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# Covéa ethics charter

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December 2021



# EDITORIAL

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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 members, customers 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 preserving 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.



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**Thierry DEREZ**  
Chairman and Chief Executive Officer

# OUR VALUES

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Covéa is a mutual insurance group committed to serving 11.6 million members and customers. Our Group is a leader in property and liability insurance. Built around four strong brands, MAAF, MMA, GMF and Fidélia, Covéa provides attentive, efficient and local support to nearly 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 members and customers.

Throughout France, our 21,000 employees support our policyholders at every stage of their lives and projects. They embody and put into action the values shared by the entire Group: human commitment, proximity, solidarity, responsibility and the search for progress.

## HUMAN COMMITMENT

Available and attentive, our teams work every day for our 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 or through their foundations.

## 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

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## 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 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

## Promoting inclusion and diversity

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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

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- 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

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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 :

- Negotiation and signing of collective 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.

### Appropriate behaviours

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- Promoting caring attitudes towards all in daily professional behaviour;
- Promoting the integration of everyone into the working environment without distinction;
- Knowing the legal discrimination criteria<sup>1</sup>;
- Ensuring inclusiveness on a daily basis and in all team events (meetings, seminars, etc.).

## Behaviours to be avoided/prohibited

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- Avoiding any behaviour and decision that would hinder the inclusion of a person and cause his/her exclusion, a degraded working atmosphere, an impact on individual and collective results;
- Making repeated mockery and jokes about a colleague.

## Case studies

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

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

- You must be exemplary and exclude any form of disrespectful words or actions ;
- You watch out for possible signals within your team ;
- You 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, intolerance of certain inappropriate attitudes or words ;
- Taking an interest in the singularities, opinions and ideas of all ;
- Sharing the idea that diversity is a source of wealth within a team.

## Contact persons

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- Manager ;
- Human Resources Manager (HRM) ;
- If you witness discrimination: whistleblowing system (see dedicated paragraph in the charter).

# Social, societal and environmental responsibility

## Combating all forms of discrimination

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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, education.

Discrimination can be :

- Direct, when 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 neutral on its face, but is likely to place persons at a particular disadvantage compared to others.

### Illustrations

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The law<sup>2</sup> defines 24 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 his or her apparent or known economic situation, ability to express himself/herself or herself in a language other than French, bank domiciliation.

### Covéa's commitments

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Covéa is committed to maintaining an inclusive environment and protecting its employees so that everyone finds their place and is respected. Thus, the Group is committed to implementing awareness-raising measures to prevent the consequences and risks of discrimination and to applying appropriate sanctions when discrimination is proven.

### Appropriate behaviours

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- Knowing, understanding and complying with the laws in force (24 criteria of discrimination<sup>3</sup> and penal sanctions<sup>4</sup>), 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.



<sup>2</sup> Article 225-1 of the French Criminal Code

<sup>3</sup> See paragraph «Illustrations» on page 8

<sup>4</sup> Article 225-2 et seq. of the French Criminal Code



## Behaviours to be avoided/prohibited

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- 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, clients, partners, candidates, suppliers, etc.).

## Case studies

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

This employee may:

- Tell him about his discomfort with these comments and mention the discriminatory and punishable nature of his remarks;
- Suggest that he follow the «Diversity to make a difference» training course;
- Contact, depending on your choice, your manager, your HRM, or the «sexual harassment and sexist behaviour» contact person.

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

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

## Contact persons

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- Manager ;
- Human Resources Manager (HRM) ;
- «Sexual harassment and sexist behaviour» contact person for the company or the Establishment's Social and Economic Committee (CSEE) ;
- If you witness discrimination: whistleblowing system (see dedicated paragraph in the charter).

# Social, societal and environmental responsibility

## Fight against all forms of sexist behaviour and harassment

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Sexist conduct<sup>5</sup> 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.

Moral harassment<sup>6</sup> 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 his/her dignity, to alter his/her physical or mental health or to jeopardise his/her professional future.

Sexual harassment<sup>7</sup> is the act of repeatedly imposing on a person statements or behaviours with sexual or sexist connotations that either violate his/her 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 types of conduct are criminal offences punishable by law.

