



France scope,  
review of the 2024  
financial year

# Our 2025 **CSR** **commitments**

Protecting innovation to imagine  
a sustainable and peaceful future.

## Editorial



As a generalist insurance and reinsurance consulting and brokerage group, Diot-Siaci bears a major responsibility: preserving the essential balance between companies, individuals, and their environment.

More than a commitment, it is a conviction of our management: to protect, anticipate and support the transformation of the world with rigor and responsibility.

Our Horizon 2029 strategic plan translates this ambition into actions. It is based on an integrated vision where economic performance, social engagement, and environmental impact come together to build a sustainable future. This commitment is reflected in:

- strong social responsibility, represented by robust policies in favor of diversity, inclusion and well-being at work.
- strategic support of our clients, to help them grow while transitioning towards more sustainable business models.
- ethical and responsible approach, integrated into each of our solutions, to combine risk management with positive impact on the society.

Because tomorrow's challenges must be addressed today, Diot-Siaci takes a long-term approach, led by a committed team.

Throughout this document, discover the initiatives that make our group a key stakeholder in sustainable progress.

**Cédric Charpentier,**  
Managing Director,  
Diot-Siaci Group

**Myriam El Khomri,**  
Director of HR Consulting division,  
Director of CSR Strategy

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# Our Group

We are a leading generalist group in France and Europe, providing insurance and reinsurance consulting and brokerage services in Asia, the Middle East and Africa, and worldwide through the Diot-Siaci Global Partners network.

We design and develop customized, innovative solutions for our clients, who include Large and Mid-cap companies, SMEs-SMIs and professionals, in personal insurance and property & liability insurance, in line with our CSR commitments.

**600**

International programs

**30+**

Specialists managing the network from Paris

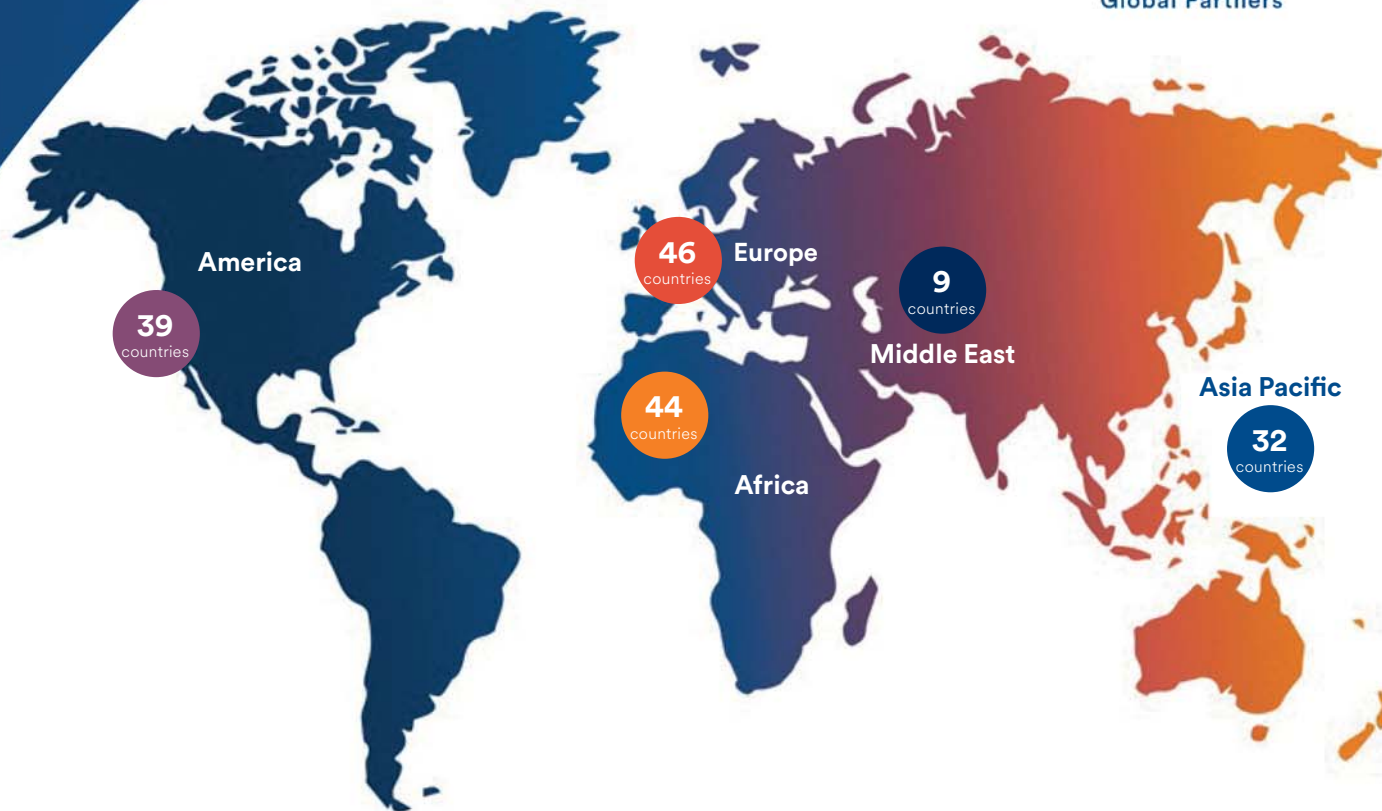
**170**

Countries of operations

**40%**

Employees abroad

## A strong global network



## A comprehensive offering, structured around two pillars

### PROTECTING AND RETAINING EMPLOYEES

Health, Life & Disability, retirement  
HR consulting  
International mobility

### PROTECTING ASSETS AND LIABILITIES

Industrial and commercial risks  
Credit insurance, bonds, financing and political risks  
Marine & Cargo, construction, motor fleet and specialties  
Captive management and reinsurance



# Group turnover for 2024\*

**INTERNATIONAL: €369M**

(Europe, Middle East, Africa, Asia, marine insurance and specialties)

**DSCS: €274M**

(Industrial, commercial and professional risks and reinsurance)

