

# IMPACT REPORT

2024



**oney**  
YOUR MONEY YOUR WAY



**Jean-Pierre CHARLES,**  
*Chief Executive Officer.*

Aware of the role we have to play in society, we have been asserting our ambition to be a more responsible, people-centred bank for many years.

We want to develop sustainable partnerships and work with our stakeholders to drive more responsible consumption, taking care to respect planetary boundaries and make people a core focus in our actions.



### **CREATING AN ESG-DRIVEN DYNAMIC WITH ALL OUR STAKEHOLDERS**



We are proud to publish our very first impact report. It is the result of a voluntary policy aimed at measuring our impact more effectively and reporting as transparently as possible on the progress we have made on this responsible path. More than just a report, it reflects a more far-reaching ambition focused on creating an ESG-driven dynamic with all our stakeholders.

We are particularly attentive to the direct impact of our activities, but also to more indirect effects, linked in particular to consumption by our customers.

That is why we are committed to reducing our own footprint but also to building a better future with our partners by developing solutions that combine responsibility and shared value creation.

To achieve this goal, our employees work together in an environment that promotes well-being and cooperation, supported by an integrated HR policy that puts people front and centre.

The results disclosed in this report are positive and reflect a dynamic that holds us to account in the eyes of society and drives our employees in all of their duties. With the support of our two shareholders, *BPCE* and *ELO*, we very much see this initiative as a lever to achieve our strategic ambitions and contribute, at our own level, to creating a more sustainable and people-focused world and future for all of us.

This impact report, which *Oney Group* has voluntarily chosen to prepare, describes our contribution in all ESG (*Environment, Social and Governance*) aspects across all our business lines, in France and in our international markets.

**This report reasserts *Oney Group's* ambition to promote more sustainable consumption, respect planetary boundaries and put people front and centre in our actions.**

In the first section of this report, we describe our commitment to transforming commerce, through a CSR policy that is embedded in our development model and governance in which sustainability is a primary focus.

The second section covers the **Environmental (E)** aspects of our actions, and in particular the way in which *Oney Group* contributes to the decarbonisation of the economy and the development of the circular economy by making it easy for everyone to have an impact and taking action to reduce our own footprint.

The third section covers the **Social (S)** dimension and underlines *Oney Group's* internal policies, through which we are able to (i) ensure a safe and fair working environment for all our employees, (ii) engage with the workers in our value chain and (iii) continue to fulfil our role as an inclusive and protective bank.

The last section devoted to **Governance (G)** reflects our commitment to doing business ethically and responsibly.



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# I. Making sustainability issues a core focus of Oney Group's governance and commitment

1.

PARTNERING THE TRANSFORMATION OF COMMERCE THROUGH A CSR POLICY EMBEDDED IN OUR DEVELOPMENT MODEL

2.

ONEY, A RESPONSIBLE GROUP WHERE PEOPLE ARE EVERYTHING

3.

GOVERNANCE IN WHICH SUSTAINABILITY IS A PRIMARY FOCUS

4.

TAKING ESG RISKS INTO ACCOUNT

5.

TAKING NON-FINANCIAL ISSUES INTO CONSIDERATION THROUGH OUR SUSTAINABLE PARTNERSHIPS AND OUR STAKEHOLDERS



# 1. PARTNERING THE TRANSFORMATION OF COMMERCE THROUGH A CSR POLICY EMBEDDED IN OUR DEVELOPMENT MODEL

In more than 40 years of existence, *Oney Group* has become **a strategic ally for retailers**.

Our expertise in payment, financing, insurance and anti-fraud solutions, coupled with our position as a leading provider of split payment solutions in France, are recognised strengths in our market, which are enabling more than **37,000 retailers in Europe** today to speed up their development and respond to new ways of consuming.

In an economic context overshadowed for many years by diminishing purchasing power, consumer financing solutions have become a powerful aid for more than 6.7 million consumers, who use *Oney* to make purchases while keeping their budget under control. This unique positioning makes *Oney Group* **a key contributor to the vitality of commerce**.



## OUR DNA

### TWO SHAREHOLDERS

- › Expertise spanning more than 40 years, with two shareholders:
- › *BPCE* (50.1%);
- › *ELO* (49.9%).

### EUROPEAN DIMENSION

A European presence to support the development of the retailers we work with.

### COMMITMENTS

Promoting more sustainable consumption, respecting planetary boundaries and putting people front and centre in our actions.

## OUR STRENGTHS

### EMPLOYEES

- › 1,985 employees;
- › 92/100 workplace gender equality score;
- › 40% of senior management positions held by women.

### COVERAGE OF ALL NEEDS

A wide range of solutions: deferred payment, Buy Now Pay Later (*BNPL*), personal loans, insurance, fraud prevention, etc.

### RECOGNISED EXPERTISE

A leader in split payments in France.

## OUR 3P STRATEGY

### PLANET

#### Helping to respect planetary boundaries by:

- › Facilitating access to eco-friendly goods and services that support more sustainable consumption;
- › Working to reduce our carbon footprint.

### PEOPLE

#### Putting people front and centre by:

- › Spearheading initiatives to promote inclusion, diversity and solidarity;
- › Providing our employees with an environment conducive to their well-being and professional development.

### PARTNERSHIPS THAT ARE SUSTAINABLE

#### Creating shared value by:

- › Being a strategic ally of “better consumption” players;
- › Supporting all our customers, regardless of their circumstances, status or needs.






OUR VALUE CREATION

€100 MILLION IN FINANCING FOR THE SUSTAINABLE ECONOMY

Energy retrofittingEnergy transitionCircular economy


FINANCIAL PRODUCTS AND SERVICE

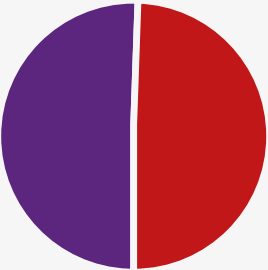
Entity	Products	Business Model
	<ul style="list-style-type: none"><li>› Loans for specific projects</li><li>› Personal loans</li><li>› Revolving credit</li><li>› Zero interest energy retrofit loans</li></ul>	Consumer loans
	<ul style="list-style-type: none"><li>› BNPL</li><li>› Credit cards</li><li>› Gift cards</li></ul>	Payment services
	<ul style="list-style-type: none"><li>› Fraud prevention solutions</li></ul>	Fraud prevention
	<ul style="list-style-type: none"><li>› Credit insurance</li><li>› Payment insurance</li><li>› Personal protection insurance (disability, accident, unemployment, basket, end of month)</li><li>› Dog/cat insurance</li><li>› Car insurance</li></ul>	Insurance

CUSTOMERS AND PARTNERS


- › 6.7 million consumers who use Oney
- › 37,000 partners (retailers, PSPs, merchants, e-merchants, etc.)

50.1%






49.9%



- ✓ Rated A+ by S&P.
- ✓ 2<sup>nd</sup>-ranked banking operator in France and 5<sup>th</sup> in Europe.
- ✓ €23.3bn in NBI in 2024.
- ✓ 103,000 employees in more than 50 countries.

- ✓ 3 companies. 
- ✓ A unique shareholder structure : family- and employee-based.
- ✓ €32bn in revenue in 2024.
- ✓ 159,000 employees in 13 countries.

OUR DNA: A SHAREHOLDER STRUCTURE THAT BRINGS TOGETHER BPCE AND ELO, SHAPING OUR UNIQUE RETAIL/BANKING DNA

Since 2019, BPCE Group has held **50.1%** of Oney Group's share capital alongside ELO - parent company of Auchan with **49.9%**. Oney is a unique bank in the commercial landscape that can count on the support and synergies offered by its two shareholders and boasts an entrepreneurial culture combining family/retail and mutual/banking roots.

WITH A EUROPEAN DIMENSION

Oney Group wants to become **a major European consumer financing operator**.

We provide solutions to customers **in France and abroad** in more than 10 countries.

OUR 3P STRATEGY

Oney Group's commitment is reflected in a CSR policy embedded in our development model. To meet present and future societal and environmental challenges, Oney Group **is working to shape a fairer, more people-focused and sustainable world**.

This ambition hinges on three fundamental pillars: **Planet, People and Sustainable Partnerships**.

## OUR VALUE CREATION

### BtoC OFFER

More specifically, *Oney Bank's* mission is to become **the go-to partner for consumers** by helping them make their plans a reality and facilitating their daily lives.

The solutions we offer our customers include:

- › **Personal loans** to purchase a car, carry out work on their homes or go on holiday;
- › **Revolving credit** for unforeseen events, offering a quick and accessible cash flow solution;
- › **Loan repurchases** so that customers can group their debt into a single loan.

### BtoB/BtoBtoC OFFERS

When it comes to relationships with our partners, *Oney Group's* corporate purpose is to build and deliver a unique and committed value proposition that satisfies our partners and their customers, without harming the planet. This proposition involves supporting our partners' customers through varied solutions, recruiting new partners with a full range of insurance, financing and fraud management solutions, ensuring high availability rates among our staff, driving international development and supporting business.

The solutions we offer our partners' customers encompass most *Oney Group* solutions, including:

- › **BNPL** (payment solution in 3 or 4 instalments by bank card);
- › **Instalment loans for specific purchases;**
- › An offer that **combines a zero-interest loan and an instalment loan** for a specific project in order to finance energy retrofits;
- › A **Resplit** solution that enables customers to spread their payments over a longer period;
- › A **Forward Trade In** solution, which makes financing more accessible to customers;
- › Payment **cards**;
- › **Revolving loans.**

Internationally, *Oney Group* is a key partner for the European payment ecosystem. Our payment and financing solutions are **accessible via two integration methods**: either directly via the *Oney* payment **API**<sup>1</sup> or through one of our **PSP**<sup>2</sup>/**CMS**<sup>3</sup>/**GDS**<sup>4</sup> partners.

The Group is certified and accredited in all the countries in which we operate: all flows and data are secure.

### INSURANCE OFFER

Through our subsidiary *Oneyinsurance*, we also provide our customers with insurance solutions tailored to their needs, in order to cover risks and provide peace of mind day after day.

Our wide range of insurance products includes:

- › **Credit insurance**, which comes with most *Oney* loans;
- › **Insurance covering means of payment;**
- › A range of **6 personal protection insurance products** designed to cover the main life hazards such as death, hospitalisation, disability and injury;
- › **Purchase protection;**
- › **Car and Home insurance** co-brokered with LSA.

*Oney Group* also offers affinity insurance in conjunction with our partner brands.

### ONEYTRUST

With our subsidiary *Oneytrust*, *Oney Group* stands out as **the French expert in combating fraud and synthetic identity theft**, providing our partners with the means to protect themselves against all types of fraud throughout the customer journey:

- › Continuous identity checks;
- › Data orchestration;
- › Proactive fraud detection;
- › Shared database of transactions carried out by partners' customers (authorised by the French data protection agency CNIL).

**Our mission at Oney is to support the transformation of commerce.** With this in mind, we have been committed for more than 10 years to the **circular economy**, supporting pure players in this market as well as retailers who develop circular solutions.

We have made this a strategic focus of our development. We now want to take this dynamic to the next level by positioning ourselves as the go-to financial partner for operators who, like us, want to **contribute to more responsible consumption.**

The enrichment of our offer and our desire to respond to new consumer uses are fully in line with this ambition. This concerns both our financing solutions, which facilitate access to such goods, and our affinity insurance solutions.



**Julien CAILLEAU,**  
*BtoB Director,  
Deputy CEO  
in charge of CSR.*

<sup>1</sup> **API** : Application programming interface.

<sup>2</sup> **PSP** : Payment Service Provide.

<sup>3</sup> **CMS** : Content Management System.

<sup>4</sup> **GDS** : Global Distribution System.



## 2. ONEY, A RESPONSIBLE GROUP WHERE PEOPLE ARE EVERYTHING

**Oney Group is committed to a sustainable development approach**, whereby we seek to minimise our ecological footprint while working to have a more positive impact on society. Mindful of the environmental issues facing today's world, we have taken concrete measures to integrate sustainability into our activities by drawing on essential elements of our corporate culture, namely inclusion, diversity and solidarity.



**FINANCE MUST SERVE PEOPLE, NOT THE OTHER WAY AROUND.**



Oney Group firmly believes that finance should serve people, not the other way around. That is why we are so committed to offering solutions that are in our customers' interests, by enabling them **to consume in a more responsible and thought-out manner**. Our customer-centric approach aims to create a space where everyone has the power to make informed decisions to improve their daily lives.

Our 3P strategy (*Planet, People and sustainable Partnerships*) is a perfect illustration of our desire to become the go-to financial partner when it comes to the circular economy and the energy transition.

### WORKING WITH OUR CUSTOMERS TO REDUCE ENVIRONMENTAL IMPACTS

**Impact solutions:** our approach aims to quickly implement and deploy measures to mitigate and adapt to environmental and socio-economic impacts:

- › Supporting the customers of our partner brands in the energy transition by providing financing solutions that are adapted and integrated into customer journeys, with an offer that combines zero-interest energy retrofit loans with instalment loans granted for specific projects, sometimes co-created with our partners (e.g. *energy retrofits bringing together Leroy Merlin and BPCE*);
- › Supplying bank cards made out of recycled PVC;
- › Promoting the circular economy by offering affinity insurance solutions alongside the products sold by our partner brands to encourage consumers to have their consumer goods repaired;
- › **Supporting the shift in the energy mix:** faced with the climate emergency, the priority is to accelerate the development of a sustainable energy system, namely by providing financing for solar panels through instalment loans for specific projects, in a bid to contribute to the production and consumption of renewable energy;
- › **Digitising the offer subscription process:** as an e-commerce player, Oney Group has a very comprehensive digitised offer, which makes for less of an environmental impact than a paper-based process (*in bank branches*). This offer also enables us to meet the expectations of our customers while respecting our commitment to the planet.

### SUPPORTING ALL OUR CUSTOMERS

We are committed not only to helping our customers make their plans a reality, but also to providing them with the tools to make informed and more responsible decisions when it comes to managing their finances. As part of this, we support initiatives that help our customers **better understand and manage their budget on a daily basis**.

Oney Group has been working since September 2020 with expert advisors from the Crésus network as part of a programme designed for employees who come into contact with our 6.7 million customers.

This programme is designed to enhance customer support in 3 areas:

- › **Detecting vulnerable customers**, by training Oney Bank SA's customer advisors to perceive and interpret signs of financial weakness and adopt a "budget coach" stance;
- › **Facilitating the link between the detection** by Oney **of vulnerable customers** and their care by Crésus' expert advisors in budget management, intermediation and budget support;
- › **Raising awareness among vulnerable customers** by providing them with budget education content on the Oney website and on our social media channels. Link to content hub *Oney.fr* : <https://www.oney.fr/guide-pratique-au-quotidien/conseils>.

In Portugal, Oney and the *Non-Governmental Development Organisation (NGDO) Sol Sem Fronteiras* have been promoting a **financial education programme** over the last four years that has involved the participation of approximately 5,500 students at 61 schools of different levels. A total of 219 sessions have been held so far in which 75 Oney volunteers have participated.

In 2024, Oney organised 51 financial education sessions at 16 schools in Portugal. In its 4<sup>th</sup> consecutive year, the financial literacy programme "*I say, you count, he counts, everyone counts*" involved more than 1,200 students aged 6 to 14 and was supported by 46 teachers.

As part of the French online and digital accessibility law (RGAA), we are also working **to make our digital content and services understandable and usable by people with disabilities**.

### ONEY X SOL SEM FRONTEIRAS (RESULTS FOR THE PAST 4 YEARS)

**219**  
FINANCIAL EDUCATION  
SESSIONS

**61**  
SCHOOLS

**5,500**  
STUDENTS

**75**  
ONEY VOLUNTEERS

### 3. GOVERNANCE IN WHICH SUSTAINABILITY IS A PRIMARY FOCUS

#### 3.1 ROLE OF SUPERVISORY AND MANAGEMENT BODIES

##### ROLE OF SUPERVISORY AND MANAGEMENT BODIES

Oney Group is managed by two effective managers (within the meaning of Article L. 511-13 of the French Monetary and Financial Code): Jean-Pierre CHARLES, Chief Executive Officer and Stéphanie CLAVIÉ, Legal, Finance and Procurement Director and Deputy CEO.

The bank is administered by a Board of Directors composed of **10 members** appointed under the conditions set out in Article 14 of our articles of association, i.e. 5 directors appointed based on a recommendation made by BPCE, including the Chairman of the Board of Directors, and 5 directors appointed based on a recommendation made by ELO. In 2024, **2 non-voting members** joined the other governance members, half of whom are recommended for appointment by BPCE and the other half by ELO. They are tasked with reviewing matters that the Board of Directors, or its Chairman, submits for their consideration and lending their expertise and experience to the Board's discussions.

**Two members of the works council ('CSE')** attend all meetings of the Board of Directors in an advisory capacity.

The Board of Directors carries out the duties vested in it by law and acts in all circumstances in Oney's corporate interest, taking into account the social and environmental issues related to its activity. It determines Oney's business policies and oversees their implementation.

