

# Code of Ethics and CSR

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# Message from Management

We are so much more than France's top insurtech group and a global leader in insurance and reinsurance.

We are more than 300 men and women who are passionate about their profession, from different backgrounds and walks of life, and we are proud of this richness. Diversity is our group's highest value. It's in our lifeblood and shapes our identity into a true, one-of-a-kind corporate culture.

For more than 30 years, our strategy has been defined by our high standards, which has enabled us to keep our good standing with our customers. Day in and day out, our standards drive us at all levels. It guides our projects, informs our decisions, and energizes all of employees in their work. This Code of Ethics and CSR is a natural extension of our concern for the highest standards and formalizes our commitment to placing ethics and sustainable development at the heart of our strategy, management methods, and business practices.

Our principles of ethics and CSR consist of four simple messages: act in accordance with laws and regulations, cultivate a culture of integrity, demonstrate loyalty and honesty, and respect one another. These messages are aligned with our group's values of trust, sharing, diversity, and daring.

Our Code is part of an ambitious global value system, and it supports our long-term vision for harmonious development. We rely on each and every one of our employees to share these principles in their day-to-day activities so that Prima Solutions goes beyond simple economic performance by remaining a company with which our employees, customers, and partners are happy to work. This is how we can ensure sustainable growth and development.



Hugues Delannoy  
President

A blue ink handwritten signature of Hugues Delannoy.



Julien Victor  
CEO

A blue ink handwritten signature of Julien Victor.

# Contents

Contents .....	2
1. Principles and Ethics .....	3
1.1. Regulatory Compliance.....	3
1.2. Our Values .....	3
1.3. Privacy Policy.....	3
1.4. Business Practices .....	4
1.5. Integrity and Ethics .....	4
1.6. Relationships with Stakeholders .....	4
1.7. Corruption .....	4
1.8. Financial Documents .....	4
1.9. Intellectual Property Protection .....	4
1.10. Protection of the Company's Image .....	5
2. Employer .....	6
2.1. Equal Treatment among Employees.....	6
2.2. Gender Equality Index.....	6
2.3. Diversity .....	6
2.4. Psychological Harassment.....	7
2.5. Sexual Harassment .....	7
2.6. Health and Safety.....	7
2.7. Fight against Unreported Work.....	7
3. Environmental Commitments.....	8
3.1. The Environment.....	8
3.1.1. Reducing Environmental Impacts .....	8
3.1.2. Waste.....	8
3.1.3. Energy.....	8
3.2. Community .....	8
3.2.1. Involvement in Associations.....	8
3.2.2. Education and Training.....	8
4. Alert System .....	9

## 1. Principles and Ethics

### 1.1. Regulatory Compliance

Prima Solutions agrees to comply with:

- The United Nations Universal Declaration of Human Rights of 1948 and its two additional covenants (the International Covenant on Economic, Social, and Cultural Rights and the International Covenant on Civil and Political Rights);
- The Fundamental Conventions of the International Labor Organization (ILO), including Convention C138 and the ILO Declaration on Fundamental Principles and Rights at Work;
- The United Nations Global Compact;
- The Athens Ethical Principles, adopted on January 23, 2006.

### 1.2. Our Values

Prima Solutions has forged a strong corporate culture built around four key values shared by all employees.

- **Trust**

We place our trust in our employees, in exchange for rigour and professionalism. We are committed to doing our best to be worthy of the confidence that our customers put in us and to offering them the best possible service that characterizes our brand image.

- **Sharing**

Mutual assistance and solidarity values are supported by a constructive and unifying team spirit that shapes our identity as a group. We promote knowledge management and experience sharing among employees, in order to continuously enrich our expertise.

- **Daring**

We encourage our employees to dare to take initiatives, acknowledging the right to make mistakes. Curiosity and critical thinking guide all of our projects, as we believe that it is crucial to be able to continuously reinvent ourselves.

- **Diversity**

We attach particular importance to diversity, as our talents come from around the world, with a wide variety of backgrounds. We believe that diversity drives creativity, and we facilitate internal mobility in order to offer each individual a career path that suits their ambition and help them fulfil their potential.

### 1.3. Privacy Policy

Independently of an obligation of respect and courtesy to all persons in the course of operations, each and every employee is generally bound to secrecy, discretion, and confidentiality regarding all information, including technical, sales, and business information. This obligation includes not disclosing to others any information and documents related to the operations, customers, and suppliers of Prima Solutions.

Everyone is responsible for learning the company's rules, particularly regarding the proper use of social media and information and communication technology.

## 1.4. Business Practices

We ensure that our trade partners and intermediaries are notified of our standards and commit to complying with them, particularly when they are meant to represent us in regions with a high risk of corruption.

Employees are asked to notify their direct supervisor if they become aware of any activities that violate our anti-corruption policy.

## 1.5. Integrity and Ethics

Prima Solutions strives to conduct its business in accordance with the principles of loyalty, integrity, equality, and fairness. It prohibits its employees and stakeholders from engaging in acts of corruption, profiting from corruption, engaging in anti-competitive behavior, or participating in money laundering operations.

## 1.6. Relationships with Stakeholders

Prima Solutions acts ethically, fairly, and professionally in its relations with all market stakeholders, including public authorities, partners, and competitors.

Prima Solutions shall comply with local, national, and international decisions and regulations.

The group agrees to provide accurate documents and complete information to authorities. It denies any association with any political party and does not provide funding to any public entity. Prima Solutions respects its partners, acts fairly and ethically with regard to them, and expects the same commitment from them.

