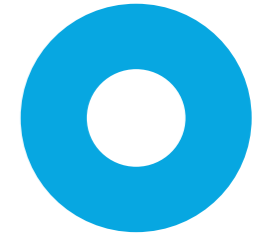


# Non-Financial Reporting Directive

EXERCICE 2022



Dear colleagues,

I am pleased to present My Money Group's Sustainability Report and to share with you the progress achieved in terms of sustainability, social and environmental responsibility, and corporate governance.

We are proud of our commitment and all the progress we have made over the past year. First and foremost, My Money Group has opted for a strong, forward-looking mission: collaborate to advance and achieve your goals. This mission is the result of a collaborative approach that perfectly reflects our values of adaptability, entrepreneurship, performance and cohesion, which guide us every day. This mission is fully in line with the sustainability strategy that our teams have formalized in 2022. We have decided to place it at the heart of our business model by fully integrating it into our corporate strategy and making it a pillar of development.

In order to define our sustainability strategy, we have held discussions with our stakeholders and we have set ourselves social and environmental objectives which are in line with the UN's Sustainable Development Goals.

Our strategy is based on 4 strategic pillars:

- We act as a committed employer (towards society and our employees) by promoting personal development, goodwill and supporting social commitment.
- We support ethical practices by working in a fair and ethical manner.
- We are committed to the planet by measuring and reducing environmental footprint.
- We innovate to support our customers and partners in their environmental transition through quality advisory and innovative offers.

All these achievements would not have been possible without the commitment and remarkable work of all My Money Group employees that I would like to thank most warmly for their efforts as well as our partners and customers for their trust and loyalty.

Finally, I would like to thank the Board of Directors and its members for their support, their time and their sharing of expertise on all these topics.

I hope you enjoy your reading.

# 2022 HIGHLIGHTS

JANUARY

## Financi'Elles

We have joined the Financi'Elles network, which is the leading federation of corporate networks promoting gender diversity within companies of the financial sector. The network's mission is to support and, above all, accelerate women's access to the top management in the financial sector.

Les entreprises sont en première ligne pour assurer l'égalité.

Notre Groupe rejoint Financi'Elles pour faire avancer les lignes dans le domaine de la mixité et de la parité professionnelle.



APRIL

## Earth Day

A week dedicated to sustainable development and raising awareness among our employees through quizzes and sharing eco-friendly gestures. Hosting of a MasterClass on climate for all employees by Antoine Denoix, CEO Axa Climate.

22 avril 2022  
Journée de la Terre  
Aujourd'hui ensemble, prenons des résolutions qui changeront notre demain.



MAY

## Run - Children without Cancer

Participation of our employees in the "Children without Cancer" race organised by the "Imagine For Margo" charity in Paris La Défense, to speed up research on pediatric cancers. 40 companies collected over 220 000€ donations.



MARCH

## Women's Day

Employees had the opportunity to talk to Virginie Delalande about prejudices, stereotypes and disability. They stroked the pose to show solidarity through the international theme #BreakTheBias



MAY

## My Climate School

Official launch of My Climate School at MMG. An online training to involve more employees on environmental issues.

“ With My Climate School, I like the « c'est pas sorcier » approach which plays down the subject: it was fun learning in 7 minutes and surprising to discover the consequences of some of my habits. It made me want to move my habits.  
Caroline

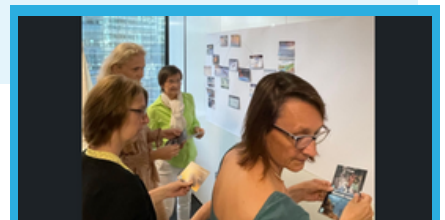
”



JUNE

## Climate Mural

First Climate Mural for MMG's climate ambassadors in Nantes and Paris.



# 2022 HIGHLIGHTS

JULY

## Launch of My Green Team

First meeting of our sustainability ambassadors to promote sobriety actions, boost participation in MasterClasses, and build cohesion around climate and environmental issues.

**MyGreenTeam**  
Réseau d'ambassadeurs engagés pour l'environnement

SEPTEMBER

## Mix My Group

Elle By MMG created in 2021 by Andreea Manuela Danci, Kwatar Adlani and Charlotte Donadieu Leroy to promote diversity becomes Mix My Group.

**MIXmygroup**  
Le réseau diversité et mixité de mymoneygroup

SEPTEMBER

## Ambassadors' Training on Climate Murals

About twenty employees have been trained to become Climate Mural ambassadors.

They will moderate Climate Mural events to raise employees awareness on climate issues.



OCTOBER

## Octobre Rose ("Pink October")

My Money Group is once again committed to #OctobreRose through a number of initiatives : Fund raisings, photo challenges, solidarity races and a MasterClass with the Seintinelles charity.

Thanks to the efforts of all employees, over 4 000 km were covered, which enabled the Group to donate 3 674 € to the Ligue Against Cancer and 5 000 € to the Curie Institute.



NOVEMBER

## Café Joyeux

As part of the European Employment week of people with disabilities, we invited Thomine de Bournet to a MyMasterClass to talk about the Café Joyeux initiative. These cafés-restaurants employ and train people with mental and cognitive disabilities.

Semaine Européenne  
pour l'Emploi des  
Personnes en situation  
de Handicap 2022



1120  
mymoneygroup

DECEMBER

## World Climate Day

For World Climate Day on December 8th, we organised a Masterclass with Antoine Poincaré (VP Axa Cliamte School) on COP 27 which took place from the 6th to th 18th of November 2022.

8 décembre  
Journée Mondiale  
du Climat

Agir aujourd'hui  
pour préserver demain !



1120  
mymoneygroup

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# 01

Statement of  
non-financial  
performance

# 1

## The regulatory environment

### The legal bases of requirement for a statement of non-financial performance

Since the financial year ending on 31 December 2018, the requirement for a statement of non-financial performance has replaced the report on corporate social responsibility (CSR) in order to enable dynamic reporting appropriate to each economic player.

The Order 2017-1180 of 19 July 2017 transposed the European CSR directive (Directive 2014/95/EU on disclosure of non-financial and diversity information by undertakings) into French law, and defined the content and scope of the statement of non-financial performance. The Order reviewed the scope of the entities concerned and simplified the arrangements for verification of the published information by focusing on large undertakings. Subsidiaries are now exempted individually where their information is presented by the parent company in a consolidated report.

As a financial holding company, Promontoria MMB ("the Company"), the parent company of My Money Group, is therefore subject to these disclosure obligations regarding its non-financial performance, since it exceeds the consolidated thresholds established by article R.225-104 of the Commercial Code.

The scope of the present statement of non-financial performance consequently corresponds to the financial consolidation scope of Promontoria MMB as presented below and with

the limitations presented for each indicator in the note on methodology.

In consequence, the obligations set out in articles L.225-102-1 and L.511-35 of the Monetary and Financial Code (amended by Order 2020-1142 of 16 September 2020), R.225-104 (amended by Decree 2020-1742 of 29 December 2020), and R.225-105-1 of the Commercial Code (amended by Decree 2017-1265 of 9 August 2017) are applicable to Promontoria MMB as the consolidating reporting entity, and to the entities within its consolidation scope, together forming "My Money Group" (the Group).

The company Promontoria MMB has appointed KPMG S.A. as an independent third party charged with verifying, in accordance with the provisions of article R.225-105-2 of the Commercial Code, the compliance of the present statement of non-financial performance and the accuracy of the 2022 information it contains.

This statement will be appended to the Promontoria MMB consolidated management report for 2022, submitted for validation to the Board of Directors of the reporting Company on 26 April 2023. It will be available for consultation on the Company website for a period of five years.

### Statement contents and procedure

In accordance with the requirements for the statement of non-financial performance, the Company presents its business model along with the main non-financial risks and challenges facing its activities.

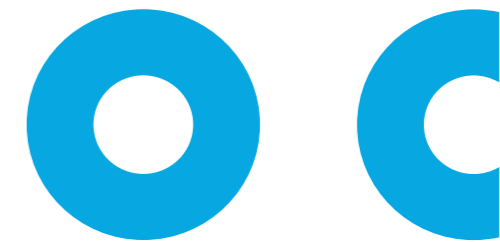
My Money Group has desired to strengthen its approach to non-financial responsibility by integrating it more closely with its activities. To this end, the Group produced its materiality matrix in 2022 to identify the non-financial risks to which it is exposed throughout its value chain.

This step is additional to the risk mapping already conducted by the Group (strategic, credit, financial, operational and compliance risks, etc.) in accordance with the applicable banking regulations.

**Details of the whole process are given in Part III. 4. Strategic Outlook of this document. Non-financial risks and challenges have been identified through four steps :**

- **definition of the scope of non-financial risks and challenges** : identification of the risks and challenges that could have a significant impact on the Group, or which the Group entails for society in the broad sense. Identification was based on the results of the Group's CSR reporting, the challenges facing the sector, emerging global issues and a list of CSR challenges taken from

ISO 26000, in consultation with the Group's various departments. This work enabled us to ensure the consistency of the risks identified with the Group's business sector, geographic locations and key issues.



- **prioritisation** of non-financial risks and challenges through talks with internal and external stakeholders.
- **risk assessment** : each risk was subjected to an assessment using the same approach as that applied by the Group's risk department. All risks were therefore assessed against two criteria: the inherent likelihood of the occurrence of the risk and the extent to which this risk is controlled.
- **prioritisation of risks** : prioritisation of risks: based on these risk assessments, we then worked together to identify and rank several priority non-financial risks which are summarised in the present statement. The Group's risk mapping (RCSA) is reviewed and validated annually by the Executive Directors and then by the Boards of Directors of each My Money Group entity on the recommendation of the Risk Committee.

To address the risks and challenges thus identified, the Group relies on existing policies and those implemented in 2022 and on targeted initiatives, an integral part of its Sustainability strategy, leading to general or specific measures, the methods and results of which are presented in this report.

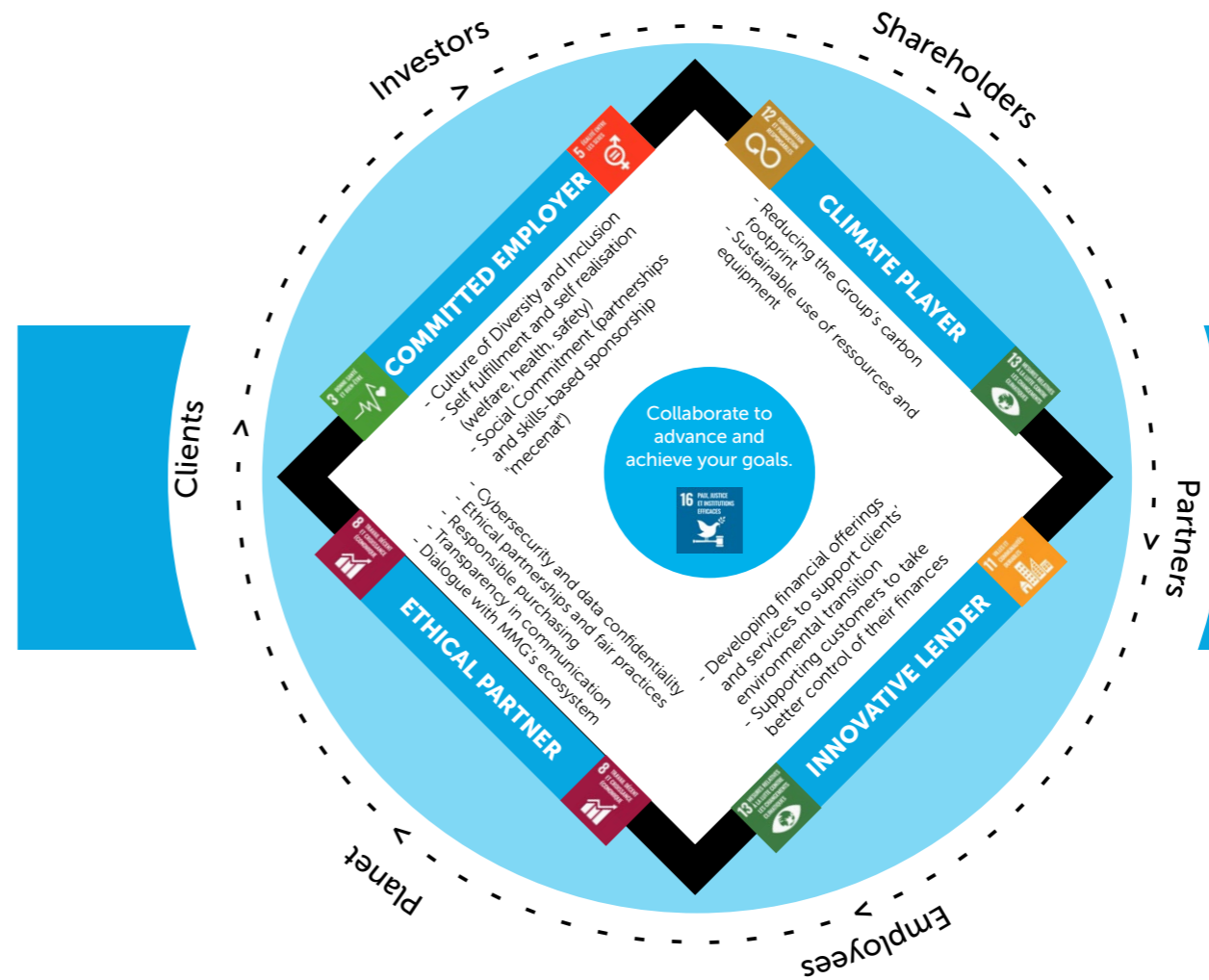
The information is then expanded under four headings, covering the main non-financial risks and challenges facing the Group in employment, social and environmental terms.

- **Committed employer** : This section presents the Group's internal employment policy designed to attract and retain talented staff, supporting them throughout their careers and enabling them to develop. An ambitious training policy enables the Group to ensure that its staff are trained so as to guarantee the highest service level, the dissemination of its values and ethics, and their personal development.

- **Ethical partner** : This section covers the risks and challenges associated with market activities and environments. Exposed to the new dynamics of the financial industry, the Group is continuously adapting to the new ways in which banking products are consumed, inter alia through digitisation.

Desirous of distributing its products with respect for the regulations and for its codes of conduct in terms of ethics and values, the Group is a responsible player in the banking world

- **Climate player** : The environment section addresses environmental issues, the measure of the Group's carbon footprint and its sustainable use of resources and equipment.
- **Innovative lender** : Here we look at the issues involved in supporting our customers and partners in their environmental transition



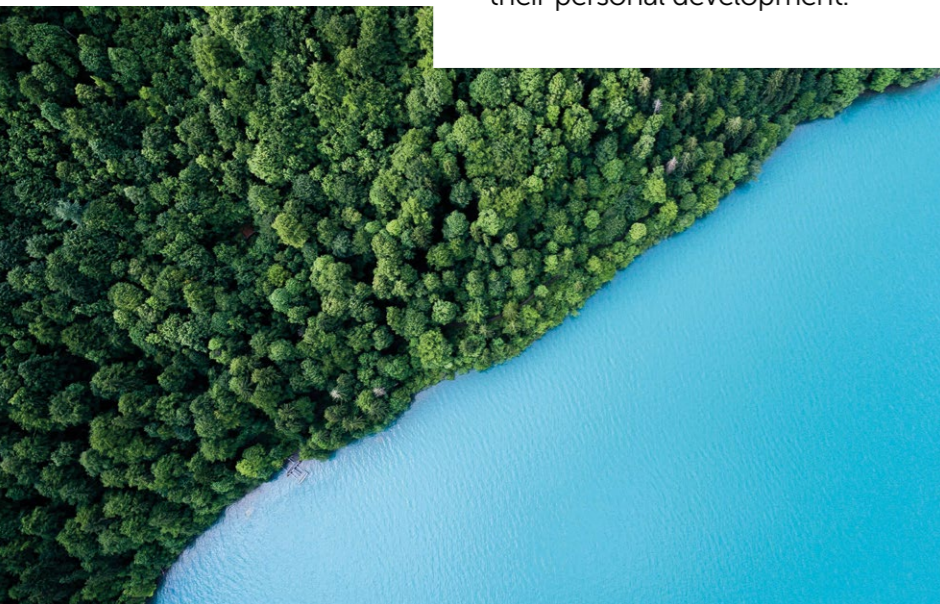
The present statement only addresses aspects applicable to the Group's activities and business model. Consequently, the following topics are not developed :

- **waste and food insecurity** : at the Tour Europlaza site at Paris La Défense, housing the registered offices of the Company and some of its subsidiaries, the inter-company restaurant is managed independently of the Group. For the other sites or entities, dedicated and equipped cafeterias are provided for staff ;
- **responsible, fair and sustainable food choices** : the inter-company restaurant at the Paris La Défense site is managed independently of the Group, so measures to encourage responsible, fair and sustainable food choices are taken by the site

manager, in some cases in association with user companies ;

- **circular economy** : this does not directly affect the Group, which nevertheless ensures that its activities are conducted in a way that limits the consumption and waste of raw materials, such as paper and non-renewable energy sources ;
- **respect for animal welfare** : the Group has no direct nor indirect reason to deal with animal issues.