### Illustrations

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- 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

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Covéa undertakes to prevent any form of harassment (and, where applicable, to sanction it in a proportionate manner), whether moral or sexual, by maintaining a working environment that protects its employees in all work situations. In accordance with the regulations, Covéa provides its stakeholders with a specific procedure for reporting 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

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- Paying attention to how our words or actions may be perceived by others, even when there is no malicious intent ;



<sup>5</sup> Article 621-1 of the French Criminal Code

<sup>6</sup> Articles L. 1152-1 of the French Labour Code and 222-33-2 of the French Criminal Code

<sup>7</sup> Articles L. 1153-1 of the French Labour Code and 222-33 of the French Criminal Code

- If you are a victim or witness of harassment :
  - React, everyone is fully involved in the fight against harassment ;
  - Indicate your disapproval (if you are a direct witness) by referring, if necessary, to Covéa's internal regulations ;
  - Report the incident (see paragraph «Contact persons»);
  - Refer suspected victims of harassment to the right person (most often the harassment contact person).

## Behaviours to be avoided/prohibited

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

## Case studies

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### **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 paragraph Contact persons).

### **My manager regularly invites me to dinner, and insists despite several refusals. If I ask him to stop, I'm afraid it will hurt me. 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

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- Manager ;
- Human Resources Manager (HRM) ;
- «Sexual harassment and sexist behaviour» contact person for the company or the Establishment's Social and Economic Committee (CSEE) ;
- Occupational health service and labour inspection ;
- Defender of Right ;
- If you witness harassment: whistleblowing system (see the dedicated paragraph in the charter) ;
- Social and Economic Committee (CSEE) ;
- If you witness discrimination: whistleblowing system (see dedicated paragraph in the charter).

# Social, societal and environmental responsibility

## Ensuring health and safety at work

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The employer is required to take all necessary measures with regard to occupational health and safety for its employees in order to ensure the safety and protect the physical and mental health of its employees<sup>8</sup>.

Occupational health and safety includes the prevention of accidents at work, commuting accidents, occupational diseases and psychosocial risks.

### Illustrations

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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: 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

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In accordance with its legal obligations and in order to promote a protective professional environment, Covéa undertakes to take all necessary measures to ensure the safety of its employees and their physical and mental health.

### Appropriate behaviours

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

## Behaviours to be avoided/prohibited

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- 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

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**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.

**During a lunch, a colleague tells me about his psychological difficulties and his overwork.**

**What should I do?**

I invite him to get in touch with his manager or his HRM to share the situation and define the appropriate support.

## Contact persons

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- Manager;
- Human Resources Manager (HRM);
- Occupational health and safety (OHS) unit.

# Social, societal and environmental responsibility

## Promoting respect for human rights

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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 he/she 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

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

### Covéa's commitments

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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

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- 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.) ;
- Ensure that the suppliers and service providers respect social rights and fundamental freedoms.

## Behaviours to be avoided/prohibited

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- Contracting with a supplier or subcontractor that does not comply with labour law 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 violation in this area.

## Case studies

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**Over lunch with a subcontractor, I learn about environmentally damaging practices in his 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 a 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

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- Manager;
- Whistleblowing system (see dedicated paragraph in the charter).

# Social, societal and environmental responsibility

## Ensuring the protection of employee data and their privacy

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In accordance with the regulations, the employer is required to protect the personal data of its employees, of which it has knowledge in the context of the employment relationship p.

Personal data can be characterised as any information relating to an identified or identifiable natural person.

### Illustrations

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Data processing can be carried out at multiple stages of an employee's life:

- Personnel management, recruitment and career development;
- Access control, video surveillance;
- Phone recording, teleworking.

### Covéa's commitments

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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

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- 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;
- Immediately informing your manager or the Data Protection Officer (DPO) or a member of the « data protection » department (DPO department) of any loss or fraudulent use of employee data.



## Behaviours to be avoided/prohibited

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- Transmitting employee data to a third party of the Group (except in authorised cases: public authorities, criminal investigation officer) without being certain of the position of the recipient (e.g. by phone) ;
- Collecting sensitive data without a legitimate reason provided for in the texts ;
- Creating a file of candidates for marketing insurance products.

