



Covéa ethics charter

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Editorial

The principle of responsibility is at the heart of our model and the strategy of Covéa, a leading economic and mutual Group. This responsibility is first and foremost to ensure the sustainability and solidity of our Group, for the benefit of our customers, members and employees.

Ethics is a duty for all. It guides our individual behaviour and informs corporate decisions in strategy and business conduct.

In addition to the legislative and regulatory obligations that govern our business, we conduct our business in a way that promotes business ethics and compliance with social, societal and environmental responsibility requirements.

In a rapidly changing world, Covéa is building protection for its policyholders and seeking to preserve its assets, by demonstrating innovation and adaptability to societal challenges, in a spirit of simplicity, high standards, empathy and action.

Each Covéa employee is therefore invited to read this charter. It sets out a reference framework, the rules of good conduct shared by all Covéa employees. It is a common benchmark so that each and every one of us can serenely commit to and embody our values.

Thierry DEREZ
Chief Executive Officer

Our values

A strong and dynamic mutual insurance Group, Covéa is a major player in the insurance and reinsurance sector.

With its MAAF, MMA and GMF brands, the Group provides attentive, efficient and local support to one in three French households.

For more than twenty years, we have made a strong and profound choice: mutual commitment and an organisation that is as close as possible to our stakeholders: the 11.5 million customers and members who place their trust in us; the 21,000 employees in France who help to grow our Group; and the partners and stakeholders in society with whom we cooperate.

In 2022, Covéa acquired PartnerRe, the tenth largest reinsurer worldwide. From insurance for individuals, professionals and companies to reinsurance, the Group covers the entire risk chain.

HUMAN COMMITMENT

Available and attentive, our teams work every day for our customers and members, in good times and in difficult ones.

And thanks to our mutualist governance, each member has the opportunity to become involved in the governing bodies of their insurer.

PROXIMITY

With nearly 2,500 sales outlets throughout France, we have made proximity a reality. In our branches, online or on the phone, thanks to our call centres based exclusively in France, every effort is made to be as close as possible to our members. The Group is therefore active in the different labour market areas of its main sites.

SOLIDARITY

The essence of our mission is to show solidarity with our policyholders, our employees and society at large.

Our brands are multiplying initiatives, particularly in favour of better support for the disabled and through their foundations.

To broaden its sponsorship initiatives and increase its societal impact, Covéa created its Corporate Foundation in 2022, with the aim of promoting social and human inclusion.

RESPONSIBILITY

Every day, our members renew their trust in us to protect their families and property. To fully assume this responsibility, we adopt a long-term vision and actions. The fact that there are no shareholders, which is specific to mutual organisations, favours this approach. Combined with our financial solvency, it offers additional security to our policyholders, employees and partners.

As a player in the prevention of all risks, we act on a daily basis, with each of our brands, to raise awareness and inform our audiences, particularly in the areas of road safety and health.

Covéa is also committed to equal opportunities, against exclusion and any form of discrimination, by supporting people with disabilities and promoting professional integration.

THE SEARCH FOR PROGRESS

In a society that is evolving ever faster and adopting new uses, the contours of our business are being redrawn. In its constant quest for progress, Covéa is mobilising its energies and resources to develop innovative tools, particularly for managing and preventing climate risks.

We also support many research projects by funding chairs and institutes.

Based on these values, this charter sets out the framework defined by the Group and its employees to serve policyholders.

Our ethical commitment

WHY A CHARTER?

The ethics charter formalises the rules of conduct that apply to all Group employees and must guide them in their daily work.

It is a common benchmark so that each and every one of us can serenely commit to and embody our values. Lastly, it is intended to help employees question what they can and cannot do.

We remind you that belonging to the Group implies compliance with the laws and regulations in force.

The rules and commitments contained in this charter define a common standard of ethical requirements. They may be supplemented by the adoption of provisions at the level of each of the Group's entities or departments (specific procedures, quality commitments, etc.).

This charter in no way replaces the specific laws and regulations applicable to our activities. Some of the principles developed in this charter are also based on regulations. This ethics charter is not intended to be treated as internal regulations. The Group expects employees, and managers in particular, to behave reasonably and appropriately in the general conduct of their duties and business.

WHO IS COVERED BY THE CHARTER?

This charter defines the fundamental rules and values applicable to Covéa Group employees (temporary or permanent) and corporate officers (directors, executives).

The Group's executives and management ensure that the guiding principles set out in this charter are properly understood. All employees fall within this framework, regardless of their level of responsibility.

Our external stakeholders (members, customers, suppliers, agents, partners, etc.) are invited to adhere to the principles set out.

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SOCIAL, SOCIETAL AND ENVIRONMENTAL RESPONSIBILITY

1. PROMOTING INCLUSION AND DIVERSITY

Inclusion and diversity are values that are an integral part of Corporate Social Responsibility. Promoting diversity and taking an inclusive approach means giving everyone a place, regardless of their uniqueness, differences or opinions. It also means considering this diversity as a creator of cohesion, wealth and well-being that boosts the company's performance.

Illustrations

- Promoting diversity and inclusion as a means of raising awareness;
- Equal opportunities and equal treatment in access to employment, recruitment, career paths and in the day-to-day working environment; professional gender equality and gender diversity in the workplace;
- Employment and keeping disabled people in the workforce.

Covéa's commitments

Covéa's ambition is to create a strong, inclusive and concrete societal impact to support everyone towards a world of sustainable growth. Our commitments include the following:

- negotiating and signing collective bargaining agreements. A disabilities agreement and a professional gender equality agreement provide for concrete actions with ambitious objectives aimed at equal opportunities and equal treatment throughout the career paths;
- the implementation of training or communication actions as a means of raising awareness and supporting behavioural change and thus strengthening an inclusive corporate culture that creates internal cohesion;
- the actions of the Covéa Corporate Foundation, which revolve around three pillars: women's rights, inclusion, and information and knowledge in favour of inclusion.

Appropriate behaviours

- Promoting caring attitudes towards all in daily professional behaviour;
- Promoting the integration of everyone into the working environment without distinction;
- Being aware of legal discrimination criteria¹;
- Ensuring inclusiveness on a daily basis and in all team events (meetings, seminars, etc.).

Behaviours to be avoided/prohibited

- Avoiding any behaviour and decision that would hinder the inclusion of a person and cause them to be excluded, a degraded working atmosphere, an impact on individual and collective results;
- Repeatedly mocking or making jokes, including sexist jokes, about a colleague.

Case studies

As a manager, how can I contribute to building a more inclusive company?

You are a major player in upholding the values of inclusion and diversity:

- You must be exemplary and exclude any form of disrespectful words or actions;
- You must look out for possible signals within your team;
- You must relay internal communications and encourage employees to complete the e-learning on diversity.

As an employee, how can I contribute to building a more inclusive company?

Everyone has a role to play by:

- embodying values of openness and tolerance;
- expressing discomfort or intolerance of certain inappropriate attitudes or comments;
- taking an interest in the singularities, opinions and ideas of everyone;
- sharing the idea that diversity is a source of wealth within a team.

Contact persons

- Manager;
- Human Resources Manager (HRM);
- Internal whistleblowing system (see dedicated section in the charter).

1. See the "Combating all forms of discrimination" sheet.



SOCIAL, SOCIETAL AND ENVIRONMENTAL RESPONSIBILITY

2. COMBATING ALL FORMS OF DISCRIMINATION

Discrimination is unequal treatment based on a criterion prohibited by law, such as origin, gender, disability, etc., in an area covered by law, such as employment, housing or education.

Discrimination may be:

- direct, where one person is treated less favourably than another is, has been, or will be treated in a comparable situation;
- indirect, where a provision, criterion or practice is seemingly neutral, but may place persons at a particular disadvantage compared to others.

