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## I. OUR COMMITMENT

On 11/12/2019, Eurofactor published the group-wide Crédit Agricole Ethics Charter (SO Vulnerability Analysis Money Laundering and Fraud, Annex 5 Code of Conduct), which underlines the group values of customer focus, responsibility and solidarity. This reference document, which binds Eurofactor as well as all Crédit Agricole Group companies, sets out the principles of action and conduct to be observed in relation to our customers and all our stakeholders, including employees, suppliers, service providers, representatives of the State, associations and non-governmental organizations, shareholders and investors.

While the Ethics Charter sets out our commitments, identity and values, as well as the principles underlying our actions, our Code of Conduct puts the commitments from the Ethics Charter into practice and forms the basis for the ethical and professional behavior to be observed by all Group employees. The Code of Conduct is intended to provide guidance in our daily actions, decisions and behavior. It is the result of a collaborative effort involving the various business lines of the Crédit Agricole Group and a joint project that mobilized experts in several departments (Human Resources, Corporate Communications, Compliance, Legal).

In addition to applying all the legal, regulatory and professional rules to which our various activities are subject, the Code of Conduct reflects our determination to do even more to serve our customers and all our stakeholders in the best possible way.

## II. USE OF OUR CODE OF CONDUCT

### TO WHOM APPLIES THE CODE OF CONDUCT?

The Code of Conduct applies to everyone, whether business managers, directors, , other officers or employees, regardless of their position or function at Eurofactor.

### OBJECTIVES AND INTERPRETATION OF THE CODE

The Code of Conduct has been prepared to guide us in our actions and help us make decisions in accordance with the Group's ethical rules and values and the law. It explains, theme by theme, the behavior to be exhibited and encouraged in our daily work, in the performance of our duties and in our working relationships. The various topics are divided into four sections:

- Relations with customers and suppliers,
- Social, environmental and community affairs,
- Anti-corruption, and
- Group protection and reputation.

Note that the cross-functional topic of conflicts of interest is addressed in the anti-corruption section. The Code of Conduct is not intended to be exhaustive. Nor will it be able to answer all questions or address all possible cases, especially with regard to what you should and should not do. For this reason, everyone should ask themselves the following questions in all situations and when making decisions:

### FIVE QUESTIONS TO ENSURE ETHICAL BEHAVIOR

1. is it legal?
2. is it in accordance with the Group's ethical charter and code of conduct?
3. is it in the interest of our customers and stakeholders?
4. have I considered the associated risks and possible consequences of my decision?
5. would I agree to my decision being publicized internally and externally?

If the answer to even one of these questions is "no," or if you are in doubt, you need to discuss this with someone before taking action. You can consult your manager, or Compliance, Human Resources, Legal or any other department qualified to address this issue and record any issues that have arisen.

#### WHO OVERSEES THE IMPLEMENTATION OF THE CODE? WHO UPDATES IT?

An interdisciplinary team, supported by the heads of Compliance and Human Resources, is responsible for implementing, monitoring and updating the Code of Conduct. The content of the Code may change over time. The Code does not replace Eurofactor's internal rules and procedures. It is your duty and responsibility to consult and apply them.

The Eurofactor Code of Conduct is a tool and guidance and helps us to better explain our professional obligations and behave in accordance with the ethics and values of the Crédit Agricole Group and Eurofactor.

#### HOW IS THE CODE OF CONDUCT MADE AVAILABLE? HOW IS IT MADE VISIBLE?

The Code of Conduct is published and shared with stakeholders. It is available on Eurofactor's website and intranet.

#### WHAT ARE THE OBLIGATIONS OF EMPLOYEES?

Everyone must familiarize themselves with the principles set forth in the Code of Conduct and comply with them in the performance of their duties. In addition, everyone must transmit and advance the values and principles set forth in the Code of Conduct with prudence and to the best of their ability. In addition, everyone must participate in training programs offered on the topics discussed in the Code of Conduct.

#### A RULE OF PRINCIPLE

Whenever you notice or suspect an action or behavior that is contrary to this Code of Conduct, or if you feel pressured to do so, you must immediately discuss it with your supervisor.

#### WHAT IS WHISTLEBLOWING?

The aim of the whistleblowing system is to strengthen risk prevention by giving all internal and external employees and business partners the opportunity to report facts that fall within the scope of the whistleblowing procedure. An internal whistleblowing procedure designed to capture alerts has been established.

#### EXPECTATIONS OF MANAGERS AND THEIR ROLE

As a leader, you must ensure that your teams know that you are always listening to their concerns. You must create a climate of trust so that employees do not hesitate to seek your advice when problems arise. You need to be able to explain the features of the code as well as how to apply them. To do this, you must refer to the Code of Conduct as well as the Ethics Charter and internal regulations. If you have any questions, do not hesitate to consult the most qualified department to address the issue at hand (Compliance, Human Resources, etc.). You must be attentive, be transparent yourself and set a good example to your teams. Show that it is fully possible to achieve the objectives set while upholding the ethics and values of the Crédit Agricole Group.

### III. OUR RULES OF CONDUCT

#### ETHICAL EVERY DAY PRACTICE

##### DEFINITION

Ethics is a question of morals; it refers to values, especially those of the company. These values should guide our decisions and professional behavior. Expressed as professional rules of conduct that underline our activity, they define our ethical approach.

##### DETAILS

Ethics concerns:

- Company-specific values formulated as guiding concepts (for example, customer satisfaction, responsibility, respect) and developed into the company's "principles of action" (for example, the fight against discrimination).
- The endorsement of these values and their ethical framework, and their implementation by the highest level of corporate governance.
- A general mandate to publicize and enforce values, principles and rules of conduct in such a way that the ethical framework creates a sense of belonging to the company and the trust necessary for working life and relationships with stakeholders.

Compliance refers to a regulatory environment in terms of the rules applicable to financial institutions, as well as the means for complying with them via:

- The implementation of internal rules and procedures that are translated into internal company rules and regulations.
- The existence of a regulatory and control function performed by a high-level executive that allows the company to avoid high non-compliance risks, especially in regulated business areas.

While ethics promotes the observance of values and rules of conduct, the goal of compliance is to avoid violations of the ethical framework and the law in order to protect the company from sanctions and threats to its reputation or brand image.

#### ACTING ETHICALLY MEANS:

##### BEING RESPONSIBLE IN OUR RELATIONSHIPS WITH CUSTOMERS AND SUPPLIERS.

All relationships must be established in accordance with the principles of loyalty and solidarity and in accordance with the commitments made to our customers and suppliers. Decisions must be made with priority given to customer interests and in compliance with the principle of fair and equitable supplier selection and competition rules.

##### RESPECT FOR EACH INDIVIDUAL

With regard to relations between the company's employees or with all its stakeholders, human rights as well as fundamental social rights must be strictly respected.

Avoiding any form of discrimination or harassment, promoting diversity and gender equality, complying with health and safety measures, and ensuring the protection of employee and customer data: By observing these principles, we create a positive working environment that is a source of performance and satisfaction.

##### RESPECT FOR THE COMPANY'S ENVIRONMENTAL AND SOCIAL COMMITMENTS

For Eurofactor, this involves implementing a long-term strategy for our customers so that we can share the value thus created. All business managers, directors, other executives and employees act as ambassadors for our Corporate Social Responsibility (CSR) approach, which is designed to strive for excellence and manage risk in relationships with customers and employees.

