

CODE of CONDUCT



ASSURANCES



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I. | Our COMMITMENTS



Philippe Dumont - Chief Executive Officer of Crédit Agricole Assurances

In May 2017, Crédit Agricole published a Group-wide Ethical Charter underscoring our values with regard to customer focus, responsibility and solidarity. This reference document sets out principles regarding the actions and behaviour to be followed vis-à-vis our customers and all our stakeholders including employees, suppliers, service providers, state representatives, associations and NGOs, shareholders and investors.

As a business subsidiary of Crédit Agricole S.A., Crédit Agricole Assurances (CAA) meets all of its customers' insurance requirements through three main business activities: Savings/Retirement, Death and Disability/Creditor/Group Insurance and Property and Casualty Insurance.

While the Ethical Charter sets out our commitments, identity and values as well as the principles underpinning our actions, our Code of Conduct puts into practice the commitments set out in the Charter which is the foundation of the ethical and professional conduct to be respected by everybody in the Group.

The Code of Conduct, which was first published in 2018, is designed to provide guidance in our everyday actions, decisions and behaviour. It is the fruit of a collaborative approach involving the various business lines in Crédit Agricole Assurances and a joint development process which has mobilised contacts in the support functions (Procurement, Public Affairs, Communications, Compliance, Investments, Legal Affairs and Human Resources, etc.) and expert functions within the Group's three key business lines.

In addition to the application of all the legal, regulatory and professional rules governing our various activities, the Code of Conduct reflects our determination to do even more to serve our customers and all of our stakeholders in the best way possible. We are now making the second version of this Code available to you. It has been updated, firstly, to take account of regulatory changes regarding harassment and, secondly, further informations regarding the protection of employee data and combating corruption, in particular.

Please read it carefully and actively put it into practice!



II.

Using our
CODE of CONDUCT

The Crédit Agricole Assurances Code of Conduct is a tool and a guide that enables us to clarify our professional obligations and adopt a line of conduct that is consistent with the ethics and values of the Crédit Agricole Group.

Who does the code apply to?

The Code of Conduct applies to everyone, be they directors, managers or employees, regardless of their position and function within Crédit Agricole Assurances.

What are the objectives of the Code and how should it be interpreted?

The Code of Conduct has been drawn up to guide us in our actions and help us make decisions in accordance with the Group's ethical rules and values and with legislation. It explains, by topic, the professional behaviour to be followed and promoted in carrying out our duties and in our working relationships. The various topics are classified into four sections: "relations with customers and suppliers"; "social, environmental and societal issues"; "anti-corruption"; and "protection and reputation of the Group". Note that conflicts of interest, which is a cross-functional topic, is included in the anti-corruption section. To provide further information, some practical cases have been cited to illustrate, using specific examples, the principles presented in the Code. Nevertheless, the Code of Conduct is not intended to be exhaustive. Neither does it claim to answer all questions or address all possible cases, particularly with regard to what you should and should not do. For this reason, in all situations and when making decisions, everyone should ask themselves the following questions:

FIVE QUESTIONS TO ASK YOURSELF TO ENSURE YOUR BEHAVIOUR IS ETHICAL

- 1** Is it legal?
- 2** Is it in line with the Group's Ethical Charter and Code of Conduct?
- 3** Is it in the interest of our customers and stakeholders?
- 4** Have I taken into account the risks involved and what the consequences of my decision could be?
- 5** Would I be comfortable if my decision were to be made public internally and externally?

If the answer to any of these questions is "no", or if in doubt, you must discuss it with someone before taking action. You may approach your Manager, or contact the Legal Affairs, Communications, Compliance, or Human Resources departments, or any other department qualified to deal with the issue at hand and keep a record of all problems encountered.

Who supervises the implementation of the code? Who updates it?

A multi-disciplinary team backed by the Heads of Communications, Compliance and Human Resources is responsible for implementing, monitoring and updating the Code of Conduct. This team liaises with the departments concerned in order to provide annual feedback to the Management Committee of Crédit Agricole Assurances which in turn reports to the Board of Directors. The contents of the Code may change over time. The Code does not replace the internal regulations and procedures of Crédit Agricole Assurances. It is your duty and responsibility to consult and apply them.

How is the Code of Conduct made available? What is its visibility?

The Code of Conduct is a document that is made public and shared with stakeholders. It is available on Crédit Agricole Assurances' website and Intranet.

What are the employees' obligations?

Everyone must familiarise themselves with the principles set out in the Code of Conduct and adhere to them in the performance of their duties. In addition, everybody must transmit and promote the values and principles presented in the Code of Conduct, with vigilance and good intentions. Moreover, everybody must follow the training programmes offered on topics related to the Code of Conduct (such as fraud, corruption, international sanctions).

ONE KEY RULE TO REMEMBER

Whenever you notice or suspect an inappropriate act or form of behaviour, or when you feel under pressure, you must immediately talk about it with your manager.



What is whistleblowing?

The aim of the whistleblowing system is to strengthen risk prevention by giving all internal and external employees and commercial partners the means to report the facts that fall within the scope of application of the “whistleblowing” procedure. An internal whistleblowing procedure designed to collect alert notifications has been set up.

What is the role of managers and what is expected of them?

As a manager, you must ensure your team knows you are always there to listen to their needs and create a climate of trust so that they will not hesitate to seek your advice if they have a problem. You

have to be able to explain the functions of the Code and how to apply them. For this, you will need to refer to the Code of Conduct, as well as the Ethical Charter and the Internal Regulations. If you have any questions, don't hesitate to consult the department most qualified to deal with the issue at hand (Communications, Compliance, Human Resources, or any other appropriate department). You must be vigilant, conduct yourself in a transparent manner, and be an example for your teams. Show that it is entirely possible to attain the objectives that have been set, while respecting the ethics and values of the Group.



III.

Using our ETHICS
on a daily basis:

The Code of CONDUCT



DEFINITION

Ethics fall into the moral scope referring to values, particularly those of the Company. These values should drive our decisions and our professional behaviour. Expressed as professional rules of conduct underpinning our activity, they define our ethical approach.



DETAILS

Ethics concern:

- company-specific values formulated as generic concepts (for example: respect for others, solidarity, etc.) and developed into the Company's "principles of action" (for example: the fight against discrimination);
- the approval and adoption of these values and the ethical framework by the highest level of corporate governance;
- a general mission to make known and enforce the values, principles and rules of conduct, in such a way that the ethical framework serves to ensure a feeling of belonging to the Company, and the trust necessary for life in the workplace and relations with stakeholders.

Compliance meets a requirement applicable to financial institutions and insurance companies. This is ensured via:

- the implementation of internal Company rules and procedures which implement laws and regulations;
- the existence of a prescription and control function performed by a senior manager, which enables the Company to prevent major non-compliance risks, particularly in regulated business sectors.

Ethics promote respect for values and rules of conduct. Compliance aims to prevent infringements of the ethical framework and the law, in order to protect the Company against sanctions and against any risk to its reputation (or image).



"ACTING IN AN ETHICAL MANNER" MEANS:

■ Being responsible in our relations with customers and suppliers

All relations must be established in accordance with the principles of loyalty and solidarity, and with the commitments made to our customers and

suppliers. Decisions must be made by prioritising customers' interests, respecting the principle of fair and equitable choice of suppliers and the rules of competition

■ Respect for individuals

With regard to relations between Company employees or with all of its stakeholders, human rights and people's fundamental social rights must be rigorously applied.

Preventing all forms of discrimination or harassment, promoting diversity and gender equality, respecting health and safety measures, and ensuring the protection of employee and customer data: by respecting these principles we create a favourable working environment, which is a source of performance and satisfaction.

■ Respecting our environmental and societal commitments

For Crédit Agricole Assurances, this means providing our customers with services and solutions that are practical over the long term and sharing the value thus created, being part of the sustainability of the projects financed and investing in the regions. Particular attention is paid to "Green Finance" for the purposes of supporting the energy transition for a "low carbon" economy, while protecting nature.

All directors, executives, managers and employees act as ambassadors for the Group's Corporate Social Responsibility (CSR) approach which is designed to support the regions, strive for excellence in relations with customers, mutual shareholders and employees, and manage risks.

■ Preventing and detecting corruption and influence peddling

The fight against corruption is a major common-good objective. With regard to the prevention of corruption and influence peddling, Crédit Agricole Assurance must adhere to its values, in particular: honesty, integrity, loyalty, transparency and impartiality.

The anti-corruption component incorporates the fundamental principles of implementing appropriate measures to prevent, detect and deter corrupt practices or influence peddling by applying "zero tolerance". Other areas include gifts and invitations, facilitation payments, conflicts of interest, patronage, sponsorship and lobbying.



■ **Being vigilant on a daily basis**

To maintain trust, we must assume responsibility for the use that can be made of the available resources and information in the Company, and guard against any risk related to conflicts of interest. We must also ensure that we do not inappropriately disseminate or exploit, for our own account or on behalf of a third party, any confidential information that is held.

The vigilance of all must enable us to protect the interests of our customers, fight against money laundering and the financing of terrorism, respect the law on international sanctions, fight against tax evasion, prevent fraud and protect the integrity of the markets.

■ **Abstain from carrying out any actions that could damage the reputation of Crédit Agricole Assurances**

We are all responsible for ensuring the image of Crédit Agricole Assurances and of our Group at the internal and external levels. The risk of negative publicity, particularly on the social networks, could potentially damage Crédit Agricole Assurances' image and erode the trust our customers place in our Group.

To avoid this, we must take care to preserve our reputation by respecting all the principles set out in this code, by ensuring that we do not make any remarks that could commit the Group, divulge any confidential information about its professional environment or be party to spreading rumours.



Relations with customers and suppliers

1. | Customer relations



DEFINITION

The Crédit Agricole Group places the trust and satisfaction of its customers and mutual shareholders at the heart of its actions. Crédit Agricole Assurances wants all of its employees to be involved in this relationship, bearing in mind that the interest of the customer is the priority in all actions carried out by its employees, including those who exercise a support function for the Group.



DETAILS

To ensure that customer expectations are met, Crédit Agricole Assurances organises co-creation workshops, and conducts customer-satisfaction surveys in conjunction with the networks and business lines. Customer complaints are handled internally by the entities concerned, with a view to continually improving our services and striving for excellence in our customer relationships. In addition, training is regularly provided to employees whether or not they are in direct contact with customers.



CAA's COMMITMENT

Over time, the Crédit Agricole Assurances Group has developed to become a complete, diversified and international insurer providing services for its partners, in keeping with the positioning of the universal, customer-focused banking group, Crédit Agricole. In keeping with the Group's commitments, since 2010, Crédit Agricole Assurances has been deploying a socially responsible approach based on clearly identified issues in all its business lines and activities. The Crédit Agricole Assurances Group's services offering is designed to meet the major societal challenges, both in terms of the human and environmental aspects involved.