Illustrations

The law² defines 25 criteria for discrimination, including gender, surname, origin, pregnancy, marital status, physical appearance, place of residence, state of health, disability, genetic characteristics, morals, sexual orientation, gender identity, age, political opinions, trade union activities, actual or assumed membership or non-membership of an ethnic group, actual or assumed membership or non-membership of an alleged race, actual or assumed membership or non-membership of a nation, religious beliefs, loss of autonomy, the particular vulnerability of the person, resulting from their apparent or known economic situation, ability to express themselves in a language other than French, bank domiciliation.

Covéa's commitments

Covéa is committed to maintaining an inclusive environment and protecting its employees so that everyone finds their place and is respected.

The Group is therefore committed to implementing awareness-raising measures to prevent the consequences and risks of discrimination and to applying appropriate sanctions when discrimination is proven.

2. Article 225-1 of the French Criminal Code.

Appropriate behaviours

- Knowing, understanding and complying with the laws in force (25 discrimination criteria³ and criminal sanction⁴) as well as Covéa's commitments by completing the "Diversity to make a difference" e-learning course, open to all employees;
- Following the specific training dedicated to non-discrimination, depending on the functions held (new managers, recruiters, communication managers);
- Offering support to alleged victims of discrimination in order to direct them to the right people.

Behaviours to be avoided/prohibited

- Making or tolerating remarks or acting in a discriminatory manner, whatever the situation or context (hiring, promotion, training, team life, etc.);
- Fostering a non-respectful working environment that tolerates any form of discrimination, whether by actions or words, and whoever the other person is (colleagues, customers, partners, candidates, suppliers, etc.).

Case studies

I am shocked to hear that an employee regularly makes homophobic comments in a humorous way. What should I do?

- Tell them about your discomfort with these comments and mention the discriminatory and punishable nature of their remarks;
- Suggest that they follow the "Diversity to make a difference" training course;
- Contact, at your discretion, your manager, your HRM, or the "sexual harassment and sexist behaviour" contact person.

An employee with a physical disability tells me that their workstation is unsuitable. What are the resources available to apply for an adjustment?

This employee may contact several people: their manager, their HRM or may directly contact the Disability Unit, who will be able to take the appropriate measures in conjunction with the occupational physician.

Contact persons

- Manager;
- Human Resources Manager (HRM);
- "Sexual harassment and sexist behaviour" contact person for the company or the Social and Economic Committee (CSEE);
- Internal whistleblowing system (see dedicated section in the charter).

3. See "Illustrations" section.

4. Article 225-2 et seq. of the French Criminal Code.



SOCIAL, SOCIETAL AND ENVIRONMENTAL RESPONSIBILITY

3. TACKLING ALL FORMS OF SEXIST BEHAVIOUR AND HARASSMENT

Sexist behaviour is manifested by words or behaviour with sexual or sexist connotations, the purpose or effect of which is to undermine the dignity of the person or to create an intimidating, hostile, degrading, humiliating or offensive environment. The French Criminal Code distinguishes between a number of different types of offence of a sexist and sexual nature⁵.

Bullying⁶ is manifested by repeated actions or words that have the purpose or effect of degrading working conditions likely to harm the employee's human rights at work and their dignity, to alter their physical or mental health or to jeopardise their professional future.

Sexual harassment⁷ is the act of repeatedly imposing on a person statements or behaviours with sexual or sexist connotations that either violate their dignity due to their degrading or humiliating nature, or create an intimidating, hostile or offensive situation. Sexual harassment is the use, even if not repeated, of any form of serious pressure with the real or apparent aim of obtaining an act of a sexual nature, whether it is sought for the benefit of the perpetrator or for a third party.

All three forms of conduct are criminal offences punishable by law.

5. Article L. 1142-2-1 of the French Employment Code, Article R. 625-8-3 of the French Criminal Code and Article 222-33-1-1 of the French Criminal Code.

6. Articles L. 1152-1 of the French Employment Code and 222-33-2 of the French Criminal Code.

7. Articles L. 1153-1 of the French Employment Code and 222-33 of the French Criminal Code.

Illustrations

- Inappropriate or degrading comments about dress or physical appearance, insults, slander;
- Sexual remarks, gestures imitating or suggesting a sexual act, invitations to sexual relations even if suggested, obscene sounds;
- Signs of hostility towards a group or individual, exclusion.

Covéa's commitments

Covéa undertakes to prevent any form of sexist behaviour or harassment (and, where applicable, to sanction it in a proportionate manner), whether in the form of bullying or sexual harassment, by maintaining a working environment that protects its employees in all work situations. As required by law, Covéa provides its stakeholders with a specific procedure for reporting sexist behaviour and harassment in the workplace, in order to ensure that the report is handled and that an appropriate response is given to any reprehensible act.

Appropriate behaviours

- Being mindful of how our words or actions may be perceived by others, even when there is no malicious intent;
- If you are a victim or witness of harassment:
 - React, as everyone has a full part to play in tackling harassment;
 - Indicate your disapproval (if you are a direct witness) by referring, if necessary, to Covéa's internal regulations;
 - Report the incident (see "Contact persons" section);
 - Refer suspected victims of harassment to the right person (most often the harassment contact person).

Behaviours to be avoided/prohibited

- Saying things that tend to make a person feel uncomfortable repeatedly, putting pressure on them, preventing them from expressing themselves;
- Disregarding, discrediting, isolating or destabilising a person by acting repeatedly.

Case studies

A colleague complimented me on my dress. It made me uncomfortable. How should I react?

If this behaviour has not been repeated, it does not constitute harassment. Do not hesitate to respond by expressing your disapproval. If this behaviour is repeated, report it to the harassment contact person. However, it may be a gender-based insult if these compliments, even if not repeated, are degrading or humiliating in such a way that they violate your dignity. Then report the incident (see Contact persons section).

My manager regularly invites me to dinner, and insists despite several refusals. If I ask him to stop, I'm afraid it will adversely affect my career opportunities. What should I do?

If you have declined but the invitations persist, report it to the harassment contact person. The law prohibits you from being discriminated against for having suffered or refused to suffer these acts, or for having reported them.

Contact persons

- The company's prevention and occupational health department;
- "Sexual harassment and sexist behaviour" contact person for the company or the Social and Economic Committee (CSEE);
- Human Resources Manager (HRM);
- Manager;
- Occupational health service and labour inspection;
- Défenseur des droits;
- Social and Economic Committee (CSEE);
- Internal whistleblowing system (see dedicated section in the charter).



SOCIAL, SOCIETAL AND ENVIRONMENTAL RESPONSIBILITY

4. ENSURING HEALTH AND SAFETY AT WORK

Employers are required to take all necessary measures with regard to occupational health and safety for their employees in order to ensure the safety and protect the physical and mental health for them⁸. Occupational health and safety include the prevention of accidents at work, commuting accidents, occupational diseases and psychosocial risks.

Illustrations

Ensuring health and safety at work can be achieved through several concrete actions, including:

- actions to prevent occupational risks and hardship in the workplace (updating of the Single Risk Assessment Document, analysis of work contexts, etc.);
- actions to inform and train employees on health and safety such as communication of prevention guides, fire drills, workplace first-aid representative (SST) training, personal safety and assistance service (SSIP) training, gestures and postures, etc.;
- organisation of work as well as appropriate resources (adjustment of workstations, purchase of protective equipment if necessary, etc.).

Covéa's commitments

As required by law and in order to promote a protective professional environment, Covéa undertakes to take all necessary measures to ensure the safety and physical and mental health of its employees.

