



Diversity, Equity, and Inclusion (DEI) Policy

Introduction: Our Commitment to DEI

The SPB Group is committed to integrating Diversity, Equity, and Inclusion (DEI) into our core operational, leadership, and decision-making practices. This policy outlines our dedication to translating these principles into concrete measures that reinforce equity, promote plurality within our teams, and ensure coherence in our leadership standards. Our goal is to cultivate a respectful, inclusive, and fair environment for all our stakeholders, reflecting our core values and our role as a responsible corporate citizen.

This policy is grounded in key international human rights frameworks, including the Universal Declaration of Human Rights, the Charter of Fundamental Rights of the European Union, and our commitment as a signatory of the United Nations Global Compact. We uphold the Ten Principles related to Human Rights, Labour, Environment, and Anti-corruption across all our operations.

Guiding Principles and Shared Commitments

Our approach to DEI is built on a foundation of shared principles that guide our actions and define our culture.

- **Safe and Dignified Work Environments:** We are committed to guaranteeing safe, respectful, and dignified working conditions where all individuals can thrive without fear of judgment or exclusion. The SPB Group maintains a zero-tolerance stance against child labor and forced labor in any form.
- **Continuous Improvement:** We pursue continuous improvement by conducting annual reviews of our DEI policies and processes, ensuring they remain relevant and aligned with the evolving expectations of our society and workforce.
- **Exemplary Leadership:** We empower our leaders to champion DEI by providing training in diversity, inclusive leadership, and Human Rights, ensuring they lead by example and foster a culture of respect.
- **Ethical Accountability:** We provide accessible and reliable ethical alert channels that allow any member of the SPB team to propose improvements or confidentially report barriers to inclusion.

Key Areas of Action

Our commitment to DEI is put into practice through a dedicated action plan focused on embedding these principles throughout the entire employee lifecycle and beyond.

SPB

SAS de courtage d'assurance au capital de 11 000 000 euros.

Siège social : 71 quai Colbert - CS 90000 - 76095 Le Havre Cedex - Tél. : +33 (0)2 32 74 20 20

Immatriculée au RCS du Havre sous le n° 305 109 779 et à l'ORIAS sous le n° 07 002 642 (www.orias.fr). Soumise au contrôle de l'ACPR.



- **Fair and Inclusive Talent Management:** We ensure that our processes for recruitment, selection, onboarding, and development are fair and equitable. From the first point of contact, we strive to provide an inclusive experience, using bias-free language and standardized evaluation criteria to ensure all candidates are assessed on their skills and potential.
- **Equal Opportunity and Development:** SPB provides equal access to training, professional development, and promotion opportunities for all employees. We actively work to identify and eliminate potential inequalities, including addressing the gender pay gap and supporting work-life balance for everyone.
- **A Culture of Respect and Anti-Discrimination:** We enforce robust anti-harassment and anti-discrimination protocols to ensure a work environment where all individuals are treated with dignity. Through regular climate surveys and confidential reporting channels, we monitor our work environment to uphold our standards.
- **Extending Our Values:** Our commitment to DEI extends to our external partners. We promote the integration of DEI principles in our relationships with suppliers and strategic partners and encourage our teams to engage in social and volunteering initiatives that support inclusion and community well-being.

Scope and Applicability

This policy applies to all entities and activities of the SPB Group. It covers all individuals associated with SPB, including employees, managers, and temporary collaborators, as well as our suppliers and strategic partners. Its principles are embedded in all phases of the professional lifecycle at SPB, ensuring a consistent and unwavering commitment to Diversity, Equity, and Inclusion across the entire organization.

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