

Code
of conduct
2024

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The Board of Directors and the Executive Committee of the CCF Group share a strong conviction: the success and sustainability of our Group requires irreproachable behaviour from each and every one of us.

Our future and our success are based not only on our professional skills but also the strict application of our ethical ethics and deontology in the conduct of our business.

In a world that is changing and where transformations are accelerating, the CCF Group aims to pursue its growth and development strategy, while continuing to the best interests of its customers and to comply rigorously with its obligations.

Beyond the obvious respect for laws and regulations, each of our decisions must reflect our integrity and our deep sense of ethical, social and environmental responsibility. These values underpin the way we do business, and are essential to the trust and are essential to the trust of our business relationships, both internal and external (customers, partners, employees, shareholders, etc.).

This code also sets out the guidelines for good conduct in the fight against corruption and influence peddling, and affirms our zero tolerance policy in the event of any violations of the rules described in our code.

It is in this spirit that our Code of Conduct was drawn up. It is a reference document and sets out the rules that guide our actions and behaviour, in line with our values. It states who we are, and invites all our employees and business partners to share this commitment.

Niccolò UBERTALLI
CEO de Groupe CCF

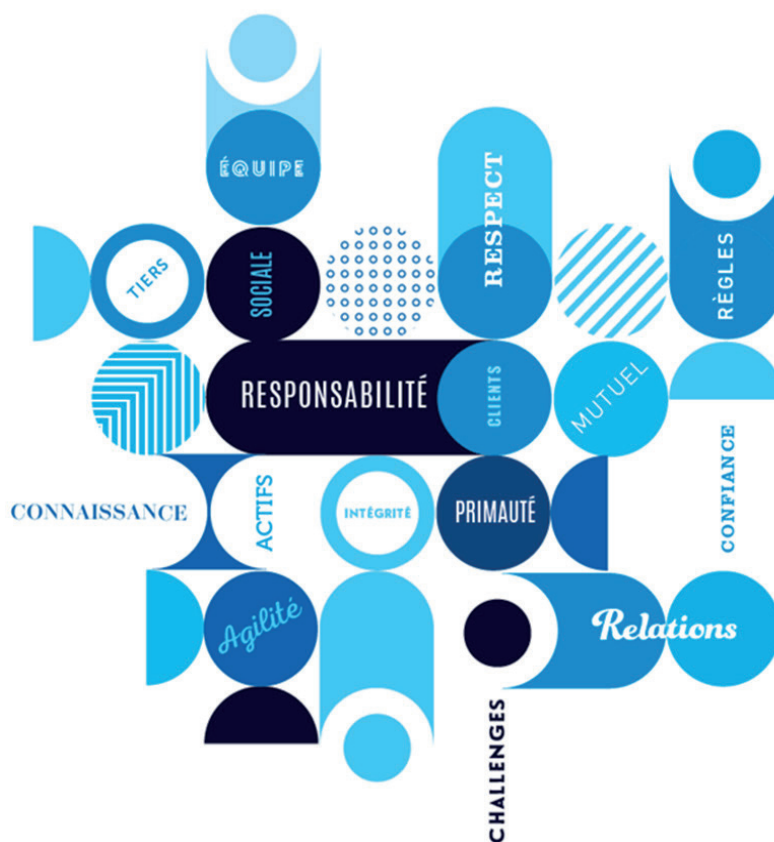


1 Presentation of the Group

Introduction

As a retail and finance bank for individuals and companies in mainland France and the French overseas territories, we support our customers on a daily basis as they realise their projects. As such, we have a duty to cultivate and share solid values of professional ethics and integrity.

The Code of Conduct defines the principles that guide our company and illustrates our desire to remain a responsible financial player that benefits from the commitment of its employees and which deserves the trust of our customers, partners, investors and shareholders. Convinced that performance of our activities is closely linked to compliance with the ethical standards applicable to our Group, these requirements must guide each and everyone of us in the performance of our duties.



Our commitments

The «Code of Conduct» provides each employee with an ethical framework to help him or her act and make the right decisions.

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The principles it contains constitute a clear set of commitments based on our values. These commitments give rise to a set of rules of conduct, set out in detail in this document, which specify the following professional conduct to be respected and promoted in the performance of our duties and in our working relationships.

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It is the responsibility of each employee, regardless of hierarchical level, to ensure that the values and principles of the Code of Conduct are lived and embodied in their daily work. This is a commitment for everyone, including shareholders, supervisory bodies and senior management.

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Each and every one of us has a duty to act with integrity, to respect our professional and ethical obligations, to promote adherence to our culture of compliance and to take all reasonable steps to ensure that our actions are in accordance with the law.
take appropriate action in the event of breaches of the law or of good professional practice.

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We also ensure that our partners, suppliers and other external relationships adhere to our values and principles when dealing with or on behalf of the company.

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We undertake to cooperate fully with the supervisory authorities to which we are subject, whenever they so request.