8. Article L. 4121-8 1 of the French Employment Code.

Appropriate behaviours

- Knowing, understanding and complying with the health and safety rules established by the Group;
- Reporting to the company's prevention and occupational health department any health or safety malfunction of the prevention systems, and more generally any event posing a risk;
- Following the prevention training offered;
- Ensuring that one's behaviour does not represent a risk to the safety and physical or mental health of employees;
- Assisting employees in physical or psychological distress, whenever possible.

Behaviours to be avoided/prohibited

- Failing to report or deliberately ignoring a situation that represents a potential health and safety risk to one or more employees;
- Going against the behaviours recommended by the prevention systems (ignoring the fire drill, the right to disconnect, etc.).

Case studies

A fire drill is planned in the next few days but I don't know the evacuation procedure or the assembly points. What should I do?

The fire evacuation procedure is displayed in all corridors on the sites. The Group also provides its employees with e-learning training in order to adopt the right actions in the workplace.

Over lunch, a colleague tells me about their psychological difficulties and excessive workload. What should I do?

I advise them to get in touch with their manager or HRM to talk about the situation and determine the appropriate level of support.

Contact persons

- Manager;
- Human Resources Manager (HRM);
- The company's prevention and occupational health department.



SOCIAL, SOCIETAL AND ENVIRONMENTAL RESPONSIBILITY

5. PROMOTING RESPECT FOR HUMAN RIGHTS

The concept of “human rights” is based on the idea that every human being has universal and inalienable rights regardless of the law in force in the state in which it is located and regardless of race, gender, nationality, ethnic origin or religion. This vision has been enshrined in numerous national and international texts (Declaration of the Rights of Man and of the Citizen, United Nations Charter, Universal Declaration of Human Rights).

Illustrations

- Right to freedom of expression and freedom of association;
- Right to work under fair conditions;
- Right to social welfare;
- Right to education, training and access to culture.

Covéa's commitments

The Group reaffirms its commitment to respect internationally recognised human rights enshrined in the French Constitution. Through the application of regulations on the duty of care, Covéa ensures that its activities are conducted in such a way as to respect human rights and the dignity of all, with regard to its employees, suppliers and subcontractors.

Appropriate behaviours

- Being vigilant in one's professional activities regarding respect for human rights;
- Reporting any violation or breach of human rights in the context of the professional activity, regardless of the stakeholders (employees, suppliers, etc.);
- Ensuring that suppliers and service providers respect social rights and fundamental freedoms.

Behaviours to be avoided/prohibited

- Contracting with a supplier or subcontractor that does not comply with employment laws or our ethical principles, in particular in the area of human rights;
- Assuming that operating in France, which is a highly protective state in terms of social rights, prevents any breaches from occurring in this area.

Case studies

Over lunch with a subcontractor, I learn about environmentally damaging practices at their company. What should I do?

You should report this situation to your manager or the purchasing department so that a supplier assessment can be carried out.

If the company in question has an internal whistleblower system, you can report the situation observed.

How can I find out about the measures that companies have put in place to respect human rights?

Companies report on their human rights protection measures in various forms: ethical charters or a vigilance plan when they are subject to them, within the meaning of the regulations on the duty of care. This document must be made public.

Contact persons

- Manager;
- Internal whistleblowing system (see dedicated section in the charter).



SOCIAL, SOCIETAL AND ENVIRONMENTAL RESPONSIBILITY

6. PROTECTING EMPLOYEES' DATA AND PRIVACY

As required by law, employers must protect the personal data of their employees, of which they are aware in the context of the employment relationship. Personal data may be characterised as any information relating to an identified or identifiable natural person.

Illustrations

Data processing may be carried out at multiple stages in an employee's life at work:

- personnel management, recruitment and career development;
- access control, video surveillance;
- telephone recordings.

Covéa's commitments

The Group is committed to providing transparent information on its use of data and guarantees its security and confidentiality.

The Group ensures that data relating to the private life of employees is respected by the applicable regulations.

Appropriate behaviours

- Attending data protection training;
- Respecting the privacy of colleagues and keeping their data confidential;
- Treating any personal database on employees lawfully and as strictly confidential information;
- Use the GDPR Incident application (available on the company's intranet) for any loss or fraudulent use of employees' data.

Behaviours to be avoided/prohibited

- Transmitting employee data to a third party of the Group (except in authorised cases: public authorities, criminal investigation officers⁹). In all cases, the identity and legitimacy of the recipient must first be identified;
- Collecting sensitive data (data relating to health, etc.) without a legitimate reason provided for by law;
- Creating a file of candidates for marketing insurance products.

Case studies

I notice that sensitive or inappropriate data has been entered into a comments field. What should I do?

Alert your manager if sensitive or inappropriate data is entered into a comments field.

Can I ask HR for the dates of birth of my team so I can celebrate birthdays?

While your intentions are certainly commendable, HR cannot give you information about any of your colleagues. However, you can obtain this information by directly asking the people concerned.

Contact persons

- Manager;
- Data Protection Officer (DPO).

9. Officier de Police Judiciaire in French.



SOCIAL, SOCIETAL AND ENVIRONMENTAL RESPONSIBILITY

7. PROTECTING THE ENVIRONMENT AND TACKLING GLOBAL WARMING

Any organisation, by its very existence, generates an environmental impact (greenhouse gas emissions, depletion of natural resources, destruction of biodiversity, etc.). Corporate Social Responsibility (CSR) consists, in particular for company, in voluntarily integrating environmental concerns in order to limit the impact of business activities, in particular the carbon footprint in accordance with the objectives set by the Paris Agreement.

Illustrations

- Carbon footprint;
- Travel optimisation;
- Renewable energies;
- Energy efficiency and energy savings plan;
- Biodiversity;
- Circular economy;
- Digital sobriety.

Covéa's commitments

The Group is constantly working to reduce its greenhouse gas emissions, for which it is directly or indirectly responsible, and is thus committed to implementing a climate strategy compatible with the Paris Agreement.

This commitment finds expression in various ways:

- reducing the environmental footprint;
- supporting customers by developing offers, services and compensation solutions that reduce their own environmental impact (promoting sustainable repairs, insurance per kilometre, price offers adapted to soft mobility, etc.);
- encouraging suppliers and partners to limit their carbon footprint (by assessing them and by choosing virtuous partnerships, etc.).

Appropriate behaviours

- Presenting active environmental protection as a key component of the Group's CSR policy to stakeholders;
- Adopting the eco-responsible individual behaviours promoted by the Group and taking initiatives to make them more virtuous for the environment;
- Reporting any finding of a breach or flagrant breach of the Group's environmental commitments in the course of business;
- Taking action to develop knowledge of sustainable development issues, through training, associated events, proposed initiatives, etc.

Behaviours to be avoided/prohibited

- Thinking and acting in the context of professional activity as if the Group were not concerned by the environment;
- Intentionally going against the environmental behaviours encouraged by the Group.

Case studies

I drive to work. Aware of the environmental impact this represents, I would like to know the possible alternatives.

In France, your employer will pay 75% of the cost of your public transport season ticket (including bike hire) for the journey between home and work. It has introduced a sustainable mobility incentive package to encourage travel using soft mobility.

You can also share journeys with your colleagues by carpooling.

As an employee of an insurance group, what types of environmental action could I take at my individual level?

You can put your computer on standby for short absences, limit printing, opt for black and white and regularly delete unnecessary emails.

Turn off the lights in offices and meeting rooms when you leave them.

Follow the waste sorting guidelines and limit the production of waste as much as possible.

Contact persons

- Manager;
- Social Engagement Department;
- Covéa Immobilier Department.



SOCIAL, SOCIETAL AND ENVIRONMENTAL RESPONSIBILITY

8. PROMOTING RESPONSIBLE PURCHASING

A purchase of goods or services can be considered responsible when it preserves the environmental, social and economic interests of all internal and external stakeholders in a balanced and sustainable manner. Responsible purchasing is a genuine driver of innovation and value creation and integrates the various aspects of sustainable development throughout the life cycle of the products or services purchased.

