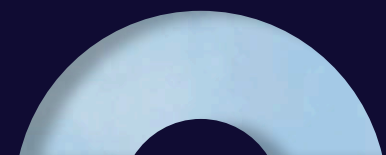


Statement of non-financial performance

2019 FINANCIAL YEAR






mymoneygroup

bank of values



What is the Statement of Non-Financial Performance (SNFP)?

This statement is a document which presents non-financial and yet important information about My Money Group (the "Group"). It describes the Group's activity in social, employment and environmental matters.

The Group outlines its **business model**, values, services and identity.

This statement also details the primary non-financial risks and challenges related to the Group's activities, based on three main themes:

EMPLOYMENT MATTERS

setting out the Group's policy to attract and retain talented employees, support them throughout their careers and enable them to grow.

SOCIAL MATTERS

highlighting how the Group is adjusting its services to new consumer habits of banking products, particularly through digitalization.

ENVIRONMENTAL MATTERS

focusing on the challenges related to the Group's historical presence in the French Overseas Departments and Territories (DOM) and New Caledonia, which have been impacted by climate change and by the increasing number of natural disasters.

KEY FACTS

on the Group's non-financial performance, business model and strategic vision in terms of social and environmental responsibility

WHAT IS
MY MONEY GROUP'S
BUSINESS MODEL?

The value proposition



SIMPLE, CUSTOMISED CREDIT SOLUTIONS



A GROUP OF EXPERTS

with many years of experience as part of Sovac,
Royal Saint Georges and GE Money Bank



A CLOSE AND RESPONSIVE PARTNER

which adapts to its customers' needs



A RENOWNED ACTOR

which contributes to the development of credit
in Metropolitan France and Overseas

The figures



17,3 %
RATIO OF
SOLVENCY



854
EMPLOYEES



179 M€
NET BANKING
PRODUCT



6 200
DÉPOSITORS
excluding depositors sent
by the Deutsche Bank



5 246 M€
OUTSTANDING
LOANS



127 000
CUSTOMERS

The investors



Shareholders

Funding sources



58 %
DEPOSITS



42 %
STRUCTURED
FINANCING

The activities



DEBT CONSOLIDATION

A range of refinancing loans with or without a mortgage guarantee



CONSUMER LOANS

Financings to help our customers carry out their projects, including personal loans, revolving credit, and insurance



SAVINGS

A range of savings products distributed through a partner network of Advisors in Wealth Management



AUTOMOTIVE FINANCING

A full range of financing solutions for to individuals and automotive companies



REAL ESTATE AND PROFESSIONAL CREDIT

A range of financing solutions for professionals in the realisation of their projects



SPECIALIZED FINANCING

A range of products to accompany financial investors in their development or external growth projects

The distribution channels



DIRECT BRANCH DISTRIBUTION

Headquarters and 3 agencies (DOM)



DIRECT REMOTE DISTRIBUTION

33 Counsellors



INTERMEDIARY DISTRIBUTION

706 distributors

The locations


my**money**bank

PARIS, NANTES


my**partner**bank

PARIS

 Socalfi

NOUMÉA

 Somafi-Soguafi

SAINT-PIERRE,
SAINTE-MARIE

 Sorefi

BAIE-MAHAULT,
LE LAMENTIN, CAYENNE

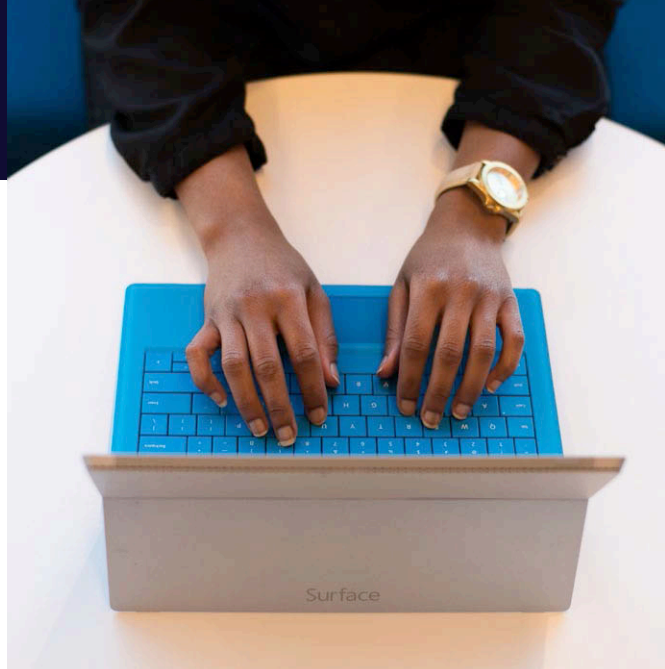
WHAT ARE THE GROUP'S INITIATIVES TO ADDRESS SOCIAL CHALLENGES AND RISKS?

My Money Group applies a zero-tolerance policy towards any unethical behaviour, in particular when it comes to the distribution of its products. The Group is particularly vigilant in preventing conflicts of interest and any abusive commercial practice is prohibited.

At the same time, the Group has also put in place measures to ensure strict compliance with regulations, to reduce the risk of non-compliance, risk mapping, regulatory monitoring, a training policy and an internal control system.

Consumers protection is also a priority for Group, as reflected by its policy of banking inclusion and the prevention of over-indebtedness. This policy aims at the early identification of customers in a financially fragile state, and to support them, when possible, with appropriate solutions.

Employee training is also key to ensure that My Money Group takes ownership of these sensitive issues.



WHAT ARE THE GROUP'S INITIATIVES ON PERSONAL DATA PROTECTION?

Protecting personal data is key to implement an innovative digital strategy.

At My Money Bank, all actions taken are monitored by the "GDPR" Steering Committee and the "Data Privacy" Committee.

At My Partner Bank, recently integrated into the Group, the GDPR programme is managed by an external DPO (DPMS Company).

Links to the relevant sections:

- [The Business Model](#)
- [Social Issues and Risks](#)
- [Data Protection and Cyber Security](#)

WHO IS MY MONEY GROUP?

My Money Group stands out as an independent and reliable player in the banking sector, specialising in finance and savings solutions for consumers and businesses both in mainland France and overseas.

WHAT ARE THE GROUP'S KEY EMPLOYMENT MATTERS?

The Group wanted to make 2019 the year of a learning enterprise approach.

To achieve this goal, more than **1 300 training initiatives** and **15 000 hours** were delivered to more than **700 employees** in 2019.

The Group incorporated a greater diversity of media, addressing a wider range of subject. The internal training offer is expanding continuously. Employees thus have access to long and short courses, face-to-face courses, MOOCs and e-learning. These new learning methods introduce and promote day-to-day training.

In parallel, employees benefit from cross-cutting training measures linked inter alia with the cultural and organisational changes conducted in 2019. In this context, training courses were delivered addressing the agile method, UX Design, collective dynamics, becoming an 'intrapreneur', and the business model (managers).

Since 2011, My Money Bank has taken concrete action towards gender equality. The recruitment process is straightforward: for applicants with the same profile and for the same position, the Group undertakes to guarantee strictly identical recruitment conditions for women and men. The Group also guarantees career development evolutions with equal access for women and men to promotion and mobility.

WHAT IS MY MONEY GROUP'S STRATEGIC PERSPECTIVE?

My Money Group has identified six strategic imperatives for its development:

1. **PURSuing BALANCE SHEET GROWTH IN ORDER TO REACH A CRITICAL SIZE**
2. **INTENSIFYING ORGANIC GROWTH BY EXPANDING THE PRODUCT RANGE**
3. **DEVELOPING A COMPETITIVE FINANCING CAPACITY**
4. **IMPROVING THE OPERATING RATIO**
5. **INCREASING PROFITABILITY (RETURN ON EQUITY)**
6. **BUILDING VALUE THROUGH INNOVATION AND TECHNOLOGY**

Links to the relevant sections:

- [Introduction to My Money Group](#)
- [The Group's services](#)
- [Attracting and retaining talent](#)
- [The Group's strategic prospects](#)

01

Statement of non-financial performance | My Money Group's ethical and responsible commitments

8

1. The regulatory environment
2. Scope of the statement
3. Introduction to My Money Group
4. Group values and identity



02

My Money Group's business model | Transparency at the heart of the Group's model

26

1. A model that creates value
2. The Group's services
3. Integration in the industry
4. Strategic prospects



03

Non-financial risks and challenges

42

Operating in a changing world

1. Employment considerations 44
 - A Attracting and retaining talent
 - B Employees' commitment
 - C Diversity and equal opportunities

2. The social challenges 58
 - A The responsible distribution of the Group's products
 - B Data protection and cybersecurity

3. Environmental concerns 72
 - A Adapting the business to environmental challenges
 - B The physical risks of extreme climate events



04

Reminders and general information

82



05

Annex: Independent third-party report

88





01



**Statement of non-financial
performance** | *My Money Group's
ethical and responsible commitment*



1

What is the regulatory environment of the statement of non-financial performance?

WHAT IS THE LEGAL BASIS FOR THE STATEMENT OF NON-FINANCIAL PERFORMANCE?

Since the financial year ending on 31 December 2018, the requirement for a statement of non-financial performance has replaced the report on corporate social responsibility (CSR) in order to provide dynamic reporting appropriate to each economic player.

The Order 2017-1180 of 19 July 2017 transposed the **European CSR directive** (Directive 2014/95/EU on disclosure of non-financial and diversity information by undertakings) into French law, and defined the content and scope of the statement of non-financial performance. The Order reviewed the scope of the entities concerned and simplified the arrangements for verification of the published information by focusing on large undertakings. Subsidiaries are now exempted individually where their information is presented by the parent company in a consolidated report.



As a financial holding company, Promontoria MMB ("the Company"), the parent company of My Money Group, is therefore subject to these disclosure obligations regarding its non-financial performance, since it exceeds the consolidated threshold established by article R.225-104 of the Commercial Code.

The scope of the present statement of non-financial performance consequently corresponds to the financial consolidation scope of Promontoria MMB as presented below.

Thus, the obligations set out in articles L.225-102-1 (amended by Order 2017-1180 of 19 July 2019), R.225-104, and R.225-105-1 of the Commercial Code (articles amended by the Decree 2017-1265 of 9 August 2017) and L.511-35 of the Monetary and Financial Code are applicable to Promontoria MMB as the consolidating reporting entity, and to the entities within its consolidation scope, together forming "My Money Group" (the Group).



Promontoria MMB has appointed KPMG S.A. as an independent third party responsible for verifying, in accordance with the provisions of article R.225-105-2 of the Commercial Code, the compliance of the present statement of non-financial performance and the accuracy of the 2019 information it contains.

This statement will be appended to the Promontoria MMB consolidated management report for 2019, submitted for validation to the Board of the reporting Company on 15 April 2020. It will be available for consultation on the Company website for a period of five years.

WHAT DOES THIS STATEMENT CONTAIN AND WHAT IS THE PROCEDURE UNDERTAKEN?

In accordance with the requirements for the statement of non-financial performance, the Company presents its **business model** along with the main non-financial risks and challenges facing its activities.

My Money Group has desired to strengthen its approach to non-financial responsibility by integrating it more closely with its activities. To this end, in 2018 the Group for the first time identified the non-financial risks to which it is exposed over the whole value chain. It has continued this approach in 2019 with the integration of MPB.

This approach is additional to the risk mapping already conducted by the Group (strategic, credit, financial, operational and compliance risks, etc.) in accordance with the applicable banking regulations.

Non-financial risks have been identified in three stages:

- **definition of the scope of non-financial risks:** identification of the risks and challenges that could have a significant impact for the Group, or which the Group entails for society in the broad sense. This scope was established on the basis of results of the CSR reports produced in recent financial years, and in consultation with the main departments concerned. After this, a restricted scope of risks and issues was defined in working parties with representatives of the various departments in order to ensure the consistency of the risks identified with the Group's business sector, geographical locations and key issues.
- **risk assessment:** each risk was subjected to an assessment using the same approach as that applied by the Group risk department. All risks were therefore assessed on two criteria: the inherent likelihood of the occurrence of the risk, and the extent to which this risk is controlled.
- **prioritisation of risks:** based on these risk assessments, the Group then worked together to identify and rank several priority non-financial risks which are summarised in the present statement. This will be appended to the 2019 management report submitted for validation to the Board of the reporting Company, Promontoria MMB, on 22 April 2020.



In 2019 My Money Group's objective has been to refine this approach, in particular by integrating My Partner Bank (formerly the Banque Espirito Santo et de Vénétie - BESV) in the scope of the statement as explained on page 14.

To address the risks thus identified, the Group relies on existing policies and those introduced in 2019, and on targeted initiatives leading to general or specific measures, the methods and results of which are presented in this report.

The information is then expanded under three headings, covering the main non-financial risks and challenges facing My Money Group, in employment, social and environmental terms.

THE EMPLOYMENT SECTION

presents the group's internal employment policy designed to attract and retain talented employees, supporting them throughout their careers and enabling them to develop.

An ambitious training policy enables the Group to ensure that its employees are trained so as to guarantee the highest service level, the dissemination of its values and ethics, and their personal development.

THE SOCIAL SECTION

covers the risks and challenges associated with market activities and environments.

Exposed to the new dynamics of the financial industry, My Money Group is continuing to adapt to the new ways in which banking products are consumed, inter alia through digitalisation.

Desirous of distributing its products with respect for the regulations and for its codes of conduct in terms of ethics and values, My Money Group is a responsible player in the banking world.

THE ENVIRONMENT SECTION

focuses more particularly on the issues arising from the Group's historical locations in the French overseas departments (DOMs) and in New Caledonia.

Climate change and the growing numbers of natural disasters in these geographical areas directly affect its clients, employees, assets and business more generally.



The present statement only addresses topics applicable to the My Money Group activities and business model. Consequently, the following topics are not developed:

- **wastage and food insecurity:** on the Europlaza Tower site at Paris La Défense, housing the registered offices of the Company and its main subsidiaries, the inter-company restaurant is managed independently of the company. For the other sites or entities, dedicated and equipped refectories are provided for all employees;
- **responsible, fair and sustainable food choices:** the inter-company restaurant at the Paris La Défense site is managed independently of the Group, so measures to encourage responsible, fair and sustainable food choices are taken by the site manager, and in some cases in association with user companies;
- **circular economy:** this does not directly affect the Group, but it nevertheless ensures that its activities are conducted in a way that limits the consumption and waste of raw materials, such as paper and non-renewable energy sources.
- **respect for animal welfare:** the Group has no direct nor indirect reason to deal with animal issues.