**PSC: €194M**

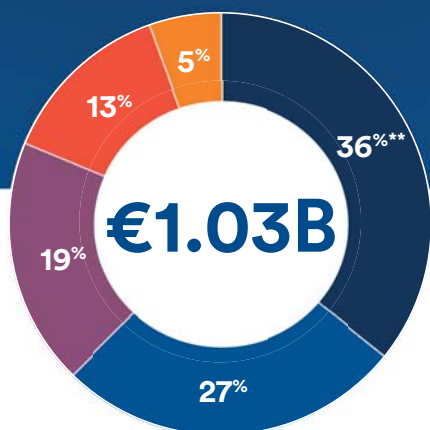
(HR consulting, Employee Benefits)

**MSH: €136M**

(International Mobility)

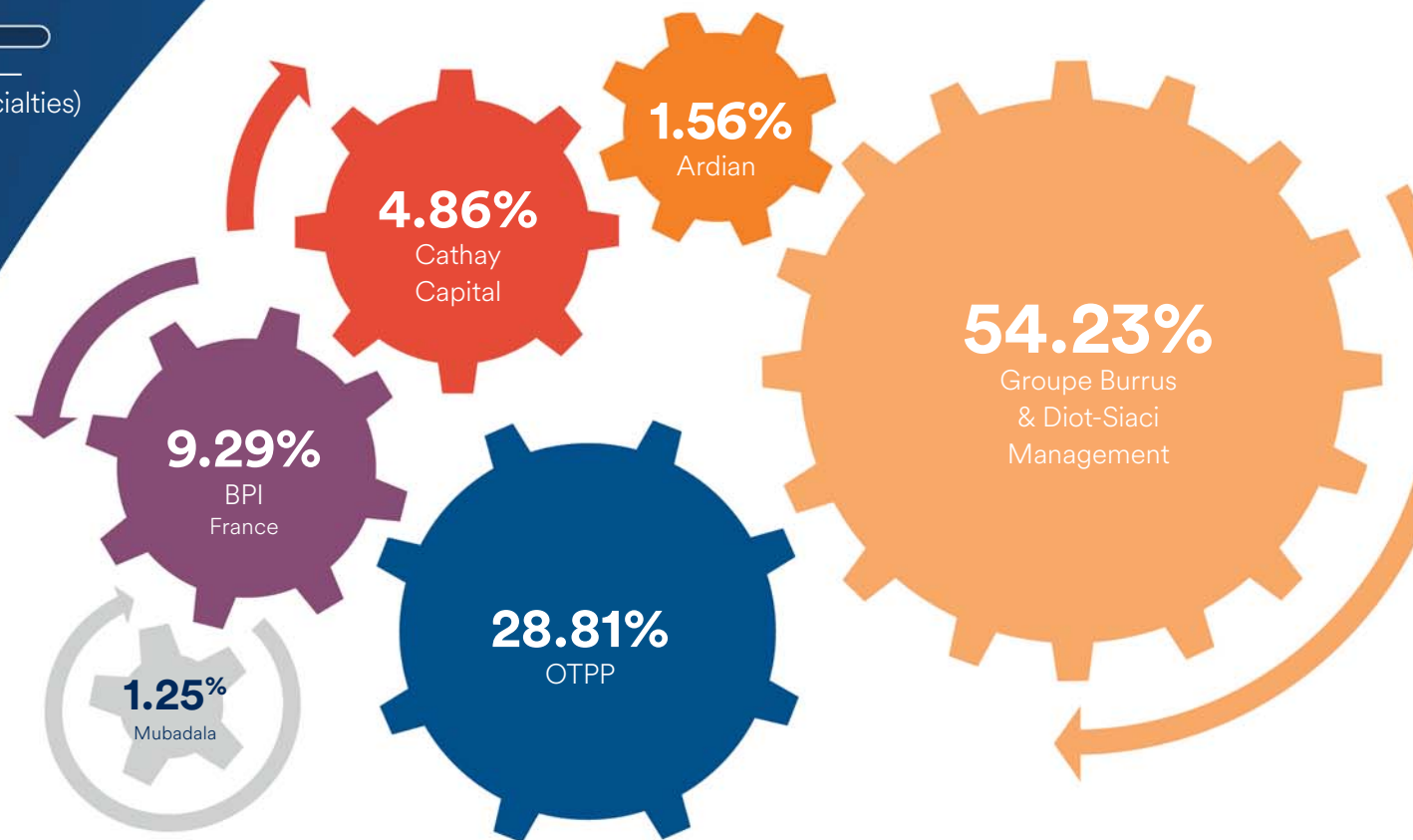
**DSTF: €57M**

(Credit Insurance, Bonds, Financing and Political risks)



\* 2024 total gross restated turnover distribution per Business Unit  
 \*\*The international turnover includes the activity of the "International" Business Unit and part of the activity of MSH (i.e. more than 44% of the total turnover outside France)

## Unique capital structure



## 2024 key figures

**98%**  
 of the portfolio  
 concerning corporate risks  
 (10,000+ Large and Mid-cap client companies)

**5M**  
 insured members  
 in France and worldwide

**600**  
 international programs  
 managed from Paris

**Top 1.000**  
 a leading group in the  
 top 1,000 French companies

# Our CSR strategy

CSR is one of the pillars of our Horizon 2029 strategic plan.

Our involvement in CSR is nurtured by the strong values shared by the men and women who make up our Group and our mission statement.

CSR governance is therefore integrated into our Executive Committee and entrusted to Myriam El Khomri, Director of CSR Strategy and Director of the HR Consulting unit.

This positioning underscores the importance of CSR issues and responds to employees' expectations and interest in the topic, as expressed in the social barometer.



## AREA 1 THE EMPLOYEES

To be a responsible, inclusive and caring employer to protect our employees,

To take care of our employees' mental and physical health by implementing the Care management,

To support the Group Diversity and Inclusion policy.



## AREA 2 THE SOCIETY

To be a socially responsible player,

To support employees with chronic diseases,

To structure partnerships in favor of a social cause.



## AREA 3 OUR CLIENTS AND SUPPLIERS

To help clients: advising our clients on their transition to sustainable growth and providing them with solutions suited to their needs.

Ethical and responsible behavior: maintaining rigorous ethical standards.