## Case studies

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**My employer wants to use my photo in an internal Group newspaper. I don't want my photo to appear in this one. What can I do?**

Your employer must obtain your consent before using your photo for this type of document.

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

Alert your manager if sensitive or inappropriate data is entered in a comment 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 one of your colleagues. However, you can obtain this information by asking the people concerned directly.

## Contact persons

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- Manager ;
- Data Protection Officer (DPO), where applicable the DPO department.

# Social, societal and environmental responsibility

## Protecting the environment and fighting global warming

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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 the 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

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

### Covéa's commitments

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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 is materialised in various ways :

- Reducing the environmental footprint;
- Supporting customers by developing offers, services and compensation solutions that reduce their own environmental impact ((insurance per kilometre, tariff offers adapted to soft mobility, etc.);
- Encouraging suppliers and partners to limit their carbon footprint (by assessing them, by choosing virtuous partnerships, etc.).

### Appropriate behaviours

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- 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 ;
- Mobilising in order to develop knowledge of sustainable development issues, through training, associated events, proposed initiatives, etc.

## Behaviours to be avoided/prohibited

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- 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

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

Your employer will pay 50% of the cost of your public transport season ticket (including bike hire) for the journey between home and work.

You can also share journeys with your colleagues by carpooling.

### **As an employee of an insurance group, what types of environmental actions 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

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

# Social, societal and environmental responsibility

## Promoting responsible purchasing

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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

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

- With less environmental impact: promoting short circuits, eco-design, energy savings, preserving biodiversity, recycling channels, etc.
- With less social and societal impact: service providers who make sure to respect human rights, working conditions, health and safety of people, to ensure gender diversity, to boost local economies, etc.
- With less economic impact: ensure that the purchasing decisions taken also take into account an overall cost logic in relation to the product/service life cycle.

### Covéa's commitments

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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 supplier:

- 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 set up a global supplier risk assessment and control system.

### Appropriate behaviours

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- Ensuring the usefulness of the purchase: « buy less but buy better » ;
- Adopting an overall long-term cost approach ;

- Giving preference to «national» ;
- Giving preference to suppliers who are committed to CSR.

## Behaviours to be avoided/prohibited

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

## Case studies

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### **I need to order office supplies for my management, 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, my historical supplier and an SME.**

#### **How can 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

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- Manager ;
- Purchasing performance and strategy department.

# Customer protection

## Protecting the interests of customers and providing them with appropriate advice

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In accordance with the regulations, insurers have an obligation to inform and advise their customers. 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.

### Illustrations

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The identification, protection and analysis of the customer need mainly include :

- 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 ;
- Providing clear and fair pre-contractual and contractual information ;
- Providing advice consistent with the customer's situation, needs and objectives ;
- Allowing termination of the contract under the conditions provided for by law.

### Covéa's commitments

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In this context, the Covéa Group ensures that its customers are protected throughout the contractual relationship. This is reflected in an understandable and transparent communication about the product offered.

### Appropriate behaviours

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- Listening to and questioning the customers about their situation, knowledge and experience with insurance products by making them specify their objectives, expectations and needs ;
- Providing fair information to the customers and ensure that they understand it ;
- Proposing and advising on products and services suited to the customers' profile and in accordance with their interests ;
- Ensuring that products and services are presented clearly and accurately in accordance 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.

## Behaviours to be avoided/prohibited

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- Offering a product to a customer by giving them inaccurate information or failing to disclose important information ;
- Advising customers to buy a product that does not meet their needs to meet 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 when the customer meets all the conditions.

## Case studies

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**A customer consults me to request the termination of her policy. She maintains her request despite my explanation of the benefits of her policy. Can I object to her request so as not to lose this customer, although she meets all the conditions to take advantage of it ?**

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 consults me to take out a savings contract. What is the right approach ?**

For a long-term investment, particular care must be taken to ensure that the advice given is appropriate for the customer's age, objectives 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. This may lead to not pursuing the commercial approach.

## Contact person

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- Manager.

## Identifying and handling customer complaints

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A complaint is the expression of a dissatisfaction clearly expressed by the customer, through all channels, regarding the insurance policy for personal or professional risks. The handling of customer complaints must be efficient, equal and harmonised. The regulations in this area provide a precise framework.