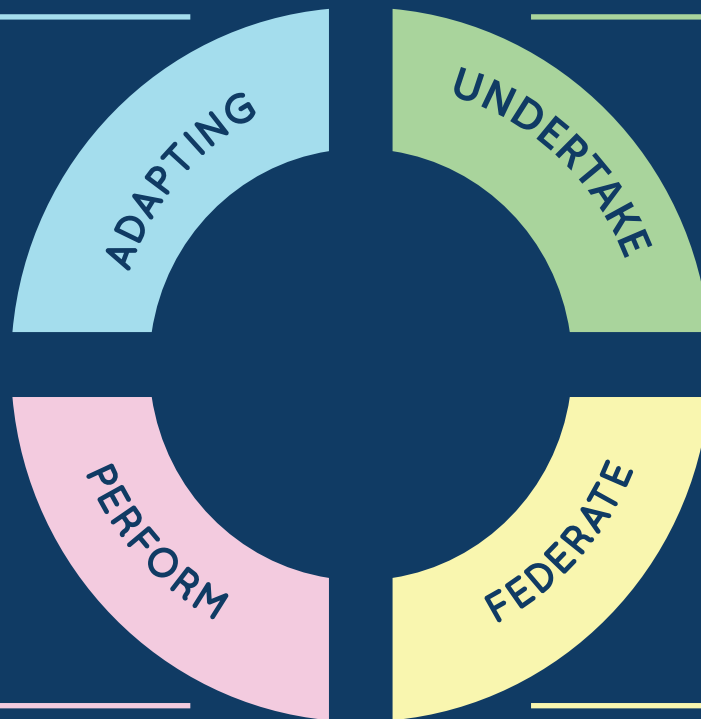
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Detailed procedures for the operational application of the practical rules set out in the Code of Conduct are available on the intranet of the Group and all its entities, or on request from managers or the Compliance Department..

Our values

- Helping to implement of change.
- Keeping a dynamic watch.
- Investing in talent and training.

- Seizing every opportunity for growth.
- Test, share and decide with agility.
- Innovating with our employees and our customers.



- Capitalising on a results oriented culture.
- Putting profitability at the heart of value creation.
- Achieving and exceeding corporate objectives.

- Recognising the commitment of our employees.
- Communicating transparently.
- Committing together respect and diversity.

INTEGRITY & EXPERTISE



2 Practising the Code of Conduct

Practising the code of conduct

Knowledge of and adherence to the rules

All directors, officers and employees undertake to be familiar with and comply with the Code of Conduct. They shall also ensure, whatever their entity or geographical area, that they apply the laws, regulations, professional standards and procedures applicable to their entity. They comply with them and put them into practice in a responsible manner. Failure to comply with these standards would have a negative impact on the confidence of our customers and expose the Group to serious legal and reputational consequences.

Decision-making

The Code of Conduct is the tool that should guide us in our day-to-day actions and decisionmaking. It provides useful guidance on how to apply the rules of conduct. However, it is impossible to provide a rule for every situation. It is therefore up to employees to exercise their personal judgement in applying the principles described in the Code to their activity and duties.

Before you act, ask yourself:

- *Is this legal?*
- *Is this consistent with the principles, values and rules that govern the Group?*
- *Have I considered all the risks and consequences of my decision?*

- *Could my decision have a negative impact on our customers, business partners or the Group's image and reputation?*
- *Do I feel comfortable explaining my decision?*
- *Putting myself in the shoes of those affected, would I still have taken this decision?*

If the answer to any of these questions is uncertain or negative, it is best to refrain or seek advice from :

- *His direct hierarchy*
- *A manager outside the hierarchy*
- *The General Secretariat (including the Compliance Department, the Institutional Relations Department, the Personal Data Protection Department and the Legal Department)*
- *The Human Resources Department*

Accessibility of the Code of Conduct

The Code of Conduct is given to each employee on arrival. It is available at any time from the Compliance Department. It is made available to our business relations on the website of the Group and each of its subsidiaries.

In the event of a breach of the Code

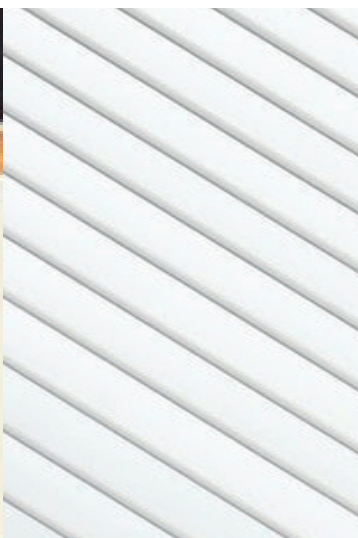
In the event of a breach or failure to comply with the requirements of the Code of Conduct, CCF Group may, where appropriate, apply disciplinary sanctions as described in the Internal Rules in force within each Group entity.

How do I report a breach?

Any employee, whether internal or external, can exercise their right to alert by reporting a non-compliance malfunction, an operational risk or, more broadly, any risk related to the banking and financial businesses. They may also report any suspected inappropriate, unethical, unprofessional or illegal behaviour.

It is aimed primarily at line managers as well as the Regulatory office (Compliance Department, Legal Department, etc.) or any specialised department (Human Resources, etc.) that provides advice to employees. At the same time, a system of professional alerts is available to all employees of the Group and its business relations .

Each of us must feel free to share our concerns without fear of reprisals. The CCF Group reiterates that raising an internal alert is a right: all employees must be able to express their doubts without facing any retaliation or sanction, directly or indirectly, for having raised an alert in good faith and in accordance with best practice. The CCF Group undertakes to take all necessary measures to protect the identity of whistleblowers and of the persons concerned by a report, and to guarantee the confidentiality and security of the data transmitted. Whistleblowers, investigations and reports are treated confidentially.