The Board of Directors has set up committees to **facilitate its operation and to contribute effectively to the preparation of its decisions**. Four such committees have been set up with specific duties that are described in detail in each committee's rules of procedure. These are as follows: **Strategy Committee, Appointments and Compensation Committee, Risk Committee and Audit Committee**.



**Jean-Pierre CHARLES,**  
Chief Executive Officer.



**Stéphanie CLAVIÉ,**  
Legal, Finance and Procurement Director and Deputy CEO.

##### PARITY WITHIN GOVERNANCE BODIES

Ten years on from France's Copé-Zimmermann Law on parity on boards of directors and supervisory boards, the Rixain Law of 24 December 2021 reinforced requirements regarding the representation of women in senior management and governing bodies. Under this law, companies with more than 1,000 employees are required to ensure that women make up at least 30% of the members of senior management and governing bodies by March 2026, and 40% by March 2029.

Well ahead of March 2026, Oney's commitment to gender diversity meant that this first target was already reached at the end of 2024:

- › **Senior executives:** Women 42% and men 58%;
- › **Governing bodies:** women 37% and men 63%.

All stakeholders are fully committed to gender equality when directorships come up for renewal. Beyond the legal obligation, Oney's shareholders are fully committed to a diversified representation among the members of the Board of Directors, be it in terms of profiles and skills, or age and gender. With this in mind, when reviewing candidates to sit on the Board of Directors, the Appointments and Compensation Committee takes steps to ensure that a balance will be maintained or achieved, and that the Board will have a set of skills that are commensurate with Oney's activities and roadmap, and with the technical tasks assigned to the various Board committees.

However, the Appointments and Compensation Committee will always seek to have a Board that has interlocking technical skills and diverse cultures and experiences. The aim is to have profiles that enrich the angles of analysis and the opinions on which the Board can draw to conduct its discussions and make decisions, thereby promoting good governance.

At 31 December 2024, the Board of Directors had 10 members. There are five women on the Board, **bringing the ratio to 50%.**

As mentioned above, there are two effective managers at Oney Group: Jean-Pierre CHARLES, Chief Executive Officer and Stéphanie CLAVIÉ, Deputy CEO. The CEO has an Executive Management team composed of nine members, six of whom are men and three are women.

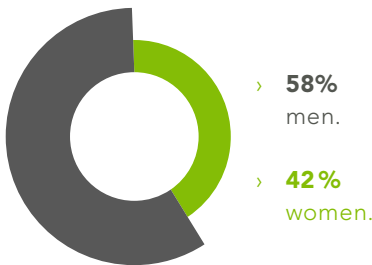
##### TRAINING OF DIRECTORS

When they are appointed, the members of Oney's Board of Directors are given an opportunity to participate in an induction day in collaboration with the Management team. The aim is to give them an in-depth overview of the organisation, its activities and its strategic plan.

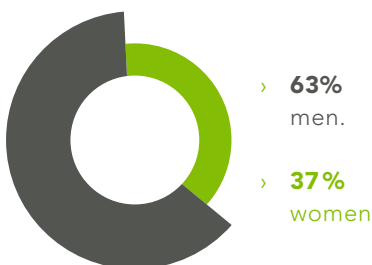
In 2024, Oney's directors had access to the training programme offered to the members of BPCE's Supervisory Board, which includes:

- › A half-day presentation covering the fundamentals of BPCE Group;
- › A continuing professional development component on general and digital banking culture;
- › An initial regulatory training component covering various topics (banking and financial markets; legal requirements and the regulatory framework applicable to a credit institution; strategic planning, understanding a credit institution's business strategy or business plan and its implementation; managing a credit institution's risks; assessing the effectiveness of a credit institution's mechanisms, ensuring effective governance, oversight and controls; interpreting the institution's financial information; accounting and auditing; combating money laundering and terrorist financing; climate and environmental risk knowledge and experience).

##### SENIOR EXECUTIVES



##### GOVERNING BODIES





3.2 SUSTAINABILITY-RELATED GOVERNANCE AT ONEY

At the level of the Board and its committees.

BOARD OF DIRECTORS

  
Yves  
TYRODE

  
8 times  
a year

**DUTIES**  
The Board of Directors carries out the duties vested in it by law and acts in all circumstances in *Oney's* corporate interest, **taking into account the social and environmental issues related to ts activity.**

It determines *Oney's* business policies and oversees their implementation.

RISK COMMITTEE

  
Cécile  
Le MOIGNE

  
5 times  
a year

**DUTIES**  
The Risk Committee is responsible for **assessing the effectiveness** of our organisation's internal control and risk management systems.

AUDIT COMMITTEE

  
Rosalie  
TOULZA-LEBASNIER

  
5 times  
a year

**DUTIES**  
The audit committee is responsible for the **financial reporting process**, the statutory audit of the annual accounts and consolidated financial statements by the statutory auditors and the independence of the auditors.

APPOINTEMENTS AND  
COMPENSATION COMMITTEE

  
Yves  
TYRODE

  
Twice  
a year

**DUTIES**  
The Appointments Committee **makes proposals** to the Board of Directors regarding the selection of directors. It regularly examines and assesses the good character and skills of the directors and effective managers.  
  
The Compensation Committee is responsible for making proposals to the Board of Directors **regarding the level and terms of compensation** of senior managers, as well as the distribution of attendance fees to be allocated to the members of the Board.

EXECUTIVE MANAGEMENT  
COMMITTEE

  
Jean-Pierre  
CHARLES

  
Once  
a week

**DUTIES**  
› The duties of the Executive Management Committee include:  
› **Signing off** on strategic CSR priorities;  
› **Overseeing** their implementation.

At Executive Management Committee level.  
  
All the bodies listed above are tasked with deploying the CSR strategy. For example, the planned energy retrofitting partnership bringing together *Leroy Merlin* and *BPCE*, the monitoring of non-financial indicators for 2024 and the validation of targets for 2025 were presented to the Board of Directors. Furthermore, the Appointments and Compensation Committee ensures that policies on compensation and appointments **uphold the principles** of transparency, respect for gender, origin and/or religion, competitiveness relative to the market and risk control, and that the interests of shareholders, managers and employees are consistent and aligned.  
  
*Oney Group's* ESG-related procedures are also implemented in a more operational manner through the organisation of a Climate Steering Committee for *Oney Bank SA*, which meets every six months to **coordinate actions to reduce greenhouse gas emission**. In 2025, a CSR monitoring committee was also established tasked with cross-functional monitoring of the consideration of CSR regulations at *Oney Bank SA*.

3.3 SYSTEM IN PLACE TO MANAGE  
ESG ISSUES/"IMPACT INSIDE"

*BPCE Group* is rolling out a new "impact" approach, enabling it to carry out its banking, insurance and investor activities to serve its customers, by driving **economic, societal and environmental performance** in the very heart of the communities and regions of the world in which it operates.

To expand its impact solutions to all customers and accelerate in each ESG dimension, *BPCE Group* has embarked on **a transformation of all its companies at all levels**.

This 2030 VISION of Impact has been co-constructed with all *BPCE Group* business lines and companies.

It takes the form of the Impact 2026 Programme, which consists of concrete commitments in terms of offering, financing policy, reducing the group's own footprint, taking ESG into account in our risk management and financial processes, as well as in the context of a renewed responsible employer policy.

The Impact programme enables each business line to fully integrate ESG issues.

Lastly, all *BPCE Group* business lines and each of its companies apply an Impact approach based on their business models and within their scopes in order to support **the group's transformation towards a more sustainable model** that will ensure financial and non-financial performance.

At the level of *BPCE Group*, the Impact department, which reports to the Chairman of *BPCE's* Management Board, proposes an ESG strategy for the group, has it approved and then drives it forward. It plays a cross-functional role within the group and looks after the overall coordination and steering of the Impact 2026 programme.  
  
Through the 3P strategy, the impact approach is deployed within *Oney Group* by a CSR team attached to the BtoB Department.

## 4. TAKING ESG RISK INTO ACCOUNT

### 4.1 PROGRAMME FOR ROLLING OUT THE ESG RISK MANAGEMENT SYSTEM

Oney Group is involved in the ESG risk management system put in place at BPCE Group level through a dedicated action plan. This action plan, coordinated by the ESG Risk department at group level, was stepped up in 2024 in line with regulatory requirements and BPCE Group's climate and environmental commitments under the VISION 2030 strategic project.

This multi-year action plan, aligned with the 2024-2026 strategic project and directly intertwined with the strategy and actions implemented through the Impact programme, is monitored quarterly by the ESG risk committee and by the BPCE Group supervisory board.

### 4.2 IDENTIFYING AND ASSESSING THE MATERIALITY OF ESG RISKS

Oney Group is part of the process implemented at BPCE Group level for identifying climate and environmental risks, which is designed to structure the understanding of the risks to which the group is exposed in the short, medium and long term and to identify the priority areas for reinforcing the risk management system. This identification process is based on:

- › The implementation of an **ESG risk reference framework**: in terms of climate and environmental risks, this framework distinguishes physical risks (*temperature, wind, water and solid masses*) from transition risks (*regulatory developments, technological developments and stakeholder expectations and changes in their attitudes*);
- › The identification and description of **transmission channels** linking climate and environmental risk factors with other risk categories (*credit risks, insurance risks, structural ALM risks, reputational risks, etc.*);
- › **An assessment of the materiality** of ESG risks with regard to other risk categories based on methods and tools enabling a qualitative or quantitative assessment of such risks.

It is structured around the following four themes: **ESG risk governance** (*procedures, roles and responsibilities, compensation*), **expansion of risk knowledge** (*monitoring systems, sector analyses and assessments, risk reference framework, methodologies and risk analysis processes, data*), **operational integration of work** (*consideration of ESG risk factors in the respective management systems and decision-making processes*) and **consolidated risk management mechanisms** (*dashboards, training plan, etc.*).

BPCE Group relies in particular on **an internal methodology for assessing environmental, social and governance issues and risks**. This methodology is based on a sectoral knowledge base documenting the main ESG issues and risks related to the sector, together with expert opinion assessments according to the focal points of the European taxonomy. These methodologies are **continuously improved** to keep pace with advances in scientific knowledge and the availability of data and analysis tools.

At the level of Oney Group, each risk was estimated individually based on the activities of Oney Bank SA, which make up the vast majority of the group's business. The estimates were then extrapolated to the group. This method is made possible by the qualitative nature of the analysis. The particularities of international activities were also factored in.

### 4.3 INTEGRATING ESG RISKS INTO THE RISK MANAGEMENT SYSTEM

In coordination with the work carried out at BPCE Group level, Oney Group is gradually rolling out tools and methods for taking ESG risk factors into consideration in its operational decision-making, based on the processes put in place by the bank's main risk functions.





## 5. TAKING NON-FINANCIAL ISSUES INTO CONSIDERATION THROUGH OUR SUSTAINABLE PARTNERSHIPS AND OUR STAKEHOLDERS

### 5.1 DIALOGUE WITH KEY STAKEHOLDERS IN OUR IMPACT STRATEGY

Oney Group has been **attentive to consumers and retailers** from day one as part of our efforts to design and adapt our solutions to the challenges posed by commerce and society: omni-channels, new payment methods, simplified purchasing pathways, security, etc.

To provide the most suitable response to stakeholder expectations, we maintain in-depth knowledge of our market by **conducting consumer surveys**, namely through our consumer trends watch unit (*Observatoire des Tendances de Consommation*) (link: <https://www.oney.com/observatoire-des-tendances-de-consommation/>) and customer satisfaction surveys.

For Oney, partnerships go far beyond a simple commercial relationship - they are at the heart of a collective approach to more sustainable consumption. At Oney, we work closely with our partners to develop solutions that combine **responsibility and shared value creation**.

Be it in the area of energy retrofitting, the circular economy or sustainable forms of transport, Oney strives to **forge lasting and meaningful links** to build a true relationship with the brands that place their trust in us.

In 2024, Oney joined forces with Leroy Merlin and BPCE to help customers in their energy retrofit plans. This partnership is designed to propose suitable financing solutions, **making energy efficiency projects more accessible to all**. This combined effort promotes the energy transition and encourages the adoption of more environmentally-friendly practices.



**PARTNERSHIPS [...] ARE AT THE HEART OF A COLLECTIVE APPROACH TO MORE SUSTAINABLE CONSUMPTION.**





## SHAREHOLDERS (BPCE AND ELO)

### METHODS OF DIALOGUE

- › Attendance at shareholder meetings;
- › Presentation of Oney's performance to the various governing bodies of the two shareholders.

### PURPOSE

- › Ensure transparency with regard to strategic objectives and financial and non-financial performance.

## MEMBERS OF THE BOARD OF DIRECTORS

### METHODS OF DIALOGUE

- › Participation in boards of directors;
- › Participation in specialised committees;
- › Working groups, if applicable;
- › Mandatory regulatory training and seminars.

### PURPOSE

- › Representation of shareholders' interests in governance;
- › Participation in the definition of strategic directions;
- › Monitoring role, most notably risk control and reliability of internal control.

## SUPPLIERS AND SUBCONTRACTORS

### METHODS OF DIALOGUE

- › Responsible purchasing policy;
- › Involvement in government initiatives (e.g. "I choose French Tech");
- › Regular meetings with strategic suppliers;
- › "Voice of suppliers" survey;
- › Preparation of certifications;
- › Feedback mechanism and satisfaction surveys;
- › Right to warn for suppliers, and introduction of an independent mediator;
- › Audit.

### PURPOSE

- › Responsible supplier relations charter, getting suppliers involved in the implementation of due diligence measures;
- › Compliance with ESG clauses incorporated into contracts;
- › Identification of progress plans to better understand supplier expectations;
- › Improvement in level of satisfaction and relationship;
- › Consultation and requests for proposals;
- › Measurement of satisfaction.

## PARTNERS

### METHODS OF DIALOGUE

- › Annual satisfaction survey for a considered assessment by retailers of their entire experience with Oney.

### PURPOSE

- › Identification of medium- and long-term actions to improve partners' customer experience.

## EMPLOYEES

### METHODS OF DIALOGUE

- › Internal feedback surveys (*Supermood/YourPulse*);
- › Annual interviews;
- › Training;
- › Internal communication;
- › LGBT+ network (*AllEquals*);
- › BPCE mentoring (*gender diversity*);
- › Employees' right to warn;
- › Consultation of staff representatives and trade union organisations.

### PURPOSE

- › Improvement in quality of life at work, and in health and safety in the workplace;
- › Employee retention and engagement (*career and talent management, development of skills and expertise*);
- › Participation of staff representatives in discussions about major strategic topics and transformations, and in the negotiation of agreements.

## JEAN-PIERRE CHARLES, MEMBER OF THE BOARD OF ASF

(French association of financial companies)

### METHODS OF DIALOGUE

- › Board of Directors;
- › Technical committees;
- › Shareholder meetings.

### PURPOSE

- › Representation of the financial sector.

## CUSTOMERS

### METHODS OF DIALOGUE

- › Surveys immediately after an event to gather spontaneous feedback from end customers about their experiences with our products, digital tools or customer relations centre;
- › 2 annual satisfaction surveys to allow for a considered assessment by customers of their entire experience with Oney.
- › Ad-hoc quantitative customer surveys via a questionnaire and/or qualitative surveys via individual chats, focus groups, etc.

### PURPOSE

- › Rapid and continuous operational improvement of the customer experience;
- › Identification of medium and long-term actions to improve the BtoC customer experience;
- › Response to an ad hoc need.

## ASSOCIATIONS, CLUBS ET NGOs

### METHODS OF DIALOGUE

- › Sponsorship of the *Crésus* federation;
- › Club Circul'R and Démarche Verte.

### PURPOSE

- › Solutions for over-indebted households and prevention of financial and economic exclusion;
- › Development of a more sustainable and circular economy.



## 5.2 METHODOLOGY FOR IDENTIFYING AND SCORING MATERIAL ISSUES

The concept of double materiality consists of considering materiality **both from an impact perspective** (*impact of our organisation’s activities on people or the environment through our value chain and through our business relationships*) **and from a financial perspective** (*impact of the external environment, resulting in risks or opportunities that have (or may have) a material financial impact on our organisation’s development*).

Oney Group is exempt from mandatory sustainability reporting under the CSRD (*Corporate Sustainability Reporting Directive*). The sustainability information provided covers the scope of BPCE Group. For this reason, the double materiality assessment carried out in the context of the sustainability report covered the consolidated scope of BPCE Group.

**At the operational level, the double materiality assessment involves two phases:**

- › IROs (*Impacts, Risks and Opportunities*) relevant to BPCE Group’s activity are identified. This work defines the scope of activities for which BPCE Group must disclose information in its sustainability report. The activities of BPCE Group and its entire upstream and downstream value chain are taken into consideration;
- › The materiality of these IROs is then assessed (*or scored*). IRO scoring means that only IROs assessed as being material from an impact or financial perspective are ultimately retained and must therefore be disclosed. The *European Sustainability Reporting Standards (ESRS)* impose the criteria that must be considered when assessing materiality;

Scoring scales have been defined by and for BPCE Group. Each scoring criterion is assessed on a scale of 1 to 4. **An IRO is considered material where it scores 3 or higher** (i.e. “high” or “very high”);

BPCE Group’s Impact department establishes the scoring methodology, and coordinates and oversees the scoring of IROs on the Group’s behalf. BPCE’s functional departments (*Compliance, Human Resources, Purchasing, Technologies and Operations, ESG Risks, Operational Risks*) are responsible for scoring the IROs within their scope. The institutions making up the Group, including Oney, participated in workshops throughout the process, most notably as part of the validation phase.