##### PREVENTION AND DETECTION OF CORRUPTION AND ABUSE OF INFLUENCE

The fight against corruption is a major objective for the good of society. With regard to the prevention of corruption and abuse of influence, Eurofactor must live its values, in particular: Honesty, Integrity, Loyalty, Transparency, Impartiality.

The anti-corruption component includes the principles of implementing appropriate measures to prevent, detect and deter corrupt practices or abusive influence through "zero tolerance". Other areas include gifts and entertainment, kickbacks, conflicts of interest, patronage, sponsorship and lobbying.

##### BE VIGILANT EVERY DAY

To maintain trust, we must take responsibility for the use of resources and information available in the company and guard against any risk of conflict of interest. We must also ensure that we do not inappropriately disseminate or use confidential information in our possession on our behalf or on behalf of a third party.

Everyone's vigilance must enable us to protect our customers' interests, combat money laundering and terrorist financing, comply with international sanctions laws, combat tax evasion, prevent fraud and protect the integrity of the markets.

## REFRAINING FROM ACTIONS THAT COULD DAMAGE EUROFACTOR'S REPUTATION

We are responsible for maintaining the image of Eurofactor and the Group, both internally and externally. The risk of negative publicity, particularly on social networks, could damage the image of Eurofactor and the Crédit Agricole Group and weaken our customers' confidence in our Group.

To avoid this, we must take care to safeguard our reputation by complying with all the principles set out in this Code, ensuring that we do not make comments that could commit Eurofactor and the Crédit Agricole Group, that we do not reveal confidential information about their professional environment and that we do not participate in the spread of rumors.

## RELATIONSHIPS WITH CLIENTS AND SUPPLIERS

### 1. CLIENT RELATIONSHIPS

#### DEFINITION

Eurofactor places the trust and satisfaction of its customers at the center of its actions. Eurofactor wants all its employees to be involved in this relationship so that the customer's interest is at the forefront of all actions performed by its employees, including those who perform a support function.

#### DETAILS

Satisfaction surveys are conducted to ensure that customer expectations are met. Customer complaints are handled with the utmost attention internally, with a focus on continuous improvement of our services and striving for excellence in our customer relationships. Employees are offered regular training, regardless of whether they have a direct relationship with customers or not.

#### EUROFACTOR'S COMMITMENT

Eurofactor is built on creating global and sustainable relationships with its clients. Conceived in the spirit of a true partnership, our company is committed to supporting its clients at all times, helping them achieve their goals and advising them in their decision-making by proposing solutions tailored to their specific needs.

Eurofactor is also committed to providing support and services to all its customers, in particular through warnings of risky situations and support in difficult times. In addition, Eurofactor constantly invests and innovates to develop and strengthen its customer relationships. We choose an approach that consistently combines efficiency and customer focus. This approach meets the protection of personal data without compromise.

What should I do?

Listen to your customers and consider their interests in every action you recommend.

- Know your customers better, respecting their privacy rights, so you can advise and assist them appropriately.
- Always provide customers with clear and accurate information that is not misleading.
- Be vigilant to prevent fraud in any form, protect customers, and combat money laundering, terrorist financing, corruption, etc.
- Report any failure of protection mechanisms and any situation that could lead to a conflict of interest to your manager.

What should I not do?

- Put your personal interests or those of Eurofactor ahead of the interests of your clients.
- Assist clients in actions designed to violate laws and regulations.
- Recommend a product or process that has not yet been approved internally.

## 2. PERSONAL DATA OF CLIENTS

### DEFINITION

A Group-wide code has been drawn up on the use of our customers' personal data. This code provides a reference framework for employees who process this type of data. It is a reminder of the commitment Eurofactor has made to its customers and the best practices to be followed.

### EUROFACTOR'S COMMITMENT

Eurofactor has taken a stance on the sensitive issue of personal data by committing to act in an ethical and responsible manner and by opting for a transparent and instructive approach in dealing with its clients.

What should I do.

- Involve the data protection officer in projects from the outset to ensure compliance with all personal data protection regulations.
- In the same way, involve the IT risk manager in projects.
- Ensure that the project adheres to the principles of the Code: Security, Integrity and Reliability, Ethics, Transparency and Information, etc.
- In case of doubt, always contact your Data Protection Officer.

What should I not do.

- Propose a project that involves the processing of personal data without having checked your project's compliance with the Data Protection Officer.

- Use personal data in any way that violates the principles set forth in the Code or the values set forth in the Group's customer project.
- Process personal data in a way that is misappropriated or without prior knowledge of the client.
- Violate the rules and recommendations established within the Group to ensure the security and confidentiality of Personal Data, in particular by granting access to such data to unauthorized persons.

### 3. FAIR CHOICE OF SUPPLIERS

#### DEFINITION

A fair and equitable choice of a supplier must ensure that all service providers are treated equally.

#### DETAILS

The fair choice of supplier must be made as a result of fair competition between bidding companies through a competitive bidding process. The choice must be based on objective elements that include, in particular, respect for human rights and fundamental freedoms.

#### EUROFACTOR'S COMMITMENT

In order for this choice to be fair, all companies must be treated equally by buyers, decision-makers and other Eurofactor employees concerned, and the choice must be based on objective elements. This implies that buyers, decision-makers and other Eurofactor employees adopt a responsible and fair attitude towards bidding companies during the bidding process. Consequently, the exclusive consideration of individual interests in the selection of the company must be avoided.

What should I do?

- Report risks of potential conflicts of interest (for example, a family member's employment in one of the bidding companies involved in the bidding process, etc.).
- Ensure that all bidding firms receive a response within a sufficient and identical timeframe. To ensure this, the RFP documents must be distributed after all bidding firms have been identified and no additional firms may be added to the list once the RFP process has begun.
- Ensure that all bidding firms interviewed receive the same initial and modified information, data, and documentation materials (bidding documents, specifications, technical documents, functional documents, etc.).
- In the case of oral interviews, ensure that all bidder companies are invited to one or more of these meetings, the duration of which must be the same for each company interviewed.

What should I not do?

- During bidding procedures, provide information only to some of the companies invited to participate.



- Provide indications to the bidding companies about the content of the bids or the response rate of the other companies participating in the bidding process.
- Accept invitations, gifts, or in-kind services from one or more of the bidding companies during the bidding process or contract negotiation phase. Once the contract negotiation phase is completed, the rules for gifts and invitations will come into effect (see SO Compliance as amended from time to time).
- Modify the selection criteria and/or ranking weighting according to the date of receipt of responses to the RFP process.

#### 4. RESPONSIBLE RELATIONSHIPS WITH SUPPLIERS

##### DEFINITION

It is necessary to apply appropriate due diligence to ensure that all actors in the supply chain act in accordance with a number of obligations and principles, in particular with regard to respect for human rights and fundamental freedoms, workplace policies, combating all forms of discrimination, promoting diversity, and environmental protection and business ethics. If an actor in the supply chain fails to comply with these commitments and principles, the Group's performance, reputation and image could be seriously affected.

##### EUROFACTOR'S COMMITMENT

The commitments and principles include:

- Financial equality: compensate suppliers in accordance with applicable laws and regulations.
- Equal treatment
- Transparency of our processes
- Promotion of sustainable relationships
- Preventing corruption by complying with rules known to suppliers
- Conducting a comprehensive cost analysis of all costs incurred during the useful life of the goods or services
- Integrating social and environmental performance (CSR) into supplier selection criteria
- Promoting the regions by selecting local suppliers where possible and appropriate

The diversity of these commitments and principles includes not only buyers, but all employees involved in a supplier relationship.

