



CODE OF CONDUCT AND ETHICAL STANDARDS

Oney Group

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YOUR MONEY YOUR WAY



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Introduction



Jean-Pierre CHARLES
Chief Executive Officer of the Oney Group

« Oney has always had a solid foundation of ethical values.

More than a legacy, they are an expression of who we are, shaped by our unique DNA, where the retail and banking sectors collide. This dual culture has taught us to combine high standards, a sense of service and a spirit of innovation. It makes us a unique player, capable of imagining solutions that are truly useful, to serve our partners, their customers and society.

We have been an active and responsible player in the economy since 1983.

By **facilitating payment, providing appropriate financing and insurance solutions,** and **combating fraud every day** to protect our customers and partners, we empower people to move forward with confidence.

We place inclusion at the heart of our mission: to find the right solution in every situation, so that everyone can carry out their projects.

We support both physical and digital commerce, supporting their development and promoting more sustainable ways of consuming.

With the support of our shareholders, BPCE and ELO, we believe that our collective commitment can contribute to a more responsible, sustainable and human future. All this is echoed in our Code of Conduct and Ethical Standards.

The Code sets out the principles that should guide our behaviour towards:

- › our customers, to ensure they are all treated fairly, in a transparent and safe manner;
- › our employees, to promote their professional growth and fulfilment, while respecting each individual's work-life balance;
- › the society, to encourage responsible practices and place people at the heart of everything we do.

This code also sets out our essential legal obligations: combating money laundering, combating corruption, data protection, privacy and vigilance against the risk of fraud. It illustrates these principles through practical scenarios we may encounter in our daily work, **to help us make the right decisions.** If in doubt, never stay silent: it is important to speak up, ask questions and seek advice. No ethical issue is ever trivial.

Oney's reputation, the trust of our customers and partners, as well as the long-term success of our company, all rely on our ability to uphold these principles every day, both in France and internationally.

We all have a role to play.

I am personally committed to this and I am counting on each and every one of our employees to embody these ethical principles that build our actions, our integrity, and our responsibility.



Our beliefs and commitments

At the Oney Group, we firmly believe that a bank must, **above all, serve its customers.** This means acting every day with **honesty, fairness, loyalty and professionalism** to best protect their interests. Our close ties with them allow us to build **personalised relationships**, based on openness, trust and transparency, according to each person's needs and circumstances.

We are fully aware of our role in society, which is why we develop **sustainable partnerships** and encourage our stakeholders to adopt **more responsible consumption methods**, respecting planetary boundaries and making people a core focus in our decisions. We also strive to provide our employees with an environment that fosters **well-being, respect** and **cooperation.**

Our ambition is clear: to create a mutually beneficial dynamic with all our stakeholders. We consider the direct impact of our activities, but also their indirect effects, especially those linked to our customers usage and consumption.

With that in mind, we are committed to reducing our own footprint and co-building a more sustainable future alongside our partners, through solutions that combine responsibility and shared value creation.

True to our values, we have also drawn up a list of products, services and activities that we refuse to finance. Some sectors are simply not consistent with our beliefs, and it is essential to make this clear in our decision-making processes.

Our beliefs and commitments are in line with those of our shareholders, the BPCE and ELO Groups, to respect and promote Human rights. This is one of the foundations of our corporate social responsibility. These principles are set out in this Code of Conduct and Ethical Standards, which is structured around three pillars:

- › Interests of **customers**;
- › Our responsibility as an **employer**;
- › Our **social** responsibility.

These rules of conduct apply **to all employees** of the Group, regardless of their status, as well as to **all our stakeholders**: business partners, suppliers, service providers, subcontractors and beyond.

Everyone undertakes to comply with the Oney Group Code of Conduct and Ethical Standards.

Finally, these principles apply to all our entities and in all the countries in which Oney is present or operates. They form a shared foundation that guides our day-to-day actions and enables us to move forward together in a consistent and responsible way.



Our beliefs and commitments



Interests of customers



Employer and employee responsibility



Social responsibility



Interests of customers

Interests of customers

Principle 1 - Foster a spirit of openness and trusting relationship.

Listening to customers and developing a lasting spirit of service.

The Oney Group's principles for action towards all its customers are close relationships, accessibility and spirit of service. These principles are applied in accordance with business line procedures.

Our employees are tasked with meeting the needs of the customers by creating a climate of trust through attentive listening and outstanding service; they are central to the customer relationship.

Regardless of the channel chosen by customers to interact with us, they must enjoy the same degree of efficiency in the handling of their requests and be able to express – when they so desire – their satisfaction or dissatisfaction with the speed and relevance of the answers given.

We are committed to a customer-centric approach by placing their needs and expectations at the heart of everything we do, both in France and internationally.

To this end, we have developed a 360° listening approach that addresses our customers at each key stage through post-event surveys and strategic studies. This enables us to assess and monitor the quality of their experience with Oney through our products and services. We use the feedback from our customers to take concrete actions to sustainably improve their experience.

We respect our customers by avoiding over-solicitation in our feedback procedures. Every survey invitation is optional, and our customers may choose to take part or opt out at any time. We are also careful to obtain their prior consent before sharing any feedback externally, ensuring a transparent and respectful approach.

TO SUM UP, WE MUST ALL:

- › Listen carefully and strive to understand our customers' needs.
- › Always bear in mind the customers' long-term interests.
- › Be responsive in handling customer requests.

IN PRACTICE

 **A customer subscribes to a 3x4x solution on a partner site. Then he receives an email asking him to complete a satisfaction survey.**

What is this for?