Regulated profession: acting in accordance with the requirements of a regulated profession.

Social and environmental commitments: including our suppliers and partners in our social and environmental commitments.



## AREA 4 THE ENVIRONMENT

To reduce the environmental impact of our activities and preserve biodiversity.

# Our support for the United Nations Global Compact

## The 10 principles of the United Nations Global Compact



### HUMAN RIGHTS

1. Businesses should support and respect the protection of internationally proclaimed human rights; and
2. Make sure that they are not complicit in human rights abuses.



### LABOR

3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
4. The elimination of all forms of forced and compulsory labor.
5. The effective abolition of child labor; and
6. The elimination of discrimination in respect of employment and occupation.



### ENVIRONMENT

7. Businesses should support a precautionary approach to environmental challenges.
8. Undertake initiatives to promote greater environmental responsibility; and
9. Encourage the development and diffusion of environmentally friendly technologies.



### ANTI-CORRUPTION

10. Businesses should work against corruption in all its forms, including extortion and bribery.

## 17 Sustainable Development Goals (SDGs)

As a member of the Global Compact<sup>1</sup>, Diot-Siaci continually strives to integrate the 10 principles into its Corporate Social Responsibility strategy and, more broadly, into its decisions and activities, while supporting the achievement of the 17 SDGs



<sup>1</sup>UN Global Compact Network France

WE SUPPORT THE GLOBAL COMPACT



# Our social responsibility



Diot-Siaci's HR and CSR policy plays a key role in attracting and retaining talent, as well as in developing employee skills.

By offering an inclusive and caring work environment, supported by initiatives such as the Care Management, the company guarantees the well-being of its employees and strengthens their engagement.

Diversity and inclusion are also drivers of collective performance and boost innovation. By investing in skills development and providing pleasant working conditions, we support each employee's career path in a way that aligns with their personal circumstances, enhancing their marketability.

This commitment reflects a strong ambition: to make the company a place where everyone can thrive and contribute fully to collective success.

**Sylvie Rolland,**  
Head of Human Resources





# A responsible and attentive employer

## WHICH SUPPORTS AND RESPECTS THE UNIVERSAL DECLARATION OF HUMAN RIGHTS

Through our HR & CSR policy and our membership of the United Nations Global Compact, we support and respect human rights as recognized by the Universal Declaration of Human Rights, the fundamental conventions of the International Labour Organization (ILO), and all other applicable international, national, and local regulation.

Our Group and all our subsidiaries categorically reject any complicity in the violation of these rights, wherever it may occur.

We prohibit child labor and forced labor, and do not cooperate with parties that do not respect these fundamental principles.

## ALWAYS ATTENTIVE TO THE WORKING TIME AND REMUNERATION OF ITS EMPLOYEES

Our Group and our subsidiaries undertake to apply all applicable local labor law provisions, wherever we operate, in particular those in respect of legal working hours and minimum wages.

## AND WHICH MAINTAINS ACTIVE SOCIAL DIALOG

We guarantee freedom of association and engage in ongoing, constructive dialog with all the Group's employee representative bodies.

This dialog takes place:

- During monthly meetings of the Social and Economic Committee (SEC);
- And regularly at negotiation meetings with union representatives, at the end of which agreements may be signed and/or approved.

In this way, we comply with our legal obligations and strive to maintain a healthy social climate.





# Health, safety and well-being at work

We are committed to providing all of our employees with an attractive, pleasant environment and working conditions that promote their well-being while meeting the Group's CSR commitments. To do this, we rely in particular on the social barometer to measure the commitment and well-being of our employees, taking into account changes within the group.

This enables us to better understand our employees' expectations and to adapt policies and initiatives to continuously improve working conditions and enhance our teams' well-being.

In addition to this monitoring, we propose various initiatives, such as continuous training programs, health prevention actions and team-building activities, in order to support each employee's professional and personal development.

2

## OCCUPATIONAL HEALTH NURSES (OHNs)

on our two main sites in the Paris region

4

## DIVERSITY & INCLUSION ESCAPE ROOM

Nearly 70 participants

3

Monitor health, provide care, administer vaccines and raise awareness of public health issues

## QLWC WEEK CONFERENCES

328

## EMPLOYEES TRAINED

International workplace first aid, fire/lead guide and tail-end, fire extinguisher handling, electrical accreditation

+ 20 pts vs 2023

78%

## PARTICIPATION IN THE SOCIAL BAROMETER

This social barometer measures our employees' commitment and well-being and takes into account their various expectations and suggestions



### In 2024, Diot-Siaci, in partnership with Rosaly, launched the Budget'Santé card.

This innovative solution allows its users to benefit from an advance payment for their medical expenses, helping remove financial obstacles associated with healthcare and contributing to the well-being of employees, which is key to corporate social responsibility. It supports our clients in promoting an inclusive health policy, strengthening their commitment to quality of life at work and, consequently, their performance and attractiveness.



Our social responsibility

# Diversity, inclusion and equal opportunities



Diversity and inclusion are drivers of attractiveness, performance and growth. Diot-Siaci translates this commitment into concrete actions in favor of its employees, individuals facing barriers to employment or in difficulty, and local communities.

Ongoing training, strategic partnerships, support for associations and measures to keep people in work or help them return to work enable to promote equal opportunities and value each individual's potential.

By fostering an inclusive environment, the company attracts and retains diverse talent while stimulating innovation. These initiatives are at the heart of our HR and CSR priorities.