3 Rules of Conducts

Group reputation



Group reputation

Act responsibly to preserve the trust of our customers and the good reputation of our Group.

Preserving the image and good reputation of our Group is a major challenge if we are to ensure the longterm future of our business. Our reputation is also a guarantee of the confidence of our customers and all our business relationships.

EXAMPLE 1: SELECTION PROCESS

As head of purchasing, I was responsible for selecting a new service provider following a call for tenders issued by the bank. After analysing the various candidates, it emerges that one of them has been involved in fraud. Should I take this information into account in the selection process?

Absolutely. The entities of the CCF Group make every effort to ensure that all its partners share a high level of ethics, professional conduct and good repute. The involvement of a potential partner in a case of fraud would be likely to damage the good reputation and integrity of our Group. We therefore take care to work with partners who share the values and principles we uphold.

EXAMPLE 2: PUBLICATION OF INFORMATION OR IMAGES

I attended the fast regional convention organised by the bank. I would like to publish photos of the event on my linkedin.

There are no general prohibition or authorisation rules. You should consider the risk that such a publication could harm your reputation, that of the company or that of a third party. So ask yourself the right questions. You must respect the image rights of those present, and ensure that they have given their consent. You must also ensure that no confidential information is divulged through your publication. In this case, the publication of a professional event does not contravene the company's ethical rules.

- Our exemplary behaviour has a positive impact on the image and reputation of our company, the trust placed in us and the sustainability and growth of our business.

- We are responsible for the compliance of our actions and decisions, and we act with full awareness of the consequences of our actions and decisions.

- We pay particular attention to the quality and good reputation of all our business relationships, whether with our customers or our partners. This attention is paid back at the outset and throughout the relationship. We invite all our customers and partners to share these same values.

- We take care to communicate responsibly in order to preserve the CCF Group's brand and image.

- We make judicious and careful use of all the means of communication at our disposal (Internet, media, social networks, etc.). Information shared must not be defamatory or insulting, not must it damage the integrity or reputation of the Group, its employees or its business relations.

- We comply with all the procedures in force and the associated controls, in order to prevent any reputational risk resulting from a regulatory failure or human or organisational dysfunction.

- We conduct our business in compliance with the banking and financial obligations applicable to our profession. We cooperate with the regulatory authorities to prevent reputational risk.

Managing relations with third parties

Customer's interests first

Promote our customers' interests at all times, so that the CCF Group and its subsidiaries are recognised as a responsible and trusted bank.

We are committed to ensuring the satisfaction and protection of our customers, and take a responsible approach on a daily basis. Listening to our customers' needs, advising them independently, informing them clearly and transparently, and finding a suitable solution for them are at the heart of our commitments.

EXAMPLE 1: INFORMATION GIVEN TO THE CUSTOMER

A customer wants to take out a life insurance product. He tells me that he has high profitability requirements but wants to take very little risk. Can I suggest that he invest in equity-only funds with attractive returns?

No. Equities are risky, highly volatile products that can result in the total loss of the capital invested. In this case, the advice offered would be inappropriate for the customer's risk appetite. We must ensure that customers are properly informed and that the explanations given are fair, so that they can correctly assess the advantages, disadvantages and risks of a product.

EXAMPLE 2: VULNERABLE CUSTOMERS

I've been contacted by a customer who wants to take out a loan to buy a new car. It appears that such a project could put him in financial difficulty, given the loans already taken out. The customer, who is well known to the CCF Group, assures me that I can trust him, as he has "always paid his instalments on time". Can I accept the loan application?

No. You need to check the customer's ability to pay and offer him a product suited to his situation. Despite the long-standing business relationship and the absence of any payment incidents, granting a new loan would place the customer in financial difficulty and affect his ability to honour his commitments in the future. It is our responsibility to explain to them why such a project is not in their best interests. You must then guide them towards a more suitable solution.

- In every decision we take, we strive to serve and protect the best interests of our customers. We act with respect and honesty, to ensure that they are treated fairly and to build long-term relationships based on trust.

- We provide them with our expertise and propose responsible solutions adapted to their needs and situation. We advise our customers, taking into account the service or product on offer, their profile, their needs and their level of knowledge and experience in the field.

- We work with our customers in financial difficulty to find the best solution. If our customers' wishes run counter to their interests, we do not hesitate to redirect them or decline their request.

- We take great care to communicate transparently and to ensure that the information provided to customers is clear, accurate and not misleading. This enables our customers to make an informed decision by appreciating the potential risks and the scope of their commitment.

- We are committed to fair and ethical practices in the sale and promotion of our products and services.

- In the event of a dispute, we undertake to respond to our customers' complaints fairly and promptly. We apply corrective measures to remedy any shortcomings identified.

Building relationships of trust with third parties

Promote free and fair competition and maintain equitable relations with our partners and interlocutors, in the interests of our customers.

We strive to build relationships of trust with our business partners, looking after the interests of each party. Our suppliers and service providers are chosen in accordance with the principle of fairness and the rules governing free competition.

