

Vigilance Plan 2022



A PURPOSEFUL
MUTUAL
INSURANCE
GROUP



SUMMARY

	1. SCOPE	03
	2. IDENTIFICATION OF POTENTIAL MAJOR RISKS	03
	2.1 Risk identification and assessment methodology	03
	2.2 Major risk mapping	04
	3. GOVERNANCE AND OVERSIGHT BODIES AND SYSTEMS	07
	3.1 Governance	07
	3.2 Whistleblowing procedure	08
	4. RISK PREVENTION AND MANAGEMENT SYSTEMS	09
	4.1 Principles of responsibility	09
	4.1.1 <i>Ethical values</i>	09
	4.1.2 <i>Societal engagement strategy and "Our Societal Impact" programme</i>	10
	4.2 Environment	11
	4.2.1 <i>Climate change risk</i>	12
	4.2.2 <i>Pollution risk</i>	26
	4.2.3 <i>Risk of nuisance</i>	27
	4.3 Personal health and safety	28
	4.4 Human rights	32
	4.4.1 <i>Risk of discrimination</i>	32
	4.4.2 <i>Risk of failure to respect working conditions, freedom of association and freedom of expression</i>	42
	4.4.3 <i>Risk of illegal working and non-compliance with the minimum wage</i>	43
	4.4.4 <i>Risk related to the protection of personal data</i>	44
	4.4.5 <i>Risk of failure to process claims or misunderstanding of cover</i>	46
	4.5 Third-party assessment system	47
	4.5.1 <i>Assessment of suppliers, subcontractors and intermediaries</i>	47
	4.5.2 <i>Purchasing policy</i>	49
	4.5.3 <i>Raising supplier and subcontractor awareness</i>	50



1. SCOPE

The plan is drawn up at the level of Covéa Coopérations and concerns all Covéa Group activities.



2. IDENTIFICATION OF POTENTIAL MAJOR RISKS

2.1 RISK IDENTIFICATION AND ASSESSMENT METHODOLOGY

The risk mapping process for risks relating to the duty of vigilance¹ is based on the methodology set at Group level. It involved several stages:

- Identification of the nine major risks related to the duty of vigilance (human rights, health and safety, environment);
- Selection of processes that address the nine identified risks, based on the Covéa process manual;
- Cross-referencing of these processes with the associated operational risks from the mappings of different departments. Operating risks were identified by Permanent Internal Control;
- Assessment of the systems for controlling the nine identified risks by aggregation of the operating risks;
- Ranking of the nine identified risks via an evaluation the severity of each risk. This evaluation was carried out by assigning an impact and exposure frequency score on a scale from 1 to 10. The final score, combined with the assessment of the system for managing the risk, thus enables the level of criticality of the risk to be identified.

The results of this work are presented in the table below and will be updated regularly.

¹Risks relating to the duty of vigilance were mapped in relation to the companies whose risk management is carried out at Group level. Work to broaden the scope is under way.

2.2 MAJOR RISK MAPPING

ENVIRONMENT



Risk	Definition	Affected stakeholders
Climate change	Direct and indirect contribution to climate change through, in particular, the financing of fossil fuels, investment in activities that emit greenhouse gases (GHG), and the Group's energy consumption.	<ul style="list-style-type: none"> • Environment
Environmental pollution and pressure on resources	Damage to health, ecosystem regeneration capabilities and biodiversity (air, water and soil pollution, environmental degradation, etc.).	<ul style="list-style-type: none"> • Environment • Suppliers and service providers • Tenants • Employees • Customers/ members • Local residents
Nuisance	Nuisances produced in the form of noise, odours or visual pollution.	<ul style="list-style-type: none"> • Suppliers and service providers • Tenants • Employees • Customers/ members • Environment • Local residents

HEALTH AND SAFETY



Risk	Definition	Affected stakeholders
Personal health and safety	Harm to the health (physical and mental) and safety of individuals of any stakeholder (employees, customers, etc.).	<ul style="list-style-type: none"> • Employees • Suppliers and service providers • Tenants • Customers/ members

HUMAN RIGHTS AND FUNDAMENTAL FREEDOMS

Risk	Definition	Affected stakeholders
Discrimination	Discrimination against employees, customers or any other stakeholder, based on gender, disability, age, sexual orientation, family situation, social background or national culture, etc.	<ul style="list-style-type: none"> • Employees • Customers/ members • Tenants • Suppliers and service providers

<p>Failure to respect working conditions, freedom of association and freedom of expression</p>	<p>Violations of human rights: the right to work under fair and favourable conditions, respect for freedom of association and collective bargaining, prohibition of child labour or forced or compulsory labour, freedom of expression and opinion, etc.</p>	<ul style="list-style-type: none"> • Employees • Suppliers and service providers
<p>Illegal labour and non-compliance with the legal minimum wage</p>	<p>Condoning or putting in place any form of illegal work, whether it is undeclared work, illegal subcontracting, illegal supply of workers, employment of a foreign worker who does not possess a work permit, illegal multiple job-holding or benefits fraud, as well as failure to pay the legal minimum wage applicable in the countries in which the company operates.</p>	<ul style="list-style-type: none"> • Employees • Suppliers and service providers
<p>Failure to protect personal data</p>	<p>Impacts related to the protection of personal data and respect for the privacy of stakeholders, including customers.</p>	<ul style="list-style-type: none"> • Employees • Customers/ members • Suppliers and service providers
<p>Impact of failure to process claims or misunderstanding of cover</p>	<p>Risks incurred by stakeholders due to a failure to process or an excessive delay in processing claims, or a lack of education and transparency on the terms and conditions of the product offerings.</p>	<ul style="list-style-type: none"> • Customers/ members • Environment



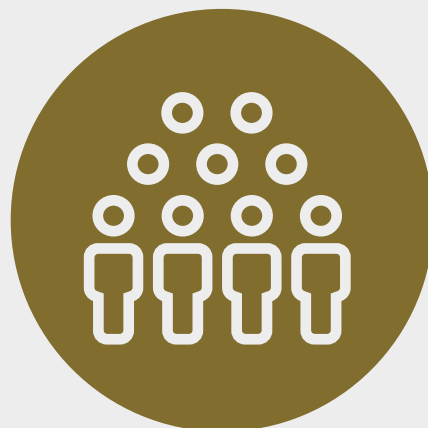


3. GOVERNANCE AND OVERSIGHT BODIES AND SYSTEMS

3.1 GOVERNANCE

Many Covéa Group support functions and business lines are involved in the vigilance approach, with the aim of preventing and managing potential risks in the various areas covered (employees, suppliers, service providers, environment, etc.) as effectively as possible:

- The Compliance Department is responsible for overseeing work to implement regulatory requirements on the duty of vigilance and for drafting the annual vigilance plan.
- Covéa's CSR committee is informed about the overall system incorporating the various vigilance tools. The committee is made up of the main business divisions and chaired by the Director of Social Engagement;
- The various operating departments (HR, purchasing, etc.) are in charge of deploying the risk management systems for duty of vigilance risks affecting their activity;
- The Compliance and Permanent Internal Control departments are responsible for checking compliance with duty of vigilance regulations and for the quality and implementation of the control systems associated with the risks. The Group's annual control plan covers risks relating to the duty of vigilance.





3.2 WHISTLEBLOWING PROCEDURE

In accordance with the law on the duty of vigilance, the Covéa Group has implemented an internal whistleblowing procedure that enables any third party to report situations relevant to the duty of vigilance, i.e., any risk of serious violations pertaining to human rights, personal health and safety, or the environment.

This mechanism is integrated into Covéa's single whistleblowing system, which was initially deployed as part of the provisions of the Sapin 2 law on whistleblowers and the anti-corruption system.

It is deployed for all Group entities.

COVÉA'S INTERNAL ALERT SYSTEM IS BASED ON:

- An internal whistleblowing procedure;
- An outsourced platform that enables secure communication with the whistleblower;
- A structure for collecting and processing whistleblower reports: the Head of Compliance takes charge of collecting reports, which are processed by an ethics committee of which he or she is the chairperson.



4. RISK PREVENTION AND MANAGEMENT SYSTEMS

4.1 PRINCIPLES OF RESPONSIBILITY



4.1.1 ETHICAL VALUES

The Covéa Group has an ethics charter, which was revised in 2021. This document forms the common foundation for the Covéa Group's values and the ethical commitment expected of its employees and corporate officers (directors and managers). This commitment is based on reasonable and appropriate behaviour in the general conduct of missions and business towards shareholders, customers, members, partners, service providers and third parties.