Although these topics are not expanded in its non-financial performance statement, the Group acknowledges their importance in general terms. ●

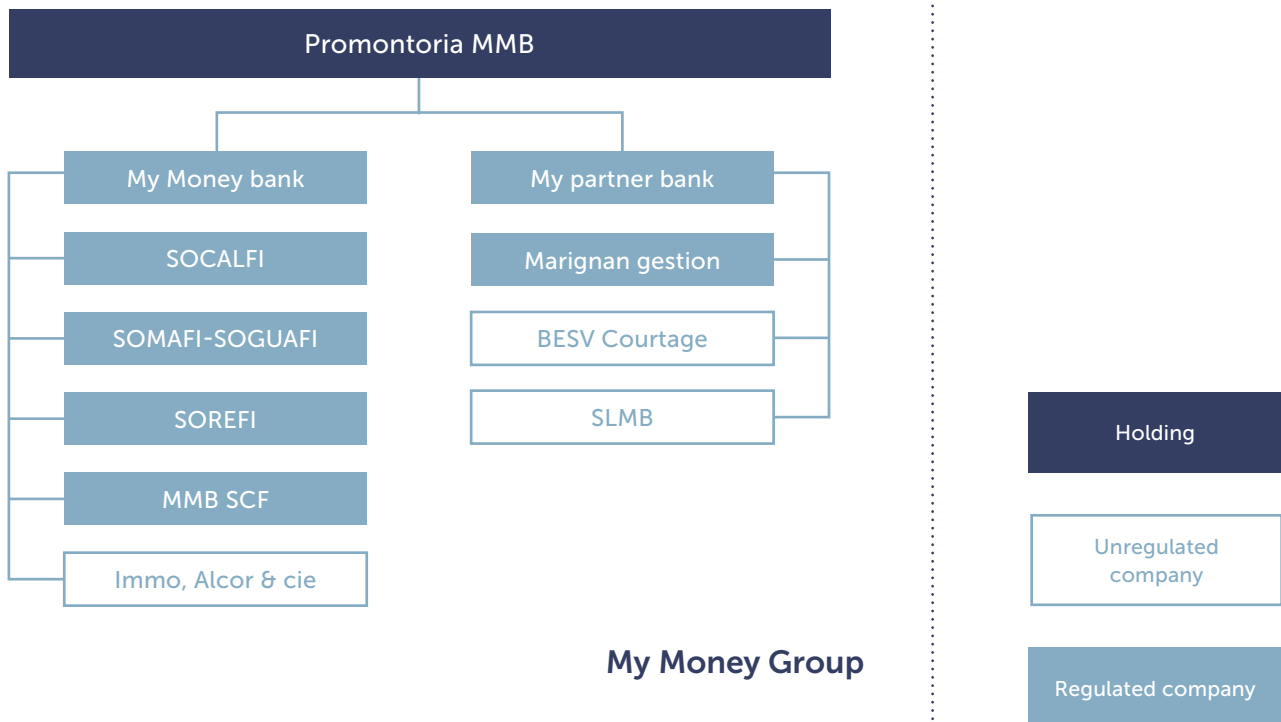


2

What is the scope of the statement?

As explained above, the regulatory scope of the statement of non-financial performance is the consolidation scope of the financial holding company Promontoria MMB and all of its operational subsidiaries.

Following the acquisition of the Banque Espirito Santo et de Vénétie (BESV) (which became My Partner Bank on 1 July 2019) and its subsidiaries, the entities in the consolidation scope concerned as of 31 December 2019 are as follows:





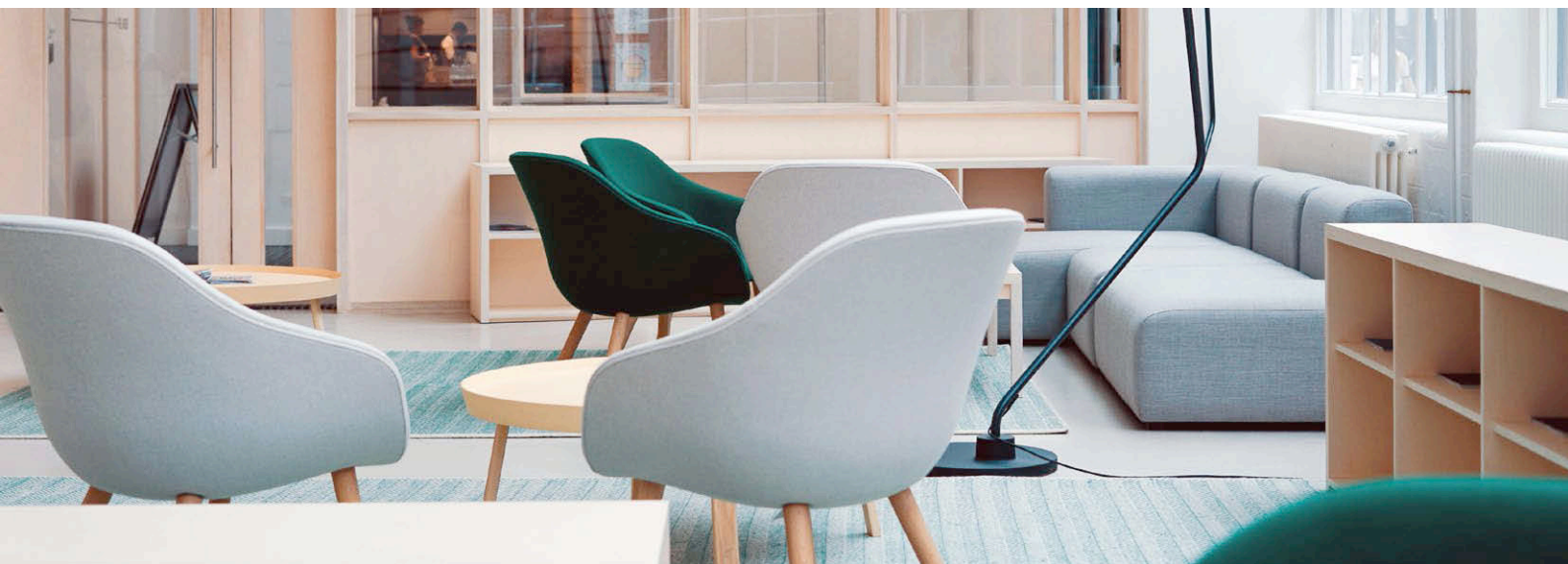
Given the integration of the companies in the My Partner Bank group (formerly BESV) at 28 December 2018, the information presented in the My Money Group statement of non-financial performance for the 2018 financial year did not take them into account. However, disclosures concerning My Partner Bank are included in the present statement of non-financial performance drawn up for the 2019 reporting period.

In consequence, **the overall data in the 2018 and 2019 statements will not be directly comparable.**

Note also that, with a view to optimising its presence overseas, on 2 March 2020 the Group acquired the Société Générale de Banque aux Antilles-SGBA, now Banque des Caraïbes. Since its acquisition, this new subsidiary has operated within the My Money Group system of governance and its strategic objectives, and respects its general policies on risk, compliance, audit, values and professional ethics. In parallel, the New Caledonia subsidiary Socalfi will be sold in the first half of 2020 to the group Société Générale.

As the present statement relates to the 2019 financial year, it will consequently include **all the operational entities included in the consolidation scope of My Money Group at 31 December 2019:**

- The credit institution **My Money Bank and its overseas subsidiaries (Sorefi, Socalfi and Somafi-Soguafi)**, approved as finance companies, and its **subsidiary MMB SCF**, a building society. The total workforce of My Money Bank and its subsidiaries stood at 726 at 31 December 2019; **the overseas subsidiaries (SOREFI, Socalfi and Somafi-Soguafi)**, with 284 employees, represent 39.12% of the total.
- The credit institution **My Partner Bank (formerly the Banque Espirito Santo et de Vénétie) and its subsidiaries**. Their total workforce stands at 128 employees. ●





3

Présentation de My Money Group



My Money Group (the "Group"), relying on a century of existence and know-how, has operated as an independent entity since its departure from the General Electric group. It is now affiliated with the private investment company Cerberus Capital Management L.P., founded in 1992 and based in New York. The Company manages funds and accounts worth more than 30 billion euros on behalf of many of the most respected investors in the world. The first US investment company to hold a banking licence in France, Cerberus Capital Management LP invests in several European markets, in Austria, Germany and the UK.

Since the end of 2018, following a period of transition during its change of share ownership, My Money Group has developed a growth strategy repositioned on its core activities.

My Money Bank, the historical operational bank in the Group, was born out of the purchase of SOVAC, founded by André Citroën, and of the Banque Royal Saint-Georges by the General Electric group (GE) in 1995 and 2004 respectively. It rapidly became a significant player on the debt consolidation markets. Its overseas subsidiaries have been present for nearly 50 years in La Réunion, Guadeloupe, Martinique, and Guyana and for almost twenty years in New Caledonia. As approved finance companies, they are acknowledged and vital players in the local economy through their business and consumer lending. Committed to optimising its overseas entities and strengthening its position in the historical markets in the French Antilles, on 2 March 2020 My Money Bank acquired the Banque des Caraïbes, a retail bank that was formerly a subsidiary of the group Société Générale, under the name Société Générale de Banque aux Antilles-SGBA.

“Acknowledged
and vital players
in the local
economy”



“To achieve excellence
in terms of regulatory
compliance
and customer
protection”





The Banque des Caraïbes is active in Guadeloupe, Martinique and French Guyana, offering a wide range of banking services to individual customers (everyday banking, loans, savings and insurance), professionals (everyday banking, loans, savings, cash solutions, advice and insurance), and businesses (everyday banking, financing, investment, international operations, and insurance). SGBA currently has five branches and three business centres, enabling it to serve some 17 000 customers.



By incorporating, at the end of 2018, the activities and know-how of the BESV group (now My Partner Bank), which specialises in corporate finance, My Money Group passed another milestone, at the same time strengthening its presence in its historical business lines. This external growth, allied to organic growth, enables the Group to preserve its independence in a market which tends to consolidate around large international players.

This acquisition, along with that of the Banque des Caraïbes, is also a means for the Group to disseminate its values and ethics even more widely.

To promote sound governance within the Group, the Boards of the various My Money Group entities have a duty, as well as determining the direction of the business and overseeing its implementation, to be the guarantors of a shared ambition: **to achieve excellence in terms of regulatory compliance and customer protection**. For this, My Money Group has chosen to adopt the strictest standards of governance, establishing, alongside the external audit committee, a risk and internal audit committee, an appointments committee, a remuneration committee, and, as of 2019, an ethics and governance committee. This **desire to go further than its strict regulatory obligations** is reflected in the Group's risk management policy: **a much higher solvency level than the standard regulatory requirement, a prudential approach to its liquidity, and excellent control of its cost of risk**.

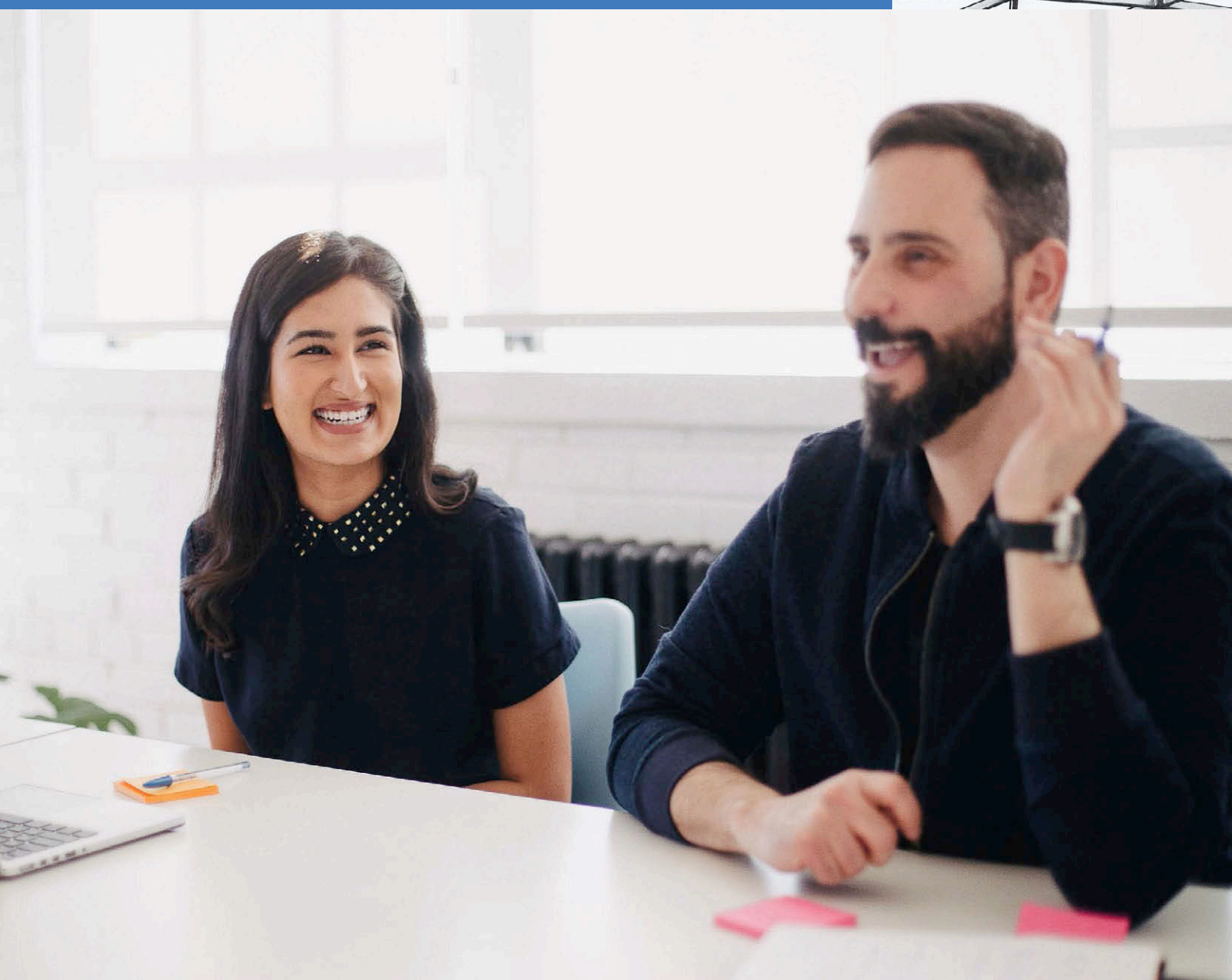
Whether in the financial or the non-financial field, all the companies within **My Money Group share standards of operational excellence, regulatory compliance and professional ethics**. These aspects are reflected in the values that guide the Group's administrators and employees in their day-to-day actions. ●



“The Group’s risk management policy: a much higher solvency level than the standard regulatory requirement,



a prudential approach
to its liquidity,
and excellent control
of its cost of risk "





4

What are the Group's values and identity?

My Money Group has drawn up a Code of Conduct set out in the document *Ce que nous sommes* ("**Who we are**"), which represents the collective vision of its employees. The Group's values and principles have been defined in a **collaborative approach**, inviting all employees, in mainland France and the overseas territories, to contribute. Respect for and commitment to these values by every managers and staff members are essential if the Group is to pursue its strategy for transformation and growth, simultaneously preserving the confidence of its customers, shareholders and society as a whole.