### Illustrations

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- Simplified access to the complaints handling system ;
- Acknowledgement of receipt of the complaint within 10 days of receipt ;
- Clear and transparent information on how complaints are handled ;
- A definitive answer within two months.

### Covéa's commitments

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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

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- 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 ;
- Respecting the deadlines for handling complaints.

### Behaviours to be avoided/prohibited

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



## Case studies

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**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 competent 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

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- Manager.

# Customer protection

## Protecting customer data

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In accordance with the regulations, 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

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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 :

- Commercial prospecting ;
- Contract management ;
- Claims management, etc.

### Covéa's commitments

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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

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- 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, ask for advice and assistance from the data protection department (DPO department) ;
- Alert your management and the Data Protection Officer in case of suspected hacking and data leakage.

## Behaviours to be avoided/prohibited

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- Disclosing information about a customer ;
- Not respecting a customer's right to object to commercial prospecting ;
- Collecting customer data on personal and/or unsecured media (USB key, mobile phone, etc.) ;
- Objecting to a request for the right of access to personal data ;
- Entering sensitive information in free-entry fields, or using inappropriate terms.

## Case studies

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**A friend has just opened an IT services company. He asks me to send him the list of my customers' phone numbers so that he can prospect them. What should I do ?**

Our customers' phone numbers are personal data. Under no circumstances should they be passed on to anyone outside the Group.

**During an interview, a customer gives me information about her health.**

**What should I enter in the customer record ?**

You should not enter any information about the customer's health data in a free-entry field. Health data are sensitive. The information must be formulated in the most relevant way possible, in relation to the contractual relationship.

## Contact persons

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- Manager ;
- Data Protection Officer (DPO), where applicable the data department).

## Corruption prevention

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Corruption is an act by which a person vested with a specific public or private function seeks or accepts a gift, offer or promise with a view to performing, delaying or omitting to perform an act that falls, directly or indirectly, within the scope of his/her duties.

### Illustrations

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- 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

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

No Covéa employee shall 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 his/her superiors in order to take all appropriate measures to put an end to the situation.

In accordance with the Sapin II law of December 9, 2016, Covéa has set up a system to prevent and combat corruption, which is based, inter alia, on an Anti-corruption code of conduct, a corruption risk map, training for exposed personnel, rules governing gifts and invitations, and a whistleblowing system that allows situations contrary to the Code of Conduct to be reported in complete confidentiality.

### Appropriate behaviours

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- Immediately refusing any gift that might compromise the independent judgement ;
- Asking your manager if you have any doubts about the behaviour of a third party that may be contrary to our anti-corruption policy ;
- Declaring all gifts received or sent using the online form available on the intranet and invitations above the €150 threshold ;
- Ensuring that any gifts or entertainment we offer are appropriate and consistent with our Anti-corruption code of conduct ;
- Providing our business partners with the Gifts and Entertainment Guide for third parties.

## Behaviours to be avoided/prohibited

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- Promising, offering or accepting an advantage that may influence decision-making;
- Communicating 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;
- Accepting multiple tokens of hospitality of significant value from the same third party that may call his/her integrity into question.

## Case studies

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**A good customer asks me for my home address to have a «surprise» delivered at the end of the year. How should I react ?**

You should decline to disclose your address because sending business gifts to employees' homes is strictly prohibited by the Anti-corruption 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 him in exchange for confidential information.

## Contact persons

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- Manager ;
- Human Resources Manager (HRM) ;
- Whistleblowing system (see dedicated paragraph in the charter).

*To find out more:*

*Consult the Covéa Anti-corruption code of conduct (available on the intranet and at [www.covea.eu](http://www.covea.eu)).*

## Preventing conflicts of interest

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Conflict of interest refers to any situation where 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 his/her friends or family.

### Illustrations

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- 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.

### Covéa's commitments

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

It encourages employees to disclose any ties of interest that could lead to a conflict of interest in the performance of 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 could lead to a conflict of interest should be reported to your manager, HRM or the Compliance manager.

### Appropriate behaviours

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- 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 ;
- Informing management in the event of a potential or actual conflict of interest that could affect a decision and withdrawing from the decision-making process ;
- Complying with the recruitment procedures defined by the Group ;
- Declaring mandates held outside the Group.