Although these topics are not expanded upon in its non-financial performance statement, the Group acknowledges their importance in general terms.





## 2 Scope of the statement

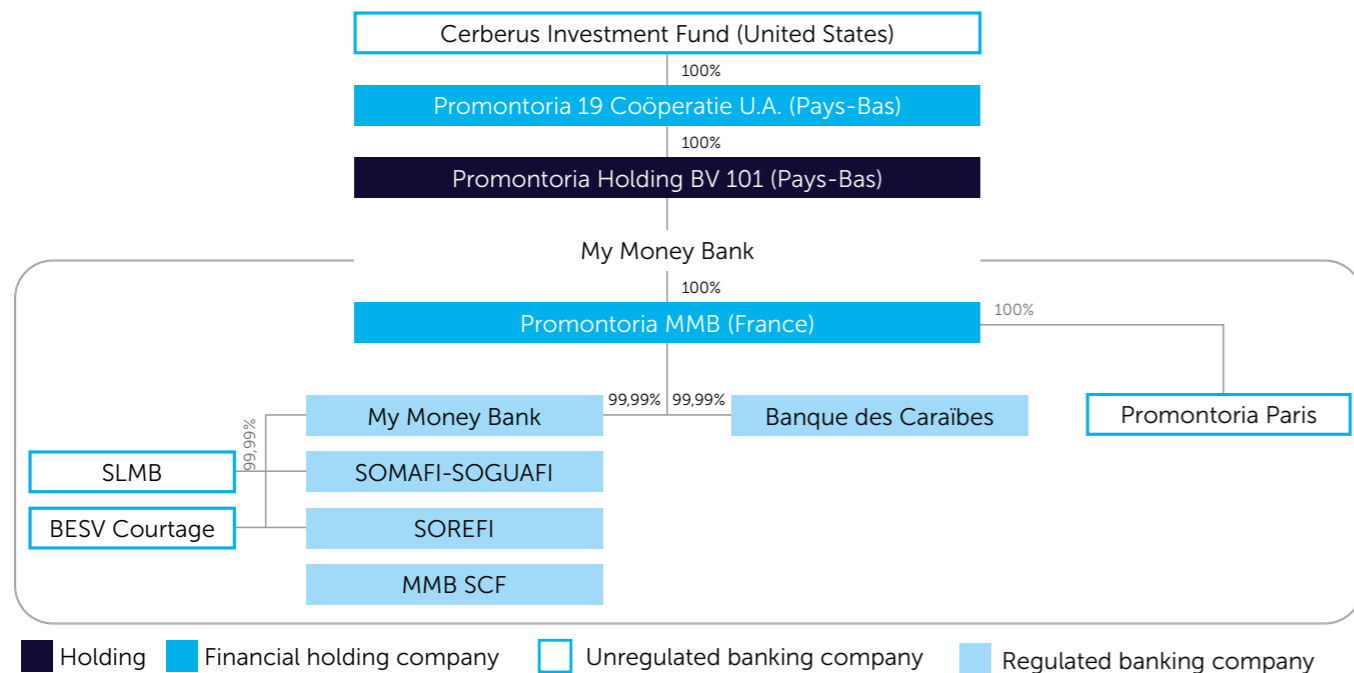
As explained above, the regulatory scope of the statement of non-financial performance is the consolidation scope of the financial holding company Promontoria MMB and all its operational subsidiaries, subject to the limitations specified in the note on methodology below.

As the present statement relates to the 2022 reporting period, it will consequently cover all the operational entities included in the Group's consolidation scope as of 31 December 2022. These entities are :

- The credit institution My Money Bank and its overseas subsidiaries (Sorefi and Somafi-Soguafi) approved as financing companies, and its subsidiary MMB SCF, an issuer for covered bonds (société de credit foncier), and
- The credit institution Banque des Caraïbes

My Money Group has a total of 958 staff members, distributed as :

- Promontoria MMB : 8 employees,
  - My Money Bank : 589 employees,
  - Somafi-Soguafi : 126 employees,
  - Sorefi : 103 employees,
  - Banque des Caraïbes : 132 employees.
- The entity MMB SCF has no employees.



## 3 Introduction to My Money Group

My Money Group (the "Group"), relying on a century of existence and know-how, has operated as an independent entity since its exit from the General Electric group. It is now affiliated with the private investment company Cerberus Capital Management L.P., founded in 1992 and based in New York.

For several years, the Group has been developing a strategy for growth, both organic and external. Historically active in the specialised finance market, the Group operates as retail bank since its acquisition of the Banque des Caraïbes. My Money Group has confirmed its intention to diversify its activities by strengthening its presence in this market on a larger scale with the announcement in June 2021 of its plan to acquire the French retail banking business of HSBC Continental Europe ("HBCE").

**The Group's organisation is therefore now built around two divisions :**

- the "Specialised finance" division, consisting of My Money Bank and its subsidiaries, and
- the retail banking division, currently consisting of Banque des Caraïbes.

These two divisions rely on shared central services (Finance, Legal, Compliance, Audit, etc.) but are managed independently and autonomously in order to preserve the specific nature of each.

To promote sound governance within the Group, the Boards of the various Group entities have a duty, aside from determining the direction of the business and overseeing its implementation, to be the guarantors of a shared ambition: to achieve excellence in terms of regulatory compliance and customer protection. To this end, My Money Group has adopted the governance standards of the French and European banking supervisors, establishing — alongside the Promontoria MMB audit committee — a risk committee, an appointments committee and a remuneration committee operating at Promontoria MMB and My Money Bank level.

The Promontoria MMB Board of Directors has eight members representing three different nationalities. 75% of them are women, and most are independent directors.

In late 2021, My Money Group set up an ESG committee. This committee brings together several members of the Group's Board and Executive Committee. It meets quarterly. The first meeting of the ESG Committee was held on 1 February 2022.

In 2022, a CSR/ Sustainability department was created in order to structure and implement My Money Group's Sustainability strategy. CSR (Corporate Social Responsibility) refers to the contribution of business to the challenges of sustainable development.

The role of this department is to contribute to the inclusion of environmental, social and governance criteria in the bank's major policies, in a manner consistent with ISO 26000 reference.

Whether in the financial or the non-financial field, all the companies within the Group share standards of operational excellence, regulatory compliance and professional ethics. These aspects are reflected in the values that guide the Group's administrators and staff in their day-to-day actions.

## 4. Group values and identity



The Board of Directors and the Group Executive Committee share the same conviction: the success of My Money Group depends on the behaviour of each and every one of its staff. The objective is to benefit from the commitment of all staff and to earn the trust of its customers, partners, investors and shareholders. To do so, it is necessary to be scrupulous in the application of laws and regulations. However, the Group aims to go further, ensuring that every decision demonstrates a deep awareness of ethical responsibility thanks to a corporate culture built on solid values and applied with rigour.

This is the spirit underlying the Group's Code of Conduct. It sets out the values and principles which guide the enterprise. It was drawn up through a collaborative approach with contributions from staff in mainland France and in the overseas territories. The aim is to encourage adherence to these values by all, management team and staff alike, in order to pursue our efforts for transformation and growth while remaining the worthy heirs of our hundred-year history.

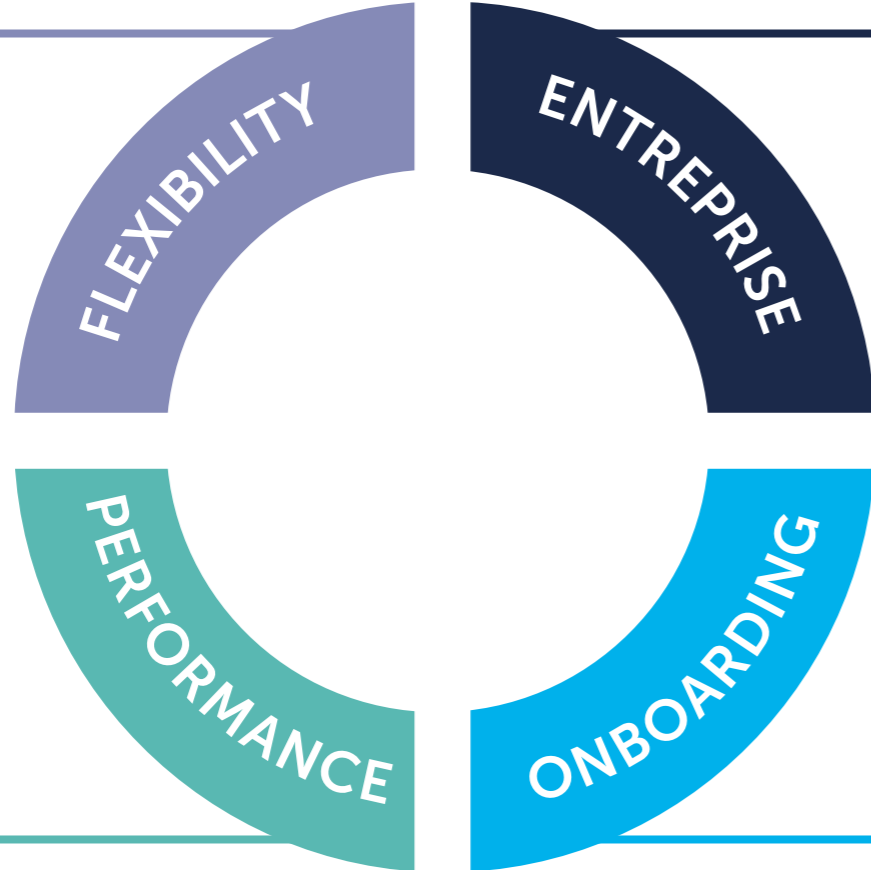
Affirming its strong commitments in its Code of Conduct illustrates MMG's desire to continue to be a responsible player, building our future and our successes on a solid basis of professional ethics and integrity.

# INTEGRITY & EXPERTISE



- Managing change
- Being on the lookout
- Investing in talent and training

- Seizing each growth opportunity.
- Testing, sharing and deciding with agility
- Innovating with both our employees and our clients



- Capitalising on our results-oriented culture.
- Placing profitability at the heart of value creation.
- Meeting and exceeding the company's objectives

- Recognising our employees' sommitment
- Communicating in complete transparncy
- Committing ourselves to respect and diversity

These values are also perfectly reflected in the My Money Group Mission: Collaborate to Advance and Achieve your Goals.



# 02

Our business model

# 1 A model that creates value

The Group's business model is developed in consultation with the various My Money Group departments (Finance, Communication, Human Resources, Sustainability, Compliance, Legal, Trade, Marketing, General Services, etc.). It is then reviewed by My Money Group's Executive Management before being submitted to the Company's Board of Directors for approval following recommendation by various committees, including the Audit and ESG Committees.

Today, the Group is based on two core business activities. Firstly, it has been developing its specialised financing activities for many years — in mainland France with debt consolidation and professional real estate loans (mortgage), and in the French overseas departments with vehicle and consumer loans. Secondly, the Group has entered the retail banking world with the acquisition of the Banque des Caraïbes. This business, still modest in Group terms, is intended to become a pillar of its growth, particularly with the ongoing acquisition of HSBC France's retail banking business.

The Group has demonstrated its ability to optimise and increase the profitability of its various activities, drawing on the expertise of its teams and simplified operational processes. This simplification has been achieved in recent years through the far-reaching digitisation of its operational methods, as the Group strives to remain at the forefront of technological developments in the banking world. This will continue to be the preferred approach in the context of the acquisition of HBCE's French retail banking business.

For marketing its products, the Group has long given preference to the development of partnerships with leading players in each of its markets. In mainland France, it relies on a network of more than 300 independent brokers to distribute its debt consolidation and savings products. In the French Overseas Departments, its vehicle finance is marketed directly through dealerships. For savings, the Group has also developed partnerships with FinTechs in France and Germany to diversify its distribution channels beyond its historical partners. Finally, in conjunction with its acquisition of HBCE's retail bank network in France, the Group has signed a partnership agreement with the major specialist Arkéa Banking Services to handle operations on its IT platform in order to offer customers and partners the best standards in terms of quality of service at the best cost. The Group thus remains at the forefront of the transformation of distribution channels in the banking industry.

## OUR FIGURES

**17,4%**  
Solvency ration

**€ 237 M**  
NBI<sup>1</sup>

**950**  
Employees

**€7 053 M**  
in outstanding loans

**30 000**  
Depositors<sup>2</sup>

**235 000**  
Customers

1. NBI : Net banking income  
2. Excluding depositors via Deutsche bank

## OUR BUSINESS LINES

### Debt consolidation

Debt consolidation solutions, with or without mortgage guarantee

### Personal loans

Solutions to support customers in achieving their projects (Personal loans, revolving credits, insurance)

### Savings

A range of savings products distributed through a partner network of asset management advisers

### Vehicle finance

A complete range of finance for individuals and businesses

### Professional real estate financing

A range of finance to help professionals to achieve their projects

## OUR DISTRIBUTION CHANNELS

### Direct in-branc distribution

Head office and 12 branches (DOM)

### Remote direct distribution

73 advisors

### Distribution through intermediaries

732 distributors

## OUR VALUE PROPOSAL

- Simple customised credit solutions
- A group of experts with years of experience. A close, responsive partner, adaptable to customers needs
- A respectable player contributing to the growth of credit in mainland France and in the DOM

## OUR SUSTAINABILITY PILLAR

Committed employer  
Social commitment

Climate player  
Investment for the planet

Ethical partner  
Acting to promote ethical practices

Innovative lender  
Innovating for your projects

## OUR BUSINESS

**mymoneybank**

€916 m volume in 2022  
€3 702 m in outstanding loans  
67 200 Customers

**mypartnerbank**

€752 m volume in 2022  
€1 821 m in outstanding loans  
1 500 Customers

**Somafi-Soguafi**

€242 m volume in 2022  
€575 m in outstanding loans  
72 000 Customers

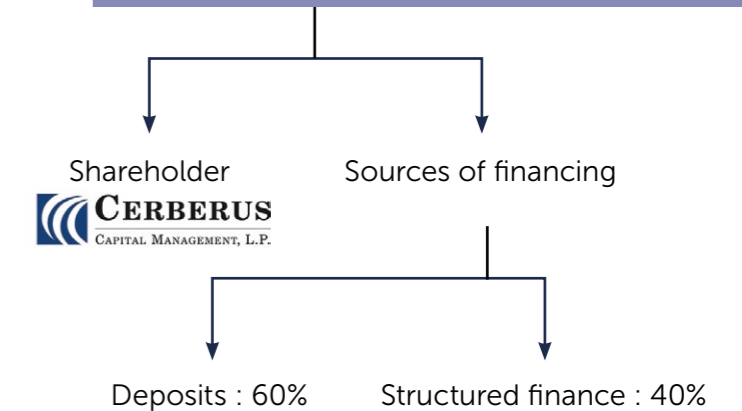
**BANQUE DES CARAÏBES**

€108 m volume in 2022  
€407 m in outstanding loans  
18 000 Customers

**Sorefi**

€221 m volume in 2022  
€548 m in outstanding loans  
76 000 Customers

## OUR INVESTORS



# 2 Our Business Lines

The Group offers its finance and savings activities to both private individuals and corporate customers. Its growth is focused on the financing of the real economy both in mainland France and overseas via a network of almost 700 business provider partners or directly to its customers. At 31 December 2022, outstanding customer loans (credit) amounted to €6.9 billion. Total deposits in the Savings business stood at €4.5 billion.

My Money Group's main locations are :

- **Paris La Défense** (PMMB-MMB registered offices) with more than 270 employees,
- **Nantes** (MMB Centre for Operational Excellence) with more than 354 employees,
- **Antilles, Guyane et Réunion**, with almost 321 employees.

## My Money Group is active in the following business lines :

### Debt consolidation

A significant player in the debt consolidation business, My Money Bank offers individual customers, directly or through its distribution partner banking intermediaries, a complete range of debt consolidation schemes for housing and consumer loans, with or without mortgage guarantees, with customised loan consolidation schemes (senior, independent professionals, life events, finance for new projects). Debt consolidation solutions are available in France and overseas.

### Professional real estate finance

As a partner specialising in short-term financing for real estate professionals, My Money Bank works alongside market players of all kinds (realtors, developers, etc.) across all asset classes in the Ile-de-France region (residential and office property, commerce, logistics, etc.) and in the main French cities (Nice, Lyon, Bordeaux, Lille, etc.).

### Structured finance

As a traditional player in the private equity segment, My Money Bank has 20 years' experience in leveraged buyouts and supports its customers in structuring securitisation transactions by acting as custodian for securitisation funds (FCTs), although it is gradually withdrawing from this business line following a strategic review of its activities. My Money Bank has had no further role as an FCT custodian since 31 March 2022.

### Savings deposits

Deposit-taking enables My Money Bank to meet its banking licence obligations, but also contributes to the refinancing of its lending activities.

**My Money Bank offers a range of high-performance savings products intended for private individuals and professionals :**

- **term accounts ;**
- **"Livret" Accounts** interest-bearing savings accounts (available to

private individuals and non-profit organisations).

My Money Bank relies on numerous partnerships with independent wealth management advisers (CGPI) and on its internal teams for the distribution of investment offers. Currently the savings products are available in mainland France and in Germany through a partnership with a FinTech.

