



RESPONSIBLE PROCUREMENT POLICY

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INTRODUCTION

The Ethias Group, a major player in insurance and ICT services, offers innovative solutions in the areas of protection, prevention, assistance, leasing, pensions, reinsurance and ICT services.

Built on values of solidarity, social and environmental progress, the Group aims to make a positive impact on society through each of its actions. It has therefore naturally placed sustainability at the heart of all its activities.

Since the products and services purchased from its suppliers directly influence its environmental, social and economic impact, Ethias seeks to work with partners who share its standards and expectations, in order to build a fairer and more sustainable future together.

OBJECTIVES

The purpose of this policy is to define the reference framework within which the Ethias Group integrates ESG criteria into its procurement process, as well as the requirements and expectations it sets for its suppliers.

INTEGRATING ESG CRITERIA INTO PROCUREMENT PROCESSES

Suppliers are selected following an objective evaluation based on selection criteria deemed essential to the Ethias Group's good reputation and the achievement of its sustainability ambitions.

In addition to the price of the product or service, its quality, delivery performance, lead time, after-sales service and the company's financial health, the Ethias Group integrates ESG criteria into its procurement process.

To this end, each tenderer is invited to complete an ESG questionnaire, the scoring of which will contribute to its overall rating.

In addition, depending on the nature and importance of the relationship the Ethias Group has with its suppliers, it reserves the right to request proof of compliance with the requirements set out below, such as:

- The communication of information necessary for the smooth running of the group;
- The use of certifications validated by recognised third parties.

REQUIREMENTS OF THE ETHIAS GROUP TOWARDS ITS SUPPLIERS

LEGAL COMPLIANCE

Suppliers shall comply with directives, laws, regulations and standards, including applicable environmental and social requirements, in the jurisdictions in which they operate.

BUSINESS ETHICS AND INTEGRITY

Ethias expects its suppliers to implement measures aimed at:

- The prevention of and fight against all forms of corruption, including bribery (whether offering, promising, giving, soliciting, agreeing to receive or accepting an undue advantage), as well as

facilitating payments or gifts intended to improperly influence another party for the purpose of obtaining or retaining business opportunities;

- The prohibition of all forms of anti-competitive practices;
- The prohibition of all forms of illicit activities such as money laundering, terrorist financing, human trafficking, slavery or the proliferation of weapons of mass destruction.

RESPECT FOR HUMAN RIGHTS AND LABOUR RIGHTS

Suppliers shall apply the United Nations Guiding Principles on Business and Human Rights. These Principles clarify the requirements for respecting, regardless of the countries in which suppliers operate, the principles of the Universal Declaration of Human Rights (adopted by the UN in 1948) and the Conventions of the International Labour Organization (ILO), in particular:

- The prohibition of the use of forced or compulsory labour and the mistreatment of their employees, including the prohibition of any form of modern slavery or human trafficking;
- The elimination child labour;
- Respect for health and safety by ensuring healthy, safe and decent working conditions and environment for their own personnel;
- The provision of decent wages and working hours by paying a minimum wage that meets basic needs, and complying with the regulations of the countries in which they operate in terms of working hours and rest periods.
- Respect for freedom of expression, freedom of association and the right to collective bargaining.

Ethias requires the supplier to sign the "Convention on compliance with the core principles of the International Labour Organization" (ILO) in call for tenders and/or upon the conclusion of each contract.

DATA SECURITY, SAFETY AND CONFIDENTIALITY

Suppliers shall comply with directives, laws, regulations and standards relating to the confidentiality of non-public information disclosed to them and to intellectual property rights, and shall protect personal data and confidential information against any unauthorised use, disclosure, access, loss, alteration, damage or destruction. To this end, suppliers shall have a documented confidentiality and data protection policy in place.

EXPECTATIONS OF THE ETHIAS GROUP TOWARDS ITS SUPPLIERS

To fully deploy its sustainability ambitions, the Ethias Group seeks to rely on supplier-partners committed to an approach similar to its own.