EXAMPLE: COMPLIANCE WITH THE PRINCIPLE OF FAIRNESS IN A CALL FOR TENDERS

The bank wants to implement a new IT tool. As part of a call for tenders, one of the companies interviewed, with whom we are used to working, asks me for information on the content or level of response from the other companies taking part in the call for tenders, so that it can adjust its proposal. Can I pass on this information?

No. The choice of supplier must be fair, and the result of fair competition between the companies interviewed as part of a call for tenders. Each of these companies must be offered the same level of information. Moreover, the communication of such information would be in breach of professional secrecy.

- The interests of our customers constantly guide the way we conduct our business relationships.

- We promote free and fair competition, and act with integrity towards our partners with a view to establishing relationships based on trust.

- Our business partners are selected fairly. It is based on objective factors that ensure their qualifications, reputation and adherence to our ethical rules.

- In the context of a call for tenders, we respect the principles of fairness, impartiality and transparency: the choice of our service providers and suppliers is the result of fair competition between the companies interviewed.

- When we respond to a call for tenders, we position ourselves exclusively on the basis of our expertise and the quality of our advice, products and services, prohibiting any competitive advantage derived from unfair or even illegal practices.

- We refuse to enter into any agreements or understandings with any competitor, whether formal or informal, oral or written, which may affect competition.

- More generally, we prohibit any behaviour likely to distort competition or based on purely personal interests on the part of our employees, partners and contacts.



Liability and prevention of criminal behaviour

Prevention and managing conflicts of interest

Prevent and manage the risks of conflicts of interest, in order to preserve the relationship of trust with our business partners, customers and shareholders.

Any situation that represents a potential or actual conflict of interest, or that only has the appearance of one, may harm the reputation of our Group and the interests of the client. Our procedures are designed to prevent such conflicts and to ensure that our decisions are not inappropriately influenced and do not satisfy a particular interest.

EXAMPLE 1 : INFORMATION GIVEN TO THE CUSTOMER

I've learnt that my brother, who runs a software publishing company, would like to respond to a call for tenders issued by the CCF Group. What do I have to do?

You must inform your manager of this relationship and report it immediately to the Compliance Department. Compliance will propose measures to manage and supervise any conflict. Under no circumstances should you be involved in the selection process.

EXAMPLE 2 :

I hold shares in a service provider that has a contract with the CCF Group. What do I have to do?

You must report this situation immediately to your manager and to the Compliance Department. Compliance will propose measures to manage and supervise any conflict. You must also refrain from taking part in decisions on matters that could give rise to a conflict of interest.

- Employees undertake to obtain prior authorisation before exercising any corporate office or remunerated activity outside the company. They must disclose any significant interest they may have in a company related to the Group.

- When a conflict arises that affects a customer, we inform them so that they can make an informed decision.

- We have an active policy of preventing conflicts of interest. We put in place measures to guard against this risk and to identify conflicts that may arise.

- In conducting our business, we take care not to put any particular interest ahead of another. We act in such a way as to avoid any interference between our professional activity and considerations of a personal nature (family, financial, political, etc.).

- All future acquisitions are subject to due diligence. The purpose of this verification is to ensure compliance with regulatory and ethical obligations, particularly in terms of conflicts of interest.

- We ensure that any launch of a new product or activity is the subject of a detailed presentation to the Commitments Committee. The Compliance Department is kept informed of any significant changes.

- Before entering into any transaction, we first check that the Group is not in a situation of conflict of interest.

- If a conflict cannot be avoided, we implement appropriate remedial measures to put an end to it or minimise the associated risk.

- Our employees are asked to declare any conflict of interest that concerns them and to refrain from taking part in decision-making on such matters. They can pass on the information to their line managers or to the Compliance Department by completing the Conflict of Interest Declaration Form on the My Compliance Declarations tool.

Combating corruption and influence peddling

Actively fight corruption and influence peddling, and act in a way that leaves no doubt as to our integrity and professional ethics.

The CCF Group has a zero tolerance policy on corruption. We are committed to conducting our business with honesty and in compliance with the law. More generally, any breach of probity is prohibited within our company and in relations with our business partners.

EXEMPLE 1 :

Un A supplier is offering me tickets to attend the final of a sporting event. Can I accept them?

You should refer to the CCF Group's "Gifts and Benefits" rules, which set out the criteria for accepting this type of gift. If you have any doubts, you should seek advice from your line manager or the Compliance Department. Furthermore, if you suspect that the gift is intended to influence your decision or behaviour, you must refuse it and inform your manager immediately.

EXEMPLE 2 :

I was contacted by a new prospect with a view to negotiating a property deal. During a business lunch, he mentioned his nephew's difficulties in finding a work placement. He suggests that he would be delighted to sign a contract with me if I could do him a favour and recruit his nephew. Can I consider offering him an internship?

No. The CCF Group ensures a fair recruitment process, based on objective factors. All recruitment, whether permanent or temporary, must follow the HR process. Any advantage that has the effect of influencing a decision could be considered an act of corruption, undue or even illegal.