### Retail banking

The Banque des Caraïbes performs all the tasks of a retail bank, (current operations management, cash management and financing needs) by offering a range of standard banking products.

The deposit-taking and loan distribution activities are intended for individual customers, professionals and local enterprises (SMEs, family groups) and/or subsidiaries of large national or international groups.

The Banque des Caraïbes also operates as an investment services provider, mainly managing securities accounts and distributing insurance products. However, these two business lines are not significant.

### Equipment and motor vehicle finance

As a major operator of vehicle financing in point-of-sales, with its overseas subsidiaries — Sorefi in Réunion and Somafi-Soguafi in Martinique, Guadeloupe and Guyana — My Money Group offers the following services through the intermediary of its distribution partners :

- **consumer solutions** in credit sales and leasing with a purchase option,

- **solutions for companies and professionals**, with a range of products enabling decision-makers to carry out the investments essential to business growth: industrial and agricultural equipment, IT and office equipment, transport, handling, building, public works and vehicle fleets (credit sales, leasing and defiscalised products).

### Consumer credit

Overseas, the Group offers a range of personal loans to satisfy all the needs and projects of its private customers :

- motor vehicles,
- household appliances,
- works,
- travel.





## Insurance policies

The My Money Group companies, in their capacity as insurance agents or brokers, offer insurance policies and additional services to support their financing for private individuals, professionals and businesses :

- borrower's insurance,
- financial loss insurance,
- the mechanical breakdown and assistance guarantee (repairs, towing assistance, replacement vehicles) .

# 3 Integration of My Money Group in the banking industry

My Money Group is active in the banking industry specialising in finance for private individuals and businesses and in retail banking overseas, as well as debt consolidation, deposit-taking and business real estate financing in mainland France.

This scope of activity constitutes a specific segment in the French banking and finance industry.

In terms of competition, this segment is shared between large French banking institutions operating through subsidiaries specialising in these activities, and specialist independent players such as My Money Group in mainland France and/or overseas.

My Money Group's particular geographic locations, with its background in the overseas departments, make it more difficult to conduct a strategic and competitive analysis.

## Activities in mainland France :

- Debt consolidation is a very specialised segment on which My Money Bank has partly based its reputation. As a major independent and historical player at the national level, My Money Bank justifies its specialist status in this segment. By offering private individuals debt consolidation solutions both with and without a mortgage guarantee, My Money Bank meets the needs of a wider customer base than some of its direct competitors.
- Professional real estate finance is offered by many banking institutions. My Money Bank, conducting this business under the MMB Real Estate brand, stands out from its competitors through its advisory

expertise, enabling it to support its customers in implementing innovative and high-performing packages. Its rapid execution, the expertise of its teams and the quality of its service make it a recognised market player for professionals in the sector.

- Deposit-taking is an activity dominated by the major national and international banking networks. My Money Bank is the Group's main driver of this business, whose steady growth reflects the market's growing interest in the product offering. The Group's savings products are marketed both directly and through a network of specialised partners in France and abroad (mainly in Germany). A strategic activity for the financing of our banking Group, deposit-



# 4 Strategic Outlook

taking is expanding to support the ambitions described above.

## Activities overseas

- Consumer credit is a market shared between generalist banking institutions acting through dedicated subsidiaries and specialist players such as our entities Sorefi and Somafi-Soguafi. The consumer credit segment is strongly correlated with the level of household consumption. With a wide range of consumer loans, the overseas subsidiaries support their customers to finance equipment purchases and personal events and have become leading players, recognised by local households.
- Lending to professionals, mainly for professional equipment, is highly dependent on levels of activity in the local economy.

In the overseas departments, because of their historical involvement and their strong commercial activities, each of My Money Group's specialised entity is a major player with a local market share of more than 20%.

Thanks to their local presence, the subsidiaries are familiar with the particular nature of their markets. This means that they can offer adapted products, and provide flexible support to their finance customers, not least in the event of the extreme climate events which occur in these areas.

The Group's presence and product

offering in the Antilles/Guyana were strengthened by the March 2020 acquisition of the universal bank Société Générale de Banque aux Antilles-SGBA, now Banque des Caraïbes.

In the various markets discussed above, the Group faces disruptive trends from FinTech players, as do all its competitors. This name covers innovative enterprises which, using the new technologies, are reshaping banking and finance offerings and consumer habits.

In response to the challenges represented by the new technologies in terms of both implications and risks, the Group has been conducting a controlled technological shift over the past two years. It is a responsible, modern and digital player in a fast-changing industry.

The Group's strategic plan is based on four strategic priorities :

1. Pursuing our growth
2. Constantly supporting our partners and customers
3. Preparing to integrate hsbcc france's retail banking operations and staff into the group, and the rebirth of the ccf brand
4. Acting as a responsible corporate citizen towards our staff, customers and partners

In 2022 the group made significant progress towards the achievement of this plan.

## Pursuing our growth

This priority depends on four lines of approach :

### Continued growth and commercial activity

The growth of the Group is a strategic priority. It aims to improve the Group's operational efficiency, as measured by the cost/income ratio. The challenge is to increase the Group's revenue base while leveraging existing infrastructure, the exceptional expertise of our teams and our technological investments.

This growth naturally relies on the Group's organic development, resulting from the structural growth of the markets in which it operates, its commercial dynamism enabling it to gain market share, and the diversification of the financing offer in order to expand the range of products and services offered.

The Group also wishes to achieve external growth via targeted acqui-

sitions in a disciplined manner and as opportunities arise. The challenge is to invest in activities that complement the existing business lines, are drivers of growth and meet the profitability targets and rigorous risk management criteria in order to optimise value creation over the long term.

This desire for targeted external growth was previously given effect by the acquisition of BESV (renamed My Partner Bank) in 2018 and the Société Générale de Banque aux Antilles, renamed Banque des Caraïbes, in 2020. It can be seen even more significantly in the planned takeover of HSBC's retail banking business in France. This acquisition is expected to take place in the second half of 2023 and will result in a fourfold increase in the size of the Group's balance sheet.

In its main debt consolidation market, MyMoneyGroup is targeting controlled growth by consolidating

its already high market shares in the with-mortgage guarantee loan segment and strengthening its positions in the without-mortgage guarantee segment.

This commercial dynamism goes hand in hand with a strict risk policy and the preservation of the Group's commercial margins and profitability. It is supported by the digitisation of processes (the «Transfo DC» project), which was completed in 2020 and which ensures a degree of commercial responsiveness that exceeds the market standards. The initial impact of this strategy could be observed in 2021 and 2022, with excellent commercial results.

The same digitisation strategy is being rolled out in the overseas subsidiaries (the "GROM" project) with equally tangible results.

### Continuing to enhance our refinancing

Since the change of shareholder in 2017, My Money Group has implemented a strategy aimed at ensuring its complete independence in refinancing terms, diversifying its investor base and reducing its financing costs. The aim is to support the commercial growth of its business lines. This strategy takes the form firstly of continuous growth in the deposit base and secondly of regular issues in the capital markets.

In 2018 the Group established a covered bonds issuing entity (MMB SCF), which by the end of 2022 had issued €2.1 billion in covered bonds to external investors, with maturities of

between seven and twenty years. My Money Group is also an active issuer in securitisation markets through its Auto ABS SapphireOne Auto programme.

The deposit base continued to grow in 2022. Deposits account for nearly two-thirds of the Group's refinancing. This sustained deposit growth can be explained by :

- the diversification of distribution channels through partnerships with FinTechs (Cashbee in France) enabling it to expand its international customer base (RAISIN-Deposit Solutions in Germany),
- the appeal of our saving products to individual and corporate investors;
- high-quality and long-standing partnerships with a rich network of wealth management advisors (CGP).

### Improving the cost/income ratio

The Group has set a target of optimising its organisation and procedures while increasing its revenue base in order to bring its operating ratio into line with the best market standards (60%). To this end, the Group has made significant investments in the modernisation of its information systems and digitisation of its processes in order to increase operational efficiency and commercial responsiveness. Simplifying both the activities and the organisation should also lead to significant productivity increases and is a strategic priority.

In the medium term, the planned acquisition of HSBC France's retail banking business could accelerate



the expected economies of scale. It would allow significant growth in the Group's balance sheet and revenues. At the same time, the Group aims to ensure sound cost control: first by leveraging as much as possible its existing infrastructure and teams, already sized to handle a higher volume of activity; and secondly by establishing collaborations with external partners that are recognised in the French banking market and capable of providing an excellent quality of service under optimum financial conditions.

### Increasing profitability (return on equity)

Profitability is a priority for the Group, which aims to raise the return on equity above 10% in the medium term. The priority accorded to the profitability of our business lines has led us to withdraw from some activities in recent years (mortgage loans for individual customers, vehicle loans in mainland France, private banking & audio-visual financing by the former BESV, etc.) in order to focus on more profitable business lines. The priority accorded to the profitability of activities is also reflected in the particular attention given to the following essential aspects :

- Strict pricing: the Group aims to achieve commercial growth and increase in market share while maintaining its trading margins,
- Competitive financing costs: the Group has introduced tools for each of its business lines enabling them to refinance under favourable conditions (covered bonds, securitisation, etc.),
- The growth of ancillary income (insurance, etc.),
- Ongoing control of the credit risk, scale efficiencies and simplification of the organisation and internal procedures,
- Investment in new technologies and in digital.

## Serving our partners and customers better than ever

Information system modernisation and technological transformation are at the heart of the strategy implemented by the Group. To better satisfy the needs of its customers, the Group is acquiring the resources to achieve its ambitions in terms of digitisation. In 2018, the Group launched an investment plan of around €40 million over a three-year period for a technological transformation focusing on the following priorities :

- **Digitisation of sales processes** : Improvements to “time to answer”, dematerialisation of documents, and automation of document analysis and scoring system. Modernisation of technological tools and the optimisation of information systems, web-oriented architecture, the simplification of finance applications and the roll-out of a scalable architecture. Optimising and digitising the customer journey: e-servicing, smartphone applications.
- **Roll-out of the AGILE methodology** for internal project management: this strategic choice enables the Group to respond better to the risks involved in its overall digitisation plan, to optimise its staff’s performance and cohesion, and to ensure continuous change.
- **Creation of the Data Factory**, a department dedicated to the management of the Company’s «Data» topics (data science, data governance, data intelligence, data management), to support the growth of business activities;

In addition, in April 2022 MMG finalised the overhaul of the infor-

mation system for the Savings business in partnership with the FinTech Mambu, and the construction of portals dedicated to customers and partners, thus improving their autonomy in managing and monitoring their accounts.

This programme has allowed us to :

- set up a scalable technology platform to keep pace with the growth of deposits
- enhance OPS/Sales operational efficiency by processing more customers (time saved for each file processed), reducing loan allocation lead times, optimising file traceability and monitoring, and automating certain tasks and controls,
- make the customer journey/asset management advice more attractive via digitised portals that attract more customers,
- align with market requirements (for partners and customers).



## Preparing to integrate HSBC France’s retail banking operations and staff into the Group, and the rebirth of the CCF brand

My Money Group remains committed to expanding its footprint in the competitive world of retail banking. The ongoing acquisition of HSBC’s retail banking business in France which began in 2021 is a perfect illustration of this strategy.

This acquisition will give My Money Group an extensive network of around 800 000 customers, 244 physical branches and 3 900 employees, along with nearly €24 billion worth of assets, a €21 billion loan book and €19 billion in deposits.

The programme moved into higher gear in 2021 and 2022 :

- Structuring of the programme with significant investments in internal and external expertise
- Completion of the design phase for all aspects of the programme
- Building up the necessary capacity to operate the business
- Signature of the strategic partnership with Arkéa to access their banking platform.

My Money Group aims to :

- relaunch the CCF brand as a wealth management bank serving its customers
- leverage on the expertise of existing teams and offer innovative solutions to customers
- simplify processes to meet customer needs faster and more effectively.

Over the coming months, the project teams will work intensively to put the finishing touches to the

human, process and technological aspects of the new CCF :

- An intensive test phase to ensure the integrity of data transferred and that all functionalities will be working in time
- Building a new identity for the CCF  
At the same time, we are preparing to welcome our new colleagues and finalising the training plan.

Increasingly, we are focusing on preparations for switchover day and successfully relaunching the bank.



### Acting as responsible corporate citizen for our staff, customers and partners

Sustainability lies at the heart of the My Money Group's ambitions and strategy. Acting as a responsible corporate citizen towards all our staff, customers and partners is therefore a strategic priority for the Group.

Eager to fully integrate social, societal and environmental considerations, to respond to the challenges of the banking sector and to meet the expectations of its stakeholders, My Money Group sought to formalise its sustainability strategy in 2022.

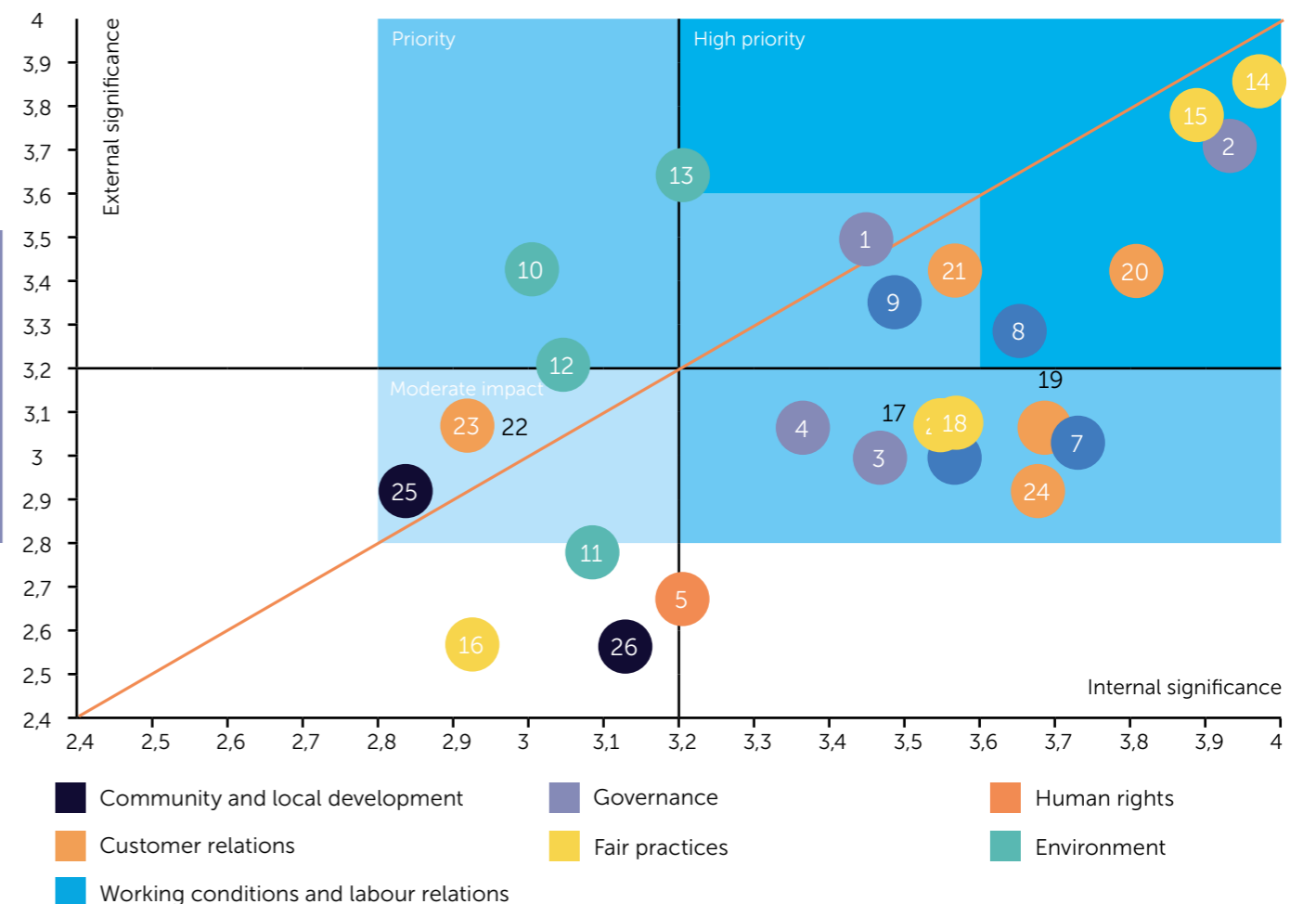
To this end, the Group set up a Sustainability department which has held discussions with its internal and external stakeholders. Using a list of identified issues and risks (applying the ISO 26000 list for Sustainability), each stakeholder consulted contributed to prioritising the issues to be taken into account by My Money Group and to the identification of the major structuring trends for the Group's sector.

My Money Group was thus able to build its materiality matrix and formalise its Sustainability strategy.

The list of issues was drawn up after :

- Benchmarking the challenges of the sector
- Benchmarking emerging global issues
- A documentary review.