What should I do?

- Be honest in dealing with suppliers to create a bond of trust, regardless of whether the relationship is one-time or long-term.
- Involve a buyer suitable to guarantee the entire purchasing process and to manage risks, especially at the legal, financial and operational levels.

- Leave it to the buyer to inform the companies (bidders) that were not selected as a result of the bidding process and provide objective criteria that justify this decision.
- Compare the bids submitted by the interviewed suppliers with all the bidding criteria, including the total cost.
- Maintain a sufficient turnaround time in the event of a supplier change to provide that supplier with a feasible and acceptable cancellation period.

What should I not do?

- During an informal or formal exchange with a supplier, disclose information about Crédit Agricole Group strategy and other sensitive data that would not be publicly available.
- Verify the receipt of services without taking care of the further processing and payment of supplier invoices and, in particular, respecting the payment deadlines imposed by laws and regulations.
- Not analyzing or taking into account all the criteria that may lead to the economic dependence of the supplier after its choice and during the company's relationship with it.
- Terminate a contract without giving the supplier sufficient advance notice of such termination to allow the supplier to reorganize its business.

## 5. COMPETITION

### DEFINITION

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

### DETAILS

Many types of conduct, such as cartels and abuse of a dominant position, can threaten free competition. A cartel is an agreement, concerted practice, or planned and intended collaboration between companies whose purpose or effect, itself potentially, is to coordinate their behavior in order to restrict competition. Collusion with a business, whether with a competitor or not, may take the form of an oral, written, formal or informal agreement (during a business lunch, or at a trade association event, etc.). In addition to the most serious forms of cartel agreements (such as the joint fixing of sales prices or terms of trade), the sharing of customers or markets, the coordination of bids, 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 schemes aimed at eliminating competitors, or economic foreclosure strategies and discriminatory practices, etc.

### EUROFACTOR'S COMMITMENT

All Eurofactor activities must be carried out in accordance with competition law, the principle being that companies operating in a market must determine their strategy in an autonomous manner. Agreements between independent companies and abuses of a dominant position are therefore strictly prohibited. Sensitive information is non-public data of strategic value (information on prices

and trends, customer lists, market capacity and distribution methods, strategy and costs, etc.). However, it is possible to share certain information with Eurofactor's competitors once it has been made public and provided that it relates to a topic of general interest to the industry or that falls within the scope of activities of trade associations. This information must then be aggregated and not separable (based on statistics).

What should I do?

- When interacting with third parties, avoid bringing up sensitive topics regardless of the context.
- If these topics come up, end the conversation and immediately inform your supervisor and the Compliance Department.
- If in doubt about the level of sensitivity of the information, consult the head of the Compliance Department before engaging in discussions with a competitor or trade association.
- In connection with formal and necessary relationships with competitors, specify the purpose of the exchange, limit the discussion strictly to its purpose and keep a written record.
- Contact the Compliance Department before entering into contracts that are likely to have a significant competitive effect on the relevant market.

What should I not do?

- Consult with a competitor and exchange information with that competitor about the pricing of internal financial services or consumer prices.
- Enter into customer, territory or market sharing agreements with competitors.
- Boycott certain customers or suppliers.
- Negotiate clauses, such as those that restrict the entrepreneurial freedom of trading partners, without seeking advice from the Legal Department.

## SOCIAL, ECOLOGICAL AND SOCIETAL MATTERS

### 6. PROTECTION OF DATA OF EMPLOYEES

#### DEFINITION

Everyone has the right to respect for their privacy. Personal data may only be collected, processed and stored for specific and legitimate purposes. All employees must be made aware of this information.

#### DETAILS

The use of data is strictly regulated:

- Only data that are relevant and necessary for the clearly defined, established objectives in advance may be processed.
- Personal data may not be stored for an unlimited period of time.

- The necessary measures must be taken to guarantee the confidentiality of data and to prevent their disclosure to unauthorized third parties.
- Everyone must be informed about the processing of their personal data. All employees are also authorized to access and modify their information and may object to its processing for legitimate reasons.

The destruction, loss, alteration, disclosure or unauthorized access to personal data may violate rights of individuals as well as individual and collective rights of employees. Internal rules and procedures must therefore be observed.

## EUROFACTOR'S COMMITMENT

In a context where individuals are increasingly asked to communicate their personal data in paperless form, the Crédit Agricole Group has established a Code of Ethics based on five principles: Integrity and Reliability, Ethics, Transparency and Information, Security and Customer Control over the use of their data.

As an employer, Eurofactor 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 and relevance of the information collected.
- Ensure, when necessary, that the manner in which personal data is used is entered into the personal data processing register in accordance with internal procedures.
- Inform our employees how the personal data they provide will be used.
- Guarantee employees' right to data protection, in particular by ensuring that their information is not transferred to unauthorized persons and that personal data is kept secure.
- Request that any inaccurate or incomplete data be completed or removed. In the case of subcontracting, ensure that service providers adhere to the same principles.

What should I not do?

- Collect personal information that does not correspond to a specific and necessary use.
- Communicate personal information to unauthorized internal or external third parties without the explicit consent of the data subjects.
- Retain personal data without authorization.

## 7. HEALTH AND SECURITY AT AT WORK DEFINITION

Companies must take the necessary steps to ensure the safety and protection of the physical and mental health of their employees. These measures include, in particular, the implementation of an occupational risk prevention strategy and employee training.

## EUROFACTOR'S COMMITMENT

Everyone who works at or for Eurofactor must be able to reach their full potential in a safe and secure environment. Eurofactor is committed to taking all necessary measures to ensure the safety and protection of the physical and mental health of its employees. However, safety in the workplace depends on all of us. All company employees, in accordance with their training and to the best of their ability, must take care of their safety and health, as well as the safety and health of others who may be affected by their actions or omissions at work.

What should I do?

- Familiarize yourself with and comply with Eurofactor's health and safety rules.
- Ensure that your actions and behaviors do not pose a risk to you or to others.
- Contribute to safety in the workplace. This includes participating in safety drills and employee briefings organized by the company, and informing management and safety representatives of situations that could pose a safety hazard in the workplace.

What should I not do?

- Ignore Eurofactor's rules on health and safety at work.
- Ignore any situation that could affect the safety of our working environment.

## 8. PROTECTION AGAINST DISCRIMINATION

### DEFINITION

Discrimination is a form of unequal treatment based on a prohibited criterion and falls within the scope of legislation. Under certain conditions, discrimination is the differentiation of a person on the basis of a set of criteria or distinctive characteristics.

### DETAILS

The General Equal Treatment Act (AGG) currently in force defines eight discrimination criteria:

- Race
- Ethnic origin
- Gender
- Religion
- Worldview
- Disability
- Age group

- Sexual identity

Direct discrimination can mean the following:

"the situation in which ... a person experiences less favorable treatment than other persons in a comparable situation experience, have experienced, or would experience."

or indirectly:

"An apparently neutral provision, criterion, or practice that may be particularly disadvantageous to persons compared to other persons for any of the reasons set forth in the first section, unless that provision, criterion, or practice is objectively justified by a legitimate aim and the means of achieving that aim are necessary and appropriate."