Illustrations

In a responsible purchasing approach, buyers and business units can choose to give priority to goods and services:

- with a lower environmental impact by promoting short supply chains, eco-design, energy savings, biodiversity preservation, recycling channels, etc.
- with a lower social and societal impact, with service providers that respect human rights, working conditions, the health and safety of individuals, ensure gender diversity, boost local economies, etc.
- with less economic impact by ensuring that the purchasing decisions taken also take into account an overall cost logic in relation to the product/service life cycle.

Covéa's commitments

The Group is committed to developing and maintaining a relationship of trust with its suppliers and service providers throughout the relationship. To this end, regular monitoring and assessments are carried out by the various players: business divisions, buyers and suppliers/service providers. For several years, Covéa's Purchasing policy has provided for two types of suppliers:

- the involvement, as soon as the market offer allows it, of at least one company from the sheltered and adapted work sector (STPA) in the consultations;
- inviting tenders from SMEs in order to support the fabric of the economy, provided that they can meet the relevant specifications.

In addition, the Group has a global system in place for assessing compliance and managing supplier risks.

Appropriate behaviours

- Ensuring the usefulness of the purchase: “buy less but buy better”;
- Adopting an overall long-term cost approach;
- Prioritising a "national" approach;
- Giving priority to suppliers who are committed to CSR.

Behaviours to be avoided/prohibited

- Systematically using the same suppliers;
- Frequently ordering small volumes;
- Considering price to be the only selection criterion;
- Giving preference to offers from large groups.

Case studies

I need to order office supplies for my department. How should I proceed?

The supplies catalogue includes eco-designed products; the aim is to give priority to these products and to group needs to reduce the number of orders. It is an economic and environmental action (delivery/transport).

A buyer offers me three suppliers, including a STPA company, an SME and my historical supplier. How should I choose?

In this case, it is appropriate to analyse, with the buyer, the three offers, paying particular attention to the suppliers that we do not yet know and by reasoning in terms of total cost/life cycle. For an equivalent offer, an STPA supplier should be preferred.

Contact persons

- Manager;
- Covéa Purchasing Performance and Strategy Department;
- Social Engagement Department.



CUSTOMER PROTECTION

1. PROTECTING THE INTERESTS OF CUSTOMERS AND PROVIDING THEM WITH APPROPRIATE ADVICE

By law, insurers have an obligation to inform and advise their customers. At the time that the customer takes out/signs up to the insurance policy and throughout the contractual relationship, the employee must listen to the customers to properly understand their expectations, assess their needs and, in light of their situation, offer them a suitable product consistent with their objectives, or advise them as best as possible on any transactions that may result in a significant change to their policy.

Illustrations

The upstream protection of the customer's interests involves:

- designing products with guarantees and services tailored to our customers by defining appropriate target markets;
- regularly reviewing products to ensure they meet the needs of the target market over time.

Then, in the distribution phase:

- providing clear and fair pre-contractual and contractual information;
- providing advice consistent with the customer's situation, profile, needs and objectives;
- allowing the policy to be terminated under the conditions provided for by law.

Covéa's commitments

In this context, the Covéa Group ensures that its customers are protected at the time they take out/sign up to the insurance policy and throughout the contractual relationship. This is reflected in understandable and transparent communications about the product offered and any transactions resulting in a significant change to their policy.

Appropriate behaviours

- Listening to and asking customers about their situation, profile, knowledge and experience of insurance products by clarifying their objectives, expectations and needs;
- Providing fair information to the customers and ensuring that they understand it;
- Offering and advising on products/transactions and services that are suited to the customer's profile and in line with their interests;
- Ensuring that products/transactions and services are presented clearly and accurately in line with the needs expressed;
- Ensuring fair treatment between customers;
- Taking into account the complexity of the products and the customers' level of knowledge in order to adapt the message accordingly;
- Always acting honestly, impartially and professionally in the best interests of the customer;
- Being attentive to signs of vulnerability among elderly people: concentration and understanding difficulties, geographical isolation, significant influence exerted by a third party or high dependence on a third party, passivity shown during the interview.

Behaviours to be avoided/prohibited

- Offering a product and/or transaction to customers by giving them inaccurate information or failing to disclose important information;
- Advising customers to buy a product/carry out a transaction that does not meet their needs in terms of their business objectives;
- Getting a customer to sign a contract in exchange for benefits on other products offered by the Group;
- Objecting to the termination of the policy where the customer meets all the conditions.

Case studies

A customer contacts me to ask to terminate their policy. They want to proceed with the cancellation despite my explanation of the benefits of their policy. Can I object to their request so as not to lose the customer, even though they meet all the conditions allowing them to terminate the policy?

No. The policyholder has a right to terminate the policy, which must be respected if the conditions for exercising it are met and if the policyholder's wish to terminate is clearly expressed.

An elderly customer contacts me to take out a life insurance savings policy. What is the right approach?

For a long-term investment such as this, particular care should be taken to ensure that the advice given is appropriate for the customer's age, objectives, level of financial knowledge and experience, risk profile and investment horizon. It is important to be attentive to the capacity of the elderly person to express informed consent, and to detect any signs of vulnerability. Analysis of the situation may result in the policy not being offered.

Contact person

- Manager.



CUSTOMER PROTECTION

2. IDENTIFYING AND HANDLING CUSTOMER COMPLAINTS

A complaint is the expression of dissatisfaction clearly expressed by the customer or any person, including where there is no contractual relationship, regarding the insurance policy, in respect of personal or professional risks. The handling of customer complaints must be efficient, equal and harmonised. The laws in this area provide a precise framework.

Illustrations

- Simplified access to the complaints handling system;
- Acknowledgement of receipt of the complaint within 10 days of it being sent;
- Clear and transparent information on how complaints are handled;
- A written response within two months of the customer's first complaint being sent.

Covéa's commitments

In order to ensure customer satisfaction and loyalty, the Group is committed to implementing practical and effective procedures for handling customer complaints. It guarantees the implementation of corrective actions in the event of identified malfunctions through the handling of complaints.

Appropriate behaviours

- Ensuring that complaints are directed to the appropriate contact person;
- Complying with the complaint handling procedures that have been put in place;
- Notifying the line manager in the event of malfunctions identified during the handling of complaints;
- Complying with the deadlines for handling complaints.

Behaviours to be avoided/prohibited

- Failing to pass on a complaint;
- Handling a complaint without clearly identifying its subject matter and the customer's specific requests;
- Using the complaint handling channels inappropriately.

Case studies

One of my colleagues insists that I deal with a family member's complaint as a priority. What should I do?

You must handle complaints in accordance with the procedures without granting preferential treatment to a particular customer.

I note that complaints have been sent to me when I am not the appropriate contact person for these cases. What should I do?

You must pass the complaint on to the appropriate contact person quickly in order to meet the processing deadlines.

Contact person

- Manager.



CUSTOMER PROTECTION

3. PROTECTING CUSTOMER DATA

By law, personal data can be characterised as any information relating to an identified or identifiable natural person. Any operation carried out on this data (collection, recording, modification, extraction, consultation, archiving, etc.) constitutes processing. The control of our customers' personal data is a guarantee of quality and confidence in our brands.

Illustrations

To ensure this protection, everyone must take care not to collect, transfer or store this data improperly and only use the data that are necessary throughout the business relationship:

- direct marketing;
- contract management;
- claims management

Covéa's commitments

The Covéa Group is committed to respecting the privacy of its customers and protecting their personal information. Covéa has implemented several measures to protect customer data, such as awareness-raising and training for its employees. The Group is committed to establishing an efficient organisation for the collection and processing of data.