Materiality matrix



N	Subject/Issue
<b>Employeur engagé</b>	
1	Integration of CSR
3	Responsible development
6	Employee well-being
7	Health & Safety of employees and visitors
8	Diversity, non-discrimination and inclusion
9	Training and development of human capital
26	Social commitment
<b>Ethical partner</b>	
2	Laws, regulations & reporting
4	Stakeholder Dialogues
5	Responsible purchasing & human rights
14	Business Ethics
15	Cyber security & data privacy
17	Fair competition
18	Loyalty Partners
19	Equal treatment of customers
20	Transparent communication
23	Customer support and training










<b>Climate actor</b>	
10	Climate change
11	Sustainable resource management
<b>Innovative lender</b>	
12	Responsible refinancing
13	Energetic transition
16	Promotion of SR
21	Advice & customer satisfaction
22	Responsible credit & savings
24	Technological innovation and digitalization
25	Economic development in the territories

This materiality matrix made it possible to prioritise the Group's non-financial risks and challenges and to define four strategic pillars, enabling the Group to respond to the priority challenges and risks identified as well as to the UN's Sustainable Development Goals.

My Money Group's objective is at once simple and ambitious: to incorporate the UN's Sustainable Development Goals (SDGs) into all of its business lines and processes, thereby meeting the expectations

of its customers and employees and strengthening its position in the banking market. In 2015, the UN set out its 17 Sustainable Development Goals (SDGs). MMG has incorporated the most relevant of these into its sustainability policy.

**The Group's sustainability strategy is based on four strategic pillars that address our most important priorities :**

	Ambition	Issues at stake	Matrix correspondence	
<b>Acting as a socially responsible business</b> 				
Pillar 1	A committed employer   	Cultivate personal development, empathy and social commitment.	Culture of diversity and inclusion	Diversité, non-discrimination et inclusion
			Self-fulfilment and self-realisation (welfare, health, security)	Staff well-being Health and safety
			Setting priorities for the integrated CSR policy and mobilisation of teams	Integration of CSR Responsible growth
			Social commitment (partnerships and skills-based sponsorship)	Social commitment
Pillar 2	An ethical partner 	Operating in an ethical and fair manner, responsible purchasing.	Cybersecurity and data confidentiality	Cybersecurity and data confidentiality
			Ethical partnerships and fair practices	Business ethics Fair competition Fair practices
			Transparency of internal and external communication (sharing targets and monitoring indicators)	Responsible purchasing
			Transparence de la communication interne et externe (partage des objectifs et suivi des indicateurs)	Laws and regulations Transparent communication
Pillar 3	A climate player  	Measuring and reducing our environmental footprint.	Reducing the carbon footprint of the undertaking	Climate change
			Sustainable use of resources and equipment	Sustainable management of resources
Pillar 4	An innovative lender  	Supporting customers and partners in their environmental transition.	Developing financial offerings and services to support the environmental transition ;	Responsible refinancing Energy transition
			Helping customers to take better control of their finances	Advice and customer satisfaction

« Sensitive and interested in environmental issues for several years, I had the opportunity to follow a Climate Mural workshop within the Group. I found that the causes and issues of climate change were addressed in a very educational and fun way. Being convinced that raising awareness among as many people as possible is essential to meeting the climate challenge, I in turn wanted to be an actor by committing myself as a facilitator of the Climate Mural.»

Aymeric Duval,  
Ambassador My Green Team

Alongside its Sustainability department, My Money Group has three active communities that are involved in the implementation of its strategy :

### My Green Team

Created in May 2022, MY GREEN TEAM brings together a group of ambassadors with a commitment to the environment.

This community reinforces the importance of climate and environmental issues within the Group and its various entities. It promotes energy saving measures, leads and organises Masterclasses on climate and creates cohesion around these topics.

It meets once a month. It has a Teams channel for sharing best practices and current issues. All the Group's news about environmental issues and this community are shared with all our staff through a newsletter called «The My Green Team Gazette».

« I was immediately enthusiastic about the idea of being a CSR ambassador in the Group because I think we have a better chance of raising the awareness of as many people as possible in the company rather than outside (we approximately 80% of our time working).»

Noémie Moestus,  
Ambassador My Green Team

The community's ambassadors include 15 muralists trained to run the Climate Mural ("Fresque du Climat"). Workshops are organised regularly in Paris, Nantes and Réunion. In 2022, 31 staff attended climate mural workshops in Paris, 28 in Nantes and 16 in La Réunion

### Mix My Group

Created in 2021, MIX MY GROUP is an initiative led by women within the Group to promote diversity and inclusion and is open to all employees, women and men alike. The aim of this network is to bring together a community interested by these subjects to discuss current issues, encourage diversity and make MY MONEY GROUP increasingly diverse and inclusive.



The community focuses on four main themes :

- Promoting diversity and inclusion within the Group
- A commitment to disability issues
- Supporting equal opportunities and social diversity
- Encouraging and developing the talents of women

MIX MY GROUP offers the Group's women employees a training programme called «ELLE», on leadership, negotiation, personal branding and the work/life balance.

### My Feel Good

This is a programme launched in 2020 to promote engagement and the quality of working life.

The Group encourages personal development and promotes well-being at work through a variety of initiatives :

- Encouraging physical activities: walking, rowing, solidarity races, triathlon, futsal
- Organisation of My Master Class with external contributors
- Dedicated events throughout the year: Quality of Working Life Week, Mental Health Day, volunteering.

« The training modules offered in My Climate School are really well thought out: they adapt to a wide audience, allow you to see more clearly on a lot of subjects, the videos are very well presented, very fun, with lots of very concrete examples to better understand concepts that are sometimes a little complicated. These videos also help to "tidy up" the abundance of information that surrounds us! »

Eric Tuillier,  
Ambassador My Green Team



# 03 Non-financial risks and challenges

# 1 Pillar 1 Committed employer

The Group has around 950 staff vs. 900 in 2021.

The human element remains at the heart of the Group's concerns and represents a key challenge, particularly in light of the technical nature of its business and the strict regulatory requirements.

By deciding to give the human element a central place in its identity and values, the Group is endeavouring to position itself as an independent and responsible banking industry player that is respectful of its staff, its customers and its partners.

As a committed player in its sector, the Group is developing and disseminating its values both internally and externally.

Guided by the need to provide customers with high-quality support, the Group chooses and trains its staff rigorously to meet these high standards.

The study of the employment risks and challenges faced by entities in the Group consists of three parts :

- a) Attracting and retaining talent
- b) Staff commitment
- c) Diversity and equal opportunities

## a) Attracting and retaining talent

By ensuring its status as an attractive employer in its market, the Group can attract new talent to support the growth of its business. Thanks to an ambitious training policy, the Group supports its staff in the acquisition of new skills. In an industry subject to significant turnover, it is essential to retain existing talented staff and support them throughout their careers.

### Recruitment policy

In 2022, My Money Bank recruited 102 employees on permanent contracts and five on fixed-term contracts (in 2021: 54 on permanent contracts and 10 on fixed-term contracts). The overseas subsidiaries have recruited three employees on permanent contracts and six on fixed-term contracts (in 2021: eight and three respectively), while for Banque des Caraïbes the figures are 40 and three respectively (vs 17 and 10 in 2021). The sharp increase in recruitment compared with previous years is due to the need to prepare for the acquisition of HBCE's retail banking activities.

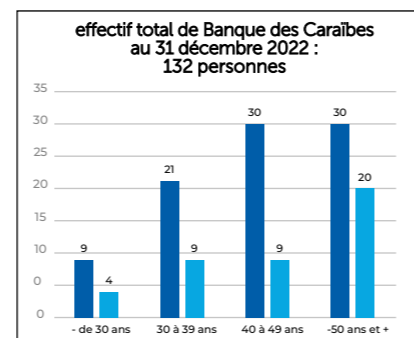
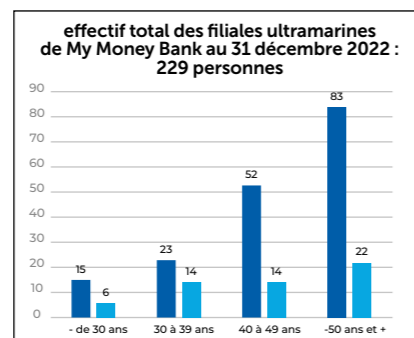
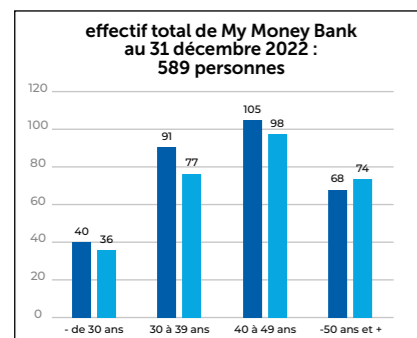
Because of the technical nature of its business and its ambitious growth targets, preserving the diversity and quality of staff profiles is a real employment challenge.

In 2022, the Group continued its "My Best Colleague" coopting policy, with the aim of encouraging staff to activate their networks to recommend talented applicants with the right profiles for the positions to be filled.

### Remuneration policy

As parent company in the Group, Promontoria MMB establishes the remuneration policy applicable to all employees, based on the recommendations of the remuneration committee and the regulatory provisions.

The graphics below give a brief outline of the composition of the Group's staff.



men  
women



**The Group remuneration policy has the following main objectives :**

- ensuring that individual interests are congruent with the economic strategy, long-term interests and values of the Group,
- retaining employees by appropriate remuneration,
- discouraging staff from taking excessive risks, avoiding conflicts of interests,
- for staff whose activities may have a significant influence on the risk exposure of an entity or the Group, defining measures to align methods for the determination and payment of risk-related remuneration,
- remunerating staff conducting control activities based on the specific objectives of these missions.

The annual wage settlement programme and the bonus scheme are validated by the Executive Management. The bonus scheme is submitted to a vote in the remuneration committee and the Board of Directors.

During the mandatory annual salary negotiations, My Money Bank and its subsidiaries allocated a budget of 1.6% of the payroll (vs. 1% in 2021) reserved for merit raises and promotions. Almost 86% of employees received a salary rise in 2022 (vs. 92% in 2021). The budget was 0.80% for Banque des Caraïbes (vs. 1.3% in 2021).

My Money Bank has confirmed its commitment to gender equality by signing successive company agreements.

For the 2022 reporting period, MMB's gender equality index stands at 85 points, Somafi-Soguafi's at 91 points, and Sorefi and Banque des Caraïbes at 89 points (in 2021: 90/100 points for My Money Bank, 89 for Somafi-Soguafi, 93 for Sorefi and 84 for Banque des Caraïbes in 2021).

### Retaining talent

Convinced that the outlook for career progression within its various entities contributes to the retention of talent, My Money Group shares its results, structuring projects and strategy with its staff in a transparent manner.

In October 2022, the Group Leaders took part in a three-day convention at La Baule during which conferences and debates took place, in particular on results and strategy. These working sessions were punctuated by convivial interludes, informal exchanges and team building.

The Comex regularly keeps staff up to date about the Group's activities via video communications and round tables. The Director of Human Resources and the Chief Executive have launched a new discussion format, «My Money Talk», to discuss topical issues and answer questions from employees.

The Group acknowledges the exceptional contributions of some employees by bestowing awards. Almost 218 awards were distributed in 2022.

Since 2019, the Group has applied an internal classification system enabling all staff to identify the positioning of their roles in the organisation, facilitating intra-Group mobility and highlighting the prospects for career development. The turnover rate was 14.3% in 2022.

### Training and support

For several years, the Group has taken a strategic approach to the identification of issues involved in staff development and the preparation of an appropriate training policy.

In order to develop the skills appropriate to the new jobs, new technologies and organisational change, in 2022 the Group continued its policy of prioritising day-to-day training to accelerate cultural transformation.

In 2022 My Money Group introduced «My Climate School» to all its staff, an online training course to help them understand the impact of climate change, raise awareness on sustainable development and take action for the climate.

Employees also have the chance to take part in a climate mural workshop (Fresque du Climat), which is led by colleagues trained in the methodology and organisation of such workshops. The climate mural is a collaborative and enjoyable approach, a three-hour session leading to a global vision of the climate and creating a team spirit.

Since 2018, with the aim of reflecting the new strategic issues facing the banking industry, the Group has continued with its learning enterprise approach, with training priorities focusing on the skills and expertise to encourage adaptation to the job and encourage staff career development.

In 2022, My Money Bank dedicated a budget of over €515 000 to training (up from €460 000 in 2021), with a skills development plan in line with the Company's strategic priorities.

Across the Group, this represents more than 14 000 training hours delivered (compared with 16 000 hours in 2021).



## b) Staff commitment

Although the Group belongs to an industry tending increasingly towards digitation, its image and expertise mainly depend on the commitment of its staff, in particular through the following :

### Dissemination and ownership of Group values

All new recruits receive a copy of the code of conduct entitled *Ce que nous sommes* ('What we are'), which lists and explains these values, illustrating them with concrete examples.

The values are framed and displayed on all the sites so that they are part of the everyday environment for staff.

### Performance reviews

The Group uses the TalentSoft tool for setting targets and for annual and mid-year staff appraisals. It enables both staff and managers to keep a running record, throughout the year, of an employee's outputs, and to record progress towards the achievement of targets. The appraisal is discussed during the annual interview.

Since 2020, TalentSoft has also been used to support professional appraisals.

### Social dialogue and collective agreements

My Money Bank and Banque des Caraïbes staff are covered by the collective agreement for the banking sector (IDCC 2120) and by agreements negotiated within each company.

My Money Bank subsidiaries are covered by the finance company collective agreement (IDCC 478).

The Group ascribes great importance to the quality of social dialogue based on transparency, and this is reflected in part in regular constructive meetings with staff representative bodies and trade union officials.

In 2022, My Money Bank and its subsidiaries conducted negotiations with the trade unions which resulted in the signing of enterprise agreements, in particular on the mandatory annual negotiations (NAO), the exceptional purchasing power bonus, profit-sharing, teleworking, working hours and the time savings account.

### Health and safety

#### Health

Prevention of risks to staff health and welfare at work.

The single document assessing professional risks and the annual programme for preventing professional risks and improving working conditions are reviewed at each meeting of My Money Bank's health, safety and working conditions committee (SSCT) in order to ensure that any measures identified are taken promptly and to react fast if necessary.

The Group took the opportunity of Quality of Life at Work week to share valuable advice on workstation ergonomics and organisation for a better work/life balance.

#### Psychological support and counselling

Since 2013, My Money Bank has offered its employees psychological support and counselling provided by the Eléas consultancy, specialists in the management and prevention of psychosocial risks and the quality of life at work. This measure was then extended to all the Group's entities.

#### Safety

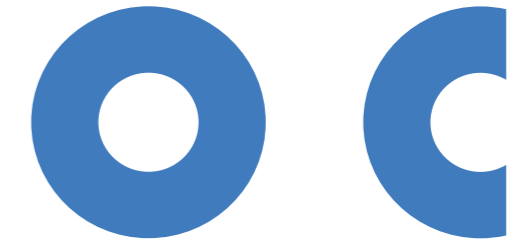
The Group's entities have key contacts organised around the crisis management officers present on each site.

For example :

- The Tour Europlaza, in compliance with the high-rise building regulation (Immeuble de grande hauteur, IGH) has a security and monitoring post that is active 24/7. In permanent operation, it ensures security in the building thanks to fire detection and fire-fighting equipment. The safety officer organises an annual evacuation exercise.
- The two buildings on the Nantes site are subject to the regulations

on buildings accessed by the public (Établissement recevant du public, ERP). Each has fire detection equipment linked to an alarm control unit supervised by a monitoring service.

The annual regulatory checks (electricity, detection, fire, extinguishers, air extraction, etc.) are recorded in the security record held on each site.



### Measures to support general staff welfare

The existing collective agreements, particularly those concerning professional equality, the quality of life at work and working conditions contribute overall to the general welfare of staff.

#### Premises

The measures in the risk prevention plan and the maintenance of the working premises contribute to maintaining pleasant working conditions.

The Paris and Nantes premises are regularly maintained.

After some of the Nantes teams moved into a new building, completely renovated with spaces designed to encourage discussion, collaboration and comfort, the second building in Nantes has been renovated in its turn.

The overseas entities also have recent premises providing a modern, adapted working environment.

## Opinion survey

Since October 2019, the Group has used the “SuperMood» tool to conduct regular surveys of employee engagement and their reasons for satisfaction or dissatisfaction.

The most recent survey, launched in November 2022, had a participation rate of 54%, 8 points higher than in 2021. This increase can be explained in part by the involvement of many employees who attended a conference in November given by SuperMood’s founder to remind them of the purpose and value of this initiative.

The degree of workplace autonomy and the quality of managerial support within the Group were both widely praised. Staff continue to call for communication about the forthcoming changes.

Each entity is working to build an action plan to reflect the results.

The Group also endeavours to evaluate the feelings of its employees through the ENPS (Employee Net Promoter Score), which, as in 2021, stands at 21.

SuperMood also allows everyone to send a weekly «SuperLike» to the colleague of their choice to thank or congratulate them. In 2022 more than 4215 “SuperLikes” were sent.

## Physical and sporting activities

Staff working at the Tour Europlaza can sign up for the gym located on site.

A number of Paris-based staff took part in the Children Without Cancer race organised by the Imagine for Margo Association in May and September.

In October, My Money Group was involved in supporting Pink October by encouraging all its employees to join in a solidarity run. For every kilometre run during the month of October, My Money Group made a donation to the Institut Curie. More than 4 000 km were covered during the course of the month.