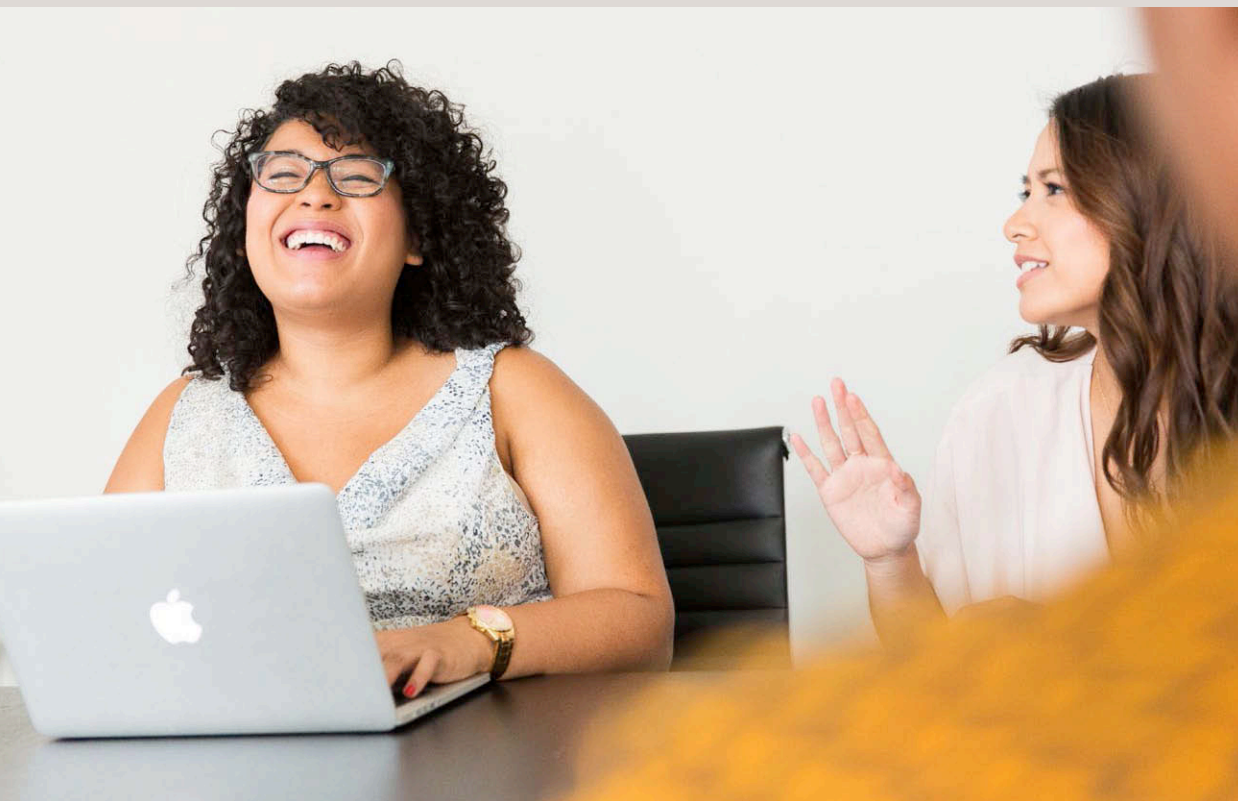
All employees, regardless of their position in the organisation, are responsible for **living up to and embodying the Group's values and principles in daily life**, internally and externally.

The Group also ensures that its **partners, suppliers and other external relations adhere to its values and principles** when they are working with its entities or on their behalf.

Setting out the Group's firm commitments in the Code of Conduct illustrates its desire to continue to be a responsible player, building its future and its successes on a solid basis of professional ethics and integrity. ●



“Living up to and embodying the Group’s values and principles in daily life”



adapt

- Managing change
- Being on the lookout
- Investing in talents and training



- Capitalising on our résultats-oriented culture
- Placing profitability at the heart of value creation
- Achieving and exceeding the company's objectives



perform

innovate

- Seizing each growth opportunity
 - Testing, sharing and deciding with agility
 - Innovating with our employees and customers



- Recognising our employees' commitment
- Communicating in full transparency
- Committing ourselves to respect and diversity

federate



02



**What is My Money Group's
business model ?** | Transparency
at the heart of the Group's model



1

A model that creates value

My Money Group ascribes great importance to creating value and sharing it among all its stakeholders.

By choosing its employees, partners and suppliers with rigorous care, My Money Group also ensures respect for its internal values in order to **contribute to the creation of a new financial industry consistent with a more responsible and fast-changing world.**

My Money Group, with its history, its expertise and its establishments, stands out as an **independent and reliable player** in the banking sector, specialising in finance and savings solutions for consumers and businesses both in mainland France and overseas.

By developing a niche market strategy, My Money Group stands out for its strong identity and an offer of products that meet the new expectations of customers.

Signalling its ambitions for growth, the Group continued its transformation with the acquisition of the banking group BESV (now My Partner Bank) at the end of 2018. This operation is in line with the policy of positioning in high value-added segments which the Group applies in all its business lines.

My Partner Bank is an independent player recognised for its finance expertise for real estate professionals, and also supports financial investors in their development and growth projects by provided structured finance.

The acquisition on 2 March 2020 of the retail bank Banque des Caraïbes will in turn enable the Group to strengthen its positioning in the Antilles and Guyana. Disclosures concerning the Banque des Caraïbes will be included in the statement of non-financial performance drawn up for the 2020 reporting period. ●



“Contribute to the creation of a new financial industry consistent with a more responsible and fast-changing world”





2

What are the Group's business lines?

My Money Group offers its finance and savings activities to both private individuals and businesses. Its growth is focused on the financing of the real economy both in mainland France and overseas, via a network of almost 700 business provider partners or directly to its customers. At 31 December 2019, lending activities represented outstandings of €5.2 billion. Total deposits in the savings branch amounted to €3.3 billion.

My Money Group's main locations are:

- Paris La Défense (PMMB-MMB-MPB registered offices) with more than 120 employees;
- Nantes (MMB Centre for Operational Excellence) with more than 300 employees;
- Antilles, Guyana, Réunion and New Caledonia, with more than 280 employees.

My Money Group is active in the following business lines:

1. DEBT CONSOLIDATION

A significant player in the debt consolidation business, My Money Bank provides consumers with a range of repurchase schemes for housing and consumer loans, with or without mortgage guarantee, and offers customised loan repurchase schemes (older people, independent professionals, life events, finance for new projects).

Debt consolidation solutions are available in France and overseas.



“A network
of almost
700 partners”





2. PROFESSIONAL REAL ESTATE FINANCE

As a recognised partner providing short-term financing for real estate professionals, My Partner Bank is active in every market segment: property dealers, renovators, promoters, constructors and land developers.

3. STRUCTURED FINANCE

As a traditional player in the private equity segment, My Partner Bank has 20 years' experience in leveraged buy-outs, supports its customers in structuring securitisation transactions and also offers custodian services for securitisation mutual funds.

4. SAVINGS DEPOSITS

Deposit-taking enables My Money Bank and My Partner Bank to meet their banking licence obligations, but also contributes to the refinancing of their lending activities.

My Money Bank offers a range of high-performance savings products intended for private individuals and professionals:

- term accounts;
- interest-bearing savings accounts (available to private individuals and non-profit organisations).

My Money Bank relies on numerous partnerships with independent asset management advisers (CGPI) and on its internal teams for the distribution of investment offers. Currently the savings products are available in mainland France and in Germany through **a partnership with a FinTech**.

My Partner Bank has a competitive range of term accounts and current accounts meeting the cashflow management needs of its customers. The investment solutions offer an essential alternative for safe and accessible savings:

- term accounts for individual customers (in Germany and Spain via a FinTech) and for professionals (in France, Belgium and Luxembourg);
- demand accounts for professionals, suitable for SMEs and mid-tier companies;
- interest-bearing current accounts for professionals, suitable for corporates and institutional players.



5. VEHICLE FINANCE

A major operator in point-of-sales financing for vehicles, with its overseas subsidiaries, Sorefi in Réunion, Somafi-Soguafi in Martinique, Guadeloupe, and Guyana, and Socalfi in New Caledonia, My Money Group offers the following services through the intermediary of its distributing partners:

- consumer solutions in credit sales and leasing with a purchase option;
- solutions for business and professionals, with a range of products enabling decision-makers to carry out the investments essential to business growth: industrial and agricultural equipment, IT and office equipment, transport, handling, building and public works, vehicle fleets (credit sales, leasing and defiscalised products).

6. CONSUMER CREDIT

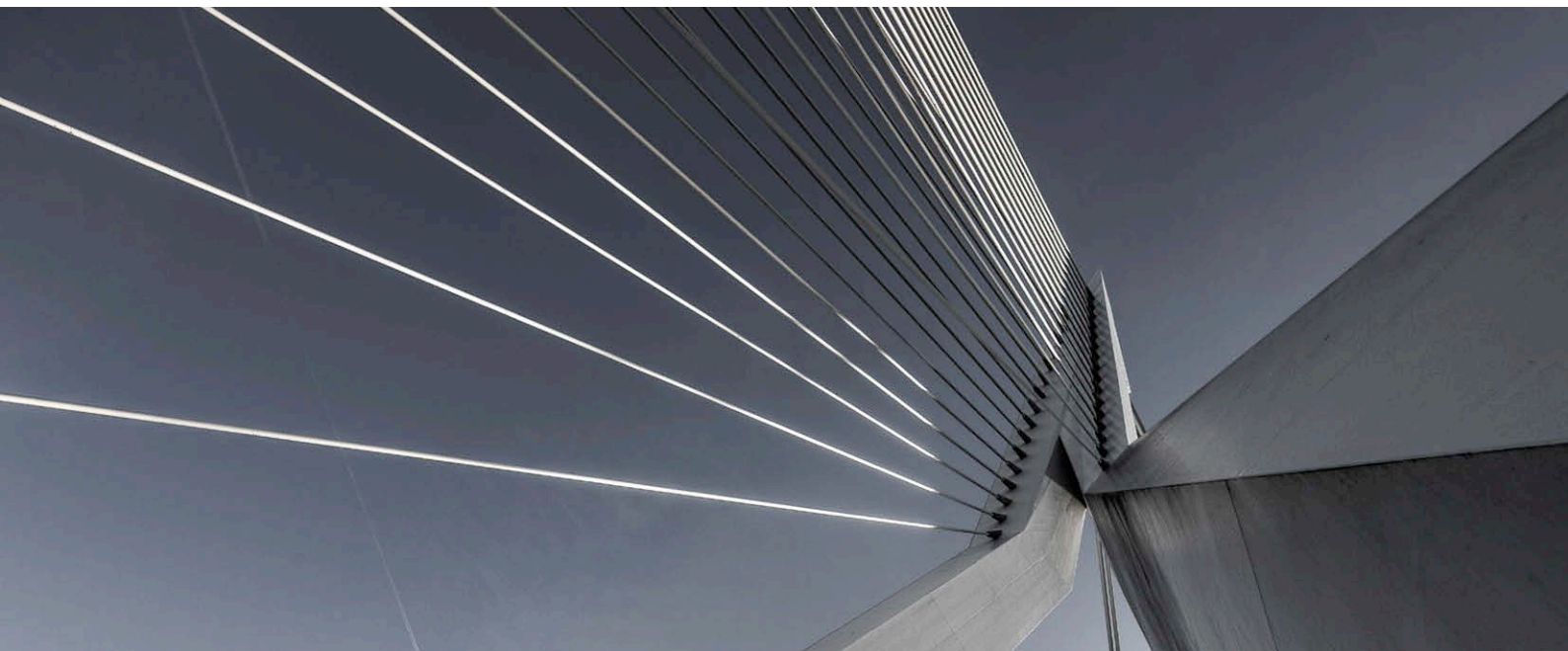
Overseas, My Money Group offers a range of personal loans to satisfy the needs and projects of its private customers:

- motor vehicles;
- household appliances;
- works;
- travel.

7. INSURANCE POLICIES

As an insurance broker, My Money Group offers insurance policies and additional optional services to support its financing for private individuals and business:

- borrower's insurance;
- financial loss insurance;
- a mechanical breakdown and assistance guarantee (repairs, towing assistance, replacement vehicles). ●





3

How is My Money Group integrated in the banking industry?

My Money Group is active in the banking industry, specialising in finance for private individuals and businesses overseas as well as debt consolidation, deposit-taking and business real estate finance in mainland France.

This scope of activity constitutes a specific segment in the French banking and finance industry.

In terms of competition, this segment is shared between large French banking institutions operating through subsidiaries devoted to these activities, and specialist independent players such as My Money Group in mainland France and/or overseas.

My Money Group's particular geographical locations, due to its background in the overseas departments, therefore makes it more difficult to conduct a strategic and competitive analysis.

1. ACTIVITIES IN MAINLAND FRANCE

- **Debt consolidation is a very specialist segment on which My Money Bank has partly based its reputation.**

A major historical independent player at the national level, My Money Bank justifies its specialist status in this segment.

By offering private individuals debt consolidation solutions both with and without a mortgage guarantee, My Money Bank meets the needs of a larger customer base than some of its direct competitors.

- Professional real estate finance is offered by very many banking institutions. My Partner Bank stands out from its competitors through its consultancy expertise, enabling it to support its customers in implementing innovative and high-performing packages. Its rapid performance, its expertise and the quality of its service make it a recognised market player for professionals in the sector.





- Deposit-taking is an activity dominated by the major national and international banking networks. The companies My Money Bank and My Partner Bank, which carry out this business on behalf of the Group, offer deposit products, and the growth of this business line demonstrates the growing market interest in its products. My Money Group's savings products are marketed both directly and through a network of specialist partners in France and abroad. A strategic activity for the financing of its banking Group, deposit-taking is likely to expand significantly in future years to support the ambitions described above.

2. ACTIVITIES OVERSEAS

- Consumer credit is a market shared between generalist banking institutions acting through dedicated subsidiaries and specialist players such as the Sorefi, Socalfi and Somafi-Soguafi entities. The consumer credit segment is strongly correlated with the level of household consumption. The overall rate of household loans in France stabilised in 2018 at 47.8% with 8.5 million households taking out a new loan during the year. With a wide range of consumer loans, the overseas subsidiaries support their customers to finance equipment purchases and personal events, and have become leading players, recognised by local households.
- Lending to professionals, mainly for professional equipment, is to a great extent linked with the regional growth of businesses.

In the overseas departments, because of their historical involvement and their strong commercial activities, **each of My Money Group's entities is a major player, with a local market share of more than 20%.**

Thanks to their local presence, the subsidiaries are familiar with the particular nature of their markets. This means that they can offer adapted products, and provide flexible support to their finance customers, not least in the event of the extreme climate events which occur in these geographical areas.

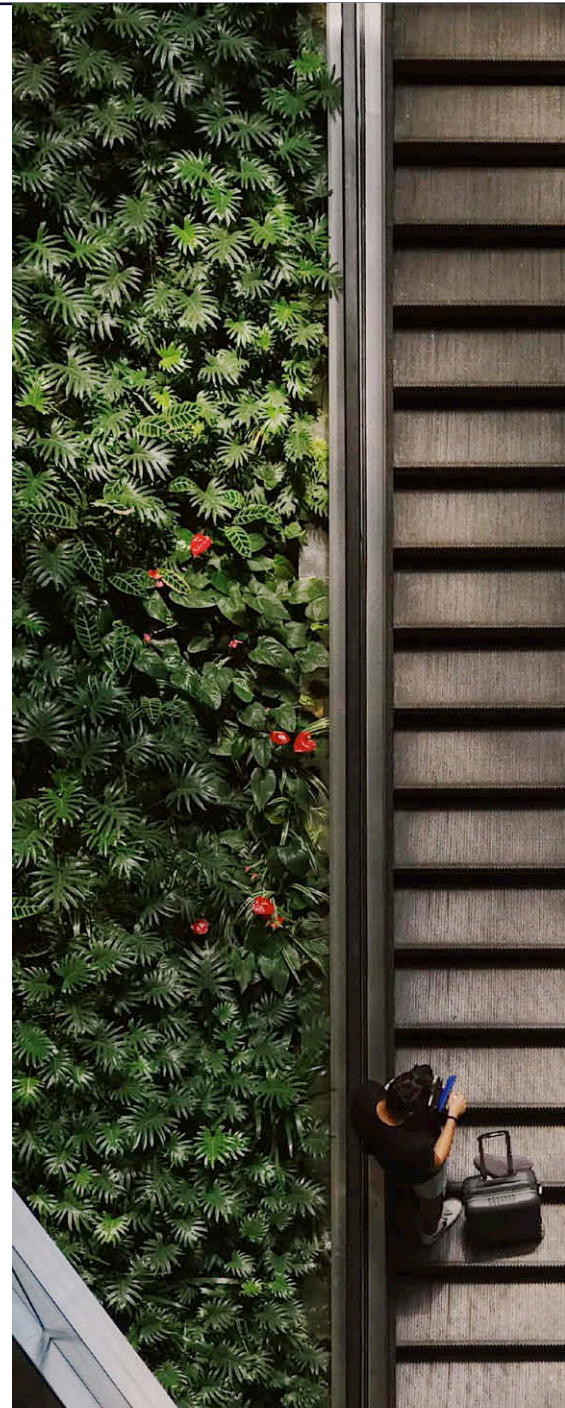


In the various markets discussed above, the Group faces the disruptive emergence of FinTech players, as do all its competitors. This name covers innovative enterprises which, using the new technologies, are reshaping banking and finance offers and consumer habits.

