



## Human Capital and Human Rights Policy

### Introduction: Placing People at the Heart of Our Performance

At SPB, we believe that our sustainable success is built on the fulfillment and engagement of our employees. This policy outlines our commitment to creating a company where every individual has the opportunity to progress, contribute, and thrive in a respectful, healthy, and safe working environment. By placing people at the heart of our performance, we create lasting value for our employees, clients, and partners.

Our Human Capital and Human Rights Policy is founded on clear and concrete principles: attracting and developing talent, ensuring fairness and transparency, promoting diversity and inclusion, and guaranteeing a work environment built on trust, responsibility, and unwavering respect for human rights.

### Human Capital Management: Our Core Commitments

We are dedicated to fostering a positive and empowering workplace through the following commitments:

- **Attracting and Developing Talent:** We are committed to recruiting diverse profiles based on skills, potential, and motivation. We provide each employee with opportunities for training, growth, and the development of their expertise throughout their career at SPB.
- **Fostering a Motivating Work Environment:** We ensure respectful, stimulating, and well-adapted working conditions that enable everyone to perform at their best. We are dedicated to continuously improving the quality of life at work for all our teams.
- **Promoting Diversity and Inclusion:** We are convinced that diversity and inclusion are key drivers of sustainable performance and creativity. We value the plurality of backgrounds and experiences, as they enrich our collective strength. Our commitment is to ensure equal treatment and gender balance at all levels of the organization and to maintain a zero-tolerance policy towards any form of discrimination or harassment.
- **Ensuring Fairness and Transparency:** Our recruitment, development, and remuneration processes are guided by objective criteria directly linked to contribution and performance, ensuring that our practices are fair and transparent.
- **Health, Safety, and Well-being at Work:** The health, safety, and well-being of our employees are top priorities. We are committed to providing a healthy, safe, and fulfilling work environment, with a strong focus on risk prevention and the promotion of work-life balance.

#### SPB

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

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



## Human Rights: Our Unwavering Principles

SPB places the utmost importance on the respect for human rights in all our practices and professional relationships. In line with the Universal Declaration of Human Rights, the fundamental conventions of the International Labour Organization (ILO), and the UN Guiding Principles on Business and Human Rights, we are committed to promoting and protecting the dignity of every individual.

Our principles include:

- **Respect and Dignity:** Every employee, partner, and client must be treated with fairness and respect.
- **Prohibition of Forced and Child Labor:** We maintain a zero-tolerance policy for forced labour and child labour in any form.
- **Freedom of Association:** We respect the right to collective representation and social dialogue.
- **Responsible Value Chain:** We require our suppliers and partners to adhere to our high ethical standards and respect for human rights.

## Scope and Applicability

This policy applies to all entities and activities of the SPB Group, in all countries where we operate. It is a foundational document that guides our actions and reflects our commitment to being a responsible employer and corporate citizen. We are dedicated to continuously reviewing and strengthening this policy in line with regulatory developments and the expectations of our employees and stakeholders.

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