The charter covers topics relating to employment, society and environmental responsibility, customer protection, business ethics and protection of the Group's assets, indicating for each subject what forms of conduct are appropriate and what conduct should be avoided or forbidden. It also reminds readers of the existence of an internal whistleblowing procedure. The principles set out in this charter set a common standard of ethical requirements.

Group executives and management ensure that the guiding principles set out in this charter are properly understood. All employees are covered within this framework, regardless of their level of responsibility. The charter can be viewed by all employees and is available on the Group's website, www.covea.com.

4.1. SOCIETAL ENGAGEMENT STRATEGY AND "OUR SOCIETAL IMPACT" PROGRAMME

As a leading insurer, with a vocation to protect, Covéa seeks to play an active role in societal and environmental transition and to support all employees by seeking to build a sustainable growth model that benefits its usual stakeholders, its customers and employees and, beyond them, society as a whole.

In this way, the Group is expanding its core responsibilities in each of its spheres of activity and influence: as a company, employer, insurer and investor.

TO GO FURTHER, IT HAS DECIDED TO FOCUS ITS ACTION ON FIVE AREAS WHERE IT CAN LEGITIMATELY TAKE ACTION AND HAS THE POWER TO HAVE A STRONG IMPACT:

- **Equal opportunities:** Covéa seeks to promote a more inclusive society by taking action to promote equality and employability and by combating all forms of discrimination.
- **Knowledge:** Access to knowledge for as many people as possible is complementary to the equal opportunity challenge. The Group and its brands are developing educational and cultural partnerships.
- **Risk prevention:** This is an integral part of the insurance business. Covéa, as a responsible insurer, wants to use its expertise to benefit its customers and society as a whole.
- **Regional and local presence:** We want to encourage local economic dynamism and so contribute to reducing geographical divides.
- **Environment / environmental transition:** Covéa is helping to step up the transition to a more sustainable social model by reducing its environmental footprint, favouring impact investing and raising the awareness of its members and customers.

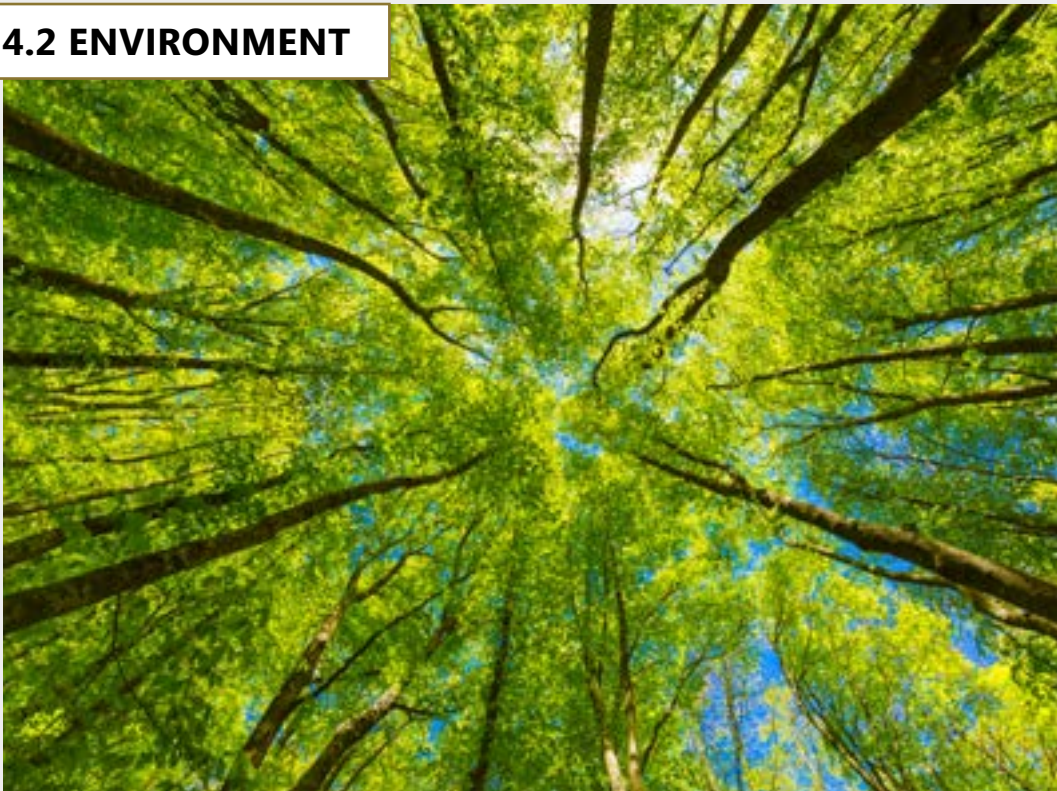
To achieve this ambitious plan, in 2020 Covéa adopted a new social engagement strategy entitled Our Societal Impact. The strategy aims to create a strong, inclusive and concrete societal impact, by demanding action and providing evidence of results (#PreuveEnEst).

In 2022, Covéa had its CSR policy certified by Ecovadis for the first time. With an overall score of 52 points out of 100, the Group obtained a bronze medal for its CSR performance. The results were especially high for responsible purchasing, and were balanced for the three pillars of environment, ethics and labour/human rights. Covéa is committed to continuous improvement and thus intends to increase its score in the coming years.

In 2022, some twenty projects involving nearly 150 internal contributors were deployed in 95% of the Group's major departments, making it possible to deliver the first expected evidence.

The Group's aims in terms of the inclusion of people with disabilities, support for women's rights and development of its low-carbon trajectory, as well as the creation of the Covéa Corporate Foundation, are incorporated into the very heart of its new strategy plan, "Covéa 2024 - Growing Together".

4.2 ENVIRONMENT



The Group has finalised its **low-carbon strategy**. Using the Science Based Targets method, it has identified the sources of its carbon emissions and the areas in which it can reduce them. Covéa has set a five-year target of reducing its direct greenhouse gas emissions by 3% a year, which is included in the 2022-2024 strategic plan.

The low-carbon trajectory is constructed around three major milestones aligned with Paris Agreement, COP21 and COP26 targets:

- 2024: 3% annual reduction of our direct emissions;
- 2034: 41% target reduction in greenhouse gas emissions in accordance with our Science Based Target trajectory;
- 2050: Final target: keep the rise in temperatures relative to the pre-industrial era below 1.5°C.

The three main action areas for achieving the targets are:

- Firstly, operations, i.e. direct emissions related to our day-to-day business;
- Secondly, our real estate and financial investments;
- Thirdly, the insurance business.

In practical terms, the Group has already begun concrete projects in respect of business travel, energy sources, the renovation of certain operating buildings, and waste management. In its insurance business, it seeks to provide special deals in relation to electric cars, promote the use of salvaged parts and materials, and provide customers with services for renovating their homes.

4.2.1 CLIMATE CHANGE RISK

This risk covers Covéa actions that have a potential negative impact on the environment and climate change, in particular due to greenhouse gas emissions.

To prevent and manage this risk, the Group is taking actions at four levels:

- **Investment strategy (financial assets and real estate);**
- **Environmental footprint;**
- **Research to better prevent risks;**
- **The design of product offerings and the repair of losses.**

With regard to PartnerRe sub-Group, our ESG efforts are currently focused on improving the society and managing climate risks in a continually evolving risk landscape. One of the objectives is to manage the impacts of climate change across liabilities, assets and corporate operations to build global resilience.

FINANCIAL ASSETS

Covéa Finance, Covéa's asset management company, supports and steers the Group's **ESG approach** in terms of securities investments. The integration of ESG criteria into investment processes is based on four pillars: exclusion policy, shareholder engagement policy, thematic funds and the carbon intensity of the portfolios.

The exclusion policy sets rules for the exclusion of all direct equity or bond investments in businesses involved in controversial armaments, tobacco production, significant gambling and betting activities or thermal coal, based on thresholds and a timetable for gradual disengagement by 2030 (for the OECD) and 2040 (non-OECD). This policy was expanded in 2022 to add unconventional oil and gas businesses to the list, based on a timetable for gradual withdrawal by 2030. Unconventional means production activities (according to certain thresholds) related to shale oil and shale gas, oil and gas from tar sands, coal-bed methane and extra-heavy oil.