A study of management teams in the financial services sector, conducted in late 2018 by specialist consultants Vuelta and entitled "The Future of Financial Services: Planning for Every Eventuality", identifies five challenges and sources of disruption facing the finance industry over the next five years.

Cybersecurity leads the way with 42% of responses, followed by political change (39%), regulation and compliance (36%), data management and confidentiality (31%), and planning and market uncertainty (20%).

In response to the challenges represented by the new technologies in terms of both implications and risks, **My Money Group has been conducting a controlled technological shift over the past two years. It is a responsible, modern digital player in a fast-changing industry.** ●





4

What are My Money Group's strategic prospects?

My Money Group has identified six strategic imperatives for its development over the next three years in order to optimise the operations of its subsidiaries and grasp the opportunities for acquisitions in partnership with its shareholder Cerberus.

1. PURSUING BALANCE SHEET GROWTH IN ORDER TO ACHIEVE A CRITICAL SIZE

Balance sheet growth is important in order to offer the best investment prospects and to optimise the Group's profitability. Balance sheet growth is based on three axes:

- the growth of existing activities;
- expansion of the range of products and services provided;
- external growth.

Since late 2016, the Group has refocused on its core business activities, primarily in mainland France, leading to the sale of its home financing business (in November 2016), consumer credit (in April 2017) and car loans (on 1 June 2018). The simplification of My Money Bank portfolios led to a reduction in the balance sheet, from €12 billion in 2008 to €4 billion in 2017. Similarly, the strategy of My Partner Bank (formerly BESV), acquired in late 2018, has focused its activities on professional real estate and structured finance, and on winding up its private management business.

Since the end of 2017, as demonstrated in its acquisitions of My Partner Bank (formerly BESV) in late 2018 and the Société Générale de Banque aux Antilles (early 2020), My Money Group has acted to grasp opportunities for external growth that meet the following priorities:

- investing in operations that complement the activities of the existing business;
- upscaling the Operational Excellence Centre in Nantes, which specialises in debt consolidation;



- continuing the diversification of financing sources and expanding the deposit-taking programme;
- acquiring technology by investing in the FinTech area.

2. INTENSIFYING ORGANIC GROWTH BY EXPANDING THE PRODUCT RANGE

My Money Group hopes to supplement and enrich its product range by developing the following products:

- Commercial lending;
- Structured finance;
- Personal loans;
- Savings and payment products;
- Complementary insurance products.

3. DEVELOPING A COMPETITIVE FINANCING CAPACIT

During the course of 2019, My Money Group continued to improve its refinancing conditions and capacity. Its resources are today constituted of a mix of securitisations (public and private), deposits and treasury bills. Between now and 2021, My Money Group hopes to maintain and continue to diversify its deposits programme. In parallel, the building society MMB SCF, founded in 2018, launched four new issue of mortgage bonds in 2019, (including one public issue for €500 million) with the aim of refinancing the mortgage lending activities. These measures will contribute to the reduction of its finance costs and the diversification of the resources employed.



“An ambitious programme of systems modernisation and technological change ”



4. IMPROVING THE OPERATING RATIO

Continuing the reduction in overheads conducted over the past two years, My Money Group will continue to optimise its costs structure through:

- the simplification of the business and the sale of non-priority assets;
- investment in technological modernisation;
- balance sheet growth, generating a better absorption of structural costs.

5. INCREASING PROFITABILITY (RETURN ON EQUITY)

Profitable growth is a key requirement for My Money Group. It pays close attention to the following aspects:

- rigorous pricing,
- competitive financing costs,
- the development of ancillary income,
- constant control of the credit risk,
- scale efficiencies and the optimisation of structural costs.

6. BUILDING VALUE THROUGH INNOVATION AND TECHNOLOGY

Since 2018 My Money Group has conducted **an ambitious programme of systems modernisation and technological change** to promote the satisfaction of its customers, partners and employees.

In this way, to diversify its portfolio and digitalise its offer, My Money Bank has entered into **partnership with the FinTech "Cashbee"**, targeting consumers and supporting their savings projects. Cashbee is used to link the user's current account with a My Money Bank interest-bearing savings account.

Through this partnership, My Money Bank benefits from Cashbee's innovative digital technology while increasing the number of individual savers in a competitive market. ●



03



What are the Non-financial risks and challenges? | Operating in a changing world

1

The Group's employment considerations

My Money Group has more than **800 employees** since the acquisition of the Banque Espirito Santo et de la Vénétie (BESV), now My Partner Bank.

Human resources remain at the heart of the Group's concerns, and represent a key challenge, particularly in light of the technical nature of its business and the strict regulatory requirements.

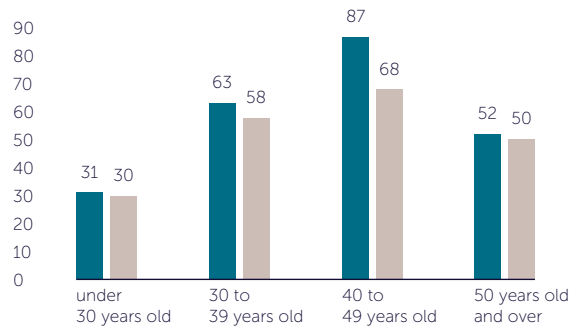
By deciding to give the human element a central place in its identity and values, the Group is endeavouring to position itself as **an independent and responsible banking industry player, respectful of its employees** and of its customers and partners.

As a player committed to its sector, My Money Group is developing and disseminating its values both internally and externally.

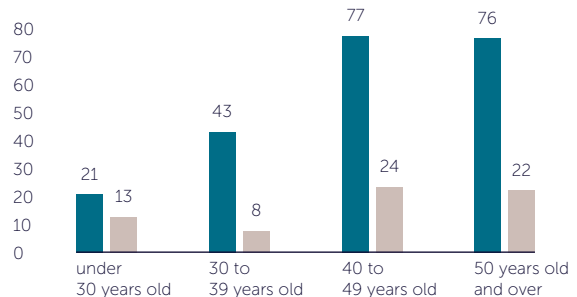
Guided by the need to provide its customers with high-quality support, the Group chooses and trains its employees rigorously to meet these high standards.

The graphics below give a brief outline of the composition of the Group's staff.

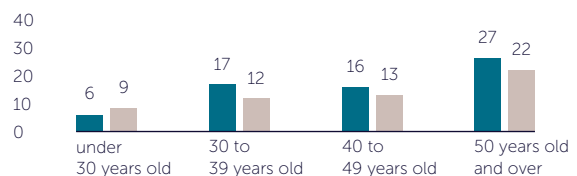
■ Female
■ Male



MY MONEY BANK
TOTAL HEADCOUNT AS OF 31 DECEMBER 2019: 439



MY MONEY BANK OVERSEAS SUBSIDIARIES
TOTAL HEADCOUNT AS OF 31 DECEMBER 2019: 284



MY PARTNER BANK
TOTAL HEADCOUNT AS OF 31 DECEMBER 2019: 122
(student-apprentices excluded)

The study of the employment risks and challenges faced by entities in the Group consequently consists of three parts:

A Attracting and retaining talent

B Employees' commitment

C Risks associated with diversity and equal opportunities

1 WHAT IS THE GROUP'S RECRUITMENT POLICY?

A How does the Group attract and retain talent?

By ensuring its status as an attractive employer in its market, the Group can attract new talent to support the growth of its business. Thanks to an **ambitious training policy**, the Group supports its employees in the acquisition of new skills. In an industry subject to significant turnover, it is essential to retain existing employees and support them throughout their careers.

In 2019, My Money Bank recruited 62 employees on permanent contracts and 3 on fixed-term contracts. The overseas subsidiaries have recruited 15 employees on permanent contracts and 4 on fixed-term contracts, while for My Partner Bank the figures are 23 and 5 respectively. Because of the technical nature of its business and its ambitious growth targets, preserving the **diversity and quality of the profiles** is a real recruitment challenge.

In 2018 My Money Group developed and launched its **first graduate programme: "My Leadership Program"**, focusing on finance. This is a two-year programme consisting of four rotations in different positions, and potentially in different Group entities. Programme members receive training in the areas of finance, business and leadership. They benefit from **dual mentoring, with an operational manager and a programme manager**, and undergo an assessment at the end of each rotation.

The three employees joining My Money Bank through this programme in early 2019 have completed their rotations within My Money Bank and My Partner Bank, and taken specific training.



2 WHAT IS THE GROUP'S RECRUITMENT POLICY?

As lead company in the Group, Promontoria MMB establishes the remuneration policy applicable to all employees, based on the recommendations of the Remuneration Committee and the regulatory provisions on salary structures.

Banking institution status is dependent on respect for many legislative requirements in the matter of remuneration, particularly since the 2008 financial crisis.

The Group remuneration policy has the following main objectives:

- ensuring that individual interests are congruent with the economic strategy, long-term interests and values of the Group;
- **retaining employees** by appropriate remuneration;
- **discouraging employees from taking excessive risks, by avoiding conflicts of interests;**
- for employees whose activities may have a significant influence on the risk exposure of a Group entity, defining measures to align methods for the determination and payment of risk-related remuneration;
- remunerating employees conducting control activities based on the specific objectives of these missions.

The remuneration policy can be accessed on the Human Resources departmental intranet, where it can be consulted by all employees.

The annual wage settlement programme and the bonus scheme, after approval of proposals from managers, are validated by the Human Resources department and the Group's general executives. The bonus scheme is then submitted to a vote the remuneration committee and by the Board of Directors.

At least once a year, when the wage settlement programme is drawn up, the HR department conducts a survey of salaries to ensure internal fairness and consistency with the market.

During the mandatory annual salary negotiations, My Money Bank and its subsidiaries allocated a budget for increases equivalent to 1.3% of the wage bill, reserved for merit rises on the basis of performance. Around 80% of employees received a salary rise in this way in 2019.

Turning to the policy for smoothing of the pay gap between women and men, My Money Bank signed a **company-wide agreement on the professional equality of women and men in June 2019**, extending previous agreements. This agreement includes measures intended to reduce the pay gaps.

For My Money Bank, the results of the equal pay policy are unequivocal, and are reflected in a professional gender equality index of 91 points out of 100 in the 2018 financial year.



3 WHAT IS THE GROUP'S STRATEGY TO RETAIN AND GROW TALENT?

Convinced that prospects for advancement within its various entities contribute to the retention of talent, My Money Group regularly shares its results, structuring projects and strategy with its employees **in a transparent manner**.

For example, in November 2019, around a hundred of the Group's leaders were invited to a three-day leadership meeting in Chantilly, which saw seminars and discussions on the results, strategy and other current topics.

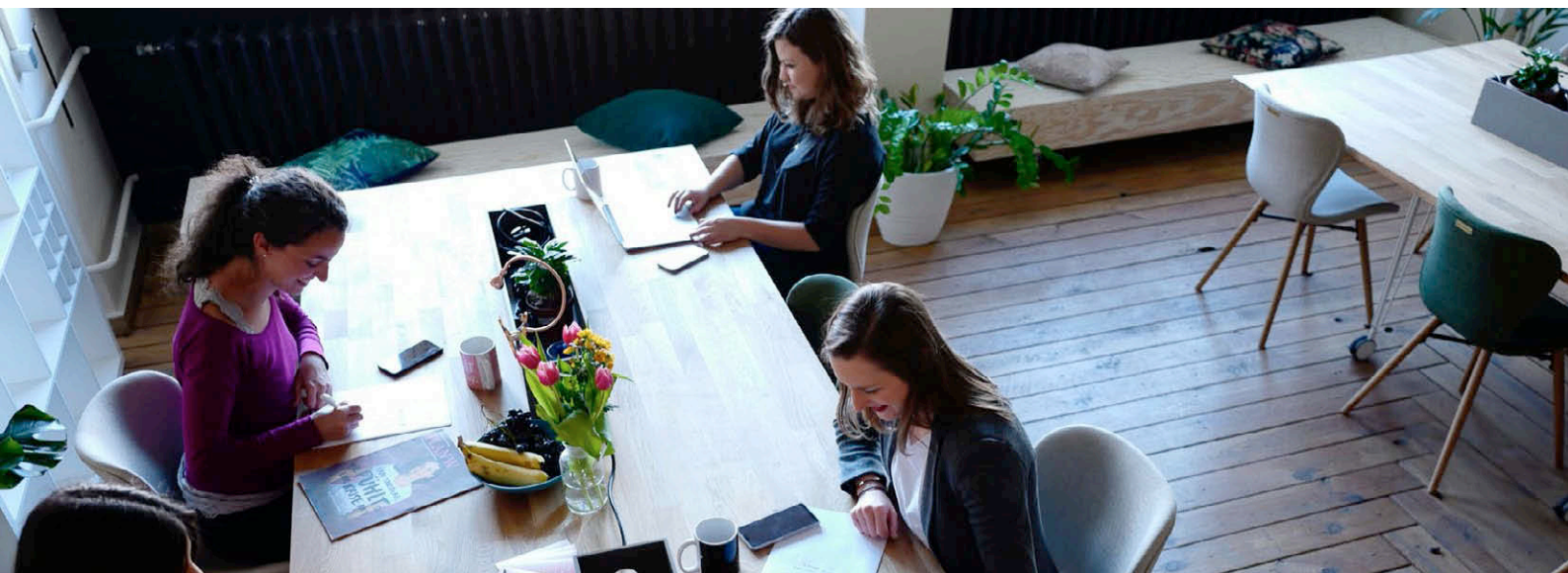
These working sessions were punctuated by convivial interludes, informal exchanges and team building, contributing to the synergies between the different Group entities.

In order to remain competitive, My Money Group regularly ensures that salary packages remain in line with the market.

In the belief that recognition is a strong element in employee retention, the Group acknowledges the exceptional contributions of some employees by making awards. More than 100 employees received such awards in 2019. For its part, My Partner Bank made 37 awards.

In September 2019, My Money Group introduced a new system of internal classification, both in mainland France and in the overseas departments, based on objective criteria communicated to all its staff. This classification consists of seven levels known as "grades" and enables all employees to identify the position of their roles in the organisation, facilitating internal mobility within the different functions and entities of the Group, and giving prospects for career development.

Another way of limiting turnover and retaining talented employees is by supporting them in their career development.





“Prioritise day-to-day training as an accelerant for cultural transformation, and boost change management skills”





4 WHAT IS THE EMPLOYEE TRAINING AND SUPPORT OFFERED BY THE GROUP?

For several years, My Money Group has taken a strategic approach to the identification of the issues involved in employee development and the preparation of an appropriate training policy.

In order to develop the skills needs for new jobs, new technologies and organisational change, in 2019 the Group decided to prioritise **day-to-day training** as an accelerant for cultural transformation, and to **boost change management skills**.