Appropriate behaviours

- Ensuring the confidentiality and security of the personal information of customers of which we become aware in our duties;
- Passing on requests to exercise the rights of customers/prospects to the brands' customer relations departments;
- If in doubt, you should seek advice and assistance from the Data Protection Officer;
- Use the GDPR Incident application (available on the company intranet) in the event that you suspect hacking or a data leak.

Behaviours to be avoided/prohibited

- Disclosing information about a customer;
- Not respecting a customer's right to object to direct marketing;
- Collecting customer data on a personal and/or non-secure medium (USB key, mobile phone, etc.);
- Objecting to a request for the right of access to personal data;
- Enter sensitive information (data relating to health, etc.) in free-entry fields, or using inappropriate terms.

Case studies

A friend has just opened an IT services company. They ask me to send them a list of my customers' phone numbers so that they can directly market to them. What should I do?

Our customers' telephone numbers are personal data. They must not under any circumstances be disclosed to a person outside the Group.

During a meeting, a customer gives me information about their health status. What should I include in the customer's file?

You must not enter information about the customer's health in a free-entry field. Health data is sensitive. The information must be formulated in the most relevant manner possible for the contractual relationship.

Contact persons

- Manager;
- Data Protection Officer (DPO).



BUSINESS ETHICS

1. FIGHTING CORRUPTION

Corruption, or bribery, is an act by which someone in a specific public or private position proposes, requests or accepts a gift, offer or promise with a view to accomplishing, delaying or omitting to accomplish an act that falls directly or indirectly within the scope of their duties.

Illustrations

- Repeated invitations in prestigious locations in return for the renewal of a policy, without prior call for tenders;
- A commercial gesture to an entrepreneurial policyholder in return for an internship for a friend or relative.

Covéa's commitments

The Group reaffirms its zero-tolerance policy with regard to acts of corruption and influence peddling, regardless of the methods, circumstances or stakes involved.

Covéa employees must not directly or indirectly grant undue advantages of any kind to a third party by any means whatsoever, with the aim of obtaining or maintaining a commercial transaction or preferential treatment.

Any employee who is incited to commit an act of corruption must refer the matter to their line manager so that all appropriate measures can be taken to end the situation.

In accordance with the Sapin 2 law of 9 December 2016, Covéa has put in place a system for preventing and combating acts of corruption based, inter alia, on an Anti-Bribery Code of Conduct, a corruption risk map, training for exposed staff, rules governing gifts and invitations, hospitality and conflicts of interest, and a whistleblowing system that allows situations contrary to the Code of Conduct to be reported in complete confidentiality.

Appropriate behaviours

- Asking your manager if you have any doubts about the behaviour of a third party that may be contrary to our anti-corruption policy;

- Ensuring that any gifts or entertainment we offer are appropriate and consistent with our Anti-Bribery Code of Conduct;
- Immediately refusing any gift or invitation that might compromise your independent judgement;
- Declare all gifts received or sent and invitations above the €150 threshold using the online form available on the intranet;
- Comply with the rules governing hospitality (invitations made to third parties to an event organised by the Group).

Behaviours to be avoided/prohibited

- Promising, offering or accepting an advantage that may influence decision-making;
- Disclosing confidential information to a third party in return for any advantage;
- Accepting hospitality (sporting or cultural event) from a bidder during a call for tenders;
- Offering multiple tokens of hospitality of significant value to the same third party that exceed the permitted frequency thresholds.

Case studies

A good customer asks me for my home address in order to deliver me a “surprise” at the end of the year. How should I react?

You should refuse to disclose your address because sending business gifts to employees’ homes is strictly prohibited by the Anti-Bribery Code of Conduct.

I'm negotiating a big partnership. A consultant working with this partner offers to help me with the transaction by providing me with confidential information to facilitate the negotiation. What should I do?

You should not accept this proposal as it shows a breach of loyalty to the customer and could constitute an act of corruption if you pay them in exchange for confidential information.

Contact persons

- Manager;
- Compliance Department (ethique@covea.fr) ;
- Human Resources Manager (HRM);
- Internal whistleblowing system (see dedicated section in the charter).

To find out more:

Consult the Covéa Anti-Bribery Code of Conduct (available on the intranet and at www.covea.com) and the “Compliance/Anti-Bribery” page on the intranet.



BUSINESS ETHICS

2. PREVENTING CONFLICTS OF INTEREST

A conflict of interest refers to any situation in which the personal interests of an employee, executive or director, which could influence the independent performance of their duties, could conflict with those of the Group.

The interests at stake can take several forms (commercial, financial or personal advantages) and can concern both the individual and their friends or family.

Illustrations

- Participating in the selection of an external supplier in which the employee, executive or director holds shares or a mandate;
- An employee's spouse is a shareholder or executive in a company competing with the Group and requests the disclosure of confidential information about Covéa.

Covéa's commitments

The Group undertakes to prevent and manage any conflict of interest as soon as it becomes aware of it.

To that end, it asks its employees to disclose ties of interest that could lead to a conflict of interest in carrying out their duties.

For the sake of integrity, employees must not use their position within the Group to derive a direct or indirect personal benefit. In the event of a conflict of interest, the employee must not take part in the decision in question.

Any situation that may lead to a conflict of interest must therefore be reported to the Compliance Department, using the online form available on the intranet.

If the existence of a conflict of interest is confirmed, the Compliance department will determine the steps to be taken to remedy the situation (e.g. recusal of the employee).

Appropriate behaviours

- Acting in all circumstances in the best interests of the Group;
- Disclosing any ties of interest that may interact, directly or indirectly, with the position held within the Group;
- Reporting any potential or actual conflicts of interest to the Compliance Department as soon as they are identified;
- Implementing the remediation measures decided upon by the Compliance Department in order to put an end to the conflict of interest;
- Complying with the recruitment procedures defined by the Group;
- Declaring offices held outside the Group.

Behaviours to be avoided/prohibited

- Concealing potential conflicts of interest;
- Participating in the decision-making process in cases where your discretion may be impaired by personal considerations or a power, except when a remedial measure other than recusal has been decided upon by the Compliance Department;
- Offering or granting an advantage to a third party in order to induce them to do something or to omit to do something;
- Favouring a friend or relative in a call for tenders.

Case studies

A relative of mine has just started a business and is offering the Group its services at attractive rates. Can I recommend it to management?

You can recommend a member of your family. If, however, you participate in the decision-making process, you must comply with the internal procedures, report the situation to the Compliance Department and apply the remediation measures it decides upon (for example, recuse yourself from the decision-making process).

Can family members and close relatives of a Covéa employee be hired by the Group?

Hiring, determining or supervising the terms of employment of a friend or relative are situations that may give rise to conflicts of interest. Given the ties of interest between you and your friend or relative, your judgement may be impaired and challenged. Report this situation to the Compliance Department and comply with the remediation measures decided upon by it.

Contact persons

- Manager;
- Compliance Department (ethique@covea.fr) ;
- Human Resources Manager (HRM);
- Internal whistleblowing system (see dedicated section in the charter).

To find out more:

Consult the Covéa Anti-Bribery Code of Conduct (available on the intranet and at www.covea.com) and the "Compliance/Anti-Bribery" page on the intranet.



BUSINESS ETHICS

3. FIGHTING INTERNAL AND EXTERNAL FRAUD

Fraud is defined as any act or omission intentionally committed by one or more natural person or legal entities in order to obtain an advantage or benefit in an illegitimate, unlawful or illegal manner. It may have an internal source (e.g. employees) or external source (e.g. customer or cyber malware) to the Group.

Illustrations

- Misappropriation of goods and services;
- Breach of trust;
- Theft or misappropriation;
- Identity theft;
- Fraud against the Chairman;
- Insurance fraud.