- We combat all forms of corruption and influence peddling, whether direct or indirect, active or passive, i.e. whether perpetrated by the briber or the bribed, and adhere to rigorous ethical standards in this area.
- We act impartially and ensure that any payment or benefit from or to a third party is properly justified, documented and authorised.
- We safeguard our independence by refusing to offer or accept any gift or benefit that is undue or that exceeds the thresholds set by the company.
- We refrain from offering or accepting any invitation that is inappropriate or exceeds the thresholds set by the Group.
- Participation in various events organised by suppliers or service providers requires prior authorisation.
- Our employees are asked not to yield to pressure or solicitations from third parties and to inform their line manager and the Compliance Department of their entity.
- We undertake to comply with internal policies and procedures and to report any improper behaviour by exercising our whistleblowing powers.
- In order to preserve the relationship of trust with our business relations, we exercise constant vigilance and assess the exposure of our customers, intermediaries and suppliers to the risk of corruption.

Combating money laundering and the financing of terrorism

Ensuring financial security and compliance with embargoes, preventing all forms of fraud in order to protect our customers, and participating in the fight against the financing of terrorism.

The fight against money or asset laundering, tax fraud and the financing of terrorism is a priority for the CCF Group. We ensure strict compliance with the standards to which we are subject in order to effectively combat all forms of criminal and terrorist activity.

EXAMPLE 1: SOURCE OF FUNDS

As part of my credit repurchase business, I was contacted by a customer who wanted to repay his last two years of credit early. He told me that the money had come from his savings, but he hadn't been able to provide any supporting documents. What should I do?

Tracfin considers that unjustified early repayment may fall into the category of atypical transactions requiring particular vigilance. In such cases, it is important to understand how the savings were built up and to obtain proof of their origin. If a customer refuses to provide this proof, the bank will not be able to meet its obligations to prevent money laundering, and may have to report suspicions to Tracfin.

- As a bank, we are required by law to report to Tracfin, the national financial intelligence unit, any transaction or attempted transaction that could be construed as money laundering or terrorist financing.

- Each of us is constantly vigilant to prevent and detect any suspicious financial flows, and to report them immediately to our line manager and to Compliance.

- In this respect, we would like to warn you of any prejudice that a failure to carry out checks could cause, in terms of financial or administrative penalties, up to and including withdrawal of authorisation, and which would be detrimental to all our customers.

- We ensure that our business relationships are based on trust by knowing not only our customers (KYC - Know Your Customer), but also our suppliers and other business partners. For example, we require all our customers to provide valid identification information, such as identity papers, residence documents, etc.

- We define criteria to assess the level of risk associated with each customer, based on factors such as their financial profile, professional activity, country of origin and business relationships. This enables the bank to take appropriate measures to manage the risks identified.

- In order to get to know our customers and understand their transactions, we are required to verify their identity and also to collect any supporting documents that enable us to understand the nature of the transactions.



EXAMPLE 2: KYC - CUSTOMER KNOWLEDGE OBLIGATION

As a customer of the bank, I opened a deposit account and provided all the necessary documents. However, a year later, the bank is asking me to provide proof of my income again. Why am I being asked to do this?

My bank is subject to a number of regulatory obligations, including the obligation to have up-to-date knowledge of its customers in order to prevent the risk of fraud, money laundering and the financing of terrorism. This obligation requires the bank to regularly update the information it holds on you, particularly information about your identity, address and income.

- We monitor the financial flows in which we are involved, in compliance with the law on the protection of privacy, the fundamental rights and freedoms of individuals, and professional secrecy.

- As part of the fight against the financing of terrorism, we comply with the obligation to freeze the assets of any person involved in the financing or preparation of terrorist acts.

- In the same way, we apply trade restriction measures taken against certain countries (embargoes) and international economic sanctions in force.



Tax liability

In keeping of the ethical and social footprint of the CCF Group and its subsidiaries, we wish to fully assert our fiscal integrity and, together with our employees and partners, adopt a fiscally responsible approach.

The CCF Group demonstrates its commitment to tax compliance, transparency and integrity, and implements a tax policy that contributes to international objectives in terms of social and environmental responsibility and sustainable development.

EXEMPLE 1 :

A customer wants to make an investment that will give him an undue tax advantage. Can the customer make the investment with CCF Group?

No. The Group, through its customer advisers in particular, is careful to inform its customers of their tax obligations relating to the products they subscribe to, and does not encourage or promote tax evasion.

EXEMPLE 2 :

The tax authorities are requesting a number of documents justifying certain transactions covered by the audit. What documents can I provide?

Subject to the agreement and validation of the Tax Department, I can provide all the necessary information in full transparency and in compliance with legal provisions. Our decisions are taken at the right hierarchical level and are properly documented to highlight the facts and our analysis of the tax treatment applied.

- We cooperate fully with the tax authorities, providing the information requested and participating in any tax audit or investigation. We are committed to maintaining a professional and transparent relationship with the tax authorities.

- The CCF Group undertakes to comply with tax laws and regulations applicable in the countries in which it operates. The Group ensures the proper collection and payment of taxes on income, profits, VAT and any other taxes and contributions required.

- We undertake not to engage in tax avoidance practices, such as the improper use of aggressive tax optimisation schemes or tax havens. We will ensure that tax activities are based on principles of fairness and compliance with applicable tax rules.

- We undertake not to provide tax advice to our customers as part of the banking relationship and we inform them of the tax obligations relating to the transactions carried out, particularly in terms of reporting obligations.

- We undertake to comply strictly with French and international regulations relating to tax transparency (including CRS, FATCA and DAC 6), in order to combat tax evasion.

- We integrate the fight against tax fraud into the fight against money laundering, in accordance with regulations.