Continuing the work begun in 2018, and with the aim of reflecting the new strategic issues facing the banking industry, the Group wanted to **make 2019 the year of a learning enterprise approach** in which employees are actively involved in their own development, with training areas focusing on skills.

To achieve this ambition, the Group allocated a budget of **over €660 000 to training**. It has also invested in new IT tools designed to optimise training programmes and follow-up of its policy. For example, more than **1 300 training** initiatives and **15 000 hours** were delivered to more than **700 employees** in 2019.

By comparison with the previous financial year, My Money Bank has maintained its €400 000 training budget and delivered more than 8 900 hours of training in 2019 compared with 3 122 hours in 2018, with more than 1 200 training initiatives and 366 employees trained.

In this way, changes within the Group were initiated **directly by the teams**, through social dialogue, individual employee support and cross-cutting measures reflecting the strategic focus. By enabling employees to **co-create** and discuss their training needs with managers during their mid-year interviews, the manager puts employees at the heart of their development and can list the training needs of his team during launch campaigns. This learning enterprise dynamic encourages the adaptation of employees to changes.

Further, by incorporating a greater **diversity of media** and addressing a wider range of subjects, the internal training offer is expanding continuously. Employees thus have access to long and short courses, **face-to-face courses, MOOCs and e-learning**. These new learning methods introduce and promote day-to-day training.

In parallel, employees benefit from cross-cutting training measures linked inter alia with the cultural and organisational change conducted in 2019. In this context, training courses were delivered addressing the **agile method, UX Design, the collective dynamic, becoming an 'intrapreneur', and the business model** (managers).

My Partner Bank's skills development plan mainly focuses on regulatory training, since the company was in the midst of change. The €100 000 budget was not fully used, but training is one of the priorities for 2020.



2 PERFORMANCE REVIEWS AND CONTINUOUS EVALUATION

B What is the Group employees' commitment?

Although the Group belongs in an increasingly automated industry, its image and its expertise mainly depend on employees commitment, in particular through the following:

1 DISSEMINATION AND OWNERSHIP OF THE GROUP VALUES

In order to continue to secure the values of the Group, all new recruits receive a copy of the code of conduct entitled *Ce que nous sommes* ('Who we are'), which restates and clarifies these values, illustrating them with concrete examples.

The values are framed and displayed on all the sites, in the corridors and meeting rooms, so that they are part of the everyday environment for the staff.

In January 2019, My Money Bank introduced a new performance monitoring tool for its entities in mainland France and overseas: TalentSoft.

Throughout the year, employees have been able to take workshops promoting ownership of the tool, and to be supported by a detailed guide to its use.

TalentSoft is used to set annual targets. It enables both employees and managers to keep a running record, throughout the year, of an employee's outputs, and to record progress towards the achievement of targets. TalentSoft is also used for the mid-year performance reviews, with a dedicated form for this purpose. Finally, at the end of the process, the form completed by the employee and that completed by the manager are consolidated to provide just one of the bases of the discussion they will have during the annual review.

In short, the tool promotes exchanges between the employee and the manager throughout the year, providing a **continuous assessment of performance**. It also makes it possible to adapt targets where applicable, identify the resources necessary to achieve them, draw attention to any need for improvement, take note of training needs and mobility requests, and finally confirm the annual review.

In 2019, **99% of employees** defined and recorded their targets in TalentSoft, and **92% of mid-year interviews** were conducted in the period set.





3 MAINTAINING SOCIAL DIALOGUE AND SETTING UP COLLECTIVE AGREEMENTS

My Money Bank employees are covered by the banking collective agreement (IDCC 2120) and by agreements negotiated within the company. Its subsidiaries are covered by the finance company collective agreement (IDCC 478).

The Group gives great importance to the quality of social dialogue, which is reflected in constructive meetings with employee representative bodies. Regular discussions take place with the ESC and trade union representatives.

For example, My Money Bank organised 29 meetings with employee representatives (not including meetings for negotiation) in 2019.

My Money Bank set up its economic and social committee (ESC) in November 2019. All the Group's entities now have an ESC.

In 2019, My Money Bank and its subsidiaries negotiated and signed several company agreements with trade union organisations, covering areas such as remuneration, professional equality, the quality of life in the work place, incentive schemes or the introduction and operations of the ESC.

4 GUARANTEEING EMPLOYEES' HEALTH AND SAFETY

4.1 HOW DOES THE GROUP PROTECT ITS EMPLOYEES HEALTH?

Prevention of risks to employees' health and welfare at work

The single document assessing professional risks and the annual programme for preventing professional risks and improving working conditions are reviewed at each meeting of My Money Bank's health, safety and working conditions committee, in order to ensure that any measures identified are taken promptly and to react fast if necessary.

The company My Money Bank launched an initiative on the quality of life at work in 2017, continued in each year, and which it wished to confirm through an agreement in 2019. Inter alia, it drew up an **open space charter**, listing the 10 golden rules for working harmoniously in open areas.

Psychological support and counselling

Since 2013, My Money Bank has offered its employees psychological support and counselling provided by Eléas consultancy, specialists in the management and prevention of psychosocial risks and the quality of life at work.

This is a **preventative tool** which takes account of the psychological aspects of health and offers employees neutral, caring, confidential and anonymous **counselling and support service**.



The aim is to provide support and guidance to the people who call on the service, with an emphasis on a proactive solutions-focused approach designed to defuse tensions.

Special support is provided to managers, including advice in the management of unexpected destabilising situations (team conflicts, traumatic events, etc.).

The main characteristics of this scheme are the following:

- It is accessible at all times and free of charge from any telephone, 24/7, by calling a dedicated My Money Bank number;
- All calls are guaranteed confidentiality and anonymity;
- Care is immediately provided by a qualified clinical psychologist with extensive experience of counselling, support and the management of psychosocial risks;
- Treatment of individual problems whether personal or professional.

4.2 HOW DOES THE GROUP ENSURE ITS EMPLOYEES' SAFETY?

The Group's entities have key contacts organised around the crisis management officers present on each site.

For example:

- The Europlaza Tower, in compliance with the high-rise buildings regulation (*Immeuble de Grande Hauteur, IGH*), has a security and monitoring post that is active 24/7. In permanent operation, it ensures security in the building thanks to fire detection and firefighting equipment. A number of volunteers have been trained in the use of fire extinguishers to prevent the ignition of a fire, and in the procedure for evacuating the premises to ensure the safety of other employees. An annual drill is organised by the Tower's security officer, in coordination with the officers responsible for general services for all the tenants in the building;
- The two buildings on the Nantes site of My Money Bank are subject to the regulations on buildings accessed by the public (*Etablissement Recevant du Public, ERP*). Each has fire detection equipment linked to an alarm control unit supervised by a monitoring service which, in the event of an alarm, implements measures defined in consultation with My Money Bank in order to cover working hours and out-of-hours periods.

The annual regulatory checks (electricity, detection, fire, extinguishers, air extraction, etc.) are carried out, and follow-up is recorded in the security record held on each site.



In 2019, My Money Bank completely revised its internal regulations, to which are appended the code of conduct and the IT charter. These documents, which include the health and safety rules, have been addressed to all employees. They are issued to all newly recruited employees, service providers and temporary employees. They can also be consulted on the company intranet. Overseas entities will shortly adopt the same internal regulations, after adaptation to local conditions. My Partner Bank is also finalising the new version of its internal regulations.

5 IMPLEMENTING NEW MEASURES TO SUPPORT GENERAL EMPLOYEE WELFARE

The existing collective agreements, particularly those concerning professional equality and the quality of life at work, contribute overall to the general employee welfare.

5.1 WHAT ARE THE GROUP'S INITIATIVES REGARDING THE PREMISES?

The measures in the risk prevention plan and maintenance of the working premises contribute to maintaining pleasant working conditions, and improving them as much as possible.

In late 2019, some IT department staff were moved into the fully renovated premises in the Europlaza Tower which have been adapted to "agile" working.

The Nantes premises are regularly maintained. The Alaska building was completely renovated in 2019, including a change of furnishings.

The overseas entities also have recent premises providing a modern, adapted working environment. The oldest of the sites, which is in Martinique, will transfer in February 2020 to entirely renovated new premises.

My Partner Bank has left its historical site in the 15th arrondissement of Paris to join the Group's head offices at La Défense. Since December 2019, all its staff have been working from the Europlaza Tower in entirely renovated premises equipped with new furnishings.



“Fully renovated premises which have been adapted to ‘agile’ working”





5.2 THE ANONYMOUS EMPLOYEE OPINION SURVEY

In October 2019, My Money Bank and its overseas subsidiaries launched an opinion survey using the "Supermood" tool, in order to enable all employees to express their views on given topics regularly under the cover of anonymity.

A 10-question audit, with a participation rate of around 60%, has enabled the entity to identify some aspects of individual engagement and job satisfaction. After publicising the results of this audit, a micro-survey was launched on one of the themes that emerged: **recognition**.

The responses will be used to develop and implement an action plan. Every month, employees will continue to complete micro-surveys on the topics that matter to them. My Partner Bank will launch this initiative in 2020.

C What are the diversity and equal opportunities?

1 WHICH MEASURES DID THE GROUP UNDERTAKE TO PROMOTE PROFESSIONAL EQUALITY?

In 2011, My Money Bank signed its first agreement on gender equality, followed by a new agreement in 2015 and a third in 2019, with the aim of taking action in the five following main areas:

1.1 RECRUITMENT

A single internal and external recruitment process applied in the same way whether candidates are women or men. Recruitment is based on the same **objective criteria**: skills, professional experience, training and qualifications. For applicants with the same profile and for the same position, the Group undertakes to guarantee strictly identical recruitment conditions for women and men, in particular in terms of remuneration and classification level.



1.2 ONGOING PROFESSIONAL TRAINING

Because it considers ongoing professional training to be a determining factor for ensuring equality in career advancement and professional development, the Group guarantees equality of access to all employees, women and men, to both ongoing professional training and to the vocational training account scheme.

1.3 CAREER DEVELOPMENT

With a guarantee of equal access for women and men to promotion and/or mobility, and an undertaking to take account of the career development wishes of women and men in strictly identical fashion.

1.4 REMUNERATION

With an undertaking to work to reduce the pay gap between women and men. The agreement provides for measures to neutralise the remuneration impact for employees on maternity or adoption leave.

1.5 PARENTHOOD

With special monitoring for employees on maternity, adoption, or parental leave by HR officers and managers, including anticipation of leave and preparation for return.

2 WHICH MEASURES DID THE GROUP UNDERTAKE TO INTEGRATE AND RETAIN EMPLOYEES WITH DISABILITIES?

The Group is continuing its policy of retaining in employment and identifying employees who are recognised as disabled workers, and of helping those who wish to obtain such recognition. Naturally, it ensures the effective implementation of reasonable adjustments to their positions.

In 2019, My Money Bank recognised eight employees as disabled workers for the purposes of the mandatory declaration on the employment of disabled workers (DOETH). The overseas subsidiaries declared four such employees and My Partner Bank three. ●



2

My Money Group's social challenges

In the modern economy, the role of banks as institutions and **trusted partners** has continued to gain salience. The banking industry is therefore facing a steep rise in regulatory constraints dictated by the aim of protecting markets and customers, including the General Data Protection Regulation (GDPR), and new regulations for the fight against money laundering and the financing of terrorism.

A regulated player by reason of its business activities, My Money Group is committed to conducting its business in compliance not only with the laws and regulations, but also with its own ethics and values. Finance for private individuals is the subject of increased attention terms of consumer protection.

Acting as a responsible player in a way that extends beyond mere legal and regulatory obligations, the Group has established a code of conduct that offers all employees an ethical framework to help them steer their actions and take the right decisions.

This document, issued to all new employees on recruitment, serves as a basis for the communication measures and awareness-raising initiatives conducted internally by My Money Group's different entities.

From it derive the detailed procedures for the operational application of the practices set out in the Code of Conduct. They are accessible to all employees on the Group intranet or on request from managers.

My Money Group must also address the **massive phenomenon of digitalisation**, reflected both in the digitalisation of banking and financial services and in the changed expectations of customers, who demand a faster and more personalised banking relationship.

A source of both risks and opportunities, digital is bringing profound changes to the banking market. By adapting and reinventing its tools, My Money Group is taking a **modern, pro-active approach**.



This survey of the social risks and challenges facing the Group's entities is divided into two parts:

A How the Group ensures a responsible distribution of its products

B How the Group protects data and ensure cybersecurity

1 BY RESPECTING EXISTING AND FUTURE REGULATION

A How does the Group ensure a responsible distribution of its products?

Given its regulated activities, My Money Group is exposed to political and regulatory changes and attaches great importance to compliance with the framework in which it is developing.

With its multi-site presence, My Money Group is active in mainland France and in the overseas departments (Réunion, Martinique, Guadeloupe, French Guyana) and New Caledonia. The Group's activities are therefore likely to be impacted not only by regulatory changes or national political decisions but also by local decisions taken within the jurisdiction of the overseas departments and territories.

As a genuine partner of economic development in the overseas departments and territories, demonstrating a responsible commercial policy that respects consumer rights, My Money Group enjoys **relationships of trust** built up with local authorities.



2 BY IMPLEMENTING MEASURES TO REDUCE THE COMPLIANCE RISK

2.1 THE GROUP'S ACTIONS REGARDING GOVERNANCE

My Money Group has appointed a compliance director and compliance officers in its subsidiaries, charged with identifying, preventing and measuring compliance risks.

The compliance director reports directly to the CEO of Promontoria MMB. This reporting line guarantees the necessary independence and resources for the mission. His role includes defining and applying the procedures within his remit, and contributing to the dissemination of a compliance culture within the Group.

As a member of the executive committee, he also **plays a role in advising** all employees, and submits a periodic activity report to the Group's risk and internal audit committee or to the boards of subsidiaries.

The compliance officers in the subsidiaries report to him directly.

2.2 RISK MAPPING AND ESTABLISHING THE ANNUAL CONTROL PLAN

The annual compliance plan and the annual control plan are established on the basis of risk mapping, including the compliance risk. Given the activities of My Money Group and its subsidiaries, the main compliance risks concern the regulatory provisions for :

- the prevention of money laundering and the financing of terrorism,
- the prevention of corruption,
- customer protection and the protection of personal data.

These inherent risks are nevertheless mitigated by control measures that result in a limited residual risk.

The risk control measures rely on existing procedures and the internal control system. They are reinforced thanks to increased employee awareness of the values of My Money Group and its code of conduct. Finally, the **culture of compliance** is transmitted by the executive management and the compliance department, and through the importance ascribed to training.

The compliance risk, like the other risks to which My Money Group and its subsidiaries are exposed, is **assessed every quarter** on the basis of indicators that are set and revised annually. This is the **Risk Appetite Statement Assessments**. Assessments for the year are satisfactory.



3 REGULATORY MONITORING

Legal and regulatory monitoring is a critical measure in order to ensure the constant compliance of My Money Group's activities.

Regulatory monitoring was strengthened in 2019 for My Money Bank and the entities in overseas departments by formalising a procedure and establishing a regulatory monitoring committee, reporting to the compliance committee and chaired by the chief legal officer. A referral network is used to ensure bottom-up and top-down communication.

At My Partner Bank, monitoring is provided jointly by the legal department and the compliance department.

4 SETTING OUT A TRAINING POLICY

My Money Group has set out a training policy for all employees which is more intensive for the most exposed employees, particularly those working with customers and distributors. These training courses are delivered via e-learning or face-to-face.

