and sufficiency of the Bank's response justifying its flagrant disregard of its professional responsibilities and respect for fundamental human rights, we further request this matter be referred to the full Global Compact Board to consider delisting BNPP as a member of the Compact.

Respectfully submitted,



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United States v. BNP Paribas, S.A., No. 1:14-cr-00460 (S.D.N.Y. June 30, 2014) (Attachment A); *see also Moses v. BNP Paribas, S.A.*, 24-CV-4938, 2025 WL 2780803 (S.D.N.Y. Sept. 30, 2025) (permitting claims against BNPP for aiding and abetting the terrorist activity of the Iranian regime to proceed) (Attachment E).

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