

Alert Processing
Governance
Procedure

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I. Background and objectives

Covéa Finance is committed to upholding the best standards and practices in ethics and professional conduct. This procedure contributes to this and governs the functioning of its system for receiving and managing reports and alerts, thus meeting the requirements of:

- “Sapin 2” Law No. 2016-1691 of 9 December 2016 on transparency, the fight against corruption, and the modernisation of economic life¹;
- Law No. 2017-399 of 27 March 2017 on the duty of vigilance of parent companies and instructing undertakings;
- The “Waserman” Law No. 2022-401 of 21 March 2022 aimed at improving whistleblower protection;
- Decree No. 2022-1284 of 3 October 2022 relating to the procedures for collecting and processing whistleblower reports and establishing the list of external authorities instituted by the Waserman Law.

The system described in this procedure governs the receipt, categorisation, and processing of reports and alerts (*see Appendix 1*). Based on the principle of good faith, it ensures:

- The protection and anonymity, where applicable, of the identity of whistleblowers; and
- The protection of personal data and information transmitted for this purpose.

The Covéa Finance whistleblowing system, of which the alert tool is an integral part, is open to all natural persons whether they are:

- An employee (permanent, temporary, or occasional); or
- A natural person who has applied for employment at Covéa Finance; or
- A third party to the company (for example, an employee of a supplier or customer – Cf. Appendix 2).

¹ Articles 6 *et seq.* and Article 17-II of the “Sapin 2” Law No. 2016-1691 of 9 December 2016;

The **IntegrityLine** alert tool configured for Covéa Finance (“tool” or “alert tool”) is open and available on the public website <https://coveafinance.integrityline.com>.

This encrypted and password-protected tool makes it possible, in particular, to guarantee the confidentiality of exchanges with the whistleblower and, if they wish, their anonymity.

It is also possible to send a report outside this system:

- By reporting to their line manager;
- After making an internal report under the conditions set out in this procedure; or
- Directly with the authorities listed in Appendix 4.

II. Scope of the system

1. Facts within the scope of the system

The facts within the scope of this whistleblowing system relate to any act, conduct, or situation that may violate the laws and regulations in force and/or Covéa Finance’s rules of conduct and compliance, namely:

- Any crime or offence (including, in particular, acts of corruption and influence peddling).
- Any serious or manifest breach of:
 - An international commitment duly ratified or approved by France;
 - A unilateral act of an international organisation made on the basis of such a commitment;
 - Applicable laws or regulations.
- Any threat or harm to the public interest.
- Any act, conduct, or situation that may harm the image and/or interests of Covéa Finance, its shareholder, and/or its business partners (in particular, its suppliers, customers, etc.).

- Any act, conduct, or situation in contradiction with the “internal rules” and the Covéa Finance “Professional Conduct Commitment” or “Policy for the Prevention and Management of Conflicts of Interest and Code of Professional Conduct” appendices.

These facts are reported when the information was obtained in the course of the reporting person’s professional activity unless this person had personal knowledge of it.

Any report issued through the alert tool but not within the scope of the alert system and therefore not admissible will be transferred to the departments concerned (e.g. customer complaints unrelated to facts likely to fall within the scope of the whistleblowing system) or classified for no further action.

The reporting person will be informed of why the entity believes, where applicable, that the report does not meet the conditions.

Note: Facts, information, or documents, regardless of their form or medium, covered by national defence secrecy, medical confidentiality, or the confidentiality of the relationship between a lawyer and their client are excluded from this whistleblowing system.

2. People who can report²

The reporting person (see Appendix 2) is a natural person who is:

- An employee (permanent, temporary, or occasional) of Covéa Finance, including those whose employment relationship has ended; or
- A candidate for employment with Covéa Finance; or
- A third party to Covéa Finance (for example, an employee of a supplier or customer).

² See Article 8(I)(A) of the Sapin 2 Law

The whistleblower must meet the following cumulative conditions to be considered a whistleblower and entitled to the related protection:

- **Act in good faith:** The whistleblower factually reports concrete acts, conduct, or situations without seeking to harm others and may be required to substantiate their report with documentary evidence;
- **Make a report without direct financial compensation;**
- Report an event within the scope of the system. They must have **obtained information about the acts, conduct, or situations that are the subject of their report in the course of their professional activity unless they had personal knowledge of them:** they do not report any information that they know only through a third party.