Odysséa funds breast cancer research by organising races throughout France. During this event My Money Group paid for the race numbers of employees who wished to take part to promote awareness of breast cancer screening and to raise funds for research while encouraging physical and sporting activities. In 2022, 23 staff took part in the Odysséa race organised in Nantes and in La Réunion.



## c) Diversity and equal opportunities

### Measures promoting professional equality

The Group’s actions focus on the following five main areas.

**Recruitment** : recruitment is solely based on objective criteria: skills, professional experience, training and qualifications, with a guarantee of strictly identical recruitment conditions for women and men with equivalent profiles for a given position.

**Ongoing professional training** : the Group guarantees equality of access to all employees, women and men, to ongoing professional training. The same goes for **career development**.

**Remuneration** : the Group continues to work to reduce the pay gap between women and men, as the gender equality index shows.

**Parenthood** : with special monitoring of staff on maternity, adoption or parental leave by HR officers and managers.

### Integration and retention of people with disabilities

The Group is continuing its policy of retaining and supporting those staff members who are recognised as disabled workers and of helping those who wish to obtain such recognition. In 2022 it distributed a disability guide full of practical information.

In 2022, My Money Group had 23 staff members benefiting from an employment obligation to for disabled workers, 16 at My Money Bank, 6 at Somafi Soguafi and 1 at Banque des Caraïbes, compared with 17 such employees in 2021.



## 2

### Pillar 2

## Ethical partner

In the modern economy, the role of banks as institutions and trusted partners has continued to gain salience. The banking industry is also faced with a constant strengthening of the law governing its activities in terms of AML/CFT, customer protection and the proper management of personal data.

As a regulated player, the Group is committed to conducting all its activities in a legal, ethical and compliant manner, reflecting its values. It also pays particular attention to consumer protection.

A responsible and committed player, the Group has established a code of conduct that offers all its staff an ethical framework to help them steer their actions and take the right decisions. This is handed out to all staff and commercial partners. The values and undertakings it contains provide the basis for all relationships.

This code of conduct is also sent to and signed by the Group's suppliers before they enter into any business relationship.

It forms the basis for all the operational procedures and policies that govern the Company's day-to-day activities. These internal rules are accessible to all staff members on the Group intranet or on request from managers.

The Group is also engaged in the digitisation of all its processes. To this end, it offers its customers opportunities for discussion and management that meet their expectations of modernisation and technological fluidity. These changes are tailored to the needs and expectations of customers who now wish for a faster and more personalised banking relationship.

By adapting and reinventing its tools, our Group is taking a modern, proactive approach, firmly focused on the future.

## a) The responsible distribution of products

### COMPLIANCE WITH EXISTING AND FUTURE REGULATION

Given its regulated activities, My Money Group must constantly adapt to and comply with the changes to the regulations applying to the products it distributes. As these changes are ongoing in nature, a legal monitoring system has been installed in order to integrate or anticipate any regulatory changes.

My Money Group is currently active in mainland France and in the overseas departments (Réunion, Martinique, Guadeloupe and French Guyana). Its activities are therefore likely to be impacted not only by regulatory changes or national political decisions but also by local decisions taken within the jurisdiction of the overseas departments.

The Group has established relationships of trust with the authorities locally as a genuine partner of economic development in the overseas departments.

### MEASURES TO REDUCE THE COMPLIANCE RISK

#### Governance

My Money Group and its regulated subsidiaries are under the supervision of the ACPR (Autorité de contrôle prudentiel et de résolution). For its investment services activities, the Banque des Caraïbes is also regulated by the AMF (Autorité des Marchés Financiers).

My Money Group has appointed a compliance director and compliance officers in all its subsidiaries, responsible for identifying, preventing and measuring compliance risks.

since the end of 2022, the compliance director reports to the newly appointed Secretary General of My Money Group. This reporting line guarantees the necessary independence and resources for his mission. His role includes defining and applying the procedures within his remit, and contributing to the dissemination of a compliance culture within the Group. He is a member of the Executive Committee, with permanent direct access to the directors, with whom he can share any subject.

He fulfils a general advisory role among staff. Compliance failings observed are notified on a quarterly basis to the compliance and risk committees and to the Board of Directors of each legal entity.

#### Risk mapping and control plan

The annual compliance plans and the annual control plan are established on the basis of risk mapping, and these risks include compliance risks. Given the activities of the Group, the main risks concern the regulatory provisions for the prevention of money laundering and terrorism financing, the prevention of corruption, customer protection and the protection of personal data.

These inherent risks are mitigated by control measures that reduce risks to an acceptable residual level.

The risk control measures rely on existing procedures, compliance tools and the internal control system. They are strengthened through training (mentioned below in section 4. Training) which enables all staff to recognise and prevent the risks associated with the activities they carry out.

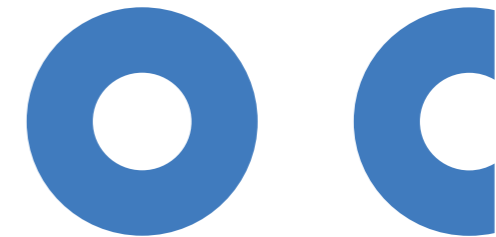
The compliance risk, like the other risks to which the Group is exposed, is assessed every quarter on the basis of indicators that are set and validated annually by the Board of Directors. This is the Risk Appetite Statement. Continuous monitoring of these indicators enables My Money Group to meet its risk exposure targets. The risk culture is also instilled by the human resources department, which is involved in disseminating the entity's values to its employees and encouraging them to embrace them. It clarifies the behaviour that is expected. Furthermore, staff appraisals are not only about performance but also about character and whether behaviour is in line with our values.

The performance appraisal process encourages regular exchanges between employees and their managers on the achievement of targets and how to reach them.

#### Regulatory monitoring

The legal and regulatory monitoring system is able to identify legal or regulatory changes that are poten-

tially applicable to the Group's activities and to establish appropriate action plans. This system is overseen by the regulatory monitoring committee, which ensures that any issues identified are effectively analysed by the departments concerned in order to identify the regulatory impacts on the Group's activities or the necessary changes to the rules governing them.



#### Training

The regularly updated core curriculum covers the regulatory requirements applicable to banking and financial activities. In a preventive approach, its purpose is to maintain and update employees' knowledge of compliance risks (personal data protection, AML/CFT, anti-corruption, conflicts of interest, cybersecurity, etc.).

In addition, specific training courses aim to strengthen the knowledge of the most exposed positions, most often commercial or control roles. 94% of staff completed these courses in 2022 (compared with 91% in 2021) All employees are scheduled to complete this training in the first quarter of 2023.



Finally, some training courses address the obligations arising from the products marketed, the maintenance of certain functions or the need for annual knowledge updates :

- IDD (Insurance Distribution Directive)
- MCD (Mortgage Credit Directive)

All of the Group's managers and executive directors also receive the training essential to the exercise of their responsibilities, obligations and risk perceptions (AML/CFT, GDPR, banking regulations and IFRS prudential standards, conflicts of interest, the fight against corruption, environmental, social and governance criteria and the Basel IV regulation). This training changes from year to year in line with identified needs.

Particular attention is also paid to compliance department staff who take part in market works services or following specialised regulatory training courses, in some cases leading to professional qualifications. As part of their ongoing training, they contribute to the regulatory monitoring of the entity and conduct impact analyses that are shared with all members of the board.

### Internal control system

The My Money Group internal control system is established in accordance with the order of 3 November 2014 as amended on the internal control of businesses in the banking sector. It guarantees the independence of controllers and operates at three levels (ongoing first and second level controls, and periodic controls). These controls cover all the Group's activities. First level controls are carried out automatically or by managers or dedicated controllers in the various departments. Second level controls are carried out in the risks, compliance, human resources and IT departments. Periodic controls on the entire system are carried out by the audit department.

The annual control plans are established on the basis of risk mapping. Depending on the risk identified, they provide for the definition of the controls, their frequency and sampling. They are validated by the permanent control committee and included in the Risk Control Self-Assessment (RCSA) presented to the executive risk committee. Control results and corrective measures are followed up and referred to the permanent control committee. The RCSA and

the associated control plans are reviewed annually to ensure proper cover of all the risks to which the Group's activities are exposed.



### Application of ethical rules and rules of professional conduct to product distribution

The Group has a zero-tolerance policy towards unethical conduct and undertakes to ensure that its employees, partners or third parties share this approach. These rules and undertakings are set out in particular in the code of conduct.

The Group supervises the distribution of its products through a set of policies and procedures designed to prevent compliance risks, in particular the risk of money laundering and terrorist financing (a), corruption (b), conflicts of interests and the risks of poor commercial practices (c) and the fight against tax evasion (d).

#### a) The fight against money laundering and the financing of terrorism

My Money Group is subject to the rules on the fight against money laundering and the financing of terrorism (AML/CFT) and to respect the restrictive financial or commercial measures imposed by means of economic penalties as required by French regulations for banking institutions or Payment Service Providers (PSP).

The system adopted aims to reduce the risk of legal or regulatory penalties, financial loss or reputational damage. It therefore protects our staff and our customers in a relationship of trust while complying fully with the regulatory obligations. It is based on a risk approach as defined by the regulations.

This approach determines a level of risk for each type of customer and the due diligence corresponding to this level in terms of customer knowledge and transaction monitoring. The analysis of the consistency of the client's risk profile, the nature of the relationship and the transactions carried out may lead My Money Group to report to Tracfin in situations where a suspicion of money laundering remains after analysis by My Money Group.

#### b) The fight against corruption

The Group has adopted procedures to fight corruption in the conduct of its business, including the application of strict rules concerning benefits, gifts, and sponsorship. These procedures also apply to the selection and monitoring of its intermediaries and suppliers and to accounting controls.

In addition, all staff may raise questions or report any problems that they may witness, in the first instance to their line manager or to a specialised department (human resources department, legal department, compliance department, etc.).

Similarly, staff may report, anonymously or otherwise, any behaviour or situation that potentially violates the code of conduct or the laws by activating the independent internal warning system.

This system, accessible to everyone in all the Group's premises, enables staff to report problems concerning the matters and risks governed by the law 2016-1691 on transparency, the fight against corruption and the modernisation of economic life ("Sapin II"). It can also be used to report any behaviour that infringes the Group's ethical rules.

### c) Conflicts of interest and the risks of poor commercial practices

Customer satisfaction and the primacy of customers' interests are the two fundamental principles governing the Group's commercial activities.

Staff in contact with customers must prevent any conflict between their customers' and their own personal interests. When delivering advice to customers, they must identify their needs and be certain that the product recommended meets the needs expressed.

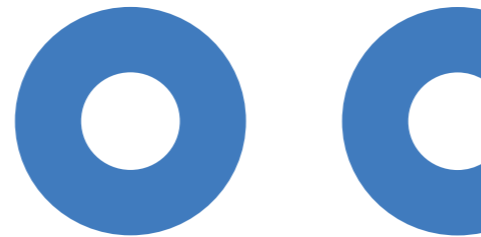
For the purposes of its finance business, My Money Group verifies the customer's debt capacity and offers appropriate products. It refuses to grant loans to customers identified as financially fragile, or where the loan would put them in such a position.

In addition, the subsidiary Banque des Caraïbes complies with the regulatory requirements for the investment services it offers. For this reason, it implements measures to reduce the risk of conflicts of interest, based in particular on the duties of market integrity, fairness among investors and investor protection.

Potential or actual conflicts are centrally handled within the compliance department. This system is based on employee

declarations of interests that could conflict with those of the business or its customers. This declaration is made routinely at the time of recruitment. Employees are also urged to report any conflicts they may identify in the course of their work.

This system is accompanied by dedicated training that is part of the regulatory training plan. The Group also protects itself from the risks posed by poor commercial practices by ensuring the quality of its distribution network.



### d) The fight against tax evasion

The Group operates in France and complies with the tax rules applicable to its activities under national laws.

In its relations with the tax authorities, the Group is committed to respecting tax procedures and maintaining excellent relationships. In their customer relationships, Group entities ensure that their customers are informed of the tax obligations relating to transactions with the Group and that they comply with any reporting obligations that may apply to them as account holders or in any other capacity.

The Group does not practice, encourage or promote tax evasion or participate in transactions that may result in an undue tax advantage.

The Group tax department is responsible for My Money Group's tax compliance, including tax risk management, and for protecting the Group's reputation in tax matters. It is required to validate tax treatment where it may be an important aspect for products, operations or business decisions. In addition, specified control procedures are in place to validate the tax returns filed by the Group.

### Consumer protection

Within the Group, customer protection measures rely on rules to guarantee service quality and the primacy of its customers' interests.

The main oversight rules relate to :

- Advertising and communication aimed at customers: The Group controls all commercial documents and other media intended for its customers in order to ensure that the information is clear, accurate and not misleading.

- Staff training: The Group ensures that advisors maintain their knowledge of the products distributed by the Group, enabling them to inform the clients in their decision taking.

- Pricing policy: The Group has established procedures governing the applicable pricing policies and ensuring compliance with usury rates

My Money Group also ensures that the general banking conditions and distributor remuneration rules comply with regulatory requirements.

Selection and monitoring of business relationships with intermediaries :

- Only intermediaries meeting professional, regulatory and reputational requirements are authorised to distribute My Money Group products. They are assessed frequently.
- Monitoring sales practices: the Group monitors the proper marketing of its products through post-sale customer contacts. The main aim of these post-sale calls is to ensure the quality of the advice given and to check that the mandatory information has in fact been provided.

- Centralised claims processing is used to identify any poor commercial practices or malfunctions in terms of consumer protection and to take corrective measures.
- The policy of banking inclusion and of prevention of over-indebtedness contributes to the early identification of customers in a financially fragile state and enables the most appropriate solution to be suggested where this is possible. Staff have been given training in order to guarantee the best support for customers.
- Protecting customer assets: as a banking institution, the Group guarantees that its customers' assets are protected in line with its obligations. The entities concerned are members of the Fonds de Garantie des Dépôts et de Résolution (FGDR).

## Identification of shortcomings and risk reduction procedure

The body of procedures adopted by the Group relies on a system of referring malfunctions to the staff member and their immediate supervisor in the first instance. Such supervisors act as advisors to their teams.

The compliance, permanent control and internal audit departments identify, centralise and report failures in procedures or their application to the risk committee. These key departments also have a direct link to the Chief Executive and the Board of Directors.

These departments issue recommendations in order to remedy inadequacies where these are observed and monitor the implementation of corrective measures. Furthermore, the Group's different entities can access an independent internal channel for reporting alerts, which allows both employees and business associates to report a malfunction, anonymously or otherwise.

Compliance failures are the subject of quarterly monitoring. These are handled centrally by compliance managers in subsidiaries and reported to the Group compliance director, who consolidates and monitors them until resolved.

Taken together, these measures contribute to risk reduction through the continuously adapted mapping of the risks to which the Group is exposed, drafting the control plan and implementing corrective measures.





## b) Data protection and cybersecurity

In a context of ongoing digitisation in the banking market and new models of consumption by customers, the Group has adopted a standardised and consolidated approach to the protection of personal data (1), while controlling its IT risks (2).

### Protection of personal data

Data protection and security are essential issues for My Money Group, and a consistent, consolidated approach is taken, not least to ensure compliance with the General Data Protection Regulation (GDPR) or cybersecurity measures. 2022 saw the further improvement of its personal data protection system :

- Data protection referents have been appointed by each department head to strengthen system governance and ensure the link between the DPO and operational teams. They are also responsible for ensuring that the personal data processing operations within their remit are up to date.
- New personal data protection controls have been defined to ensure compliance with the rules contained in the Group's GDPR documentation.
- My Money Group also ensures that all its employees are trained in the key principles of data protection through an e-learning training

module or through general or targeted awareness-raising actions (e.g. management of free comment zones, identification and reporting of data breaches).

- Finally, the DPO monitors key personal data protection indicators and any problem areas, and reports to management via internal committees and in their annual report. They take part in consultative meetings held by professional associations in order to share best practices with their peers.



### IT performance

The increasing complexity of new technology, the development of cloud computing and the growing cybersecurity risk are reflected, in general and worldwide, in a significant rise in incidents affecting information systems (including cybersecurity incidents).

The banking sector, which is undergoing profound digital changes, is directly impacted by the complexity and the particular nature of cybersecurity :

- it is difficult to determine the precise consequences of a potential breach of security, as cyberattacks are ever more sophisticated and difficult to eradicate ;
- the impact can be significant, and can directly impact business continuity, in particular by corrupting backup data ;
- the multiplicity of players involved, such as suppliers or service providers, increases the cybersecurity risks associated with outsourcing. This is because a subcontractor whose security measures are not adequate can represent a way into an institution's information system.

These aspects of cyber risks are forcing all the Group's entities to adapt their performance in terms of IT security.

To respond to these concerns, the Group, in line with the recommendations of the regulators, is gradually strengthening its risk mitigation

measures. To control the IT risk, the Group follows the practices described in ISO 27001 when implementing its information security management system (ISMS). As IT risk control is not the responsibility of IT teams alone, the institution has opted to include it in a generalised approach to the control and management of risks under the leadership of the risk director (the "Group Chief Risk Officer" referred to in the banking regulations).