Particular training efforts are also made for compliance department employees engaged in financial services or following specific training courses. They contribute to regulatory monitoring and conduct shared impact analyses during meetings as part of ongoing training. **In 2019, three employees in the compliance department obtained AMF certification.**

5 ESTABLISHING AN INTERNAL CONTROL SYSTEM

The internal control system, established in accordance with the order of 3 November 2014 on the internal control of businesses in the banking sector, guarantees the independence of controllers and operates at three levels (first level, ongoing, and periodic controls). These controls cover all the Group's activities. They are carried out automatically, or by dedicated controllers in the various departments of each subsidiary.

The **annual control plan** is established on the basis of risk mapping. Depending on the risk identified, it provides for the definition of the controls, their frequency and sampling. It is validated by the executive management. Control results and corrective measures are followed up and referred to the ad hoc committees.

As banking institutions, My Money Bank and My Partner Bank, and the overseas entities in the capacity of finance institutions, are overseen by the supervisory authority ACPR. My Partner Bank, as an investment services provider, also falls under the supervision of the market regulator AMF.



6 APPLYING ETHICS AND PROFESSIONAL CONDUCT RULES TO PRODUCT DISTRIBUTION

My Money Group has a **zero-tolerance policy** towards unethical conduct and undertakes to apply the ethical and professional rules in its code of conduct by disseminating them as widely as possible, both internally and externally.

My Money Group expects the same commitment from its employees and partners (intermediaries or suppliers).

My Money Group supervises the distribution of its products through a set of procedures designed to prevent compliance risks, in particular the risk of money laundering and terrorist financing (1), corruption (2), and conflicts of interest and the risks of poor commercial practices (3).

6.1 PROCEDURES AGAINST MONEY LAUNDERING AND FINANCING OF TERRORISM

My Money Group is subject to the rules on the fight against money laundering and the financing of terrorism (AML/CFT) and to respect of the commercial restrictions imposed by means of economic penalties.

The system adopted aims to reduce the risk of legal or regulatory penalties, financial loss or reputational damage. It rests on a risk approach as defined by the regulations, KYC, the oversight of transactions and the reporting of suspicions to TRACFIN.

6.2 MEASURES TO FIGHT CORRUPTION IN THE CONDUCT OF BUSINESS

The Group has adopted procedures to fight corruption in the conduct of its business, including the application of strict rules concerning benefits and gifts, challenges and sponsorship. These procedures also apply to the selection and monitoring of its intermediaries and suppliers and to accounting controls.

To complement these measures, an **independent internal alert system** has been introduced. This enables all employees to report, anonymously or otherwise, any behaviour or situation that potentially violates the code of conduct or the laws. This is additional to the traditional method of reporting issues to line managers, the compliance department, HR or ad hoc departments or committees.

It covers warnings concerning the facts and risks set out in articles 6 to 16 of the law no 2016-1691 of 9 December 2016 on transparency, the fight against corruption and the modernisation of economic life ("Sapin II").



6.3 PROCESSES TO AVOID CONFLICTS OF INTEREST AND THE RISKS OF UNFAIR COMMERCIAL PRACTICES

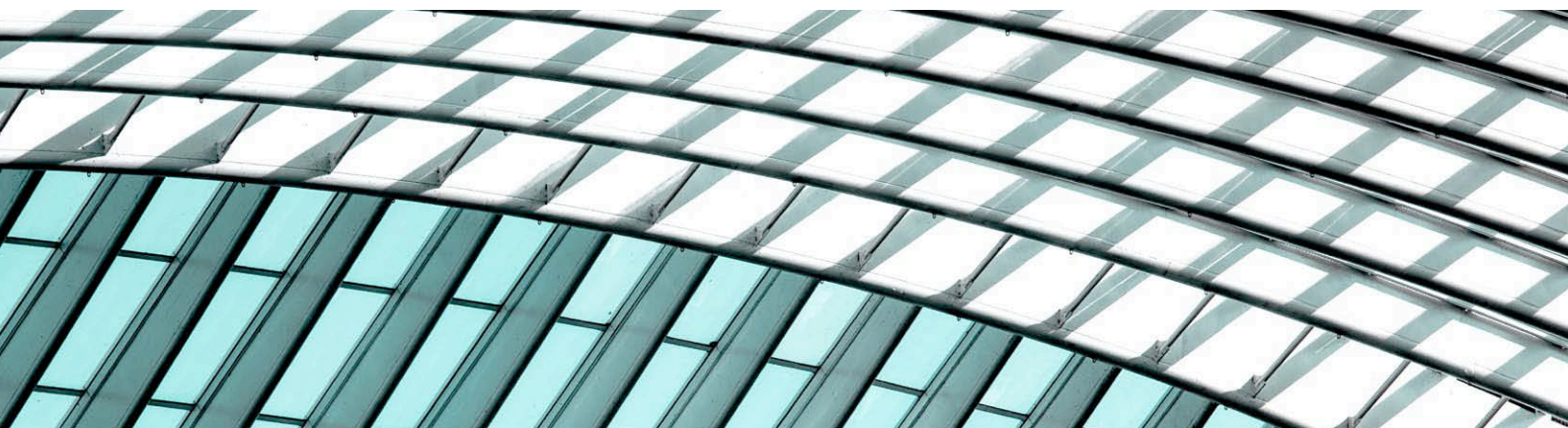
My Money Group has adopted a position that aims to avoid conflicts of interest in its business relationships: **all unfair commercial practices are forbidden**. Its priority is customer satisfaction and the primacy of customers' interests. Employees in contact with customers must prevent any conflict between the interests of customers and their own personal interests. When delivering advice to customers, they must identify their needs and be certain that the product recommended meets the needs expressed and that the customer properly understands the product.

For the purposes of its finance business, My Money Group verifies the customer's debt capacity and offers appropriate products. **It refuses to grant loans to customers identified as financially fragile, or where the loan would put them in such a position.**

My Partner Bank, as an investment services provider, complies with the obligations defined by the general regulations of the market regulator AMF. Risk reduction measures rely in particular on governance arrangements for instruments, and an assessment, when advising customers, of their knowledge, experience, investment needs and objectives, risk appetite and ability to sustain losses. My Partner Bank has adopted a policy of "best selection" and "best execution" in line with its licence for the reception, transmission and execution of orders, and ensures the appropriate nature of the order.

Furthermore, all My Money Group employees undertake to conduct no external business that could conflict with their responsibilities at My Money Group. In accordance with the code of conduct, they report any potential conflict of interests as soon as the situation arises.

The Group also protects itself from the risks posed by poor commercial practices by ensuring the quality of its distribution network. Consumer protection is a constant concern.





7 CONSUMER PROTECTION

Within My Money Group, consumer protection measures rely on rules to guarantee service quality and customer satisfaction.

The main oversight rules relate to:

- advertising and communication aimed at consumers: My Money Group controls all commercial documents and other media intended for its customers in order to ensure that the information is clear, accurate and not misleading;
- offer pricing: My Money Group has strengthened its procedures for managing its charging policies, but also those for ensuring respect for interest rates, regulatory obligations arising from the revision of general banking conditions, and the remuneration rules for distributors. Promotional offers and challenges are routinely subject to the prior approval of the compliance director;
- the selection and monitoring of business relationships with intermediaries: the choice of intermediaries is dependent on their compliance with professional and regulatory obligations and on their good repute. Only those meeting these criteria are permitted to distribute My Money Group products. Intermediaries are regularly and frequently assessed, adopting a risk-based approach. They are controlled as part of the regulatory obligations relating to the outsourcing of the essential service of intermediation;
- monitoring sales practices: My Money Group controls the proper marketing of its products, for example by contacting the customers of My Money Bank and its overseas subsidiaries to conduct post-sales calls to verify the quality of the advice provided by the distributor;
- centralised claims processing is used to identify any poor commercial practices or malfunctions in terms of consumer protections and to take corrective measures as rapidly as possible;
- the policy of banking inclusion and the prevention of over-indebtedness aims at the early identification of customers in a financially fragile state, and to support them with appropriate solutions;
- the protection of customer assets: as a bank, My Money Group ensures the protection of its customers' assets in line with its obligations;



8 IDENTIFICATION OF SHORTCOMINGS, AND RISK REDUCTION PROCEDURE

The body of procedures adopted by My Money Group and its subsidiaries relies on a system of referring malfunctions to the immediate supervisor in the first instance. This supervisor also plays an advisory role for teams.

The compliance and permanent oversight departments identify, centralise and refer failures in procedures or their application to the ad hoc committees. These key departments also have a direct link to the chief executive and the management board in order to guarantee the principle of independence. Every department ensures that the necessary remediation measures are taken.

The permanent and periodic oversight departments issue recommendations in order to remedy inadequacies where these are significant and require corrective measures. These are followed up until resolved.

Furthermore, My Money Group's different entities can access an independent internal channel for alert feedback, enabling employees to report a wide spectrum of incidents or professional alerts, anonymously or otherwise.

Taken together, these measures contribute to risk reduction through the continuous amendment of risk-mapping.

B Protecting data and ensuring cybersecurity

Against the background of widespread digitalisation of the banking market and customers' new modes of consumption, the Group decided to implement an **innovative digital strategy**, taking measures for data protection (i) while revising its IT structures and work organisation (ii).

1 HOW DOES THE GROUP ENSURE DATA PROTECTION?

Data protection and security are critical issues for My Money Group, and a **consistent, consolidated approach** must be adopted, not least to ensure compliance with the General Data Protection Regulation (GDPR) and cybersecurity measures. This approach is in place for My Money Bank and entities in overseas departments, and will be strengthened in 2020 for My Partner Bank. 2019 was a year of transition and integration for My Partner Bank, so certain measures have remained specific to this company.

In consequence, the information will be separately presented below for each of the two environments.



1.1 DATA PROTECTION AT MY MONEY BANK AND SUBSIDIARIES IN OVERSEAS DEPARTMENTS

Continuing the steps taken in 2018 to ensure GDPR compliance (updated register of processing activities, mentions of information, establishing e-learning courses, etc.), My Money Bank intends to revise its data protection systems, including those of its overseas subsidiaries.

GDPR requirements have been translated into policies and procedures specific to data protection (management of individual rights, data violations, subcontractors, handling processing declarations, conducting data protection impact analyses, etc.). These requirements are also presented in the existing company documents (IT charter, data governance policy etc.)

Strengthening this body of documents goes hand in hand with the introduction of a GDPR compliance questionnaire, rolled out within all departments. This tool is the central plank of the data protection system. It enables the Data Protection Officer (DPO) and the Information Systems Security Manager (ISSM) to ensure the compliance of the processing reported to them, and to update the processing record.

The training measures and awareness-raising conducted by the DPO and the ISSM are also key factors in the data protection system. In 2019, more than 200 employees in mainland France took part in a “**GDPR Escape Game**” organised during the annual data security week.

This fun and interactive activity enabled them to increase their knowledge of data protection.

97.15% of employees in mainland France and overseas **have also taken the GDPR e-learning course.**

Finally, all model contracts for outsourcing have been reviewed in order to include GDPR clauses. A standard annex and an operational method are therefore available to all employees wishing to enter new partnerships with players that process personal data.

These measures are monitored by the GDPR steering committee and the data privacy committee.

1.2 DATA PROTECTION AT MY PARTNER BANK

The integration of My Partner Bank in the Group has mobilised the different teams and its transformation has suspended the construction of a network of data protection officers.

However, those engaged in the GDPR project, coordinated by the steering committee, have continued to implement the action plan established in 2018 with the company DPMS, the external DPO of My Partner Bank, including the expansion of the body of documentation (specific “administrators’ clauses”, various registers, etc.) and the development of a permanent control system.

For example, a processing operations register has been developed, and discussions were held with MMB on the choice of a tool for the efficient management of this information.



2 HOW DOES THE GROUP MANAGE IT RISKS?

Further, work to bring outsourcing contracts into compliance has focused as a priority on external suppliers of essential services, in accordance with regulatory banking provisions.

The momentum brought about by integration in My Money Group has reshaped the perspectives of the action plan. To this end a specialist consultancy was appointed during the last quarter to guide My Partner Bank in its approach.

For the purposes of governance, the steering committee, which generally meets monthly, is accompanied during this mission by a weekly project committee.

The increasing complexity of the new technologies, the development of “cloud” computing and the growing cybersecurity risk are reflected, in general and over-arching terms, in a significant rise in incidents affecting information systems (including cybersecurity incidents).

The banking sector, which is undergoing profound digital changes, is directly impacted by the complexity and the specific nature of cybersecurity:

- it is difficult to determine the precise consequences of a potential breach of security, as cyberattacks are ever more sophisticated and difficult to eradicate;
- the impacts can be significant, and can directly impact business continuity, in particular by corrupting backup data;
- the multiplicity of players involved, such as suppliers or service providers, increases the cybersecurity risks of outsourcing. This is because a subcontractor whose security measures are not compliant can represent a way into an institution’s information system.

These aspects of the cyber field are forcing all My Money Group’s entities to adapt their performance in terms of IT security.





To respond to these concerns, My Money Bank, in conjunction with the regulators' recommendations, is gradually strengthening its risk mitigation measures. To control the IT risk, My Money Bank has been inspired by the practices described in ISO 27001 in order to implement its information security management system (ISMS). As IT risk control is not the responsibility of IT teams alone, the institution has opted to include it in a generalised approach to the control and management of risks under the leadership of the risk director (the "Group Chief Risk Officer" referred to in the banking regulations).

Through this organisation, which is required to serve all the Money Group entities, the managing bodies of the Group are directly involved both in bringing IT strategy into line with the risk appetite and in implementing and following up risk mitigation measures.

The agile and digital transformation of My Money Group involves a parallel strengthening of mechanisms for managing existing and emerging risks of this type. Digitalisation has led My Money Bank to adopt a range of cloud computing solutions, including software as a service (SaaS) and infrastructure as a service (IaaS), that enable it to significantly reduce its costs and delays in developing new applications.

Aware of the impacts of the use of cloud computer technologies and the risks that they can entail, particularly for a banking activity, the Group is taking great care to respond to the recommendations and expectations of its regulators – the Autorité de Contrôle Prudentiel et de Résolution, the European Banking Authority and the National Commission on Information Technology and Liberties – by implementing secure, controlled solutions.

The risk mapping that was begun during 2018 was reviewed in 2019 in order to include the risks associated with the new structural and operational arrangements for Group IT. This provides an accurate picture of the points requiring attention from staff in charge of IT assets in the course of their day-to-day work.

In terms of IT security, My Money Group is adopting an approach of constant improvement, not least in the Security Operation Center (SOC), the remit of which is changing as the Group's information system evolves. In addition, security teams support staff in charge of IT assets by regularly raising awareness of the security issues to be taken into account within projects.

In order to ensure a satisfactory level of security, the products developed within the Group are subjected to particular attention through code reviews, technical safety audits and raising awareness of secure development among product teams.



THE GROUP RISK REDUCTION POLICY

Regular monitoring of subcontractors

The Group sourcing team provides monthly monitoring of all subcontractors in order to guarantee the rigour, service quality and expertise they deliver. It is imperative for the Group to maintain a high level of quality and security in its services and products, particularly where outsourcing is used. Furthermore, all new relationships with a provider are subject to a security risk assessment.

Controls on security measures

The development of internal practices has led the Group to define and establish new controls on its ISMS in order to ensure the sound management of its risks.

Specialist training provided to employees

The adoption of agile practices within the Group is accompanied by measures to raise teams' awareness of cybersecurity risks.

In the case of My Partner Bank, 2019 has mainly been a transitional year since its change of ownership in December 2018. In terms of its information system, the second half was marked by the project integrating it into the My Money Group network. This significant change to its network infrastructure enables My Partner Bank to enjoy an increased level of security, benefitting from the measures taken by the Group.