- The Tax Department validates the tax treatment of transactions. Specific control procedures are put in place to validate the tax returns filed by the Group. In this respect, the management bodies adhere to the Group's tax commitments.

Respect integrity of financial markets

Maintain the stability of the financial markets, so that they continue to operate smoothly and protect the interests of investors.

As a responsible bank, we ensure compliance with the rules and principles that govern the integrity and transparency of the financial markets.

EXAMPLE 1: BEST EXECUTION

As a securities account holder, I have just placed an order with my bank for a major transaction. Given the volatility of the financial markets, I would like this transaction to take place as quickly as possible. What guarantees can my bank give me?

We act in accordance with the “best execution” obligation. We take all reasonable steps to obtain the best possible result for our customers. The bank undertakes to process your order promptly. It will also ensure that the order is executed on the best possible terms, taking into account the cost, probability of execution, size and nature of the order, etc.

EXAMPLE 2: INSIDER INFORMATION

One of my clients, the Finance Director of a listed company, informs me in confidence that the company is going to acquire a competitor. Knowing that this is a high-risk transaction, I want to take advantage of this information to sell the shares I hold in the company being acquired. Do I have the right to do so?

No. The information provided by the customer is privileged information: it is not public and may have an impact on the market value of the financial security. It may not be used for personal purposes or divulged to persons who are not entitled to it. All Group employees must refrain from exploiting inside information in their possession, either for their own benefit or for that of a third party.

- When providing investment services, we act honestly, fairly and professionally with due skill, care and diligence in the best interests of our clients.

- We implement ‘best selection’ and ‘best execution’ policies aimed at obtaining the best possible result for our customers in terms of intermediary selection and order execution. We carry out an annual evaluation to assess the quality of service provided by our intermediaries.

- The investment strategy we propose to our clients is systematically based on an assessment of their situation and their knowledge and experience of the financial markets. It is also based on their objectives, investment horizon and risk appetite.

- Market abuse, including price manipulation and the disclosure of insider information, violates the integrity of the markets and fairness between investors. We take all necessary measures to detect such abusive behaviour and report it to the Autorité des Marchés Financiers.

- All “inside” information concerning a listed security, which is likely to have an influence on the share price, must remain strictly confidential. Accordingly, each of us personally undertakes not to carry out any stock market transaction based on inside information obtained in the course of our business.

- The Bank has procedures in place to ensure the confidentiality of inside information. Our employees undertake to respect these procedures and to refrain from divulging any insider information.

- Personal transactions carried out by our employees are supervised to prevent any misuse of insider information for personal purposes.

Asset and data protection

Protecting all customer and company assets and data, with a view to strengthening the company's solidity and preserving the confidence of its business relationships..

We are all committed to protecting the Group's assets, both tangible and intangible. We ensure the confidentiality of information and the protection of data in order to preserve the continuity of our activities and the trust placed in us.

EXAMPLE 1: PERSONAL DATA

I receive a letter from a customer who wants to know whether data concerning him or her appears in our computerised or manual files and, if so, to obtain a copy. What should I do?

The customer is within his rights. People affected by the processing of personal data have the right to retain control of their data. Any request by a customer to exercise their rights in relation to personal data must be addressed to the consumer department authorised to deal with it, in consultation with the Data Privacy unit. They will respond to the customer's request.



- All employees strictly observe banking secrecy and the confidentiality of relations with our customers and partners. Any unauthorised disclosure of banking and personal information is strictly prohibited.

- The activities carried out by the CCF Group involve collecting a certain amount of data, in particular to enable us to provide products and services that are best suited to our customers. This data is processed fairly and transparently, solely for a specific and legitimate purpose.

- We are committed to complying with the principles and obligations of the General Data Protection Regulation (GDPR) with regard to the protection of personal data.

- We implement appropriate technical and organisational security measures to ensure the protection and responsible use of all information and data collected, whether it concerns our customers, our partners, our company or our employees.

- A Data Protection Officer (DPO) is appointed within the Group to play a key role in implementing and monitoring compliance with the GDPR. The DPO is responsible for advising and informing the organisation of its data protection obligations, ensuring employee awareness and dealing with data protection queries and complaints.

- We implement procedures to prevent any loss, unauthorised use or disclosure of this data personal.

EXAMPLE 2: BANKING SECRECY

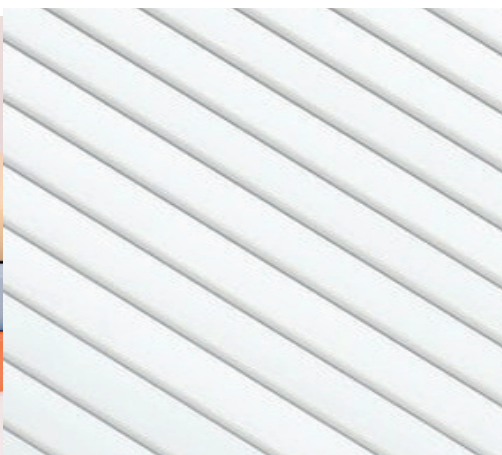
I was contacted by the spouse of a customer who had learned that the latter had recently opened a term account with our bank. Wishing to have a clearer picture of the couple's finances, he would like to obtain the account balance. Am I allowed to give it to him?