The reporting person granted whistleblower status is entitled to:

- Confidentiality guarantees: the whistleblower may either retain their anonymity or decide to disclose their identity;
- Criminal protection;
 - Identifying information is confidential, and its disclosure is a punishable offence³;
 - Any person seeking to prevent the whistleblower from issuing this alert is liable to criminal prosecution⁴;
- Protection under labour law: the whistleblower is protected against any direct or indirect discriminatory measures (e.g. in terms of salary increases or professional development), any disciplinary measure, or any retaliation based on their alert, made in accordance with this procedure.

A whistleblower who feels that they have been punished for issuing an alert may inform the Legal and Compliance Officer or, failing that, Senior Management by any means.

³ 2 years' imprisonment and €30,000 fine

⁴ 1 year's imprisonment and €15,000 fine

The whistleblower's protective status is subject to compliance with the reporting procedure. In the event of abusive or bad-faith report, the whistleblower could face disciplinary measures and/or legal proceedings, where appropriate.

3. Person implicated by the report

The person implicated by the report or alert is presumed innocent until the facts are established and their responsibility is established in the conclusions drafted by the Investigation Committee, validated by the Ethics Committee, and presented to Senior Management.

In the event of an admissible alert involving significant risk and/or imminent danger to the whistleblower, the Ethics Committee is authorised to take any precautionary measure against the person implicated by the alert.

The person implicated by an alert is informed by the Ethics Committee of the subject of the alert and the use and recording of their personal data within a period not exceeding 1 month after the alert is issued⁵. The person implicated by the alert has a right to access, rectify (provided that the data concerning them is inaccurate, incomplete, ambiguous, or out of date), and oppose the use of their personal data.

However, the notification of the person implicated by the alert may be delayed if it could "seriously compromise the achievement of the objectives of the processing"⁶. If the alert led to disciplinary or judicial proceedings, the implicated person may obtain this information. The person implicated by an alert may not obtain information about the whistleblower's identity.

⁵ CNIL reference framework on processing personal data for the implementation of a whistleblowing system

⁶ Article 14-5-b) of the General Data Protection Regulation

4. Recipients of reports

The alert tool does not replace other existing channels as provided by law according to:

- Direct recourse to the judicial or administrative authorities listed in Appendix 4;
- The staged escalation procedure (see Appendix 3): in particular, the reporting person may bring any act, conduct, or situation that could be the subject of a professional alert to the attention of their line manager, the Compliance & Internal Control Officer, human resources, or employee representative bodies.

In the event of recourse to the staged escalation procedure, these parties advise and direct the reporting person to the alert tool made available by Covéa Finance when they consider that the acts, conduct, or situations covered by the report fall within the scope of this system.

The Ethics Committee (see Appendix 2) receives the reports made through the alert tool, meets without delay to analyse their admissibility, and categorises them, where appropriate, to entrust them to the appropriate Investigation Committee according to the subject of the alert (see Appendix 5). The Investigation Committee must have the appropriate powers to address the allegations brought to their attention. For this purpose, it can be joined by third parties who can contribute their experience. These third parties are subject to the same confidentiality agreements as the permanent members of the Ethics Committee and the Investigation Committees (*see VI*).

In any event, members of the Ethics Committee or the Investigation Committee must:

- Be independent, i.e. not in a situation of real or perceived conflict of interest with the persons/departments involved in the allegation(s);
- Sign a confidentiality agreement (*see VI*);
- Have the appropriate technical and human resources to fulfil their mission.

If one of the permanent or temporary members of the Ethics Committee or the Investigation Committee is involved in the allegations and/or in a situation of real or perceived conflict of

interest, the Senior Management, made up of the Directors in charge of the various activities of Covéa Finance:

- Relieves the person in question; and
- Determines the person in charge of taking over the mission of the relieved person, with the obligation to sign a confidentiality agreement beforehand (see VI 6).

III. Receipt and categorisation of reports and alerts

1. Receipt of a report

In their report, the whistleblower must remain factual and as objective as possible to allow the Ethics Committee to examine it as well as possible. To this end, they must, in particular:

- Identify where the events occurred;
- Specify when the events occurred or that they are in progress;
- Identify the person(s) involved;
- Describe the reported facts according to their understanding (a legal qualification is unnecessary).

The whistleblower may also attach supporting documents to their report via the alert tool either:

- When making the report; or
- After the fact.