In addition, the Group constantly invests and innovates to develop and strengthen its customer relationships, particularly by way of its redesigned digital architecture. By choosing to adopt a multi-channel banking model that is 100% human and 100% digital, our aim is to offer our customers a new bank-insurance experience that combines efficiency and customer focus. This approach is fully in line with the protection of personal data.



WHAT SHOULD I DO?

- Listen to customers and take their interests into account in every action you propose;
- Know your customers needs, while respecting their right to privacy, so that you can provide appropriate advice and support;
- Always provide customers with clear and accurate information that is not misleading;
- Request that a NAP Committee (New Products/ New Activities) analyse all newly-marketed activities, products and services, or any major modifications, in order to ensure compliance with legal and regulatory requirements, by defining the target market and ensuring that customer information is of high quality;
- Be vigilant to prevent all forms of fraud in order to protect customers, and fight against money laundering, the financing of terrorism and corruption;
- Report any malfunction or situation that could lead to a conflict of interests to your manager;
- Ensure compliance with the ethical commitments of insurance company members of the French Federation of Insurance (FFA).



WHAT SHOULDN'T I DO?

- Place your personal interests or those of the Crédit Agricole Assurances Group before those of our customers;
- Facilitate, encourage or assist customers in any actions intended to infringe laws and regulations;
- Propose a product that has not yet been authorised by a NAP Committee.



EXAMPLES

A new life insurance contract is going to be developed. What precautions should I take?

During the development phase, the insurer must identify a target market and perform tests in order to determine that the product fully meets the needs, characteristics and objectives of the target customers.

After reviewing my new product proposal, the NAP Committee issued a condition. Given that for reasons of competition, this new product

should be launched rapidly within the next few days, can I still market it?

No, the NAP process is an essential mechanism for ensuring customer interests are protected and avoiding marketing products that could cause them harm. If, after verifying the risks and compliance, the NAP Committee gives a conditional agreement, the restrictive clauses thus issued are of a blocking nature. You cannot, therefore, market the product or service until all conditions have been lifted.

2. Customers' personal data



DEFINITION

The Crédit Agricole Group has drawn up a Code on the use of its customers' personal data. This Code provides a reference framework for its employees who process this type of data. It is a reminder of the commitments made by the Group as well as the best practices to be observed.



CAA's COMMITMENT

The Crédit Agricole Group has taken a stand on the sensitive issue of personal data, by committing to act in an ethical and responsible manner and adopting a transparent and instructive approach in dealings with its customers.



WHAT SHOULD I DO?

- Inform the BU/SU contacts and, where appropriate, in the Data Protection Department (such as the Data Protection Officer) at the time of project start-up to ensure that we comply with all personal data protection regulations;
- In the same way, involve IT security experts and representatives in the project;

- Ensure the project is in accordance with the regulations in force with regard to the protection of personal data and the principles of the Charter: security, utility and loyalty, ethics, transparency and pedagogy, etc.;
- If in doubt, always contact the BU/SU contacts and, where appropriate, the Protection Department.



WHAT SHOULDN'T I DO?

- Propose a project that involves processing personal data without having verified the compliance of your project with the Personal Data Department;
- Make any use whatsoever of personal data that does not respect the key principles indicated in the Charter, or the values set out in Crédit Agricole Group's Customer Project;
- Process any personal data for unintended purposes or without the customer's prior knowledge;
- Fail to comply with the rules and recommendations put in place within the Group to ensure personal data security and confidentiality, particularly by giving unauthorized persons access to this data.

EXAMPLE

I have been asked to collect new data as part of a project that forms part of a data processing activity that is already under way. What should I do?

Before carrying out any operation, contact the Data Protection Department and, in order to facilitate their assessment, specify whether:

- the project involves any new objectives in addition to those that have already been determined;

- any new objectives are compatible, or incompatible, with existing ones;
- the new data collected is sensitive;
- the new categories of data collected or objectives pursued infringe upon the rights and freedoms of the persons concerned.

The Data Protection Department will then decide whether it is appropriate to analyse the impact on the person's privacy of processing this data and update the data processing register accordingly.

3. Fair and equitable choice of supplier



DEFINITION

Choosing a supplier in an equitable and fair manner above all requires ensuring that all services providers receive the same treatment.



DETAILS

The equitable choice of supplier must be made as a result of a fair competition between bidding companies within the context of a call for tenders. This choice must be based on objective elements that notably include the respect for human rights and fundamental freedoms.



CAA's COMMITMENT

For this choice to be fair, all companies must receive the same treatment from the buyer(s), the decision-maker(s) and/or any other employee of Crédit Agricole Assurances, that would be affected, and the choice must be based on objective elements.

This requires that buyers, decision-makers and/or any other employees of Crédit Agricole Assurances adopt a responsible and fair attitude with regard to all bidding companies during the call for tender process. Consequently, taking purely individual interests into consideration in selecting the chosen firm should be avoided.



WHAT SHOULD I DO?

- Report any potential risk of conflict of interests (for example, the presence of a family member working in one of the bidding companies in calls for tenders, etc.);
- Make sure that all respondent companies receive a response within a sufficient and identical time frame. To ensure this, distribute the call for tender dossiers after all the bidding companies have been identified and do not, within each tender round, add any more companies to the list once the call for tender has been launched;
- Ensure that all bidding companies interviewed receive the same initial and modified information, data and documentary materials (tender documents, specifications, technical documents, functional documents, etc.);
- In the event of oral interviews, ensure that all of the short-listed bidding companies are invited to one or more such sessions, the duration of which must be identical for each company interviewed.



WHAT SHOULDN'T I DO?

- During calls for tenders, provide information to only some of the companies approached;
- Give any of the bidding companies an indication of the content of the bids or the level of response of the other companies participating in the call for tenders;
- Accept any invitations, gifts or benefits in kind from one or more of the bidding companies during the call for tender or the contractual negotiations. Once the contractual negotiation phase has been completed, the “gifts and invitations” regime comes into force (see specific card on “Gifts and Invitations”);
- Change the selection criteria, and/ or the ranking weighting, after the date of receipt of the replies to the call for tenders.



EXAMPLES

I heard that during negotiating periods, no gifts may be accepted. Is that right?

Indeed, all gifts (even of an advertising nature) and invitations must automatically be refused. In absolute terms, this means that you must not accept any benefits in kind since this could distort your judgement when selecting your supplier.

I contacted and met with a company that meets my needs perfectly. It even came up with some additional proposals. I decided to forward the details of the company to a buyer in the Crédit Agricole Group so that it could become

included in the list of companies to be interviewed in the context of a call for tenders. Is this the right approach?

First of all, you have to summarise what you need then draft a specification note. A potential supplier cannot do this since they may be inclined to propose their solution, tools or services that would not necessarily correspond to your needs.

You must draw up, with the help of a buyer in the Crédit Agricole Assurances Group, the list of companies to be interviewed, and be supported by the buyer throughout the interviewing process (and subsequent post-interview phases), in order to find the supplier that best suits your needs.

4. Responsible relations with suppliers



DEFINITION

Reasonable due diligence is necessary to ensure that all players in the supply chain act in accordance with a certain number of commitments and principles, notably concerning the respect of human rights and fundamental freedoms, workplace regulations, the fight against all forms of discrimination, the promotion of diversity as well as the protection of the environment and business ethics. If a player in the supply chain fails to act in accordance with these commitments and principles, the Group's performance, reputation and image could be seriously affected.



CAA's COMMITMENT

The commitments and principles of Crédit Agricole Assurances include:

- financial equality: remunerating suppliers in accordance with applicable laws and regulations;
- equal treatment;
- transparency of our processes;
- promoting sustainable relations;
- preventing corruption, by adhering to rules known to suppliers;
- conducting a comprehensive cost analysis of all costs incurred over the lifetime of the goods or services;
- integrating social and environment (CSR) performance in supplier selection criteria;
- promoting the regions by selecting local suppliers when appropriate;
- implementing measures provided for in the event Outsourced Essential Services (PSEE).

The diversity of these commitments and principles not only involves Crédit Agricole Assurance buyers, but also all employees who have established relations with a supplier.



WHAT SHOULD I DO?

- Behave honestly in dealings with suppliers so as to forge a bond of trust, whether the relationship is one-off or long-term;
- Involve a buyer who is positioned sufficiently upstream in order to guarantee the entire purchasing process and manage risks, particularly at the legal, financial and operational level;
- Leave it to the buyer to inform the companies (bidders) that have not been selected as a result of the call for tender and to provide objective criteria justifying this decision;
- Compare the offers submitted by the suppliers interviewed, on all of the bidding criteria, by factoring in the overall cost;
- Respect a sufficient turnaround time in the event of a change of supplier, in order to give that supplier a viable and acceptable withdrawal period.



WHAT SHOULDN'T I DO?

- During informal or formal exchanges with suppliers, disclose and, in particular, provide information on Crédit Agricole Assurance's strategy or any other sensitive data that would not be publicly available;
- Validate the receipt of services, without bothering about the further processing and payment of the supplier's invoices, and notably respecting the payment deadlines required by law and regulations;
- Fail to analyse or take into account all the criteria that could lead to the economic dependence of the supplier upon his selection, and throughout the bank's relationship with him;
- Terminate a contract without giving sufficient notice enabling the supplier to reorganize its business.



EXAMPLES

I want to launch a call for tenders and have five days to choose a supplier: is this possible?

Suppliers need a minimum time to respond. Bidders are notably assessed in accordance with the amount and the nature of the service in question.

If in doubt, contact the Procurement department.

I want to work with a supplier with whom I am entirely satisfied. In fact, I have actually been working with this supplier for 10 years now

and almost all of its sales are generated with the Crédit Agricole Assurances Group. Is there a risk?

The buyer (delegated or otherwise) will obtain information about the supplier, concerning its economic dependence (this economic dependence between the supplier and CAA must not be greater than 25%), and will propose alternative solutions. Should the service come to an abrupt halt, the risk incurred could be financial, operational and/or legal, including respecting the notice period required for contractual termination.

5. | Competition



DEFINITION

Competition law consists of a set of rules applicable to both private and public enterprises operating in different markets. Its purpose is to maintain the principle of free and fair competition and to ensure consumer protection.



DETAILS

Many types of behaviour, such as cartels and abuse of dominance, can jeopardise free competition.

A cartel is an agreement, concerted behaviour or a planned and intentional collaboration between companies whose purpose or effect, even potentially, is to coordinate their behaviour in order to limit competition. An agreement with a company, be it a competitor or not, may take the form of an oral, written, formal or informal agreement (made during a business lunch, or at a meeting within a professional body, etc.).

In addition to the most serious forms of cartel agreements (such as the joint fixing of sales prices or commercial conditions), the distribution of customers or markets, coordination of tenders or a decision to boycott a particular customer or supplier, also constitute a cartel.

Abuse of a dominant position concerns companies in a position to act unilaterally in a given market: pricing policies aimed at eliminating competitors or commercial foreclosure strategies and discriminatory practices, etc.