## Behaviours to be avoided/prohibited

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- Concealing potential ties of interest ;
- Participating in the decision-making process in cases where their discretion may be impaired by personal considerations or power ;
- Offering or granting an advantage to a third party in order to induce him/her to do something or to omit to do something ;
- Favouring a friend or relative in a call for tenders.

## Case studies

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

Vous pouvez recommander une personne de votre famille. Dans ce cas, vous devez impérativement vous dégager de tout processus de décision et respecter les procédures internes.

**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 is a situation that can give rise to conflicts of interest. Indeed, given the link of interest between you and your friend or relative, your judgement may be impaired and challenged. Report this situation to your supervisor, and remove yourself from any decision making on this matter.

## Contact persons

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- Manager ;
- Human Resources Manager (HRM) ;
- Compliance Department ;
- Whistleblowing system (see dedicated paragraph in the charter).

*To find out more:*

*Consult the Covéa Anti-corruption code of conduct (available on the intranet and at [www.covea.eu](http://www.covea.eu)).*

## Fighting internal and external fraud

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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

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

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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.

Finally, the Group raises employee awareness of the practices to be followed and the impact of such fraudulent acts in order to avoid them. In order to strengthen this fight, the whistleblowing system makes it possible for employees to report any suspicion of fraud observed in the course of their duties.

### Appropriate behaviours

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- Remaining vigilant about the risk of fraud in daily business practice ;
- Complying with the procedures put in place by the Group, in particular the charter for the use of Information Systems ;
- Reporting any suspicion of internal or external fraud ;
- Not acting in a hurry and taking the time to contact the manager in the event of unusual requests, especially from the outside ;
- Keeping in mind that all goods, even those of little value, made available by the Group, or documents, are the property of Covéa.



## Behaviours to be avoided/prohibited

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- Using the Group's resources in a personal capacity (equipment, information, etc.) ;
- Falsifying official Group documents ;
- Making false declarations on expense reports ;
- Making a false declaration of working hours (badge fraud) ;
- Managing one's own contract, 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

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### **When managing a claim, an acquaintance asks me to manage his 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 pretending to be a Managing Director. He asked me to transfer a large sum of money, urgently, to an account number he 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

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- Manager ;
- Human Resources Manager (HRM) ;
- Whistleblowing system (see dedicated paragraph in the charter) ;
- User support in the event of receipt of a suspicious email or [sos-spam@covea.fr](mailto:sos-spam@covea.fr).

## Acting ethically towards external stakeholders

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Relationships with our external stakeholders must be guided by mutual respect. Ethical business conduct involves taking action while ensuring integrity, honesty and respect for stakeholders.

### Illustrations

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Conducting business fairly means :

- Making informed decisions ;
- Being transparent, honest and open with all stakeholders, especially during tenders ;
- Keeping commitments ;
- Not denigrating or discrediting competitors.

### Covéa's commitments

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The Covéa Group is committed to being vigilant about the quality of its relations with its stakeholders. The Group adheres to the principle of free competition and undertakes to create honest and fair relations with its customers, suppliers and subcontractors. All legitimate and necessary information regarding the market and the Group's competitors is obtained by transparent and appropriate means. The Group does not engage in dishonest, illegal or unethical activities.

### Appropriate behaviours

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- Communiquer avec honnêteté sur nos produits et services. La comparaison de ces derniers avec ceux de la concurrence doit être équilibrée, exacte et vérifiable ;
- Dans les relations avec les fournisseurs et sous-traitants, se comporter de façon loyale, transparente.

## Behaviours to be avoided/prohibited

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- Using information about a subcontractor or supplier for malicious purposes because the subcontractor or supplier has failed to fulfil its contractual obligations;
- Entering into a subcontracting agreement with a company that does not respect human rights because their services are cheaper than the competition.

## Case studies

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**I notice that a subcontractor has not fulfilled his contractual obligations properly. To warn other companies about its poor work performance, I'm thinking of posting a warning message on social media. Can I do it ?**

Even if a subcontractor has not fulfilled his contractual obligations properly, the legal means available should be used, without denigrating the subcontractor.