Oney Group followed the IRO identification and scoring methodology for the purposes of this impact report. Furthermore, **we have adapted the scoring of certain sustainability-related matters in view of the specific nature of our business model.**

## 5.3 5.3 PRESENTATION OF THE DOUBLE MATERIALITY ASSESSMENT RESULTS

ESRS THEME	BPCE GROUP
<b>E1 - Climate change</b>	<b>Material</b>
E2 - Pollution	Non-material
E3 - Water and marine resources	Non-material
E4 - Biodiversity and ecosystems	Non-material
E5 - Circular economy	Non-material
<b>S1 - Own workforce</b>	<b>Material</b>
<b>S2 - Workers in the value chain</b>	<b>Material</b>
<b>S3 - Affected communities</b>	<b>Material</b>
<b>S4 - Customers and end-users</b>	<b>Material</b>
<b>C1 - Business conduct</b>	<b>Material</b>

### NON-MATERIALITY OF NATURE-RELATED ISSUES (EXCLUDING CLIMATE)

For 2024, BPCE Group considered that only the climate change mitigation and adaptation issue was material under the Environment (E) theme within the meaning given to it by the ESRS. The limitations relating to currently available market information and methodologies meant that it was not possible to characterise the materiality of Nature themes within the meaning of the ESRS, i.e. all environmental dimensions except climate (*Pollution, Water, Biodiversity and Circular Economy*), leading the group to **assess these environmental issues as being non-material**. This assessment is mainly due to the fact that there is no consensus regarding the robust methodologies developed on the themes in question, and no relevant or appropriate data that would make it possible to establish a link in terms of impact or risk for BPCE Group in these themes throughout its value chain. The materiality assessment was carried out as part of BPCE Group’s sustainability report, and identical results were achieved for Oney Group to those achieved for BPCE Group in terms of the materiality and non-materiality of the themes presented above.

In order to supplement this information at Oney Group level, the following clarifications were made regarding certain issues that were deemed essential, though not material, at BPCE Group level.

For 2024, the circular economy issue was identified as being essential for the activities of Oney Group. On an absolute basis, Oney Group can be considered to have an adverse impact on the circular economy through our financing solutions (i) **promoting the consumption of goods** (*a circular approach consists of reducing the consumption of goods and resources*) and (ii) **financing the purchase of non-circular consumer goods**. Oney Group has turned this into an opportunity by offering financing for certain products or services that contribute to the development of a circular economy. The circular economy practices integrated into our financing and insurance offering and into the manner in which we manage claims (*recycling, re-use, repair*) at Oney Group help extend the life of the assets that are financed and insured.

Given Oney Group’s specific business model, in which mostly online services are provided to individuals, the S3 - *Affected Communities* issue was not considered to be material.





## II. Contributing to the decarbonisation of the economy and the development of a circular economy

1.

SUPPORTING OUR CUSTOMERS  
IN THEIR ENVIRONMENTAL TRANSITION

2.

OUR OWN FOOTPRINT



Faced with challenges related to climate change and sustainability, **we are accelerating the adaptation of our activities** with the aim of expanding our impact solutions to all customers. We are supported in this by our two shareholders *BPCE* and *ELO*, who share the same desire to empower employees through their activities and projects to advance customers' environmental transition.



## EMPOWERING EMPLOYEES [...] TO ADVANCE THE ENVIRONMENTAL TRANSITION OF CUSTOMERS.



We have therefore included the following strategic priorities in our sustainability roadmap:

- › **Supporting all our customers in their environmental transition;**
- › **Extending our sustainable refinancing strategy, in order to have the necessary resources to achieve our goals;**
- › **Accelerating the reduction of our own footprint.**

# 1. SUPPORTING OUR CUSTOMERS IN THEIR ENVIRONMENTAL TRANSITION

The *Oney Group* offers solutions that help **reduce greenhouse gas emissions** and **develop the circular economy**.

These solutions fall into three main categories:

### ENERGY RETROFITTING

At a time when energy performance in housing is a major challenge to reduce greenhouse gas emissions and address rising energy costs and the need to harness the value of real estate assets, *Oney* and *BPCE* have teamed up with *Leroy Merlin* to combine a zero-interest energy retrofitting loan and an instalment loan to help customers afford the cost of their energy transition. **This means that as many people as possible can now access what can often be costly solutions.**

### ENERGY TRANSITION

- › The financing provided by *Oney Group* supports numerous partners in a wide range of sectors, offering end customers sustainable solutions.
- › **Financing of solar panels:** low carbon energy production;
- › **Financing of second-hand uses and refurbished products** through our partnerships with major operators in the circular economy;
- › **Replacement of household appliances with A-rated products:** reduction in electricity consumption;
- › **Sustainable forms of transport:** *Oney* has, for example, conducted campaigns in Portugal with partner *Auchan* to offer customers 10% cashback on all e-bike or scooter purchases.
- › In Poland, the Group has also developed **promotional offers** with *Decathlon* for the purchase of eco-designed products.

### CIRCULAR ECONOMY

In the past few years, *Oney Group* has been actively promoting the sustainable use of the equipment we finance. We are therefore fully embracing a circular economy policy, through the “repair” option we offer as part of our affinity insurance solution. This offer has been designed to use resources more efficiently, consume differently and reduce the impact on the environment, while boosting well-being:

By promoting the repair rather than the replacement of equipment through our insurance offer, *Oney Group* is helping to:

- › **Conserve natural resources:** The manufacture of new equipment means that more raw materials need to be extracted from the natural environment and processed, which can be costly both in terms of energy and resources. The repair of existing equipment avoids the consumption of new resources and contributes to the reduction of GHG emissions related to the manufacture and transport of products;
- › **Reduce waste:** this immediate benefit enables *Oney Group* to contribute to cutting down the quantity of waste, particularly electronic and household waste, which accounts for a very large proportion of global waste.

**This offer also extends the useful life of equipment by prioritising repairs** (59% repair rate in 2024), generating additional savings for consumers as they no longer need to purchase new items as frequently.

Lastly, repair options stimulate job creation and enhance well-being by changing our consumption habits.

*Oney Group* is also endeavouring to extend the useful life of goods by **working with partners who are specialised in the sale of second-hand goods, and providing split payment options to encourage second-hand purchases and hence advance the circular economy**. In Romania, *Oney* has donated obsolete IT equipment to our partner *Auchan* as part of a recycling solution.

## 2. OUR OWN FOOTPRINT

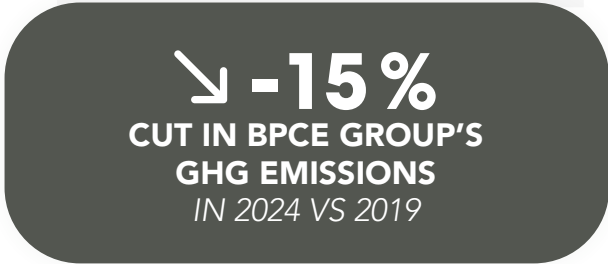
As an extension of our efforts to shrink our own footprint for several years now, the *Oney Group* has also **contributed to the achievement of BPCE Group’s greenhouse gas emissions reduction target**, i.e. -15% between 2019 and 2024.

*Oney Group* has improved the accuracy and granularity of the 2024 data collected for *Oney Bank SA* and its subsidiaries in order to **better monitor performance and take more efficient and targeted action** to reduce greenhouse gas emissions at entity level.

We also extended the scope covered in 2024.

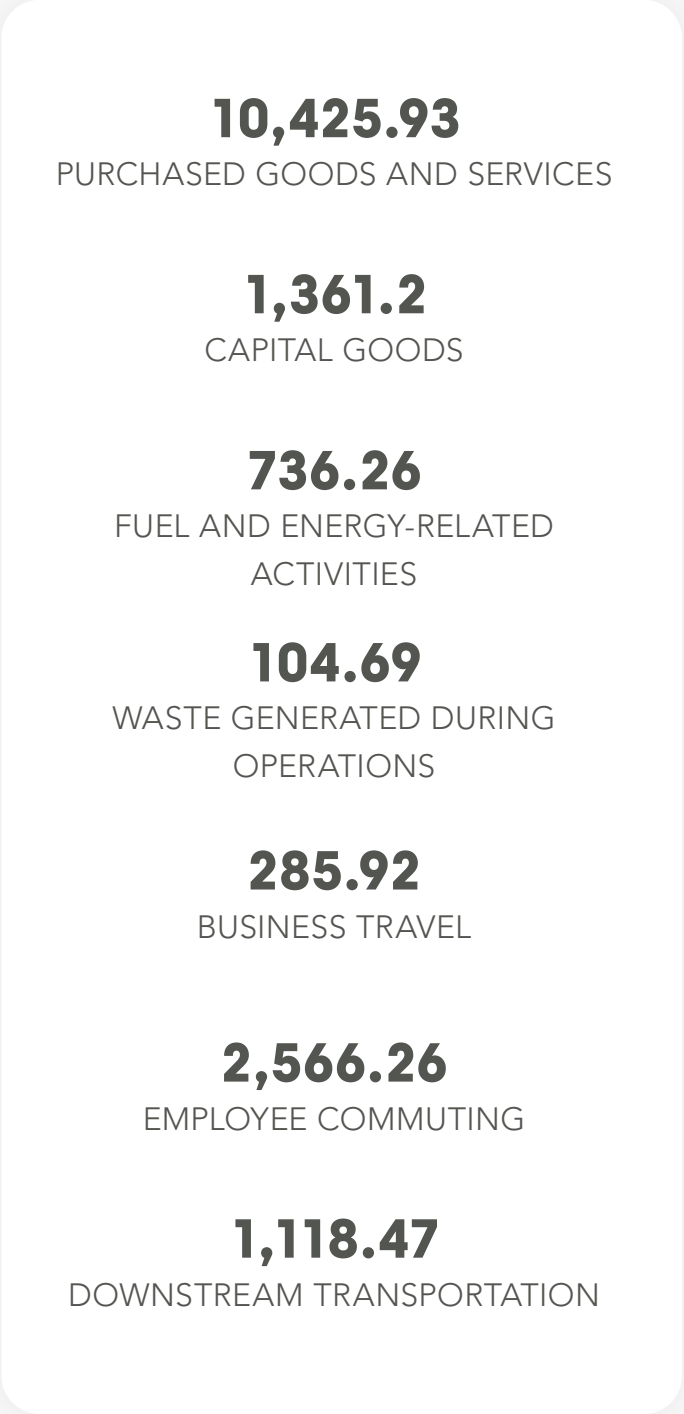
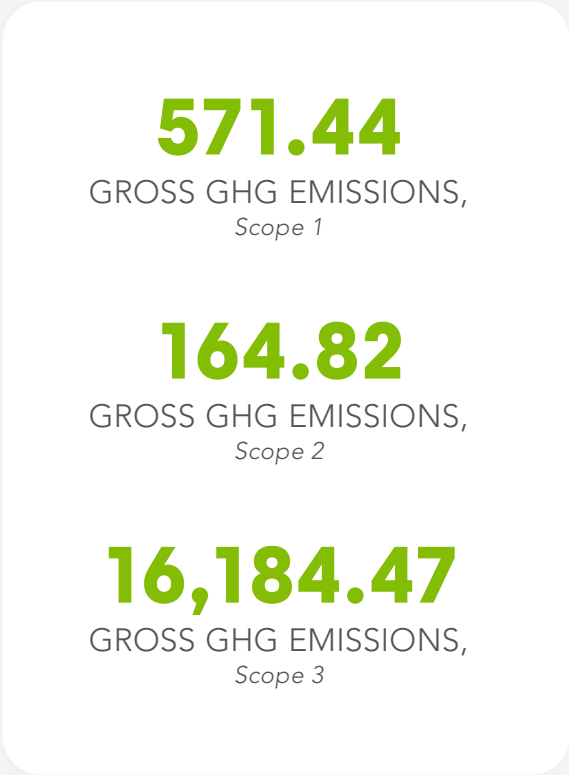
**As a result, a comparison of total GHG emissions in 2023 and total emissions in 2024 is not very relevant. Any comparison must therefore be made based on the type of impact.**

The scopes of GHG emissions calculated for our own footprint can be summarised as follows:



SCOPE 3 indirect	SCOPE 2 indirect	SCOPE 1 direct	SCOPE 3 indirect
Purchases			
Fixed assets			
Business travel	Heating and cooling systems	Natural gas and fuel oil	Customer travel
Commuting	Electricity	Fuel consumption of the vehicle fleet	Freight
Waste			
upstream	internal		downstream

*Oney Group*’s total GHG emissions came to 16,920.72 tCO<sub>2</sub>eq. at the end of 2024 for our new scope. They broke down as follows, in tCO<sub>2</sub>eq. at 31 December 2024:



**16,920.72** tCO<sub>2</sub>eq.  
TOTAL GHG EMISSIONS  
FROM OUR OWN FOOTPRINT





In order to limit the adverse impact on the climate of GHG emissions from our own operations, we are taking action in the following areas:

#### FORMS OF TRANSPORT

Oney Group is committed to **encouraging the use of more sustainable forms of transport**. The switch to a “greener” vehicle fleet is a core aspect of the Group’s strategy, involving a gradual transition to electric or hybrid vehicles.

**The car fleet at Oney Bank SA has been reduced by 9% in the past two years.**




These measures will drive a significant reduction in CO<sub>2</sub> emissions related to the Group’s vehicle fleet.

Furthermore, **employees are encouraged to commute using public transport and other sustainable forms of transport** (cycling, carpooling, etc.). In France, Oney covers 80% of the cost of public transport passes. The Group also sets aside parking spaces for employees who use carpooling or electric vehicles, as well as secure areas for bicycles. At Oney Spain, a shuttle service has been introduced to reduce the use of individual cars.

Lastly, eco-driving training courses have been introduced in Portugal for employees.

#### A “GREENER” CAR FLEET AT ONEY FRANCE, ONEY PORTUGAL AND ONEY SPAIN

##### Comparaison 2023 VS 2024

Location	% change in the fleet of internal combustion vehicles	% change in the hybrid car fleet	Change in total number of cars including EVs
	↘ -36.5%	↗ +48.6%	↘ -9%
	↘ -2.9%	↗ +12.5%	= 0%
	↘ -57.1%	↗ +20%	↘ -3.7%

Thanks to all these efforts, diesel consumption in the “travel” category fell from 496.05 tCO<sub>2</sub>eq. in 2023 to 370.97 tCO<sub>2</sub>eq. in 2024.

496.05 tCO<sub>2</sub>eq.  
IN 2023

370.97 tCO<sub>2</sub>eq.  
IN 2024



REAL ESTATE

Oney Group has reduced its own footprint in the “fixed assets” category by harnessing the following levers: **energy retrofitting and a decrease in occupied floor space.**

We have taken concrete action to reduce our energy consumption. Measures such as the installation of LED lighting systems, the ptimisation of heating, air conditioning and ventilation systems, and the closure of sites on certain winter days have enabled us to cut our consumption of electricity. **The consumption of electricity at our 10,000 sqm head office building has decreased by 30% in the past five years.**

We have made a strategic decision to use certified renewable electricity to power our sites. This enables us to support the development of renewable energies while reducing our carbon footprint. In 2024, 100% of the electricity consumed by our institutions was covered by renewable energy guarantee of origin certificates.

**An energy audit carried out in 2024 showed that the head office had reached the target set by the French tertiary sector decree six years before the 2030 deadline** (-30% relative to our baseline year).

In Spain, the Oney teams occupy a *LEED* certified building which had its certification renewed in 2024.

An energy efficiency audit has been carried out, as required by Spanish law.

Oney Group is also committed to energy-saving measures. In France, by optimising the management and closure of our premises in Croix, Tours and Paris over five days during the winter of 2024, Oney has contributed to *BPCE Group’s energy conservation target to the tune of 20,000 MWh.*

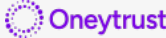

416.32 tCO<sub>2</sub>eq.  
IN 2023

397.35 tCO<sub>2</sub>eq.  
IN 2024

In Portugal, we have decided to close certain rooms at our head office every Friday and to switch off our illuminated signage at night.

Oney Group has also launched a major floor space optimisation programme. **This has already had a positive effect on our GHG emissions**, bringing them down from 416.32 tCO<sub>2</sub>eq. in 2023 to 397.35 tCO<sub>2</sub>eq. in 2024. Most of the measures to shrink floor space at our premises have been introduced at *Oneytrust*, *Oney Portugal* and *Oney Romania*, as shown in the table below:

Floor space of buildings in sqm

	2023	2024	Percentage reduction
	18,957.9	18,339.1	↘ -3.26 %
	1,200	390	↘ -67.5 %
	3,285.5	2,797.8	↘ -14.8 %
	725	700	↘ -3.4%

RESPONSIBLE PURCHASING

In 2024, *BPCE Achats & Services* held Responsible Purchasing training sessions based on ISO 20400 for buyers joining its services.