In order to meet market and customer expectations, My Partner Bank has also conducted a "lean" review of its loan issuance procedures in order to identify improvements, in particular to shorten the "time to answer". This work will continue in 2020 with the launch of a digital transformation programme for this process. ●

3

My Money Group's environmental approach

The financial industry has long suffered from a negative image, and has been seen as supportive of polluting industries, without much awareness of its environmental role. Although the businesses of its entities entail no polluting activities or activities classified as posing a risk, My Money Group has opted to pursue a **socially responsible environmental policy**.

Aware of the role of banking and financial institutions in climate change, **My Money Group decided to take part, at its level, in the general spirit of the fight against climate change**. Whether through its employees, customers or financial products, the Group is making efforts to **encourage environmentally responsible behaviour**.

My Money Group has for several years taken measures designed to include the environmental dimension of projects, finance, equipment or internal initiatives. For example, My Money Group entities have already undertaken the following measures:



- the promotion of finance for electric vehicles by Sorefi and Somafi-Soguafi – the volume of finance for this type of vehicles through the “L'Electrik” brand by Sorefi and Somafi-Soguafi has already **channelled nearly 2 million euro into the purchase of environmentally-friendly vehicles (doubling the 2018 volume of finance)**;
- the introduction of hybrid and electric vehicles, with an upgraded budget, in the range of company vehicles approved for eligible employees;
- **partnership with the departments of Guadeloupe and Martinique for the financing of new solar boilers**;
- the distribution, through setting up a Facebook page for Sorefi and Somafi-Soguafi, of content promoting good citizenship (energy saving, recycling, tips for avoiding waste, etc.).



More strategically, My Money Group is closely following current movements in the “**green finance**” segment which is developing in Europe.

By establishing the building society MMB SCF in 2018, My Money Group set up an entity enabling it to refinance directly on the financial markets. The Group’s managing bodies ultimately envisage the incorporation of environmental issues in the structuring of its financial issues.



To assess the environmental risks and challenges for the activities of My Money Group, this report consists of two parts:

A How the Group can adapt its business to environmental challenges

B The physical risks of extreme climate events

A How did the Group adapt its business to environmental challenges?

As a corporate citizen, My Money Group is particularly attentive to climate disruption and the issues that accompany it. Internally, the Group has for several years conducted a responsible policy for the management of its resources (paper, electricity, etc.) and fully integrates these aspects in controlling its costs.

1 WHAT IS THE GROUP'S ENERGY PERFORMANCE POLICY ON ITS PREMISES?

In deciding to locate its registered offices, and those of its main subsidiaries, in the Europlaza Tower at Paris La Défense, the Group has taken care to choose premises that meet high energy performance standards, since these premises have received High Quality Environmental (HQE) certification. NF HQE certification for new or renovated service buildings (NF HQE Bâtiments Tertiaires - Neuf ou Rénovation) makes it possible to enhance the performance of buildings, but also to reduce their consumption and environmental impact and to improve the health and comfort of their users.

Internally, using posters in the cafeterias in the Paris building, management have raised employee awareness of the Tower's undertaking to sort waste. Employees are thus urged to use the bins – as appropriate to each waste type – provided in the offices, cafeterias and other shared spaces.

In terms of the thresholds established by the decree no 2013-1121 of 4 December 2013, namely (i) a workforce exceeding 250 persons and (ii) revenue of more than €50 million or a total balance sheet not exceeding €43 million, the company My Money Bank, a member of the Group, is obliged to conduct an energy audit of its activity every four years.



This obligation is enshrined in article 40 of law no 2013-619 of 19 July 2013 “containing various measures adapting law to European Union law in the field of development”.

Accordingly, the company SINTEO conducted NF EN 16247-1 and 2 energy audits in Paris (Europlaza Tower) on 19 January 2016 and in Nantes (Alaska and Idaho buildings) on 23 February 2016.

A new audit cycle will be carried out in 2020 for the two My Money Bank sites to include the premises occupied by My Partner Bank.

Further, in day-to-day operations, My Money Group ensures the sustainable and rational use of resources by all its employees.

1.1 MEASURES TAKEN TO REDUCE WATER CONSUMPTION

Water consumption is not involved in any manufacturing process associated with the Group’s activities. Nonetheless, a number of measures have been taken in order to reduce the water consumption of employees; for example, in 2019 all the tap mechanisms in the sanitary areas were fitted with motion sensors.

Over the 2019 financial year, total water consumption stood at 3 230 m³ for all the Group’s entities.

1.2 MEASURES TAKEN TO IMPROVE ENERGY EFFICIENCY AND THE USE OF RENEWABLES

Lighting operating hours are restricted to certain time periods and to the days when employees are present. This measure has seen electricity consumption fall, and consequently the environmental impact also. In premises in mainland France, lighting and air conditioning systems are switched off every evening at 10.00 PM, and can only be switched on manually or through a motion detection system.

This approach is accompanied by a number of initiatives, including:

- the replacement of used light bulbs with low-power LEDs;
- the renovation of air conditioning circuits in 2019 in agreement with the manager of the premises at La Défense. These works have replaced the lost-water air conditioning with a new and more efficient closed-circuit system with better energy performance, re-using the chilled water provided by a specialist company;
- the replacement of a large proportion of the computer screens by screens with low consumption.

During 2019, electricity consumption¹ for all the Group’s entities totalled 1 697 184 kWh, equivalent to greenhouse gas emissions of 443.6 tonnes carbon dioxide equivalent. In comparison with the previous period, My Money Bank saw a slight rise in its electricity consumption, from 802 001 kWh in 2018 to 832 809 kWh in 2019.

¹ See the calculation method under IV. Reminders and general information



The electricity consumption of My Money Bank in 2019 was equivalent to greenhouse gas emissions of 47.55 tonnes CO₂ eq, compared with 45.8 tonnes CO₂ eq in 2018.

My Money Group applies various measures to promote the use of the most responsible transport modes for employees' journeys.

To this end, a list of eligible vehicles with low CO₂ emissions has been drawn up for the company vehicle fleet (around 100 vehicles). Fuel consumption² for all the Group's entities in 2019 was equivalent to greenhouse gas emissions of 411 tonnes CO₂ equivalent. In comparison with the 2018 period, during which My Money Bank recorded greenhouse gas emissions of 99.8 tonnes CO₂ equivalent, the entity consumed the equivalent of 116 tonnes of CO₂ in 2019. Car parks fitted with charging points have been created for electrical vehicles at the Paris La Défense site, and bicycle parking has been provided at the Nantes site.

The growth of working-from-home for employees also contributes to limiting the impact of business travel on the environment.

The installation of five video-conferencing rooms in the premises at La Défense and Nantes in 2019 facilitates communication between the two sites and helps to reduce employees travel.

2 WHAT IS THE GROUP'S RESPONSIBLE CONSUMPTION POLICY?

2.1 A RESPONSIBLE PAPER CONSUMPTION POLICY

The only real raw material consumed is paper. In 2017, a **campaign to digitalise exchanges of information**, accompanied by the introduction of dual screens for managers, along with a printer pool programmed to delete printing works not recovered after 48 hours, has reduced paper consumption.

For My Money Bank, paper consumption in 2018 was a total of 25.4 tonnes compared with 32.7 tonnes in 2017, representing a reduction of 7.3 tonnes thanks to the 2017 digitalisation campaign. In 2019, paper consumption for the same entity stood at 23.7, nearly 1.7 tonnes less than in 2018. In addition, the more than half the paper used is based on recycled paper.

The introduction of a "universal desktop" to handle customers' and prospects' documents, another aspect of the digitalisation of My Money Group, has also reduced unnecessary paper transactions.

In the same vein, the launch of digital signature projects in mainland France and the overseas departments aims to avoid the need for printing.

² See the calculation method under IV. Reminders and general information





2.2 A RESPONSIBLE POLICY FOR THE PURCHASE AND MANAGEMENT OF COMPUTER EQUIPMENT

My Money Group encourages a responsible approach to the purchase and management of IT equipment. For example, the majority of computer screens issued to staff are low-power, and ink cartridges are recycled when they run out.

2.3 REFURBISHMENT OF THE STAFF RESTAURANT AT PARIS-LA-DÉFENSE

When the staff restaurant was refurbished by management at the Europlaza Tower starting in July 2019, My Money Group, in collaboration with the other tenants, took part in the selection of suppliers, giving preference to those that met the environmental criteria. The partnerships concluded for the re-opening of the restaurant in June 2020 are with local producers, taking account employee welfare and supplying **environmentally responsible products**. Further, receipts for payments of meals will be e-mailed direct to each employee, thus avoiding printing.

Drink and snack machines were also replaced in 2019 by more environmentally-friendly equipment distributing healthier products.

B What are the physical risks of extreme climate events?

My Money Group's finance subsidiaries in Réunion, the Antilles, Guyana and New Caledonia operate in geographical areas that regularly experience violent climate events which are occurring with increasing frequency.

Whether to protect employees, equipment and buildings, or in the interests of customers, My Money Group has adapted measures in place to support its overseas subsidiaries during such events.



1 MANAGEMENT OF RISKS TO EMPLOYEES AND GROUP ASSETS

As a responsible employer, My Money Group strives to ensure the physical and psychological safety of its employees.

Hence, when severe weather warnings are issued in the geographical areas, particularly those overseas, where Group employees are present, all possible safety measures and precautions are taken.

The Group's organisations are designed to offer an off-site service in the event that the teams are forced by weather conditions to work from home.

In the event of violent climate events, local managers are required to check up on the health of their employees. They must also make flexible adjustments to working conditions and methods to enable their employees to respond with equanimity during critical climate episodes.

My Money Group also ensures that premises and working equipment and materials are not at risk of destruction or severe damage by natural disasters. Given the nature of its business, My Money Group is obliged to maintain the continuity of its services by guaranteeing the integrity of all data, in particular by appropriate back-up measures.

The banking regulations to which they are subject also oblige My Money Group entities to draft an emergency plan and a business continuity plan to ensure the continuation of company activities in the event of any serious incident, accident or natural disaster.

This plan identifies the various major risks (not only environmental risks) for each site and sets out crisis management plans.

Its main objectives are:

- ensuring the safety and protection of employees and goods or assets;
- minimising the impact on customers or the potential economic loss;
- maintaining critical business functions and regulatory compliance;
- restoring the working environment.

The emergency and business continuity plan covers the following aspects:

- risk assessment;
- analysis of the impact of potential incidents on business;
- installation of and respect for preventive measures;
- preparation and updating of emergency IT and business continuity plans;
- crisis management and launch of emergency and business continuity plans;
- continuity of essential externalised services and key suppliers;
- ongoing employee training;
- verification of plans by periodic exercises;
- periodic assessment of the continuity plan (self-assessment, internal audit reviews).



Under the authority of the managers of each Group entity concerned, an emergency and business continuity officer is appointed with responsibility for maintaining the plans, training employees and conducting the exercises. His work is supervised by the officer with overall responsibility for emergency and business continuity plans in all the Group's entities.

Apart from financial factors, My Money Group takes account of the **human aspect of lending activities**, supporting its customers and taking account of their personal circumstances.

For example, when Hurricane Irma devastated a number of areas in the Caribbean in early September 2017, the Group had to cope with unheard-of situations.

Somafi-Soguafi, the subsidiary directly affected, was able to apply the human and technological resources necessary to confront this emergency and meet the needs of its customers and partners, using a team of more than four dedicated employees and two direct telephone lines.

This exceptional telephone platform, rapidly operational, was able to offer affected customers suspended payment dates, or to disregard late payment charges due to their particular situation.

Illustrating one of the four principal values of My Money Group – adaptability –, this initiative was unanimously welcomed by the customers who benefitted from it. ●

2 HOW DOES THE GROUP MANAGE CUSTOMERS' RISKS?

A customer-focused banking partner, My Money Group does its best to provide support in the sometimes-distressing experiences that can follow major climate events (storms, hurricanes, floods, etc.), especially in overseas geographical areas.



“A customer-
focused
banking partner”





04



**Reminders and general
information**



1 WHAT IS THE SCOPE OF THE PRESENT STATEMENT?

The scope of this statement is the consolidation scope of the financial holding company Promontoria MMB and all its operational subsidiaries at 31 December 2019, including My Money Bank, My Partner Bank, and their subsidiaries.

2 WHAT IS THE RELEVANCE OF THE INFORMATION?

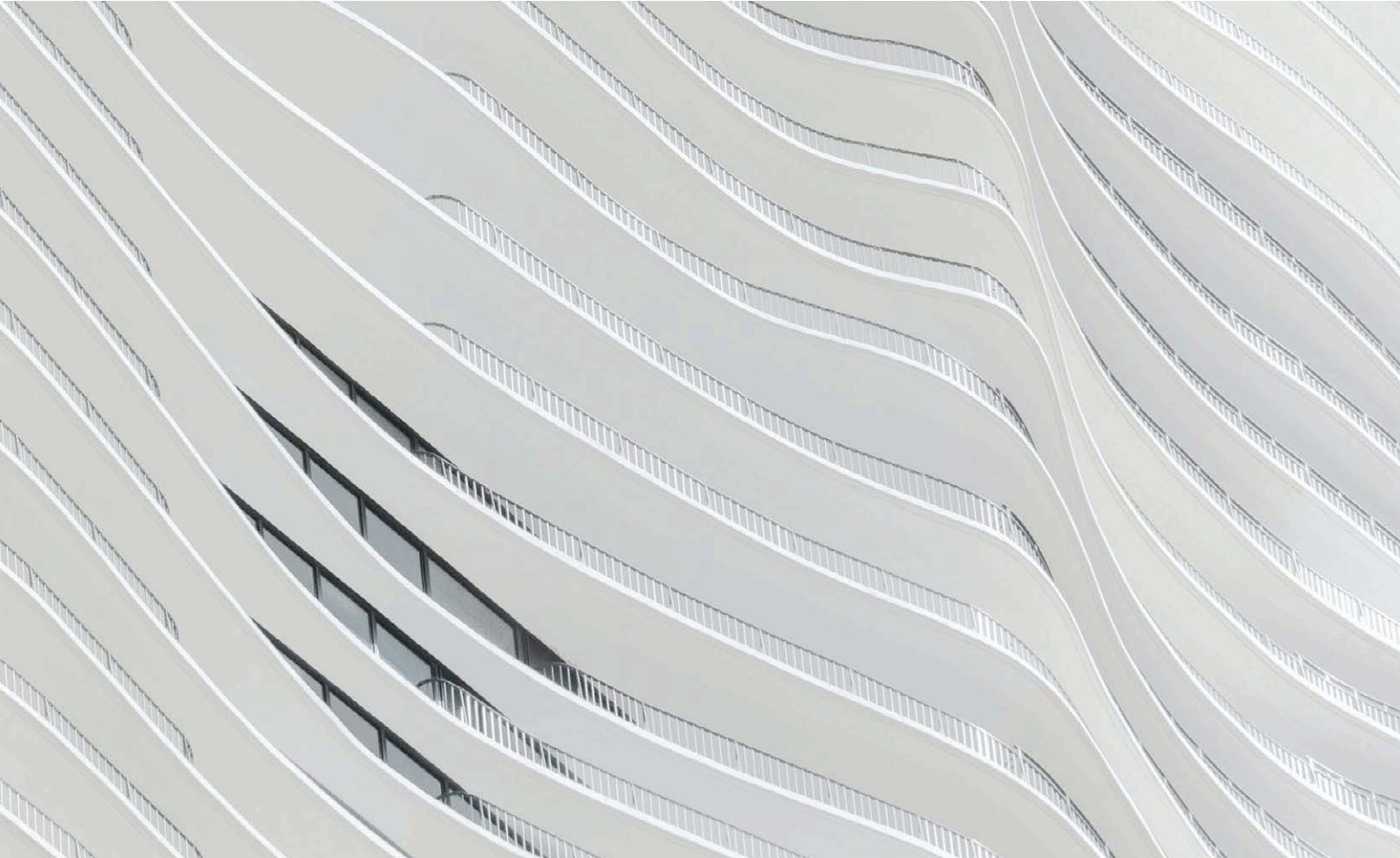
The My Money Group statement of non-financial performance only relates to the risks, challenges and opportunities that are relevant in light of its business model.