**When buying a service, a bidder I know contacts me to obtain information about the Group. What should I do in order to respond more appropriately to the call for tenders ?**

You must not give any information to this person to preserve fairness among bidders.

## Contact person

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- Manager.

## Combating money laundering and terrorist financing

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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. In accordance with the regulations, insurers are subject to due diligence obligations to combat money laundering and terrorist financing.

### Illustrations

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- 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), etc.

### Covéa's commitments

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The Group is committed to the fight against 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 appearing on official lists is also applied.

### Appropriate behaviours

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- Complying with the anti-money laundering and counter-terrorist financing procedures put in place by Covéa ;
- Attaching great importance to customer knowledge at all stages of the contractual relationship ;
- Remaining alert to unusual, complex transactions without documentation from the customer ;
- If in doubt about an unusual transaction, immediately contacting the Tracfin correspondent and reporting officer ;
- Regularly attending AML-TF training.

## Behaviours to be avoided/prohibited

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- Participating in, advising on and facilitating any investment or concealment of funds ;
- Disclosing to a client that he/she is the subject of anti-money laundering suspicions or disclosing it 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

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**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 this information does not enable you to remove the 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

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- Manager ;
- Tracfin correspondent and reporting officer.

*To find out more:*

*See the «Compliance / AML-TF» page on the intranet.*

## Complying with market abuse rules

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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.

They are sanctioned by the French Financial Markets Authority (Autorité des marchés financier - AMF).

Market abuse rules aim to ensure market integrity and preserve investor confidence.

### Illustrations

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- 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

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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 maintain its confidentiality 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 contrary to the regulations (criminal sanction, AMF sanction) and the Group's rules of conduct.

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

### Appropriate behaviours

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- 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 that are not included in the insider list ;
- Refraining from disclosing to a third party the purchase or sale of the financial instrument in question ;
- Complying with the internal procedures and restrictions that apply to the Group's financial operations and transactions.

## Behaviours to be avoided/prohibited

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- 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

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**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 strong impact on the value of these companies' shares. He advises me to be ready to buy shares in one of them. Can I do this ?**

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. Such use constitutes market abuse and, more specifically, insider trading. These illegal practices are punishable by law.

**A friend of mine informed me of the loss of his company's biggest customer, because he knows that Covéa is a shareholder in this company. At the same time, he also told 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.

## Interlocuteurs

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- Manager ;
- Compliance Department.

# Protection of the Group's assets

## Ensuring the protection and confidentiality of Group data

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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 according to the regulations, rules and processes in force, particularly in terms of business secrecy.

The protection of the Group's data implies that everyone uses it fairly and in accordance with their obligation 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

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

### Covéa's commitments

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The Covéa Group is committed to complying with data protection regulations. It also undertakes to make each user aware of the protection of the Group's data, those of its members and customers, and those of other stakeholders. To this end, it has drawn up a charter for the use of Information System, which is appended to the internal regulations, and is rolling out an extensive programme to raise awareness of personal data protection among its employees.

### Appropriate behaviours

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- Ensuring the legitimacy of a third party to receive data before any communication ;
- 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 ;
- Alerting in the event of an anomaly (disclosure of sensitive or confidential information) ;
- Not keeping business data when leaving the Group.



## Behaviours to be avoided/prohibited

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- Making public any internal Group document without authorisation ;
- Keeping business data after leaving the Group ;
- Disclosing the Group's internal directory or organisation chart to a third party ;
- Disclosing information about the Group over the phone without being certain of the caller's identity.

## Case studies

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**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. Can I do it ?**

You should avoid working on this type of document on public transport. It is recommended to 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 him my document by e-mail ?**

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

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- Manager;
- Data Protection Officer (DPO), where applicable the DPO department.

# Protection of the Group's assets

## Ensuring the security of the Group's Information Systems and equipment

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The Information Systems (IS) correspond to all the company's resources enabling information management: hardware, software, application, data. IS security is crucial to the Group's business continuity. These systems are exposed to numerous vulnerabilities due in particular to the multiplication of exchanges and networks and the opening of 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 their confidentiality, by controlling and monitoring their use, their integrity, their availability, and the traceability of the actions undertaken on the IS.