No. You are bound by banking secrecy and must protect your customers' privacy. You may not divulge any personal information about them. If the account was opened in the customer's name alone, you cannot share this information with their spouse, unless they have power of attorney to act on the account. On the other hand, if the account is a joint account, you can share this information, as the customer is a joint holder of the account. In all cases, no information may be shared with a third party not authorised by the customer.

- We ensure that our employees and customers are able to exercise their rights in accordance with personal data protection regulations. We also refrain from using confidential information for personal purposes, or from communicating this information to anyone who should not have access to it.

- We undertake not to damage or misuse for personal purposes the premises and work tools made available to us, and to protect all property to the best of our ability in order to preserve its value.

- We also have an Emergency and Business Continuity Plan designed to ensure the continuity of our activities in the event of a crisis, in order to maintain the quality of service we offer our customers. We carry out regular tests to assess the robustness of our system.



Social and environmental responsibility

Social and environmental responsibility

Participate in the development of the CCF Group and its subsidiaries by fully playing our role as a corporate citizen with our employees, customers and partners.

This commitment, which creates value, should enable us to achieve excellence in our relations with our customers, partners and employees. The CCF Group is particularly committed to respecting and protecting the environment in order to contribute to a sustainable society.

MY CLIMATE SCHOOL

Committed to its role as a good corporate citizen and to integrating environmental concerns into its strategy, CCF Group has a role to play both as a bank and as an employer in contributing to a more sustainable society.

Our Group has therefore decided to raise its employees' awareness of the climate issue by launching a dedicated training course. My Climate School is an interactive 100% online course designed to help you understand the complex issues surrounding climate change and prepare to take action.

ESG RATING

The Professional Mortgage business Line has developed an in-house ESG rating model to measure the Environmental, Social and Governance characteristics (extra-financial criteria) of each property transaction financed.

This rating tool, used for all new property transactions, helps to improve the management and steering of ESG risks within the bank.

- We aim to integrate environmental, social and governance (ESG) criteria into our development and our activities.

- Our commitments to social and environmental responsibility, sustainable development and respect for human rights are shared by all our employees.

- We work with our customers to help them meet their environmental challenges, in particular by offering them products and services with an environmental dimension.

- For example, we have launched a green financing offer through our Professional Mortgage business line. This is part of our commitment to contributing to the energy transition of our professional real estate customers.

- The ESG Committee brings together various members of the Company's Board of Directors. Its main task is to assist the Board of Directors, and to establish the principles of the Company's ESG policy and those of the regulated entities.

- Each and every one of us ensures that we use the company's resources responsibly and, where appropriate, takes the environmental dimension into account in our decisions. In particular, we ensure that we have a responsible consumption policy: paper, IT equipment, combating waste.

- We expect our employees to drive change through both their professional and personal commitment.

Diversity and inclusion

Promoting a culture of inclusion at all levels of the Group's organisation and creating an inclusive environment where our employees, customers and partners can thrive and reach their full potential.

CCF Group is firmly committed to inclusion and diversity. We believe that every individual deserves to be treated with fairness and respect, regardless of their ethnic origin, gender, religion, sexual orientation, gender identity, disability or any other attribute protected by law.

CAP Pluriel

Within the Group, there is a community in favour of diversity and inclusion, open to all employees. It is committed to 4 major themes:

- Promoting diversity and inclusion through events organised throughout the year for employees on the themes of diversity and inclusion: cognitive bias, disability, neurodiversity, internal mentoring, etc.*
- Supporting the disabled and promoting inclusion through sport by sponsoring associations such as HOPE through a sponsorship partnership.*
- Supporting equal opportunities and social diversity by offering mentoring to students on a voluntary basis, in partnership with the PROXITE association, which works to promote access to education and employment.*
- Encourage and develop female talent through the ELLE by Groupe CCF programme, which provides training for female employees on topics such as leadership, negotiation, personal branding, etc.*

SPEED MENTORING

CAP Pluriel has launched SPEED MENTORING, informal get-togethers designed to enable employees to benefit from the professional and personal experience of other employees and to exchange views on all kinds of subjects: professional or personal development, advice, experience sharing, etc.

- We are committed to respecting and valuing the diversity of our employees. We reject all forms of discrimination, whether based on age, ethnicity, religion, disability, sexual orientation or gender. We encourage an inclusive and respectful working environment where everyone feels safe and accepted.

- We are committed to equal opportunities for all our employees, regardless of their origin, gender or personal circumstances. We recruit, develop and promote our employees on the basis of their skills, experience and performance, without discrimination.

- We strive to make our products and services accessible to all our customers, taking into account the needs of people with disabilities or special needs. We are committed to providing reasonable accommodation to ensure a fair and inclusive banking experience.

- We encourage awareness-raising and training on inclusion and diversity issues for all our employees. We are committed to combating prejudice, stereotypes and discrimination.

- We support initiatives to promote inclusion and enhance diversity in the regions where we operate. We work with local organisations to promote equal opportunities and contribute to fairer, more inclusive societies.

- We are committed to integrating these principles into all our practices and policies, and we encourage our employees to be ambassadors of inclusion both within our organisation and in our interactions with our customers and suppliers.

Health and safety at work and combating harassment

Guaranteeing a working environment that respects everyone's health and safety is a priority for the CCF Group.