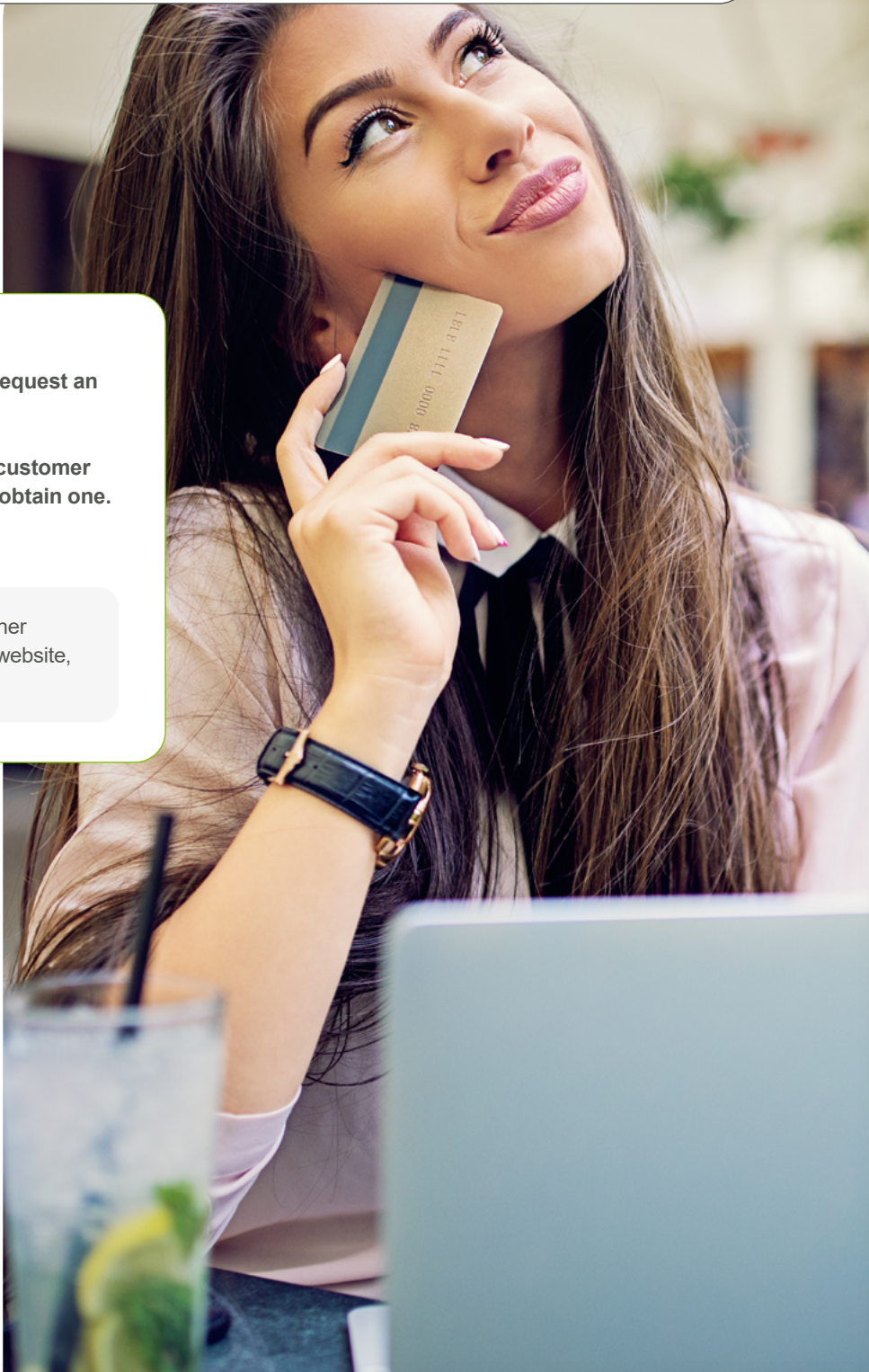
This survey is a way for customers to tell us what they thought about their experience. They can also make recommendations, which the Oney teams will review and act upon if needed.

IN PRACTICE

 **A customer calls an advisor to request an account statement. The advisor refuses to send out a statement and invites the customer to log onto the Oney website to obtain one.**

What can the customer do?

The customer may file a complaint, either online using the form available on the website, or by telephone or post.



Meeting the needs of customers by offering tailor-made solutions.

The companies within the Oney Group are committed to building long-term relationships based on trust with each of their clients.

This relationship is founded on their longstanding practice of taking a global, customised approach to customers' present and future needs.

It calls for a commitment throughout the relationship with customers: to anticipate and support their projects, take account of changes in their personal situations and be at their side in both the good and the bad times.

The Oney Group entities undertake to offer a response tailored to the needs of their customers and to the new uses they expect them to cater for.

TO SUM UP, WE MUST ALL:

- › Deliver customized information, advice and expertise throughout the entire customer relationship.
- › Provide solutions tailored to customers' needs and new forms of bank/customer interaction.
- › Assist customers through the key stages in their personal or professional pathways under the best possible conditions.

IN PRACTICE

 You receive a call from a customer's son informing you that his mother has died.
How do you react?

First of all, you express your condolences at this difficult time. You then tell him about the first steps to be taken.
Depending on his mother's situation, you refer him to the relevant departments indicated in the procedures. The dedicated experts will be able to guide him through the entire administrative process.

Principle 2 - Guarantee impartial treatment for all our customers.

The Oney Group entities, either directly or through their partners, welcome all types of customers and offer them personalised solutions tailored to their specific needs. Our pricing terms can be consulted at any time on the Oney website or on our partners' websites.

All customers can file a complaint by email, telephone or post, using a simple procedure, as described on the website. An independent mediator is also available, free of charge, in the event of a persistent disagreement with Oney. He has a dedicated website, where mediation requests can be filed directly.

Reasons for complaints are systematically analysed in an effort to continually improve our services in order to identify best practices and prevent malfunctions. Everyone must contribute to this continuous improvement process by familiarising themselves with customer irritants and providing solutions to handle them.