To facilitate the inclusion of CSR criteria in purchasing specifications, the Procurement function has been given access to the CSR risk mapping developed by *AFNOR (French national standardisation organisation)*, with CSR criteria adapted to purchasing categories. An action plan has also been prepared to increase the use of inclusive suppliers.

As part of the next milestone marking a 6% reduction in *BPCE Group’s* own footprint between 2023 and 2026, purchases of goods and services, which are the largest GHG emissions component in *Oney Group’s* own footprint, will be measured in greater detail **based on 16 categories of purchases instead of 2 at the moment**. This will improve the way in which the decarbonisation of purchased goods and services is managed, in conjunction with suppliers.

*Oney Group’s* responsible purchasing actions are described in more detail at the end of this report.

GREEN IT

*Oney Group* has been taking steps to optimise electronic equipment and extend the service life of hardware. In addition, in Spain, there are plans to use only refurbished or second-hand IT hardware.

602.21 tCO<sub>2</sub>eq.  
IN 2023

505.21 tCO<sub>2</sub>eq.  
IN 2024

The Group has also migrated part of the IS to the Cloud with a programme to streamline data and computer processing. **These actions have led to a decrease in GHG emissions in the computer hardware category** from 602.21 tCO<sub>2</sub>eq. in 2023 to 505.21 in 2024.

The table below shows the extent to which our computer hardware has been optimised.

Computer hardware (tCO<sub>2</sub>eq.)

Subsidiary	2023	2024	Percentage
	330.91	290.39	↘ -12.25%
	33.9	13.87	↘ -59.19%
	117.19	91.80	↘ -21.67%



A photograph of three young people (two women and one man) hugging and cheering joyfully outdoors. They are wearing athletic wear. The image is partially covered by a white text overlay.

# III. Focusing our HR policy on people, cooperation and employee well-being

1.

HUMAN RIGHTS

2.

SOCIAL DIALOGUE AND WORKING CONDITIONS

3.

EQUAL OPPORTUNITIES  
AND ANTI-DISCRIMINATION POLICY

4.

QUANTIFIED INDICATORS

5.

QUANTIFIED INDICATORS



# 1. HUMAN RIGHTS

Oney Group echoes the commitment of its shareholders (BPCE and ELO) to **respect and promote human rights**, which is one of the foundations for exercising our corporate social responsibility.

We are particularly attentive to the prevention of serious human rights violations, both in our internal operations and in terms of the risks directly related to our purchases and to our products and services.



## PROMOTING RESPECT FOR HUMAN RIGHTS IN ALL OUR ACTIVITIES.



Oney Group has adopted BPCE Group's Code of Conduct and Ethics<sup>5</sup>, which sets out the group's convictions and commitments in the form of "Principles", which include "Promoting respect for human rights in all our activities".

**We uphold the rights and respect the dignity of our employees in France and international markets through our committed and responsible human resources policy.**

The Oney Group HR policy thus focuses on people, cooperation and employee well-being. **It is based on principles of respect, trust, communication, transparency and collaboration.**

In particular, this policy:

- › Strives to create an inclusive, respectful, equal and non-discriminatory environment that promotes diversity and the well-being of our employees;
- › Provides assurances regarding the safety, quality of work life and sustainable work/life balance of our staff. It also undertakes to protect their privacy and the confidentiality of their data in accordance with the applicable regulations;
- › Fosters communication, listening, transparency and cooperation between employees;
- › Promotes the development of talent and leadership, as well as employability, career paths and career opportunities for our employees;
- › Supports the engagement, performance and retention of our employees, most particularly through the implementation of an attractive, motivating and fair compensation policy;
- › Respects the rights of our employees and considers social dialogue to be a key driver of our organisation's transformation and sustainable performance.



<sup>5</sup> <https://www.groupeBPCE.com/app/uploads/2024/02/Code-conduite-ethique-FR-2.pdf>

## 2. SOCIAL DIALOGUE AND WORKING CONDITIONS

### 2.1 SOCIAL DIALOGUE

Oney Group is committed to maintaining an open, transparent and constructive dialogue that contributes to the implementation of its strategy and the performance of its activities. This social dialogue encourages the involvement of employee representatives and staff in the roll-out of labour policies.

Social dialogue is based on regular engagement, most particularly with employee representatives and trade union organisations, which are key players in the smooth functioning of our organisation.

- › Social dialogue is reflected in the Group agreements (BPCE) that apply to the various entities, such as:
- › The 2022 agreement on employment and career path planning (GEPP);
- › The 2022 agreement on career paths for employee representatives.

Oney Group also has its own social dialogue bodies that facilitate a close relationship with employee representatives, both through works councils and collective bargaining bodies, in accordance with local legislation.

In 2024, 100% of our employees in France were covered by collective agreements. Our “social dialogue” coverage rate was 98.4%.



**SOCIAL DIALOGUE IS A KEY ELEMENT OF OUR TRANSFORMATION AND SUSTAINABLE PERFORMANCE.**



Faced with a constantly changing economic and social environment, Oney Group considers social dialogue to be a key element of its transformation and sustainable performance.

This changing environment is profoundly altering labour relations, which reinforces the need to permanently establish a transparent and constructive social dialogue, in which employee representative bodies and/or trade union organisations, where they exist, have an important role to play.

**Social dialogue encourages the involvement of employee representatives and staff in the roll-out of the labour policies established within Oney Group.** It is based on regular engagement, most particularly with employee representatives and trade union organisations, which are key players in the smooth functioning of our organisation.

IN FRANCE IN 2024

**100 %**

**OF STAFF WERE COVERED BY COLLECTIVE AGREEMENTS**

Oney Group also strongly believes that **social dialogue is forged** through day-to-day professional relations **as part of a genuine relationship built on trust.**

Managers therefore have a central role to play in maintaining a good social climate, as they are in direct and daily contact with their teams and employee representatives.

This dialogue is based on values of respect, mutual trust and transparency.

With this in mind, Oney Group is committed to ensuring that there is **no impediment to the exercise of any mandate** by an employee representative or trade union member, who must fulfil such roles in accordance with the prevailing local regulations.

At Oney Group, where local bodies exist, social dialogue mainly takes the form of:

- › **Regular briefings and information meetings** with staff representatives (‘CSE’ - works council and ‘CSSCT’ - health and safety panel) and trade unions;
- › **Regular consultations with and notifications to staff representatives** regarding strategic directions, the economic situation, labour policy and business projects;
- › **Collective agreements** with trade union organisations, some of which may be common to several Oney Group entities or specific to just some of them.

Oney Group provides a platform for the negotiation of a series of agreements and/or unilateral measures laying the foundations for our labour policy aimed at encouraging and recognising the devotion and performance of employees, particularly through the following agreements:

- › The mandatory annual collective bargaining (‘NAO’) agreement reached in 2024 for Oney Bank SA;
- › The profit-sharing agreement signed in 2024 covering the French entities (Oney Bank SA, Oneytrust and In Confidence Insurance (ICI)) belonging to Oney Group;
- › Agreements on the implementation of a company savings plan and a collective retirement savings plan, signed in 2025 and applying to the French entities of Oney Group (Oney Bank SA, Oneytrust and ICI);
- › Agreements on healthcare costs and personal protection schemes signed in 2024 at Oney Bank SA;
- › An agreement on employment and career path planning (‘GEPP’) entered into in 2022 and extended through amendments until 31 December 2025 at Oney Bank SA.

These measures are part of the HR policy. They are applied at certain subsidiaries according to local regulations and specific local characteristics.

In 2024, 58 meetings were organised with employee representative bodies (20 with the members of the CSE and/or CSSCT and 38 with the trade unions) at Oney Bank SA.

**Social dialogue and the active encouragement of employee feedback are an integral part of our HR policy.** These measures are applied in accordance with the rules and norms prevailing at each Oney Group entity.



## 2.2 COMPENSATION AND DATA PROTECTION

### COMPENSATION POLICY

Oney Group's compensation policy is structured to **encourage long-term employee commitment and enhance the Group's employer appeal**, both in France and internationally. It covers the fixed and variable compensation components, as well as the employee benefits that apply in our different countries, in accordance and in compliance with the applicable local regulations.

This policy strictly complies with the legal obligations in force at our various entities in France and abroad, both in terms of labour laws and taxation. It also incorporates appropriate risk and compliance management while encouraging employees to promote the Group's sustainable success and stability.

It reflects **the individual and collective performance of our business lines and employees**, taking care not to give rise to conflicts of interest, and promotes behaviour that is consistent with our organisation's culture and rules of good conduct.

The policy also aims to offer **levels of compensation that are competitive in comparison with our reference markets**.

The compensation policy incorporates our fundamental workplace equality and non-discrimination objectives. Oney Group is hence careful to ensure equal pay for men and women and is very attentive to the compensation of its junior and senior employees.

The compensation policy strictly complies with our legal obligations regarding labour laws and social and tax legislation.

Defined at Oney Group level, the compensation and employee benefits policy is designed and implemented in collaboration with the HR teams of our various entities and subsidiaries.

The Group HR Department ensures that the compensation policy is consistent and that it is applied in full to Oney Bank SA and its entities.

The HR Departments/Directors in each country follow the Oney Group guidelines to develop consistent compensation practices, taking into consideration appropriate external compensation levels, internal equal pay requirements and local specific characteristics and legislation.

In addition, when pay levels come up for annual review, an internal committee led by the Group HR Department ensures the overall consistency of the measures proposed by the different countries and compliance with the budget.

Mandatory annual collective bargaining meetings are held each year with the employee representative bodies on compensation issues. Employee savings schemes (*including profit-sharing and incentive schemes*) and social protection schemes (*healthcare costs; personal protection*) are governed by collective agreements negotiated with employee representatives. Lastly, **the issue of equal pay is incorporated into the agreements signed on gender equality in the workplace**.

### EMPLOYEE DATA PRIVACY

Oney Group is covered by an employee information notice issued at BPCE Group level relating to the policy on the protection of personal data. This notice provides employees with a **transparent explanation of how their personal data is processed**, as well as their rights and the procedures for exercising such rights. It is available on the Oney intranet site.

It satisfies the obligation of transparency towards data subjects regarding the use of their data.

The policy also sets out expectations regarding employee training on compliance with the GDPR (*General Data Protection Regulation*).

Furthermore, Oney Group relies on BPCE Group's HRIS (*Human Resources Information System*) for recruitment, training and talent management.

Lastly, internal rules of procedure stipulate the rules and obligations applying to Oney Bank SA's employees and service providers regarding the use of data.

We hold mandatory annual training sessions for all employees and service providers to **ensure they understand their rights and obligations** (GDPR, etc.).



### INTRODUCTION OF MEASURES TO IMPROVE EMPLOYEES' WORKING CONDITIONS.



## 2.3 QUALITY OF LIFE AND WORKING CONDITIONS

Oney Group is committed to the well-being of its employees and **will make every effort to create conditions that are conducive to the establishment of a working environment that meets their expectations and guarantees their safety, as well as their physical and moral integrity**.

Oney Group is therefore particularly attentive to working conditions and leads a policy of preventing occupational risks and promoting health and safety in the workplace. As such, all employees at our various entities are given access to sports activities or benefit from actions in favour of Quality of Life and Working Conditions.

**Oney Group promotes a sustainable work/life balance** by monitoring, among other things, the workload of employees and ensuring that rest periods and working hours are respected, as well as employees' right to disconnect.

Lastly, employees and managers complete regular training regarding the legal obligations in this area, hybrid management and remote working rules.

Oney Group is committed to pursuing a proactive and concrete QLWC (*Quality of Life and Working Conditions*) policy, reflected in the introduction of measures to improve employees' working conditions. This policy contributes directly to the well-being and satisfaction of our employees and to a reduction in psychosocial risks.

It has four dimensions:

- › **Well-being at work:** measures to promote well-being and work/life balance (*right to disconnect, parenthood, plan to promote healthy living and tackle sedentary lifestyles, support for employees who are carers*);
- › **Quality of employee relations and management:** management based on trust that empowers employees and helps them grow;
- › **Working environment:** a working environment that facilitates efficiency and collaboration, supporting new organisational methods such as hybrid work;
- › **Support for change** by engaging employees in change while preventing the emergence of psychosocial risks

An agreement on gender equality in the workplace and QLWC has been in place since 2021 at *Oney Bank SA*. This agreement prioritises prevention, the anticipation of difficulties and the continuous improvement of work situations. It places a particular emphasis on:

- › Well-being and health and safety at work;
- › The right of expression (*employee engagement surveys, etc.*);
- › Work/life balance and parental and/or social responsibility (*carers*);
- › The prevention of various occupational risks (*psychological harassment, burn-out*).

**An employee feedback mechanism** is in place at all *Oney Group* entities to ensure that the measures implemented are effective and to adapt action plans to the needs expressed by employees. This includes regular engagement surveys. The results of these surveys are systematically shared with the teams and the implementation of dedicated action plans is closely monitored.

To help employees reconcile work and their personal lives, *Oney Bank SA* is committed to a parenthood policy that creates a supportive environment for employees who have young children (*adapting working conditions and working hours, helping with childcare, taking family circumstances into consideration, particularly where an employee is a single parent*). All the measures proposed to staff are included in **a guide for parents** available to all employees.

*Oney Bank SA* also has measures in place **to support employees who need to care for a loved-one**.

These measures include: flexible working hours, regular awareness-raising initiatives, information on the support systems available on a national level and within *Oney* and on the existence of an internally-led community of carers.



### ONEY GROUP IS PARTICULARLY CONCERNED ABOUT THE HEALTH OF ITS EMPLOYEES.



*Oney Group* is particularly concerned about the health of its employees and, as such, regularly stages **public health actions** through workshops and conferences on the following themes: sleep, nutrition, physical activity and cardiovascular risk. *Oney Group* has also been involved in cancer prevention for a long time. This has seen us partner the French Cancer League and introduce a specific mechanism to facilitate the return to work. *Oney Group* contributes to public health-related prevention policies, most notably by participating in national prevention campaigns, such as flu and COVID vaccination campaigns, as well as in blood donation campaigns organised outside our organisation, during working hours.

Lastly, *Oney Group* facilitates and encourages regular physical activity with a positive impact on physical and mental health, by giving employees an opportunity to take part in sports several times a week through **our company sports club**.

## 2.4 RISK PREVENTION AND WORKPLACE SAFETY

*Oney Bank SA* is careful to take preventive measures to ensure the physical, mental and social safety of employees. These measures are taken at three levels:

- › **First-level prevention**, which occurs when a risk has not yet materialised: this involves mitigating, or doing completely away with, the chances of the risk actually occurring;
- › **Second-level prevention**, which consists of reducing the effects or spread of a risk when it is identified (e.g. protective measures, training actions, support for employees during projects);
- › **Third-level prevention**, or curative prevention, which aims to support vulnerable employees (*handling difficult group or individual situations*) with a view to limiting damage, preventing complications and recurrence.

An occupational risk prevention approach is taken at *Oney Bank SA* and involves all the relevant stakeholders, most notably employee representative bodies, the Human Resources Department and occupational health services.

This approach consists in identifying occupational risks within our organisation's various activities. It involves implementing and updating, in collaboration with the CSSCT, a comprehensive occupational risk assessment document (*'DUERP'*) and an annual programme for the prevention of occupational risks and improvement of working conditions (*'PAPRI Pact'*). These documents inventory and rank identified risks and are valuable tools in the prevention of occupational risks. The fact that everyone can access them, and that they are routinely updated when an event occurs or there is a significant change in health and safety conditions or working conditions (*human, technical or organisational transformation*) provides strong assurances as to the effectiveness of our risk prevention approach.

A multi-dimensional action plan is drawn up for each identified risk:

- › The organisation of activities and tasks;
- › Training;
- › Managerial support;
- › Workstation ergonomics;
- › And individual circumstances.

The actions undertaken are assessed to determine their effectiveness.

The *Oney Bank SA* CSSCT meets every quarter. A report and action plan are presented each year to the works council (*CSE*).

Measures have been introduced to prevent and monitor **anti-social behaviour and customer aggression** in the workplace, during travel or through digital or other means of communication. An annual overview of anti-social behaviour and customer aggression is prepared for the sector. The action plan includes measures to combat anti-social behaviour such as regularly raising employee awareness of the risk of such behaviour and providing a tool for reporting and dealing with it.

Our approach to psychosocial risks involves analysing the situation with the stakeholders and drawing up a targeted action plan. There is a specific support system for employees. A social worker and/or psychological support will be provided if needed. **A free 24-hour anonymous hotline is also available.**

*Oney* has a psychosocial risk prevention plan that includes raising awareness and training all employees, as well as informing them about the role of prevention-related stakeholders: occupational health service, nurse, social worker, Human Resources Business Partner (*HRBP*) and staff representatives.



### ONEY PAYS CLOSE ATTENTION TO EMPLOYEE WORKLOAD.



To prevent occupational risks, *Oney* pays close attention to employee workload. Regular workload reviews are conducted to identify any risks and set in motion a dedicated action plan if needed.