## EUROFACTOR'S COMMITMENT

Eurofactor is committed to raising awareness of non-discrimination issues among its business leaders, managers and employees. In order to promote equality and diversity, employees must feel that they are treated fairly from the moment they join the company and throughout their employment with the company. A work environment where everyone feels respected, regardless of their unique characters, boosts performance and promotes motivation.

What should I do?

- Reject all forms of discrimination against employees, customers, suppliers, service providers and others who have a relationship with Eurofactor.
- Not accept any practice or behavior that would discriminate against employees, suppliers, customers, etc. Seek support, discussion and guidance from your supervisor and Human Resources as needed.
- As a manager, be careful to base your decisions on objective criteria and not to take advantage.

What should I not do?

- Treat people differently based on criteria prohibited by law, putting them at a disadvantage compared to others.
- Contribute to the creation of a hostile climate that fosters discrimination.

## 9. DIVERSITY AND GENDER EQUALITY

### DEFINITION

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

### DETAILS

For companies with 20 or more employees, 5% of employees must be persons with disabilities employed on a full or part-time basis. Companies that do not meet this obligation must pay compensation to the Integration Office.

#### EUROFACTOR'S COMMITMENT

In addition to these legal obligations, Eurofactor believes that diversity is a factor that enhances performance and attractiveness. Promoting gender diversity is about creating an open and accountable corporate culture that fosters internal cohesion and progress. Teams with diverse profiles and talents reflect the company and allow us to invent new models, better meet our customers' expectations and, as such, benefit everyone. This commitment is reflected in concrete actions, such as the promotion of women to positions of leadership responsibility and within the management committees, or the integration of people with disabilities.

What should I do?

- Take care to exercise objective judgment with a focus on qualifications in all management decisions.
- Seek diverse opinions to promote objectivity.
- Ensure that your teams have a balance of women and men.

What should I not do?

- Make a decision based on non-objective criteria.
- Implement processes that could lead to gender inequality or even discrimination, even if those processes were originally designed to eliminate inequalities.

## 10. THE FIGHT AGAINST MOBBING AND SEXUAL HARRASMENT

### DEFINITION

Mobbing is defined as comments or behavior whose purpose or effect is to bring about a deterioration in working conditions and which may affect the rights and dignity of other persons, harm their physical and mental health or affect their professional future.

### DETAILS

Bullying can take several forms:

- Derogatory remarks
- Humiliation or harassment
- Insults

Sexual harassment is the act of making sexual or sexist comments to a person or imposing sexual behavior on them in order to degrade them because of the demeaning or humiliating nature of those comments or behavior, or to create an intimidating, hostile, or offensive environment. Sexual

harassment also includes any form of recurring or non-recurring coercion for the purpose of achieving sexual acts, whether for the benefit of the perpetrator or for the benefit of a third party.

## EUROFACTOR'S COMMITMENT

Eurofactor is committed to ensuring the prevention, detection and elimination of such acts, which constitute criminal offenses and are punishable by severe penalties. Any employee who believes in good faith that he or she is a victim of bullying or sexual harassment may request an immediate hearing through Human Resources or with the Compliance Officer. No employee, trainee or intern may be sanctioned, discharged or discriminated against for suffering or resisting sexual harassment or bullying, or for witnessing or disclosing related acts.

What should I do?

- Familiarize yourself with internal prevention and action policies and procedures.
- Pay attention to everyone around you, optionally contacting Human Resources or the Compliance Officer if you become aware of an instance of bullying or sexual harassment.

What should I not do?

- Ignore a mobbing or harassment situation that you learn about, whether as a victim or as a witness, regardless of the reason or perceived severity.

## 11. PART-TIME ACTIVITIES

### DEFINITION

A secondary activity is an activity that you perform outside your working hours. The term multiple activity can be defined as the simultaneous pursuit of two or more activities of a professional, trade union, or political nature by the same person.

### DETAILS

Being engaged in a paid activity does not prevent you from simultaneously engaging in an independent or self-employed activity. Accumulation of activities is possible because only paid activities are subject to working time regulations. Thus, employees can perform an activity in a social form, for example (non-profit organization). However, while the principle is freedom of work, employees must comply with a professional code of ethics in relation to their employers. In fact, employees are bound by a duty of loyalty to their employer for the duration of their employment contract. Generally, this obligation includes not damaging the reputation or preventing the proper functioning of the company, especially by disparaging it or by using competitive practices that are contrary to the company's interests.

What should I do?

- Inform your supervisor in advance if you plan to engage in any compensated activity outside of your work hours (except for scientific, literary or artistic work).



- Be transparent with your supervisor and disclose the status of your situation to the Compliance Officer.
- Live up to the obligation of confidentiality, secrecy and the protection of business secrets. Be familiar with the terms of your employment contract to apply the clauses you are obligated to comply with. Have your obligations explained to you by Human Resources as needed.

What should I not do?

- Engage in any activity during the term of your employment contract that competes with your employment with the Company (including using a leave of absence to perform a paid activity or to attend training at a company, whether or not it is a competitor).
- Engage in any avocational activity in addition to your professional activity that could prevent you from achieving the objectives defined in connection with your paid activity or that could create conflicts of interest.
- Engage in your avocational activity during the working hours specified in your contract.
- Use operating funds and resources provided to you as part of your job for your part-time activities.

## 12. ENVIRONMENTAL STRATEGY

### DEFINITION

The European Commission defines Corporate Social Responsibility (CSR) as the responsibility of companies regarding the impact of their actions on society and, in particular, how companies voluntarily integrate social and environmental concerns into their operations and interactions with their stakeholders.

### DETAILS

Businesses must contribute to sustainable development, including the health and well-being of society. To do so, they must commit to the following:

- Take stakeholders' expectations into account.
- Fully meet or exceed legal obligations.
- Invest more in human capital and the environment, integrating this responsibility across the company and implementing it in all internal and external relationships.

### EUROFACTOR'S COMMITMENT

Eurofactor demonstrates its environmental approach in all its business units and in its corporate activities with several objectives:

Reducing direct environmental impact:

- By creating momentum on environmental issues.
- By continuously improving eco-efficiency.
- By conserving resources.

- By reducing energy consumption and the direct carbon footprint.
- By reducing the amount of waste generated at the sites.
- By optimizing waste recycling.
- By incorporating environmental requirements into supplier selection criteria.

What should I do?

- Perceive active environmental protection as core to the 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 behavior on the environment.
- Take personal responsibility and consider the direct and indirect environmental impacts generated by your professional activities.
- Commit to contributing to the Group's environmental goals and actions, especially when speaking with customers and stakeholders and when making statements outside the company.

What should I not do?

- Ignore the Group's environmental goals and commitments.
- Assume that Eurofactor is not affected by the environment.

### 13. CONTRIBUTION TO THE REGIONS

#### DEFINITION

Committed more than ever to promoting its cooperative and mutual corporate values, the Crédit Agricole Group contributes every day to the development of the regions by strongly supporting their economic and social initiatives.

#### EUROFACTOR'S COMMITMENT

The Crédit Agricole Group's goal is to achieve a positive regional presence. By promoting local entrepreneurship and agricultural and rural development, the Crédit Agricole Group facilitates a wide range of economic, social and cultural development initiatives.

Eurofactor, in line with its values of innovation, customer focus, commitment, team spirit and partnership, makes an important contribution in this regard.

What should I do?