CAA's COMMITMENT

All Crédit Agricole Assurances activities must be carried out in compliance with competition law, the basic principle being that companies operating in a market must determine their strategy in an autonomous manner. Agreements between independent companies and abuses of dominant position are therefore strictly prohibited.

Sensitive information is non-public data that is strategically useful (information on prices and

trends, list of customers, market capacity and distribution methods, strategy and costs, etc.). It is nevertheless possible to exchange certain information with competitors of Crédit Agricole Assurance as soon as it is made public and whenever it relates to a topic of general interest for the profession or is within the framework of professional bodies. This information must then be aggregated and not be able to be separated out (on the basis of statistics).



WHAT SHOULD I DO?

- Avoid addressing sensitive issues when interacting with third parties outside the Group, regardless of the context;
- If such topics are brought up, put an end to the conversation and immediately notify your manager and the Legal department;
- If in doubt about the degree of sensitivity of the information, check with your Legal manager before undertaking discussions with a competitor or trade association;
- In the context of formal and necessary relations with competitors, clearly indicate the purpose of the exchange, limit the discussion strictly to its purpose and keep a written record;
- Contact the Legal department before entering into any agreement likely to have a significant competitive effect on the market concerned.



WHAT SHOULDN'T I DO?

- Consult with competitors or exchange information with them concerning pricing or product price setting;
- Conclude any customer, territory or market sharing agreements with competitors;
- Boycott any customers or suppliers without a verifiable and objective reason;
- Negotiate clauses such as those limiting the commercial freedom of trading partners without seeking advice from the Legal department.



EXAMPLES

I am to attend a meeting or represent Crédit Agricole Assurance in discussions within the framework of a professional body. Which topics do I have the right to discuss and what provisions should I take?

You can discuss various topics and coordinate certain actions with competitors, provided that these do not relate to subjects deemed sensitive.

Remember that attending (even passively) a meeting where the topic could be qualified as anti-competitive may be considered as membership of a cartel. Before attending any such meetings, make sure there is an agenda.

In the event of non-compliance with competition rules, leave the meeting and request that your departure be noted in the minutes. Do not hesitate to seek help from the Legal department to find out what attitude should be adopted before, during and after such meetings.

I am representing Crédit Agricole Assurances within the context of its participation in an insurance pool. What precautions should I take?

Recourse to the banking pool must be justified by the nature of the transaction and the objective reasons, notably in terms of risk sharing. Coordination between operators must be strictly limited to the risk-hedging operation for which the pool was set up.



Social, environmental and societal issues

6. | Protection of employees' data



DEFINITION

Everyone has the right to have their privacy respected. Personal data may only be collected, processed and stored for specific, proportionate and legitimate purposes and complies with the regulations. This information must be brought to the attention of all employees.



DETAILS

The use of data is strictly controlled:

- Only data that is relevant and strictly necessary with regard to the intended purposes, which must have been clearly defined in advance, should be processed;
- Personal data must not be kept for an unlimited period of time;
- The necessary measures must be taken to guarantee data confidentiality, security measures and contractual framework and to avoid any communication to unauthorized third parties;
- Everyone must be informed about the processing of any of their personal data and its purpose. Among other rights, they also have a right to access and modify their information, and may oppose the processing thereof for legitimate reasons. Their consent must be obtained in the event that this is expressly required;
- The destruction, loss, alteration, disclosure or unauthorised access to personal data may infringe upon the rights of individuals, as well as the individual and collective liberties of employees. Internal rules and procedures must therefore be respected.



CAA's COMMITMENT

In a context where people are being increasingly required to communicate their personal data in paperless form, the Crédit Agricole Group has drawn up a code based on five principles: integrity and reliability, ethics, transparency and education, security and customer control over the use of their personal data.

As an employer, Crédit Agricole Assurances adheres to the same process and guarantees its employees the protection of their personal data and respect for their privacy.



WHAT SHOULD I DO?

- Ensure the appropriateness, proportionality and legitimate nature of the personal data collected;
- Ensure that each processing involving personal data is entered in the personal data processing register, in accordance with internal procedures;
- Inform our employees on how the personal data they have given us is used;
- Guarantee employees' right to privacy notably by not transmitting their information to unauthorised persons and ensuring their personal data are kept securely;
- Request that all inaccurate or incomplete data be completed or removed;
- In the event of subcontracting, ensure that services providers respect these same principles;
- If in doubt, contact the Data Protection Department.



WHAT SHOULDN'T I DO?

- Collect personal information that does not match a specific, necessary and proportionate use;
- Communicate people's personal data to any unauthorized third parties, whether internal or external, without their express consent;
- Conserve personal data without any authorisation.



EXAMPLE

As part of my duties, I have access to the personal data of all employees in my area of management. I didn't have enough time to finish my file tonight and copied the information onto my USB key so that I could make some headway on my way home. Unfortunately, on the train, someone stole my laptop with my USB key in it. Should I notify someone?

You must report this theft to your manager as well as to the Crédit Agricole Assurance Security Officer who will inform the Data Protection Department. Not only is there business information on your computer, but you also have copied

personal data. The loss of this USB key could have serious consequences and cause significant damage, both on the Company and the employees.

In all circumstances, you are bound by a confidentiality obligation which guarantees respect for the privacy of employees, and you must not expose their data to any risk whatsoever of being used, damaged or diverted.

Never copy any personal data whether onto your computer or external devices, particularly when these data are not encrypted. To ensure the security of personal data, it is essential to respect the internal rules and procedures.

7. | Health and safety at work



DEFINITION

Companies must take the necessary steps to ensure the safety and protect the physical and mental health of their employees. These measures notably include implementing a strategy to prevent occupational risks as well as carrying out information campaigns and training sessions.



CAA's COMMITMENT

Everyone working for, or with, Crédit Agricole Assurances must be able to achieve their full potential in a safe, collaborative and secure environment. Crédit Agricole Assurances undertakes to take all necessary measures to ensure the safety and protect the physical and mental health of its employees.

However, safety in the workplace also depends on all of us. All Company employees must take care, in accordance with the training they have received and to the best of their ability, of their own safety and health, as well as that of others.



WHAT SHOULD I DO?

- Become acquainted with the Rules of Procedure and respect the health and safety rules of Crédit Agricole Assurances;
- Make sure that your actions and conduct present no risks to you or for other people;
- Contribute to safety and security in the workplace. This notably involves participating in safety drills and training programmes when offered by the Company and reporting any situation that could constitute a risk to security and safety in the workplace to the Human Resources Department.



WHAT SHOULDN'T I DO?

- Ignore Crédit Agricole Assurances' rules on health and safety at work;
- Ignore any situation that could compromise the safety and security of our working environment.

EXAMPLES

I have noticed a change in behaviour of a colleague of mine: he seems very stressed, isolates himself, has lunched alone for some time and refuses to discuss anything. It worries me but I don't know what I can do.

This situation troubles you. It is important you share this information with your manager or Human Resources department, so that they can intervene rapidly, in the interest, and for the good of the person concerned.

During the last fire drill, I realized that the two people responsible for evacuating my unit were both absent; one colleague didn't know what to do. Should I notify someone?

During the drill, you noticed a glitch in the drill procedure that could have compromised the safety of a colleague. You must inform the security officer in writing, so that she or he can rectify the situation and take the necessary measures to ensure the security of all persons on the site.

8. | Non-discrimination



DEFINITION

Discrimination is a form of unequal treatment that is based on a prohibited criterion and falls within the area covered by legislation. In specific terms, discrimination is the act of distinguishing someone on the basis of a set of criteria or distinctive characters.



DETAILS

The law on discrimination currently in force defines twenty-four discrimination criteria:

- origin;
- gender;
- family situation;
- pregnancy;
- physical appearance;
- the particular vulnerability of a person resulting from their socio-economic situation which is clear or known to its author;
- surname;
- address;
- bank information;
- state of health;
- loss of autonomy;
- disability;
- genetic characteristics;
- morals;
- sexual orientation;
- gender identity;
- age;
- political opinion;
- trade union or cooperative activities;
- the ability to express oneself in a language other than French;
- actual or alleged membership or non-membership of an ethnic group, a nation or an alleged race;
- religious convictions.

According to law, discrimination may be direct: “the situation in which (...) a person is treated less favourably than another is, has been or would have been treated in a comparable situation”.

These are situations that are publicised or even asserted. For example, it could be a job advertisement specifying “women with dependants”.

Or

indirect: when an apparently neutral provision, criterion or practice causes a particular disadvantage for some people with regard to others, unless this disposition, criterion or practice is objectively justified by a legitimate end and the means for achieving this purpose are necessary and appropriate.



CAA's COMMITMENT

Crédit Agricole Assurances is committed to raising the awareness of its executives, managers and employees about issues of non-discrimination. Promoting gender equality and diversity enables employees to feel they are treated fairly from the moment they are taken on, and throughout their professional career in the Company. A working environment in which everyone feels respected, regardless of their unique character, enhances commitment and performance.



WHAT SHOULD I DO?

- Reject all forms of discrimination against employees, customers, suppliers, services providers and other persons having relations with Crédit Agricole Assurances;
- Provide support and assistance, in situations that you may be witness to that would, or could, be discriminatory towards employees, supplier or customers, etc. Depending on the situation, alert your HR contact or managers as appropriate;
- If you are a manager, be careful to base your decisions on objective criteria that exclude any prejudices.



WHAT SHOULDN'T I DO?

- Treat people differently on the basis of discriminatory criteria that places them at a disadvantage compared with others;
- Contribute to creating a hostile climate that is conducive to discrimination.



EXAMPLES

An employee tells me that they want to take a day off to celebrate a religious holiday that does not fall on a public holiday. May I refuse?

Requests for leave must be approved by the manager, while leaving room for consultation within the team so as to take into account as much as possible the personal constraints of everybody involved (such as those related to religious holidays). Leave dates must be determined by taking into account the proper functioning of the department in question. If necessary, you must be able to justify your refusal to accept a request for leave objectively.

During a job interview, a candidate incidentally mentions the fact that she is a single parent raising

two young children. Am I allowed to ask her whether she can organize things so that she can go on an assignment or work overtime?

Questions asked during job interviews must be limited to the job in question. It is therefore not permitted to question candidates about their family situation, or use the fact that candidates mention their personal situation themselves to try to find out more. Only when a job involves proven constraints such as assignments or frequent trips is it possible to discuss this subject and question candidates about their ability to organize themselves accordingly; but this must be done without asking any personal questions about how to do this.

9. Diversity and gender equality



DEFINITION

Companies must comply with obligations regarding gender equality and the employment of people with disabilities.



DETAILS

Companies with 50 employees or more must conclude an agreement on gender equality at work or, failing this, draw up an action plan. This agreement is based on an assessment of the inequalities that exist between women and men in the workplace and, in particular, serves as the basis for preparing an action plan to reduce the discrepancies identified, and to monitor and promote equality in the workplace.