### 3. EQUAL OPPORTUNITIES AND ANTI-DISCRIMINATION POLICY

Oney Group pursues an Inclusion and Diversity policy that is consistent with our culture and with our family and mutualist values.



#### BUILD AN EVER MORE RESPECTFUL AND INCLUSIVE WORK ENVIRONMENT.



Our aim is to build an ever more respectful and inclusive working environment that **capitalises on the diversity of our workforce** and enables everyone to be heard, valued and have an impact. We want to give talents from all backgrounds the same opportunities, regardless of their age, origin, gender, orientation, gender identity or disability.

- › These commitments have been materialised in two agreements:
- › An agreement on **employment and career path planning** ('GEPP') at Oney Bank SA, which has been extended by several amendments until 31 December 2025;
- › An agreement on **gender equality in the workplace and QLWC** at Oney Bank SA.

This policy is divided into two areas:

- › Gender equality in the workplace and measures to combat all forms of discrimination;
- › Inclusion and diversity.

#### 3.1 GENDER DIVERSITY AND GENDER EQUALITY

Our policy on gender diversity and gender equality in the workplace has been structured for many years around three areas:

- › **The representation of women** in all business lines at all levels of responsibility;
- › **Equal pay;**
- › **Combating sexism and sexual harassment.**

##### RECRUITMENT

Oney Group guarantees **equal opportunities for all applicants as well as non-discrimination in hiring** through the following actions:

- › All recruitment interviews are identical and any questions that may prove to be discriminatory are prohibited;
- › Wherever possible, at least one male candidate and one female applicant must be interviewed for the same position;
- › Non-discrimination training is in place for managers involved in hiring processes and for HR staff.







## PROMOTIONS AND TRAINING

Oney Group ensures that women and men are treated equally when it comes to access to promotions and training by:

- › Defining professional development criteria based **solely on the recognition of skills, experience and individual contribution.**
- › Ensuring that part-time work and parental leave do not penalise employees in their professional development and access to training.

## WORK/LIFE BALANCE

**Oney Group wants to ensure that employees can strike the best possible balance between their personal lives and their work by:**

- › Facilitating part-time work for all;
- › Communicating and allowing flexibility in the application of rules relating to leave for family events;
- › Ensuring compliance with the right to disconnect, through a specific charter.

## PAY

**Oney Group guarantees equal pay for women and men for the same work, career and skills.** During annual pay reviews, we ensure that men and women are treated equally and, if necessary, we gradually correct any differences.

Like all companies belonging to *BPCE Group*, *Oney Group* ensures that women are represented in senior management and on our governing bodies, and we have set a target that exceeds the 30% required under France's "Rixain Law" from March 2026.

At 31 December 2024, women made up 40% of the members of senior management (*French scope*).

In 2024, the gender pay gap stood at 2.8% (*French scope*).

*Oney Bank SA* scored 92/100 in workplace gender equality in 2024.

*Oney Group* has a Diversity Officer who is a key point of contact for employees. This officer is tasked with driving, leading and coordinating the implementation of our Diversity policy. They deploy our training policies, steer key indicators and relay tools and key moments to employees.

## 3.2 DISABILITY

*Oney Group* has long been involved in promoting the inclusion of people with a disability and their continued employment.

Our Disability policy covers the following main areas:

- › **Maintaining employment:** thanks to the implementation of actions to detect disability situations as early as possible, we can adapt working conditions and tools to a person's disability, in order to keep them in their jobs. We also ensure that employees with a disability can benefit from the same career development prospects as any other employee, in line with their ambitions, their skills and the opportunities offered, without allowing their disability to become a barrier;
- › **Recruitment and integration:** there is a major gap in the labour market between people with a disability and the rest of the population. With this in mind, our Disability policy aims to promote the acquisition of professional qualifications by people with a disability and to seek out and support the integration of applicants with a disability;
- › **Changing perceptions to improve inclusion:** we are committed to promoting disability awareness and inclusion;
- › **Support for the sheltered employment sector** via a proactive purchasing policy by committing to use the services of sheltered employment structures (*disability-inclusive companies ('EA'), vocational rehabilitation centres (ESAT) and disabled self-employed people*) to support the external employment of people with a disability who are unable to work in a standard work environment.

At *Oney Group*, a **disability officer** supports people with a disability throughout their career with us (*recruitment, onboarding, training, retention in employment, support in having their disability officially recognised, etc.*) in conjunction with our HRBPs, managers and the occupational health services.



**RAISING AWARENESS AND CHANGING PERCEPTIONS OF SOMETIMES LITTLE-KNOWN DISABILITIES.**



In 2024, during European Disability Rights Week, awareness-raising workshops on invisible disabilities were held using virtual reality. **All employees were invited to take part to better understand and change perceptions of these sometimes little-known disabilities.**

Through this policy, people with a disability at *Oney Bank SA* accounted for 6.76% of the workforce in 2024, which is above the mandatory level of 6%.

**40 %**

**OF SENIOR MANAGERS WERE WOMEN**

AT 31 DECEMBER 2024

**92/100**

**GENDER EQUALITY SCORE**

IN 2024

**2.8 %**

**GENDER PAY GAP**

IN 2024





### 3.3 3.3 COMBATING DISCRIMINATION AND HARASSMENT

In order to provide our employees with a *respectful and safe working environment*, in which each and every individual can express their skills and potential, the *Oney Group* Inclusion and Diversity policy is supported by HR measures to combat discrimination and harassment.

Several types of measures are geared towards employees:

- › **Guides and communication campaigns** that raise employee awareness about all forms of discrimination, such as sexism or racism;
- › **Training** to understand what inclusion is and how, beyond the policies put in place, all employees can participate in inclusion;
- › **Specific training courses** to enable employees to recognise and combat the different types of discrimination and harassment.

*Oney Group* has appointed various officers to implement these measures and be attentive to the needs of its employees:

- › **A HR harassment officer:** in accordance with the law in force, this person's role is to guide, inform and support employees in order to combat sexual harassment and sexist behaviour;
- › **A CSE officer** is appointed within the CSE department and is also involved in combatting sexual harassment and sexist behaviour.

In 2024, training was rolled out to managers and the Human Resources teams, and all employees were invited to complete an e-learning module.

**Awareness-raising workshops** were also run by the harassment and CSE officers.

*Oney Group* is committed to ensuring that all the decisions that are taken in relation to human resources management during an employee's career path (*from the time they join our organisation until they leave*) comply with these principles.



# 4. PROVIDING A GREAT PLACE TO WORK AND DEVELOPING SKILLS

## 4.1 PROVIDING A GREAT PLACE TO WORK

### RECRUITMENT AND OUR EMPLOYER BRAND

We understand that our employees are our most valuable asset in making our collective project a success, which is why we focus our recruitment policy on:

- › **Attracting the best talent**, in line with our values, corporate culture and strategic ambition;
- › **Promoting equal opportunities**, diversity in our recruitment profiles and inclusion, as part of a pledge to never discriminate based origin, nationality, religion, gender, age or any other unlawful criteria;
- › **Hiring based on hard skills and soft skills**, using fair and transparent selection processes.

Oney offers applicants a unique experience, by creating a bond and engaging with them from the very beginning of the recruitment process:

- › **Digital onboarding** means that new hires can keep informed and connected with the group even before their first day on the job;
- › **A corporate culture** focused on authenticity, cooperation and team spirit helps to retain talent over the long term.

The Oney Group recruitment process enables applicants to join an organisation that will provide them with the right level of professional support, with the possibility of moving up through the ranks at Oney Group, BPCE Group or ELO.

Oney Group develops an employer image based on three pillars:

- › **Putting employees front and centre** by giving them a voice and thereby providing them with an opportunity to fully embody our messages;
- › **Conducting communication campaigns** to promote our professions and support our recruitment programmes;
- › **Promoting all our commitments in the area of inclusion** (gender diversity, disability, and cultural and social diversity) through dedicated communication actions.

To promote equal opportunities, our recruitment pathways hinge solely on identifying hard skills and soft skills. Gender equality in the workplace and the development of a diverse workforce are principles that are embedded in our talent acquisition processes.

Oney Group is active on a number of job boards and specialised media channels. **The aim is to significantly develop our reputation and image by showcasing our corporate culture, professions and job opportunities.**



### BOOSTING OUR EMPLOYER BRAND AMONG YOUNG TALENT, GIVEN HOW IMPORTANT THIS NEW GENERATION IS FOR THE FUTURE OF OUR GROUP.



We are firmly committed to boosting our employer brand among young talent, given how important this new generation is for the future of our group.

Oney Group has a dedicated strategy to attract, develop and recruit young professionals. Oney Bank SA hosts nearly 70 work-study trainees each year and, in 2024, more than 35 young people under the age of 30 joined the company on a permanent contract. Lastly, Oney Bank SA is committed to hosting interns and welcomed in 2024 a first group of 19 students in their first year of high school.

### ONBOARDING NEW HIRES

Oney Group has an extensive three-year onboarding and support programme for new entrants.

We are committed to providing a welcoming environment for new employees and we take concrete action to prepare for and support their arrival. This involves a number of milestones:

- › **A pre-boarding** process to prepare new employees for their arrival, keep in touch with them and provide them with information on their future environment (*history of the group, HR policies, etc.*) in a variety of fluid and fun formats;
- › **On arrival**, employees follow a structured multi-step onboarding process that involves welcome sessions and meetings with the team and key stakeholders;
- › New employees are **closely monitored** during their first months with the group, through regular interviews with their manager and the head of HR;
- › Existing employees are encouraged to act as **sponsors** in order to provide guidance to new hires in a less formal way.



**~70**  
WORK-STUDY  
TRAINEES

EACH YEAR

**35**  
YOUNG PEOPLE  
(UNDER 30) HIRED  
ON PERMANENT  
CONTRACTS

IN 2024

**19**  
HIGH SCHOOL  
INTERNS

IN 2024



## EMPLOYEE RETENTION

Oney Group wants to attract, recruit and retain talent and make these employees ambassadors for the Group by:

- › Providing them with talent acquisition and onboarding opportunities that facilitate their development and help set them apart;
- › Developing their employability, particularly through training and the transmission of knowledge and know-how;
- › Facilitating their career paths and career moves.

**We constantly endeavour to provide an employee experience of the highest standard at all milestones in a career.**

Each employee plays an active role in their employability and is aware of the importance of constantly improving their professional knowledge and skills. With this in mind, Oney is committed to developing talent and supporting their professional development by offering career prospects that are both motivating and realistic.



**ONEY ENCOURAGES ITS EMPLOYEES TO EMBARK ON DIVERSIFIED CAREER PATHS.**



In a world that is undergoing a profound transformation, Oney encourages its employees to embark on diversified career paths and facilitates cross-disciplinary skills and internal career moves.

Career gateways are opened and the development of employability is a priority.

Annual “people reviews” are organised with managers and HR teams at our French and international entities. Through these reviews, we are able to identify back-ups, potential changes and career move ambitions, and help employees visualise where they can take their professional development over the short and medium term.

Action plans are shaped to provide **personalised support to employees, adapted to their needs.**



## EMPLOYEE FEEDBACK MEASURES

Oney Group has specific feedback measures in place to conduct ad hoc surveys:

- › **At key milestones for employees:** targeted surveys are conducted at key moments in employees’ career paths, leading to the implementation of specific action plans;
- › **A regular feedback process** was introduced in 2018 to touch base with employees via short surveys and provide the most suitable response to their expectations;
- › All our feedback measures **incorporate a number of open-ended questions** so that employees can voice any concerns they may have. This also encourages more spontaneous proposals to identify levers for speeding up the necessary transformations.

## AMBASSADORS

**Oney Group employees are regularly asked to represent our organisation on social media:** to showcase their professions, show what happens behind the scenes and shine a spotlight on our commitments. Employees are also encouraged to submit a review of the Group on recruitment platforms, such as Glassdoor and Indeed.

Employees can also be stakeholders in hiring by:

- › Participating in initiatives with schools to promote certain professions;
- › Co-opting candidates for positions within our organisation.

**Oney Group encourages employees to become ambassadors or to participate in employee referrals, another powerful engagement driver.**



## 4.2 DEVELOPING SKILLS

At Oney Group, we invest in the long-term employability of our staff by offering them an opportunity to acquire experience in new areas through rewarding career opportunities and continuous upskilling.

In a constantly changing environment, we also strive **to develop potential and leadership to ensure we always have suitable candidates for key positions in our organisation** and are able to deliver on our commitments, particularly when it comes to diversity and inclusion.

**Amid rapid changes in our businesses, upskilling is a priority focus in our HR strategy.** This involves:

- › Anticipating changes and supporting transformation;
- › Identifying key skills for the future and building targeted development plans;
- › Supporting technological, organisational and HR transformations: automation, digitalisation, artificial intelligence;
- › Preparing our teams for change through training, adapted tools and structured support.

**Be a pro-learning organisation. The aim is to make Oney a “Human Centric” organisation that puts employees front and centre in its development programmes:**

- › Assessing individual and collective performance to adjust development plans;
- › Proposing a diversified development offer: training programmes, workshops, mentoring, coaching, etc.;
- › Encouraging the transmission of knowledge: communities of “Expert Leaders” are trained to pass on their knowledge and support staff upskilling.

**Promote career paths and internal career moves. There is a wealth of diversity at Oney when it comes to career paths:**

- › We use “people reviews” to identify potential, determine development prospects and build personalised support plans;
- › We promote internal career moves as part of a cross-disciplinary focus, both within Oney Bank SA and within the Group and its partner entities;
- › We ensure that all our career opportunity processes are transparent to encourage employees to be committed and proactive when tracing their career path.



### ONEY HELPS EMPLOYEES DEVELOP THEIR SKILLS.



An employment and career path planning (“GEPP”) agreement has been signed at Oney Bank SA to help employees to develop their skills.

The Group anticipates foreseeable changes in business lines in order to support our organisation’s new strategic directions and boost staff employability.

This policy is expressed through a group employment and career path planning (“GEPP”) agreement signed in July 2022, which contains a common set of policies and practices.

The agreement is consistent with branch and company agreements entered into within the group in the areas of vocational training, gender equality in the workplace and quality of life at work, in accordance with vocational training legislation in France.

The main objectives of our skills development policy fall into four main categories:

- › **Promoting the professional integration of young people;**
- › **Encouraging career opportunities and supporting the transformation of professions;**
- › **Raising awareness about impact;**
- › **Developing a positive AI culture.**

The identification of future skills is based on a number of studies, such as those carried out annually by job trend/qualification watch units (“Observatoires des métiers des qualifications”), which provide an informed view of current or future developments and the impacts of these changes on organisations, employment and skills.

### CAREER OPPORTUNITIES AND CHANGING PROFESSIONS

To facilitate and support the professional development of our employees, we rely on:

- › **Tools developed at group level:** digital platforms and internal job offers to find out about professions and identify opportunities; personalised workshops and support to build career plans and prepare for interviews; continuing professional training programmes to develop skills and thus enhance their employability;
- › **Training or certification programmes.**

To support the transformation of professions, a dedicated programme prepares employees for the skills they will need in the future and encourages them to maintain their skills, develop them and progress in their profession.

Through our job trends watch unit, Oney Bank SA has identified professions that are undergoing a transformation and require support as part of its skills development plan. Change management training has also been put in place for employees and managers.

The Tech & Digital Campus has taken on a more extensive role and a positive AI culture is being developed at Oney.

The Tech & Digital Campus is designed to support upskilling by offering pathways, with specialisations by profession and profile (*employee, expert, manager and people involved in the transformation programme*), **so that each employee has the appropriate level of knowledge for the group’s AI transformation.**

We have built our training offer around nine strategic skills: user experience, agility at scale, competence of Product Owners (*IT project managers*), service quality, green IT, data, technology and innovation, IS security and devOps.

We have introduced measures to enable our employees to take ownership of Data and AI technologies, frameworks and tools. One such measure has involved **setting up a community of ambassador employees** aimed at deploying AI among all staff.

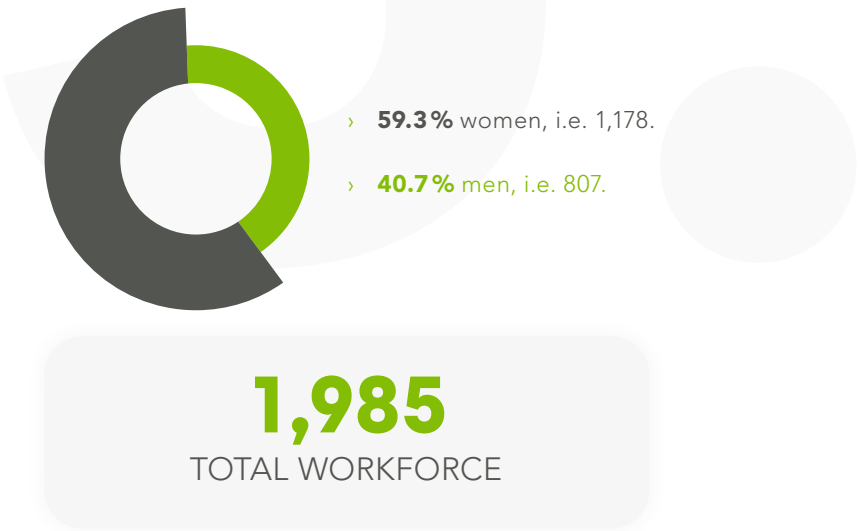


5. QUANTIFIED INDICATORS

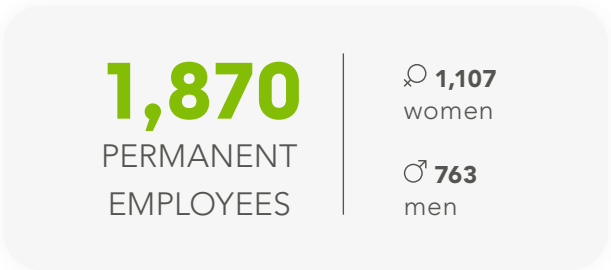
5.1 PROFILE OF OUR WORKFORCE

GENDER BREAKDOWN OF REGISTERED EMPLOYEES AT 31 DECEMBER 2024 AT ONEY GROUP

There were 1,730 employees in the countries in which we have a workforce of at least 50 people representing at least 10% of our total workforce (France, Spain and Portugal).