- Understand that regional support is an integral part of the Group's corporate culture. Close customer relations, responsibility and solidarity are the values that should encourage you to contribute to actions aimed at improving regional development conditions.
- Also consider local characteristics in your professional activities.

What should I not do?

- Involve Eurofactor in actions that contradict the Group's regional commitments.

## ANTI-CORRUPTION

### DETAILS ON THE APPLICATION OF THE ANTI-CORRUPTION SECTION OF THE CODE OF CONDUCT

The general rules for the application of the Code of Conduct apply to the anti-corruption section and, in particular, to the exercise of reporting possibilities.

#### TO WHOM DO THE ANTI-CORRUPTION RULES APPLY?

The Anti-Corruption Code of Conduct applies to all Group employees, be they managers, directors, executives or employees (permanent and temporary employees, interns, working students and trainees), regardless of their position and duties within the Crédit Agricole Group, as well as to temporary workers employed by the Group (hereinafter referred to as "Employees"). This Code applies to the entire Group and its subsidiaries around the world.

#### WHAT ARE THE OBLIGATIONS OF EMPLOYEES?

The Anti-Corruption Code of Conduct is part of the Written Regulations of Eurofactor, (SO Compliance, Annex 4 Code of Conduct). Its application is mandatory. Everyone must be familiar with and act in accordance with the principles and rules of the SOs when performing their duties. We are all responsible for our actions and therefore have a constant duty of vigilance. Anyone who notices or suspects an act or behavior that is unfair in terms of the Group's values or rules, or who is pressured to commit an act that is unfair or illegal in terms of the Group's values, must inform his or her supervisor immediately. The Group's whistleblowing procedure allows anyone to report an anomaly to the Compliance Officer or, in certain cases, to the supervisory authority.

#### WHAT ARE THE CONSEQUENCES OF VIOLATING THE CODE?

The anti-corruption rules of conduct set out in this Code of Conduct refer to the SOs of Eurofactor. Corruption may result in measures under labor law or punishment under Sections 299, 300 or 331 et seq. StGB (German Criminal Code).

## 14. THE FIGHT AGAINST CORRUPTION

### DEFINITION

Corruption is the act of a person in a specific public or private capacity soliciting, proposing, or accepting a gift, offer, or promise for the purpose of performing, delaying, or omitting to perform an act that falls directly or indirectly within the scope of his or her duties.

### DETAILS

Under German law, the offenses of active bribery and conferring an advantage (committed by a person who makes a bribe) and passive bribery and acceptance of an advantage (committed by a person who accepts a bribe) are punishable by up to ten years' imprisonment (Sections 331 - 335 StGB). Active bribery/acceptance of advantage is an intentional act consisting in making offers,

promises, donations, gifts or other advantages, directly or indirectly, to public officials or private persons in the course of business, so that they will perform or refrain from performing an act within the scope of their duties. Passive bribery/acceptance of benefits concerns public officials or private individuals who, in the course of business, directly or indirectly solicit or authorize promises, donations, gifts or any benefits for themselves or for others in order to perform or refrain from performing any act within the scope of their duties.

## EUROFACTOR'S COMMITMENT

We operate a zero tolerance policy with respect to corruption, including facilitation payments (see CASA Note de Procedure 2018-43). No employee shall engage in bribery in any form for any reason. Corruption hinders free competition and impairs economic development; it can have very serious financial, business and criminal consequences that could cause serious damage to the Group's reputation and image. Any employee involved in an act of corruption will also face sanctions under labor law or even criminal law.

What should I do?

- If you feel pressure from a third party or are asked to participate in bribery, inform your supervisor and the Compliance Department.
- Internally, report all gifts and benefits worth more than €150 (per calendar year) offered or received to the Compliance Officer. Further, all gifts and benefits, regardless of value, are to be reported to the Compliance Officer, sent directly to your home.
- Comply with existing approval procedures for employee professional expenses. Constantly be mindful and monitor all your relationships with intermediaries and vendors.
- Comply with the group's defined hiring process.
- Ensure all payments are substantiated, documented and properly approved.

What should I not do?

- Offer, promise or agree with a third party an advantage (financial or otherwise) to induce them not to perform or refrain from performing an act in accordance with the rules.
- Solicit, receive or accept any benefit (financial or otherwise) in exchange for performing a task, giving consent under a business contractual relationship or taking any other action as part of your duties or activities.
- Favoring a third party in competitive bidding.
- Offer or accept gifts and benefits other than those authorized.
- Accepting a third party's offer to finance all or part of a trip for you, even if it is of a business nature.

## 15. FIGHT AGAINST ABUSIVE INFLUENCE AND INTERACTION WITH OFFICIALS

### DEFINITION

Abusive influence is, on the part of persons holding public office or entrusted with a public administrative function, or on the part of elected officials, the solicitation or illegal acceptance of offers, promises, donations, gifts, or benefits of any kind for themselves or for others with the purpose of using their actual or perceived influence to obtain awards, jobs, markets, or any other favorable decision by an agency or public administration.

## DETAILS

Abusive influence is the monetization of a person's position or real or perceived influence to influence a decision to be made by a third party. This involves three parties: the beneficiary (who grants the benefits or makes the donations), the intermediary (who exploits the credibility he or she has by virtue of his or her position), and the target person who has the decision-making power (authority or administration, judge, expert, etc.). Criminal law distinguishes between active abusive influence, which affects the beneficiary, and passive abusive influence, which affects the intermediary. Each of the two offenses is treated separately and punishable in the same way with a prison sentence of up to ten years.

## EUROFACTOR'S COMMITMENT

All employees must conduct business in accordance with the French anti-corruption regulations in force in the countries in which we operate. Offering gifts, gratuities or publicity to public officials is strictly prohibited. Certain activities involving public officials require special vigilance.

What should I do?

- If you are pressured or asked to participate in abusive influence by a public official, inform your supervisor and the Compliance Department. Follow procedures for activities involving public officials.
- Be constantly mindful and regularly monitor all transactions with officials.
- Ensure that all payments and expenditures involving officials are properly authorized, accounted for and documented.

What should I not do?

- Offer, promise or give a benefit (financial or otherwise) to a public official to induce him or her to perform or refrain from performing an act not in accordance with the rules.
- Favor a relative of a public official in a bidding or hiring process.
- Giving cash to public officials.

## 16. FIGHT AGAINST BRIBES

### DEFINITION

Bribes are usually small sums paid directly or indirectly to officials to carry out or expedite formal administrative actions. In particular, these payments are made in connection with the processing of visa applications, the issuance of permits, authorizations and licenses, and customs formalities.

## DETAILS

Bribes are considered as corrupt acts. These are prohibited by the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions of December 17, 1997 and the Law on Combating International Bribery of September 10, 1998.

## EUROFACTOR'S COMMITMENT

Bribes are strictly prohibited. Exceptions may be made only in special cases, particularly when the safety or physical integrity of an employee is at risk. In such cases, the Compliance Officer should be informed as soon as possible. In addition, bribes must be properly accounted for and recorded in the Company's books and documents.

What should I do?

- If you receive a request for a bribe from a public official, contact your supervisor or the Compliance Officer.
- Notify your supervisor or the Compliance Officer if you have engaged in a transaction that may be considered a bribe as part of an exceptional situation.
- Retain all documents related to any transaction that could be considered a kickback.

What should I not do?