Covéa's commitments

The Group actively fights internal and external fraud. Rules are applied in the most exposed business divisions. In addition, specialised divisions carry out analyses to prevent any case of internal or external fraud, in particular in compliance with the legal rules of confidentiality and data protection. Lastly, the Group raises its employees' awareness of the impacts of such fraudulent acts and the practices to be followed in order to avoid them. In order to strengthen these actions, the internal whistleblowing system can be used to report any suspicion of fraud observed by employees in carrying out their duties.

Appropriate behaviours

- Remaining vigilant about the risk of fraud in daily business practices;
- Complying with the procedures put in place by the Group, in particular the charter on the use of the information systems;
- Reporting any suspicion of internal or external fraud;

- Not acting hastily and taking the time to contact the manager in the event of unusual requests, especially those emanating outside the company;
- Keeping in mind that all goods, even those of low value, or documents made available by the Group are the property of Covéa.

Behaviours to be avoided/prohibited

- Using the Group's resources in a personal capacity (equipment, information, etc.);
- Falsifying official Group documents;
- Making false declarations on your expense claims;
- Making false declarations about your working time (badge fraud);
- Managing your own policy, claim or service or that of a personal relationship;
- Clicking on emails of questionable origin (unknown sender, suspicious content, etc.);
- Providing sensitive information by phone without knowing the identity of the correspondent;
- On social media, providing precise information about the Group that could be used by malicious persons.

Case studies

When managing a claim, an acquaintance asks me to manage their file. What should I do?

You are required to comply with the procedures in force and applicable to the performance of your tasks. In this respect, you are prohibited from using your capacity as an employee to intervene in any form whatsoever in the management of a file in which you have a personal interest or for the benefit of a relationship.

I work in the accounting department, and just received a call from someone claiming to be a CEO. They asked me to transfer a large sum of money, urgently, to an account number they gave me on the phone. What should I do?

In this situation, it is imperative that internal procedures be followed. Make sure you never give out company information, and inform your manager of any suspicious calls.

Contact persons

- Manager;
- Human Resources Manager (HRM);
- Internal whistleblowing system (see dedicated section in the charter);
- User support or sos-spam@covea.fr: if a suspicious email is received.



BUSINESS ETHICS

4. ACTING ETHICALLY TOWARDS EXTERNAL STAKEHOLDERS

Ethical business conduct means maintaining business relationships based on integrity, loyalty and mutual respect, in compliance with applicable laws. This includes treating competitors fairly and building relationships with business partners based on trust and transparency.

Illustrations

- Complying with competition laws;
- Promoting ethical practices to external stakeholders;
- Complying with our contractual commitments to our business partners;
- Settling suppliers' invoices by payment deadlines.

Covéa's commitments

The Group adheres to the principle of free competition and undertakes to maintain honest and fair relations with its customers, suppliers and subcontractors.

All information about the market and Covéa's competitors is obtained by transparent and appropriate means.

The Group is committed to being vigilant about the quality of the relationships it maintains with its stakeholders, based, inter alia, on an evaluation of its third parties aimed at increasing the security of its business relationships.

The Group does not engage in dishonest, illegal or unethical activities.

Appropriate behaviours

- Communicating honestly about our products and services and allowing balanced, accurate and verifiable comparisons with those of our competitors;
- Publicising and promoting the Group's values by disseminating the Anti-Bribery Code of Conduct and inserting anti-bribery contractual notices;
- Behaving fairly and transparently towards stakeholders, in particular during calls for tenders;
- Assessing a stakeholder's integrity when selecting a stakeholder (or renewing a contract).

Behaviours to be avoided/prohibited

- Denigrating or discrediting competitors;
- Using information about an external stakeholder for malicious purposes;
- Sharing sensitive information about the Group (strategy, financial and commercial information, etc.) in relationships with competitors;
- Selecting a supplier that does not respect human rights;
- Abruptly terminating an established business relationship.

Case studies

I notice that a supplier has breached its contractual obligations and I want to delay paying its invoice. Am I permitted to do so?

Even if the service provided is not satisfactory, the invoice must be paid within the legal deadlines, as non-compliance with the payment deadlines is punishable by an administrative fine.

You can report your dissatisfaction to the Purchasing Performance & Strategy Department via a request for support.

When buying a service, a bidder I know contacts me to obtain information about the Group so that they can respond more appropriately to the call for tenders. What should I do?

You must not give any information to this person to preserve fairness among bidders. Any information that favours a bidder may undermine the decision made at the end of the call for tenders.

Contact persons

- Manager;
- Compliance Department (ethique@covea.fr).



BUSINESS ETHICS

5. COMBATING MONEY LAUNDERING AND TERRORIST FINANCING (AML/CTF)

Money laundering is the use of the economic and financial system to transform income from illegal activities into lawful resources. Terrorist financing consists of providing or raising funds that could be used to commit a terrorist act or to finance an organisation. By law, insurers are subject to due diligence obligations to tackle money laundering and terrorist financing.

Illustrations

- Vigilance exercised in life insurance: origin of funds not documented, early redemption, atypical transactions on old contracts, etc.
- Vigilance exercised in non-life insurance: use of property damage insurance for assets that do not correspond to the customer's profile, subscription and implementation of collective protection policies for fictitious employees (social fraud).

Covéa's commitments

The Group is committed to tackling money laundering and terrorist financing and has for years deployed a system based on risk classification with associated levels of vigilance, identification and knowledge of customers, particularly "sensitive" persons, constant vigilance on transactions, reporting of suspicions to Tracfin, mandatory training and internal control. A system for freezing the assets of customers and beneficiaries included on official lists is also applied.

Appropriate behaviours

- Complying with the anti-money laundering and counter-terrorist financing procedures put in place by Covéa;
- Placing great importance on information known about the customer and any person in a business relationship, at all times during the contractual relationship;
- Remaining alert at all times to unusual, complex transactions without documentation from the customer and, if in doubt, contacting the Tracfin correspondent and reporting officer immediately;
- Detecting all persons subject to asset freezing measures and applying the defined procedure;
- Regularly attending AML-CFT training.

Behaviours to be avoided/prohibited

- Participating in, advising on and facilitating any investment or concealment of funds;
- Disclosing to a customer that they are the subject of anti-money laundering suspicions or disclosing such information to a third party;
- Not requiring proof of the origin of life insurance funds, on the pretext of knowing the customer for a long time.

Case studies

I note several atypical transactions on a life insurance policy, in particular a transaction to a country listed as a Non-Cooperative State or Territory (NCST). What should I do?

If you are unsure about a transaction, be sure to check all the information available to you. If these do not dispel your doubt, immediately contact your line manager and your Tracfin correspondent and reporting officer.

A new customer does not want to provide me with an identity document, which is necessary to take out a life insurance policy. I dare not insist for fear of losing a customer. What should I do?

If a customer refuses to send you identity documents, you should insist. If the customer still does not wish to send you these documents, contact your line manager and your Tracfin correspondent and reporting officer.

Contact persons

- Manager;
- Tracfin correspondent and reporting officer.

To find out more:

See the "Compliance / AML-TF" page on the intranet.



BUSINESS ETHICS

6. APPLYING INTERNATIONAL SANCTIONS

International sanctions are restrictive measures imposed by an intergovernmental organisation/State with a view to causing a change in the behaviour/policies of the State, the region or the natural or legal persons targeted by the measures. These measures, enacted by the United Nations, the European Union or by individual States, such as France or the United States of America, can take different forms (military or sectoral embargoes, asset freezes, etc.). These measures must be applied and complied with.

Illustrations

Complying with international sanctions involves:

- checking that third parties involved in the transaction/business relationship are not subject to international sanctions (assets freezes);
- checking whether they are connected with a country subject to international sanctions (place of establishment of the partner, location of the customer's business, geographical area of the risk covered, etc.).