We have a dedicated listening and support service for vulnerable customers due to disability or financial difficulty, allowing us to tailor our response to their specific needs and ensure that we remain attentive to their individual needs and provide personalised solutions.

The Group considers this to be one of its corporate social responsibilities.

For example, Oney France provides a free service called ACCEO for existing and prospective customers with a hearing impairment, where people who are deaf or hard of hearing can talk to an Oney advisor over the phone.

The Oney Group has also launched accessibility initiatives for ATMs (audio-guided confidential withdrawals using a headphone jack, keypad navigation for on-screen options, wheelchair-adapted knee clearance beneath ATMs, Braille keypads), cards (bank cards with Braille and an orientation notch for the visually impaired), documents and payments.

IN PRACTICE

 A customer is not happy with the way his bank card is working.
What can he do?

He can call a dedicated, toll-free number or send an email or a letter to a dedicated address. He can also file a complaint via the www.oney.fr website. The customer relations department will acknowledge receipt of this complaint and process it. If the customer is unhappy with the response or proposal made to him, he can refer the issue to the mediator, free of charge.

Principle 3 - Protect the interests of our customers.

Protecting the interests of our customers is of fundamental importance to the Oney Group. It is an essential prerequisite for building a lasting relationship of trust.

The Oney Group undertakes not to disclose its customers' personal data and is committed to ensuring their protection.

The Group's entities comply with current legal provisions, notably regarding the use of information systems and means of communication, which is governed by a charter on the use of information and communication technologies, adopted by the Oney Group. This charter commits the Group's entities and its employees to respecting the provisions of the European General Data Protection Regulation, particularly the principles relating to loyalty, vigilance, ethics and traceability.

TO SUM UP, WE MUST ALL:

- › Place customers' interests above all other considerations, at all times.
- › Fulfil the duty to provide advice and respect the primacy of customers' interests.
- › Explain, in an open dialogue, why the proposed solutions match the customer's needs and check that the services desired by the customers are appropriate to their particular situation and risk profile.
- › Make sure that customers understand the nature and details of the solution recommended to them.
- › Know how to identify and manage – using procedures provided by each Group entity – any conflict of interest liable to arise from the respective situations of the customer, employee, bank or stakeholders. This includes being open with customers about any ownership links between the entity and any of the distributors and producers enlisted in the Oney Group.
- › Comply with banking secrecy rules and keep the dealings with customers confidential.

IN PRACTICE



You are a customer advisor. A customer informs you that he is involved in litigation with his former wife about the division of their joint property. He would like to know the value of the assets held by his ex-wife, who is also a customer.

Are you entitled to share this information?

No, you are bound by banking secrecy rules. If the customer and his ex-wife are not co-signatories and therefore have two separate contracts, you must refuse to answer him, adding that you will not provide any information, even with the agreement of his former spouse.

Principle 4 - Communicate in complete transparency.

Our customers must be certain that the services and products we recommend are the solutions best suited to their needs and long-term interests.

To achieve this, all Group entities undertake to communicate with their customers in a transparent and honest manner.

TO SUM UP, WE MUST ALL:

- › Give customers the explanations they need to understand the recommended solutions.
- › Provide customers with transparent and honest information (costs, performance, risks, etc.).
- › Respond clearly and promptly to customers' requests.

IN PRACTICE



One of your customers wants to sign up for an insurance product, but is wondering whether it is the right solution for him.

What should you do?

It is your duty to spend the necessary time with your customer to explain the features of the solution and check that the eligibility criteria are met. To do this, you must strictly follow the subscription process designed to protect customer interests.



Employer and employee responsibility

Employer and employee responsibility

Principle 5 - Promote exemplary, principled and considerate behaviour.

Our ambition is to promote, in all circumstances, ethics in our employees' decisions and behaviours, by setting guidelines that every employee is familiar with.

We have obligations towards our customers and administrators, and we must respect the same obligations in the way we behave towards each other.

The company's image is reflected in every employee, and we must bear this in mind in our conduct. Inappropriate attitudes towards co-workers can cause significant harm to the company's image, both within and outside the company.

The day-to-day interaction between managers and their teams further heightens the need for excellence in their actions and decisions. Managers must help advance the development of their staff in a climate of trust.

Every manager shares responsibility for the work/life balance of the people under their responsibility.

The Oney Group is particularly attentive to this, as demonstrated by the Group Human Resources policy and the signing of the Oney Bank SA agreement on gender equality in the workplace, quality of life at work and working conditions.

TO SUM UP, WE MUST ALL:

- › Listen attentively and considerately to our colleagues, employees and managers.
- › Respect the privacy of our colleagues, employees and managers.
- › Treat co-workers with respect in all circumstances.
- › Refrain from all forms of discrimination and harassment. This also covers relationships between employees and third-party stakeholders (customers, suppliers, service providers, etc.).
- › Report unacceptable behaviour using the internal whistleblowing procedures in place at each Oney Group entity.

TO SUM UP, EVERY MANAGER MUST:

- › Embody in their conduct respect for others, high standards and team spirit.
- › Foster trust and a sense of responsibility.
- › Be demanding, yet considerate.
- › Refrain from all forms of discrimination and harassment.

IN PRACTICE

 **You are being targeted on social networks following a press coverage linking Oney to the involvement of one of your business partners in a case of alleged tax fraud case. This is not true and you are tempted to react.**

What can you do?

It is frequently counterproductive to respond publicly online. Very often, joining in a controversy merely gives it greater energy. Instead, consult your manager, who will advise you on what to do.

Remember that you are not entitled to speak on the company's behalf unless you are authorised to do so and, above all, that banking secrecy also applies even when you are not inside the company.

Group employees must contact the External Communications department, which handles issues relating to reputational risk for Oney on social media and in the press.