- Offer, promise or give a benefit (financial or otherwise) to a public official in the course of performing a routine administrative duty.
- Mediate a request for a bribe on my own initiative.

## 17. CONFLICTS OF INTEREST

### DEFINITION

A conflict of interest exists when an employee's personal interests may conflict with those of Eurofactor - in other words, when the personal interests of employees or members of management bodies may influence their discretion or decision-making ability in the performance of their professional duties. Conflicts of interest may be of a personal nature (e.g. family ties), professional nature (e.g. trade relations), financial nature (e.g. personal loans) or political nature (influencing the company).

### EUROFACTOR'S COMMITMENT

Eurofactor has implemented an active policy to avoid conflicts of interest. Conflicts of interest may include acts of bribery or influence peddling and may expose the Company and its employees to accusations of partiality or dishonesty. They may also affect the reputation of the Group and its employees.

What should I do?

- Comply with Eurofactor's prevention policies and measures, especially those related to gifts and benefits, public relations and extra-professional activities, to ensure that your independent judgment is preserved and conflicts of interest are avoided.
- Report to your manager and the Compliance Officer any privately held administrative, management or executive positions with any commercial or not-for-profit organization, customer or supplier of the Group and seek prior approval to hold a position with a company outside the Group.
- Inform your supervisor of any personal or family ties you have with a third party relating to your business.
- Inform your Compliance Officer of any possible direct or indirect conflicts of interest, such as personal or family ties related to services or contracting, and refrain from participating in debates or decisions on the issues involved.

What should I not do?

- Make decisions when your judgment or choices could be influenced or altered by personal considerations or pressure from a third party.
- Conceal information about conflicts of interest or situations that could cause such a conflict.
- Take positions of interest with a competitor, customer or supplier.

## 18. GIFTS AND INVITATIONS

### DEFINITION

Promotional gifts are gifts given as part of business relationships. They can have a significant value (travel, electronic equipment, etc.) and are therefore monitored to avoid any risk of corruption. Invitations include any form of social gathering and invitations that are either offered or received. In the commercial context, these interactions take place in the context of public relations in the form of meals, hotel stays, seminars, meetings or conferences, or invitations to sports, cultural and social events, as well as business and press trips.

### EUROFACTOR'S COMMITMENT

Employees must not accept, directly or indirectly, any gift or invitation that could compromise, even unintentionally, their independence, impartiality or integrity. They must refuse any gift or invitation that could place them in a conflict of interest. Likewise, they are prohibited from soliciting gifts from individuals or companies that maintain or seek to establish business relationships with the Group.

The maximum value for gifts and benefits given and received is set at 150 euros per calendar year (see SO Compliance as amended). Before accepting gifts or benefits whose value exceeds the permitted amount, employees must submit a request to their supervisor, who must then notify the Compliance Officer.

Eurofactor does not prohibit employees from extending or accepting invitations for publicity. These are gestures of courtesy and welcome between business partners. However, such public relations must have a clear business rationale. Customers must always be accompanied by the inviting company's employee for all invitations issued as part of public relations.

What should I do?

- As a leader, ensure that your employees comply with the SO's gift policy.
- Ask yourself before accepting a gift or invitation how it might be perceived publicly, and decline any offers that might create a conflict of interest for you.
- Be transparent with your supervisor to avoid any suspicion.
- Decline invitations to high-profile events.
- If you accept an invitation, pay the associated travel and accommodation costs.
- Comply with the internal reporting procedure.

What should I not do?

- Accept or give gifts or benefits valued at more than the allowable fixed amount or receive gifts or benefits, regardless of the amount, at your home address.
- Solicit any form of gift or benefit for yourself or a third party.
- Receive any form of compensation, directly or indirectly, from a counterparty, intermediary, supplier or customer.
- Give or receive cash gifts.
- Offer or accept PR gifts or invitations that could damage the Group's image.

## 19. LOBBYING AND PARTY FINANCING

### DEFINITION

Lobbying or advocacy refers to any direct or indirect communication with public officials with the goal of influencing public decisions. Consulting stakeholders allows legislators to learn about how the law is enforced and how it can be improved. It also gives public decision makers greater insight into the expectations of civil society. Funding of political parties by legal entities (companies, foundations, etc.) is strictly prohibited.

### EUROFACTOR'S COMMITMENT

In collaboration with experts and practitioners from the Group's various sectors, lobbying enables Crédit Agricole to make a positive and significant contribution to public debates at international, European and national level on both political and technical issues. Its purpose is to provide an informed view of the impact of public decisions on the Group and to safeguard and/or promote its interests. The Group has set out its commitments in its Charter for Responsible Lobbying. In addition to fully complying with the ban on funding political parties, and doing so even in countries where the practice is permitted, the Group insists that all information about its employees' beliefs and political



engagements remain personal so as not to damage or jeopardize the Group's reputation. These activities must be conducted outside working hours and outside the Group.

What should I do?

- Transparently disclose your lobbying activities inside and outside the Group.
- Provide information about the mandates you hold in various professional associations.
- Base your arguments on reliable information that has been analyzed and reviewed at an internal level.
- Highlight the consequences for the various stakeholders.
- Report your public elective offices to your supervisor and compliance officer if there may be a connection to your employer or your work.
- Being careful not to define the group with your political opinions and actions. Decline any solicitation in any form that requires your political support and could make the group liable.

What should I not do?

- Engage in corruption or any unfair or abusive practices.
- Use the group's resources or funds to engage in fundraising or political support work.
- Give or accept gifts or benefits.
- Organize colloquia, events or meetings in which speakers' presentations involve payment of compensation in any form.
- Use information obtained from the government, an independent administrative agency or a public agency for business or promotional purposes.
- Sell copies of government, independent administrative or public agency documents to third parties, or use the stationery and logo of such public agencies and administrative bodies

Please note: It is advisable to observe all the above rules also in your relations with the direct environment of the relevant persons.

## 20. PATRONAGE AND CHARITY WORKS

### DEFINITION

Patronage allows companies to make donations to organizations in the form of financial or material support to promote a work of general interest or to acquire a cultural object. A charitable contribution is a grant or donation to an organization for a charitable purpose. It may be in the form of cash, in-kind contributions or services.

### EUROFACTOR'S COMMITMENT

Eurofactor may support charity work that contributes to the welfare of the population in the areas where the Group operates, but only in strict compliance with the Ethics Charter (examples: solidarity, culture, health, etc.). The contribution must comply with the principles of the Crédit Agricole Group's

Ethical Charter. Eurofactor may also make contributions in cash, kind or services in the event of natural disasters or other emergencies. Charitable contributions should never be used to disguise an improper advantage intended to influence decisions or to create such an appearance.

What should I do?

- Carefully select nonprofit organizations based on experience, credentials, and their reputation.
- Prefer nonprofit organizations whose financial statements are published and regularly audited.
- Select the project that has sufficient financial and human resources to meet its goals.
- Ensure that all contracts entered into with the organizations in question contain compliance clauses, and ensure that you can verify how these funds are being used.
- Ensure that all nonprofit expenditures are properly approved, accounted for and documented.

What should I not do?

- Make donations to individuals or commercial organizations.
- Fund work that indirectly benefits or is controlled by politicians, public officials or their relatives.
- Support organizations that could have a negative impact on the Society's reputation.
- Make cash payments.

## 21. SPONSORING DEFINITION

Sponsorship is a form of marketing in which the company covers all or part of the cost of a project or program in exchange for visibility on media platforms or events.