Covéa's commitments

The Group ensures that the business relationships to which it is party and the business activities it carries out are not in conflict with the various applicable sanctions regimes. Rules in this area have been laid down at Group level.

Appropriate behaviours

- Following the procedures put in place by Covéa on compliance with international sanctions;
- Being alert to the existence of a connection with a country subject to sanctions, in the context of the business relationship or the proposed transaction.

Behaviours to be avoided/prohibited

- Entering into a business relationship without first ensuring that the contracting party is not subject to international sanctions or that the proposed activity/transaction is not prohibited by such sanctions;
- Participating in a transaction aimed at circumventing applicable international sanctions.

Case studies

A customer sends me a request for insurance to cover the transport of goods exported to North Korea, stressing the very urgent nature of their request. What should I do?

North Korea is a country subject to multiple international sanctions. Despite the urgent nature of the request, as stressed by the customer, you must comply with and apply all the procedures in force.

A customer sends me a request for insurance to cover a shipment to a third country, without specifying the country in question or the nature of the goods being shipped. Can I comply with their request?

The lack of information provided means that you cannot comply with this request. You need to identify the country in question in order to ensure that it is not targeted by international sanctions. It is also essential that you obtain information about the nature of the goods involved in the transaction, as a sector-specific embargo may apply. You must therefore ask the customer for this additional information.

Contact persons

- Manager;
- Compliance Department (ethique@covea.fr).



BUSINESS ETHICS

7. COMPLYING WITH MARKET ABUSE RULES

Market abuse is the unlawful behaviour of various market participants that undermines the transparency of the market in which they operate, which harms stock market investors. Such behaviour is sanctioned by the French Financial Markets Authority (Autorité des marchés financiers - AMF) and the criminal courts. Market abuse rules aim to ensure market integrity and preserve investor confidence. In the event that these rules are breached, the investment services provider and the individuals under its authority may be liable for disciplinary, financial, civil and criminal penalties.

Illustrations

- Insider trading (placing orders using inside information);
- Unlawful disclosure of inside information (unlawful disclosure to a third party of confidential information held in the course of one's duties or mandate);
- Price manipulation (unlawful conduct influencing the price of a financial security).

Covéa's commitments

Transactions carried out by employees in the course of their duties or on their own account must comply with the regulations governing financial activities. Therefore, any employee who has access to inside information (permanent or occasional insider) must preserve its confidentiality by refraining from disclosing inside information to a third party and by refraining from carrying out any transaction as long as the information has not been made public. The use of this information to make a profit or avoid a direct or indirect personal loss is illegal (criminal and AMF sanctions) and contrary to the Group's rules of conduct.

The Covéa Group is committed to raising awareness among employees concerned by these situations.

Appropriate behaviours

- Refraining from using inside information of which one becomes aware in the course of one's duties or mandate when carrying out transactions in the financial instrument in question;
- Ensuring that insider information is not disclosed to others outside the strictly professional context and who are not included in the insider list;
- Refraining from recommending the acquisition or disposal of the financial instrument in question to a third party;
- Complying with the internal procedures and restrictions that apply to the Group's financial operations and transactions.

Behaviours to be avoided/prohibited

- Disclosing inside information to a third party or to unauthorised employees;
- Disclosing confidential information obtained in the course of the professional activity to friends or family.

Case studies

One of my customers tells me that the company he runs is in negotiations to expand its market and buy out a competitor. He tells me that this takeover will have a significant impact on the value of the shares in these companies. He advises me to be ready to buy shares in one of them. Can I do so?

This information was obtained in a professional capacity and the information has not been made public. Do not use this inside information for personal purposes. Do not share this information with unauthorised colleagues, friends or relatives or third parties. Use of the information would constitute market abuse and, more specifically, insider trading. These illegal practices are punishable by law.

A friend informs me of the loss of their company's largest customer, because they know that Covéa is a shareholder in that company. At the same time, he also tells me that this information has not been made public. Can I disclose this information to my line manager?

No, because it is inside information that has not been made public.

Contact persons

- Manager;
- Compliance Department.



PROTECTING THE GROUP'S ASSETS

1. ENSURING THE PROTECTION AND CONFIDENTIALITY OF GROUP DATA

All data and information of which employees become aware in the course of their duties or assignments constitutes an essential intangible asset and are part of the Covéa Group's assets. They must necessarily be managed in accordance with the regulations, rules and processes in force, particularly in terms of business secrecy.

The protection of the Group's data requires everyone to use it fairly and in compliance with their duty of confidentiality. Before transmitting information, it is important for everyone to consider the importance of the information, its character and its degree of sensitivity.

Illustrations

- Business information: brands, know-how, market information, pricing, offers, studies;
- Data from members, customers, suppliers and subcontractors.

Covéa's commitments

Covéa is committed to complying with data protection laws. It is also committed to making all users aware of the protection of the Group's data, that of its members and customers, and that of other stakeholders. To this end, it has drawn up a Charter on the use of the Information Systems, appended to the internal regulations, and trains its employees on the protection of personal data.

Appropriate behaviours

- Ensuring that third parties are authorised to receive data before it is disclosed;
- Being particularly vigilant about protecting the data of our customers, subcontractors and suppliers;
- Ensuring that documents containing confidential data are not disclosed to anyone outside the Group without authorisation;

- Refraining from using Group information for personal purposes or for the benefit of a friend or relative;
- Issuing an alert in the event that sensitive or confidential information is disclosed; if the disclosure includes the data of our members and customers, use the GDPR Incident application (available on the company intranet);
- Not keeping business data when leaving the Group;
- Keeping all sensitive company information confidential, including customer data, business strategies and product information.

Behaviours to be avoided/prohibited

- Making public any internal Group document without authorisation;
- Keeping business data after leaving the Group;
- Disclosing the Group's internal directory or structure chart to a third party;
- Disclosing information about the Group over the phone without being certain of the caller's identity;
- Leaving sensitive documents visible to all or sharing confidential information with unauthorised third parties.

Case studies

A colleague sends me the minutes of a Strategy Committee meeting that I was unable to attend. As I still have an hour's travel time, I decide to open this document on public transport. Am I permitted to do so?

You should avoid working on this type of document on public transport. It is recommended that you use a privacy filter on your PC in public areas.

A friend of mine, a graphic design student, offers to put together the slide show that I will present at an upcoming committee meeting. Can I send them my document by email?

No, you may not disclose an internal document to a third party who does not have a working relationship with you.

If the document is not confidential, you may want to ask a colleague to help you.

Contact persons

- Manager;
- GDPR Incident Application (available on the company intranet) in the event that the data of our members and customers is disclosed.



PROTECTING THE GROUP'S ASSETS

2. ENSURING THE SECURITY OF THE GROUP'S INFORMATION SYSTEMS AND EQUIPMENT

Information systems (IS) are all the company's resources used to manage information: hardware, software, applications and data. IS security is crucial to the Group's business continuity. These systems are exposed to numerous vulnerabilities due in particular to the large number of exchanges and networks and the opening of the IS to the outside world.

Therefore, the individual ethics that each person must apply when using the IS must comply with the primary purpose of the technologies, the integrity of the IS, the security of the system and equipment, and the implementation of general principles of good conduct, in accordance with the Covéa IS User Charter.

The main issues raised by the use of IS concern the protection of data, particularly personal data. Emphasis should be placed on its confidentiality, by controlling and monitoring its use, integrity, availability and the traceability of the actions undertaken on the IS.

Illustrations

- User authentication system to access the Group's information systems;
- Controls on the use of the information systems to detect dangers or abusive uses or uses contrary to the rules of confidentiality, integrity, availability and traceability.

Covéa's commitments

The Covéa Group has a Charter on the use of the Information Systems in place that defines the rights and duties of users in the context of the use of IT tools provided to them. This charter sets out the applicable laws and describes prohibited practices and points of vigilance regarding the use of the internet and email.

