



CODE OF ETHICS

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PREAMBLE

This Charter forms part of the Saretec Group's Mission.

Our mission, "We work for a safer world for all," cannot be realized without a strong foundation of trust and shared responsibility. Trust is the cornerstone of all our relationships—whether internal, between managers and employees, or external, with our clients, partners, and all stakeholders. This trust is built and maintained through a clear and widely respected ethical framework.

To ensure consistency and effectiveness in our actions, it is essential that every member of the Group, at every level of responsibility, adheres to this ethical Charter. This is not only an internal framework: it is a shared guide that extends to all stakeholders. It reflects the values we uphold and the principles that guide our decisions. By working together, we can fully achieve our mission.

This approach is in accordance with France's Sapin II Law of December 9, 2016 on transparency, anti-corruption, and modernization of the economy. It reflects Saretec Group's desire to go beyond legal and regulatory requirements by affirming our commitment to act with integrity and fairness in all our activities.

Saretec Group is committed to guaranteeing impeccable service to its clients in terms of professional ethics and promoting ethical behavior both within the organization and toward external actors. By formalizing these ambitions, this Charter clarifies the guiding principles and expected behaviors of our employees as well as all stakeholders of the company.

The main objective of this Charter is to prevent any ethical breaches—whether social or environmental—and to ensure the integrity of Saretec professions. This includes combating any form of illicit behavior as well as promoting a high standard of professionalism inherent in our sector.

As a key player in insurance expertise, prevention, claims management, post-loss repair, and mobility, the Group recognizes the importance of integrity, impartiality, and objectivity in executing its missions.

This Charter establishes a clear ethical framework that applies to all employees to ensure professional, independent, and competent practice. It emphasizes the importance of transparency and professionalism in all operations conducted by the Group, with constant respect for ethical principles. Saretec reaffirms its commitment to embedding these values at the heart of its decisions and operations, ensuring that each action is guided by strong ethics.



GENERAL PROVISIONS

1.1 Scope of the Charter

This Charter, which outlines our ethical commitments, applies to all stakeholders of the Saretec Group. It is a reference document for all partners and clients working with Saretec.

We commit to adhering to the principles and obligations set forth in order to guarantee ethical, responsible conduct that complies with current laws and regulations.

This Charter applies to all our business partners connected to Saretec, including clients, suppliers, service providers, and subcontractors. We expect all parties to apply these principles in their business relationships. These principles apply throughout the value chain.

All our existing and future companies must apply the principles and rules described in this document. Their executive teams are responsible for embedding this ethical policy into their governance.

Our employees must comply with the Charter and its recommendations, regardless of their hierarchical level. They are required to understand and apply its content during the execution of their duties. These obligations remain in effect even after their departure from the Group.

These commitments extend to all our activities, regardless of the sector or geographic location. Any violation of the Charter may result in appropriate measures.

1.2 Group Commitment

Since its inception, Saretec has been committed to generating a positive impact on society and the environment. In 2023, this ambition was formalized through its status as a “mission-driven company,” built around the following purpose:

“We work for a safer world for all, by preventing and resolving claims and crises with genuine care for others and by innovating to help our clients make their activities more sustainable.”

Our purpose is based on four statutory strategic objectives, each of which gives rise to operational goals that integrate social and environmental concerns into the Group's pursuit of performance.

Role of Governance Bodies

Members of our governance bodies embody Saretec's values and act with integrity and exemplarity. They are subject to the same rules as our employees and external stakeholders.

More specifically, the Board of Directors is responsible for acting in the Group's best interest and considering its social, environmental, and ethical responsibilities as well as its stated purpose.

In defining the Group's strategic orientations and goals, it integrates ethical principles into decision-making. It is the board's duty to ensure these principles are included in Group policies.

Likewise, the Group Executive Committee incorporates these ethical commitments into the implementation of Saretec's policies and ensures compliance. The same applies to the executive management of all subsidiaries.