### DETAILS

The Society benefits from having its logos and brands showcased by the project or program in question, and from receiving special mention indicating that it has contributed to the funding. This may involve non-profit organizations and commercial companies.

### EUROFACTOR'S COMMITMENT

Sponsorship can be part of Eurofactor's marketing and communication strategy. Sponsorship must comply with the Group's principles and internal rules and must never be used in favor of undue advantage or unfair influence, or create the appearance of undue influence on decision-makers.

What should I do?

- Carefully select the sponsored organization based on its experience and reputation. Give preference to nonprofit organizations whose financial statements are published and regularly audited.
- Send a written request to management. If sponsored events or activities are controlled by politicians, public officials or their relatives, this must be stated in your application.

- Establish a contract with the sponsored organization that includes compliance clauses.
- Inform all stakeholders of the sponsorship.
- Transfer funds in multiple installments and ensure that each payment is properly used.
- Obtain and retain receipts for all expenses and income made under sponsorship and record them according to accounting rules.

What should I not do?

- Sponsor an organization proposed by a public official.
- Sponsor an organization that indirectly benefits or is controlled by politicians, public officials or their relatives.
- Sponsor an organization that participates in projects in which E

## PROTECTION AND REPUTATION OF THE GROUP

### 22. CONFIDENTIALITY

#### DEFINITION

#### DETAILS

All data concerning clients, as well as Eurofactor, the other companies of the Group (its employees, its clients and its internal organization), its IT systems, its security procedures, its suppliers and its subcontractors are confidential.

Disclosure of confidential information will render the company and the employee involved liable. If the information is non-public data of a publicly traded company, a breach of confidentiality may result in criminal, administrative and professional penalties.

Confidentiality agreements cover all types and forms of customer data. Such data may not be disclosed outside the Company, and may not be disclosed within the Group to persons who do not need access to it in order to perform their duties.

#### EUROFACTOR'S COMMITMENT

Eurofactor ensures confidentiality in all circumstances, which applies to all types of data carriers. All Eurofactor employees are custodians of and responsible for the confidential data they receive. Employees may use this data internally for professional purposes and disclose it outside the company only when authorized to do so or as provided by law.

Eurofactor employees must also apply the principle of confidentiality with the utmost care when using social media. They are responsible for everything they publish on the Internet about the Group and must ensure that they do not disseminate information via the Internet that they would not otherwise disclose about Eurofactor. This principle of confidentiality also applies to business social networks.

What should I do?

- Respect the strict confidentiality of the data to which you have access and which concern Eurofactor's customers and, more generally, the Group.
- Always obtain the customer's express written authorization if you need to disclose confidential information concerning him or her.
- Disclose confidential information only within Eurofactor and the Group to the authorized persons and only for the purposes of their activities.
- Refer to the high level of confidentiality of e-mail messages containing sensitive data to be protected.
- Always ensure that a confidentiality agreement is in place before sharing confidential data with an external service provider.
- Protect confidential data from unauthorized use and access.
- If you have any doubts about the data you want to distribute via social media, ask your supervisor or compliance officer beforehand.

What should I not do?

- Disclose data about the Group's customers or the Crédit Agricole Group to third parties.
- Send confidential information to your home email address or an online personal data storage service.
- Post any data that could harm customers, your company, your function or the Crédit Agricole Group on social or other media.

## 23. FIGHT AGAINST MONEY LAUNDERING AND FINANCING OF TERRORISM

### DEFINITION

Money laundering and terrorist financing are phenomena of unprecedented proportions. They harm our society in general and the economic development of entire countries. These practices allow criminals to infiltrate financial institutions, control certain sectors of the economy and corrupt administrative bodies and governments, influence the lives of citizens, and curtail key principles such as democracy.

### DETAILS

Money laundering is a process aimed at making money obtained through illegal or criminal means appear clean. The "laundering" of illegal funds is also used to finance terrorism. Terrorism can also be financed from legal funds used to carry out a terrorist operation. This is referred to as "reverse money laundering."

## EUROFACTOR'S COMMITMENT

Eurofactor is involved in the fight against money laundering and terrorist financing. Thus, the company monitors financial flows in accordance with the legal provisions on the protection of privacy and fundamental rights and freedoms of individuals, as well as on the fight against discrimination and professional secrecy. All employees must participate in constant vigilance at their own level. Any breach of duty exposes directors, officers and employees to civil, criminal, administrative and disciplinary liability. In addition, Eurofactor's image and reputation are at stake.

What should I do?

- Make sure you are kept up to date on these issues, even if you are not directly affected.
- As a manager, do your best to ensure that your employees are well informed about these issues.
- Actively implement procedures to combat money laundering and terrorist financing.
- Take special care to know as much as possible about your customers when they open an account and throughout the business relationship.
- Remain vigilant at all times, looking for unusual, atypical or complex transactions that have no obvious business justification and could clearly be illegal.
- Ask customers to provide a reasoned explanation for their transactions.
- Refuse to conduct transactions that lack economic justification or where there is doubt about the identity of the principals or beneficiaries.
- Refer all suspicious transactions to the Compliance Department.

What should I not do?

- Refrain from applying procedures strictly, such as for business reasons.
- Tell customers that they are suspected of money laundering or share this information with third parties.
- Conduct, advise or assist in any investment, concealment or consolidation of transactions.

## 24. FIGHT AGAINST TAX EVASION

### DEFINITION

For example, tax evasion consists of avoiding or reducing taxes by declaring taxable assets or taxable profits in a country that is different from the country in which they should be declared. Tax evasion affects both companies and individuals who fail to declare their taxes. In a broader sense, tax evasion involves the use of various legally permissible means to reduce one's tax burden. This differs from tax fraud, which is an illegal practice.

## DETAILS

Two tax measures with which Eurofactor must comply have been introduced 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 of U.S. taxpayers ("U.S. persons") living outside the United States.
- AEOI was an OECD initiative to conduct a multilateral exchange of information to identify the assets of tax residents living outside their home country.

## EUROFACTOR'S COMMITMENT

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

Eurofactor undertakes not to establish or propose business activities solely for tax purposes or to assist its clients in avoiding their tax obligations or in doing business in countries or territories whose jurisdictions are classified by the EU as "non-cooperative" (tax havens) or which do not participate in the automatic exchange of information.

### What should I do?

- Comply with the laws and regulations applicable in the states and territories in which we conduct our activities.
- Request approval from the Group Tax Department, Group Public Affairs Department and Group Compliance Department before investing in a non-cooperative foreign state or territory.
- Ensure that you closely monitor, identify and promptly report to the Compliance Officer any actions directly or indirectly aimed at evading tax regulations.
- Keep your client files updated with information on the tax residency (AEOI) and citizenship criterion (FATCA) of your clients regarding their deposit activity.
- In case of doubt, contact your FATCA/CRS Officer.

### What should I not do?

- Deliberately shield Eurofactor from its tax obligations.
- Advise a client and/or participate in financial strategies to avoid tax regulations.
- Sign any self-certifications on behalf of your clients.
- Remove or conceal any data to cover up evidence that a transaction is linked to a tax haven.

## 25. INTERNATIONAL SANCTIONS

### DEFINITION

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

### DETAILS

Most of the international sanctions applicable at the level of Eurofactor and the Crédit Agricole Group as a whole are issued, administered or enforced by the UN Security Council, the European Union, France and the United States, as well as by the competent local authorities of the countries in which the Group operates.