NUMBER OF PERMANENT/TEMPORARY EMPLOYEES AND FULL-TIME/PART-TIME EMPLOYEES BROKEN DOWN BY GENDER AT 31 DECEMBER 2024 FOR THE ONEY GROUP

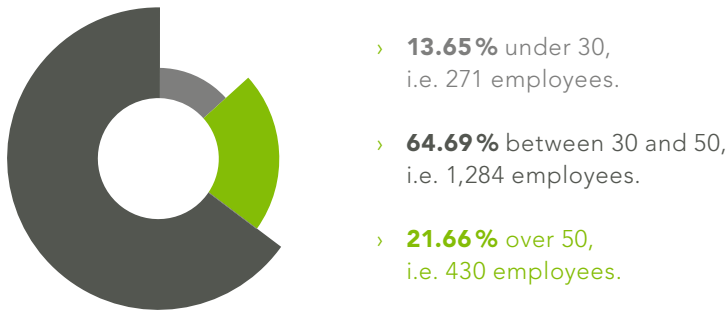


NUMBER OF HIRES, EXIT RATE/TURNOVER RATE AT 31 DECEMBER 2024

Number of hires in 2024 (Oney Bank SA):

105 permanent workers and 10 fixed-term workers, i.e. 115 in total (excluding work-study contracts and stand-ins for employees on holiday).

In 2024, the exit rate stood at **12.25%** and the turnover rate at **11.3%** at Oney Bank SA.



5.2 HEALTH AND SAFETY

At 31 December 2024 for Oney Bank SA.





A woman with short brown hair and glasses, wearing a blue button-down shirt, is speaking and gesturing with her right hand. She is in the foreground, facing slightly to the left. In the background, a blurred audience of people is seated in rows, suggesting a conference or seminar setting.

# IV. Workers in the value chain

1.

HUMAN RIGHTS

2.

SOCIAL DIALOGUE AND WORKING CONDITIONS



This chapter focuses on the rights of workers in the *Oney Group* value chain, and encompasses purchasing and partner retailers.

With regard to Purchasing, *Oney Group* has entrusted key purchases to *BPCE Achats & Services* (annual amount exceeding €50k before VAT for *Oney Bank SA*, and €150k before VAT for its foreign subsidiaries in Malta, Portugal, Spain, Poland and Romania).

Purchases of a lower amount are completed at *Oney Group* level in keeping with the procedures followed at *BPCE Achats & Services*. Some of the Group's suppliers may originate from a commercial relationship with *Association Familiale Mulliez (AFM)* while complying with *BPCE Achats* rules.

## 1. HUMAN RIGHTS

*Oney Group* is constantly engaging with suppliers, both through *BPCE Achats & Services* and also directly through its employees.

We expect our suppliers and subcontractors to apply the United Nations Guiding Principles on Business and Human Rights, which include banning the use of forced labour, doing away with child labour, refraining from discrimination, and respecting health and safety. We also expect them to comply with all the laws, regulations and guidelines in force in the countries in which they operate in terms of working hours and rest time. These commitments are set out in a Responsible Purchasing charter that we include in our tender documents, as well as in contractual clauses.

This is a material issue for *Oney Group*, both in terms of the potential adverse impacts on the employees of our suppliers and subcontractors, and in terms of the reputational risk for the Group.

**We take great care to ensure that our purchases and supplies are managed in such a way as to limit the risk of serious human rights violations.**

Additionally, as a consumer credit bank, ***Oney Group* engages with many partners and business introducers** (retailers, *AFM*, *Payment Service Providers (PSPs)*). As part of this collaboration, these entities also agree, via clauses and throughout our contract with them, to comply with all current and future regulations applying to them and to ensure that their subcontractors do likewise. These regulations may relate to fundamental freedoms and rights, the health and safety of people, and social, labour or environmental issues, and they may derive from agreements (company or branch agreements, collective agreements) or from national, European or international provisions.





## 2. SOCIAL DIALOGUE AND WORKING CONDITIONS

### 2.1 COMMITMENTS RELATED TO WORKERS IN THE VALUE CHAIN

Our commitments towards value chain workers are applied via the *BPCE Achats & Services* Responsible Purchasing policy. This policy, aimed at suppliers and subcontractors with which the group does business, includes broad guidelines relating to CSR and hence purchasing. It applies to all group institutions, which are free to apply their own policy within their own scope. This Responsible Purchasing Policy was introduced in 2021 after being approved by the *BPCE Achats & Services* board representing the companies making up the group (next updated earmarked for 2025) and is available on *BPCE Group's* website.

It embraces the commitments of the United Nations Global Compact and adheres to its “*Ten Principles*”, including the two human rights related principles:

› **Supporting and respecting the protection of internationally proclaimed human rights.**

This responsibility relates to internationally-recognised human rights as stipulated in the Universal Declaration of Human Rights, and the principles set out in the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work;

- › **Making sure we are not complicit in human rights abuses.** *BPCE Group* is also committed to following the United Nations Guiding Principles on Business and Human Rights defined as part of the UN’s Protect, Respect and Remedy framework. These group convictions and commitments have been set out in the *Oney Group* Code of Ethics.

*BPCE Achats & Services* systematically incorporates clauses into its contracts aimed at ensuring that its subcontractors comply with all regulations relating to fundamental rights and freedoms.

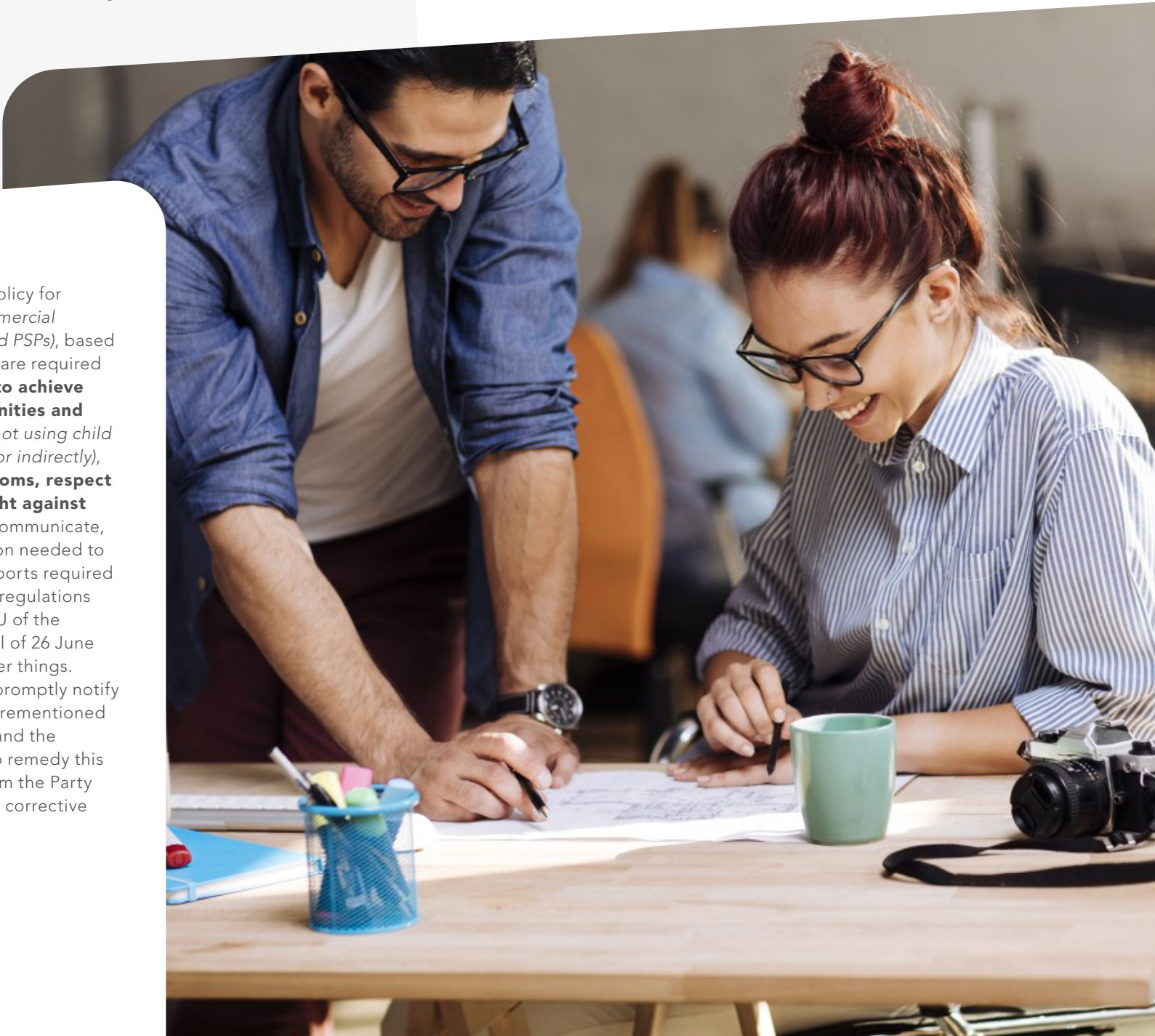
*Oney Group* follows the *BPCE Group* policy for workers employed by its partners (commercial partners, business introducers, AFM and PSPs), based on partner-related clauses. The Parties are required to develop and **implement measures to achieve objectives relating to equal opportunities and working conditions** (most notably by not using child labour or forced labour, either directly or indirectly), **human rights and fundamental freedoms, respect for democratic principles and the fight against corruption**. The Parties also agree to communicate, as soon as they are asked, all information needed to prepare the corporate sustainability reports required by applicable French and international regulations such as Directive (amended) 2013/34/EU of the European Parliament and of the Council of 26 June 2013, covering social issues among other things. Each of the Parties also undertakes to promptly notify the other Party of any breach of the aforementioned rules of which it might become aware, and the latter shall use all appropriate means to remedy this breach as soon as possible and to inform the Party that has reported the breach about any corrective actions taken.

### 2.2 DIALOGUE WITH WORKERS IN THE VALUE CHAIN

*BPCE Achats & Services* holds regular meetings with the group’s strategic and important suppliers (which are mainly defined as such based on purchase volumes and criticality).

As part of this, an independent, internal *BPCE Achats & Services* “*Supplier Ombudsman*” has been appointed to assist in the management of any disputes that may arise.

Similarly, *Oney Group* is constantly engaging with business introducers (partners, *BPCE*, AFM, PSPs and merchants).



**PROTECT, RESPECT  
AND REMEDY.**





## 2.3 REPARATION FOR HARM CAUSED TO VALUE CHAIN WORKERS AND CHANNELS FOR THEM TO ENFORCE THEIR RIGHTS

Oney Group has a platform for collecting reports relating to serious breaches of the Code of Conduct or of a law, violations of safety measures or any inappropriate behaviour in the workplace. This whistleblowing facility is open to all employees as well as to third parties of our organisation, who can report incidents by email, regardless of the country in which they are located or the business line.

As part of the prevention of potential adverse impacts, Oney Group has **set up a risk control system** via *BPCE Achats & Services* to ensure that it meets its due diligence obligations, with a view to identifying, preventing and remedying any adverse impacts relating to human rights and environmental issues. *BPCE Achats & Services* has teamed up with three other banking groups to develop a CSR risk map as part of a market approach led by the banking sector and AFNOR. *BPCE Achats & Services* has implemented a prevention and control system in accordance with European Banking Authority (EBA) regulations and factoring in the specific characteristics of purchases and all other applicable regulations (*due diligence, anti-corruption, labour law, etc.*).

**The CSR risk map is used to identify, rank and prioritise, by purchasing category, the CSR risks to be monitored in dealings with suppliers.**

It also takes into account the risk associated with the country in which most of the added value of a product or service is generated. The risk map is updated as and when is necessary.

The level of risk for each purchase category is assessed in three areas covering the following issues:

- › **Fair business practices and ethics:** fraud and corruption, protection of personal data, property rights and patents;
- › **Human rights and employment conditions:** child labour, forced labour and modern slavery, discrimination, health and safety, working conditions and the freedom to join or form a trade union;
- › **Environment:** climate change and greenhouse gas emissions, harm to biodiversity, depletion of natural resources, pollution, waste and end-of-life management.

Each purchasing category is assessed on a **CSR risk scale of 1 to 4:** low, limited, high, very high. Specific mitigation measures have been developed based on this risk assessment work:

- › In 2024, *BPCE Achats & Services* acquired a supplementary module that interlocks with the CSR risk map. With this *AFNOR* module, specific criteria can be integrated into specifications in order to mitigate risks according to the purchasing category;
- › A specific system has been put on place **for high-risk and very high-risk categories:** suppliers must respond to a specific questionnaire for each category and disclose the actions they have taken to mitigate risks and prevent serious breaches. This action plan, assessed by *BPCE Achats & Services*, generates a score that is integrated into the supplier's overall rating. Depending on the results, a progress plan can be drawn up and must be reviewed. For Oney subsidiaries in markets outside France, *BPCE Achats & Services* has measures in place, among other things, to raise awareness about supplier assessment on issues relating to the environment, human capital and ethical business via the CSR questionnaire.
- › We are gradually implementing CSR requirements into our tender documents **for the other purchasing categories**, including the gradual dissemination of best practice and the roll-out of training. A collective CSR audit process has been initiated with a few large banks in the market. The aim is to ensure that suppliers are delivering on their CSR commitments.





# V. An inclusive bank



1.

CUSTOMER SATISFACTION IS A CORE CONCERN

2.

PROVIDING SOLUTIONS  
TO AS MANY PEOPLE AS POSSIBLE

3.

PROTECTING OUR CUSTOMERS' INTERESTS



At Oney Group, the fair treatment of our customers is a fundamental principle. **By following rules of good conduct, we are able to ensure that we do business honestly, fairly and professionally in the interests of our customers.**

Our convictions and commitments in this area are described in our Code of Conduct and Ethics (see chapter VI “Ethics and responsibility” section 1.1 “Promoting an ethical culture”). Among the 12 principles listed in the code, it is our responsibility as a company to:

- › Ensure that our customers are treated fairly (Principle 2);
- › Protect the interests of our customers (Principle 3);
- › Communicate transparently (Principle 4);
- › Be an inclusive banking group that is open to everyone (Principle 10).

As a Group, we apply these principles in all our entities and therefore in all the countries in which we operate. This helps to ensure **that our customers are treated consistently**, particularly in our cross-border activities.

# 1. CUSTOMER SATISFACTION IS A CORE CONCERN

## 1.1 MEASURING CUSTOMER SATISFACTION

As part of its 2024-2027 development plan, Oney Group is committed to adopting **a resolutely customer-centric approach**. This commitment stems from the need to listen carefully to the needs and expectations of our customers. This has led Oney Group to adopt a 360° customer feedback approach, with:

- › **A broader geographical scope:** including not only France, but also the other countries in which Oney is present;
- › **Multiple targets:** encompassing both end customers and partners;

- › **Varied and interlocking methodologies;**
- › **Adapted metrics:** implementation of combined metrics such as NPS (Net Promoter Score), CSAT (Customer Satisfaction) and CES (Customer Effort Score), specific to each system.

Beyond simply measuring satisfaction indicators, Oney has introduced a systematic “close the loop” process to ensure that customer feedback leads to concrete actions, thereby enabling us to monitor their impact on the customer experience and on customer satisfaction.

In France, which accounts for a significant share of our European business, this 360° approach to customer feedback involves:

- › **Surveys immediately after an event:** this enables us to gather spontaneous feedback from customers about their experiences with our products, digital tools or customer relations centre, facilitating rapid and continuous operational improvements.
- › **Annual satisfaction surveys:**
- › Two, more strategic, surveys are conducted each year, one with end customers and the other with partner customers, to allow for a considered assessment of their entire experience with Oney and to guide decisions over the medium and long term.
- › **Managing social media posts and reviews:** Oney responds to both positive and negative reviews posted on social media such as Facebook and X, or on platforms of the likes of Trustpilot, App Store and Play Store.