In general, national directors consider Saretec's values when implementing the Group's operational strategy.

Adherence to the United Nations Global Compact

Since 2001, we have been signatories of the UN Global Compact.

This international network brings together companies committed to ten principles on human rights, labor, environment, and anti-corruption, and to working actively in their favor.

Through this commitment, we pledge to advance in implementing these principles and to report annually on the progress made.

Accordingly, our employees must respect the fundamental principles and rights enshrined in the Universal Declaration of Human Rights, the Charter of Fundamental Rights of the European Union, ILO conventions, OECD Guidelines, and the United Nations Convention Against Corruption.

Commitment to the Responsible Supplier Relations Charter

Since 2023, we have adhered to the Responsible Supplier Relations Charter, which reflects our

commitment to balanced, ethical, and sustainable relationships with partners.

This charter promotes responsible practices between companies and suppliers, based on 10 commitments to uphold fundamental rights, foster balanced and transparent relations, and build sustainable partnerships.

Through this adherence, we reinforce our corporate social responsibility and uphold our mission through ethical and sustainable partnerships.

Commitment to the Diversity Charter

Since 2010, we have been signatories of the Diversity Charter, affirming our commitment to promoting equal opportunity and fighting all forms of discrimination.

It defines the principles we apply every day to maintain an inclusive and respectful workplace for employees, partners, and clients alike. Its goal is to prevent discrimination and foster inclusivity.

1.3 Compliance with Laws and Regulations

We commit to complying with all applicable laws and regulations in the countries where the Group operates.

This includes full adherence to the French Sapin II Law of December 9, 2016 on transparency, anti-corruption, and economic modernization. We ensure that employees, partners, and clients adopt practices that align with this law.

We are especially attentive to personal data protection, complying with the EU's General Data Protection Regulation (GDPR) effective May 25, 2018. All data collected and processed in our operations is managed transparently, securely, and with respect for individuals' rights.

Likewise, codes of conduct, industry regulations, and other applicable sector documents are annexed to this Charter. Once annexed, they form an integral part of the Charter and are binding for all relevant employees. The Group reserves the right to include new ethical references at any time to ensure compliance with applicable professional standards.

It is each employee's, partner's, and client's responsibility to be aware of applicable laws and obligations and to comply with them fully.

All stakeholders must remain vigilant in ensuring compliance and must report any observed irregularities or violations.



ETHICAL VALUES AND PRINCIPLES

Our values and ethical principles stem from our mission to work for a safer world.

2.1 Guarantee of Fundamental Rights

At Saretec, we are committed to respecting human rights wherever the Group operates. This requirement is inherent to our corporate purpose and inseparable from the values upheld by the Group.

2.1.1 Dignity and Non-Discrimination

We offer a work and professional environment where every individual is treated with respect and dignity.

This principle applies to our employees, partners, and clients. The protection of human dignity is a core value of Saretec's activities. Everyone has the unconditional right to dignity.

We are committed to ensuring that every employee, client, or partner enjoys their rights without distinction.

We promote equality and reject any form of discrimination, harassment, or violence based on prohibited grounds such as ethnic, national, social or cultural origin, gender, sexual orientation, disability, age, family status, religion, political beliefs, or union affiliation.

Each employee is offered equal opportunities for development and advancement, regardless of gender. Equal treatment is integral to our Human Resources policy. We prohibit any form of discrimination in recruitment, pay, working hours, leave, maternity/paternity protections, job security, role assignments, evaluation, training, career development, or occupational health and safety.

By protecting individuals from physical or psychological harm, we uphold everyone's right to personal integrity.

Our employees are committed to preventing all forms of discrimination and to acting as role models in this regard.

2.1.2 Respect for Confidentiality and Data Protection

We place the utmost importance on confidentiality and

the protection of data handled as part of our operations.

Confidential data includes any technical, commercial, or financial information provided by clients and suppliers, as well as personal and family-related information about our clients, service providers, and employees.