The group agrees to protect all confidential and/or sensitive data belonging to its partners. Prima Solutions shall avoid any reprehensible act that could harm its reputation. It does not seek to obtain illegitimate information about its competitors.

## 1.7. Corruption

Prima Solutions strongly condemns corruption in its relations with all of its stakeholders. The company prohibits its employees from accepting or paying money and from accepting or providing any benefit to its stakeholders.

Prima Solutions expects its employees to comply with this principle and ensures that all transactions are correctly recorded.

## 1.8. Financial Documents

Prima Solutions agrees to provide accurate, honest, and clear financial information.

## 1.9. Intellectual Property Protection

For Prima Solutions, intellectual property is an intangible asset that is essential to its innovative work. The group protects its scientific knowledge, patents, trademark, and products and conducts its research and development activities with complete confidentiality. It respects the intellectual property of its stakeholders by condemning any practices that could cause any harm.

Its employees do not use software or other computer tools whose user licenses were not obtained by the company.

### 1.10. Protection of the Company's Image

Prima Solutions shall protect its interests and reputation by asking its employees not to disclose any information on behalf of the company without having expressly obtained authorization.

The company stresses that its image greatly depends on the behavior of its employees and expects that its employees will not engage in any actions that denigrate another employee, a product, or the company through social media or other telecommunication means.

## 2. Employer

### 2.1. Equal Treatment among Employees

Prima Solutions guarantees equal opportunity and treats each and every one of its employees fairly and respectfully. Founded on human success, the company is committed to supporting the development of its employees.

### 2.2. Gender Equality Index

As part of government measures to reduce pay inequalities between women and men, France's Professional Future Law of September 8, 2018 and the implementing decree of January 8, 2019 provide for the establishment of the gender equality law for all companies with more than 50 employees.

The index helps to evaluate the effectiveness of actions carried out to provide professional equality between women and men through four indicators:

- The pay gap
- Differences in individual raises and promotions
- Raises given to female employees upon returning from maternity leave
- The number of employees of the underrepresented gender (female or male) among the top 10 earners

Based on how the index is calculated, each indicator provides a number of points to companies to reach a maximum total score of 100 points. Companies that score below 75 points must implement corrective actions to bring their score up to at least 75 points within three years. Otherwise, companies will incur financial penalties of up to 1% of their total payroll.

For 2019, Prima Solutions calculated the index for both of its entities in France with more than 50 employees, achieving a score of 89/100 for Effisoft SAS and 76/100 for Prima Solutions SAS.

Beyond calculating this index, for which Prima Solutions scored above the recommended average under law for 2019, the company supports professional gender equality for the years to come.

### 2.3. Diversity

Prima Solutions considers the diversity of its talented employees to be a strength. The company supports diversity in Human Resources so that all employees can express their talents and thrive within the company.

The company agrees not to discriminate with regard to:

- sex
- health situation
- disability
- family status
- sexual preferences
- age
- political or philosophical opinions
- religious beliefs
- union activity
- ethnic, social, cultural, or national origin.

This non-discrimination applies both internally (during hiring and during decisions involving training and promotions) and externally (in our relations with stakeholders, including suppliers, customers, and business partners).

## 2.4. Psychological Harassment

Each and every one of us is entitled to respect and dignity. The company has zero tolerance for any form of harassment, including psychological and sexual harassment. Any behavior in violation of this principle that violates an individual's dignity is unacceptable.

Prima Solutions prohibits all forms of harassment and insists on respect and loyalty.

Any employee who has knowledge of or is the victim of such behaviors is asked to notify his/her supervisor.

## 2.5. Sexual Harassment

No practice or act undermining human dignity and integrity is allowed within the company, particularly any act or behavior taking the form of sexual harassment.

Any employee who has knowledge of or is the victim of such behaviors is asked to notify his/her supervisor.

## 2.6. Health and Safety

Prima Solutions shall ensure that its employees work in pleasant and respectful environments with proper health and safety conditions.

The company also ensures that its actions do not cause any risk to its employees or any other stakeholder.

## 2.7. Fight against Unreported Work

Prima Solutions is committed not to engage in unreported work and ensures that its subcontractors comply with agreements against unreported work.



## 3. Environmental Commitments

### 3.1. The Environment

#### 3.1.1. Reducing Environmental Impacts

Prima Solutions is committed to preserving the environment and aims to comply with applicable standards and legislation.

Prima Solutions seeks to reduce its environmental impact on a daily basis. This includes a zero-paper policy and recycling (paper, coffee grounds, etc.).

The company encourages travel by means of public transportation by reimbursing its employees for 50% of their transport pass expenses. The company also provides its employees with secure bicycle storage and is easily accessible to public transportation.

#### 3.1.2. Waste

On a daily basis, Prima Solutions produces waste equivalent to “household waste,” as well as “office and computer equipment waste.”

To implement a reduced impact policy, employees are instructed on sorting their waste.

#### 3.1.3. Energy

As part of its operations and to allow its employees to work under pleasant working conditions, Prima Solutions consumes energy to maintain its computer network and its servers.

The company is considering future options with respect to energy consumption.

### 3.2. Community

#### 3.2.1. Involvement in Associations

Prima Solutions is committed to the community and supports general interests through sponsorships. Through its involvement with Mécénat Chirurgie Cardiaque, the company contributes each year to surgeries for children around the world with heart defects.

#### 3.2.2. Education and Training

The company partners with the Ecole Supérieure d'Assurance to provide students with its insurance application platform to help them learn how to use the digital tools of their future profession.

#### 4. Alert System

Any employee confronted with a situation that may violate the principles mentioned in this Code of Ethics should speak up and report the situation to Prima Solutions management, who guarantees the confidentiality of all reported information.