The shareholder engagement policy governs the ESG analysis of private and sovereign issuers (equities and debt), voting at general meetings and shareholder dialogue. The latter enables Covéa Finance to confront issuers with the significant challenges they face and to encourage them to improve their performance and transparency on environmental, social and governance issues.

Specific scoring is applied to the fund ranges with an environmental theme and socially responsible investment (SRI) certification.

Lastly, Covéa Finance is developing a carbon intensity calculation for its portfolios. This benchmark meets the objectives of transparency (Article 29 of the French Climate Energy Act and its implementing decree), managing climate risk (physical risks and transition risks) and contributing to global warming mitigation targets. It is also used in the ESG analysis of stock issuers and is a selection criterion for some environment-themed funds.

REPORT ON MAIN ACTIONS TAKEN IN 2022

In 2022, Covéa Finance again tested the relevance of its approach by going through the SRI certification process for its four environment-themed funds (Covéa Aeris, Solis, Terra and Aqua), thereby adding to the existing range of SRI-certified funds (Covéa Flexible SRI and Covéa Actions Solidaires). This certification is also in line with the category 1 classification of these funds under AMF Guideline 2020-03, which attests that the average ESG rating of the securities in the portfolio is higher than that of its investment universe (the average ESG² rating of the fund's securities is higher than the average rating of the top 80% highest-rated securities in the universe).

After developing its social fund range in 2021 by obtaining Relance certification for the Covéa Perspectives Entreprises and Covéa Renouveau funds and Finansol certification for the Covéa Actions Solidaires fund, Covéa Finance continued to enhance its environmental credentials in 2022. The Covéa Terra fund was awarded Greenfin certification. Greenfin certification is a scheme set up by the French Ministry of the Environmental and Solidarity Transition which aims to mobilise investors' savings for the benefit of the energy and environmental transition. Certification guarantees the greenness of an investment fund and is aimed at investors who act for the common good through transparent and sustainable practices.

By obtaining such certification, Covéa Finance reaffirms a fundamental aspect of its approach of integrating ESG criteria sustainability risk assessment into fund management and its commitment to an approach that balances the three pillars of Environment, Social and Governance (ESG).

Having signed up in 2021 to the Just Transition Coalition, a collaborative platform launched by Finance for Tomorrow that brings together asset managers and owners in the French financial ecosystem to encourage companies towards a socially acceptable transition to a low-carbon economy, Covéa Finance has entered into shareholder dialogue with several companies in the energy sector. The concept of a just transition is particular-

2. Based on Covéa Finance internal ratings and external ratings provided by Covéa Finance's ESG data provider.

ly applicable to this sector, due to the extent of the challenges brought about by the transition to carbon neutrality and its role in the provision of affordable energy. The initial aim is to take stock of the progress of private companies on the concept of just transition.

In 2022, Covéa Finance exercised its voting rights for 93.32% of the shares it held, based on an in-depth analysis of the resolutions by ESG analysts, in accordance with the principles defined in its shareholder engagement policy. In 2022, Covéa Finance voted at 348 general meetings. Lastly, Covéa Finance held 40 meetings with issuers to discuss the company's ESG practices.

97.4%

of eligible assets under management were analysed using ESG criteria as at end-2022.

RESPONSIBLE REAL ESTATE

Covéa pursues a responsible real estate investment policy led by Covéa Immobilier.

Covéa Immobilier anticipates changes, acts to reduce its carbon emissions, manages and monitors the energy efficiency of buildings, values the attractiveness of heritage and involves the occupants of buildings in their environmentally friendly use. Among other things, it has committed to and signed the Buildings Energy Efficiency Charter, the Circular Economy Charter for the Real Estate and Construction Sector (Circolab Charter) and the City of Paris Water Management Charter.

Covéa Immobilier has also continued to coordinate its sustainable development policy and has in particular implemented concrete measures for the Tertiary Decree through the "Tertiary Eco-Energy" project, developed the circular economy and preserved and improved biodiversity in cities.

Covéa Immobilier is also preparing to set a carbon reduction trajectory strategy and to set formal action plans to reduce GHG emissions.

Covéa Immobilier now wishes to bring these initiatives under one roof, organise them using a consistent approach, and include real estate assets in a harmonised low-carbon trajectory that also contributes to protecting the future value of its assets. It has therefore decided to set up the “Research, Innovation & Transition” unit.

This team will support the business lines in their missions, so that the actions undertaken lead us towards a real estate heritage that:

- is increasingly adapted to climate and societal challenges;
- is protected in its valuation; and
- will progressively reach a low-carbon target by 2050.



REPORT ON MAIN ACTIONS TAKEN IN 2022

In 2022, Covéa Immobilier continued to improve its roadmap for Covéa and its subsidiaries.

It has defined the different phases of its project to track its carbon trajectory:

- Phase 1: benchmarking;
- Phase 2: audit Covéa Immobilier’s carbon data;
- Phase 3: set KPIs (key performance indicators);
- Phase 4: draw up action plans.

It has developed actions to raise awareness among occupants:

- animation, once a year, of environmental appendices with our tertiary tenants for areas greater than 1,000 m²;
- distribution of tenant guides for most new tenants;
- organising a “green committee” with all tenants who have signed an environmental appendix and are affected by the Tertiary Eco-Energy decree.

It has continued to optimise management of its resource consumption:

- through the implementation of the “Tertiary Eco-Energy” project, 85% of authorisations to access the private consumption data of our tenants have been received. One hundred and seventeen new energy saving actions have been identified;
- through instrument-based energy management, in particular of the heating for residential buildings, accompanied by an action plan.

Covéa Immobilier is strengthening its role and actions in the development of the circular economy:

- It has been a founding member of Circolab (circular economy in construction) since 2018.
- It reinforced and stepped up its commitment to the re-use of materials by joining the “Booster *du Réemploi*” (“Reuse Booster”) initiative in 2021. Five projects a year will join this initiative over a three-year period starting in 2022. The aim is to use the maximum possible amount of material and equipment and enable the emergence of new industries.
- The transformation of tertiary premises (100% circular renovation) into three dwellings at 55 rue de Lyon was awarded the “Renovation – residential buildings” prize at the Circular Buildings Awards organised by *Booster du Réemploi*. The environmental result was a saving of 18.9 tonnes of CO₂ for a single construction budget.
- The reuse of spare parts recovered from our work and maintenance sites is becoming widespread with our maintenance providers.
- An examination of reuse with manufacturers (Kone, Daikin, Schneider, Carrier, etc.) has begun.
- A test phase to develop the potential of the resources present in the buildings was started in mid-2022 with Upcycléa at the Nord Pont site. The framework will be adapted to other sites by the maintenance providers and teams.
- A materials reuse platform was set up at Quai le Gallo on 15 September 2022.
- As part of the development of our green spaces, we are studying the possibility of using outdoor furniture that has been salvaged or is based on recycled materials.

Covéa Immobilier also systematically conducts a sustainable development audit before each major restructuring project.

Biodiversity and water management are also key issues for us:

- The Resp’Imm working Group, made up of volunteers from the Investment Department, aims to bring nature back into the lifestyles of our tenants. An action plan has been put in place to improve biodiversity and develop and enhance our green spaces, while facilitating their access and use by occupants of our buildings. The greening of the main courtyard at 55 Châteaudun was the first project to be delivered, at the end of 2022.

- Four biodiversity scoring grids have been rolled out to the teams tasked with auditing our existing green spaces. Twenty-two audits had been carried out by late 2022.
- Covéa Immobilier is one of the founders, alongside the OID and Gécina, of the "BIG" programme to drive and coordinate biodiversity improvement.

Covéa Immobilier is transforming its car parks to facilitate low-impact mobility: action plans to encourage low-impact mobility and convert parking spaces into bicycle parking have also been put in place. A master agreement was signed with the company "12.5" and installations were carried out at four residential sites.

Covéa Immobilier also pays particular attention to waste management: a waste management inventory was carried out to assess Covéa Immobilier's compliance with regulations. An action plan was then defined, with gradual implementation over the course of 2022.

Lastly, the following certifications were obtained in 2022:

- The premises at 46 Breteuil (buildings A, B, C and D) obtained BREEAM certification,
- The 14 Haussmann property obtained HQE operating certification,
- The 18 Courcelles property obtained BREEAM certification,
- The 4 place des Ailes property obtained BREEAM certification.

Since 2012, more than 170,000 m² of tertiary assets have been certified upon construction or renovation and 97% of restructured tertiary properties have been certified.