To safeguard this data, we implement robust information system security protocols to ensure data integrity and confidentiality.

We collect only the personal and confidential data strictly necessary for professional purposes, and process it lawfully. Data is retained and archived only for as long as justified by its intended purpose.

Access to confidential and personal data is strictly limited to authorized individuals. Data may be processed by our Group teams, subcontractors, and, where applicable, by administrative or judicial authorities. Any person with access to such data must comply with these provisions.

All individuals benefit from the same level of data protection regardless of role or status. No data processing may infringe on personal privacy or result in discriminatory treatment.

We comply with applicable data protection laws and regulations in every country where we operate. In accordance with EU law, individuals residing in the European Union are informed about how their data is processed and their rights, enabling them to retain control.

2.1.3 Intellectual Property Rights

Saretec Group respects and protects intellectual and industrial property rights.

According to the World Intellectual Property Organization (WIPO), this includes all "creations of the mind: inventions; literary and artistic works; designs; and symbols, names and images used in commerce."

Any creation, invention, patent, trademark, copyright, or other intellectual or industrial property developed as part of Saretec's activities remains the exclusive property of the Group. Unauthorized reproduction is strictly prohibited.

Similarly, Saretec shall not exploit a third party's property—by producing, selling, or using any trademark, patent, industrial design, or copyright—without proper authorization. Any potential infringement must be reported and avoided.

Employees must actively protect intellectual and industrial assets, comply with internal policies, and report any violations involving the Group or third parties.

2.1.4 Guarantee of Responsible Working Conditions

Our social policy includes guaranteeing responsible working conditions for both employees and contractors.

2.2 Environmental Responsibility

Environmental issues are integral to our sustainability objectives.

Environmental responsibility is embedded in our operations with employees, clients, and partners. We strive to limit and reduce:

Pollution related to our operations: We favor eco-design in our recommendations and interventions, choosing materials and techniques with lower ecological impact.

Greenhouse gas emissions: We promote sustainable resource use, optimize travel, reduce energy consumption, and manage waste responsibly.

We are committed to providing a calm, growth-oriented, and career-supportive work environment.

As an employer, we are responsible for offering safe and healthy conditions. We ensure that all employees work in secure environments in compliance with health and safety standards.

Freedom of expression is essential. Everyone has the right to speak openly about working conditions or company practices without fear of reprisal. Union freedom is recognized and protected.

We also promote employability by ensuring employees maintain and grow their ability to work. We tailor roles to evolving technologies and individual needs, supporting effectiveness and well-being.

We promote a healthy balance between professional and personal life to support workplace wellness.

We follow the precautionary principle, taking preventive action even when scientific certainty is lacking.

We comply with all environmental laws and adapt our practices as regulations evolve.

These commitments reflect our dedication to protecting the environment and encouraging sustainable behavior among stakeholders.

2.3 Integrity in Saretec Professions

2.3.1 Professional Diligence

Our mission requires us to act with the utmost honesty.

We uphold ethics through professional diligence, with additional role-specific requirements annexed to this Charter.

Loyalty and Integrity

Loyalty and integrity are foundational values in our professional conduct.

We maintain impeccable integrity and prevent any actions that could compromise client trust.

Employees act with integrity, complying with laws and Group policies. They must not falsify, hide, or omit key information.

Employees act loyally toward both clients and Saretec. They must not misuse internal tools for personal or indirect benefit, even if this does not compromise work quality.

External stakeholders must also act with integrity and loyalty in their dealings with us.

Impartiality and Independence

We operate independently from parties involved in our activities to guarantee impartial service.

This means decisions are made without outside influence, favoritism, or bias.

To preserve independence and impartiality, employees must:

- ▼ Avoid making value judgments or assumptions
- ▼ Avoid personal or indirect involvement
- ▼ Avoid holding conflicting interests
- ▼ Avoid representing opposing interests

If such a situation arises, even if it does not impact work quality, the employee must step away from the assignment, inform stakeholders, and report it to their manager.