IN PRACTICE

 **In your team, one of your female colleagues reports that a male colleague, also member of your team, made a sexist comment about her at a recent meeting. She thinks he didn't realise what he had said, and she didn't dare to tell him that it made her feel uncomfortable. She tells you about it.**

What should you do?

You must listen to your colleague and lend her your support. Then, if you consider it necessary and depending on the training you may have received in this area, you should ask the male colleague to come and see you so that you can talk about the issue of sexism. Should the situation occur again, you must inform the designated sexual harassment and sexist behaviour officers within the HR department, who will decide what action to take.

Principe 6 - Promote respect for employees and favour their professional growth.

Promote diversity and refrain from all discrimination

Respecting others and building trust are essential prerequisites to any sound professional relationship and necessitate the exclusion of all forms of intolerance, harassment or discrimination.

These conditions are based on several principles aligned with the values and culture we promote:

- › Employees' recruitment and onboarding;
- › Career mobility and/or professional development;
- › Managerial training;
- › Salary reviews;
- › Initiation of disciplinary proceedings;
- › Regular monitoring of KPIs to measure our diversity and inclusion practices.

Diversity and inclusion.

For many years, we have been committed to diversity and inclusion. Beyond simply complying with our legal obligations in this area, we see this as a key strategic priority for both the present and the future, in line with our corporate purpose.

These principles also reflect the diversity of our customers and of the environments in which we operate.

These principles are upheld by:

- › Creating and promoting a workplace and a business model that foster diversity and inclusion;
- › Raising awareness and training among the company's various stakeholders (employees, managers, executive officers, elected or appointed representatives, etc.) on issues and best practices in this area, particularly as part of:

Combat all forms of discrimination and/or harassment.

At Oney, we are committed to equal opportunities, and we have long been fighting against all forms of discrimination, be it related to race, colour, religion, gender, origin, age, disability or religious, political or philosophical beliefs.

With this in mind, all decisions made regarding recruitment, training and career opportunities must uphold these principles and be based solely on employment-related professional qualifications, skills and abilities. More generally, we are committed to ensuring that all human resources decisions made during employees' time with the company (from the moment they join until their departure) comply with these principles.

TO SUM UP, WE MUST ALL:

- › At our own level, ensure compliance with non-discrimination principles.
- › Demonstrate open-mindedness and respect other people's points of view.

IN PRACTICE

 **You have recently joined an Oney Group entity as a manager, and you will be required to take part in the recruitment process. You are aware that non-discrimination is important for the Group.**

What does this actually mean?

Recruitment is based on applicants' skills and experience; you must therefore choose the best candidate for the position in question and be able to justify your choice based on objective criteria, in accordance with the principles of non-discrimination.

Promote employees' employability.

At Oney, our ambition is to be a "learning organisation" and a "human-centric company", i.e. a company that places employees at the very core of its Talent Management systems.

Supporting our employees at every key stage of their professional lives is therefore a priority.

We wish every employee to take ownership of his employability and to be aware of the importance of continuously improving his professional knowledge and skills.

We are therefore committed to developing talents and to supporting their professional growth and personal development.

We encourage our employees to express their goals and expectations in order to foster a sense of loyalty, by offering motivating and realistic career development prospects that enable them to build their skills, while taking into account the company's economic reality.

TO SUM UP, WE MUST ALL:

- > Play an active role in defining our career paths and express our desires for future professional developments.
- > Feel responsible of our own employability.

Promote gender diversity and foster professional equality between men and women.

All Oney Group entities are committed to respecting and developing equal opportunities and treatment between women and men.

Beyond its legal obligations in this area, the Oney Group wishes to place professional gender equality at the heart of its commitments and of its inclusion and diversity policy.

The Oney Bank SA company's agreement on gender equality in the workplace aims to continue the momentum gathered so far to guarantee this equality as well as the quality of work life and working conditions.

Oney Bank SA reaffirms its commitment to the general principle of non-discrimination and to the principle of gender equality and condemns any behaviour or practice that could be deemed discriminatory towards employees.

In accordance with this principle, employees are treated based on objective factors, and in particular on factors independent of any gender-related criteria. The provisions of this agreement are designed to eliminate or, failing that, reduce as much as possible, any disparities observed, particularly in the following areas:

- > Recruitment and diversity in positions;
- > Career development and promotions;
- > Vocational training;
- > Balancing work and family responsibilities;
- > Effective pay.

Principle 7 - Act in a manner consistent with ethical business practices at all times.

Prevent and manage conflicts of interest.

The trust of our customers and all our stakeholders (e.g. partners, suppliers or service providers) is built on upholding the Oney Group's ethical principles. This principle to act with professional ethics embodies the key rules that Group executives and employees must follow in the performance of their duties. For each business line, these rules are reflected in the procedures of the Oney Group entities.

The Group relies on each individual's sense of responsibility to comply with these procedures and to act every day with loyalty, honesty and independence.

The Oney Group is committed to serving the interests of its customers and acting transparently. An unaddressed or poorly managed conflict of interest could harm the Group's reputation and each individual's personal interests.

TO SUM UP, WE MUST ALL:

- > Promptly identify and report any situations liable to lead to a conflict of interest with a customer and/or stakeholder.
- > Declare any external, family or close personal interests, as well as any corporate mandates held, to the Head of Compliance, and act accordingly.

IN PRATICE

 **A customer has just taken out a life insurance policy with his regular bank. Having no heirs, he would like to thank you for managing his account with Oney by naming you as the beneficiary of the policy.**

What should you do?

Under no circumstances may an employee accept to be a legatee, recipient or beneficiary of a customer's life insurance policy.

In such situations, employees must immediately inform their line managers, as well as their Head of Compliance, who will tell them how to proceed.

Fight against corruption and influence peddling at all levels of the company.

The fight against corruption and influence peddling is a priority for the Oney Group and its stakeholders. The Group applies a zero tolerance policy, both for administrators and senior managers and for employees.