Covéa Immobilier conducts an annual greenhouse gas audit of buildings managed on behalf of the Group. The carbon footprint of real estate investment assets in 2022 was:

12.33 kgCO₂e/m²

Covéa energy-related greenhouse gas emissions per m² (15.33 kgCO₂e/m² in 2021, 8.25 kgCO₂e/m² in 2020).

ENVIRONMENTAL FOOTPRINT

Protecting our environment has become a universal challenge. Covéa is aware of the specific challenges it faces and is committed to environmental protection and the environmental transition.

The Group is thus committed to sustainable growth and targets a 3% annual reduction in its direct greenhouse gas emissions by 3% per year. The Science Based Target method allowed the emissions sources related to Covéa's operating activity and the ways in which to reduce them to be identified. A trajectory was then established to reduce these emissions. This "Low Carbon Trajectory" is the Group's guiding principle on this subject, with three major milestones aligned with the global objectives set by COP21 and COP26 (2024, 2034 and 2050).

This emissions reduction target represents a strategic challenge for Covéa, and forms part of the "Covéa 2024 - Growing Together" strategy plan. It is also a collective target, as it has been incorporated into annual bonus scheme for managers and the profit-sharing agreement.



REPORT ON MAIN ACTIONS TAKEN IN 2022

In 2022, Covéa continued its commitment to reduce the environmental impact of employee travel, for both business travel and commuting.

This resulted in a significant increase in the share of low-emission vehicles in our long-term lease fleet and senior managers' cars.

Low-emission vehicles are also being added to the short-term lease fleet. Mail shuttles in the Île-de-France region are electric vehicles. The Group is also encouraging staff to use more environmentally friendly modes of transport, which will also enable them to reduce the cost of their commutes.

Covéa has, among other things, put a sustainable mobility package in place that includes a wide range of transport options and generous allowances. A major launch and employee awareness-raising plan was implemented for this measure, particularly at the time of European Mobility Week, with the support of Covéa's network of local CSR reps.

Covéa also launched a two-month trial at three central sites which involved lending 60 electrically-assisted bicycles to employees in partnership with GoodWatt. This initiative met with keen interest from employees. The trial will therefore continue next year.

In September 2022, on the initiative of the Niort local reps and in consultation with the conurbation authority, an electric express bus line called "TANLIBEXPRESS" was introduced to link Niort city centre directly to the MAAF site at Chauray. Buses run in the mornings and evenings.

In late 2022, a call for tenders was issued to roll out a carpooling platform for employees in early 2023, to encourage employees to carpool for commuting purposes.

In addition, the Group has also just signed a contract with Automobile Club Formation to train employees in traffic risks and eco-driving.

A multi-year plan has also been put in place to develop the Group's infrastructure so as to promote low-impact mobility, particularly for employees who travel by bicycle (showers, bike shelters, ramps, cycle paths on campuses, etc.).

As part of our real estate master plan, employee relocation projects are subject to an impact study and awareness raising on alternative forms of transport to private cars.

In 2022, Covéa Immobilier continued to deploy and coordinate its sustainable development policy

With regard to reducing energy consumption:

- The "Tertiary Eco-Energy" project that was organised and launched within the Le Mans, Niort and Paris Operational divisions, was continued. The first action plans were drawn up with an energy management consultancy with a view to achieving the target of cutting energy consumption by 40-60% within the regulatory deadlines;
- An energy efficiency plan was laid down in September 2022 to participate in the national effort and thus respond to government requests. It aims to reduce energy consumption by 10% by 2024 and has three major components:
 - heating temperature set to a maximum 19°, with air conditioning triggered from a minimum temperature of 26°;

- commitment to draw up a reduction plan concerning the lighting of outdoor spaces and signage on central sites;
- an eco-action campaign with all Group employees.

The Covéa Group is committed to renewable energy sources and energy production:

- Since 1 December 2022, the Group has had a 100% renewable energy contract with EDF for all our operating sites;
- Two projects to build shade canopies equipped with solar panels are under way at the Niort site (MAAF), with the aim of producing 10% of the site's electricity consumption (5,177m², 3,000 panels - 1 megawatt-hour discounted cumulative saving); and at the Chartres site (MMA) (3,780 m², 2,160 panels, 799 kilowatt-hours discounted cumulative saving).

Under the “Booster *du Réemploi*” programme, efforts to develop the circular economy have been strengthened by reusing materials on construction sites and by seeking out salvaged materials as an alternative to new materials. This includes the Dauphin2/ Dauphin3 phase at the Niortis'immo site and the renovation project for the Espace P building in Le Mans.

Pilots were conducted in 2022 to maximise the reuse of furniture either in-house or externally through donation or resale:

- furniture was given to employees during four site emptying operations;
- old furniture at sites was re-employed when they were renovated (DCRC Nantes, DSI Narval);
- second-hand furniture was purchased at some sites as an alternative to buying new furniture.

In addition, the deployment of the waste management policy continued in 2022 via:

- application of the site waste management charter on a trial basis on the Espace P and C03 projects (Le Mans Californie);
- the “Products, Equipment, Materials, Waste” diagnostic (MEWP in French) was carried out on three operating projects: Espace P, C03 (Le Mans) and Niortis'immo D2-D3 (Niort);
- the ÉcoMégot cigarette butt collection and recycling solution was introduced at all our central sites;
- a strategy was defined regarding the traceability of all our hazardous and non-hazardous operational and worksite waste and contracts with our service providers were updated to

involve them in this approach.

- Lastly our catering partner Sodexo ran an anti-food-waste scheme, "Wastewatch", throughout 2022, which made it possible to identify which areas generated the most waste with a view to launching actions as from 2023.

During European Waste Reduction Week, Covéa ran a scheme to collect unused IT equipment in partnership with the "Les Ateliers du Bocage" association, whose skills in sorting and reuse, as well as its socially responsible environmental and digital activities, have been recognised for more than 25 years.

Biodiversity is also a central part of Covéa Immobilier's concerns:

- Biodiversity-themed events were held at Tivoli, Niort and Le Mans. The aim was to tell employees about the site-specific environmental management principles implemented with service providers on our sites and to celebrate the *EcoJardin* certification we obtained at the end of 2021 for the Niort site.
- *EcoJardin* certification was also obtained in 2022 for the Saran site (GMF).
- Covéa Group aims to achieve certification for five of its major sites by 2024. An *EcoJardin* expert has been appointed in order to provide optimal support to the real estate teams at the sites in question.

Lastly, Covéa has recently begun a diagnostic check on the economical use of digital resources, in order to set an operational roadmap for reducing the carbon footprint of its IT.

13.17 kgCO₂e/m²

Covéa's energy-related greenhouse gas emissions (9.36% less than in 2021 and 12.32% less than in 2019).

PartnerRe sub-Group look to Native Energy to offset the carbon emissions related to some of its business operations, while Swiss Climate Foundation helps to support small and medium enterprises on the forefront of energy efficiency and climate protection. PartnerRe have entered into a partnership with the Climate Neutral Group to offset the carbon footprint of its business travel by air and rail.

Carbon footprint is taken into account for all new PartnerRe offices. Many leases have been renewed in the last five years, and PartnerRe's main offices are now housed in buildings with various environmental certifications. These range from LEED Certified (US) to LEED Gold (Ireland) via BOMA Best (Canada), Minergie Eco (Switzerland), High Environmental Quality (HQE, France) and SG Clean (Singapore).

RESEARCH TO IMPROVE RISK PREVENTION



To anticipate and act on climate change as well as possible, the Covéa Group has published a white paper on these changes. The result of several years of research, this scientific study identifies and quantifies the major upcoming climate risks in France's European territory.

The aim of the white paper is to quantify the change in the frequency and intensity of four high-risk climatic hazards – storms, droughts, floods and hail – between now and 2050. This study uses an innovative multi-model approach, providing a Covéa-wide view of potential claims while retaining the specific regional variations of the portfolios of its various brands.

DESIGN OF INSURANCE PRODUCTS AND REPAIR OF CLAIMS

The insurance products offered by the Covéa brands are evolving in response to current societal changes and new customer needs.

Work has been carried out with the various business divisions to identify the features that an insurance offering with a social and environmental impact should exhibit. These criteria make it possible to evaluate the current offerings and identify areas for improvement. The goal we are striving for is to offer insurance products that meet customers' expectations while improving their social and environmental impact throughout the lifetime of the policies.