Failure to do so may lead to appropriate action.

Transparency and Professionalism

Employees must be fully transparent when carrying out their duties.

This includes clearly and thoroughly communicating relevant information to concerned parties. No detail that could influence decision-making may be withheld. This applies especially to the principle of adversarial fairness.

Employees, as experts in their fields, communicate clearly and pedagogically when needed to ensure comprehension.

In case of errors or omissions—even those that do not affect work quality—employees must limit the consequences, inform stakeholders, and notify their manager. Failure to do so may result in appropriate action.

Employees are expected to act with professionalism, integrity, and precision. If obstacles hinder proper task execution, they must withdraw from the case or seek managerial support to maintain quality.

2.3.2 Commitment to Exemplarity

At Saretec, we aim to maintain the highest standards of integrity in all activities. Exemplarity is essential.

Employees are encouraged—particularly through this Charter's whistleblowing provisions—to report any suspicious activities, including:

Fraud Prevention

Fraud contradicts our principles. We are committed to detecting, preventing, and addressing it.

Fraud is defined as a deliberate act to gain advantage, cause harm, or circumvent laws through deception or dishonest means. This includes falsification, concealment, or manipulation.

Fraudsters may target Saretec, employees, partners, or clients. We are all responsible for vigilance. Saretec expects the same from partners and clients.

We implement internal prevention procedures to help employees recognize fraudulent behavior.

Fraudulent activities initiated by employees are strictly prohibited. In cases of suspected or confirmed fraud, appropriate measures will be taken.

Anti-Corruption

We take all necessary measures to prevent, detect, and punish corruption or influence peddling in our operations.

Corruption contradicts our values. It is defined as the abuse of power or position for personal or indirect gain. This includes influence trading, favor exchanges, or bribery.

We expect partners and clients to uphold these same principles and take necessary action against corruption or influence peddling.

Internal procedures help employees recognize corrupt practices.

Employee-initiated corruption is prohibited. Suspected or confirmed cases will result in appropriate action.

Compliance with Competition Rules

Saretec supports free, fair competition. We prevent abuses of dominant positions.

Internal procedures help employees identify behaviors that may harm competition.

Relationships with competitors require special care. Employees avoid behaviors that could compromise fair competition.

We prohibit abuse of economic dependence, illegal information exchanges, or unlawful agreements that restrict competition.





RISK PREVENTION

3.1 Whistleblowing Mechanism

Introduction to the Ethics Alert Channel

Saretec's purpose is to build a safer world. In line with this, and in accordance with the French law of December 9, 2016 on transparency, anti-corruption, and economic modernization, we have established an ethics whistleblowing mechanism.

This system includes a digital reporting channel that allows employees or external parties to report any conduct or situation contrary to law or ethical principles.

Its aim is to prevent escalation of harmful situations, encourage responsible behavior, and implement corrective measures when needed.

The system is structured according to internal procedures that may evolve without requiring amendments to this Charter.

The management remains the main point of contact for employees wishing to raise concerns. Managers and the Human Resources Department (drh@Saretec.fr) are available and trained to receive alerts.

These mechanisms also ensure protection for whistleblowers, preventing retaliation in accordance with the French law of March 21, 2022 to improve whistleblower protection.

3.2 Managing the Risks of Collusion

Conflict of Interest

As part of our anti-corruption commitment, Saretec strives to limit risks of conflict of interest.

Transparency International defines a conflict of interest as:

"A situation that arises when a person's impartiality, independence or objectivity in performing their duties may be influenced by a different public or private interest from the one they are supposed to defend."

In other words, a conflict of interest exists when an individual has a personal or indirect interest likely to affect the integrity of their work or decisions.

Due to the nature of our professions, we must be especially vigilant to ensure impartiality, transparency, and service quality. We do our utmost to limit such risks.

