



SUSTAINABILITY RISK INTEGRATION POLICY

Société Générale Life Insurance Broker (SGLIB)

In accordance with the Regulation EU 2019/2088 on Sustainability Disclosure in the Financial Services Sector (“SFDR.”), Société Générale Life Insurance Broker (“SGLIB”) has established, in its capacity as insurance intermediary, a policy relating to the integration of sustainability risks.

Sustainability risk refers to an environmental, social or governance event or situation which, if it occurs, could have a significant negative impact on the value of the investment. Sustainability risks may include:

- | **Transition risks**, resulting from the effects of the implementation of a low-carbon economic model (regulatory and legal risks, technological risks, reputational risks and risk of market opportunities);
- | **Physical risks**, resulting from damage caused by extreme weather and climate events. These can be acute (due to natural events such as fires) or chronic (linked to rising temperatures and long-term geographical changes such as rising water levels). They include heat, cold, drought, tropical cyclones, fires and floods;
- | **Social risks and those related to fundamental human rights**, negatively impacting workers and the communities around them (forced labor and slavery, child labor, respect for indigenous peoples and their cultural heritage, right to property, discrimination, freedom of association, personal health and safety, decent working conditions, remuneration and social protection, right to privacy);
- | **Governance and other ethical risks** (sanctions and embargoes, terrorism, corruption and influence peddling, appropriation of resources, tax evasion, data protection).

In order to assess the expected profitability of a recommended product, the financial information must be supplemented by extra-financial criteria, known as “ESG”:

- | **The Environmental criterion (“E”)**, including energy efficiency, reduction of greenhouse gases and waste treatment;
- | **The Social criterion (“S”)**, concerning in particular respect for human rights and workers' rights, management of human resources (health and safety of workers, diversity);
- | **The Governance criterion (“G”)**, linked to the independence of the boards of directors, to the remuneration of the directors and to the respect of the rights of minority shareholders.

I. SUSTAINABILITY RISK POLICY*

1. IDENTIFICATION AND EVALUATION OF PRODUCERS

As an insurance intermediary, SGLIB distributes insurance-based investment products (hereinafter the “Products”) which are designed by different insurance companies within the field of SFDR (“Producers”).

SGLIB considers the sustainability risk of the Producers with whom it has a business relationship by ensuring that they have a policy of integrating these risks in accordance with SFDR.

SGLIB's analysis of the Producers' sustainability risk is carried out at several stages of the business relationship:

- | at the beginning of the business relationship
- | in the event of substantial changes in the offer of a Producer's Products; or
- | In the event of the publication of controversies or negative information relating to a Producer.

2. TRANSPARENCY

SGLIB does not act as an asset manager or investment advisor within insurance-based investment products. Its advisory activity focuses on the choice of insurance product and types of financial support adapted to its customers.

To enable its clients to make informed decisions, SGLIB ensures that they have all the information necessary to take into account “ESG” risks before making an investment decision.

SGLIB works closely with the Producers to ensure that they:

- | comply with regulations and transparency requirements for sustainable finance;
- | provide to SGLIB and its customers with the pre-contractual information necessary to provide proper information to its customers;
- | transmit, where appropriate, periodic reports on sustainable investments and the promotion of environmental or social characteristics.

* Article 3 SFDR

II. NOT CONSIDERING NEGATIVE IMPACTS ON SUSTAINABILITY FACTORS*

As an insurance intermediary, SGLIB relies on the data provided by the Producers to communicate information to its customers on considering negative impacts on sustainability factors. These refer to environmental, social and wage issues, as well as respect for human rights and to the fight against corruption and corruption.

The Producers are solely responsible for the data provided and their content. SGLIB has no obligation to verify the content and relevance of the data, its role being limited to ensuring that the Products comply with the requirements imposed by SFDR. according to their categorization.

To this day, SGLIB does not consider the negative sustainability impacts as defined by SFDR on sustainability reporting in the financial services sector. However, SGPB is committed to integrating negative sustainability impacts into the insurance advisory services following the stabilization of regulatory texts, the homogenization of methodologies and the reliability of data transmitted by insurance companies.

* Article 4 SFDR

III. INTEGRATION OF SUSTAINABILITY RISKS INTO THE REMUNERATION POLICY

SGLIB undertakes to ensure that the staff remuneration policy is not in any way linked to the performance of investments in recommended insurance products and does not encourage risk-taking, including sustainability risks.

¹ An ESG controversy can be defined as an existing incident or situation to which a company is confronted because of allegations of negative behavior towards various parties (employees, communities, environment, shareholders, the company at large), through bad practices relating to several ESG indicators.

* Article 5 SFDR