Through this organisation, which is required to serve all the Group's entities, the managing bodies of the Group are directly involved both in bringing IT strategy into line with the risk appetite and in implementing and following up risk mitigation measures.

The agile and digital transformation of the Group involves a parallel strengthening of mechanisms for managing existing and emerging risks of this type. Digitisation has led the Group to adopt a range of cloud computing solutions, including software as a service (SaaS) and infrastructure as a service (IaaS), that enable it to significantly reduce costs and delays in developing new applications.

Aware of the impacts of the use of cloud computer technologies and the risks that they can entail, particularly for banking activity, the Group is taking great care to respond to the recommendations and expectations of its regulators - the Autorité de Contrôle Prudentiel et de Résolution, the European Banking Authority and the National Commission on Information Technology and Liberties - by implementing secure, controlled solutions.

The risk mapping that was begun during 2018 has since been periodically and systematically reviewed in order to include the risks associated with the new structural and operational arrangements for Group IT. This provides an accurate picture of the areas requiring attention from staff in charge of IT assets in the course of their day-to-day work.

In terms of IT security, the Group is adopting an approach of constant improvement, not least in the Security Operation Center (SOC) and through the introduction of a Bastion-type solution to secure high-privilege access. The scope of these solutions is changing as the Group's information system evolves. In addition, security teams support staff in charge of IT assets by regularly raising awareness of the security issues to be taken into account within projects.

In order to ensure a satisfactory level of security, the products developed within the Group are subject to particular attention through code reviews, technical security audits and raising awareness of secure development among product teams



## Risk reduction policy

### • Regular monitoring of subcontractors

The Group sourcing team provides monthly monitoring of all subcontractors in order to guarantee the rigour, service quality and degree of expertise they deliver. It is imperative for the Group to maintain a high level of quality and security in its services and products, particularly where outsourcing is used. Furthermore, all new relationships with a provider are subject to a security risk assessment.

### • Controls on security measures

The development of internal practices has led the Group to define and establish new controls on its ISMS in order to ensure the proper management of risks.

### • Specialised training provided to staff

The adoption of AGILE practices within the Group is accompanied by measures to raise teams' awareness of cybersecurity risks.

As part of its digital transformation programme, in 2022 My Money Bank continued the work undertaken to digitise operational management procedures in the business unit dedicated to financing for real estate professionals.

For this activity, it has introduced a solution for proactive communication with customers to alert them to the dates and amounts of their repayments. An automated payment solution for construction loans has also been put in place, allowing the teams to concentrate on higher value-added tasks and to offer customers a better service.

My Money Group also carried out a complete overhaul of its banking product management tools for its DOM entities in 2022. It has also modernised its management tools for savings products.

The team is continuing its digitisation efforts, improving its services to better meet market and customer expectations.

# 3

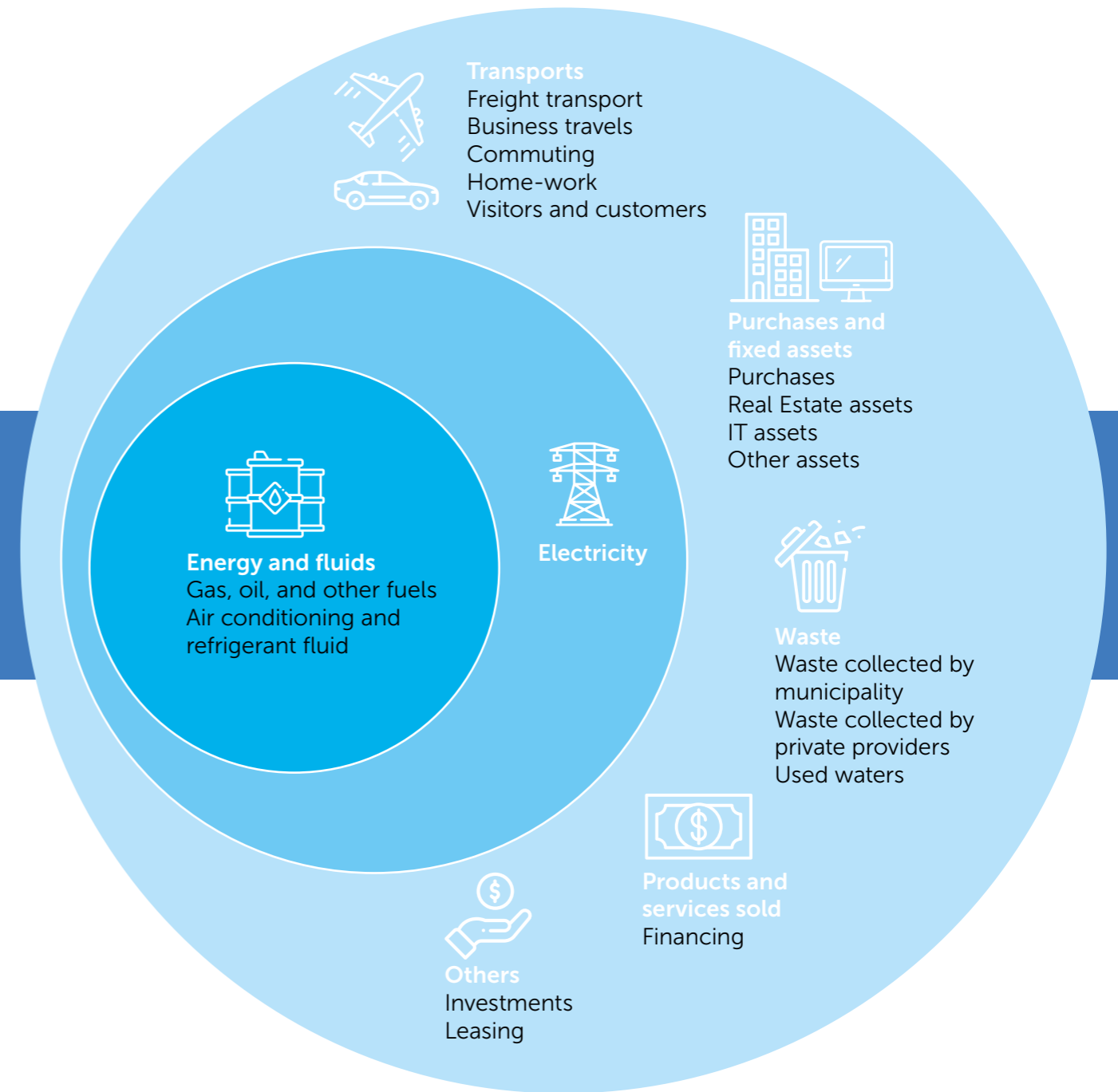
## Pillar 3 Climate player

Although its entities' business activities neither cause pollution nor are classified as at risk, the Group has opted to pursue a socially responsible environmental policy. Aware of the role of banking and financial institutions in climate change, the Group has decided to take part, at its level, in the general fight against climate disruption. Whether through its staff, its customers or its financial products, the Group strives to encourage environmentally responsible behaviour.

As part of the sustainability strategy and the climate role which the Group wishes to embody, My Money Group decided to measure the bank's carbon footprint both as a corporate entity and as a credit institution.

In the second half of 2022, My Money Group measured all the greenhouse gases emitted directly and indirectly during 2021. The Group's carbon footprint was therefore calculated on the entire 3 Scopes, including measuring the impact of emissions stemming from financing and investments.

This review is a starting point allowing My Money Group to better understand and address its environmental impact, particularly through its financing and investments. This is the first step towards defining a carbon impact reduction strategy and action plan. This exercise will now be carried out on an annual basis.



- Direct emissions from Energy
- Indirect emissions from Energy
- Other indirect emissions

In strictly operational terms, and with an eye to offsetting, My Money Group determined the emissions factors of a corporate seminar held in mainland France, including the travel of employees to the seminar venue, using an ADEME methodology.

It was decided to implement an offsetting process by funding a tree planting project organised by Treeseve (formerly Trees Everywhere).

This exercise will be repeated for future seminars.

The Group has, for several years, taken measures designed to include the environmental aspect of projects, financing, equipment or internal initiatives.

For example, the oversea entities Sorefi and Somafi-Soguafi have positioned themselves locally as responsible players, with :

- maintaining hybrid and electric vehicles on the list of company vehicles for eligible staff with an upgraded budget ;
- the implementation in the second half of 2020 of an electronic signature system for credit agreements for individuals and personal loans followed by the deployment of this offer to professionals in 2021. This, in addition to generating productivity gains (operational and control), leading to a significant reduction in paper and ink consumption, both for the Company and for its customers ;
- the use of online application forms and the uploading of documents to the customer area of websites, reducing customer travel ;
- the distribution, through the social network Facebook pages set up for Sorefi and Somafi-Soguafi, of content promoting good citizenship (energy saving, recycling, tips for avoiding waste, etc.).
- the internal recommendation of the use of virtuous search engines (Lilo).

Since 2020 My Money Bank has offered a "full digital" track to its customers, with :

- Access to a personal area for secure loan applications, the management of products held at the bank, communication and document access.
- The option of an electronic signature for mortgage loan consolidation offers (the first spe-

cialised bank to offer this service in France), with a take-up rate of over 70% since its launch, resulting in a productivity gain for operational teams and a considerably shorter financing timeline for customers. The intention is to extend this service to its mortgage-free loan consolidation offer in 2022.

More strategically, the Group is closely following current movements in the "green finance" segment which is developing in Europe.

By establishing an issuer of covered bonds, MMB SCF in 2018, the Group set up an entity enabling it to refinance directly on the financial markets. The Group's managing bodies ultimately, and with respect to the composition of its collateral, plan the incorporation of environmental issues in the structuring of

its bond issues placed with institutional investors.

In order to promote an energy-saving approach, My Money Group signed the Ecowatt charter in December 2022.

**To assess the environmental risks and challenges to the activities of My Money Group, the following section of this report addresses:**

- a) Failure to adapt the business to environmental challenges**
- b) The physical risks of extreme climate events**

## a) Failure to adapt the business to environmental challenges

As a corporate citizen, the Group is particularly attentive to climate disruption and the issues that accompany it. Internally, the Group has for several years conducted a responsible resources management policy (paper, electricity, etc.) and fully integrates this aspect into cost control.

### Energy performance policy for its premises

In deciding to install its registered offices, and those of its main subsidiaries, in the Tour Europlaza at Paris La Défense, the Group has taken care to choose premises that meet high energy performance standards, since these premises have received High Quality Environmental (HQE) certification. NF HQE certification for

new or renovated service buildings (NF HQE Bâtiments Tertiaires - Neuf ou Rénovation) makes it possible to enhance the performance of buildings, but also to reduce their consumption and environmental impact and to improve the health and comfort of their users.

Internally, in the cafeterias in the Paris building, management have raised staff awareness of the Tour's undertaking to sort waste. Employees are thus urged to use the bins - as appropriate to each waste type - provided in the offices, cafeterias and other shared spaces. In addition, Tour Europlaza employs the company Paprec to process the waste from the common areas as well as from its tenants. All the waste collected is sorted and then sent to a recycling centre.

In terms of the thresholds established by the decree 2013-1121 of 4 December 2013, namely (i) a workforce exceeding 250 persons and (ii) revenue of more than €50 million or a total balance sheet not exceeding €43 million, My Money Bank, a member of the Group, is obliged to conduct an energy audit of its activity every four years. This obligation is enshrined in article 40 of law 2013-619 of 19 July 2013 "containing various measures adapting law to European Union law in the field of development".

Accordingly, the company SINTEO conducted NF EN 16247-1 and 2 energy audits in Paris (Tour Europlaza) on 19 January 2016 and in Nantes (Alaska and Idaho buildings) on 23 February 2016. The Group is currently working with a service provider on the decree governing tertiary sector buildings. A new energy audit is planned for 2023 and the service provider will be able to assist the Group with energy reduction commitments that will be approved at the end of the audit.

Furthermore, in day-to-day operations the Group ensures the sustainable and rational use of resources by all its staff.

**Energy consumption/Measures taken to improve energy efficiency and the use of renewables**

**Electricity consumption  
CO2 emissions due to electricity consumption**

Lighting operating hours are restricted to certain time periods and to days when staff are present. This measure has seen electricity consumption fall, and consequently the environmental impact also. In premises in mainland France, lighting and air conditioning systems are switched off every evening

at 22.00 hours and can only be switched on manually or through a motion detection system.



This approach is accompanied by a number of initiatives, including :

- the replacement of used light bulbs with low-power LEDs ;
- the renovation of air conditioning circuits in 2019 in agreement with the manager of the premises at La Défense. This work has replaced the lost-water air conditioning with a new and more efficient closed circuit system with better energy performance, re-using the chilled water provided by a specialist company ;
- the replacement of a large proportion of computer screens by screens with low consumption.

During 2022, electricity consumption for all the Group's entities totalled 1 552 465 kWh, down from 1 696 154 kWh in 2021, equivalent in terms of greenhouse gas emissions to 651.64 tonnes of CO2 in 2022 and 893 tonnes in 2021.

**Consumption of fossil fuels  
CO2 emissions due to business travel per employee**

The Group applies various measures to promote the use of the most responsible transport modes for staff journeys.

To this end, staff eligible for a company car are offered the choice of electric, hybrid, petrol or diesel



vehicles, insofar as their choice remains compatible with their professional activity and their need for autonomy.

Fuel consumption for all the Group's entities in 2022 was equivalent to greenhouse gas emissions of 320.32 tonnes CO2, compared with 261.54 tonnes CO2 in 2021. This increase can be explained by the fact that 2021 saw successive lockdowns leading to a reduction in travel in these departments.

Greenhouse gas emissions from other ground travel totalled 79.67 tonnes of CO2 while air travel accounted for 445.08 tonnes of CO2 for all Group employees in 2022.

Parking spaces fitted with charging stations have been created for electrical vehicles at the Paris La Défense site, and bicycle parking has been provided at the Nantes site. A study is being undertaken to establish electric vehicle charging stations at the Nantes site, which could also benefit My Money Bank staff using a personal electric vehicle.

The growth of distance working for staff also contributes to limiting the impact of business travel on the environment.

The installation of five video-conference rooms in the premises at Paris La Défense and Nantes in 2019 facilitates communication between the two sites and helps to reduce staff travel.

**A policy of responsible consumption**

**Paper**

Given the nature of the Group's business activities, the consumption of raw materials relates almost exclusively to paper. Since 2017, the Group has undertaken measures to reduce paper consumption, introducing digitised solutions for information exchanges, the electronic signature for contracts and a pass-protected printer pool programmed to delete printing works not recovered after 48 hours.

The introduction of a "universal office" to handle customer and prospects' documents and the digital

signature solutions established in 2020 as part of the Group's digitisation drive have contributed to the reduction of paper consumption. The remote working encouraged by the Group in 2020 and 2021 due to the Covid-19 crisis has also made a substantial contribution.

In the same vein, the launch of digital signature projects in mainland France and the overseas departments aims to avoid the need for printing.

The paper tonnage for 2022 stood at 10.30 tonnes across the Group as a whole.

#### Computer equipment

My Money Group encourages a responsible approach to the purchase and management of IT equipment. For example, equipping a large proportion of staff computers with low consumption screens and recycling used ink cartridges.

#### Fighting food waste

In agreement with all the tenants, including My Money Bank, the company restaurant at Paris-la-Défense has introduced a vegetarian meal on Thursdays in order to reduce meat consumption.

It has also reduced the portions served to diners in an effort to reduce food waste.

My Money Group is committed to a number of eco-actions on the part of its employees. These are regularly brought to the attention of employees and are displayed in the Group's premises. This is essentially a matter of applying sound practices in everyday life.



## b) The physical risks of extreme climate events

The Group's financing subsidiaries in Réunion, the Antilles and Guyana operate in geographic areas that regularly experience violent climate events which are occurring with increasing frequency.

Whether to protect staff, equipment and buildings or in the interests of customers, the Group has adapted measures in place to support its overseas subsidiaries during such events.

### Management of risks to staff and Group assets

As a responsible employer, the Group strives to ensure the physical and psychological safety of its staff.

Hence, when severe weather warnings are issued in geographic areas, particularly those overseas where Group employees are present, all possible safety measures and precautions are taken.

Organisations are designed to offer an off-site service in the event that teams are forced to work from home by weather conditions.

In the event of violent climate events, local managers are required to check up on the health of their employees. They must also make flexible adjustments to working conditions and methods to enable their staff to respond with equanimity during critical climate episodes.

The Group also ensures that premises, working equipment and materials are not at risk of destruction or severe damage by natural disasters.

Given the nature of its business, the Group is obliged to maintain service continuity by guaranteeing the integrity of all data, in particular by appropriate back-up measures.

The banking regulations to which they are subject also oblige Group entities to draft an emergency and business continuity plan to ensure the continuation of company activities in the event of any serious incident, accident or natural disaster.

This plan identifies the various major risks (not only environmental risks) for each site and sets out crisis management plans. Its main objectives are :

- ensuring the safety and protection of staff, goods or assets,
- minimising the impact on customers or the potential economic loss,
- maintaining critical business functions and regulatory compliance,
- restoring the working environment.