Special attention is paid to identifying connections between collaborators and their assignments. Audits are carried out to verify compliance with our commitments.

A conflict-of-interest management system is in place and governed by internal procedures subject to future updates without requiring revision of this Charter.

Employees must recuse themselves from tasks that may give rise to conflicts of interest. Employees must avoid any personal interests that could affect their work, even if the situation would not harm the client or Saretec.

It is the responsibility of each individual to assess their situation and identify any conflicts of interest.

If such a situation arises—or if one is suspected—the employee must immediately inform their supervisor according to internal procedures. Failure to report may lead to disciplinary action, as appropriate.

Risk of Collusion

As part of our commitment to exemplary conduct, Saretec also strives to minimize the risk of collusion.

Collusion is defined as a secret agreement to the detriment of a third party.

We reject all anti-competitive behavior and commit to safeguarding the confidentiality of sensitive data within our commercial relationships.

A risk management system for collusion is in place, governed by procedures that may be updated without altering the Charter.

Our employees are equally committed to refraining from any direct or indirect collusion or agreements that could harm a third party. Likewise, they must not disclose sensitive or strategic information that could restrict competition.

If such a situation arises, or if there is a risk of collusion, the employee must promptly report it to their manager as per internal procedures. Failure to comply may lead to disciplinary action.

Adversarial Principle

As part of our activities and internal policies, we uphold the adversarial principle to guarantee the ethics of our decisions and actions.

This principle ensures that all parties involved are properly informed of the elements raised against them.

Accordingly, concerned parties are clearly and thoroughly informed of the opposing arguments and observations.

Each party is given the opportunity to respond before any final decision is made.

Decisions are made only after impartial assessment of the facts and arguments.

In cases of non-compliance with this principle, the affected parties may raise the issue in accordance with this Charter.

3.3 Communication with Stakeholders

Dissemination via External Channels and to Saretec Clients

Saretec ensures this Charter is distributed to external stakeholders, particularly clients.

The Charter is accessible on Saretec Group's official website.

Awareness Among Employees and Providers

To ensure a shared understanding of Saretec's ethical rules, all employees receive training.

The Charter is distributed to all existing and future subsidiaries and communicated to new employees and service providers upon arrival. It is also available on the Group's intranet.

The Charter is binding for all.

Managers are responsible for embodying the Charter's commitments and promoting them among their teams. Individually, every employee is expected to adhere to these principles in all professional circumstances.

Employees with questions about expected conduct or interpretation of the Charter should consult their manager or the HR department.

Non-compliance with the Charter, its annexes, or related policies may result in disciplinary measures proportional to the severity of the violation, including contract termination.



FINAL PROVISIONS

4.1 Charter Dissemination

The Charter is distributed to all employees via the intranet, ensuring easy and ongoing access.

For clients and suppliers, it is available on the official website, providing transparency on Saretec's ethical commitments and shared values.

Any updates or revisions will be communicated in the same manner to ensure understanding and continued support of our guiding principles.

4.2 Validity Period of the Charter

This Charter is established for an indefinite duration. It remains valid until the management decides to revise or amend it.

As an evolving document, it will be reviewed periodically to reflect the Group's needs, stakeholder expectations (employees, clients, suppliers), and changes in law and regulation.