When making their report in the alert tool, the whistleblower pre-qualifies the subject of their alert using a dropdown list. This constitutes preliminary screening as to the report's relevance relative to the acts, conduct, and reports included in the scope of this system.

For each report, the alert tool confirms the recording of the alert to the whistleblower by sending a dated acknowledgement of receipt without delay. _____

2. Categorisation of a report

The Ethics Committee has 90 calendar days from receipt of the report made via the alert tool to analyse it and decide on its admissibility:

- If the report is considered inadmissible, the reporting person is informed via the alert tool's messaging system. No further action will be taken following the investigation of the report;
- If the report is considered admissible, i.e. contains serious evidence of unlawful or unethical behaviour:
 - The reporting person is informed via the alert tool's messaging system;
 - The person implicated by the report is informed of the existence of the investigation procedure unless this could compromise the investigation;
 - The Ethics Committee categorises the alert according to its area (*see Appendix 1*) and entrusts the investigation to the appropriate Investigation Committee (*see Appendix 1*).

As an exception, the admissibility of reports relating to the person's protection (*see Appendix 1*) is analysed without delay by the Ethics Committee to decide on its admissibility.

IV. Processing and closure of the alert

1. Processing of the alert

During its investigation, the Investigation Committee may contact the whistleblower through the secure messaging system of the alert tool to obtain additional information about the report, including whether the alert was made anonymously.

The alert processing time depends on its subject (*see Appendix 4*):

- Alerts relating to the person's protection are processed without delay;

- Other alerts within the scope of this system are processed within a reasonable period of 90 calendar days from the acknowledgement of receipt of the report.

2. Closure of the alert

At the end of its investigations, the Investigation Committee presents its conclusions to the Ethics Committee to close the investigation (either it is classified for no further action, or the case is forwarded to Senior Management and, where appropriate, to the departments concerned to take the necessary measures: disciplinary measures, etc.). It has 90 calendar days to do so for alerts other than those relating to the person's protection. If this time limit is exceeded, the Ethics Committee will keep the whistleblower informed via the alert tool.

The conclusions presented in the form of a report:

- Are impartial and contain factual findings (neither incriminating nor exculpatory);
- Are clear and do not contain anything that can be considered an opinion or judgement.

The Ethics Committee validates the Investigation Committee's conclusions and informs Senior Management. Where appropriate, along with the departments concerned, Senior Management takes the necessary measures to put an end to the conflict and defend Covéa Finance's interests (e.g. disciplinary measures, etc.).

In case of disagreement between members of the Ethics Committee and/or between the Committee and the Investigation Committee, Senior Management is authorised to arbitrate on the subject of the disagreement.

The Ethics Committee informs the whistleblower and the implicated person of the closure of the alert and its conclusions.

V. Protection of personal data, archiving, and reporting

1. Protection of personal data

In keeping with the European Data Protection Regulation (“GDPR”), the CNIL⁷ requires all personal data collected during the processing of an alert to be retained throughout the procedure. Where disciplinary or legal proceedings are initiated, the collected personal data is retained until the end of the proceedings, subject to the applicable limitation period.

2. Archiving

The documentation relating to the investigation is securely archived, and access to this information is limited to persons authorised to consult it. The archiving procedures and durations comply with the applicable regulations.

- Archiving of inadmissible reports

Where a report is considered inadmissible, the report data is anonymised and stored for six years in the alert tool with restricted access.

- Archiving of alerts closed after investigation

Where an alert is classified for no further action after an investigation, the data relating to this alert is anonymised within two months of the close of the verification operations and stored for six years in the alert tool with restricted access.

- Archiving of admissible alerts not resulting in disciplinary or judicial measures

⁷ The Commission nationale de l’informatique et des libertés [French data regulator] (CNIL)

Where an alert is considered admissible, but no action is taken following the investigation, the data relating to the alert are anonymised as soon as possible and stored for six years in the alert tool with restricted access.

- Archiving of admissible alerts resulting in measures

Where disciplinary or judicial proceedings follow an alert, the data relating to this alert remain intact and available in the alert tool until the proceedings end or the appeals against the decision are time-barred. The data are then anonymised.

3. Reporting to Covéa Finance's Senior Management

Each year, the Ethics Committee reports to Senior Management on the operation of the whistleblowing system, including:

- The number of reports received and the number of alerts processed and closed;
- The types of alerts (i.e. protection of the person or economic and financial);
- The processing times for reports and alerts.