Employees must comply with this charter and the Global Information Systems Security Policy (PGSSI) in force within the Group.

The Covéa Group has also set up a prevention system containing a training course, recurring phishing exercises and regular communication campaigns. Its resources must only be used in the context of employees' professional activity, defined by their function, and within the limits of the delegations granted to them.

Appropriate behaviours

- Respecting the integrity of the configurations;
- Saving business documents to shared folders;
- Securing any transmission of professional information outside the Group through appropriate measures;
- Being alert to phishing attempts, requests for confidential information and curiously attractive proposals, or any suspicious solicitation that arrives via the various communication channels (email, telephone, SMS, social networks, trade fairs, etc.);
- Reporting to your manager or the IT department any anomaly, suspicious activity, security breach and any identified or suspected incident that might compromise the confidentiality, integrity or availability of systems or data;
- Strictly adhering to the security policies in force, including locking devices when not in use (including workstations);
- Keeping all sensitive information relating to the security of the information system confidential, including the measures, tools or systems deployed;
- Using the company's resources for business purposes only, and not using them for personal purposes.

Behaviours to be avoided/prohibited

- Using the same password for different applications;
- Giving your password to a colleague to help them out;
- Not complying with the Information Systems Security Policy and the Charter on the use of the information systems;
- Using the company's assets, such as equipment or information, for personal purposes or for personal gain;
- Disabling or circumventing security software or protocols for convenience or to save time;
- Discussing confidential projects or data in public places or on unsecured communication platforms.

Case studies

I'm retiring soon. I want to keep my work computer work because I don't have one. Can I do that?

No, because your computer is a resource that belongs to Covéa. It has been entrusted to you for work purposes. When you leave your position, you must return all the equipment and documents provided by Covéa.

A friend advised me to install software on my work computer. What should I do?

The computer provided by the Covéa Group is equipment that belongs to it. All employees must use the equipment provided in a manner that respects the integrity of the configurations provided. In such a case, it is possible to submit a request to the IT department.

Contact persons

- Manager;
- Chief Information Security Officer (CISO);
- Human Resources Manager (HRM).

*For more information, go to the intranet:
the Covéa Group Charter on the Use of the Information Systems.
the Global Information Systems Security Policy.*



PROTECTING THE GROUP'S ASSETS

3. COMMUNICATING RESPONSIBLY

Communications with third parties are binding on the Covéa Group. All communications with external third parties must be accurate and comply with legal, regulatory and internal obligations. In order to avoid any damage to the Group's interests and reputation, it is essential that care be taken when messages are sent externally.

Illustrations

- Communication through the media and social media;
- Communication to analysts, regulators and other authorities.

Covéa's commitments

The Covéa Group is committed to ensuring that all employees are aware of the potential impact of their personal comments on the Group's image and reputation. Covéa is committed to guaranteeing the freedom of expression of its employees, insofar as their comments do not harm the Group's interests. In order to control the Group's communications, only duly authorised and empowered employees may make statements and speak on behalf of the Group to the media, authorities, social media or other organisations.

Unauthorised employees are prohibited from creating pages or accounts in the name of the Group on the internet, using the Group's logos or its brands, or speaking in the name of and on behalf of Covéa.

At the same time, Covéa undertakes to do everything in its power to remove any defamatory remarks that employees may be subjected to in the course of their duties.

Appropriate behaviours

- Being vigilant and discerning with regard to any external solicitation concerning the Covéa Group and its organisation;
- Informing the line manager and the External Communications department of any external and internal request to speak about the Group, its activities or its operations, and following up only after authorisation;
- Ensuring compliance with the obligation of loyalty towards the Group and refraining from any disparaging remarks, including on social media;
- Complying with the obligation of confidentiality linked to the employment contract both in the exercise of one's function and in one's private sphere.

Behaviours to be avoided/prohibited

- Speaking on behalf of the Group to the media or on social media without authorisation;
- Communicating about the Group's activities and projects externally without authorisation;
- Disclosing information about the Group to a third party who cannot be identified, including on the phone or on social media;
- Disclosing confidential information about the Group externally.

Case studies

On my way out of the office, a journalist is outside the door (or contacts me on social media) and wants to ask me questions about an activity related to the Group. What should I do?

Do not provide any information, and then inform your line manager of this journalist's request.

My department has just signed an external partnership. Am I allowed to talk about it on social media?

As an employee, you are only authorised to announce an external partnership if it is already made public by the Group, in particular via the covea.com website and/or its social networks @groupecovea.

My friend, who works for a French media company, calls me and asks me about the Group's new structure. What should I do?

You should not respond but advise your friend to contact the External Communications press department for public information about the Group.

Contact persons

- Manager;
- External communications: presse@covea.fr.



INTERNAL WHISTLEBLOWER SYSTEM

Covéa's internal whistleblowing system can be used to securely report offences or breaches in the fields covered by law¹⁰, in connection with the Group's business activities.

It is open to employees, former employees, job applicants, members of the Group's governance bodies, customers and members, as well as to external stakeholders as part of the duty of care.

Use of the system is optional, but is appropriate if the facts are serious, as it ensures that the whistleblower's identity will remain confidential and provides them with subsequent protection.

Alerts can also be issued to the competent authority and assistance may be obtained from the *Défenseur des droits*.

Illustrations

The system can be used by all Group employees and external stakeholders to report events such as:

- offences or breaches of laws;
- threats or risks to the public interest;
- breaches of Covéa's Anti-Bribery Code of Conduct;
- risks of serious breaches of human rights, fundamental freedoms or health and safety obligations, or environmental offences.

Covéa's commitments

The Covéa Group is committed to ensuring that the identity of whistleblowers remains confidential and to allowing anonymous reports.

It undertakes to ensure that no disciplinary measure or sanction will be taken against an employee who uses the internal whistleblowing system in good faith, even if the facts subsequently prove to be inaccurate.

Conversely, misuse of the system may expose employees to disciplinary sanctions as well as legal proceedings.

10. Law of 9 December 2016 on transparency, tackling bribery and the modernisation of economic life and the Law of 27 March 2017 on the duty of vigilance of parent companies and contracting companies.

Appropriate behaviours

- Contact your manager or the Compliance Department if you have any doubts about the situation;
- Act in good faith, i.e. you must have a good reason to believe that the facts reported are true;
- Substantiate the facts reported with supporting evidence attached to the declaration;
- Be as objective as possible when describing the facts.

Behaviours to be avoided/prohibited

- Using the whistleblowing system to report facts known to be false;
- Submitting a report to harm a colleague;
- Making defamatory allegations;
- Using the whistleblowing system to simply report an internal malfunction or dissatisfaction, an offence committed by a third party not acting on behalf of Covéa, or an AML-CFT alert.

Case studies

How do I know whether I can benefit from whistleblower protection?

A whistleblower is defined by law: an individual who reports or discloses, without receiving any direct financial compensation and in good faith, information relating to a crime, offence, threat or harm to the public interest, a breach or an attempt to conceal a breach of a French law or regulation, a European Union law or an international commitment ratified or approved by France.

How am I protected in concrete terms?

The system ensures the confidentiality of the identity of the whistleblower, the persons concerned and the information gathered at all stages of the whistleblowing process. This confidentiality is guaranteed by the use of encrypted exchanges on a dedicated platform that is accessible only by a limited number of authorised employees. They are bound by a strict duty of confidentiality, breaches of which are punishable by two years' imprisonment and a fine of €30,000.

Contact persons

- Manager;
- Compliance Department (ethique@covea.fr);
- Access the Covéa internal whistleblowing system: <https://covea.whispli.com/signalement>.



MUTUAL GROUP INSURANCE COMPANY

governed by the French Insurance Code

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