Convinced that working conditions have a direct impact on health and motivation, our Group provides a healthy and safe working environment for its employees. In particular, the CCF Group is committed to combating all forms of harassment. Safety at work also depends on each and every one of us.

EXAMPLE 1: COMPLIANCE WITH SAFETY RULES

Building evacuation drills are held regularly. I've taken part in all of them since I joined the company. I'm currently working on a very important project, which involves a lot of meetings. If I'm in a meeting with people from outside the company during a forthcoming exercise, I plan not to leave the room. Am I right?

No. The safety rules apply to all persons present on the premises, whether employees or external to the Company. You must therefore evacuate, as must all other participants. Safety is the absolute priority in all circumstances.

EXAMPLE 2: BENEVOLENT VIGILANCE

On several occasions I have witnessed humiliating comments made to one of my colleagues. Although the comments were made in jest, they are making the person to whom they are addressed feel uncomfortable. How can I help?

If you feel comfortable enough, you can intervene to put a stop to this behaviour. You can also, in complete confidentiality, report the matter to your Manager or to your Human Resources contacts, who will intervene if necessary. It is essential to avoid this type of situation, which is contrary to the Group's human commitments.

• We take the necessary measures to ensure the safety and protect the physical and mental health of everyone in the working environment.

• We value the health and well-being of our employees and actively encourage healthy lifestyles by offering resources and programmes focused on mental health, stress management, work-life balance and physical activity.

• We put in place leave and flexibility policies that allow employees to take care of themselves and their families, while respecting their professional obligations.

• To contribute to effective prevention, everyone must comply at all times with the safety rules in force within the Company.

• We put in place policies and practices that encourage a balanced distribution of tasks and responsibilities, to avoid excessive workloads.

• We encourage transparent communication between employees and their line managers to ensure that individual workloads are managed effectively.

• We train our managers to exercise their responsibilities with kindness and respect, in order to prevent any inappropriate behaviour. They listen to their teams and take everyone's opinions and contributions into consideration.

• We prohibit all forms of harassment, both sexual and moral. Our motto: "zero tolerance of this type of behaviour"!

• We encourage any employee concerned by or witness to a situation of harassment to contact the Human Resources Department or their manager. They can also use the whistleblowing procedure.

Professional alert systeme

To ensure that the Group's whistleblowing system complies with the highest standards of ethics and responsibility, and is accessible to employees and partners.

The CCF Group has implemented a whistleblowing system, which is an essential mechanism in our code of ethics, designed to enable our employees to report in confidence any reprehensible or unethical conduct within our organisation. This ensures an honest, transparent and accountable working environment.

- We provide our employees with a communication channel for filing business alerts via a secure tool. We ensure that our employees are regularly informed about this reporting mechanism and that access to it is easy.
- We undertake to maintain absolute confidentiality and to protect the identity of whistleblowers. We ensure that people who report ethical concerns in good faith do not suffer any form of reprisal or discrimination.
- Every whistleblower we receive is treated promptly and fairly. We have put in place clear procedures to assess and investigate each report objectively and rigorously. The people responsible for conducting these investigations are qualified, impartial and independent.

- The results of investigations are communicated appropriately. Where a whistleblower is substantiated, corrective action is taken to remedy the problems identified. We keep whistleblowers informed of the measures taken, within the limits of confidentiality and the protection of the parties involved.
- We attach particular importance to raising awareness and training our employees on the whistleblowing system. We provide regular training on professional ethics, misconduct and whistleblowing procedures.
- We are committed to the continuous improvement of our whistleblowing system. We regularly evaluate its effectiveness, gathering feedback from employees and taking into account industry best practice.

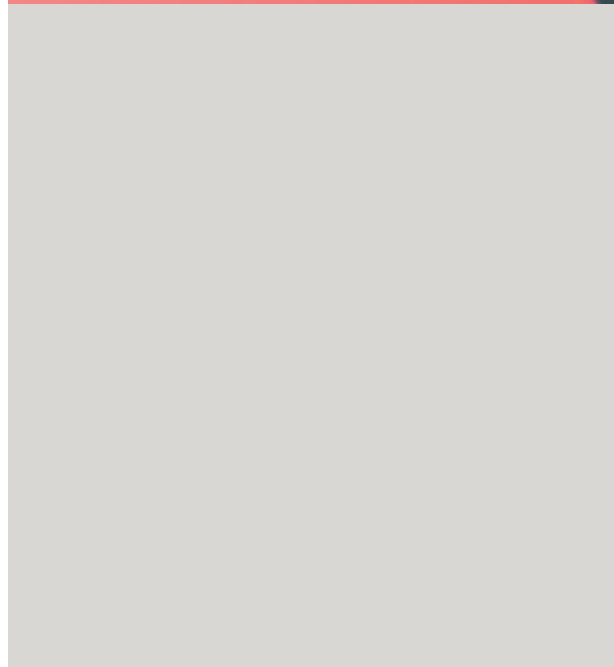
Alerte (••) Professionnelle

The professional alert system is accessible on the CCF Group corporate website.

www.groupeccf.fr

Personal data and RGPD

For any request or question relating to your personal data, you can contact your consumer service. You can also contact the Data Protection Officer, whose contact details can be found on your bank's website in the "Information Technology and Civil Liberties" section.



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