REPORT ON MAIN ACTIONS TAKEN IN 2022

Comprehensive home insurance

The collaborative economy and its digital platforms are generating new uses for homes. Covéa's brands are supporting this by offering coverage and services linked to home-swapping or home rentals, as well as extensions of civil liability cover for exchanges of goods and services.

The housing policies of each brand also offer protection for renewable energy equipment (photovoltaic, solar, geothermal, etc.) and where needed insurance for the resale of electricity (within civil liability insurance for MMA).

MMA IARD and MAAF may also inform insureds about their exposure to flood risk when they take out their policies.

To reward efforts to improve the energy performance of homes, MAAF offers discounted home insurance for customers who have obtained an energy savings certificate for the work they have carried out and customers who have performed a voluntary energy performance assessment. The MAAF *Éco Habitat* programme offers other services to support more environment-friendly housing: renovation grants, access to the *ÉCO-Artisans*® directory of tradespeople with "ÉCO Artisan Energy Efficiency" certification, competitive home improvement loans, an eco-quote service and a legal information service.

MAAF has also created a home insurance offering that best meets the coverage needs of young people.

Members of GMF also benefit from a reduction in home insurance if their home has an energy performance assessment of A, B or C. They can also receive technical support from GMF on estimates for their energy saving renovation work.

GMF also offers insurance solutions tailored to the needs and budgets of young people, in particular on housing, casualty and family policies.

Car and motorcycle

Covéa brands also insure electric cars and cover the battery, whether it is leased or purchased, in the same way as the vehicle.

Breakdown cover includes towing the vehicle to the nearest charging station.

Price reductions are also granted to drivers of environmentally friendly vehicles.

To limit the environmental impact of a motor, home or construction loss, it is necessary to promote sustainable repairs to our customers. This can take several forms: favouring repair over replacement, using salvaged spare parts or choosing business partners who specialise in eco-friendly repairs.

4.2.2 POLLUTION RISK

Pollution risk is the risk of damage to the health of ecosystems (air, water and soil pollution, etc.) and their regeneration capacities (overexploitation of resources, irreversible damage to environments, etc.).



REPORT ON MAIN ACTIONS TAKEN IN 2022

When carrying out repairs after motor accidents, Covéa seeks to limit its environmental footprint through various measures:

- Ensuring the quality of its service providers for motor claims: Covéa analyses in particular the environmental performance and certifications of recyclers, vehicle breakers and breakdown services;
- Putting an overall strategy in place to encourage the use of spare parts from the circular economy: Covéa favours eco-friendly windscreen firms who offer repair rather than replacement and engage in carbon offsetting or allocate funds to waste recovery centres in the social and solidarity economy;
- Encouraging changes in vehicle repair techniques: the CESVI Technocentre (90% owned by Covéa) promotes changes in vehicle repair techniques. It also encourages garage owners and experts to opt for repair instead of replacement and to reuse certain parts. It provides training to electric vehicle repairers and a mechanism to encourage the repair and renovation of car wheel rims at repair garages was introduced in 2021;

- Setting up services to eliminate travel by customers, repairers and experts to limit carbon footprints. During hailstorms, mobile bodywork repair platforms are positioned as close as possible to affected customers to repair damaged vehicles;
- Assessing claims for minor car accidents either by having insureds take standardised photos of the damage themselves and send them to the authorised repairer for assessment, or by having the repairer take photos of the vehicle and send them to the claims adjuster;
- Lastly, Covéa and its subsidiaries are continuing their partnerships with leading paint manufacturers for the use of solvent-free paint.

4.2.3 RISK OF NUISANCE

This risk concerns causing or producing nuisances in the form of noise, odours or visual pollution.

REPORT ON MAIN ACTIONS TAKEN IN 2022

On the Group's properties, the strict application of safety rules and business line procedures and the performance of work on Group buildings in a high-safety environment enable the environmental impact of nuisance risk to be controlled.

With a strong commitment to reducing its environmental footprint, Covéa Immobilier seeks to obtain environmental certification for all projects in relation to its owned real estate portfolio. In 2022, the following were obtained:

- **Renewal of the BREEAM In-Use certification for Tivoli (all companies);**
- **Renewal of the ISO 50001 certification for the Saran site (GMF);**
- **BREEAM In-Use certification - Part 2 'Good' level - for Hermione (Fidelia Tours);**
- **BREEAM 'Very Good' certification for Dauphin 5, Niort (MAAF).**

At the end of 2022, for the central operating sites, more than 69,523 m² had "Works" certification (2021: 62,840 m²) and more than 76,000 m² had "In-Use" certification (2021: 68,000 m²).

4.3 PERSONAL HEALTH AND SAFETY



This risk covers harm to the health (physical and mental) and safety of all Covéa stakeholders, employees, customers, members, local residents, etc.

Employee health and safety has always been a priority for the Group, and the health crisis has only heightened the importance of this issue. With this in mind, Covéa has taken steps to ensure the continuity of its business while preserving the physical and mental well-being of its employees.

Covéa's ethics charter, published in 2021, reiterates the principles for maintaining health and safety in the workplace. It also sets out the specific actions the Group has put in place to prevent and manage these risks in respect of both employees and third parties.

Covéa's occupational risk prevention and health at work policy is intended to:

- promote quality of life at work;
- preserve the physical and mental health of employees;
- reflect legal requirements regarding health and safety at work;
- contribute to sustainable business performance;
- play a role in the quality of social dialogue.

Within the Human Cooperation Department, this policy has the support of a dedicated cross-departmental team that operates at the Covéa Group's various sites. Employees can also contact a specialist local team directly.

The agreement on quality of life at work and working conditions addresses several issues:

- Covéa implements a well-identified approach with key parties, with the aim of sustainably incorporating the principles of preventing occupational risk and improving quality of life at work and working conditions into its daily activity,
- Covéa intends to continue to ensure that employees' work is organised in a way that respects health, safety and work-life balance,
- Given the environmental and climate emergency, Covéa has put in place and developed systems to meet these challenges, including remote working, the "greening" of the company vehicle fleet, the sustainable mobility package to promote low-impact mobility, and various measures such as charging points for electric and plug-in hybrid vehicles, shade canopies equipped with solar panels at central sites, etc. Covéa intends to complement these measures by encouraging more environment-friendly modes of transport.



REPORT ON MAIN ACTIONS TAKEN IN 2022

In 2022, Covéa continued to operate a risk prevention unit to support and listen to employees and managers. Covéa also supported employees by promoting vaccination and took care to allow a gradual resumption of activity on the sites, while maintaining Covid prevention measures.

The Covéa Single Document was also updated. Key risks were the subject of an annual risk prevention action plan in three areas:

- take action on the work environment;
- familiarise, inform and equip employees;
- detect and take charge of substandard working situations affecting an individual or Group and provide the necessary support.

The aim of the occupational risk assessment and prevention process is to prevent and reduce or eliminate employee exposure to one or more work-related risks. The preventive measures implemented enable us to limit the impact of these risks on employees' physical and/or mental health and contribute to strengthening well-balanced working conditions.

Covéa continued its regular prevention and health initiatives: analysing absenteeism and workplace/commuting accidents, coordination between business lines, risk assessment, human impact studies, rethinking the traffic risk and asbestos training plans, update to prevention procedures.

Covéa also signed the Parenthood Charter for the sixth consecutive year. The Group is thus committed to offering a favourable working environment for employees with children. Covéa puts concrete initiatives in place, including nursery places and occasional or emergency childcare solutions, as well as conferences and workshops, coaching and training on a variety of topics such as sleep, food, learning, etc.

Lastly, in 2022, Covéa began its first Group-level employee feedback survey to test the level of internal engagement. More than two thirds of employees expressed their views in this survey (67% engagement rate) with a very even spread of responses by region and division, enabling a true and realistic picture of the climate within the Group to be obtained. The survey thus garnered 11,000 comments on various topics such as remote working, improving tools and the complexity of internal processes.

The results of this first internal survey put the spotlight on Covéa as an employer that pays particular attention to its employees. Covéa's strengths include its work-life balance, physical working conditions, pay and benefits packages and respect for diversity.

Concerning the last of these, seven out of ten employees believe that Covéa deals well with diversity issues.

Identified areas for improvement are as follows: a communication plan to provide better awareness of all Covéa's innovation actions, promoting Covéa's commitment to respecting the environment, greater individual recognition, more flexibility for remote working, and a programme to modernise our working environment.

The 2022 survey will also feed into the 2023 action plans of each department.

1.66%

The rate of occupational accidents with time off work in 2021 (2020: 1.976%; 2019: 2.583%).