**Stéphanie Boulé,**

Director of HR and CSR Development



Our social responsibility

# Diversity, inclusion and equal opportunities

↙ 40 nationalities and  
60 languages spoken

Over  
**7.500**  
**EMPLOYEES**  
including over 3,500 abroad

**247**  
**INTERNAL**  
**MOBILITIES**  
and career developments

↗ with  
**96.46%**  
attendance rate in France

**4**

**SPECIALIZED**  
**JOB FAIRS**  
dedicated to disabled  
people

**109**

**NEW WORK-STUDY**  
**TRAINEES RECRUITED**  
for a total of 151 work-study  
trainees in post

Indicator  
monitored by  
the ExCom  
↘

**26.5%**

**OF EMPLOYEES**  
**OVER 50**  
in the 2024 workforce,  
with 21% of training hours  
dedicated to them

**86/100**

**PROFESSIONAL**  
**EQUALITY SCORE**  
for 2025 based on  
2024 data

↘ Establishment  
of a disability  
officer

**4.21%**

**OF EMPLOYEES**  
**WITH A**  
**DISABILITY**

↙ ↘ Indicators monitored  
by the ExCom

**59%**

**OF WOMEN MANAGERS**  
and a ratio in the group  
of 33% men to 67% women

**3**

**OFFICERS DEDICATED**  
to combating psychological,  
sexual and discriminatory  
harassment and sexist  
behavior

↘ support  
upskilling

**17%**

**OF EMPLOYEES**  
**UNDER 30**  
in the 2024 workforce,  
with 14% of training hours  
dedicated to them



# An inclusive and committed employer

## OUR COMMITMENTS IN SUPPORT OF DIVERSITY, INCLUSION AND EQUAL OPPORTUNITIES

- Diversity Charter
- NQT scheme (“Nos Quartiers ont du Talent” or Our Neighborhoods Have Talent)
- AMUP (“Assure Moi Un Projet professionnel”, a scheme to encourage employment in insurance)  
operational readiness for employment (groups or individuals),  
professional retraining for people with disabilities.

You can become  
a mentor at any time ↘

1

**EMPLOYEE**  
recruited through  
the AMUP



27

**NQT MENTORS**  
Nos Quartiers ont  
du Talent

80

**EMPLOYEES**  
participated in the Diversity  
Fresco initiative



## WE REGULARLY STRENGTHEN OUR INCLUSION AND DISABILITY POLICY AND ARE COMMITTED TO SUPPORTING OUR EMPLOYEES WITH DISABILITIES

- Personalized support with an HR Disability Officer and a dedicated HR Officer available to assist them.
- Participating in dedicated recruitment fairs and opening up job vacancies to persons with disabilities.
- Assistance with the preparation of Disability Recognition applications.
- Training of recruitment managers and teams working with employees with disabilities.
- Partnerships with various ESATs.
- Hosting of trainees with disabilities to make it easier for them to retrain or re-enter the job market.



### We support our clients in their social protection strategy (health, life & disability and retirement) in France and abroad.

Our goal: The company's performance through the optimization of its human capital. We act on the levers of remuneration, talent engagement, HR communication and training. We also guide organizations' social transformations.



# Skills development and career management

We position ourselves as a **learning organization**, offering training courses tailored to the different profiles of our diverse teams, to develop their skills at their own pace.

These personalized training courses combine a variety of teaching methods – face-to-face, e-learning or hybrid – to meet individual and collective needs, as well as business challenges.

**2,579**

## EMPLOYEES TRAINED

Managerial: 67%;  
Non-managerial: 33%  
Women: 68%;  
Men: 32%

**55.901**

## HOURS OF TRAINING

or 22 hours on average  
per employee

**90%**

## OF ANNUAL PERFORMANCE REVIEWS COMPLETED

### A LEARNING COMPANY



#### INDIVIDUAL TRAINING PROGRAMS

16 coaching courses

1 Accreditation  
of Prior Experiential  
Learning (APEL)



#### COLLECTIVE TRAINING PROGRAMS

**Master's degree** in Insurance Management  
> 8 employees

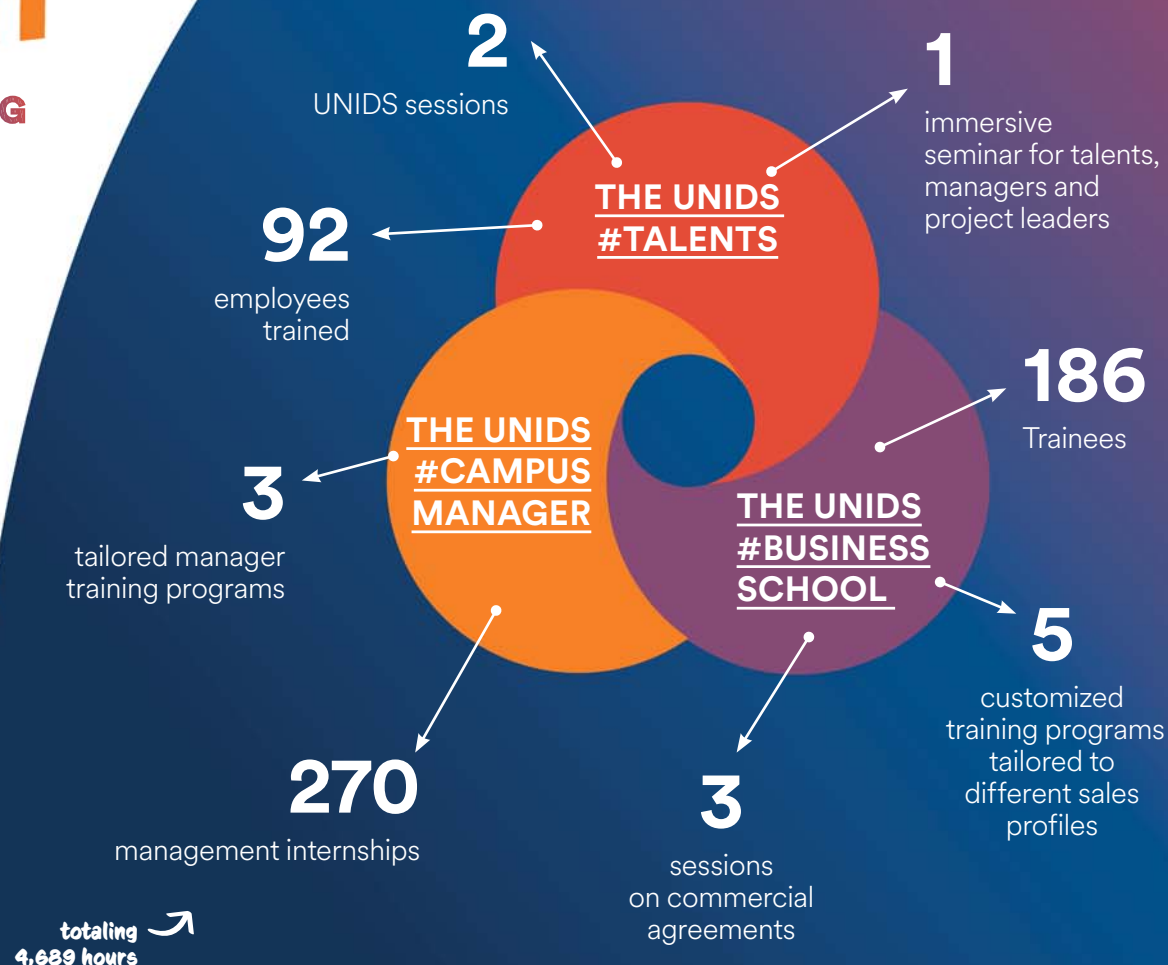
**3rd class of the Diploma** in Insurance  
Consultancy and Underwriting  
> 11 employees