Ethias therefore recommends that its suppliers familiarise themselves with and, where possible, take concrete action in the following areas:

ENVIRONMENT

Ethias's suppliers are recommended to:

- implement due diligence policies and processes to identify, assess and mitigate environmental risks across all their operations;
- manage and, where necessary, reduce the impacts of their activities and products on the environment throughout their life cycle. This includes, in particular, the management of consumption (water, energy, raw materials), the reduction of greenhouse gas emissions, the prevention of pollution (water, soil and air), and waste reduction and recovery (reduction plans, sorting, recycling). Ethias

encourages its suppliers to commit to the Science Based Targets initiative (SBTi) in order to align with global best practices;

- identify and mitigate negative impacts on biodiversity and ecosystems, and seek, wherever possible, opportunities to contribute positively to biodiversity conservation and ecosystem resilience;
- encourage the sustainable use of land, responsible sourcing of natural resources and the protection of high conservation value areas within their value chain.

CIRCULAR ECONOMY

Ethias Group suppliers are recommended to adopt the principles of the circular economy in their activities and to collaborate with the Group to integrate these principles into their business models. This includes, in particular, prioritising waste reduction, reuse and recycling, as well as designing circular products and processes.

In parallel, suppliers are recommended to set targets for increasing their use of recycled and renewable materials and for minimising waste sent to landfill.

EQUALITY AND NON-DISCRIMINATION

Ethias's suppliers are recommended to commit to making no distinction, exclusion or preference based on gender, age, disability, ethnic origin, language spoken, sexual orientation, gender identity, religion or beliefs, neurodiversity, socio-economic background, or diversity of experience and career paths, by:

- Implementing practices that ensure unbiased recruitment;
- Creating a work environment in which workers are protected from any form of discrimination, threats, violence or harassment, including sexual harassment and intimidation, as well as any disruptive or inappropriate behaviour, whether physical or psychological;
- Promoting a work environment where equal opportunities are guaranteed, including equal pay for equal work;
- Promoting accessibility for employees and clients (for example, by ensuring that websites and online platforms can be used by people with visual, hearing or cognitive impairments, or by providing assistive technologies such as electronic magnifiers or voice recognition software to support employees with disabilities);
- Encouraging and demonstrating progress in diversity, equity and inclusion at all levels of the organisation, by involving all staff and fostering the authentic expression of each individual.

GOVERNANCE AND FOLLOW-UP

SCOPE

This responsible procurement policy applies to any person carrying out a purchasing act on behalf of Ethias or one of its subsidiaries, regardless of their location or activity, and commits to complying with this policy, the code of conduct and the company's ethical values at every stage of the procurement process and in every interaction with suppliers.

To this end, suppliers shall also promote and enforce the principles of this policy among their own suppliers and subcontractors.

FOLLOW-UP AND UPDATE

The policy is subject to regular monitoring to assess its relevance and effectiveness and to identify areas for improvement.

The policy is reviewed periodically, at least every three years, or more frequently in the event of legal, organisational or strategic changes.

OWNERSHIP AND RACI MATRIX

Scope	Topics	Responsible	Accountable	Consulted	Informed
Ethias Group	Drafting the Responsible Procurement Policy	Sustainability Ethias SA	EC	All departments involved (including Group entities)	
Integrating ESG criteria into procurement processes					
Ethias Group		Procurement and Business purchasing departments	The member of the Executive Committee responsible for procurement	All departments involved (including Group entities)	
Requirements of the Ethias Group towards its suppliers					
	Legal compliance	Procurement and Business purchasing departments	The member of the Executive Committee responsible for procurement		
	Business ethics and integrity	Procurement and Business purchasing departments	The member of the Executive Committee responsible for procurement		
	Respect for human rights and labour rights	Procurement and Business purchasing departments	The member of the Executive Committee responsible for procurement		
	Data security, safety and confidentiality	Procurement and Business purchasing departments	The member of the Executive Committee responsible for procurement		
Expectations of the Ethias Group towards its suppliers					
	Environment	Procurement and Business purchasing departments	The member of the Executive Committee responsible for procurement		
	Circular economy	Procurement and Business purchasing departments	The member of the Executive Committee responsible for procurement		
	Equality and non-discrimination	Procurement and Business purchasing departments	The member of the Executive Committee responsible for procurement		

FOR MORE INFORMATION

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