Reports are also provided to the Covéa group according to the approved procedures.

VI. Protection of personal data, archiving, and reporting

Those responsible for collecting, processing, and closing alerts sign a specific confidentiality agreement and receive appropriate training.

Other persons who may be included in the Ethics Committee or the Investigation Committee from time to time also sign a confidentiality agreement. Their involvement must be legitimate and proportionate to what is strictly necessary to handle the alert.

The confidentiality agreement is an addendum to the employment contract kept in the employee's HR file.

VII. Appendices

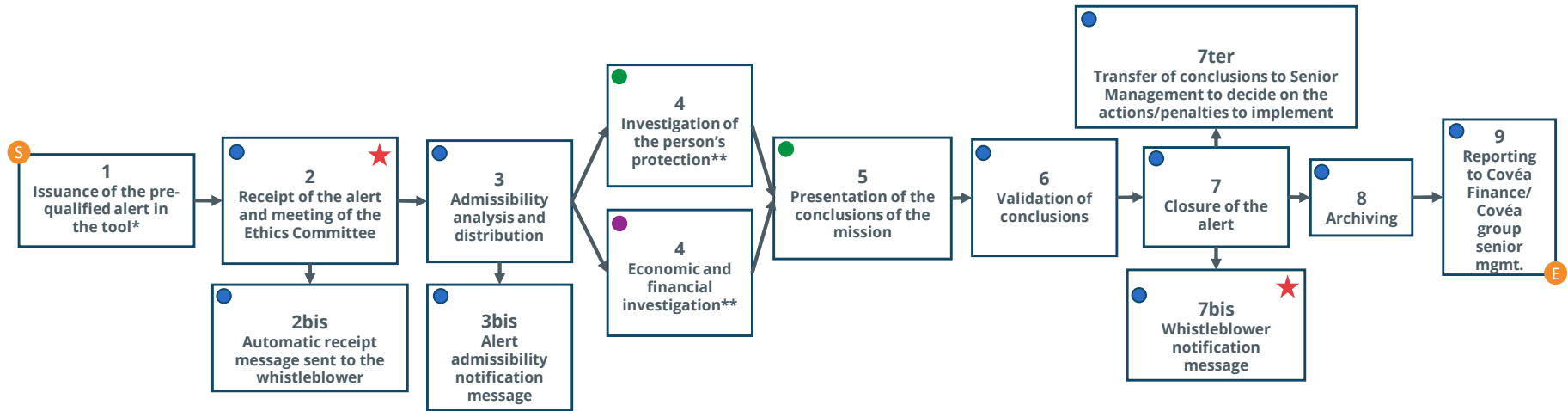
Appendix 1:

Following the interviews conducted with the business line contributors, the various proposed parties involved in handling an alert are:

- *Ethics Committee**: Compliance & Internal Control Officer, Head of Legal and Compliance, and DPO
- *Investigation Committee*:
 - *Protection of the person**: Human Resources Manager – Employee Representative
 - *Economic and financial**: Compliance & Internal Control Officer, Head of Legal and Compliance

See diagram below

Appendix 1 (continued):



Legend:

- S Start of the process
- Ethics Committee
- ★ Stage of the process allowing anonymity to be maintained
- E End of the process
- Protection of the Person Investigation Committee
- Economic and Financial Investigation Committee

*: The alert tool is not a substitute for other ways of issuing alerts (manager, employee representative body, administrative and/or judicial authority, etc.), which serve as means to filter employee reports. Moreover, the reporting person chooses the subject relating to the alert from a predefined dropdown menu, which constitutes a type of preliminary filtering in relation to the relevance of the alert in terms of actions, behaviour, and reports within the scope of application of this tool.

** In case of disagreement between members of the Ethics Committee and/or the Investigation Committee, Senior Management is authorised to arbitrate on the subject of the disagreement.

** Alerts relating to protecting an individual are to be handled immediately due to their urgent nature, unlike Economic and Financial alerts.