**Certificate:** Mastering the challenges  
of client relationship  
> 4 employees




The Diot-Siaci University (UNIDS), which brings together the Group's talents, managers and sales staff, aims to retain employees, develop the corporate culture and share Diot-Siaci's overall strategy.

### 3 TAILORED THEMED OPTIONS



# Societal Commitment

Through Area 2 of our CSR strategy, our Diot-Siaci community demonstrates its social commitment on a daily basis, by participating in various major initiatives such as:

- Signing of the **#workingwithcancer** charter, which aims to support those living and working with cancer around the world. 
- **Sponsorship of the Institut Gustave Roussy (IGR)**, whose central goal is to improve medical care and the quality of life for individuals with cancer.
- Collections for Les Restaurants du Cœur.
- Continuation of the partnership with **MicroDON** (salary rounding).
- Solidarity runs/walks in support of associations (Adicare for cardiology research).

These concrete actions demonstrate Diot-Siaci's desire to make a positive contribution to society and to promote solidarity.'



## MICRODON

- **1,299** donors since launch in 2013
- **€102,699** donated by Diot-Siaci employees
- **€308,077** collected for 8 charities



## LES RESTOS DU CŒUR:

- **240 kg** of food and hygiene products collected
- **12 participating sites** in France



## LES FOULÉES DE L'ASSURANCES:

- Nearly **283 participants**
- **#1 in the TOP 3** during the digital challenge



## MOBILIZATION: PINK OCTOBER





# Our environmental initiatives



As environmental concerns become more pressing, it is imperative for companies to adopt sustainable practices.

Our commitment to the environment is based on a dual approach: supporting our clients in their transformation towards responsible growth, and reducing the ecological footprint of our activities while preserving biodiversity.

These objectives are achievable through the commitment and cooperation of all Diot-Siaci stakeholders. Together, we embed sustainability principles at the heart of our strategy, making each action a step towards a successful ecological transition. Our collective commitment illustrates our determination to build a more sustainable and peaceful future, to limit our impact on the environment.

**Elisabeth Rafael Barão,**  
Head of CSR Strategy and Projects



# Our environmental policy

Although our direct impact on the environment is limited, we recognize the importance of our role in combating climate change and preserving biodiversity. This is why we are integrating the principles of CSR by adopting the guidelines of the ISO 26000 standard.

We are committed to complying with applicable environmental laws and regulations in all countries in which we operate. As part of the CSRD implementation plan CSRD (Corporate Sustainability Reporting Directive), we are intensifying our efforts environmental responsibility principles into all our operations.

Our environmental policy is based on the following pillars:

- **Emissions reduction:** We identify and reduce our greenhouse gas emissions through energy optimization and the adoption of sustainable practices.
- **Sustainable resource management:** We reduce waste, promote recycling and procure responsibly.
- **Awareness and training:** We train our employees and communicate on our sustainability initiatives to strengthen a culture of environmental responsibility.
- **Helping our clients achieve sustainable growth:** For our clients, we design risk coverage solutions tailored to their sustainability challenges.
- **Preservation of biodiversity:** We support projects to restore natural habitats, thereby contributing to the protection of biodiversity.
- **Partnerships and engagement:** We work with our stakeholders to promote sustainable practices throughout our value chain.

160  
participants  
2

## CONFERENCES

The impact of climate change on the provision of insurance products

254

## EMPLOYEES PARTICIPATED IN THE CLIMATE FRESH WORKSHOP

## 2024 DIOT SIACI'S CARBON FOOTPRINT<sup>1</sup>

98% of GHG Protocol emissions are attributable to the following three categories:

73% inputs  
18% travel  
7% fixed assets

36,983

TONS OF CO<sub>2</sub>

Scope 1: 1,512 tCO<sub>2</sub>e  
Scope 2: 531 tCO<sub>2</sub>e  
Scope 3: 34,940 tCO<sub>2</sub>e

6,2 tCO<sub>2</sub>e per full-time equivalent (FTE)

## 1 UPDATE OF OUR CARBON FOOTPRINT

<sup>1</sup>2023 financial year  
GHG Protocol and ADEME  
methodology.  
Scope: UES DIOT SIACI  
France and 12 group sites  
worldwide



Our environmental initiatives

# More environmentally-friendly mobility

We prioritize premises located close to public transport to encourage soft mobility, reduce car use and facilitate our employees' daily commutes.

We have also undertaken an overhaul of our company car policy, aimed at reducing the carbon footprint associated with their use. At the same time, we have strengthened our travel policy by favoring eco-friendly alternatives (public transport, train, etc.) and limiting non-essential travel.

To complement our approach, we are establishing partnerships to provide our employees in the Île-de-France region with alternative transportation options, such as electric shuttles. In addition, bike spaces are available at most of our sites in France, strengthening our commitment to sustainable mobility and reducing our environmental impact.

61%

OF HYBRID AND  
ELECTRIC VEHICLES

1

TRAVEL POLICY  
STRENGTHENED



BICYCLE REPAIR  
WORKSHOPS  
in partnership with  
CycloCare

5,700Km  
TRAVELLED

456kg  
OF CO2 SAVED



thanks to the Caocao electric shuttle system  
offered to our employees in the Île-de-France region



Our environmental initiatives

# Sustainable consumption approach

As part of European Sustainable Development Week (ESDW), we offered webinars aimed at educating employees on environmental issues.