81%

of eligible employees worked remotely (2020: 77.6%).

67%

of employees took part in the 2022 survey and the employee engagement rate was 63%.

PartnerRe sub-Group operates "Stay Fit", a global employee well-being program instituted to address this challenge and is aimed at building awareness about healthy work-life habits, addressing the toll stress takes on our mental health, and building resilience. PartnerRe hosted a series of live information sessions for our employees by expert external speakers from the Resilience Institute on how to become more resilient - physically, emotionally and mentally. PartnerRe also provides employees with access to a confidential Global Employee Assistance Program (EAP). This includes support and resources on family, health, life, financial well-being and work and access to connect with a counselor or coach.

4.4 HUMAN RIGHTS



4.4.1 RISK OF DISCRIMINATION

This is the risk of discrimination against employees, customers, members or any other stakeholder based on gender, disability, age, sexual orientation, family situation, social background, religion, etc.

Covéa's ethics charter, published in 2021, reiterates the principles of promoting inclusion and diversity, combating all forms of discrimination, and combating all forms of sexist behaviour and harassment.

The ethics charter also sets out the specific actions the Group has put in place to prevent and manage these risks in respect of both employees and third parties.

COMMITMENTS TO EMPLOYEES

Covéa's identity as a mutual organisation means that it is committed to equal opportunities. Covéa's aim is to have a **strong, inclusive and concrete societal impact**, accompanying everyone on the road to a world of sustainable growth. The Group is therefore committed to promoting diversity through an inclusive approach, giving all employees a place, regardless of their personal attributes, differences and opinions.

This aim is visible in 5 major areas:

- promoting diversity and inclusion;
- preventing and combating discrimination and all forms of violence;
- equality of opportunity and equal treatment for all in access to employment, recruitment, career paths and in the daily working environment;
- gender equality in the workplace and in careers;
- recruitment and retention in employment of people with disabilities.

Since 2017, this aim has also been reflected in our adherence to the Diversity Charter, which stands as evidence of the Group's proactive commitment and forms part of a process of continuous improvement and sharing achievements.

In line with the actions taken over many years, in 2022 women's rights and the inclusion of people with disabilities were included in the "Covéa 2024 - Growing Together" strategic plan.

In addition to the ambitious targets negotiated in its latest gender equality agreement, Covéa has set a new target of achieving gender parity in the recruitment of senior and executive managers in 2024.

Another challenge that has been taken up is to make Covéa and its brands the most "welcoming" company for people with disabilities.

The two diversity agreements (the gender equality agreement and the disabilities agreement) are flagship commitments for Covéa and concrete evidence of its commitment to equal opportunity, one of the five action areas in the "Our Societal Impact" strategy.

Through its Corporate Foundation, set up at the end of 2022, Covéa Group is also working to have a positive societal impact in the three areas of women's rights, inclusiveness and knowledge.

The Group's commitments to its employees have received several international awards, and Covéa ranks 141st out of 850 European companies in the Financial Times "Diversity Leaders" list for 2023 (2022: 175th).

REPORT ON MAIN ACTIONS TAKEN IN 2022

Employment and inclusion of people with disabilities

- The three-year Disabilities Agreement was signed. Covering the period from 2021 to 2023, the agreement aims to integrate people with disabilities in an inclusive manner that contributes to their employability. It also sets an ambitious target of recruiting 150 employees with disabilities by the end of 2023. An interactive booklet has been made available to employees to share and explain the main areas of focus;
- 6.25% of employees had a disability in 2022 (6.70% in 2021);
- 60 employees with disabilities were recruited in 2022 (50 in 2021);
- 316 employees received support in 2022 from the Disabilities Mission and the occupational health division (363 in 2021);
- A key contact person has been appointed for the implementation of digital and physical accessibility projects.

Preventing and combating discrimination

- As of the end of 2022, 63% of employees had started or completed the “Diversity to Make a Difference” e-learning course since it was first put online in 2019;
- The roll-out of the “Recruiting without Discrimination” module for recruitment officers continued. Seventy-one recruitment officers have now taken this module since it was first introduced in 2020;
- The “Inclusive Communications” training module for communications staff remained in use for the third year.

Gender equality

- A new three-year agreement (2021-2023) was signed on gender equality in the workplace, covering six action areas: promotion and external recruitment, professional training, work-life balance, preventing gender-based and sexual violence, and effective remuneration. These action areas are structured around concrete targets and commitments for which implementation plans are developed in order to achieve the targets that have been set.

Significant actions include:

- a target of 57% female management;
- an increase in the budget for reducing pay gaps to €600,000 over the term of the agreement;
- paternity leave pay in excess of the legal requirements, at net salary level throughout the duration of leave;

- continued deployment of the “Women’s Pathway and Plan” training module, with a new module in 2022 for non-managerial staff. The aim is to support women in their career plans and develop leadership skills; 77 female employees took this module in 2022.
- A new training module on “Preventing and Acting against Gender-based and Sexual Violence” was developed. It is intended for managers and will be deployed over a five-year period.

In 2022, Covéa published a workplace equality score of 91 points out of 100 (data as at the end of 2022), a similar result to 2021; the score for the Covéa economic and social unit (UES Covéa) is 88 points out of 100, 5 points down on 2020.

Covéa’s overall percentage of women employees remained steady at 65.8%.

The Cov&elles network (Covéa’s women’s network) and its 40 local ambassadors in the regions carry out initiatives to promote women’s careers and gender equality in professions.

The network celebrated its fifth anniversary at its annual meeting on 14 June, which brought together nearly 500 participants. This was an opportunity to review the network’s progress and the flagship actions it has taken to promote gender equality since it was set up, to look ahead and to announce the opening of the network to all employees. Initially open to women in positions of responsibility, Cov&elles now allows all proactive, motivated employees to participate in and support actions in favour of gender equality.

Integration of young people into work

- Covéa is committed to promoting the integration of young people into working life, in order to strengthen and renew the company’s skills and support access to training for all. In this sense, 400 work-study students were recruited for the 2021-2022 academic year. 600 work-study students were hired in September 2022. In total, 700 work-study students will be present within the Group in 2022-2023.
- Covéa is targeting a permanent increase in the number of work-study employees to 3% of the Group’s total workforce. A comprehensive system has been put in place to provide better support to these young people, with a dedicated community that supports and unites them.

- Covéa obtained “HappyIndex Trainees Alternance” certification for the second consecutive year, following a survey of our work-study students. 94% of respondents recommend the Group as a place to take a work/study programme.

COMMITMENTS TO EXTERNAL STAKEHOLDERS

In addition to actions to promote diversity and equality within Covéa’s internal teams, the Group works on this subject with its customers/members and in society more broadly.

REPORT ON MAIN ACTIONS TAKEN IN 2022

Commitment to women’s rights with the Women’s Foundation
Since 2020, Covéa has supported the Fondation des Femmes, France’s leading foundation for women’s rights and the prevention of violence against women. Covéa made an initial donation of €500,000 in 2020 at the start of the lockdown to address the urgent need for protection of women against violence. In 2022, a second donation of €400,000 enabled the foundation to fund two programmes.

- The first involves helping associations to carry out projects such as the creation of “Maisons des Femmes” (women’s support centres) or the development of seven-day helplines, which are still too few in number throughout the country;
- The second aims to raise public awareness, through actions such as the establishment of a unit to monitor women’s issues and the organisation of a travelling train exhibition, such as that which travelled through the main cities of France in spring 2022.

In 2022, Covéa, together with the Fondation des Femmes and other companies, also took part in the development of a prevention guide to help companies take more account of domestic violence. This guide will be distributed to all employees who provide support and help deal with situations involving the harassment of or violence against women.

The workplace is a good place for victims to be heard, as well as a legitimate intermediary that can point them to the professionals who can provide the emotional, legal and social support they need.

Helping girls obtain education and careers

As part of its partnership with the Capital Filles association, **113** Covéa female staff members volunteered as mentors for the 2021-2022 school year at **15** schools districts. They will support high-school girls from working-class and rural areas in their education and careers.

Promoting the place of women in the business world

In March 2022, U2P, in partnership with MAAF, published its “women’s local business” survey to promote female entrepreneurship. The survey gives the public access to a wealth of valuable information on the place of female business leaders, on developments in gender diversity and on how these women feel about their career choices.