4.3 Modification and Revision of the Charter

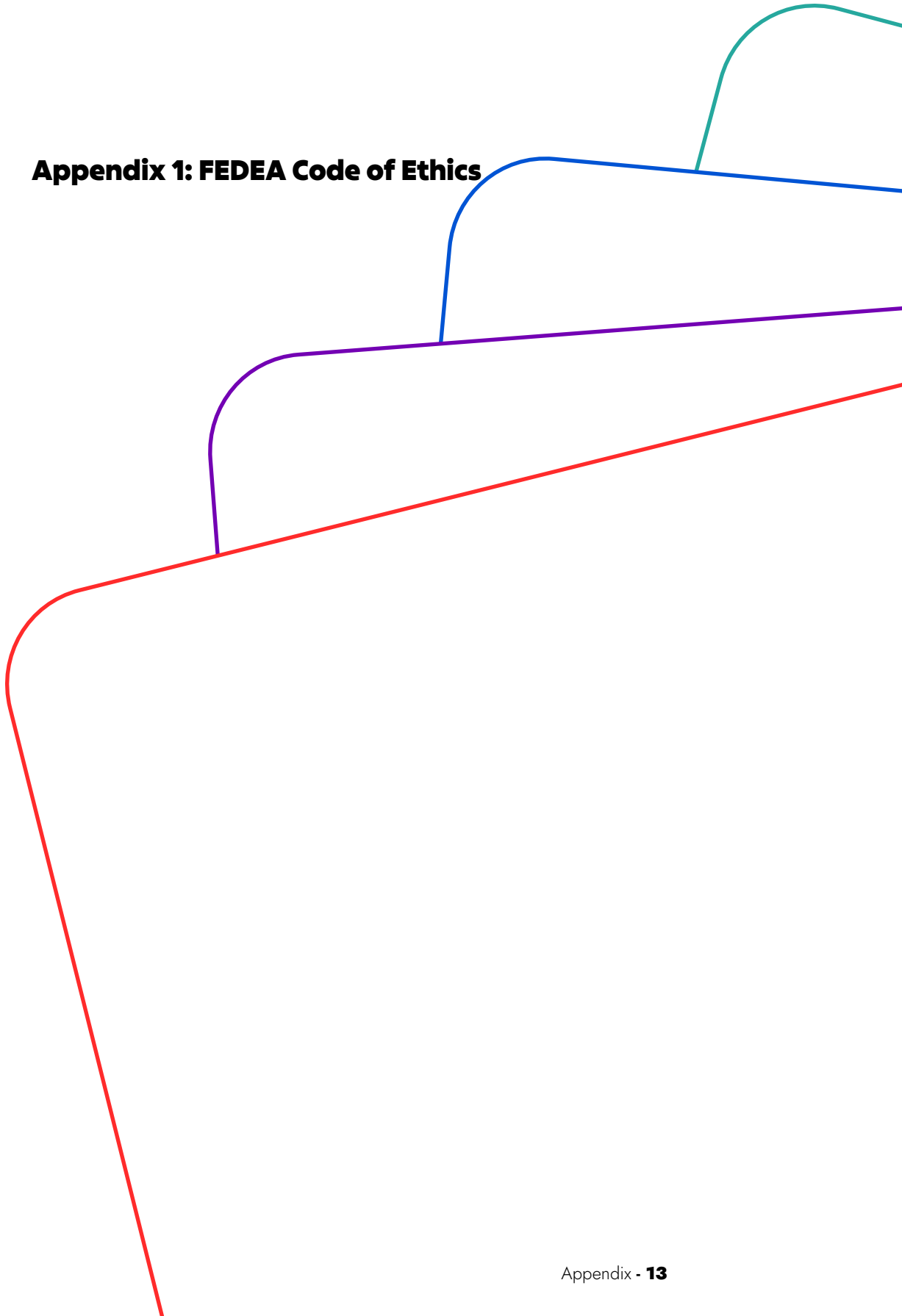
The Management reserves the right to modify or revise the Charter at any time to reflect internal developments, legislative or regulatory changes, or other relevant requirements.

This communication will strengthen shared understanding and ongoing commitment to our ethical values.

These changes will be made in the Group's best interest, while respecting the rights and reasonable expectations of employees, clients, and suppliers. In the event of major changes, stakeholders will be informed within a reasonable timeframe and granted access to the new applicable terms.

APPENDIX

Appendix 1: FEDEA Code of Ethics





SARETEC GROUP

www.saretec.fr