The emergency and business continuity plan covers the following aspects :

- evaluation of the risks related to the location and technical characteristics of each site,
- analysis of the impact of potential incidents on activities,

- installation of and respect for preventive measures,
- preparation and updating of emergency IT and business continuity plans,
- crisis management and launch of emergency and business continuity plans,
- continuity of essential externalised services and key suppliers,
- ongoing staff training with support updated at the end of 2020 to take account of changes in fall-back strategies, which have been significantly amended following the health crisis,
- verification of plans by periodic exercises,
- periodic assessment of the continuity plan (self-assessment, Internal Audit reviews).

When the Group continuity policy was last updated in July 2021, a description of the cyber incident response plan was included. The aim was to strengthen the plan and bring it to the attention of all stakeholders in order to get them involved and make the system more effective. This update was accompanied by exercises to test it and ensure that it was thoroughly understood by the main participants. These exercises included contact tests for employees in certain departments in case the entire IT system of the Group was down, e.g. as a result of a cyber-attack.

Under the authority of the managers of each Group entity concerned, an emergency and business continuity officer is appointed with responsibility for maintaining the plans, training staff and conducting the exercises. His work is supervised by the officer with overall responsibility for emergency and business continuity plans in all the Group's entities.

### Management of risks to customers

As customer-focused banking partners, the Group's entities do their best to provide support in the sometimes distressing experiences that can follow major climate events (storms, hurricanes, floods, etc.), especially in overseas geographic areas.

Apart from financial factors, the Group takes account of the human aspect of lending activities, supporting its customers and taking account of their personal circumstances

# 4 Pillar Innovative lender

MMG is determined to play its part in limiting global warming. This commitment is reflected in the support provided to its customers in their energy transition.

The Group aims to put environmental, social and governance (ESG) criteria at the heart of its development and its financing offers.

Through the MMB Real Estate brand, My Money Bank is an expert player in the professional real estate financing market. Through its «green» offer, set up in 2021, it offers its customers environmentally friendly, solidarity-led financing. It provides a range of services enabling them to access GreenTech partners (such as Longevity Partners, Sitowie, Geosophy, and Neo Eco) or to put them in touch with entities or organisations likely to give them assistance in obtaining grants or subsidies and/or to make donations to associations or companies working for the energy transition and solidarity initiatives.

This offering is addressed to the real estate professionals customers (realtors and developers) for all asset classes (residential, offices, commercial or logistics) in the Ile de France and the main cities in France. It is intended for the financing of green projects, whether works to reduce the energy consumption or CO2 emissions of buildings or to bring them into compliance with the latest environmental regulations. This finance offering is structured around a proposal of dedicated and differentiating services that will support our clients in the various aspects of green projects.

The Group has set a target of 5% of green financing on all new volumes in 2022. In 2022, 10% of MMB Real Estate's new commitments were eligible for this green financing offer. The 2023 target is to reach 15% of new volumes.

Additionally, at the end of 2021, the MMB Real Estate business line developed an ESG rating model internally to measure the Environmental, Social and Governance characteristics (non-financial criteria) for each real estate transaction financed. This rating model has been used to rate new finance granted in 2022 and will continue to be developed and used in 2023.

The rating tool helps to improve the management and guidance for ESG risks within the bank.



In addition, the overseas entities Sorefi and Somafi-Soguafi are positioning themselves locally as responsible players, not least through the promotion of finance for electric and hybrid vehicles since 2018 through the 'Electrik by Sorefi' and 'Electrik by Somafi-Soguafi' brands.

The Group's various business lines are also considering the development of new financing proposals to better support the Group's customers in their environmental transition





# 04 Taxonomy

Since 2018, the European Commission has made a series of commitments and taken regulatory measures to finance sustainable growth and reduce its greenhouse gas emissions in order to achieve carbon neutrality by 2050 and a 55% reduction between 1990 and 2030. In addition to the public funding allocated, the Commission aims to redirect private funding towards more «sustainable» activities. Published in June 2020, the European Taxonomy Regulation should be seen in this context. The text consists of a common classification system for potentially and actually environmentally sustainable activities, based on six objectives :

- climate change mitigation;
- climate change adaptation;
- the sustainable use and protection of water and marine resources
- the transition to a circular economy;
- pollution prevention and control; and
- the protection and restoration of biodiversity and ecosystems.

The Taxonomy distinguishes between eligible and aligned activities. Eligible activities are the activities identified by the Regulation, which has selected the sectors that can contribute most substantially to the six environmental objectives. For climate, these are the sectors that emit the most greenhouse gases, for example the residential and transport sectors. Alignment makes it possible to define, for a specific eligible activity, the share that can be considered as «green» pursuant to the Regulation. This implies that the activity respects the specific requirements listed for it, by sector (the technical criteria); but also that the activity, while making a positive contribution to one of the environmental objectives, does not harm the other five (the «DNSH» principle), and that minimum social safeguards are respected. In July 2021, the list of eligible activities and the technical criteria

for alignment were published for the first two objectives: mitigation and adaptation to climate change. A Delegated Act supplementing Article 8, published in December 2021, clarifies the content of the indicators and how they should be disclosed.

**The Regulation applies to entities required to publish a Statement of Non-Financial Performance (SNFP) under the NFRD and is phased in as follows :**

- For the 2021 reporting period, financial and non-financial undertakings must disclose the proportion of their eligible activities for the first two environmental objectives ;
- For the 2022 reporting period, non-financial undertakings will disclose their share of alignment for the six environmental objec-

tives but financial entities will only have to disclose their share of eligibility for these six objectives ;

- Finally, for the 2023 and subsequent reporting periods, financial and non-financial undertakings will all disclose their share of alignment for the six objectives.

### My Money Group Reporting

My Money Group's activity consists of receiving deposits or other repayable funds from the public and granting loans for its own account. For this reason, as a financial company, My Money Group must comply with the Taxonomy Regulation and must disclose the key performance indicators that have been defined for credit institutions.

Most of My Money Group's activities are concentrated on individual customers, particularly through debt consolidation. The Group also works with companies (financing offer for real estate professionals

or specialised financing in the French overseas departments) but these exposures are much smaller and the great majority of these companies are not themselves subject to Taxonomy reporting (because they are not subject to the NFRD's disclosure obligations). Similarly, exposures to local authorities are marginal. My Money Group's exposures to the counterparties referred to in the Taxonomy are therefore largely concentrated on households. The "eligible" proportion is thus mainly based on the consolidation of mortgage loans to individual customers.

The 2022 reporting results are summarised in the table below. In compliance with the Taxonomy Regulations and the recommendations of the EBA, amounts are reported at gross carrying value (at 31/12/2022) and correspond to the amounts in the FINREP reporting. A note on methodology is given below.

	Amounts (€m)	% of total balance sheet assets	% eligible
<b>Total balance sheet assets</b>	8 534 465	100%	
<b>Total exposures to counterparties referred to in the Taxonomy</b>	5 088 249	60%	
<b>Total exposures to companies not subject to NFRD disclosure requirements</b>	2 465 289	29%	
<b>Interbank demand loans</b>	241 281	3%	
<b>Trading book</b>	56 596	1%	
<b>Exposures to central governments, central banks and supranational issuers</b>	121 672	1%	

4.The Non-Financial Reporting Directive (NFRD) requires large undertakings that are public interest entities exceeding, at the balance sheet date, the criteria of an average number of 500 employees over the financial year and a balance sheet total of more than €20 million or a net turnover of more than €40 million to include a non-financial statement in the management report.

	Amounts (€m)	% of assets covered	% of total balance sheet assets	% eligible 2021	% eligible 2022
<b>Total assets used in calculation of ratios</b>	8 356 196	100%	98%		
<b>Exposures to counterparties referred to in the Taxonomy</b>	5 088 249	61%		42%	44%
<b>of which exposures to companies subject to NFRD disclosure requirements</b>	127 822	2%		0,87%	0,27%
<b>of which exposures to households</b>	4 929 446	59%		41%	44%
<b>Of which commercial real estate loans</b>	3 461 067	41%		41%	41%
<b>Of which automotive loans</b>	226 753	3%		0%	3%
<b>of which exposures to local governments</b>	30 981	0%		0%	0%
<b>Exposures to companies not subject to NFRD disclosure requirements</b>	2 465 289	30%			
<b>Exposures to derivatives</b>	166 407		2%		
<b>Interbank demand loans, cash and other assets<sup>5</sup></b>	636 251		7%		

My Money Group has strengthened its eligibility ratio since last year. This is mainly due to an increase in loans to individuals (from € 4.56 bn to € 4.93 bn), reinforced by the inclusion of motor vehicle loans (3% covered assets) in the eligibility calculation starting in 2022. The marginal reduction in the eligibility of exposures to entities subject to NFRD disclosure requirements is influenced by the Taxonomy eligibility results of those entities themselves.

Starting in 2022, the Group has begun work to analyse the alignment of its exposures, particularly those to individuals (debt consolidation and vehicle loans). These analyses also provide input for the Group's thinking on the incorporation of environmental criteria (and ESG criteria more broadly) in its relations with its clients and counterparties and in the processes for designing

the bank's products and services. Already, My Money Bank (MMB Real Estate), through its financing for real estate professionals, has a green offer to support projects for the renovation or acquisition of buildings that emit less CO<sub>2</sub>, in line with the shift towards financing more activities that are sustainable as defined in the European Taxonomy. Similarly, the overseas subsidiaries Sorefi and Somafi-Soguafi promote financing for hybrid and electric vehicles via the «Elektrik» brand (see section 4. An innovative lender on pages 43 and 44).

Finally, My Money Bank is not exposed to the nuclear energy or fossil gas sectors.

Row	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
Fossil gas related activities		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

Row	Economic Activities	Amount	Pourcentage
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%
7.	Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	0	0%
8.	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI	0	0%

5. Tangible assets, intangible assets, tax assets, other assets, non-current assets and disposal groups classified as held for sale, and provisions

Row	Economic Activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM+CCA)		Climate Change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
7.	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	0	0%	0	0%	0	0%
8.	Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	0	0%	0	0%	0	0%



05

Note on  
Methodology

## Scope of the present statement :

The scope of this statement is the consolidation scope of the financial holding company Promontoria MMB and all its operational subsidiaries existing at 31 December 2022, namely :

- My Money Bank,
- Banque des Caraïbes,
- Somafi-Soguafi,
- Sorefi,
- SLMB,
- MMB SCF,
- BESV Courtage.

### Relevance of the information

The Group's statement of non-financial performance only relates to the risks, challenges and opportunities that are relevant in light of its business model.

### Description of policies

For each significant risk, a description is presented of the policies adopted to prevent, identify or mitigate its occurrence.

### Indicators on the number and percentage of employees who have followed dedicated GDPR training

The completion rate is calculated as the difference between the number of employees who have completed the training and the total number of employees in the Group. Includes internal staff (permanent contracts, fixed-term contracts, professional contracts, trainees, temporary workers, external service providers). Excludes agents and inactive employees (maternity leave, sabbatical leave, long-term leave).

### Company indicators

#### Net Promoter Score :

The ENPS (Employee Net Promoter Score) uses the same calculation as the NPS, applied to employees. All our staff (including trainees) regularly answer the question «How likely would you be to recommend your company to a friend or colleague?» on a scale of 1 to 10. The ENPS is calculated by subtracting the percentage of employees who scored less than 6 (non-ambassadors) from the percentage of employees who scored 9 or 10 (ambassadors), with employees who scored 7 or 8 being assumed to be passive..

#### Distribution of employees by age, gender and average age

The graphics showing the distribution of employees present on 31 December 2022 by age and gender cover all employees, excluding trainees and corporate officers.

#### Total number total of training hours

The total number of training hours includes training carried out by all staff and excludes students on placement and trainees.

#### Number of staff recruited (permanent and fixed-term contracts)

The number of recruitments includes the staff of My Money Bank and its subsidiaries and of the Banque des Caraïbes and excludes students on placement and trainees.

#### Number of employees benefitting from the obligation to employ workers with disabilities

This indicator counts the number of employees benefitting from the obligation to employ disabled workers across all the Group's entities, all contracts included.

#### Energy indicator:

The scope used for the Group's carbon footprint corresponds to scopes 1 and 2.

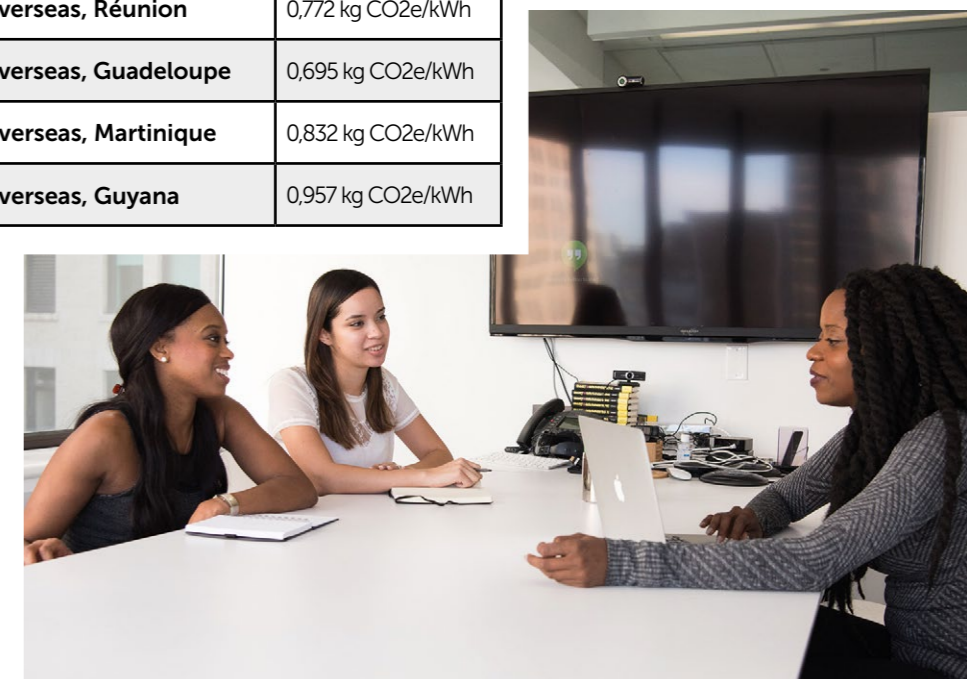
#### Electricity consumption

The consumption of electricity by all the Group's companies has been calculated on the basis of the invoices issued for 2022.

In the case of BDC, invoices were unavailable for some months and in these cases consumption has been estimated on the basis of the average consumption during the other months.

The calculation of the carbon content of electricity (in tonnes of CO2 equivalent) is obtained by multiplying the total annual consumption in kWh by an emission factor published on the ADEME site.

Electricity – average mix – consumption – Mainland France	0,0569 kg CO2e/kWh
Electricity – average mix – consumption – Overseas, Réunion	0,772 kg CO2e/kWh
Electricity – average mix – consumption – Overseas, Guadeloupe	0,695 kg CO2e/kWh
Electricity – average mix – consumption – Overseas, Martinique	0,832 kg CO2e/kWh
Electricity – average mix – consumption – Overseas, Guyana	0,957 kg CO2e/kWh



### Fuel consumption

Fuel consumption for the Group's entities has been calculated on the basis of the actual consumption of fuel in litres by company vehicles during the past reporting period. The conversion factors used to calculate the associated greenhouse gas emissions are taken from the ADEME "Base Carbon" database.

It should be noted that BDC's fuel consumption has not been taken into account in the calculation of Group consumption due to the absence of reported data. A monitoring tool was introduced on 1 January 2023.

<b>Petrol</b> – Unleaded premium grade (95, 95-E10, 98) – <b>Mainland France</b>	2,7 kgCO <sub>2</sub> e/litre
<b>Petrol</b> – Unleaded premium grade (95, 95-E10, 98) – <b>Réunion</b>	2,90 kgCO <sub>2</sub> e/litre
<b>Petrol</b> – Unleaded premium grade (95, 95-E10, 98) – <b>Guadeloupe, Martinique, Guyana</b>	2,84 kgCO <sub>2</sub> e/litre
<b>Diesel</b> – Non-road diesel – <b>Réunion</b>	3,04 kgCO <sub>2</sub> e/litre
<b>Diesel</b> – Non-road diesel – <b>Guadeloupe, Martinique, Guyana</b>	2,95 kgCO <sub>2</sub> e/litre
<b>Diesel</b> – Non-road diesel – <b>Mainland France</b>	3,04 kgCO <sub>2</sub> e/litre

### Ground and air travel

CO<sub>2</sub> emissions for the Group's entities were calculated on the basis of the amounts of expense claims submitted in 2022 (amounts excluding taxes, or including taxes if the amounts net of taxes are unavailable). The conversion factors used are taken from the ADEME "Base Carbon".

It should be noted that travel undertaken by BDC staff has not been taken into account in the calculation of Group emissions due to the absence of reported data.

A monitoring tool was introduced on 1 January 2023.

<b>Ground service / transport</b> – <b>Mainland France</b>	560 kgCO <sub>2</sub> e/k€
<b>Air service / transport</b> – <b>Mainland France</b>	1.19e+3 kgCO <sub>2</sub> e/k€

### Taxonomy

The information below provides context for the quantitative indicators and clarifies the range of assets and activities covered by the indicators published in Chapter III, the sources of the data and any limitations. Items in quotation marks refer to the items in Annex VI of the Taxonomy Regulation.