These events were designed to encourage concrete and informed action, reinforcing our commitment to sustainable practices within our Group. These sessions enabled our employees to:

- **Assess** their practices and identify areas for improvement in terms of eco-friendly actions in the office and when working remotely.
- **Discover** and share eco-friendly actions that can be integrated into their daily lives.
- **Understand** current climate and energy challenges and developments.

**SUPPORTING  
SOCIAL  
INCLUSION**



**This approach reinforces our commitment to responsible purchasing practices, which are key to our corporate strategy.**

We work with ESATs (organizations that help people with disabilities back into work), thereby supporting the social inclusion of these individuals. In addition, we work with our suppliers to optimize working conditions, including by adopting daytime schedules for maintenance staff, in order to improve their work-life balance.

## ENVIRONMENTALLY RESPONSIBLE WATER MANAGEMENT

We chose Castalie fountains, Social and Solidarity Economy (SSE) company an eco-friendly water solution, for our sites. We provide our employees, clients and guests with water dispensers connected to the water network, providing quality, micro-filtered water that is local and neutral in taste.

**With this system, we confirm our commitment to reducing our use of plastic.**



**73,400 LITERS**  
of Castalie water consumed



**1 FREE CUP**  
for each newcomer



**to limit the consumption of disposable containers**



**142,560 SINGLE-USE**  
50CL bottles avoided!



**16,530 KG**  
CO2-eq avoided!



**THE EQUIVALENT  
OF 110 ROUND TRIPS**  
Paris-Marseille saved

Our environmental initiatives

# Waste management

We raise awareness among our employees through simple eco-behaviors to adopt:

- **Sorting waste in dedicated areas**  
Adoption of selective sorting through voluntary drop-off at communal collection points.
- **Managing paper use by restricting printing to black and white and using both sides.**
- **Organizing “Sort, File, Toss” days as and when necessary**  
And especially when moving to another site, a clean-up session known as (“Trier, Archiver, Jeter” or “Sort, File, Toss”) is organized to sort and get rid of any unnecessary paper.
- **In partnership with Cy-clope, recycling cigarette butts**  
For several years now, we have been recycling cigarette butts from employees who smoke in partnership with Cy-Clopes.
- **Supporting the environmental approach, in partnership with GREENWISHES**  
The Equinox claims department in Clichy-la-Garenne collects, sorts and recycles waste, generating a more ethical corporate approach overall.



281,000  
cigarette butts



That's equal to

70.25 kg

cigarettes butts collected and recycled

which represents

140,500  
m<sup>3</sup>

water saved



100%

of the cigarette butts were recycled via this energy-saving initiative



2024  
ROUND-UP

THE EQUINOX CLAIMS DEPARTMENT IN CLICHY-LA-GARENNE COLLECTED AND RECYCLED

6,636  
KG OF PAPER AND  
CARDBOARD

908.5  
KG OF GLASS



69.44  
MWH OF ENERGY  
equivalent to the annual  
consumption of  
7 inhabitants

321  
M3 OF WATER  
equivalent to the annual  
consumption of  
6 inhabitants

0.69  
TONS OF CO2  
equivalent to 2,811 km  
in a small city car



Energy savings and CO2 equivalent impact achieved thanks to recycled products







Our environmental initiatives

# World Cleanup Day

## COMMITTED EMPLOYEES FOR A CLEANER PLANET!

For several years now, we have been taking part in this international event. In 2024, our employees once again took part in the 7<sup>th</sup> annual event in France and abroad.

More than just civic and community actions, these events are also an opportunity for dialog and interaction between colleagues, as well as with local residents who have warmly thanked us for our ongoing commitment over the past several years.

To complete the process, the event partner Cy-Clope recycled and recovered the cigarette butts collected during the event.

**184**  
**PARTICIPANTS**  
in France and abroad

**200**  
**KG OF WASTE**  
collected, including a considerable  
quantity of cigarette butts



Our environmental initiatives

# Our commitment to protect biodiversity

We are members of the Association Française des Entreprises pour l'Environnement (EPE) and the Act4nature International initiative.

As such, we are committed to continuing to integrate nature (environments, flora, fauna, ecosystems, interactions, genetic heritage, etc.) into our strategy and business model, and to taking concrete action to provide solutions for the conservation of biological diversity, its restauration, its sustainable exploitation and the equitable use of the benefits derived from it.

act4nature  
international

epe  
entreprises pour l'environnement



## DIOT-SIACI SUPPORTS THE FONDATION DE LA MER

In line with our maritime activities and strong international presence, we have chosen to support a project aimed at preserving marine biodiversity and in particular the conservation and restoration of Posidonia meadows in the Mediterranean Sea (Provence-Alpes-Côte d'Azur and Sardinia).

This partnership with the Fondation de la Mer enables us to:

- respond to the expectations of our Diot-Siaci employees, who are highly sensitive to the Group's environmental commitments and expect concrete actions to reduce our carbon footprint while protecting the planet;
- fulfill the commitments we made to act4nature international

FONDATION  
DE LA MER

# Our ethical and responsible client commitment



The various aspects of compliance and CSR are intrinsically linked and shape our Group's activities, not only through compliance with regulations but also through the adoption of ethical practices and behaviors.

Together, they lay the foundations for strong CSR, fostering transparent and sustainable business conduct.

By integrating these elements, we are strengthening our credibility and reputation among our employees, clients and service providers as part of our Horizon 2029 strategic plan.



**Inès de Bonneval,**  
Compliance Officer

Our ethical and responsible client commitment

# Code of conduct and professional ethics

Our code of conduct and professional ethics clearly defines acceptable and prohibited behaviors in the fight against corruption, conflicts of interest and influence peddling. It also covers all ethical rules to be followed, including a whistleblowing procedure and guidelines on practices involving gifts and invitations.

**To ensure that our commitments are met, everyone's involvement is essential.**

This is why we circulate the code of conduct to all our employees, in France and abroad, and have incorporated it into our Group's internal regulations.

This code ensures uniform compliance across all Diot-Siaci Group entities, while allowing local adaptations, subject to our approval.