An act of corruption consists of offering or accepting offers, promises, donations, gifts, for oneself or for others, to or from a public or private person, with the aim of obtaining an undue advantage. Employee decisions should never be inappropriately influenced.

TO SUM UP, WE MUST ALL:

- > Remain vigilant regarding the risks of corruption and influence peddling.
- > Report any suspicious situations to our line manager and to the Head of Compliance.
- > Comply with the internal policy on gifts and benefits and act in a totally impartial manner.

IN PRACTICE

 **A customer with an already-high level of debt and risk (high score) applies for a large loan. To intervene on his behalf, he offers you box seats for the next football match, as he is the club’s chairman.**
Can you accept his offer?

No, you must not accept it. This offer is attempted bribery. All decisions regarding the acceptance or granting of gifts and benefits must comply with internal procedures.



Fight against money or asset laundering and financing of terrorism.

The fight against money or asset laundering, tax fraud and financing of terrorism is a priority for the Oney Group.

All employees are required to complete mandatory training in this area and must strictly respect the procedures.

All Group entities are committed to applying the regulations and implementing the framework set up to combat money or asset laundering and financing of terrorism.

This framework also includes compliance with the rules governing embargoes and asset freezing.

TO SUM UP, WE MUST ALL:

- > Remain vigilant at all times and don’t keep a doubt or suspicion to ourselves.
- > Report any suspicious situations, regardless of the circumstances or the stakeholders involved, to our line manager and to the Financial Security department of our entity.
- > Comply with the procedures in force.

IN PRACTICE

 **A customer wants to repay his loan early. To do this, he makes several successive bank transfers totalling twice his monthly salary.**
What should you do?

The nature of the payments to be received by the customer must be clear and explicit. You must ask the customer about the origin of the funds and check that the explanation provided is consistent with his income.

If in doubt, you must contact the Financial Security team.

Principle 8 - Ensure the continuity of the Oney Group.

Protect the information and data of the Oney Group and its customers.

A risk appetite has been defined and implemented at the Oney Group's level and in each Group entity. It defines the level of risk that the Group will accept, in a given context, in order to generate recurring and resilient results by offering the best service to its customers and preserving the Group's solvency, liquidity and reputation, for the benefit of both its customers and its employees.

The Group behaves in a responsible and ethical manner when taking risks. It makes decisions from a long-term perspective, guided by the principles of consistency and prudence.

The Group ensures that the information published in its financial and non-financial documents is accurate. It undertakes to provide its customers and stakeholders with transparent, faithful and reliable information.

The Oney Group considers the protection of customers' personal data as a prerequisite for the pursuit of its business. It endeavours to use only information necessary to carry out its activity and undertakes to protect the confidentiality of personal data of its customers and employees.

TO SUM UP, WE MUST ALL:

- > Comply with banking secrecy rules.
- > Adopt a responsible conduct in protecting information, even after leaving the Group.
- > Only request and retain the data we need to perform our professional activities.
- > Comply with the security standards governing data and information protection.
- > Report any breach to the Data Protection Officer of our bank.
- > Protect the Group's reputation in the event of intervention on social media.

IN PRACTICE

 A long-term partner asks you to identify customers likely to be interested in a commercial campaign.

How do you react?

If you need to share confidential information with third parties, e.g. in the context of cooperation with a business partner, you must first contact your entity's Data Protection Officer.

It is essential to ensure that a confidentiality agreement exists with the partner and that the level of security provided by the partner is sufficient. Wherever necessary, the customers' prior agreement will be obtained.

In any case, you cannot make this decision on your own.

Ensure market integrity and comply with market abuse rules.

The integrity of financial market is essential for economic and social development.

By developing an internal culture based on everyone's integrity and sense of responsibilities, the Oney Group undertakes to protect the integrity of financial markets.

TO SUM UP, WE MUST ALL:

- > Be constantly vigilant to combat market abuses.
- > Thanks to an appropriate monitoring, report any suspicious situations to our line manager and to the investment services Compliance officer.

WE MUST REFRAIN FROM:

- > Use and disclose confidential and privileged information, either directly or indirectly.
- > Communicate false information to the market.

IN PRACTICE

 One of the Group's business partners is a listed company and tells you, in the course of a conversation, that his company will soon acquire its main competitor.

Are you entitled to share this information internally or to a close acquaintance for the purpose of making an investment?

Privileged information obtained in the course of your duties must neither be disclosed nor used for personal or professional purposes. All Oney Group employees are prohibited from exploiting, for their own account or on behalf of others, any non-public or confidential information they may hold.

Take risks in a responsible manner.

The Oney Group adopts a responsible and ethical behaviour in its risk-taking activities. Long-term interests are favoured over short-term ones, to ensure decisions are made following the principles of consistency and prudence.

Predetermined objectives are defined using both collective and qualitative criteria. The remuneration policies of the Group's entities incorporate these principles, particularly in the setting of objectives, in order to protect the company and its customers from risky individual behaviours.

TO SUM UP, WE MUST ALL:

- › Respect the risk policies and authorized limit framework.
- › Comply with delegated management schemes.
- › Favor consistency and prudence.
- › Keep in mind the continuity of the Group in all risk-taking decisions.
- › Discourage risky individual behaviours.

IN PRACTICE

 You are a customer advisor. A customer asks you to urgently set up a loan consolidation arrangement. This type of request cannot be processed automatically and requires a human decision to review the application. You do not have the authority for this.

What do you do?

You cannot exceed your level of authority. You must forward the request to the relevant lending manager, mentioning the degree of urgency, so you can respond to the request promptly.

Ensure the safety of individuals and business activities.

Oney Group considers safety in its premises to be of paramount importance. Any activity or anomaly liable to be a threat to the physical safety of an employee, customer or any other person entering the premises of an Oney Group entity must be reported.