Companies with 20 or more employees are required to employ disabled people in the proportion of 6% of the total workforce of the enterprise on a full-time or part-time basis. If they do not fulfil this obligation, they must pay a contribution to the Agefiph French Agency, the fund for the integration of disabled people in the workplace.



CAA's COMMITMENT

In addition to its legal obligations, Crédit Agricole Assurances considers that diversity is a factor that enhances performance and attractiveness.

Promoting gender diversity is about creating an open and responsible corporate culture that fosters internal cohesion and progress.

Teams with diverse profiles and talents reflect the Company and enable us to invent new models, better meet the expectations of our customers and as such benefit everyone.

This commitment results in concrete actions such as:

- promoting women to positions with managerial responsibility and within the management committees;
- integrating people with disabilities.



WHAT SHOULD I DO?

- Be attentive to making an objective judgement focused on skills in all managerial decisions;
- Ensure that your teams are made up of a balanced proportion of equally-skilled women and men.



WHAT SHOULDN'T I DO?

- Make a decision on the basis of non-objective criteria;
- Implement processes that could lead to unequal gender treatment or even discrimination, even though the purpose of these processes was initially intended to resolve inequalities.

EXAMPLES

Most of the people in my team are men. One of my staff will be retiring in a few weeks and I'm thinking about replacing him with someone in the team. Should I focus on promoting a woman?

Above all, base your judgement on the skills of everybody in your team and choose the person best suited to fulfil the duties of the job.

I have received several applications for a vacant position on my team. After carrying out several interviews, the person whose skills are most in

line with the job requirements is disabled. How will my team react?

It is essential to remember that a person's skills are the only factor to be taken into account when recruiting. As a manager, if you have any concerns about the successful integration of this new employee into your team, do not hesitate to ask your Human Resources contacts. If necessary, actions can be implemented, with the support of the Disability Integration Manager of your entity, to ensure that the employee's integration into the team is carried out in the best possible way.

10. | The fight against harassment



DEFINITION

The law punishes the harassment of others through repeated comments or behaviour, the purpose or effect of which is to cause a deterioration in working conditions, and which may infringe upon their rights and dignity, impair their physical or mental health, or compromise their professional future.



DETAILS

Moral harassment can take several forms:

- derogatory remarks;
- humiliation or bullying;
- Insults.

Sexual harassment is the act of repeatedly making sexual comments towards or imposing behaviour of sexual nature on a person that undermine their dignity because of their degrading or humiliating nature or create an intimidating, hostile or offensive environment.

Sexual harassment also covers the use, be it recurring or not, of any form of serious coercion for the purposes of obtaining an act of a sexual nature, whether it is sought for the benefit of the perpetrator or for the benefit of a third party. Companies with 250 or more employees must nominate a contact person for this subject to carry out awareness and training initiatives, implement internal sexual harassment alert and management procedures.



CAA's COMMITMENT

Crédit Agricole Assurances is committed to ensuring the prevention and detection of such practices and situations, which constitute criminal offences that are heavily sanctioned, in order to put an end to them.

Crédit Agricole Assurances entities deploy staff awareness-raising, training, monitoring and listening mechanisms so that they can take preventive measures and provide customised support adapted to the specific requirements of each situation.

No employee, trainee or intern can be sanctioned, dismissed or discriminated against for having suffered or refused to accept sexual harassment or acts of moral harassment or for testifying on such acts or disclosing them.



WHAT SHOULD I DO?

- Become acquainted with the Company's internal prevention and action policies and procedures;
- Participate in internal awareness-raising campaigns and training programmes;
- Be attentive to everyone around you, contact the Human Resources department if you become aware of a case of harassment.



WHAT SHOULDN'T I DO?

- Ignore a situation of harassment that you know about, whether you are the victim or a witness, irrespective of the reason or the alleged ramifications.



EXAMPLES

A colleague of mine is being repeatedly subject, in a humiliating way, to criticism of their work by their manager and being reproached in front of the rest of the team. His/her work is automatically being called into question and he/she is being reprimanded without any verification of the performance of their tasks. He/she is taking more and more time off for sick leave.

Quickly report this situation to your Human Resources contact; you may request that this first discussion remain confidential. If you feel confident enough, alert your manager to the need to preserve fair and respectful working relations. If the situation persists, get back in

touch with your Human Resources contact who will implement suitable measures to quickly put an end to your colleague's harassment.

A colleague is particularly intimidating and humiliating. He/she frequently makes sexual innuendos towards me and makes inappropriate gestures. Despite my insistence that they stop this behaviour, he/she keeps pestering me for a date.

Report this unacceptable behaviour quickly to your manager or Human Resources contact in order to alert them to this unacceptable behaviour. You can also seek the support of an employee representative to accompany and support you so that this situation stops as soon as possible.

11. | Extra-professional activities



DEFINITION

An extra-professional activity is an activity that you undertake outside your working hours. The concept of pluriactivity can be defined as the simultaneous exercise by the same person of two or more activities of a professional, trade union or political nature.



DETAILS

Having a salaried job does not prevent you from having an independent or self-employed activity at the same time. Accumulation of activities is possible since salaried jobs are the only activity that is subject to working time regulations. It follows, for example, that, employees can exercise an activity in a social form (non-profit association).

However, while the principle is the freedom to work, employees must respect a professional code of ethics with respect to their employers. Indeed, for the duration of their employment contract, employees are bound by an obligation of loyalty to their employer. In general, this obligation involves taking care not to tarnish the reputation or prevent the proper functioning of the Company, notably by committing acts of disparagement or undertaking competitive practices that would be against the interest of the company.



WHAT SHOULD I DO?

- Inform your manager beforehand if you're contemplating exercising a remunerated activity outside your working hours (except for the production of scientific, literary or artistic works);
- Be transparent with your manager, and declare the status of your situation to the Compliance Manager;
- Respect the obligation of confidentiality, professional secrecy and trade secrets;
- Be well acquainted with the terms of your employment contract in order to apply the clauses that you are required to respect. If necessary, ask the Human Resources department to explain it to you.



WHAT SHOULDN'T I DO?

- Exercise an activity that competes with that of the Company during the term of your employment contract (including using a period of leave to perform a remunerated activity or conduct a training course for a rival company);
- Perform an extra-professional activity in addition to your professional activity, that could prevent you from achieving the objectives defined in the context of your salaried activity, or generate conflicts of interest;
- Exercise your extra-professional activity during the working hours defined in your contract;
- Use the equipment and resources put at your disposal within the context of your work for your extra-professional activities.

EXAMPLE

I am a volunteer in a local association whose values seem very close to those of Crédit Agricole. Can I use the office photocopying machine to print the association's advertising materials?

No. You cannot use Company materials or any other corporate resources for the purposes of any extra-professional activity.

12. Environmental strategy



DEFINITION

The European Commission defines Corporate Social Responsibility (CSR) as the responsibility of companies with regard to the effects they have on society and, more specifically, how companies integrate social and environmental concerns in their business operations and in their interaction with their stakeholders on a voluntary basis.



DETAILS

Businesses must contribute to sustainable development, including the health and well-being of society. For this, they must commit to:

- taking into account stakeholders' expectations;
- fully meeting legal obligations or even going beyond them;
- investing more in human capital and the environment;
- integrating this responsibility across the organisation and implementing it in all internal and external relations.



CAA's COMMITMENT

Crédit Agricole Assurances demonstrates its environmental approach in all its businesses and in its corporate operations with several goals:

Reducing its direct environmental footprint:

- by creating momentum around environmental topics in the way it operates and for its employees;
- by continuously improving the eco-efficiency of its buildings;
- by preserving resources;
- by reducing its energy consumption and its direct carbon footprint;
- by reducing the amount of waste produced by its sites and optimizing waste recycling;
- by incorporating environmental requirements into its supplier-selection criteria.

Supporting customers to help them meet their environmental challenges:

- by offering them products and services with environmental dimension;
- by taking into account and managing the risks related to the environmental impacts of its businesses. This involves taking environmental risk into account when making financing decisions and responsible investments.

Developing Green Finance

- by stepping up the financing of renewable energies;
- by increasing investment in energy transition projects and initiatives;
- by contributing to the development of socially responsible investment (SRI) through dedicated funds.



WHAT SHOULD I DO?

- Acknowledge the active protection of the environment as the essence of Crédit Agricole Group's identity, and present it as such in your daily internal and external professional activities;
- Be aware of the daily impact of your behaviour on the environment;
- Take personal responsibility and take into consideration the direct and indirect environmental impacts generated by your professional activity;
- Commit yourself to contributing to the Group's environmental objectives and actions, particularly in discussions with customers and stakeholders and when speaking outside of the Company.



WHAT SHOULDN'T I DO?

- Ignore the environmental objectives and commitments made by the Group;
- Convey messages that conflict with the Crédit Agricole Group's environmental strategy.



EXAMPLES

A colleague tells me that to the extent that we comply with environmental legislation, it is pointless implementing any new initiatives in this area.

You can reply that the Group's commitment to the environment goes beyond compliance with the law and regulations: our environmental and CSR policies are factors that underpin performance and a strong element of identity. Beyond the positive impacts generated for stakeholders, the reduction in raw material consumption significantly reduces our costs. Taking environmental risks into account upstream helps to reduce our risks. In addition, financing the energy transition is a source for the development of future activities.

I don't understand what the environment has to do with us. We aren't an industrial company with factories.

As a major player in the insurance banking sector, our leading position means we have a duty to set an example. Our investment and financing decisions can guide industrial projects towards less polluting or even virtuous techniques. The way we operate (such as the construction and running of our office buildings, employee transport, the impacts caused by operating our IT equipment and waste sorting) can be further improved to reduce our environmental footprint. Our environmental policy is fully integrated into all our activities and businesses. It serves as a source of innovation for our customers.

13. Contribution to the regions



DEFINITION

Since Crédit Agricole is more than ever committed to promoting its cooperative and mutual company values, it contributes every day to the development of the regions by providing strong support in their economic and social initiatives.

The goal of the Crédit Agricole Group is to have a positive regional footprint: supporting local entrepreneurship, allocating savings to activities that have positive impacts on the region, participating in the life and social development of the regions.



CAA's COMMITMENT

Every year, using various media, notably via companies, Crédit Agricole Assurances invests and contributes in a significant way to financing the economy.

By deploying a risk prevention strategy in the regions, Crédit Agricole Assurances avoids or minimises the risk of damage and makes everyone responsible for adopting an active prevention approach.

By offering insurance solutions that are tailored to cover the risks related to the activities of professionals and companies, as well as to personal projects, Crédit Agricole Assurances, with its different distribution networks in France and abroad, assists the development of the regions by supporting and protecting the financing of the economy.

In addition, Crédit Agricole Assurances is stepping up its support to vulnerable populations in all regions, thanks to its various solidarity schemes.



WHAT SHOULD I DO?

■ Understand that regional support is an integral part of the Group's culture. Close customer relationships, responsibility and solidarity are the values that should encourage you to contribute to actions designed to improve regional development conditions.