### EUROFACTOR'S COMMITMENT

Eurofactor is committed to ensuring strict compliance with international sanctions, which can be complex and of extraterritorial scope. Compliance with these requirements is ensured by strengthening internal procedures and programs that ensure compliance with international sanctions. These apply to all Eurofactor employees and extend beyond pure financial services. Eurofactor does not tolerate any violation of international sanctions.

#### What should I do?

- Become well acquainted with, understand and follow the Group's internal policies and procedures.
- Complete the annual training sessions which are mandatory for all employees.
- Ensure that you report to the Eurofactor Sanctions Officer any violation or attempted violation of international sanctions, as well as any action taken directly or indirectly to circumvent them.
- Keep your customer data current and complete; Monitor compliance of operations with international sanctions.
- Contact your Sanctions Officer if in doubt.

#### What should I not do?

- Participate in financial transactions that do not justify their complexity.
- Remove or conceal any data to cover up evidence of a transaction with countries or individuals subject to international sanctions.
- Modify tools or IT processes to remove information useful for identifying the risk of international sanctions.
- Advise a client and/or engage in financial stratagems to circumvent international sanctions.

## 26. FRAUD PREVENTION

### DEFINITION

Fraud is an intentional act committed for the purpose of obtaining a material or immaterial benefit to the detriment of a third person or organization. In the case of a violation of laws, regulations or internal rules, fraud is characterized by the violation of the rights of others and the total or partial concealment of an operation, a series of operations or their characteristics.

### DETAILS

There are two types of fraud, depending on the origin of the malicious parties involved:

- External fraud: an act carried out by individuals (e.g., customers), alone or in a group, to obtain funds, documents or information that they can use for their own benefit and to the detriment of a company, its customers or third parties.
- Internal fraud: a malicious act committed by an employee to the detriment of his or her company or the interests of third parties managed by the company. Fraud may also be characterized by a malicious act performed by an employee with the cooperation of persons outside the company. This is referred to as mixed fraud.

### EUROFACTOR'S COMMITMENT

Eurofactor places great emphasis on fraud prevention, using a growing number of techniques that are becoming increasingly sophisticated, especially in light of digital transformation. To combat the rise in fraud, it is essential to tackle the problem at both the upstream and downstream levels. All employees play an important role in combating fraud, regardless of their duties. Thanks to the daily vigilance of all Group employees, we are able to prevent and detect fraud attempts.

#### What should I do?

- Be fully familiar with fraud prevention laws and best practices and apply them responsibly and with constant vigilance.
- If you suspect or have doubts about fraud, immediately notify your supervisor and the ssH team in the Financial Security unit so they can act quickly.
- If you have any doubt about the identity of the sender of an email, forward the email to your IT contact.
- As a leader, assess the risk of fraud associated with your activities, and enforce the Principles of Good Conduct and the General Rules of Professional Conduct.
- Conduct a fraud risk analysis at the beginning of the development process for all new products and activities.
- Respect the principle of segregation of duties so that those performing an operation cannot approve or complete it.

#### What should I not do?

- Communicate your passwords to third parties, lend your access badge, or leave confidential information or documents on your desk.



- Open emails or attachments from an unknown sender.
- Discuss in public places sensitive topics that could concern the Crédit Agricole Group.
- Use external data carriers (external hard drives or USB sticks) without taking precautions.

## 27. PREVENTION OF MARKET ABUSE

### DEFINITION

Insider trading, price manipulation and the dissemination of false or misleading information are examples of market abuse. Combating market abuse means preserving the integrity and transparency of the markets and public confidence. Therefore, it is everyone's responsibility to respect the principle of equality of information among investors. In case of violation of these rules, the investment service provider and the natural persons subordinated to it risk disciplinary and financial penalties, as well as civil and criminal prosecution.

### DETAILS

If confidential information about a listed company is made public, such "inside information" may affect the market price of the relevant financial instruments or related financial instruments. Confidential information may also be communicated in writing or orally or simply inferred. The use, transmission and recommendation of such information for one's own account or for the account of others constitutes insider trading and is therefore strictly prohibited and severely sanctioned.

### EUROFACTOR'S COMMITMENT

Eurofactor has implemented a system of information barriers to protect against insider information. These provisions mean that persons who come into possession of insider information must comply with the mechanism established in their company for the management of insider information. The barriers also ensure strict control of exchanges between people who have access to insider information by virtue of their function and those who do not. In particular, this includes the physical separation of persons performing sensitive activities or functions from other employees.

What should I do?

- Be alert and take all necessary measures to avoid the disclosure of insider information. This means complying with existing information barriers.
- If you are on an insider list, comply with the associated abstention obligations.
- If you believe you are in possession of inside information, contact your supervisor, who will inform the Compliance Officer.
- Immediately report any transaction suspected of market abuse to the Compliance Department, which, after analysis, will decide whether it is appropriate to report the transaction to the Financial Market Authority.
- Maintain the confidentiality of all suspicious transaction statements and thus not communicate with persons suspected of having committed market abuse, whether proven or not.

What should I not do?

- Use inside information when acquiring or transferring financial instruments, contracts or securities to which such information relates, whether for your own account or on behalf of Eurofactor or a third party.
- Disclose inside information, except as part of your regular duties, to third parties, to persons outside Eurofactor or to employees who are not authorized to access such information.
- Recommend to third parties (employees of the same or another company in the Group, external third parties, etc.) to take positions on securities on the basis of inside information.

## 28. USE OF 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 lives and affect all Eurofactor employees, both personally and professionally. However, they carry 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.

### EUROFACTOR'S COMMITMENT

It is Eurofactor's strategy to be present on many of these social media networks (Twitter, Facebook, LinkedIn, etc.) so that it can interact with clients and stakeholders and respond to their requests, while learning what is being written about the Group and its services. Except in cases of abuse, all Eurofactor employees have a right to freedom of expression inside and outside the company. However, all employees are expected to act responsibly by behaving appropriately and following best practices. Employees are allowed to use the social networks at their workplace for private purposes, provided they do not abuse this privilege, but only make use of it on a case-by-case basis and in an appropriate manner, without exercising their right to freedom of expression to the detriment of the company, its directors and officers, or work colleagues.

What should I do?

- Follow the rules of confidentiality to which you are bound by virtue of your profession.
- Follow the general terms and conditions that state how your personal data and the information you put online can be used.
- Be especially mindful of social media whose servers are hosted in countries whose personal data protection rules may differ from those in Germany.
- Checking your settings to ensure the confidentiality of your profile and comments.
- Indicate that your comments are your sole responsibility and reflect only your personal opinion.

- Not to intervene directly if you read negative or defamatory comments about the group, so as not to give more visibility to the authors. If you come across such comments, forward them to Corporate Communications.
- If you have doubts about the nature of the information, do nothing and involve your supervisor.

#### What should I not do?

- Conduct your business on social media without obtaining approval from your supervisor or conducting a risk analysis.
- Make official comments on behalf of Eurofactor if you are not a spokesperson appointed by Corporate Communications.
- Making any comments that could harm your position or Eurofactor and its employees.
- Make comments such as malicious criticism or insults or remarks of a derogatory, defamatory or indiscreet nature or disclose confidential information.
- Use information protected by Eurofactor's copyright without prior written consent from the relevant department or otherwise from Corporate Communications.