Beyond the physical security of its premises, the Group's entities undertake to create a pleasant, harmonious working environment that facilitates interaction between employees.

Both individual and collective behaviours must be courteous in all circumstances.

Anyone working for or with the Oney Group has the right to a healthy and risk-free working environment.

TO SUM UP, WE MUST ALL:

- › Behave in a responsible manner to maintain a safe and healthy working environment.
- › Respect the rules governing the health, safety and hygiene protection at work.
- › Report to our business line any behaviour or situation liable to compromise security in the Oney Group's premises.





Social responsibility

Social responsibility

Principle 9 - Contribute to the development of a socially responsible market economy nsistent with human dignity.

The Oney Group is committed to a sustainable development approach, striving to minimise its ecological footprint while working to have a more positive impact on society.

Aware of the current environmental issues, the Oney Group has taken concrete measures to integrate sustainability into its activities by drawing on essential elements of its corporate culture: inclusion, diversity and solidarity.

At the Oney Group, we firmly believe that finance should serve people, not the other way around. That is why we are so committed to offering solutions that respect our customers' interests, enabling them to consume more responsibly and thoughtfully.

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 leading financial partner when for the circular economy and the energy transition.

In Portugal, Oney and the Non-Governmental Development Organisation (NGDO) Sol Sem Fronteiras have been promoting a financial education programme in schools with various education levels over the last four years.

IN PRACTICE

 **A customer is in financial difficulty and informs you that he is finding it hard to repay his loan.**

Do you feel concerned by this situation?

Yes, because Oney is committed to financial education and preventing over-indebtedness, by sharing advices and tips on how to better manage a budget through its social media platforms.

Oney has also prepared a budget guide for the general public, available on its website, oney.fr, and its mobile app. In partnership with Crésus, Oney has been working since 2013 with a network of associations to implement concrete measures in order to support people in vulnerable financial situations.

The aim is to prevent financial difficulties and provide support to customers who may face them.

Principle 10 - Be a banking group that is socially inclusive and open to all.

Some of our customers may go through difficult times. We are at their side at such moments to define together solutions enabling them to put their financial difficulties behind them.

The Oney Group is committed to supporting its clients not only in bringing their project to fruition, but also in practicing sound and more responsible financial management. As part of this, we support initiatives that help our customers better understand and manage their budget on a daily basis.

We take preventive measures with individual customers to avoid them from getting into financial difficulty. We pay attention to reaching out to them, listening to their concerns, offering simple solutions (payment breaks, debt consolidation, etc.), and referring them if necessary to dedicated support teams.

Managers, as well as customer advisors, share a special responsibility to provide the best possible support to customers in difficulty. A customer who overcomes difficult times will remember the trust built with Oney and share his experience with others.

Since September 2020, we have been running a programme with expert advisors from the Crésus network to help our employees detect, manage and assist vulnerable customers.

We also do everything we can to accommodate customers with a disability by adapting and personalising our services and interactions.

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

IN PRACTICE

 **A customer contacts you to tell you he is struggling financially. He is looking for solutions to get through this difficult time, as he fears he may no longer be able to meet his repayments.**

What solution can you offer him?

First of all, you must listen attentively and with empathy to this customer, who is facing hardship. Then, you should check if he has an insurance policy that could cover this type of situation and help him meet his repayments.

If he does not have insurance, you should refer him to the team dedicated for welcoming, supporting and following up with customers at risk of potential over-indebtedness or financial difficulties. They will help him find the most appropriate solution (e.g. payment break) to prevent him falling into arrears.

IN PRACTICE

 **During a conversation, a customer mentions the case of his visually impaired daughter, saying that she feels there is no consideration of her disability from her current bank.**

What can you suggest to him?

You can mention Oney's accessible services (audio-guided confidential cash withdrawals and Braille keypads at ATMs, bank cards with Braille and a notch to help identify its orientation, etc.) and suggest that you talk to his daughter about how her specific needs can be taken into account.



Principle 11 – Take effective steps to protect the environment and facilitate the transition towards a low carbon economy.

In response to the challenges posed by climate change and sustainability, the Oney Group is accelerating the adaptation of its activities with the goal of expanding its impact-driven solutions to all its clients.

To this end, the Oney Group benefits from the support of its two shareholders, BPCE and ELO, who share the same commitment to empowering employees through their activities and projects to support clients' environmental transition.

The Oney Group has thus incorporated strategic priorities into its sustainability roadmap, such as supporting all its clients in their environmental transition, expanding its sustainable refinancing strategy to secure the resources needed to achieve its goals, and accelerating the reduction of its own carbon footprint.

IN PRACTICE

 **One of your business partners specialising in installing blinds tells you he wants to set up a repair service.**

How do you react?

When discussing his project, you highlight the circular economy as a key driver of the environmental transition, as well as the increasingly strong customer demand, and the fact that Oney is very active in this area. You look therefore, within Oney's range of products and expertise, for specific solutions that will support and promote him, and deliver financing solutions for his customers.

IN PRACTICE

 **A customer contacts you about financing renovations at his home. He has heard about the financial incentives that are available if he includes energy efficiency features in his project. However, he is not entirely clear on what this involves and doubts that banks are particularly keen to support such initiatives.**

How do you react?

You explain that government grants are available and that he can find out everything he needs to know by contacting his local France Rénov' information service. You also confirm that Oney offers financing solutions through partner craftsmen, including a zero-interest energy retrofitting loan, and tell him you will be happy to help set up financing for his project.