Appendix 2:

Parties involved in the whistleblowing system	Nature of the parties
Reporting person	<p>Any individual making a report, whether they are a:</p> <ul style="list-style-type: none"> • Shareholder or holder of voting rights in the general meeting; • Member of the administrative, management, or supervisory body; • Covéa Finance employee (permanent, temporary, or occasional); • Third party to Covéa Finance (e.g. an employee of a supplier or customer).
Whistleblower	Any reporting person meeting the conditions for whistleblower status and therefore entitled to the protection afforded to them.
Person implicated by the alert	Individual implicated by the report and presumed innocent until the facts are established.
Ethics Committee	<p>The Ethics Committee is responsible for analysing the admissibility of reports and leading the investigation by the Investigation Committee of the alerts that it has deemed admissible. The results of the Investigation Committee's discussions are presented to them to close the alert.</p> <p>Its permanent members include:</p> <ul style="list-style-type: none"> • Head of Compliance; and • Head of Permanent Internal Control & Ethics; and • Head of Human Resources.
Investigation Committee	<p>The Committee is responsible for investigating alerts deemed admissible by the Ethics Committee. It presents its conclusions to the Ethics Committee to close the alert.</p> <p>Composed based on the categorisation of the alert, its permanent members are:</p> <ul style="list-style-type: none"> • Barring unforeseen circumstances, for alerts related to the person's protection: <ul style="list-style-type: none"> ○ Head of Human Resources; ○ Employee Representative. • Barring unforeseen circumstances, for economic and financial alerts: <ul style="list-style-type: none"> ○ Head of Compliance; and ○ The Head of Permanent Internal Control & Ethics. <p>The Investigation Committee may be joined by other employees who contribute their expertise depending on the needs of the investigation.</p>
Covéa Finance's Senior Management	<p>The Ethics Committee is accountable to Senior Management for ensuring that the whistleblowing system functions properly.</p> <p>Senior Management is informed of the conclusions of all investigations concerning alerts and settles any disagreements between the Ethics Committee members or between the Ethics Committee and the Investigation Committee. Where appropriate, along with the departments concerned, it takes the necessary measures to put an end to the conflict and defend the company's interests (disciplinary measures, etc.).</p>

Appendix 3:

A three-phase staged escalation procedure is available to the reporting person:

- Level 1: the whistleblower must contact their direct or indirect line manager, the Compliance & Internal Control Officer, the human resources department, or the employee representative bodies and/or submit an alert through the alert tool;
- Level 2: in the absence of “due diligence (...) within a reasonable time”, the whistleblower has the option of escalating to the administrative or judicial authority, the Rights Advocate (*Défenseur des droits*), or the professional bodies;
- Level 3: as a last resort, the alert may be made public through communication to the media by its reporting person

Appendix 4:

Alternatively, in the event of serious or imminent danger, the alert may be addressed directly to one of the following authorities:

- a. AMF (French Financial Markets Authority) in the event of a breach of the regulations governing financial or banking activities;
- b. ACPR (French Prudential Control and Resolution Authority) in the event of a breach of the regulations governing insurance or banking activities
- c. IGEDD (French General Inspectorate for the Environment and Sustainable Development);
- d. CNIL (French Data Regulator);
- e. ANSSI (French Network and Information Security Agency);
- f. AFA (French Anti-Corruption Agency) in the event of breaches of the duty of integrity demonstrating a failure of the compliance system;
- g. DGT (French Directorate-General for Labour);
- h. DGFEP (General Delegation for Employment);
- i. The Judicial Authority (in the event of serious or imminent danger);
- j. An EU institution, body, or agency competent to collect information on violations within the scope of the directive⁸;
- k. The Rights Advocate, who directs the reporting person to the authority or authorities best able to deal with the matter;

⁸ Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches

Appendix 5⁹:

Alerts for the “Protection of the Person” Investigation Committee	Alerts for the “Economic and Financial” Investigation Committee
<ul style="list-style-type: none"> • Health • Safety (all types of harassment) • Working conditions • Violation of fundamental human rights 	<ul style="list-style-type: none"> • Bribery • Conflict of interest • Gift giving • Internal fraud: abuse or misappropriation of company assets • Financial irregularity • Harm to the environment • Serious harm or threat to the public interest

⁹ Non-exhaustive list

Appendix 6:

Summary of the main time limits applicable to use of the internal alert tool

REPORT MANAGEMENT STEPS	APPLICABLE TIME LIMIT
Acknowledgement of receipt of the report	Immediately and in any case within 7 working days
Meeting of the Ethics Committee	Immediately
Notification of the person implicated by the alert about the subject of the alert and the use and recording of their personal data	1 month after the alert is issued
Closure of the alert	<ul style="list-style-type: none"> - 90 days - Notification of the reporting person if this time limit is exceeded
Analysis of the report on the protection of the person and admissibility	Immediately

Legal notices:

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