### Illustrations

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

### Covéa's commitments

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The Covéa Group has adopted a charter for the use of the Information Systems, which defines the rights and duties of users in the context of the use of IT tools provided to them. This charter recalls the applicable legislation and in particular mentions 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 (GISSP) 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

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- Respecting the integrity of the configurations ;
- Saving business documents to shared folders ;
- Securing any transmission of professional information outside the Group through appropriate measures.

## Behaviours to be avoided/prohibited

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- Using the same password for different applications ;
- Giving your password to a colleague to help him/her out ;
- Not complying with the Information Systems security policy.

## Case studies

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### **I'm retiring soon. I want to keep the work computer because I don't have one. Is that possible ?**

No, because your computer is a resource belonging to Covéa. It was entrusted to you as part of your professional activity. When you leave your position, you must return all the equipment and documents provided by Covéa.

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

The computer provided by the Covéa Group is equipment that belongs to it. Each employee must use the equipment provided while respecting the integrity of the configurations provided. In such a case, it is possible to make an IT request.

## Contact persons

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

*For more information, visit the intranet :*

- *Covéa Group's Charter for the Use of Information Systems.*
- *Global Information Systems Security Policy*

# Protection of the Group's assets

## Communicating responsibly

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Communication with third parties is binding on the Covéa Group. Any communication 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 to be attentive to messages sent to the outside world.

### Illustrations

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

### Covéa's commitments

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The Covéa Group is committed to ensuring that each employee is aware of the potential impact of his or her 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 communication, only duly authorized 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

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- Being vigilant and discerning with regard to any external solicitation concerning the Covéa Group and its organisation;
- Informing the line manager and the External Communication 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

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- 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 Group information to the outside world.

## Case studies

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**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 management 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 «Digitalise your box» ambassador programme.

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

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

## Contact persons

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- Manager ;
- External communication: [presse@covea.fr](mailto:presse@covea.fr).

# Whistleblowing system

Covéa's whistleblowing system contributes to the culture of integrity by enabling the detection of malfunctions in the areas covered by the law.

It allows any Group employee or third party to report serious matters, including breaches of the law or regulations, particularly in the following areas:

- Prevention of corruption and fraud;
- Occupational health and safety;
- Harassment and discrimination;
- Serious environmental damage.

The use of this system is optional and confidential. Employees can send their report to their direct or indirect line manager, their HRM or to staff representatives.

Covéa undertakes to ensure that no disciplinary measure or sanction will be taken against an employee who has made use of the 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 and legal proceedings.

To this end, employees have access to the platform : <https://report.whistleb.com/fr/covea>.

Third parties can use the <https://report.whistleb.com/fr/covea-vigilance> platform for this purpose.

## FAQ

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### What is a whistleblower ?

It is a natural person who reports facts that he or she has personally observed, in a selfless manner (i.e. in the general interest) and in good faith, which constitute a situation or behaviour that is potentially illegal or illicit or detrimental to the general interest.

### How am I protected ?

The system ensures the confidentiality of the identity of the whistleblower, the persons concerned and the information gathered at all stages of the handling of the whistleblowing. This confidentiality is guaranteed by the use of encrypted exchanges on a dedicated platform and by a limited number of employees dealing with alerts. These employees are subject to a strict obligation of confidentiality. Disclosing the identity of the whistleblower is punishable by 2 years imprisonment and a fine of €30,000.

### Can I make an anonymous alert ?

In principle, Covéa wishes to avoid receiving anonymous alerts in order to avoid slanderous denunciations and to facilitate the investigation of the alert and the protection of the whistleblower.

### What facts or behaviours can I report ?

The scope of the system is limited to the serious facts covered by the legislation, in particular:

- In the economic and financial field: potential criminal offences such as fraud or swindling, corruption, misuse of corporate assets and violations of the Anti-corruption code of conduct.
- In the area of health, personal safety or the environment: discrimination, harassment, forced labour, a major leak of personal data, environmental pollution.

### What happens next?

The whistleblower receives an acknowledgement of receipt immediately. The alert is received by the Compliance manager, who is the Group's alert officer. Once the admissibility of the alert has been confirmed, a confidential internal investigation is launched to verify the facts reported.



A PURPOSEFUL  
MUTUAL  
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