WHAT SHOULDN'T I DO?

■ Involve Crédit Agricole Assurances in actions that do not respect the Group's regional commitments.

EXAMPLE

I'm not sure why Crédit Agricole Assurances is involved in making a contribution to the regions: I would have thought that was the role of the Regional Banks and LCL?

Crédit Agricole Assurances itself contributes to the economic development of the regions, for example:

■ by investing every year via companies located in the regions;

■ by deploying an active risk prevention strategy across the regions;

■ by offering, via the Group's regional partner banks, insurance solutions tailored to cover the risks associated with the activities of individuals, farmers, professionals and businesses.

In addition, Crédit Agricole Assurances is stepping up its support to vulnerable populations in the regions, thanks to its various solidarity and patronage schemes for small and medium-sized, general interest organisations.



Anti-corruption

MESSAGE FROM THE CHIEF EXECUTIVE OFFICER OF THE CREDIT AGRICOLE GROUP S.A.



“

The long-standing values of our Group: “close customer relationships, responsibility and solidarity” mean that people drive our actions and are central to our purpose.

Our values and principles require each person to act in an irreproachable manner. We share the belief that these values and principles drive strength and growth.

It was with this in mind that the Anti-Corruption Code of Conduct was drawn up in order to bring together the guidelines for good conduct in terms of the fight against corruption and influence peddling, and to underscore our zero tolerance policy with regard to any infringement of the rules in this Code. As such, the Group has obtained ISO 37001 certification for its anti-corruption management system.

This Code summarizes the situations we may face and provides the necessary information to assist us in making decisions that are in accordance with the laws and regulations in force, notably the “Sapin II” law, and that are also in line with the values and the principles of the Group. This Code should be read in conjunction with the Group’s Ethical Charter.

It concerns all of us, irrespective of our position in the organization, our duties or the country where we work, and serves as a reference for our partners (suppliers, customers, etc.).

Everybody plays a role in the development of the Group and must respect the Anti-Corruption Code of Conduct. We are counting on you.”

Philippe Brassac



FURTHER INFORMATION REGARDING THE APPLICATION OF THE ANTI-CORRUPTION SECTION OF THE CODE OF CONDUCT

The general rules regarding how to use the Code of Conduct apply to the anti-corruption section and, in particular, the “whistleblowing”.

To whom does the anti-corruption code of conduct apply?

The Anti-corruption Code of Conduct applies to everyone, be they directors, managers or employees (permanent, fixed-term, apprentices, work-study trainees and interns), regardless of their position and function within the Crédit Agricole

Assurances Group, as well as external and temporary employees of the Crédit Agricole Assurances Group (hereinafter “the Employees”). This Code is applicable across the Group and its subsidiaries around the world.

What are employees’ obligations?

The Anti-Corruption Code of Conduct is incorporated into the Rules of Procedure and its application is mandatory. Everyone must be acquainted with, and act in accordance with the principles and rules of the Code, in performing their duties.

We are all responsible for our actions and therefore have a duty of constant vigilance.



Anyone who notices or suspects an act or behaviour that is unethical in terms of the Group's values or of regulations, or who is put under pressure to commit an act that is unethical, in terms of the Group's values or illegal, must immediately inform their manager. The Group's whistleblowing procedure enables everybody to report an anomaly to the Compliance Manager or, in certain cases, to the Supervisory Authorities.

What are the consequences of infringing the Code?

The rules of conduct set out in this Anti-Corruption Code are related to Crédit Agricole Assurances' Internal Regulations. In accordance with these latter, sanctions may be imposed on anyone who infringes these principles and legal obligations.

Remember

For employees, all acts of corruption are subject to disciplinary sanctions, as set out in the Internal Regulations, and also to administrative, civil and criminal penalties of up to ten years' imprisonment and €1,000,000 in fines in the case of public corruption.

As a legal entity, Crédit Agricole Assurances can incur fines, as well as withdrawals of approval, and be prohibited from raising funds which, in addition, would damage its reputation.

For more information, all of the procedures implemented by the Group to fight against corruption are available in your Intranet space.

14. | Fight against corruption



DEFINITION

Corruption is the act of an individual in a specific public or private office who solicits, proposes or accepts a gift, an offer or a promise for the purposes of performing, delaying or omitting to perform an act which is, directly or indirectly, within the sphere of their duties.



DETAILS

In French law, the offences of active bribery (committed by an individual who gives a bribe) and passive bribery (committed by an individual who accepts a bribe) are punishable by up to ten years' imprisonment (public bribery).

Active bribery is the deliberate act of making, either directly or indirectly, offers, promises, donations, gifts or any other advantage to public officials or private persons in order that they perform or refrain from performing an act within the scope of their duties.

Passive bribery concerns public officials or private persons who solicit or authorize, directly or indirectly, promises, donations, gifts, or any advantages for themselves or for others, in order to perform or refrain from performing an act within the scope of their duties.



CAA's COMMITMENT

We employ a zero tolerance policy with regard to corruption including facilitation payments (see specific card on "Fight against facilitation payments"). No employee may engage in bribery in any form and for any reason whatsoever.

Corruption impedes free competition and impairs economic development; it can have very serious financial, commercial and criminal consequences, which could seriously damage the reputation and image of the Group. Any employee involved in an act of corruption is also liable to disciplinary or even criminal sanctions.



WHAT SHOULD I DO?

- If you receive any pressure or requests from third parties, notify your manager and the Compliance Department;
- Declare to Compliance all gifts and benefits whatever their value that are offered or received, or sent directly to your home;
- Respect the existing approval procedures for expenses incurred by staff members;
- Be constantly on the alert and monitor all of your relationships with intermediaries and suppliers;
- Respect the recruitment procedures defined by the Group;
- Ensure that all payments are substantiated, documented and properly authorized.



WHAT SHOULDN'T I DO?

- Offer, promise or agree to giving a benefit (financial or otherwise) to a third party, for the purposes of inducing them to improperly perform or refrain from performing an act;
- Solicit, receive or accept any benefits (financial or otherwise) in exchange for performing a task, give consent under a commercial agreement or carry out any other action in the course of my duties or activities;
- Favour a third party in calls for tenders;
- Offer or accept gifts and benefits other than those that have been authorised;
- Accept an offer by a third party to finance a trip for you, either partially or in full, even if it is for business reasons.



EXAMPLES

One of my suppliers has offered me a weekend by the sea. In exchange, all I need to do is reduce his due payment date by a few weeks.

Can I do this?

It is forbidden to take advantage of your position or duties to receive any gifts or benefits. Immediately alert your manager, and the Compliance departments, to the fact that someone has tried to bribe you.

A supplier with whom I have very good relations has invited me to a trade show on the other side

of the world and offered to pay part of my trip. What should I do?

Politely decline the offer. To preserve the independence of the Group and its employees, it is not possible to allow a third party to pay for all or part of a trip, even a business one. Inform you manager and Compliance immediately.

My manager requested that I ask one of our usual outside contractors to hire a member of the manager's family. What should I do?

Politely decline the request and refer the matter to their direct manager.

15. | Fight against influence peddling and interaction with public officials



DEFINITION

Influence peddling is the act of persons in a position of public authority or entrusted with a public services mission, or elected officials, who solicit or illegally accept offers, promises, donations, presents or benefits of any kind for themselves or for others, with the aim of using their real or supposed influence to obtain awards, jobs, markets or any other positive decision from a public authority or public administration.



DETAILS

Influence peddling is the act of monetizing a person's position or real or supposed influence in order to influence a decision to be made by a third party.

This involves three parties: the beneficiary (who provides the benefits or makes the donations), the intermediary (who uses the credit they have because of their position) and the target person, who holds the decision-making power (public authority or administration, magistrate, expert, etc.).

Criminal law distinguishes between active influence peddling, concerning the beneficiary, and passive influence peddling, concerning the intermediary. Each of the two offences is treated separately and punished in the same way, carrying a prison sentence of up to ten years.



CAA's COMMITMENT

All employees must adopt business behaviour that is in accordance with French anti-corruption regulations and which is applicable in the countries where we operate.

Offering gifts, benefits or public relations activities to public officials is strictly prohibited. Certain activities involving public officials require particular vigilance.



WHAT SHOULD I DO?

- If pressured or solicited by a public official, alert your manager and the Compliance Department;
- Comply with the procedures for activities involving public officials;
- Be constantly on the alert and regularly monitor all transactions involving public officials;
- Ensure that all payments and expenses involving public officials are properly authorized, accounted for and documented.



WHAT SHOULDN'T I DO?

- Offer, promise or consent to giving a benefit (financial or otherwise) to a public official, for the purposes of inducing them to improperly perform or refrain from performing an act;
- Favour a relative of a public official within the context of a call for tenders or recruitment process;
- Give cash to public officials.



EXAMPLES

To open a subsidiary in a foreign country, we have to obtain a banking licence. An employee of a government department in this country offered to exert influence on the person in charge of granting licences and asked me to pay part of the amount required into a bank account. What should I do?

Refuse and notify your manager as soon as possible and seek advice from the Compliance Manager to avoid becoming involved in a corrupt procedure.

I am in charge of a sales department within the Group. A municipality seeking funding is seeking information about the local banks, including our Group. One of my acquaintances who is the deputy mayor of the municipality, is offering to use his influence to discretely obtain a copy of the competing offers from the mayor. In exchange, they want an expensive gift.

Refuse the request, which constitutes an active act of influence peddling. Discuss it with your manager.

16. | Fight against facilitation payments



DEFINITION

Facilitation payments are generally small sums of money that are paid directly or indirectly to public officials in order to carry out or speed up formal administrative procedures. These payments are notably made within the context of processing visa applications, issuing authorisations, permits and licences and for customs procedures.



DETAILS

Facilitation payments are considered corrupt acts. These are prohibited by the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions of 17 December 1997 and the Sapin II law of 9 December 2016.



CAA's COMMITMENT

Facilitation payments are strictly forbidden. Only in exceptional cases, particularly where the security or physical safety of an employee is threatened, can exceptions be made. In such situations, the Compliance Manager should be notified as soon as possible. In addition, facilitation payments must be duly identified and recorded in the accounting books and documents of the Company.



WHAT SHOULD I DO?

- Consult your manager or the Compliance Manager if you receive a request for a facilitation payment from a public official;
- Alert your manager or the Compliance Manager if, in the context of an exceptional situation, you have made a transaction that may be considered a facilitation payment;
- Keep all documents relating to any transaction that could be considered a facilitation payment.



WHAT SHOULDN'T I DO?

- Offer, promise or give a benefit (financial or otherwise) to a public official within the context of performing a routine administrative task;
- Mediate on your own when dealing with a facilitation payment request.

EXAMPLES

To obtain a permit within the context of a real estate construction programme, an official offers to speed up the authorisation process, which usually takes several months, in exchange for a gratuity. Should I pay?