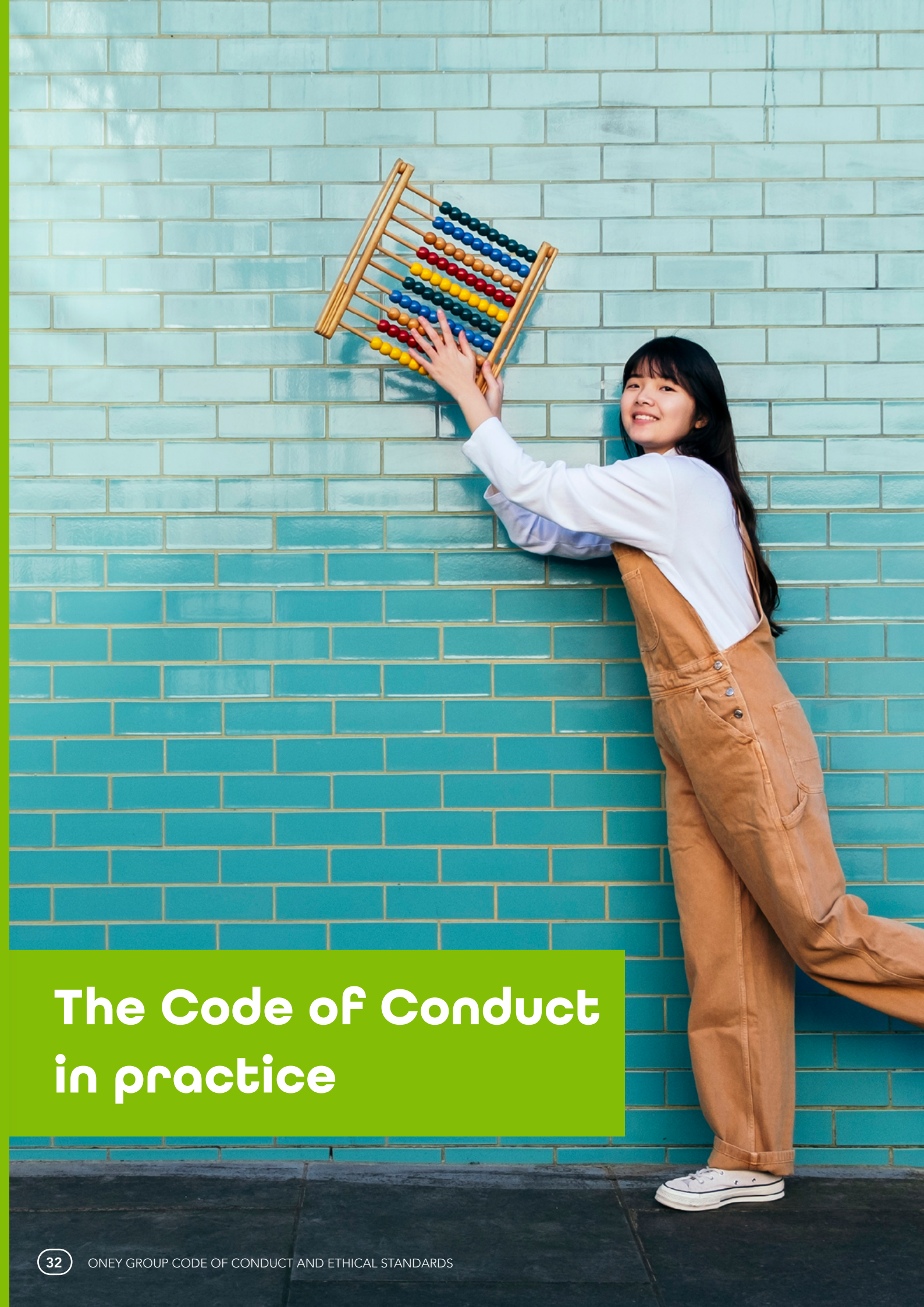
Principle 12 – Promote Human rights in the pursuit of all our activities.

We strive to ensure that all our stakeholders comply with the precepts of Human rights, whether they are internal (employees, senior managers and administrators) or external (customers, suppliers, investors, commercial partners and business introducers), in all the countries where Oney Group is present, whether in France or abroad.

We are committed to taking into account in our activities, any societal requirements liable to arise from new technologies or changes in society.

The Oney Group expects its suppliers and subcontractors to commit to applying the fundamental principles of the United Nations Global Compact in the field of Human rights, working conditions, environmental protection, and fight against corruption. For its part, the Oney Group undertakes to respect the principles of fairness and transparency in its relations with its suppliers by ensuring fair treatment throughout the selection process.





The Code of Conduct in practice

The Code in practice

The trust of our customers, employees and society at large is gained and consolidated through day-to-day relationships, behaviours and – at times – difficult decisions that each of us is required to make in the pursuit of his or her professional activities.

It is important to give employees guidelines to help them make the right decisions when faced with contradictory instructions.

Provide employees with guidelines to make the right decision.

The aim of this Code of Conduct and Ethical Standards is to provide every employee with help in making a decision when he or she is faced with a dilemma that makes it difficult to identify the long-term interest of the customer or of his or her entity*.

By providing a Group perspective, it supplements any internal codes or charters of conduct adopted by the various Oney Group entities.

Employees must at all times find meaning to their professional activities. The certainty that they have made a fair decision, in accordance with the law and the values of their entity, drives motivation and a sense of personal fulfilment. This code of conduct must help them to exercise this discernment and to come out of their isolation when they need to raise questions or express concerns.

Legal obligations represent a first benchmark of critical importance in choosing the right option. There exist – as is proper – a large and varied number of these obligations imposed to guarantee the efficiency and robustness of the banking system. The Oney Group entities have also adopted internal regulations that supplement or clarify these frameworks.

In the event of uncertainty about their legal obligations, about the application of a rule, employees must be able to quickly find the information or advice they need within their company, especially from the Head of Compliance.

But legal or regulatory obligations do not always provide a satisfactory answer given the rich diversity of situations in which employees are liable to find themselves. Ultimately, it is up to the individual employee to exercise judgment about the consequences of his or her decisions for the different direct or indirect stakeholders, the medium- and long-term implications of these decisions and their compliance with the values defended by the company.