3 WHAT ARE THE DESCRIPTIONS OF POLICIES?

For each significant risk, a description is presented of the policies adopted to prevent, identify or mitigate its occurrence.

4 WHAT ARE THE INDICATORS AND COMPARABILITY WITH THE YEAR N-1?

Given that the companies in the My Partner Bank group (formerly BESV) were integrated on 28 December 2018, the information presented in the My Money Group statement of non-financial performance for the 2018 financial year did not take them into account. Disclosures concerning My Partner Bank are, however, included in this statement of non-financial performance drawn up for the 2019 reporting period. Further, some indicators have been introduced for the 2019 financial year. In consequence, the overall data in the 2018 and 2019 statements are not directly comparable.





5 WHAT ARE THE ENERGY INDICATORS?

ELECTRICITY CONSUMPTION

The consumption of electricity by all the Group's companies has been calculated on the basis of the invoices issued for the months from December 2018 to November 2019, except in the case of My Partner Bank, which presents electricity consumption for the 2019 calendar year.

The calculation of the carbon content of electricity (in tonnes of CO₂ equivalent) is obtained by multiplying the total annual consumption in kWh by an emission factor published by the Agency for the Environment and Energy Management (ADEME) which differs by geographical location (see the table below):

ADEME factors 2018 / 2019 –
Electricity – Average mix – Consumption

Continental France	0,0571	kgCO ₂ e / kWh
Réunion	0,78	kgCO ₂ e / kWh
Martinique	0,84	kgCO ₂ e / kWh
Guadeloupe	0,702	kgCO ₂ e / kWh
Guyana	0,953	kgCO ₂ e / kWh

However, ADEME publishes no emission factor for electricity carbon conversion in New Caledonia. In consequence, Socalfi, an entity representing 2% of the Group's electricity consumption, 3% of its workforce and 5% of its net banking product, has been excluded from the consolidated calculation of the greenhouse gas quantities produced.

FUEL CONSUMPTION

To calculate My Money Bank's fuel consumption over the past financial year, contracts are simulated on the basis of a mileage rule of 48 months and 120 000 km (for one year: 30 000 km and per day: 82.19 km). The number of driving days, obtained from the contract term in days, is multiplied by 82.19. This provides an estimate of the kilometres driven during the year. Finally, this figure is multiplied by the CO₂ emission rate to obtain the annual gCO₂/km emissions. However, fuel consumption for the Group's other entities group has been calculated on the basis of the actual consumption of fuel in litres during the 2019 financial year.



6 HOW WAS THE INDEPENDENT THIRD-PARTY BODY CHOSEN?

The company Promontoria MMB has appointed KPMG S.A. as an independent third party charged with verifying, in accordance with the provisions of article R.225-105-2 of the Commercial Code, the compliance of the present statement of non-financial performance and the accuracy of the 2019 information it contains.

The report drawn up by KPMG as an independent third party appears in annex to the present statement of non-financial performance. ●





05



**Annex: independent
third-party report**



KPMG S.A.
Registered Office:
Tour EQHO
2 Avenue Gambetta
CS 60055
92066 Paris la Défense Cedex
France

Telephone : +33 (0)1 55 68 86 66
Fax : +33 (0)1 55 68 86 60
Website : www.kpmg.fr

Promontoria MMB S.A.S

Report by the Statutory Auditor, appointed as independent third party, on the consolidated non-financial statement

For the year ended 31 December 2019
Promontoria MMB S.A.S
20, avenue André Prothin, 92063 Paris-La-Défense
This report contains 5 pages

KPMG S.A.,
French company member
of the KPMG network
made up of independent
firms that are members of
KPMG International
Cooperative, an entity
under Swiss law.

Société anonyme d'expertise
comptable et de commissariat
aux comptes à directoire
et conseil de surveillance.
Inscrite au Tableau de l'Ordre
à Paris sous le n° 14-30080101
et à la Compagnie Régionale
des Commissaires
aux Comptes de Versailles.

Head office :
KPMG S.A.
Tour Eqho – 2 avenue Gambetta
92066 Paris la Défense Cedex
Capital : 5 497 100 €
Code APE 6920Z
775 726 417 R.C.S. Nanterre
TVA Union Européenne
FR 77 775 726 417



Promontoria
MMB S.A.S

Report by the Statutory Auditor, appointed as independent
third party, on the consolidated non-financial statement

15 April 2020

Promontoria MMB S.A.S

Head office : 20, avenue André Prothin, 92063 Paris-La-Défense

Report by the Statutory Auditor, appointed as independent third party, on the consolidated non-financial statement

This is a free English translation of the Statutory Auditor's report issued in French and is provided solely for the convenience of English-speaking readers. This report should be read in conjunction with, and construed in accordance with, French law and professional standards applicable in France.

For the year ended 31 December 2019

To the Annual General Meeting,

In our capacity as Statutory Auditor of your company (hereinafter the "entity") appointed as independent third party, and accredited by the French Accreditation Committee (Comité Français d'Accréditation or COFRAC) under number 3-1049 and, as a member firm of the KPMG International network, one of your statutory auditors, we hereby report to you on the consolidated non-financial statement for the year ended on December 31st 2019 (hereinafter the "Statement"), included in the Group Management Report pursuant to the requirements of articles L.225-102-1, R. 225-105 and R. 225-105-1 of the French Commercial Code (Code de commerce).

RESPONSABILITY OF THE ENTITY

The Management Board's is responsible for preparing the Statement, including a presentation of the business model, a description of the principal non-financial risks, a presentation of the policies implemented considering those risks and the outcomes of said policies, including key performance indicators.

The Statement has been prepared in accordance with the entity's procedures (hereinafter the "Guidelines"), the main elements of which are presented in the Statement and available upon request at the entity's head office.

INDEPENDENCE AND QUALITY CONTROL

Our independence is defined by the requirements of article L.822-11-3 of the French Commercial Code and the French Code of Ethics (Code de déontologie) of our profession. In addition, we have implemented a system of quality control including documented policies and procedures regarding compliance with applicable legal and regulatory requirements, the ethical requirements and French professional guidance.

¹ Accreditation scope available at www.cofrac.fr

RESPONSIBILITY OF THE STATUTORY AUDITOR APPOINTED AS INDEPENDANT THIRD PARTY

On the basis of our work, our responsibility is to provide a report expressing a limited assurance conclusion on:

- the compliance of the Statement with the requirements of article R. 225-105 of the French Commercial Code ;
- the fairness of the information provided in accordance with article R.225-105 I, 3° and II of the French Commercial Code, i.e., the outcomes, including key performance indicators, and the measures implemented considering the principal risks (hereinafter the "Information").

NATURE AND SCOPE OF OUR WORK

The work described below was performed in accordance with the provisions of Article A.225-1 et seq. of the French Commercial Code, as well as with the professional guidance of the French Institute of Statutory Auditors (Compagnie nationale des commissaires aux comptes or CNCC) applicable to such engagements and with ISAE 3000² :

- We obtained an understanding of all the consolidated entities' activities, and the description of the principal risks associated;
- We assessed the suitability of the criteria of the Guidelines with respect to their relevance, completeness, reliability, neutrality and understandability, with due consideration of industry best practices, where appropriate ;
- We verified that the Statement includes each category of social and environmental information set out in article L.225-102-1 III ;
- We verified that the Statement provides the information required under article R.225.105 II of the French Commercial Code, where relevant with respect to the principal risks, and includes, where applicable, an explanation for the absence of the information required under article L.225-102-1 III, paragraph 2 of the French Commercial Code;
- We verified that the Statement presents the business model and a description of principal risks associated with all the consolidated entities' activities, including where relevant and proportionate, the risks associated with their business relationships, their products or services, as well as their policies, measures and the outcomes thereof, including key performance indicators associated to the principal risks ;

² ISAE 3000: international standard on assurance engagements other than audits or reviews of historical financial information



- We referred to documentary sources and conducted interviews to
 - assess the process used to identify and confirm the principal risks as well as the consistency of the outcomes, including the key performance indicators used, with respect to the principal risks and the policies presented ;
 - corroborate the qualitative information (measures and outcomes) that we considered to be the most important³. Concerning certain risks (digitalisation, sustainable products distribution and risks related to violent climate events), our work was carried out on the consolidating entity, for the other risks, our work was carried out on the consolidating entity and on a selection of entities⁴ ;
- We verified that the Statement covers the scope of consolidation, i.e. all the consolidated entities in accordance with article L. 233-16 of the French Commercial Code; ;
- We obtained an understanding of internal control and risk management procedures the entity has put in place and assessed the data collection process to ensure the completeness and fairness of the Information ;
- For the key performance indicators and other quantitative outcomes that we considered to be the most important⁵, we implemented :
 - analytical procedures to verify the proper consolidation of the data collected and the consistency of any changes in those data ;
 - test of details, using sampling techniques, in order to verify the proper application of the definitions and procedures and reconcile the data with the supporting documents. This work was carried out on a selection of contributing entities⁶ and covers between 50% and 59% of the consolidated data selected for these tests.

³ Actions taken for talents retention; Measures taken for developing employees' skills; Actions taken to improve employees' well-being; Engagements for using a less-carbon intensive energy; Actions plans in case of violent climate events; Actions taken to ensure the firm compliance towards regulation; Actions taken for ensuring data protection; Engagements for customers satisfaction.

⁴ My Money Group headquarters in Paris.

⁵ **Social indicators:** Total headcount (permanent and non-permanent) as of the 31st of December (broken down by gender and age); Employees average age; Number of recruitments (permanent and non-permanent); Number of part-time employees; Number of training hours; Number of training hours per employee; Number of declared disabled employees.

Environmental indicators: Electricity consumption; Greenhouse gas emissions related to electricity consumption and work-related travels; Greenhouse gas emissions work-related travels per employee.

⁶ My Money Bank, My Partner Bank, SOMAFI-SOGUAFI, SOREFI, SOCALFI, P MMB



Promontoria MMB
S.A.S

Report by the Statutory Auditor, appointed as independent
third party, on the consolidated non-financial statement

15 April 2020

- We assessed the overall consistency of the Statement based on our knowledge of all the consolidated entities.

We believe that the work carried out, based on our professional judgment, is sufficient to provide a basis for our limited assurance conclusion; a higher level of assurance would have required us to carry out more extensive procedures.

MEANS AND RESSOURCES

Our work was carried out by a team of five people between November 2019 and April 2020 and took a total of two weeks.

We were assisted in our work by our specialists in sustainable development and corporate social responsibility. We conducted interviews with people responsible for preparing the Statement.

CONCLUSION

Based on the procedures performed, nothing has come to our attention that causes us to believe that the non-financial statement is not presented in accordance with the applicable regulatory requirements and that the Information, taken as a whole, is not presented fairly in accordance with the Guidelines, in all material respects.

Paris-La-Défense, le 15 avril 2020

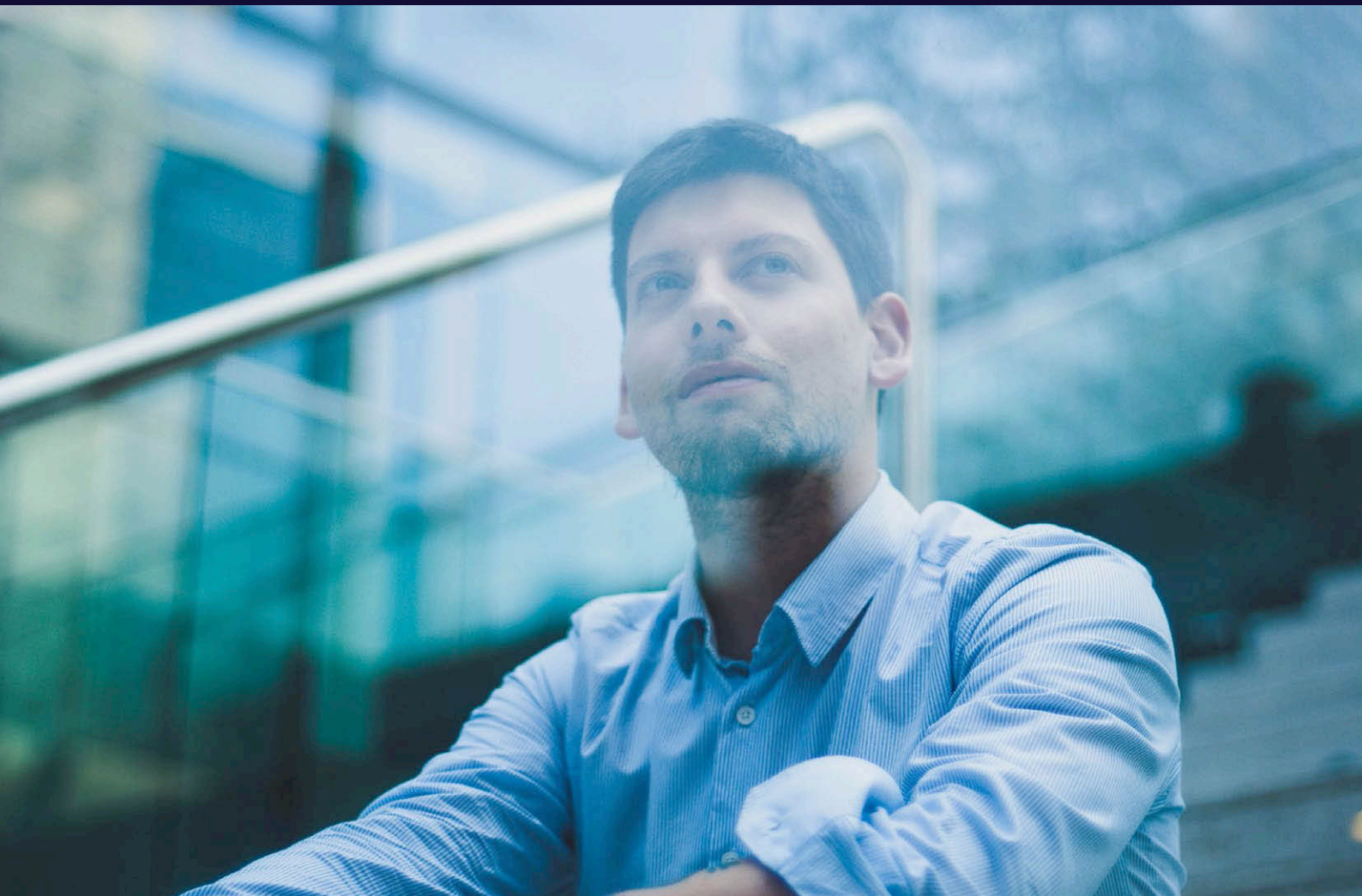
KPMG S.A.

Anne Garans
Partner
Sustainability Services

Fabrice Odent
Partner



Contact:
communication@mymoneygroup.com





my money group

Tour Europlaza
20, avenue André Prothin
92 063 Paris
La Défense Cédex

Design by ©  amurabi