No, because this sum is not a legitimate expense. Inform your manager or your Compliance Manager because facilitation payments can be considered as corrupt acts.

I have to go on a business trip to a country for which I need a visa. At the embassy, an agent informs me that the time to obtain the visa is longer than I had foreseen. They are offering to speed up the process for me if I offer them some seats for a show. What should I do?

To avoid any act of corruption, politely decline the offer and immediately inform your manager or the Compliance Manager.

17. | Conflicts of interest



DEFINITION

A conflict of interests is a situation where the personal interests of an employee may conflict with those of Crédit Agricole Assurances or its customers.

In other words, when the personal interests of employees or members of management bodies, may influence their discretion or decision-making capacity when carrying out their professional duties.

Conflicts of interest can be of a personal nature (such as family ties), professional (such as commercial relations), financial (as in personal loans) or political (having an influence on the Company).



CAA's COMMITMENT

Crédit Agricole Assurances has implemented an active conflicts of interest prevention policy. Conflicts of interests may include acts of bribery or influence peddling and expose the Company and its employees to allegations of bias or dishonesty. They may also have repercussions on the reputation of the Group and its employees.



WHAT SHOULD I DO?

- Respect the Group's prevention principles and measures notably regarding gifts and benefits, public relations activities and extra-professional activities, to ensure I maintain my independence of judgement and avoid situations of conflicts of interest;
- Declare all my elected public offices to my manager, who will inform Compliance;
- Declare all of my elected public offices, corporate offices and director positions in companies (financial or not) to my manager, who will inform Compliance;
- Inform my manager of any personal or family ties I may have with a third party in relation to my Company;
- Inform my Compliance Manager of any potential direct or indirect conflict of interests and abstain to participate in debates or decision-making on the subjects concerned.



WHAT SHOULDN'T I DO?

- Make decisions if your discretion or decisions could be influenced or altered by personal considerations or by pressures imposed by a third party;
- Conceal information about any conflict of interests or situations that could create such a situation;
- Acquire positions of interest in a competitor, customer or supplier.

EXAMPLES

My manager asked my opinion on selecting a new supplier because he's hesitating between two companies. It turns out that the manager of one of the companies is a childhood friend of mine. How should I react?

To avoid any conflict of interests, inform your manager in writing about this relationship and withdraw from the selection process.

My brother is a services provider in a training organisation, and the solutions he's offering are competitive and adapted to our needs. Should I say no?

Report this situation in writing to your manager who will take all measures to avoid a possible conflict of interests, in particular do not participate in the provider-selection process.

I am an employee of Crédit Agricole Assurances and a member of the Board of a company in which Crédit Agricole Assurance is a shareholder. What should I do?

Report the situation to your manager who will inform Compliance and do not participate in any discussions and decisions on subjects that could cause a conflict of interests.

18. | Gifts and invitations



DEFINITION

Corporate gifts are those that are offered within the context of business relations. Some may be worth a significant value (trips, electronic equipment, etc.) and are therefore monitored to avoid any risk of corruption.

Invitations include any form of social contact and invitation either offered or received. In a commercial context, these public relations interactions take the form of meals, hotel accommodation, seminars, conventions or conferences, or invitations to sports, cultural and social events, as well as business and press trips.



CAA's COMMITMENT

Employees must not accept gifts or invitations, directly or indirectly, which may, even unintentionally, compromise their independence, impartiality or integrity. They must refuse all gifts or invitations that could place them in a conflict of interests. In the same way, it is forbidden to solicit gifts from individuals or companies which either have, or are trying to develop, business relations with the Group.

The maximum value of gifts and benefits, either given or received, is set at €200 (from the same entity, in total and over a one-year period). Before accepting gifts or benefits the value of which exceeds the authorized amount, employees must file a request with their manager, who must then notify the Compliance Manager.

Crédit Agricole Assurances does not forbid employees from offering or accepting participation in public relations events. These are gestures of courtesy and are welcome between business partners. However, these public relations must be clearly justified at the business level. For all public relations activities, customers must always be accompanied by the employee of the entity that issued the invitation.



WHAT SHOULD I DO?

- If you are a manager, make sure that your staff are aware of the rules regarding gifts and invitations, public relations activities and business trips;
- Before accepting a gift or an invitation, ask yourself how this could be perceived publicly and refuse offers that might create a conflict of interests for you;
- Be transparent with your manager to avoid any suspicion;
- Refuse invitations to high-worth events;
- If you accept an invitation, pay the associated travel and accommodation expenses;
- Comply with the internal declaration procedure;
- Refuse all gifts sent to your home address.



WHAT SHOULDN'T I DO?

- Accept or give any gifts or benefits worth more than the authorised fixed amount or receive any of these at your personal address, regardless of the amount;
- Solicit any form of gift or benefit for your own account or for that of a third party;
- Receive any form of remuneration from a counterparty, an intermediary, a supplier or a customer, either directly or indirectly;
- Give or receive gifts in cash form;
- Offer or accept any public relations gifts or invitations that could damage the Group's image.



EXAMPLES

Can I offer a customer tickets to a show without attending myself?

No, you must attend as a representative of your business activity. The same goes for invitations received from providers.

I received some small gifts sent to my personal address from one of my business contacts. I am not very comfortable with this because my manager does not know: what should I do?

The right thing to do is to tell your manager and seek advice from the Compliance Manager

to find the most appropriate way to handle the situation and avoid becoming involved in any corrupt dealings.

I have just received an invitation to an event whose cost seems high but difficult to assess (Rolland Garros, private-box seats to a show, dinner in a prestigious setting, etc.) What should I do?

In such a situation, before accepting the invitation you must discuss this with your superior who will contact Compliance where there is any doubt or exceedance.

19. Lobbying and financing political parties



DEFINITION

Lobbying or the representation of interests describes any direct or indirect communication with public officials for the purposes of influencing public decisions. Consulting people representing interests enables the legislator to obtain information about how the law is enforced and how to improve it. It also gives public decision makers greater insight into what civil society expects.

The financing of political parties by legal entities (companies, foundations, etc.) is strictly forbidden.



CAA's COMMITMENT

In cooperation with experts and practitioners from the Group's different entities, lobbying enables Crédit Agricole Assurances to make a positive and significant contribution to public debates at the international, European and national levels on policy and technical issues. Its purpose is to provide a reasoned view of the impacts of public decisions for Crédit Agricole Assurances and to preserve and/or promote its interests. The Group has set out its commitments in its Responsible Lobbying Charter.

In addition to fully respecting the ban on financing political parties, including in countries where this practice is permitted, the Group insists that all information pertaining to the convictions and political commitments of its employees remain personal, in order never to implicate or jeopardise the Group's reputation. These activities must be carried out outside working hours and outside the Group.



WHAT SHOULD I DO?

- Be transparent about your lobbying activities, inside and outside the Group;
- Declare the offices you hold in various professional bodies;
- Base your arguments on reliable information that has been analysed and audited at the internal level;
- Highlight the consequences for the different stakeholders;
- Update the list of appointments you make with public decision makers, for the purposes of influencing public decisions, so that you can draft the annual report of your activities, as required by the law;
- Declare your elected public offices to your manager and Compliance Manager;
- Make sure that you do not commit the Group with your political opinions and actions;
- Refuse any solicitation in any form whatsoever that requests your political support and could make the Group liable;



WHAT SHOULDN'T I DO?

- Use corruption and any dishonest or abusive practices;
- Use the resources or funds of the Group to engage it in fund-raising or political support activities;
- Offer or accept any gifts and benefits.

EXAMPLES

What should I do if one of our customers asks me to support his political campaign in the local elections?

Refuse this request for support in order to ensure the political neutrality of the Group and immediately inform your manager or your Compliance Manager.

I work in a country where it is customary for large foreign companies to finance the main political parties. Can Crédit Agricole Assurances make such a contribution?

No. Even if this form of monetary support is accepted by law and local customs, it could make the Group liable. Inform your manager and the Compliance Manager immediately.

20. Patronage and solidarity actions



DEFINITION

Patronage is a gift made by a company or individual to a general interest activity. This commitment, which may be made in cash or in kind or by contributing skills, covers a wide variety of areas: social, culture, education, health, sport, environment, research.



CAA's COMMITMENT

Crédit Agricole Assurances' commitment is made in compliance with the stringent rules governing patronage, particularly those regarding the strict distinction between sponsorship and business activities.

The aim of Crédit Agricole Assurances' societal patronage approach is to lend financial support to general interest organisations that work with caregivers. This patronage programme has an extensive territorial influence and is widely promoted by partner networks. These organisations are located throughout France, notably in rural areas where needs are high and sometimes inadequately covered.

In April, in order to facilitate employee engagement in public interest initiatives, CAA launched the CSolidarity programme which allows everyone to get involved in mentorship, volunteering and skills sponsorship initiatives. Given the health crisis, the scheme was adapted to offer activities that can be performed remotely. The mechanism is a concrete example of CAA's commitment to society and Crédit Agricole Group's desire to play an active role in the area of inclusivity.

Contributions, whatever their nature, should never be used to disguise an illegitimate benefit that is

intended, or appears to be intended, to influence decision-making.



WHAT SHOULD I DO?

- Promote general interest actions of organisations whose accounts are published and regularly audited;
- Select organisations with adequate financial and personnel resources to achieve their objectives;
- Ensure that all patronage agreements drawn up with the organisations concerned incorporate compliance clauses and make sure you are in a position to verify how these funds are used;
- Ensure that all expenses incurred by charitable projects under this patronage framework have been properly authorised, accounted for and documented;
- Ensure that any information concerning the organisations supported by Crédit Agricole Assurances is not disclosed for commercial purposes within and outside the Crédit Agricole Group.



WHAT SHOULDN'T I DO?

- Use any information on the patronage actions conducted by Crédit Agricole Assurances for commercial purposes;
- Make donations to individuals or for-profit organisations;
- Finance works that indirectly benefit, or are controlled by politicians, public officials or their relatives;
- Support organisations that could have a negative impact on the Company's reputation;
- Make cash payments.

EXAMPLES

A Group employee contacted me to obtain financial support from Crédit Agricole Assurances for an association for which he is treasurer. What should I do?

Specify the nature of the Company's patronage and the various programmes for which the employee's project may be registered to obtain possible financing. Suggest they contact the Communications Department, as the CSR entity.

An entity of the Crédit Agricole Group has asked me to provide all the information (contact details, amount of funding granted, etc.) on the associations financed in its region within the framework of a call for projects.

Inform your correspondent that this information is not intended for commercial ends, identify the information that they would need and the use that would be made thereof so that, where applicable, you can send them the information you have jointly discussed.

21. | Sponsorship



DEFINITION

Sponsorship, or sponsoring, is a form of marketing whereby the Company assumes all or part of the expenses of a project or programme, in exchange for obtaining visibility on media platforms or events.



DETAILS

The Company benefits from the fact that its logos and brands are displayed by the project or programme in question, and that it receives a specific mention specifying that it has contributed to the financing. This may involve non-profit organisations and commercial entities.