This Code of Conduct and Ethical Standards is designed to provide all employees with these essential guidelines.

It presents the commitments made by Oney Group in its capacity as a major player in life of the economic and society at large, on the basis of which it accepts to be judged both within and outside the company.

This code describes the rules of conduct derived from it, illustrated by concrete situations in which employees may well find themselves.

This Code of Conduct and Ethical Standards forms an appendix to the company's internal regulations. Any failure to comply with these rules may expose employees to disciplinary actions.

** The Code of Conduct and Ethical Standards applies to all Oney Group entities.*

Although this code is intended to help employees reach decisions, there cannot exist an individual rule for each specific situation. Consequently, in case of doubt, it is essential to base your actions on your individual sense of ethical responsibility. If you are uncertain about what you intend to do,

ask yourself the following questions:

01. Is it legal?

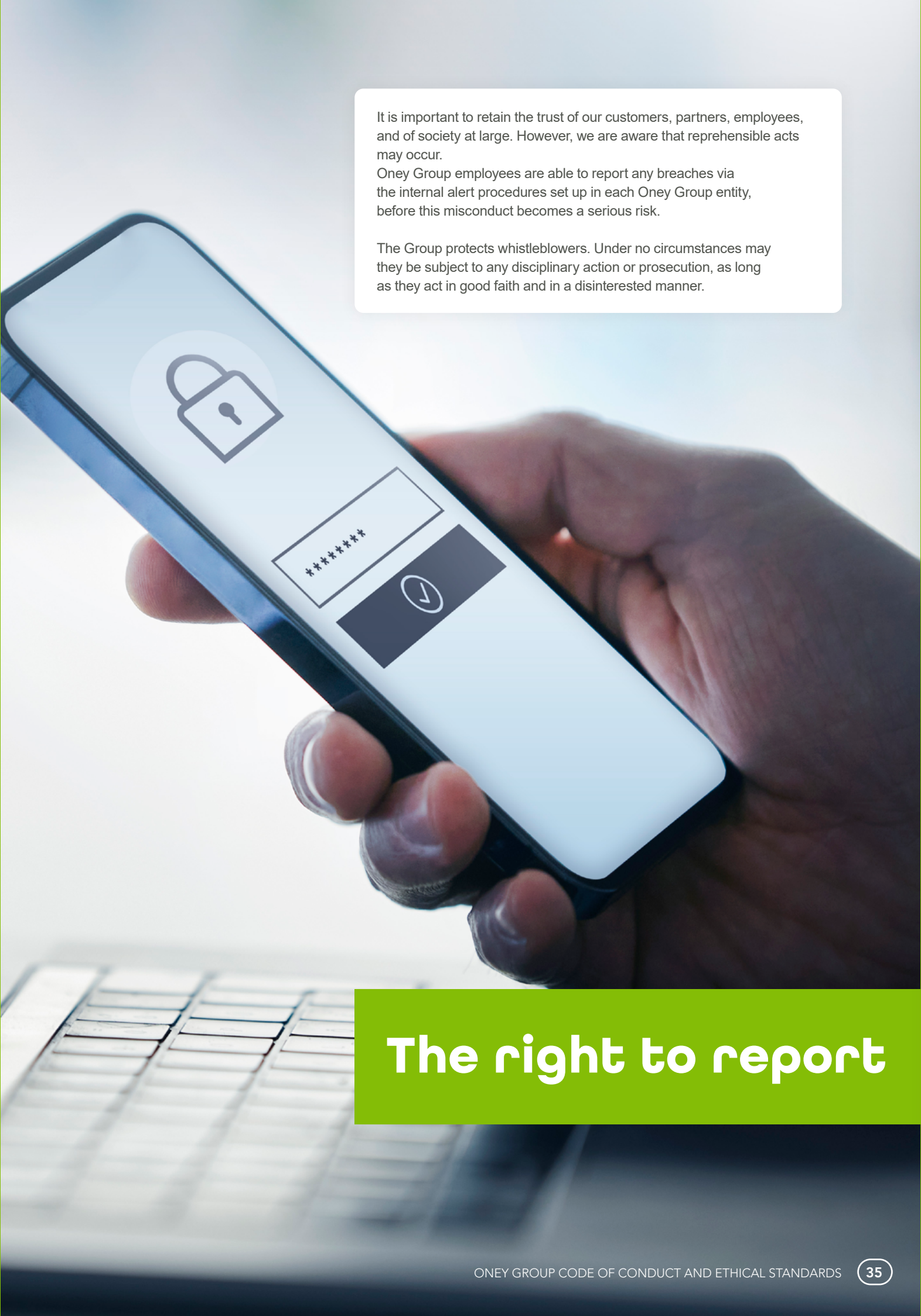
02. Does it comply with our policies and procedures?

03. Does it comply with our corporate culture, which promotes the interests of our customers over the long term?

04. Would I be comfortable explaining my decision to a third party (a regulator, a magistrate) or if I read about it in the media?

05. Have I considered all the risks at stake for my entity or for the Oney Group?

If the answer to one of these questions is NO, or if you have any doubt, don't hesitate to consult the appropriate people: your line manager, the Head of Compliance or the relevant manager at your entity (Compliance, Legal, Human Resources, Sustainable Development department, etc.).



It is important to retain the trust of our customers, partners, employees, and of society at large. However, we are aware that reprehensible acts may occur.

Oney Group employees are able to report any breaches via the internal alert procedures set up in each Oney Group entity, before this misconduct becomes a serious risk.

The Group protects whistleblowers. Under no circumstances may they be subject to any disciplinary action or prosecution, as long as they act in good faith and in a disinterested manner.

The right to report

Oney - Code of Conduct and Ethical Standards - January 2026

*Oney Bank - Public limited company (SA) with share capital of €71,801,20534
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