Promoting the inclusion of disadvantaged young people into the workplace with NQT

As a partner of the “Nos Quartiers ont des Talents” (NQT) association since 2015, the Group is committed to the inclusion into the workplace of young graduates from disadvantaged neighborhoods or backgrounds. Covéa’s mentors are committed to using their professional experience and their network to help their mentees begin their careers, and they took action in 2021 to meet the high demand from young people.

- **134** Covéa mentors assisted **151** young people.
- **48%** of young people mentored in 2022 found a job or training at the end of the mentoring period.

A speed coaching session was conducted in 2022 at Covéa’s Paris offices.

Promoting the inclusion of young people in the workplace through partnerships with educational institutions

As part of its societal commitment to young people, Covéa has signed several partnerships with educational institutions: Paris-Dauphine University, EFREI and the Web School Factory.

Numerous events took place all through the year to enable students to meet the Group’s managers and employees working in

jobs that match the courses of study provided by the institutions. Through these partnerships, Covéa pursues a proactive policy to integrate young people into working life.

École 42 Angoulême for the training of young programmers

Since 2021, MAAF has supported the association École 42 Angoulême, which specialises in training young programmers. By providing support with the school's operating costs, MAAF encourages the development of knowledge, actively participates in the revitalisation of its local area in Charente and Nouvelle-Aquitaine and promotes gender equality in IT occupations.

The institution, founded at the end of 2021, has a distinctive educational approach and has a target of providing free training for 400 students by the third year of operations. In 2022, 173 students attended the school in its first two classes.

Partnership with Media Social Food

MAAF supports this non-profit association, which has set itself the mission of training young people with no qualifications or people undergoing retraining in how to create food-related video and photography for social media. In 2022, MAAF commissioned Media Social Food students to produce portraits of the 12 finalists of the MAAF Taste and Health Award.

Better support for disabilities

The MMA and MAAF brands have set up two foundations in relation to disability and inclusion.

Under the aegis of the Fondation de France, the MMA Solidarity Foundation supports non-profit schemes aimed at promoting the skills, well-being, development and social inclusion of people with disabilities, particularly young victims of accidents.

In 2022, it contributed €579,650 to 72 new projects. Since its establishment in 1983, the MMA Solidarity Foundation has supported more than 2,500 projects which have helped more than 25,000 people with disabilities.

The aim of the MAAF Foundation is to support and finance innovative projects to improve the daily lives of people with disabili-

ities. It supports communication and disability awareness initiatives, contributes to the financing of medical investigations and research and helps with the development of new devices, cultural actions and integration projects.

In 2022, the Foundation launched its third call for projects as part of its multi-year commitment (2019-2023) to the issue of helping people with disabilities as they age. Since its creation, it has supported more than 100 projects and paid out more than €2 million in grants.

Partnership with the French Disabled Sports Federation: inclusion through sport

In 2022, Covéa signed a major partnership with the French disabled sports federation (*Fédération Française Handisport* - FFH) for the "*Parcours jeunes handisport*" (Young People's Pathway to Disabled Sports) programme, which helps young people with disabilities gain confidence and self-esteem. This partnership is in line with the Group's commitment to equal opportunities and inclusion, which is a strong focus area of its 2024 strategic plan and a key action area for its corporate foundation.

With this programme, Covéa is contributing to the social integration of young people with disabilities through sport. For the Group, this partnership also represents an opportunity to hire talented people with disabilities, including young people on work-study programmes and top-level athletes in competition or retraining (fixed-term and permanent employment, sponsorship agreements). It also raises employees' awareness of disability through messages and testimonials from athletes, and by offering them the opportunity to actively engage in a personal capacity in volunteer activities at competitions or events organised by the FFH.

- 1400 employees have attended FFH-related events at the six sites;
- two awareness-raising seminars have been held with input from top athletes (MAAF Marketing and Communication seminar, Personal Injury Claims Department seminar);
- four top-level disabled athletes joined the Group in 2022 (three athletes signed sponsorship deals with MMA and one was hired on a permanent contract by GMF).

Covéa is a "Major Patron" of the FFH.

Partnership with My Human Kit to develop solutions with the help of people with disabilities

In 2022, Covéa signed a partnership agreement with My Human Kit, an association that aims to have technical aids and equipment manufactured by, with and for disabled people. This approach is a way to promote the adaptability and inventiveness of these people, while also developing solutions with them that specifically meet their needs.

Covéa provides support by participating in the operation and development of the non-profit project and by providing venues and spaces for meetings and production, for and with people with disabilities. The Group contributes to the promotion of this model in France and internationally by helping lead “Humanlabs”, the first network of fab labs dedicated to manufacturing technical aids for people with disabilities, and by helping to making disability aid prototypes available in an open source environment. It will also contribute to the organisation of two “Fabrikarium” events over the period 2022-2024. Covéa Group employees may also take an active role in these events on a voluntary basis.

In 2022, the first international Humanlabs meeting was held in Rennes. A three-day “Fabrikarium” held from 17 to 20 October brought together 60 people, who worked in six teams on six projects with open source solutions. Six Covéa employees were on hand to provide their skills and know-how. For three days, the teams, guided by disabled people with regard to their needs, designed and built six different solutions that combined creativity with digital manufacturing and collective intelligence.

France’s National Parks

In 2021, GMF, the French National Parks organisation and the French Office for Biodiversity renewed their three-year sponsorship agreement on the theme of “Shared Nature”. Over this three-year term, projects will be developed based on providing knowledge and access to nature for all, including people with disabilities, preserving biodiversity and risk prevention.

Since this partnership began back in 2008, GMF has supported 136 actions, including 16 new projects in 2022 such as:

- improving the accessibility of the documentation centre at the Cevennes National Park in Génolhac (Gard) for people with reduced mobility, the visually impaired and the blind;
- supporting a multidisciplinary scientific mission to catalogue unexplored biodiversity at Mont Belvédère de la Haute Camopi in the French Guiana Amazon Park;
- climate event risk prevention at the Écrins National Park, by supporting work to rebuild and adapt the Glacier Noir bridge (Hautes-Alpes).

4.4.2 RISK OF FAILURE TO RESPECT WORKING CONDITIONS, FREEDOM OF ASSOCIATION AND FREEDOM OF EXPRESSION

This risk concerns violations of human rights: the right to work under fair and favourable conditions, respect for freedom of association and collective bargaining, prohibition of child labour or forced or compulsory labour, freedom of expression and opinion, etc.

Covéa's ethics charter reiterates the principles of promoting respect for human rights and respect for health and safety at work. It also sets out the specific actions the Group has put in place to prevent and manage these risks in respect of both employees and third parties.

REPORT ON MAIN ACTIONS TAKEN IN 2022

Covéa is committed to **high-quality social dialogue**. This takes place within different bodies, depending on the scope of the issue. The employee representative bodies within the Covéa UES (economic and social unit) are composed of a central Social and Economic Committee (works council) and three site-based works councils at Niort, Levallois and Le Mans.

Following a return to normal health-related conditions after two years of the Covid crisis, the various employee representative bodies within the Group actively continued their work under “pre-crisis” conditions in 2022. All meetings are now held face-to-face, although representatives who wish to do so continue to have the option of attending remotely.

The quality of social dialogue, to which Covéa is deeply committed, remains high in spite of an economic environment impacted by the aftermath of Covid, the war in Ukraine, rising inflation, and climate events. The response to this difficult environment included in particular the taking of measures to support employees’ purchasing power. These notably included the signing in June of new profit-sharing and incentivisation agreements, as well as by a specific pay measure to which all trade unions signed up. Moreover, in response to expectations of the unions, it was also decided to bring forward the mandatory 2023 annual remuneration negotiations to November.

In addition, new progress was made on quality of life at work and working conditions (QLW-WC) was made in an agreement signed in February 2022. This agreement complements existing agreements, some of which fall within the scope of QLW-WC, on matters such as gender equality, disability, working hours, remote working, etc. This agreement also contains two emblematic measures, namely the internal survey performed as from 2022 and the sustainable mobility grant to promote responsible commuting.

Lastly, this year was the year of preparing for the works council elections, which will take place in 2023, with the negotiation of the pre-electoral agreement and intense activity both within the social dialogue bodies and with the employees.

Meetings held with employee representative bodies accounted for 54% of the total annual activity of the Covéa Corporate Affairs division (number of meeting days relative to the number of working days).