CAA's COMMITMENT

Sponsorship may be part of the marketing and communication strategy within Crédit Agricole Assurances. Since sponsorship is a component of the Group's image, Crédit Agricole Assurances promotes sponsorships that are particularly related to sports or cultural activities. Sponsorships must comply with Group principles and never be used to advantage unduly, influence improperly or give the appearance of improperly influencing any person responsible for making decisions.



WHAT SHOULD I DO?

- Carefully select the sponsored organisation, in the light of its experience and reputation;
- Prefer sponsored organisations whose accounts are published and regularly audited;
- Submit a written request to the Executive Management. When sponsored events or activities are controlled by politicians, public officials or their relatives, this must be indicated in my request;
- Draw up a contract including compliance clauses with the sponsored organisation;
- Inform all stakeholders of the sponsorship;
- Transfer funds in several instalments, ensure that each payment is used properly and keep the receipts.



WHAT SHOULDN'T I DO?

- Sponsor an organisation suggested by a public official;
- Sponsor an organisation that indirectly benefits, or is controlled by, politicians, public officials or their relatives.

EXAMPLES

As a customer services representative, I was contacted by the treasurer of a group who suggested that Crédit Agricole Assurance sponsors a sports event in exchange for a multi-million Euros contract. How should I react?

Decline the offer since this conduct is corrupt. Inform your manager or Compliance Manager immediately.

I read in a newspaper that a sports club sponsored by Crédit Agricole Assurances participated actively in fixing matches for a national cup. I am afraid that the name of the Group may be associated with this scandal. How should I react?

Discuss it immediately with your manager or Compliance Manager so as to determine what action should be taken. This situation could have an impact on the reputation of the Group and its employees.



Protection and reputation of the Group

22. Confidentiality



DEFINITION

Confidentiality and professional secrecy are the fundamental principles in the insurance and banking professions. They must be an ongoing concern for all employees, regardless of the area in which they perform their duties.



DETAILS

All information relating to customers, as well as to Crédit Agricole Assurances, the other entities of the Group, (their employees, their customers, and their internal organisation), its information systems, security procedures, suppliers and subcontractors, is confidential.

The disclosure of any confidential information makes the establishment and the employee involved liable. When this concerns non-public information of a listed company, a breach of confidentiality may be criminally, administratively and professionally sanctioned.



CAA's COMMITMENT

Crédit Agricole Assurances ensures confidentiality in all circumstances and applies it to all types of media. All Crédit Agricole Assurances employees are the custodians of and responsible for the confidential information they receive. Employees may use this information internally for professional purposes and make disclosures outside the Company only if authorised to do so or in the cases provided for by law.

Crédit Agricole Assurances employees must also apply the principle of confidentiality with the utmost rigour when using social media. They are responsible for everything they publish on the Internet regarding the Group and must ensure not to disseminate any information via the Internet that they would not divulge outside Crédit Agricole Assurances by any other means. This principle of confidentiality also applies to business social networks.



WHAT SHOULD I DO?

- Respect the strict confidentiality of the information to which you have access concerning customers of Crédit Agricole Assurances' and of the Group in general;
- Always obtain the express written authorisation of customers when you need to transmit a piece of confidential information that concerns them;
- Only share confidential information within Crédit Agricole Assurances and the Group, with the relevant persons and solely for the purposes of their duties;
- Classify email messages according to the level of confidentiality of the information contained therein;
- Always make sure that a confidentiality agreement exists before sharing confidential information with an external professional;
- Protect confidential information against unauthorised use and access;
- If you have any doubts about the information you want to diffuse on the social media, ask your manager or Compliance Manager beforehand.



WHAT SHOULDN'T I DO?

- Disclose any information about the Crédit Agricole Assurances Group or its customers to outside parties;
- Send any confidential information in personal emails;
- Post any information that could harm customers, your company, your function or the Crédit Agricole Assurances Group on the social or other media.



EXAMPLES

When travelling in public transport can I take advantage of the time to get on with my work?

Laptop screens without privacy filters can be easily read by other passengers. Do not work on confidential documents under such conditions. This also applies for tablets and mobile phones.

I have to draft the minutes of the Strategic Committee and a colleague offered to help me with the formatting. Can I email it to them?

You must guarantee the confidentiality of this document and limit its circulation. If your

colleague did not attend the Strategic Committee meeting, you cannot do this.

After a customer had had their benefits refused for medical reasons, an agent of their bank asked me for details concerning the refusal. Can I do this?

No. In no event can data relating to medical confidentiality be disclosed outside the Company, or even within it, to any persons who are not strictly entitled to have access to it, under the conditions provided for by law and the Belorgey/AERAS Code of Conduct.

23. Fight against money laundering and the financing of terrorism



DEFINITION

Money laundering and terrorist financing are phenomena of unprecedented scale. They affect our societies in general and the economic development of countries. This enables criminals to infiltrate financial institutions, control certain economic sectors and corrupt management bodies and governments, affect citizens' lives, and affect key principles such as democracy.



DETAILS

Money laundering is the act of legitimising money that is actually derived from illicit activities (organized crime, corruption, pimping, drugs and arms, tax fraud or human trafficking etc.). For its part, the financing of terrorism concerns the provision or raising of funds that may be used in the context of terrorist activities.



CAA's COMMITMENT

Crédit Agricole Assurances participates in the fight against money laundering and the financing of terrorism. As such, the Company monitors financial flows in compliance with the law relating to the protection of privacy, fundamental rights and freedoms of individuals, as well as the fight against discrimination and professional secrecy. All employees must participate, at their own level, in ensuring constant vigilance.

Any breach of obligation exposes directors, managers, and employees to civil, criminal, administrative and disciplinary liability. In addition, Crédit Agricole Assurances' image and reputation are at stake.



WHAT SHOULD I DO?

- Make sure you are kept informed on these topics even if you are not directly exposed by following the necessary training courses and complying with the internal procedures which apply in this area;
- If you are a manager, do your utmost to ensure that your employees are well informed about these topics;
- Implement anti-money laundering and anti-terrorist financing procedures;
- Pay particular attention to understanding your customers and their business activities;
- Remain vigilant at all times and look for any unusual, atypical, complex transactions that have no apparent economic justification and could clearly be illegal;
- Obtain explanations and convincing proof of the operations carried out by the customer, where appropriate;
- Refuse to carry out any transactions that are not economically justified or where there is any doubt as to the identities of the originators or the beneficiaries;
- Refer all suspicious transactions to the Compliance department.



WHAT SHOULDN'T I DO?

- Fail to respect compliance procedures for commercial reasons or other reasons;
- Tell customers that they are the subject of a statement of suspicion to the Financial Information Unit (formerly, Tracfin);
- Advise or assist in any fund placement, concealment or consolidation transaction.



EXAMPLES

I notice that the information provided by a customer /broker regarding an insurance transaction is incomplete. The customer raised the subject with me again to get the operation done quickly but seems reluctant to provide more details.

Even for apparently straight-forward transactions, such as the payment into an insurance contract of money from a property sale, check the source and consistency of the funds transferred, particularly if the amount of money contributed exceeds that of the sale.

In this case, the difference may stem from savings that are held by the customer elsewhere and which they want to invest in their contract. It could also be a bribe given by the buyer of the property. This practice, which is intended to reduce the selling price in order to limit the costs related to the amount of the transaction, is clearly illegal. This insurance transaction would then make this sum appear to be lawful.

If it is impossible to obtain any more information or supporting documents and the elements known about the customer do not remove the doubt surrounding the transaction, contact the Compliance Department immediately.

I have detected (or have been informed by a distribution network) that a shared customer is demonstrating signs of radicalisation or is behaving in a manner that suggests links with people or networks suspected of funding terrorist channels.

Collect all of the information about the unusual operations carried out. For example, I have a customer who indicates that they are planning to go to a country currently at war and wish to buy back, or cancel, all of their life insurance contracts.

If no rational reason can be found contact the Compliance Department.

24. | Fight against tax evasion



DEFINITION

Strictly speaking, tax evasion is the act of avoiding or reducing tax by declaring one's taxable wealth or profits in a country that is different from where they should be declared. Tax evasion concerns both companies and individuals that fail to declare their taxes.

In a wider sense, tax evasion involves using various legal means to reduce one's tax burden. This differs from tax fraud, which is an illegal practice.



DETAILS

Two tax measures, with which Crédit Agricole Assurances must comply, were set up to combat tax evasion namely, the Foreign Account Tax Compliance Act (FATCA) and the Automatic Exchange of Information (AEOI):

- FATCA was introduced to collect information on the assets and income held by US taxpayers ("US persons") living outside the United States;
- AEOI was an initiative of the OECD to carry out multilateral exchanges of information for the purposes of identifying the assets held by tax residents living outside their home jurisdiction.



CAA's COMMITMENT

Crédit Agricole Assurances considers that a consistent and responsible tax approach is an essential part of its long-term strategy.

Crédit Agricole Assurances treats all tax issues with integrity and transparency. All operations and transactions carried out are based on an economic reality and Crédit Agricole Assurances does not seek to avoid tax through structures provided for this purpose.

Crédit Agricole Assurances undertakes not to set up or propose operations exclusively for tax purposes, or to assist its customers in circumventing their tax obligations or operating in states or regions whose jurisdictions are categorised by the EU as "non-cooperative" (tax havens) or which do not take part in the Automatic Exchange of Information.



WHAT SHOULD I DO?

- Respect the laws and regulations in force in the states and territories where we carry out our activities;
- Request authorisation from the Group Tax Department, the Group Public Affairs Department and the Group Compliance Department, before authorising any investment by an entity in a non-cooperative foreign state or territory;
- Remain attentive to, identify and promptly report to the Compliance Manager any action aimed, directly or indirectly, at circumventing tax rules;
- Keep your customer knowledge files up to date with information regarding their tax residence (AEOI) and citizenship criterion (FATCA);
- If in doubt, contact your Compliance Manager.



WHAT SHOULDN'T I DO?

- Deliberately shield Crédit Agricole Assurances from its tax obligations;
- Advise a customer and/or participate in a financial arrangement aimed at circumventing tax rules;
- Sign any self-certifications on behalf of your customers;
- Remove or conceal any information for the purposes of covering up any evidence of an operation being linked to a tax haven.

EXAMPLE

I live in France and have dual Franco-American citizenship. I don't think I should be considered a US citizen.

As you have dual citizenship, you are considered a "U.S. Person" with the obligations attached thereto. Unlike most other jurisdictions, liability to US taxation is attached to citizenship not place of residence. This means that US citizens living abroad must file an annual US tax return, regardless of their place of residence.

25. | International sanctions



DEFINITION

International sanctions are measures taken by one or more states against natural and/or legal persons (for example freezing assets) and against countries or governments (embargo measures). Sanctions are taken to combat terrorism, nuclear proliferation activities and human rights violations.