The results of this 360° customer feedback are reflected in concrete actions aimed at meeting our customers’ expectations. For example, in France, we have introduced new features based on artificial intelligence to improve the accessibility and responsiveness of our customer relations centre. We have also created new insurance pathways to ensure greater transparency, optimised our tools to facilitate customer autonomy, and set up regular engaging meetings with our central purchasing advisors and AFM partners, etc.

Between 2023 and 2024, the percentage of customers satisfied with their experience with Oney increased from 85% to 90%. In addition, 76% of head office contacts at our partners were satisfied with their partnership with Oney in 2024, compared with 67% in 2023. **Performance that reflects Oney’s commitment to customer satisfaction.**



**90 %**  
**OF CUSTOMERS**  
**SATISFIED WITH THEIR**  
**EXPERIENCE IN 2024**

(VS 85 % IN 2023)

**76 %**  
**OF CONTACTS**  
**AT PARTNER HEAD**  
**OFFICES SATISFIED**  
**WITH THEIR**  
**EXPERIENCE IN 2024**

(VS 63 % IN 2023)





## 1.2 HANDLING COMPLAINTS

### ANALYSING AND LEARNING FROM COMPLAINTS

Oney Bank SA analyses and handles complaints relating to:

- › **Consumer protection;**
- › **Customer satisfaction;**
- › **Compliance with French regulations;**
- › **Our continuous improvement approach.**

Complaints are analysed to detect any failures, shortcomings or poor practices. We draw lessons from complaints in order to determine corrective actions.

### COMPLAINT CHANNELS

Customers can submit a complaint through various channels. They may express their dissatisfaction:

- › **Online:** using a contact form available throughout our website by clicking on the "Help" button and then "Contact us";
- › **By post;**
- › **By phoning** a dedicated number;
- › Through any **customer relations** channel handled by all our teams;
- › By going through **the appropriate mediator** where the customer is dissatisfied with the response to their complaint.

### INFORMING CUSTOMERS ABOUT OUR COMPLAINT PROCEDURES

The procedure for submitting a complaint or contacting a member of one of our teams is communicated to customers:

- › **On our websites;**
- › **On our app.**

Where a customer wholly or partially rejects or refuses a response provided to their complaint, Oney Bank SA is required to inform them about the avenues of recourse that are open to them.

They are also given contact details for the appropriate mediator.

### STEERING THE HANDLING OF COMPLAINTS

Steering the handling of complaints is based on three pillars:

- › **Operational monitoring:** monitoring of complaints received, monthly communications to customer relationship managers, quarterly overviews and an annual overview.
- › **Meetings:** monthly meetings with the departments in order to escalate complaints indicators and the associated action plans.
- › **Controls:** 1<sup>st</sup> level: processing of the complaint/proper follow-up of complaints. 2<sup>nd</sup> level: controls of customer complaints by the permanent control team under the system in place for our French operations.

This customer-centric approach is uppermost in the minds of the people at all our subsidiaries. Complaints are managed in accordance with local laws and according to the products marketed.



## 2. PROVIDING SOLUTIONS TO AS MANY PEOPLE AS POSSIBLE

### 2.1 PROTECTING VULNERABLE CUSTOMERS

Oney Group wants to **enable as many people as possible** - including people in difficulty - **to access banking services** (day-to-day banking, financing solutions, insurance, etc.). We have introduced measures to counter the risk of exclusion. We provide low-income customers with access to financing solutions, while taking care to stay within the limits of their repayment capacity. We also provide solutions to financially vulnerable customers to help them manage their account and their situation with greater peace of mind. As part of this, we comply with the regulations in force and the charter for banking inclusion and prevention of over-indebtedness published by the French association of credit institutions and investment companies (AFECEI).

#### A SPECIFIC OFFER FOR VULNERABLE CUSTOMERS

Oney Group **does not provide deposit accounts** in its capacity as a credit institution. As a result, within the scope of our activities, financially vulnerable customers are those who are at risk of over-indebtedness.

#### TAKING ACTION TO PREVENT OVER-INDEBTEDNESS

Oney Group has a **section on its website and mobile app that is specifically designed to inform and educate customers about their finances**.

This information is available in the form of articles, podcasts and videos at [https:// www.oney.fr/guide-pratique-au-quotidien](https://www.oney.fr/guide-pratique-au-quotidien).

#### FAMILIARISING FINANCIAL ADVISORS WITH THE IMPORTANCE OF BANKING INCLUSION



**IT IS CRUCIAL  
THAT FINANCIAL ADVISORS  
UNDERSTAND  
THE IMPORTANCE OF BANKING  
INCLUSION.**



Faced with the financial difficulties encountered by some customers, **it is crucial that financial advisors understand the importance of banking inclusion**: we have introduced specific training measures alongside our mandatory regulatory training programme for advisors in contact with customers who may be at risk of over-indebtedness.

**Oney Group is taking action to prevent over-indebtedness.** In accordance with the AFECEI charter, we have developed a preventive early detection system to anticipate any potential deterioration in a customer's financial circumstances. Any customer identified as being at risk of over-indebtedness will be contacted in writing or over the phone and invited to make an appointment with an advisor to review their financial situation and find a solution that is best suited to their circumstances (*adjusting banking products or services, signing up for a debt repurchasing solution, etc.*). Advisors can also refer customers to operators that provide non-banking solutions (*local associations, community welfare centres, insurance administrators in the event of a claim, etc.*).

**In 2023, we expanded our method for identifying customers at risk of over-indebtedness.**

For example, an external criterion has been included, i.e. registration of the customer by a third party on the French national register of household credit repayment incidents ('FICP').







## 2.2 ACCESSIBILITY OF OUR SOLUTIONS

### INCLUDING EVERYONE THROUGH DIGITAL ACCESSIBILITY



#### DIGITAL ACCESSIBILITY IS ESSENTIAL TO ACHIEVE THE GOAL OF UNIVERSAL DIGITAL SERVICES



Digital accessibility is essential to achieve the goal of universal digital services, since the aim is to **make information and the features of a digital service or content accessible to all**, regardless of a person's disability or the way in which they access information. This relates to digital services for the general public, employees and customers (*individuals and professionals*).

BPCE Group has communicated on its commitments in this area via its 2025-2027 accessibility plan. As part of this, *Oney Group* has taken the following actions:

- › Audit of sites serving individual and professional customers;
- › Implementation of the action plan;
- › Publication of the action plan and accessibility plan online at *oney.fr*;
- › Start of remediation.

As part of this approach, a twofold objective has been set for 2025 at *BPCE Group level*:

- › Addressing digital service accessibility issues to ensure at least partial accessibility;
- › For new digital services, enabling project methodologies to evolve in order to factor in digital accessibility from the design stage.

*Oney Group* has also embarked on work to improve the accessibility of automatic teller machines (ATMs), cards, document publishing and payments.

**We have launched a bank card for the visually impaired that features braille and an identifiable notch.**

We have already installed the following features at our ATMs:

- › Headphone jacks for confidential audio-guided withdrawals;
- › The selection displayed on the screen may also be contained on the keypad;
- › A clearance under ATM machines to facilitate their use by wheelchair users;
- › Keypads with braille.

### BEING MORE IN TUNE WITH THE NEEDS OF VULNERABLE CUSTOMERS

*Oney Group* has further enhanced the systems put in place to serve customers in difficulty and respond to their needs by establishing a dedicated team within the customer department. This unit welcomes, supports and follows up customers who may be at risk of over-indebtedness or of falling into financial difficulty.

### DEVELOPING FINANCIAL EDUCATION

All year round, **Oney actively seeks to advance financial education and prevent over-indebtedness** through social media posts providing budgeting advice and tips. *Oney* has also prepared a budgeting guide for the general public, available at *oney.fr* and via the mobile app. *Oney* has been taking concrete action since 2013 in partnership with Crésus, a network of associations that support people in vulnerable financial situations. **The aim is to prevent customers from falling into financial difficulty and to give them a helping hand.**

Such financial education initiatives enable these vulnerable sections of the public to better control their day-to-day budget. They also help them to better manage their finances at crucial moments in their lives and to make their plans a reality. These resources also provide an answer to the challenges that have emerged with the recent shift in people's relationship with money, particularly those related to new lifestyles and consumption (*online purchases, inflation, savings, social and environmental awareness, etc.*).



### 3. PROTECTING OUR CUSTOMERS' INTERESTS

#### 3.1 A TRANSPARENT OFFER

Oney Group echoes the transparency policy defined at BPCE Group level.

Products and services intended for consumers must comply with the provisions of the French Consumer Code relating to prohibited commercial practices (*with the exception of refusal to sell*). This encompasses misleading or aggressive commercial practices.

With this in mind, the people who draw up commercial documents are invited to take particular care in ensuring there is compatibility between the terms of sale, the method/process for making information available, and the target customer base. Similarly, people who prepare promotional documentation must be very attentive to the proposed marketing channels and the suitability of the distribution strategy.

**All the information provided to consumers, including advertising material, must be accurate and clear, and in no way misleading.**

For information to be clear, it must enable the customer to understand the main characteristics

of the product they are about to purchase, as well as the associated benefits and risks.

**PROTECTING CUSTOMERS' INTERESTS IS A CORE CONCERN AT ONEY GROUP.**

Protecting customers' interests is a core concern at Oney Group. **Employees must, at all times, serve customers in good faith and in a diligent, honest and professional manner, and offer them products and services they can understand and that are tailored to their needs.** As part of this, and in order to maintain a high level of customer protection, we have established a set of procedures and conduct specific controls in this area.

#### 3.2 PROTECTING PERSONAL DATA AND USING CUSTOMER DATA WITH RESPECT

##### PROTECTING PERSONAL DATA

Oney Group has appointed a Data Protection Officer (DPO) and has duly notified the French data protection agency (CNIL). The main duties of the DPO involve steering, supporting and coordinating the implementation of the European General Data Protection Regulation (GDPR) at Oney Group. They must ensure, in particular, **that customers' personal data is used in accordance with the applicable regulations.**

They verify that regulatory and guideline changes dictated by the CNIL are duly taken into account.

The commitments made by the Oney Group to protect personal data are summarised in the framework policy for data protection and are consistent with BPCE Group principles.



**PROVIDING CUSTOMERS WITH GREATER TRANSPARENCY REGARDING THE PROCESSING OF THEIR PERSONAL DATA.**



The Oney Group framework policy for data protection sets out ethics-based principles for using personal data in accordance with the regulations in force. It applies to all operations that process personal data. **It is updated with a view to providing customers with greater transparency regarding the processing of their personal data.**

In accordance with personal data protection laws, the contracts entered into with service providers that process personal data strictly stipulate that they must use this data for the sole purpose of performing their services.

Any sharing of data within or outside the Oney Group shall be in line with the "data minimisation" principle and carried out in compliance with the obligations imposed on Oney Group. For example, Oney Group may disclose certain personal data to BPCE SA in its capacity as the central body of BPCE Group to which Oney belongs, so that it can fulfil the various tasks assigned to it by law, for the benefit of Oney Bank SA and the Group, namely for the purposes of reporting to any competent regulatory authority.

In some cases, Oney Group shall only process customers' personal data where they have given their consent. Customers shall be informed of this and contacted before their data is processed so that they can indicate whether they specifically consent to their data being processed for the stated purpose;

For example, we are required to seek customers' consent to:

- › Send commercial offers by email relating to products and services that bear no relation to those already purchased from Oney or relating to third-party products and services;
- › Install trackers on users' terminals and/or access personal data stored on these terminals;
- › Store customers' bank card data in their online customer accounts;
- › Share data with members of the Valiuz Alliance.

We organise regular training sessions to raise employee awareness about best practices and legal obligations when it comes to data protection.

**In 2024, 99% of our employees in France and 97% of the workforce in Oney Group entities completed a GDPR e-learning module.**

Lastly, the Oney Group Data Protection Officer spearheads and steers a community of local DPOs at our subsidiaries, disseminating BPCE Group rules and ensuring the consistent application of the internal measures that have been defined.

##### CYBERSECURITY

Information Systems (IS) contain and process a multitude of sensitive data relating to business with our customers, the Oney Group strategy, our financial earnings, our business development or commitments, as well as personal information relating to customers, partners and staff. They must therefore be protected from any known or emerging threats, taking into account the vulnerabilities inherent in the technologies used to run them.

**Various security measures have been taken to protect end users and to secure data and transactions** as part of the Group Information Systems Security Policy ('PSSI-G'):

- › Multi-factor authentication to secure access to online accounts;
- › Encryption of sensitive data in transit and at rest, such as personal and banking information;
- › Monitoring of IT events alongside a detection and alert system to prevent intrusions or cyber attacks;
- › The security of our applications is based on security standards that are reassessed annually to protect users against cyber threats;
- › Regular communication on cyber threat awareness for users;
- › Regular updates to correct system and application vulnerabilities;
- › Access controls to minimise the risk of unauthorised access;
- › Assistance and support, including various communication channels and hotline services, to help users should a security problem arise, such as identity theft or fraud.
- › In 2024, 99.7% of Oney employees in France completed e-learning training on the basics of cybersecurity.





# VI. Ethics and responsibility

1.

CORPORATE CULTURE  
AND POLICIES ON BUSINESS CONDUCT

2.

MANAGING OUR ACTIVITIES IN THE INTERESTS  
OF OUR CUSTOMERS AND SOCIETY

3.

SETTING AN EXAMPLE BY IMPLEMENTING  
A RESPONSIBLE PURCHASING POLICY



# 1. CORPORATE CULTURE AND POLICIES ON BUSINESS CONDUCT

## 1.1 PROMOTING AN ETHICAL CULTURE

Oney Group’s Code of Ethics is a clear and practical document intended as a guide for all employees in their relations with the group.

It is available on the Oney intranet site and emphasises rules of conduct and best practices.

The code is appended to the Oney internal rules of procedure. It brings together the behaviour-related, moral and ethical principles applying to everyone at Oney Group. The code establishes certain guiding principles and rules so as to provide a common vision of ethical standards at Oney Group level.

The document describes and draws upon the regulatory provisions relating to ethics that must be complied with by each entity and employee in the performance of their activities.

It is necessary to issue a reminder of these general rules of good conduct and specific duties insofar as any breach may lead to disciplinary measures or even criminal prosecution of an entity or its employees.

**Our rules of ethics apply to all employees, regardless of their status, within the framework of their duties.** Every employee pledges to follow them.

In the context of our development and our relations with our partners, we have also drawn up **an exclusion list of products and services that we do not wish to see financed** (*criminal activities or activities that are illegal in the countries in which we operate (including counterfeiting and regulated services); activities that go against moral standards, constitute public order offences, outrage public decency, are contrary to*

*the general interest beyond the invasion of privacy, or have clear consequences in relation to public health or serious (psychological) dependence; activities that are damaging for animal welfare or involve cruelty towards animals, activities relating to any form of proselytizing/communitarianism/sectarianism/radicalism, be it defamatory/insulting/discriminating or racial, or political/religious and relating to the integrity and dignity of human beings or other social issues*).

An exceptional procedure may allow for case-by-case analysis subject to approval by Oney’s governance bodies.



**ONEY GROUP IS COMMITTED TO FORGING LASTING RELATIONSHIPS BUILT ON TRUST AND TO CONDUCTING ITS BUSINESS WITH INTEGRITY.**



With this code of ethics, Oney Group is committed to forging lasting relationships built on trust and to conducting its business with integrity.

We have developed an e-learning programme to promote the principles set out in the code throughout Oney Group. This training is mandatory for all employees as well as for all new hires. At 31 December 2024, 99.3% of Oney Bank SA staff had completed the training.



**99.3 %**  
**OF ONEY BANK SA**  
**STAFF HAD COMPLETED**  
**A COURSE TESTING THEIR**  
**KNOWLEDGE OF THE**  
**GROUP’S CODE OF ETHICS**

AT 31 DECEMBER 2024



## 1.2 PROTECTING WHISTLEBLOWERS

Oney Group has implemented the BPCE “Whistleblowing” policy. This policy applies to all Oney Group entities and stipulates:

- › **The persons who qualify to issue an alert:** any internal, external or occasional Oney employee, manager, subcontractor, senior executive or any other person, providing they are acting with no financial consideration and in good faith;
- › **The type of alert that can be made:** the procedure for reporting and processing the alert, the confidential nature of the information, the protective status of whistleblowers and the penalties incurred in the event of a failure to comply;
- › **The categories of persons who will receive protection:** the whistleblower, facilitators, persons connected with the whistleblower and legal entities controlled by the whistleblower in which the whistleblower works or with which they have connections in a professional framework.



Whistleblowing reports must relate to conduct or situations that may constitute a breach of the rules applying to Oney Group. They may also relate to a crime, offence, threat or harm to the public interest, a breach or an attempt to conceal a breach of international law, European Union law, national law or Oney rules.

Any channel defined by the entity may be used to make a report, provided that the whistleblower’s identity and privacy are fully guaranteed.

The Whispli group platform is the main whistleblowing channel for all the institutions participating in the system. All employees and service providers in France have direct access to this platform via a URL<sup>6</sup>. An international version is earmarked for 2026.

Whistleblowers may make a report directly to their manager, send it by post to the Oney Compliance Director/Officer, taking care to mark it “Strictly Confidential”, or use the dedicated generic email address (*alerte-conformite@oney.fr*), which can only be consulted by authorised persons. All Oney Group stakeholders can make a report using this last option, including customers, partners and business introducers.