4.4.3 RISK OF ILLEGAL WORKING AND NON-COMPLIANCE WITH THE MINIMUM WAGE

This risk concerns condoning or putting in place any form of illegal work, whether it is undeclared work, illegal subcontracting, illegal supply of workers, employment of a foreign worker who does not possess a work permit, illegal multiple job-holding or benefits fraud, as well as failure to pay the legal minimum wage applicable in the countries in which the company operates. For the Group's activities in France, the risk of illegal work and non-compliance with the minimum wage is well regulated by local regulations. The countries in which Covéa's subsidiaries and affiliates operate also have regulations that allow this risk to be managed.

4.4.4 RISK RELATED TO THE PROTECTION OF PERSONAL DATA

This risk concerns impacts related to the protection of personal data and respect for the privacy of stakeholders, including customers.

Covéa takes extreme care to ensure data protection and confidentiality, transparency of information for data subjects, the compliance of its data collection and processing and the security of its information systems. The Group also takes care to anticipate future regulations and the consequences of technological developments, and actively participates in industry discussions on the application of the General Data Protection Regulation (GDPR).



REPORT ON MAIN ACTIONS TAKEN IN 2022

In 2022, Covéa continued its process for following the principles laid down by the GDPR, with the support of a dedicated five-person data protection team under the Data Protection Officer (DPO) and the data protection representatives appointed in the main Brand and central services departments that process personal data. "Privacy by design" formed an integral part of the various projects that were carried out and the necessary data protection impact assessments (DPIAs) were carried out. The Group has also taken steps to strengthen the rules for customer access on the brands' websites.

Lastly, Covéa has provided training to its employees on the use of sensitive data and the rules for the protection of personal data.

94%

of Covéa employees completed the "Mission GDPR" training module in 2022 (93% in 2021).

Covéa's cyber-attack risk prevention policy ensures the continuity of the essential activities of the Group's various business lines and missions. An overall global information systems security policy was developed in 2017 to set the fundamental principles with regard to information systems security. It reflects management's demands to put resources in place for the effective protection of the information systems. Responsibility for this policy lies with the Group Chief Information Security Officer. An information system user charter is also appended to the Group's internal regulations in order to set out the responsibilities of each user of our IT systems.

The IT Risk and Security Department runs a "CyberSafe" awareness programme for all employees. This includes:

- provision of a progress report on the CyberSafe programme to management committees (MAAF, MMA and GMF brands);
- communication campaigns on the Group's intranet and social network, with competitions and articles to improve people's understanding of cybersecurity;
- a training course comprising several modules including travel, passwords, IT equipment updates, links and attachments, etc.;
- phishing exercises for all Group employees, to raise their awareness of how to spot fraudulent emails and advise them in order to develop the right reflexes.

Cybersecurity staff can be contacted by the Group's employees by sending an email to cybersafe@covea.fr.

33 %

of Covéa employees have completed at least one module of the ISS training course (32% in 2021).

Within PartnerRe, comprehensive measures have been put in place - with controls and audit procedures - to protect PartnerRe systems and data as well as its customers' data. Workforce awareness is regularly strengthened through training and phishing simulations.

4.4.5 RISK OF FAILURE TO PROCESS CLAIMS OR MISUNDERSTANDING OF COVER

This means the risks incurred by stakeholders due to a failure to process or an excessive delay in processing claims (e.g. economic consequences for VSEs or tradespeople), or due to a lack of education and transparency regarding the terms and conditions of cover.

To manage this risk, the Group's entities rely on a comprehensive set of business procedures that detail the various procedures and practices in place, such as claim set-up processes, authorisations, payment approval procedures, guidance notes, technical documentation, etc.

This document, which is available to all operational staff, is supplemented by ongoing training for managers, legal officers and remote advisors.

Operational staff and managers perform numerous controls on the application of business rules (compliance with procedures, authorisations, payment authorisation limits, etc.) and claims management, particularly in the P&C, life assurance, legal protection, assistance and health activities. The results of these controls are satisfactory overall and make it possible to identify the main areas for continuous improvement and associated actions.

4.5 THIRD-PARTY ASSESSMENT SYSTEM



4.5.1 ASSESSMENT OF SUPPLIERS, SUBCONTRACTORS AND INTERMEDIARIES

Business ethics and responsible governance are key CSR issues for Covéa. Preventing the risk of corruption and preventing the social and environmental risks associated with the use of subcontractors and suppliers are regulatory obligations.

REPORT ON MAIN ACTIONS TAKEN IN 2022

The Covéa Group sets out an appropriate risk management system for its third parties. Regulations in multiple areas, such as Solvency II, Anti-corruption rules, Anti-money laundering/combating the financing of terrorism (AML-CFT), the Duty of Vigilance, the GDPR, IT security, etc., impose obligations regarding the assessment, contracting and oversight of the third parties with whom we do business. All Covéa third parties are affected: suppliers, subcontractors, customers, brokers, financial partners, etc.

As part of a programme set up at Group level in 2021, Covéa thus draws up and implements legally compliant but operationally pragmatic procedures for the assessment and control of third parties, prioritising the evaluation of third-party suppliers and subcontractors.

In 2022, several procedures were rolled out to assess the integrity of third parties with regard to the duty of vigilance.

- A procedure for approving and assessing third-party suppliers has been introduced. It targets suppliers of both goods and services, in particular service providers, subcontractors and third-party claims handlers.
- Material subcontractors and those to whom the Group outsources critical or important operational activities or functions are assessed by means of a specific questionnaire.
- Covéa third parties in relation to indirect real estate investments, private equity and M&A transactions are also assessed in accordance with a specific procedure.

Covéa Immobilier assesses its suppliers using the Group's tools and has a CSR assessment questionnaire that applies to all calls for tender above €200,000 and covers the specific features of the construction industry.

Lastly, delegated brokers are assessed using tools developed within the EDIcourtage organisation by the main insurance companies in the market. The EDIconformité digital compliance

solution is a tool for assessing the level of compliance of brokers, in particular by sending out and analysing questionnaires. Covéa is using this solution, into which a new topic area on the duty of vigilance was incorporated in 2022 by way of a question on gender equality in the workplace and another on compliance with obligations relating to the prevention of undeclared work.

4.5.2 PURCHASING POLICY

In its purchasing policy, Covéa makes a long-term commitment on the societal impact of its purchases. The Group takes into account the environmental, social and societal effects of its purchases on its internal and external stakeholders. Specifically, this policy is based on:

- a Group system for the overall management of third-party supplier risk, which ensures a unique “360 degree vision” of supplier risk;
- a digital risk scoring system, based on a segmentation of customers into four risk Groups (low/medium/high/very high), which defines and triggers an appropriate assessment system as required;
- a reliable third-party assessment system that involves sending out assessment questionnaires, including a CSR evaluation, to all third parties consulted in our calls for tender, which accounts for 20% of the overall score awarded to the supplier;
- including companies in the sheltered work sector and/or independent disabled workers in consultations and calls for tenders, whenever the purchasing contract allows it;
- inviting tenders from SMEs in order to support the fabric of the economy, provided that they can meet the relevant specifications.

Covéa is defining indicators to monitor the effects of this policy.

REPORT ON MAIN ACTIONS TAKEN IN 2022

Since September 2022, 100% of the suppliers approached in connection with calls for tender have received a CSR questionnaire.

Covéa raises employee awareness of responsible purchasing via communication actions carried out throughout the year.

In 2022, for example, awareness campaigns on the sheltered work sector were conducted with all buyers. At the same time, meetings between Covéa's CSR experts and the business lines helped to raise awareness of this issue in line with the Group's guidelines.

An e-learning module on the purchasing policy also provided an opportunity to revisit the fundamentals of responsible purchasing.

4.5.3 RAISING SUPPLIER AND SUBCONTRACTOR AWARENESS

Covéa requires its service providers to do everything they can to prevent violations of human rights and fundamental freedoms, harm to the health and safety of individuals, and any environmental damage that may result from the activity they carry out on the company's behalf.

Covéa thus takes care to inform all internal and external stakeholders of the legal requirements relating to the duty of vigilance in an accessible, clear and transparent manner. To this end, an explanatory brochure has been available on the Group's website since 2019. This enables stakeholders to gain a sound understanding of these ideas so that every individual can exercise their own vigilance and ensure that they act accordingly.



A PURPOSEFUL
MUTUAL
INSURANCE
GROUP

MUTUAL GROUP INSURANCE COMPANY

governed by the French Insurance Code
RCS Paris 450 527 916
86-90, rue Saint Lazare - 75009 Paris

www.covea.com

@Groupecovea on     