DETAILS

Most of the international sanctions applicable at the level of Crédit Agricole Assurances and of the entire Crédit Agricole Group are issued, administered or enforced by the UN Security Council, the European Union, France and the United States, as well as by competent local authorities where the Group operates.



CAA's COMMITMENT

Crédit Agricole Assurances strives to ensure strict compliance with the law on international sanctions, which can be complex and of extraterritorial scope in countries and regions where the Group carries out its activities. Compliance with these requirements is ensured through the strengthening of internal procedures and of programmes ensuring compliance with the law on international sanctions. These are applicable to all Group employees, regardless of the country they work in and the size of their entity, and extend even beyond purely banking activities, including the area of insurance. Crédit Agricole Assurances does not tolerate any breach of international sanctions.



WHAT SHOULD I DO?

- Become well acquainted with, understand and comply with the Crédit Agricole Assurances' internal policies and procedures;
- Complete mandatory training courses and, for people exposed to such risks, the additional training courses intended for them;
- Remain attentive to, identify and promptly report to the International Sanctions Manager of the Compliance Department any violation or attempted violation of international sanctions, as well as any action taken, directly or indirectly;

- Ensure customer knowledge records are the subject of regular controls and updated;
- Check that the beneficiaries of services/payments are not subject to sanctions before benefit payments are made;
- Monitor the compliance of operations with international sanctions (freezing of assets and embargoes);
- If in doubt, contact your Compliance Manager and/or International Sanctions Manager.



WHAT SHOULDN'T I DO?

- Participate in any financial transactions that which is an intervention or involves parties in countries under sanctions or in order to avoid international sanctions;
- Remove or conceal any information for the purposes of covering up evidence of a transaction with countries or persons that are subject to international sanctions;
- Modify tools or IT processes for the purposes of removing information that is useful for detecting the risk of international sanctions;
- Advise a customer and/or participate in a financial arrangement aimed at circumventing international sanctions.

EXAMPLE

I have dual Franco-American nationality and am an employee of Crédit Agricole Assurances. To which regulations should I refer?

You are considered a "U.S. Person" affiliated to the Group. As such, wherever you work, you must inform the Human Resources department of your status. In addition, you must read the technical note on this subject carefully. This is to ensure your compliance with the legal provisions of the Office of Foreign Assets Control (OFAC) that concern you and, in the exercise of your duties, comply with the international sanctions decided by the United States.

26. | Prevention of fraud



DEFINITION

Fraud is an intentional act that is carried out for the purposes of obtaining a material or intangible benefit, to the detriment of a third person or organisation.

In the case of the infringement of laws, regulations or internal rules, fraud is characterised by the infringements of the rights of others and the total or partial concealment of an operation, a set of operations or their characteristics.



DETAILS

Two types of fraud exist depending on the origin of the malicious parties involved:

- external fraud: an act carried out by individuals (customers or otherwise), on their own or in a group for the purposes of obtaining funds, documents or information they can use for their own benefit and to the detriment of a company, its customers or third parties;
- internal fraud: a malicious act carried out by an employee to the detriment of their company or of interests of any third parties managed by the company. Fraud can also be characterised by a malicious act carried out by an employee with the complicity of individuals outside the company. This is referred to as mixed fraud.



CAA's COMMITMENT

Crédit Agricole Assurances places great importance on the prevention of fraud, which uses a growing number of techniques that are becoming increasingly more sophisticated, particularly with the advent of digital transformation.

To combat the surge in the number of cases of fraud, it is essential to tackle the issue at both the upstream and downstream levels. All employees, whatever their duties, have a role to play in fraud prevention. Thanks to the daily vigilance of everyone in the Group we can prevent and detect attempts at fraud.



WHAT SHOULD I DO?

- Be well acquainted with the law and best practice concerning fraud prevention, and apply them responsibly with constant vigilance;
- If you suspect anything fraudulent or are in doubt, immediately alert your manager and the Compliance Department (by emailing alertfraudCAA@ca-assurances.) so that they can act quickly;
- If you have any doubts as to the identity of the sender of an email, forward the email to your IT contact;
- If you are a manager, you should evaluate the risk of fraud attached to your activities, and enforce the principles of good conduct as well as the general professional rules;
- Perform fraud-risk analysis at the start of the design process for all new products and activities;
- Respect the principle of segregation of duties, whereby those carrying out or executing an operation cannot approve or settle it.



WHAT SHOULDN'T I DO?

- Communicate your passwords to anyone, lend your access badge, or leave confidential information or documents on your desk;
- Open emails or attachments from an unknown sender;
- Discuss sensitive issues that could involve Crédit Agricole Assurances in public places;
- Use external supports (external hard drives or USB sticks) without taking precautions.



EXAMPLES

I've just received an email with an attachment from an unknown address. Can I open it?

To limit the risk of phishing and being infected by spyware, never open any email if you do not know the sender. If in doubt, transfer the email to your IT contact to perform the necessary checks.

A friend lent me his USB stick containing interesting articles. Can I use it at my place of work?

This could create computer security problems. As such, you must first make sure that the USB stick contains no viruses that could infect the information system.

27. | Prevention of market abuse



DEFINITION

Insider trading, share price manipulation and the dissemination of false or misleading information are all examples of market abuse. The fight against this market abuse allows the integrity and transparency of financial markets as well as public trust to be maintained. As such, it is the responsibility of everyone to respect the principle of equality of information between investors.

In the event of a breach of these rules, the entity concerned and the natural persons placed under its authority may be subject to disciplinary, pecuniary, civil and criminal penalties.



DETAILS

Insider information means specific information that has not been made public which involves, directly or indirectly, one or more listed issuers and which, if it had been made public, would be likely to have an appreciable influence on the prices of the financial instruments in question or the price of related financial instruments.

Using, transmitting and recommending this information for one's own account or for that of a third party constitutes insider trading and is prohibited and shall be sanctioned.



CAA's COMMITMENT

The Crédit Agricole Assurances Group has implemented a system of information barriers to protect insider information. In accordance with these provisions, people privy to insider information must comply with the insider information management mechanism set up within their entity.

These information barriers also allow the strict control of exchanges between people who, because of their function, have access to insider information, and those who do not. In particular, this involves the physical separation of people carrying out sensitive activities or functions from those who do not.



WHAT SHOULD I DO?

- Be attentive and take all necessary measures to avoid disclosing any insider information. This means respecting the information barriers in place;
- If you are on an insider list, you must abide by the associated abstention obligations;
- If you think you are in possession of insider information, tell your manager who will inform the Compliance Manager;
- Immediately report any transaction where there is a suspicion of market to the Compliance Manager;
- Preserve the confidential nature of any suspicious transaction declarations and, as such, do not communicate with those suspected of having committed market abuse, proven or otherwise.



WHAT SHOULDN'T I DO?

- Use insider information when acquiring or transferring instruments, contracts, or financial or stock market securities to which this information relates, whether for your own account, or on behalf of Crédit Agricole Assurances or that of a third party;
- Communicate insider information to a third party outside the normal scope of your duties, to persons outside Crédit Agricole Assurances, or to employees who are not authorised to access such information;
- Recommend taking positions on a security based on insider information to any third party (employee of the entity or another group entity, or an external third party, etc.).



EXAMPLES

During the morning coffee break, I overheard someone talking about a listed company that is planning to take over another listed company. After checking it out, I found out that this information had not at that time been made public. Can I perform any financial transactions on these two stocks knowing that the information was not directly and clearly given to me?

No. In France, the Financial Markets Authority (Autorité des marchés financiers - AMF) consi-

ders an “insider” to be any person who obtains insider information in the course of their duties, profession or by any other means.

I am in the metro with a colleague and would like to go over something that was brought up during a meeting. Can I talk about it right away?

Wait until you're somewhere private before discussing it: this will limit the risk of disclosing possibly privileged information that could be overheard by a malicious individual.

28. | Using social networks



DEFINITION

The term “social networks” generally refers to all websites that can be used to build a network of personal or professional contacts and to exchange opinions or information.



DETAILS

Social media (social networks, blogs, forums etc.) are now part of our everyday life and concern all Crédit Agricole Assurances personnel, at both the personal and professional levels. However, they present risks and, given the number of different media platforms and the volume of information exchanged on them, mastering this form of communication has become a real challenge.



CAA's COMMITMENT

Crédit Agricole Assurances' strategy is to be present on many of these social media networks (Twitter, LinkedIn, Instagram and YouTube), so that it can share corporate news, and respond to customer and stakeholder requests, while taking note of any remarks made about the Group and its services.

Except in cases where it is abused, all Crédit Agricole Assurances' employees enjoy freedom of expression both inside and outside the Company. Nevertheless, everyone must act responsibly by behaving in an appropriate manner and adopting best practices. Employees may use the social networks for private purposes at their workstation provided they do not abuse this privilege but use it properly, on an ad hoc basis, and without overstepping their right to freedom of expression to the detriment of the Company, its executives and managers and workplace colleagues.



WHAT SHOULD I DO?

- Respect the rules of confidentiality and secrecy to which you are bound by professional obligation;
- Be aware of the general conditions of use about how your personal data and the information you put online may be used;
- Pay particular attention to social media networks whose servers are hosted in a foreign country, which may have different personal data protection rules than those in France;
- Check your settings functionalities to ensure the confidentiality of your profile and comments;
- Specify that your remarks are your sole responsibility and express your personal opinion;
- Do not intervene directly if you read any negative or slanderous comments about the Group so as to avoid giving the authors more visibility. When you come across such comments, forward them to the Communications department;
- If in doubt about the nature of the information, do nothing and ask your manager.



WHAT SHOULDN'T I DO?

- Carry out your business activity on the social media without having obtained authorisation from your manager or having carried out a risk analysis;
- Express yourself officially on behalf of Crédit Agricole Assurances if you are not a spokesperson appointed by the Communications Department;
- Make any remarks that could harm your position or Crédit Agricole Assurances and its employees;
- Make comments such as malicious criticism or insults, or remarks of a disparaging, defamatory or indiscreet nature or divulge any confidential information;
- Use information that is protected by Crédit Agricole Assurances copyright without having obtained prior written consent from the relevant department or, failing that, from the Communications Department.



EXAMPLES

I took some pictures at the farewell drinks party of one of my colleagues, and would like to publish them on my personal page as a souvenir.

To respect the right to the protection of one's image, ask prior authorisation from the people concerned. For any publication, you must assess whether there is a risk that it could harm your reputation or that of any other natural or legal persons.

As part of a new project, a colleague suggested I create a group on LinkedIn so that we could exchange information between ourselves and share documents.

Refuse: Crédit Agricole Assurances does not permit its employees to exercise their business activity on the social networks, except in very exceptional cases. Instead, suggest you open a MOCCA community to facilitate your collaboration.

I want to create or update my LinkedIn account, and publish information about my activity with Crédit Agricole Assurances.

You can present your duties and the activity of the Company in general. But do not share any confidential information. Refrain also from mentioning any of your "sensitive" duties.