1

## CONFLICT OF INTEREST UNIT

dedicated to conflicts  
of interest

Deal with potential  
conflicts of interest

99%

## OF EMPLOYEES

answered the self-declaration  
questionnaire

Agree to adhere  
to the Code of Conduct.  
Identify potential  
risk situations



## REGULAR REPORTS

submitted to the  
management



# Raising awareness and training in business ethics

## CORRUPTION

An effective culture of ethics requires a good understanding of the issues surrounding the day-to-day risks of corruption.

We provide all our employees with a mandatory e-learning course: "Sapin 2 Law - Anti-Corruption Law and Code of Conduct" to make improvements in the following areas:

### 1. Raising awareness

of the complexity of players and situations with respect to corruption, conflicts of interest and influence peddling.

### 2. Understanding

patterns of corruption.

### 3. Measuring

the risks incurred. This SAPIN 2 e-learning module is systematically included in the "new employee" pathway, making new employees aware of the subject as soon as they join the group.

88%

### OF EMPLOYEES

completed the "Sapin 2 Law" e-learning course



Additional training provided by a law firm and integrated into our managers' development program

## AML-CFT & INTERNATIONAL SANCTIONS

We continue to apply a zero-tolerance policy and strengthen our internal control system by being vigilant and focusing on 4 areas of action:

### 1. Training

all our employees in AML-CFT procedures and international sanctions.

### 2. Conducting

pre and post-transaction controls.

### 3. Checking

on all new business relationships using international sanctions lists.

### 4. Systematic check

during the recruitment phase to ensure the candidate is not subject to international sanctions.

Learn about best practice in the fight against money laundering, the financing of terrorism, and international sanctions.

88%

### OF EMPLOYEES

completed the mandatory "AML-CFT & International Sanctions" e-learning course



AML-CFT: combating money-laundering and the financing of terrorism

## FRAUD

In addition to the Group's anti-fraud policy, we also have a mandatory "Fighting Fraud" e-learning course.

Consisting of two modules, this e-learning course addresses the following themes:

### 1. Acquiring

the essential knowledge required for professionals in the insurance industry in order to assess the risk of fraud.

### 2. Working

on practical examples related to the Group's health & life business to learn how to react effectively in case of suspected or proven fraud.

81%

### OF EMPLOYEES

completed the mandatory "Fighting Fraud" e-learning course



for the business teams



“ We are committed to continuously improving the processing of complaints to meet regulatory requirements and protect our clients.

We apply a common procedure in accordance with the recommendations of the ACPR (French Prudential Supervision and Resolution Authority), aimed at meeting requirements and resolving our internal malfunctions.

## WHO IS INVOLVED IN THE ESCALATION SYSTEM?

All of our teams are involved in this approach.

Complaints officers are responsible for analyzing complaints and identifying any problem areas. They implement or propose corrective actions.

Conditions enabling our clients to receive a summary and a reasoned response as soon as possible and no later than two months following their submission

# Our ethical and responsible client commitment

## Complaint handling

### A SYSTEM OF ESCALATION

To enable claims to be handled differently according to their sensitivity, complaints led by a specific authority, mediator or contact are categorized into 3 levels, depending on the nature of the complainant's dissatisfaction and the person making the complaint



**96%**  
**OF COMPLAINTS PROCESSED ON TIME**

## EXCELLENCE IN THE SERVICE OF CLIENT SATISFACTION

To ensure a high level of client satisfaction, we implement several actions:

- MSH International's ISO 9001 recertification since 2005: This certification is issued by Bureau Veritas Certification and assesses the implementation of a quality management system designed to satisfy clients while controlling risks.
- We regularly measure client satisfaction through barometers and surveys, using this feedback to continuously improve the quality of our relationships.

Our ethical and responsible client commitment

# Encourage our suppliers and business partners to take part in our CSR strategy



## EcoVadis

Each year, we conduct an assessment of our CSR system relative to the EcoVadis platform. This assessment focuses on the quality of our CSR system in terms of our policies, actions and results. Despite enhanced assessment criteria, we achieved a score of 57/100 and the "committed company" badge.

EcoVadis assesses companies' CSR performance by analyzing their environmental, social and ethical impact and their purchasing practices. The platform assigns scores to help companies measure and improve their social responsibility.

We are committed to establishing sustainable and balanced relationships with our suppliers. That is why we work with EcoVadis to assess the social and environmental practices of our Tier 1 suppliers.

We also require all of our new suppliers and service providers to adhere to the key principles of human rights, labor law, the environment, anti-corruption, and responsible purchasing. This commitment is made by signing the supplier charter, which is incorporated into the contract when contracting takes place.

57/100

OVERALL SCORE

60%

OF THE 2024 GROUP  
PLANS SIGNATORIES

have signed the responsible  
suppliers charter

103

SUPPLIERS

assessed by EcoVadis  
between 2022 and  
February 2025

Our ethical and responsible client commitment

# (IDD) Insurance consumer protection

The European Insurance Distribution Directive (IDD) of January 20, 2016, which came into force on October 1, 2018, is primarily intended to enhance the protection of insurance consumers.

## The IDD is built around six pillars:

- The strengthening of the requirement to inform and the duty to advise with, in particular, the introduction of the information and advice sheet,
- The Insurance Product Information Document (IPID),
- The prevention of conflicts of interest,
- Transparency of remuneration,
- Product monitoring and governance,
- The requirement for professional training.

**This training offering is aimed at all our employees who are subject to professional qualification and who are therefore required to complete this annual mandatory training.**

This aims to enhance client protection by equipping employees with the skills they need, which are essential in the relationship of trust that binds us and in the excellence of client service to be delivered, as defined by the IDD.

↑  
**Strengthen our client protection**

**91%**  
**OF EMPLOYEES**  
completed the 15-hour IDD training requirement



### ONE-HOUR SESSIONS

led by our industry experts on various themes

**PICK & CHOOSE OFFERING**



### E-LEARNING MODULE

Modules freely available on Talentsoft



### SPECIFIC TRAINING PER BU

Legal and regulatory training organized per BU



### INDIVIDUAL TRAINING

Training courses listed in the Talentsoft catalog



### MANAGERIAL PATHWAY

Sessions specially designed for managers and heads of business units



Our ethical and responsible client commitment

# Protection of personal data

Our DPO, the Data Privacy team and the Data Protection Correspondents, have been working to ensure the security of the personal data processed. Their objectives are:

- **Ensuring** compliance and promoting a GDPR-focused culture.
- **Managing** the network of data protection correspondents.
- **Advising**, controlling and documenting data processing.
- **Processing** requests for the exercising of rights.