A mandatory regulatory “whistleblower” e-learning programme was introduced to coincide with the roll-out of the Whispli platform. This programme specifies, in particular, the rights and obligations of whistleblowers and the protection afforded to them.

An explanation of the procedure is provided to all employees on the Oney (Neo) intranet site, which is permanently accessible to the persons concerned.

At 31 December 2024, 99.7% of Oney Bank SA staff had completed this programme.

**99.7 %**  
**OF ONEY BANK SA**  
**STAFF HAD COMPLETED**  
**WHISTLEBLOWER TRAINING**

AT 31 DECEMBER 2024

<sup>6</sup> <https://BPCE.whispli.com/speakup%20?locale=fr>



## 2. MANAGING OUR ACTIVITIES IN THE INTERESTS OF OUR CUSTOMERS AND SOCIETY

### 2.1 PREVENTING AND DETECTING CORRUPTION AND BRIBERY

**The rules and procedures we have in place help to prevent and detect behaviour likely to characterise acts of corruption or influence peddling:**

- › The different group entities have drawn up a map of their corruption risks and keep this map regularly updated, using a methodology that complies with the recommendations of the French anti-corruption agency (AFA). The results of this risk mapping, including any action plans, are submitted to Oney Group's management for approval;
- › Action plans are formalised in order to reduce the risk level of certain scenarios, where these levels remain too high after factoring in mitigation measures;
- › The group policy on "gifts, benefits and invitations" sets a maximum threshold for gifts received or given. Anything above this threshold must receive prior authorisation from line managers and be reported to the Compliance department. Specific due diligence rules were adopted as part of our sponsorship of the Paris 2024 Olympic and Paralympic Games in order to ensure that hospitality for customers and other third parties was allocated in accordance with the required procedures;
- › All employees, including those in exposed positions, particularly senior executives, are required to complete training on professional ethics and anti-corruption rules.

- › At 31 December 2024, 100% of people in exposed positions were covered by these training programmes;
- › Suppliers representing total Group-level purchases worth at least €50,000 are assessed based on a certain number of criteria (purchase category, geography, negative information about the supplier). If necessary, this assessment may lead to additional due diligence to measure the ultimate risk, based in particular on the anti-corruption measures taken by the supplier;
- › Relationships with intermediaries (including business introducers) and customers are governed by a framework: all contracts and agreements contain anti-corruption clauses; "approval committees" are provided for; and the integrity of new partners is also assessed by these committees;
- › BPCE Group's anti-corruption rules can be found on the Oney (Néo) intranet site. Disciplinary measures, up to and including dismissal, are provided for in the event of a breach of these rules.

At 31 December 2024, 99% of Oney Bank SA employees had completed this training, as well as 98% of staff at international entities.

**99 %**  
**OF ONEY BANK SA STAFF HAD COMPLETED CORRUPTION DETECTION TRAINING**

AT 31 DECEMBER 2024



### 2.2 COMBATING INTERNAL FRAUD

**Oney Group has put in place a system shared with BPCE Group to combat internal fraud, non-compliance with the internal rules of procedure and breaches of rules of professional ethics, in keeping with the Code of Conduct and Ethics.**

This system meets the requirements of the supervisory authorities and pools the resources and work carried out by our institutions.

It is formalised in the "Combating internal fraud" framework procedure, which each institution must implement and which consists of the following elements:

- › Mapping of internal fraud risks;
- › Detection queries and alert escalation in order to protect the interests of our customers in particular;
- › Awareness-raising actions tailored to the specific characteristics of each entity;
- › A training programme specific to staff involved in internal fraud prevention;
- › A psychological support system for persons suspected of fraud and close associates;
- › A declaration and reporting system.

**ONEY GROUP FOLLOWS THE INSTRUCTIONS SET OUT IN THE FRAMEWORK PROCEDURE TO ORGANISE THE INTERNAL FRAUD PREVENTION SYSTEM.**

Oney Group follows the instructions set out in the framework procedure to organise the internal fraud prevention system. The handling of issues relating to internal fraud and breaches required the establishment of an Internal Fraud Prevention Unit ("LAFI"), with dedicated staff who are tasked with:

- › Processing acts of fraud and internal breaches operationally;
- › Preventing through employee awareness campaigns;
- › Organising the detection of fraud and internal breaches;
- › Handling investigations into suspected fraud or breaches;
- › Updating the detailed risk mapping;
- › Assessing the system.

**The staff at the "LAFI" unit must complete training every five years.**

Any institution with an employee who has been assigned to or is involved in the operational processing of fraud, particularly in the investigation and processing/correction phases, is required to register the employee for this training within six months.

The "LAFI" unit engages in **awareness-raising actions geared towards new hires whenever necessary**. For example, an internal fraud awareness module has been added to the compliance module and will be rolled out in 2025 for all employees in France and our international markets.





### 2.3 ANTI-MONEY LAUNDERING AND COUNTERING TERRORIST FINANCING

The measures taken to combat money laundering and terrorist financing (AML-CTF) have a dual objective: **preventing criminal activities by depriving criminals of funds, and taking steps to ensure the solidity, integrity and stability of the economic and financial system.**

**98 %**  
**OF ONEY GROUP STAFF**  
**HAD COMPLETED ANTI-MONEY**  
**LAUNDERING TRAINING**

AT 31 DECEMBER 2024

Our AML-CTF system has five main components:

- › **Assessment of AML-CTF risks:** Oney Group analyses its risk exposure based on factors provided for by law inherent to its customers, products and services, transactions and distribution channels and according to geographical factors. This analysis is formalised in our risk classification, which takes the issue of “high-risk” countries into consideration for example. An AML-CTF risk profile is established for each customer so that a due diligence score can be assigned to them;
- › **Know Your Customer:** Know Your Customer (KYC) means having information on the business, financial capability and net worth of a customer, and being aware of any reputational information reported by reliable media sources, etc. so that institutions can understand the general economics of the financial transactions carried out by the customer (*knowledge about the origin and destination of funds, and justifications for movements*). KYC includes, in particular, detecting Politically Exposed Persons (PEPs) and identifying the beneficial owners of legal entities;
- › **Constant vigilance over transactions** throughout the business relationship and according to the AML-CTF risk level, making it possible to identify unusual transactions that are contrary to expected customer behaviour. Our institutions urge their employees to be vigilant and they have largely automated means of detecting unusual transactions;
- › **Human analysis of alerts** and, where appropriate, enhanced reviews where there are doubts regarding atypical/unusual transactions;
- › **“Suspicious transaction reports”** to TRACFIN (French financial intelligence agency), where there is a lingering doubt as to the legality of sums or transactions.

**The effective implementation of our financial security system is based on our corporate culture at all hierarchical levels and an appropriate organisation within each institution** (team dedicated to financial security).

Oney Group holds regular training for employees and senior management as part of a harmonised training system, at least twice a year, alongside specific training for financial security staff. At 31 December 2024, 98% of employees had completed anti-money laundering training in France and at our international entities.

### 2.4 COMPLYING WITH NATIONAL AND INTERNATIONAL SANCTIONS (EMBARGOES, ASSET FREEZING)

Oney Group and all BPCE Group companies **take care to strictly follow the regulations in force** and do not accept any activity whose purpose or effect is to circumvent prohibitions.

BPCE Group complies with all forms of applicable financial sanctions, which may target a country or territory, an organisation, an individual, a legal person, a ship, an aircraft, certain goods or services, or certain activities. These sanctions may involve the freezing of assets and economic resources, total embargoes, and specific restrictions or embargoes on particular types of transactions<sup>7</sup> or on the export or import of certain goods, services or technologies<sup>8</sup>.

Oney Group has joined the “Sanctions” system alongside BPCE Group. These requirements apply to senior managers and all employees, particularly Compliance staff.

Oney receives communications from BPCE, participates in regular audio conferences and, in turn, raises awareness about sanctions and embargoes among the entities and employees concerned.

<sup>7</sup> For example, long-term financing or where such transactions are carried out by natural or legal persons hit by sanctions.

<sup>8</sup> For example, military assets or to or from sanctioned countries or territories.



### 3. SETTING AN EXAMPLE BY IMPLEMENTING A RESPONSIBLE PURCHASING POLICY

**Oney Bank SA contributes to collaboration and vibrancy in its markets by relying on local suppliers** (France). These suppliers (microenterprises/SMEs) make up 74% of our supply chain<sup>9</sup>. In 2024, we made 88% of our purchases with local suppliers and 83.5% of the total amount of invoices was paid within standard payment deadlines.

#### A LASTING AND BALANCED RELATIONSHIP WITH SUPPLIERS

**Oney Group is committed to promoting a lasting and balanced relationship with suppliers.**

This is one of the commitments made as part of BPCE Group's Responsible Purchasing Policy.

In line with our charter and backed by the ISO 20400 Sustainable Procurement standard, the Supplier Relations and Responsible Purchasing ("RFAR") label is awarded by the "Médiation des Entreprises" business mediator (under the authority of the French Ministry of the Economy and Finance) and the CNA (National Procurement Council). This label is awarded to French companies that have forged lasting and balanced relationships with their suppliers. Thirteen BPCE Group companies have long been committed to the continuous improvement approach towards Responsible Purchasing promoted by the label. BPCE Achats & Services, which was awarded the label in 2024, is looking to gradually extend this approach to all group companies through a BPCE Group 'RFAR' certification policy.

For example, it has staged three awareness-raising sessions regarding supplier assessments using the CSR questionnaire.

In 2024, BPCE Achats & Services introduced supplier surveys **to assess their level of satisfaction**.

In addition, Oney Bank SA has long been a member of SRS (Société de Recherche de Synergies), which provides a channel based on certain business synergies with other member companies (mainly members of AFM) to share best practice or improve the shared terms they can secure with common suppliers.

<sup>9</sup> This rate is calculated by comparing the amount of expenses incurred by Oney Bank SA with microenterprises/SMEs with the amount of total supplier expenses over one year.



**74 %**  
**OF OUR PURCHASES**  
**WERE MADE WITH**  
**MICRO-ENTERPRISES/**  
**SMEs**

IN 2024

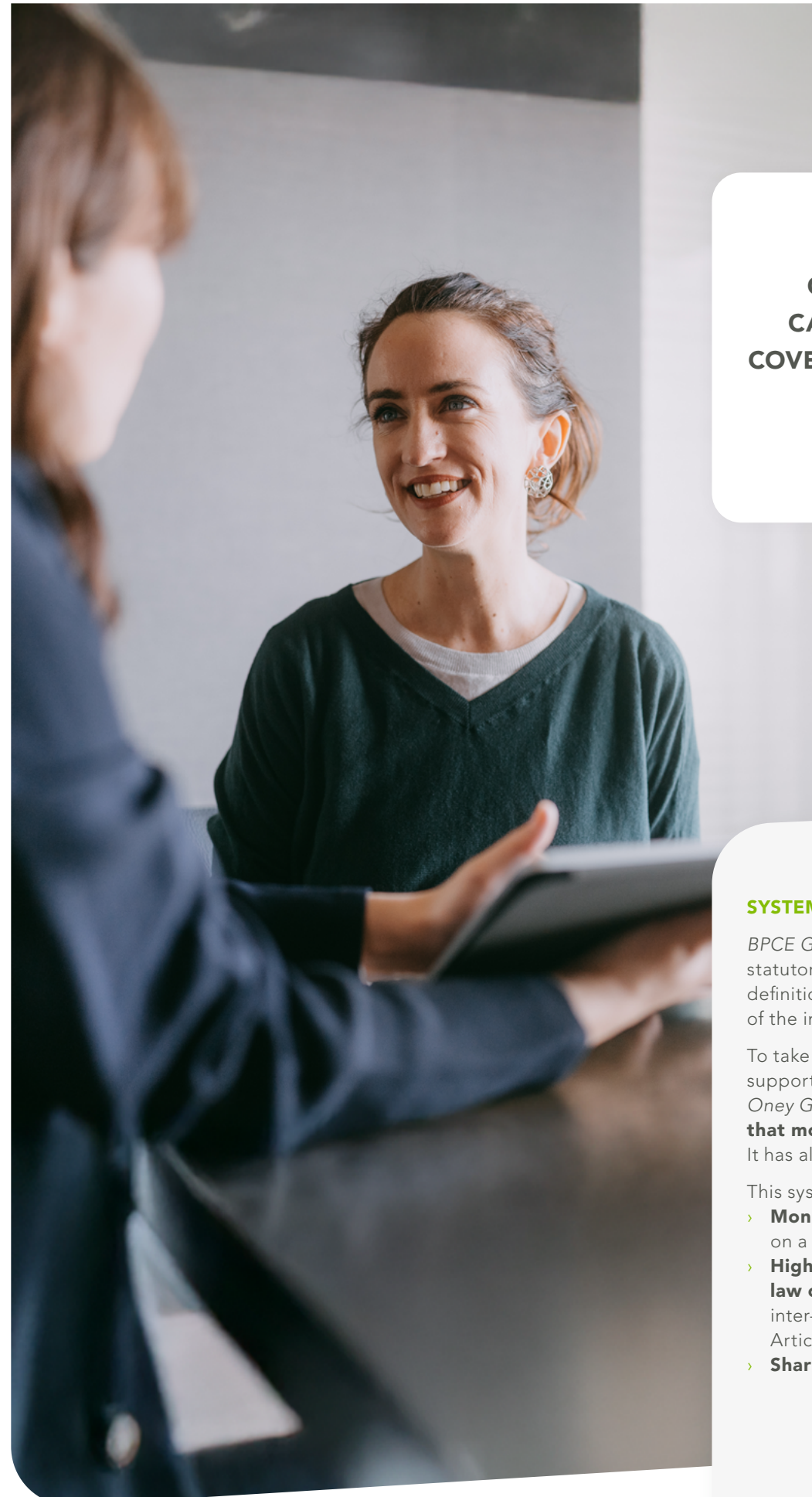


## SOCIAL AND ENVIRONMENTAL CRITERIA FOR SELECTING SUPPLIERS

Oney Group applies the *BPCE Responsible Purchasing policy (politique-achats-responsables-du-Groupe-BPCE-2)*, which is in line with the group's CSR ambitions and commitments and in which the purchasing department plays an essential role in driving transformation and development. Our Responsible Purchasing approach is part of a global and sustainable performance objective involving the group's companies and their suppliers.

CSR is an integral part of:

- › **The purchasing process**, which specifies the procedures for implementing responsible purchasing;
- › **Our purchases, through the incorporation of appropriate CSR criteria in decision-making processes**, by indicating the CSR performance of planned products and services in the specifications, and by increasing the weight of suppliers' CSR assessment scores in the decision-making process. Since 2022, 100% of our purchasing categories have been covered by CSR assessment questionnaires. We are currently rolling out a method in our purchasing function for taking the cost of ownership into consideration, which will enable us to gauge acquisition, use and end-of-life costs;
- › **Specific contractual clauses**, aimed at ensuring that subcontractors comply with regulations on fundamental freedoms and rights, health and safety of people, and social, labour or environmental issues. Suppliers must be able to provide evidence of their compliance on request;
- › **Our tool for identifying the CSR issues and risks** intrinsic in each purchasing category, ahead of planned purchases and for each of the 142 purchasing categories;
- › **The acquisition of professional qualifications by our purchasing staff**, in particular with a training programme that is regularly added to (*Responsible Purchasing, training deployed with AFNOR on the ISO 20400 standard*), plenary sessions bringing together all purchasing and CSR staff to share information and best practices. In 2024, Purchasing/Business Line staff at the different group companies paired up to complete awareness training on inclusive purchasing with a view to increasing sourcing from the sheltered employment sector;
- › **The development of sourcing from suppliers in the sheltered employment sector** (*listing of inclusive service providers, particularly for technical assistance services, and implementation of a specific training module, etc.*).



**100 %**  
**OF OUR PURCHASING  
CATEGORIES HAVE BEEN  
COVERED BY CSR ASSESSMENT  
QUESTIONNAIRES**

SINCE 2022

## SYSTEM FOR MONITORING PAYMENT TERMS

*BPCE Group* is committed to honouring payments within statutory payment deadlines, in accordance with the legal definition which provides for settlement within 60 days of the invoice date.

To take this even further, *BPCE Achats & Services*, which pools support activities on behalf of the group's entities, including *Oney Group*, has had a **system in place for many years that monitors payment terms at all group companies**. It has also published a "*White Paper on payment terms*".

This system is designed to:

- › **Monitor** the payment terms of group companies on a **quarterly** basis;
- › **Highlight the regulatory context surrounding the French law on the modernisation of the economy**, which regulates inter-company payment terms and caps payment terms under Articles L441-10 et seq. of the French Commercial Code;
- › **Share best practices** when it comes to payment terms.



Oney Bank,  
A French 'société anonyme' (limited company) with share capital  
of €71,801,205, with its registered office at 34 avenue de Flandre,  
CROIX (59170), registered in the Lille Métropole Trade and Companies  
Register under number 546 380 197.

To find out more, visit [oney.com](https://oney.com)!



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