The CISO and the CIO play a key role. They are in charge of:

- **Identifying** IS risks.
- **Defining and applying** the information systems security policy (ISSP).
- **Implementing** IS security and training on safety standards.

In 2024, our Cybersecurity continued to enhance IS security through actions such as:

- **Awareness-raising** on phishing.
- **Testing** intrusion resistance.
- **Reporting** incidents directly from the messaging system.
- **Training**, with the mandatory cybersecurity e-learning course.

↩ **Vital expertise**

**4**  
**AWARENESS  
CAMPAIGNS**

**89%**

**OF EMPLOYEES**  
completed the "Cybersecurity"  
e-learning course

**18**

**INTRUSION  
RESISTANCE TESTS**

**87%**

**OF NEW EMPLOYEES**  
completed the general GDPR  
training

**1**

**INCIDENT  
REPORTING BUTTON**  
available to employees and integrated  
into the Group's messaging system

**Our Personal Data Officers (employees from the various business lines and subsidiaries) protect our Group's personal data and ensure our compliance with the GDPR.**

Their missions include:

- >> **Acting as the first point of contact** for GDPR compliance.
- >> **Informing** the DPO of new processing projects.
- >> **Awareness-raising** of data protection issues in their own Division.
- >> **Participating** in projects related to the protection of personal data.
- >> **Representing** their Division at the Personal Data Committee.
- >> **Ensuring** the updating of the register of processing activities.

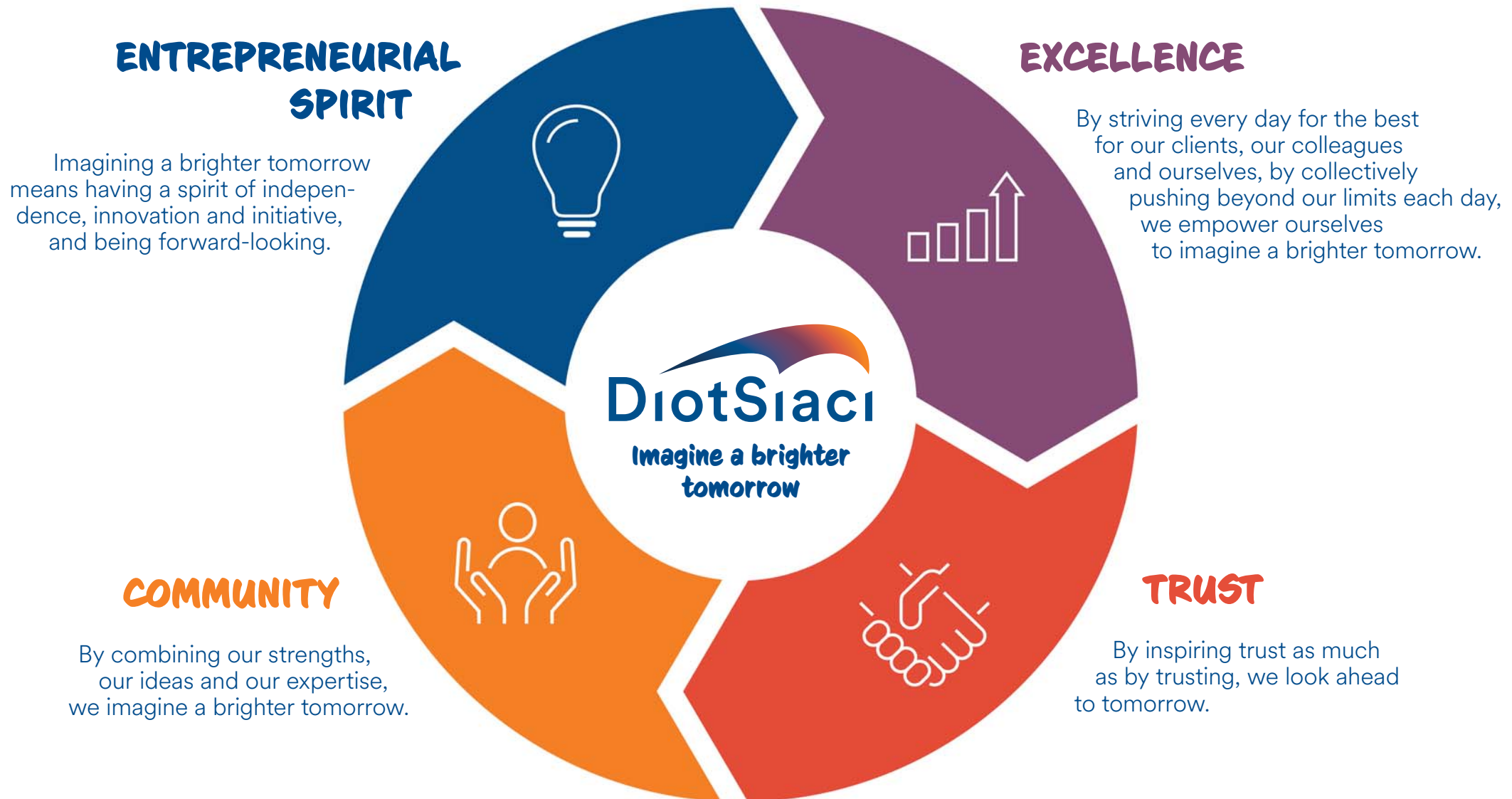
The Personal Data Committee, a key element of our data governance, is continuously trained by our Data Privacy team. We regularly circulate training notes on topics such as cookie management and European contractual clauses to all our employees via our intranet.

We support our clients in defining and choosing the optimal and sustainable structure to align their cyber insurance strategy with their risk-based approach.

**Diagnosis // Prevention // Placement**



# In 2025, we will continue to **build** on our values





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