**For individual customers ("households"), the amounts correspond to the following exposures :**

- **"Residential real estate lending"** : for My Money Group, these loans relate to loan purchases and consolidation backed by a property loan or "credit logement" guarantee. The consolidation of several loans by My Money Group (including non-real estate lending) was assumed to be included in this asset class, as long as an underlying real estate guarantee was present. As construction and real estate activities are directly covered by the Taxonomy for climate objectives, these amounts are reported as eligible.
- **"Motor vehicles"** : for My Money Group, these are vehicle loans. These loans represent a significant part of the retail lending business for My Money Group's overseas subsidiaries. In compliance with the Delegated Regulation (EU) 2021/2178, only stocks produced after 2022 are reported
- **"Other"** : other loans are not allocated and clients can use them as they see fit. It is impossible at present to identify the loans "for the renovation of a building". These unallocated loans are therefore not eligible.

With regard to local authorities ("local government financing"), some of the financing of Banque des Caraïbes is exposed to this. However, this financing is minor and mainly concerns non-allocated loans (cash credit facility) to hospitals, municipalities and groups of municipalities. It was considered that this was not specialised financing and these amounts were considered not eligible.

Finally, for undertakings, the majority of My Money Group activities focus on VSEs/SMEs, which explains the low exposure to NFRD entities («Financial and non-financial undertakings subject to NFRD disclosure requirements») and the low proportion of eligibility within the corporate portfolio. The majority of the amount arising from exposures to NFRD undertakings relates to debt securities in which the Group invests, mainly for liquidity management purposes. The eligibility of these debt securities is reported on the basis of the eligibility ratios published by the counterparties of these investments.

### Choice of independent third-party body

The company Promontoria MMB has appointed KPMG S.A. as an independent third party charged with verifying, in accordance with the provisions of article R.225-105-2 of the Commercial Code, the compliance of the present statement of non-financial performance and the accuracy of the 2022 information it contains. The report drawn up by KPMG as an independent third party appears in annex to the present statement of non-financial performance.

**SNFP - 2022 financial year**

This table includes the main performance indicators monitored by the Group in 2022. With its new formalised CSR strategy, and with a view to the implementation of future CSRD reporting, the Group has identified new monitoring indicators which will be introduced gradually and included in the next Statement of Non-Financial Performance.

Category	Extra-financial risks	Policies/Actions implemented	Label/Indicators	Indicators N-2 As of 12/13/20	Indicators N-1 As of 12/13/21	Indicators N As of 12/13/22	Pages
Committed employer	Attracting and retaining talents	Recruitment policy : Including « My Best Colleague » coopting policy	Number of recruitments :	My Money Bank : 21 permanent and 1 fixed-term contracts Overseas subsidiaries : 9 permanent and 3 fixed-term contracts My Partner Bank : 9 permanent and 3 fixed-term contracts	My Money Bank : 54 permanent and 10 fixed-term contracts Overseas subsidiaries : 8 permanent and 3 fixed-term contracts BdCs : 17 permanent and 10 fixed-terme contracts	My Money Bank : 102 permanent and 5 fixed-term contracts Overseas subsidiaries : 40 permanent and 6 fixed-term contracts BdCs : 40 permanent and 3 fixed-term contracts	43
			Total workforce and distribution by age, gender and average age of employees	Please refer to charts in the SNFP			43-44
		Remuneration Policy	Mandatory annual negotiations (NAO)		Budget of 1% of the payroll 1,3% for BdC	Budget of 1,6% of the payroll 0,8% for BdC	44
			Salary increase		Nearly 92% of the total	Nearly 86% of the total	44
		Remuneration policy : Reducing the gender pay gap	Gender equality Index		MMB : 90 points Somafi-Soguafi : 89 points Sorefi : 93 points BdC : 84 points	MMB : 85 points Somafi-Soguafi : 91 points Sorefi : 89 points BdC : 89 points	44
		Talents retention: developing the recognition system	Number of awards distributed :	Almost 180 awards	Almost 250 awards	Almost 218 awards	44-45
		Training and support : Monitoring of total number of training hours	Total nuber of training	5,500 hours	16,594 hours	14,000 hours	45-46
	Staff commitment	Staff appraisal : « Talentsoft » tool for setting targets and for performance monitoring					46
		Social dialogue and collective agreements : NAO signed in 2022					46
		Measuring employees engagement	eNPS : Employee Net Promoter Score	NA	21	21	48
		Acknowledgment or congratulations between employees	Number of superlikes sent	NA	3600	4215	48
		General well being: Regular employee surveys via the Supermood tool					
	Diversity and equal opportunities	Measures in favor of the employment of people with disabilities (Number of employees declared to have a RQTH)	Number of employees declared to have a RQTH	Total of 13 employees	Total of 17 employees	Total of 23 employees	49
		Mix My Group Community	Pr omotional actions on diversity and inclusion and dedicated training for women19Committed				38-39



Category	Extra-financial risks	Policies/Actions implemented	Label/Indicators	Indicators N-2 As of 12/13/20	Indicators N-1 As of 12/13/21	Indicators N As of 12/13/22	Pages	
Ethical Partner	Responsible distribution of products	Legal and regulatory monitoring system: Maintenance of quarterly monitoring of the Risk Appetite of the regulated entities					53	
		Training of employees and intermediaries: Implementation and follow-up of reinforced modules (anti-bribery, AML-CFT, and economic sanctions)	Percentage of employees who have completed the e-learning module on GDPR awareness	90% of employees trained 100% of the members of the Group' various boards of Directors	86% of employees 94% by 1st quarter 2022	94% of employees	54	
		Anti-money laundering, countering terrorist financing, anti-bribery and anti-tax evasion measures: further harmonisation of policies and procedures within the group					55-56	
		"Ombudsman" system of internal alert and mediation						
	Data protection and cybersecurity	Measures for data protection and IT security: further standardisation and strengthening of processes						60
		A Data Protection Officer (DPO) for each regulated entity						60
		Existence of a group Data Privacy Committee						
IT performance	Deployment of a digital measure to digitise operational management of MMB Real Estate BU				Implemented	61		
Climate player	Environmental concerns	MMG's carbon footprint		NA	NA	Achieved in 2021	64-65	
		Signature of the Ecowatt charter in 2022		NA	NA	Signed	67	
	Failure to adapt activity to environmental challenges	Energy performance policy on our premises	CO2 emissions from electricity consumption	1.092.915 kWh, or 326,58 tonnes of CO2	1.696.154 kWh, or 892,37 tonnes of CO2	1.552.465 kWh, or 651 tonnes of CO2	69	
		Energy consumption	CO2 emissions from business travel (car)	329,66 tonnes of CO2	261,54 tonnes of CO2 (excluding BdC)	320,32 tonnes of CO2 (excluding BdC)	69	
		Responsible consumption policy	Other ground travels/air travels	NA	NA	79,67 tonnes of CO2 445,08 tonnes of CO2	70	
	The physical risks of extreme climate events	Adaptation devices in the event of a weather warning		Periodic monitoring and updating of the emergency and business continuity plan			72	
Innovative lender	Limiting global warming and supporting customers and partners in their environmental transition	Green financing offer for MMB real estate customers	% of green loans granted			10% of the financing granted by MMB real estate	74	
		ESG rating of MMB Real estate customers (Developed in 2021)	% of files rated			68% of new files rated	74-75	



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# Promontoria MMB S.A.S.

**Report by the Statutory Auditor, appointed as independent third party,  
on the verification of the consolidated non-financial statement**

For the year ended 31 December 2022  
Promontoria MMB S.A.S.  
20 avenue André Prothin, 92063 Paris - La Défense  
*This report contains 7 pages*



**Promontoria MMB S.A.S.**

Report by the Statutory Auditor, appointed as independent third party,  
on the non-financial statement

12<sup>th</sup> May 2023

**Promontoria MMB S.A.S.**

Registered office: 20 avenue André Prothin, 92063 Paris - La Défense

**Report by the Statutory Auditor, appointed as independent third party, on the verification of the consolidated non-financial statement**

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*This is a free English translation of the Statutory Auditor's report issued in French and is provided solely for the convenience of English-speaking readers. This report should be read in conjunction with, and construed in accordance with, French law and professional standards applicable in France.*

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For the year ended 31 December 2022

To the Annual General Meeting,

In our capacity as Statutory Auditor of your company (hereinafter the "entity") appointed as independent third party, and accredited by the French Accreditation Committee (COFRAC) under number 3-1884<sup>1</sup>, we have undertaken a limited assurance engagement on the historical information (observed or extrapolated) in the consolidated non-financial statement, prepared in accordance with the entity's procedures (hereinafter the "Guidelines"), for the year ended 2022 (hereinafter, the "Information" and the "Statement" respectively), included in the entity's management report pursuant to the requirements of Articles L. 225-102-1, R. 225-105 and R. 225-105-1 of the French Commercial Code (*Code de commerce*).

**Conclusion**

Based on the procedures we have performed, as described under the "Nature and scope of procedures" and the evidence we have obtained, nothing has come to our attention that cause us to believe that the non-financial statement is not prepared in accordance with the applicable regulatory provisions and that the Information, taken as a whole, is not presented fairly in accordance with the Guidelines, in all material respects.

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<sup>1</sup> Accreditation Cofrac Inspection, number 3-1884, scope available at [www.cofrac.fr](http://www.cofrac.fr)



**Promontoria MMB S.A.S.**

*Report by the Statutory Auditor, appointed as independent third party,  
on the non-financial statement*

*12<sup>th</sup> May 2023*

## **Preparation of the non-financial performance Statement**

The absence of a commonly used generally accepted reporting framework or a significant body of established practices on which to draw to evaluate and measure the Information allows for different, but acceptable, measurement techniques that can affect comparability between entities and over time.

Consequently, the Information needs to be read and understood together with the Guidelines, summarized in the Statement and available on the Entity's website or on request from its headquarters.

## **Inherent limitations in preparing the Information**

The Information may be subject to uncertainty inherent to the state of scientific and economic knowledge and the quality of external data used. Some information is sensitive to the choice of methodology and the assumptions or estimates used for its preparation and presented in the Statement.

## **Responsibility of the entity**

Management of the Entity is responsible for:

- selecting or establishing suitable criteria for preparing the Information;
- preparing a Statement pursuant to legal and regulatory provisions, including a presentation of the business model, a description of the main non-financial risks, a presentation of the policies implemented considering those risks and the outcomes of said policies, including key performance indicators, and the information set out in Article 8 of Regulation (EU) 2020/852 (Green Taxonomy);
- preparing the Statement by applying the Entity's "Guidelines" as referred above; and
- designing, implementing and maintaining internal control over information relevant to the preparation of the Information that is free from material misstatement, whether due to fraud or error.

The Statement has been prepared by the Management Board.

## **Responsibility of the Statutory Auditor, appointed as independent third party/independent third party**

Based on our work, our responsibility is to provide a report expressing a limited assurance conclusion on:

- The compliance of the Statement with the requirements of Article R. 225-105 of the French Commercial Code;



**Promontoria MMB S.A.S.**

Report by the Statutory Auditor, appointed as independent third party,  
on the non-financial statement

12<sup>th</sup> May 2023

- The fairness of the historical information (observed or extrapolated) provided pursuant to part 3 of sections I and II of Article R. 225-105 of the French Commercial Code, i.e., the outcomes of policies, including key performance indicators, and measures relating to the main risks.

As we are engaged to form an independent conclusion on the Information as prepared by management, we are not permitted to be involved in the preparation of the Information as doing so may compromise our independence.

It is not our responsibility to report on:

- The entity's compliance with other applicable legal and regulatory provisions (particularly with regard to the information set-out in Article 8 of Regulation (EU) 2020/852 (Green taxonomy);
- The fairness of information set out in Article 8 of Regulation (EU) 2020/852 (Green Taxonomy);
- the compliance of products and services with the applicable regulations.

### **Applicable regulatory provisions and professional guidance**

We performed the work described below in accordance with Articles A. 225-1 et seq. of the French Commercial Code, the professional guidance issued by the French Institute of Statutory Auditors (*Compagnie Nationale des Commissaires aux Comptes*) applicable to such engagement, in particular the professional guidance issued by the Compagnie Nationale des Commissaires aux Comptes, "*Intervention du commissaire aux comptes - Intervention de l'OTI - Déclaration de performance extra-financière*", acting as the verification program, and with the International Standard on Assurance Engagements 3000 (revised)<sup>2</sup>.

### **Our independence and quality control**

Our independence is defined by the provisions of Article L. 822-11 of the French Commercial Code and the French Code of Ethics for Statutory Auditors (*Code de déontologie*) of our profession. In addition, we have implemented a system of quality control including documented policies and procedures aimed at ensuring compliance with applicable legal and regulatory requirements, ethical requirements and the professional guidance issued by the French Institute of Statutory Auditors (*Compagnie Nationale des Commissaires aux Comptes*) relating to this engagement.

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<sup>2</sup> ISAE 3000 (Revised) - *Assurance Engagements Other Than Audits or Reviews of Historical Financial Information*



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## **Means and resources**

Our work engaged the skills of six people between February and May 2023 and took a total of four weeks.

We were assisted in our work by our specialists in sustainable development and corporate social responsibility. We conducted a dozen interviews with the people responsible for preparing the Statement.

## **Nature and scope of procedures**

We are required to plan and perform our work to address the areas where we have identified that a material misstatement of the Information is likely to arise.

The procedures we performed were based on our professional judgment. In carrying out our limited assurance engagement on the Information:

- We obtained an understanding of all the consolidated entities' activities, and the description of the principal risks associated;
- We assessed the suitability of the criteria of the Guidelines with respect to their relevance, completeness, reliability, neutrality and understandability, taking into account, where appropriate, best practices within the sector;
- We verified that the Statement includes each category of social and environmental information set out in article L. 225-102-1 III of the French Commercial Code.
- We verified that the Statement provides the information required under article R. 225-105 II of the French Commercial Code, where relevant with respect to the main risks, and includes, where applicable, an explanation for the absence of the information required under article L. 225-102-1 III, paragraph 2 of the French Commercial Code;
- We verified that the Statement presents the business model and a description of principal risks associated with all the consolidated entities' activities, including where relevant and proportionate, the risks associated with their business relationships, their products or services, as well as their policies, measures and the outcomes thereof, including key performance indicators associated to the principal risks;
- We referred to documentary sources and conducted interviews to:
  - assess the process used to identify and confirm the main risks as well as the consistency of the outcomes, including the key performance indicators used, with respect to the main risks and the policies presented;
  - corroborate the qualitative information (measures and outcomes) that we considered to be the most important presented in Appendix. Concerning certain risk<sup>3</sup>, our work was carried out on the consolidating entity, for the other risks, our work was carried out on the consolidating entity and on a selection of entities<sup>4</sup>.

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<sup>3</sup> Employee commitment, Responsible product distribution, Data protection and cybersecurity, IT performance, Physical risks linked to violent climatic events, Environmental concern, Limiting global warming and supporting customers in their energy transition.

<sup>4</sup> My money Bank S.A., Somafi-Sogafi S.A.



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- We verified that the Statement covers the scope of consolidation, i.e. all the consolidated entities in accordance with article L. 233-16 of the French Commercial Code, within the limitations set out in the Statement];
- We obtained an understanding of internal control and risk management procedures the Entity has implemented and assessed the data collection process aimed at ensuring the completeness and fairness of the Information;
- For the key performance indicators and other quantitative outcomes that we considered to be the most important presented in Appendix, we implemented:
  - analytical procedures to verify the proper consolidation of the data collected and the consistency of any changes in those data;
  - tests of details, using sampling techniques, in order to verify the proper application of definitions and procedures and reconcile the data with supporting documents. This work was carried out on a selection of contributing entities <sup>4</sup> and covers between 39% and 100% of the consolidated data relating to the key performance indicators and outcomes selected for these tests;
- We assessed the overall consistency of the Statement based on our knowledge of all the consolidated entities.

The procedures performed in a limited assurance review are less in extent than for a reasonable assurance opinion in accordance with the professional guidance of the French Institute of Statutory Auditors (*Compagnie Nationale des Commissaires aux Comptes*); a higher level of assurance would have required us to carry out more extensive procedures.

Paris-La Défense, 12<sup>th</sup> May 2023

KPMG S.A.

Nicolas Bourhis  
*Partner*

Arnaud Bourdeille  
*Partner*

Anne Garans  
*ESG Expert*



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12<sup>th</sup> May 2023

## Appendix

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### Qualitative information (actions and results) considered most important

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System set up to encourage dialogue between management and employees

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Company agreement in favor of professional equality

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System for thanking and encouraging employees

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Actions to promote the integration of disabled people

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Waste treatment and recycling system

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Measures in favor of the implementation of an Emergency Business Continuity Plan (PUPA)

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Financing schemes to promote green growth and energy transition

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Business conduct and anti-corruption procedures

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Policies in place to ensure products and services are accessible to all customers

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Actions in favor of data protection

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### Key performance indicators and other quantitative results considered most important

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Total headcount and breakdown by age and gender

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Total number of hours of training

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Number of new hires

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Net Promoter Score

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Number of employees declared as having RQTH disability certification

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Electricity consumption; CO2 emissions related to electricity consumption

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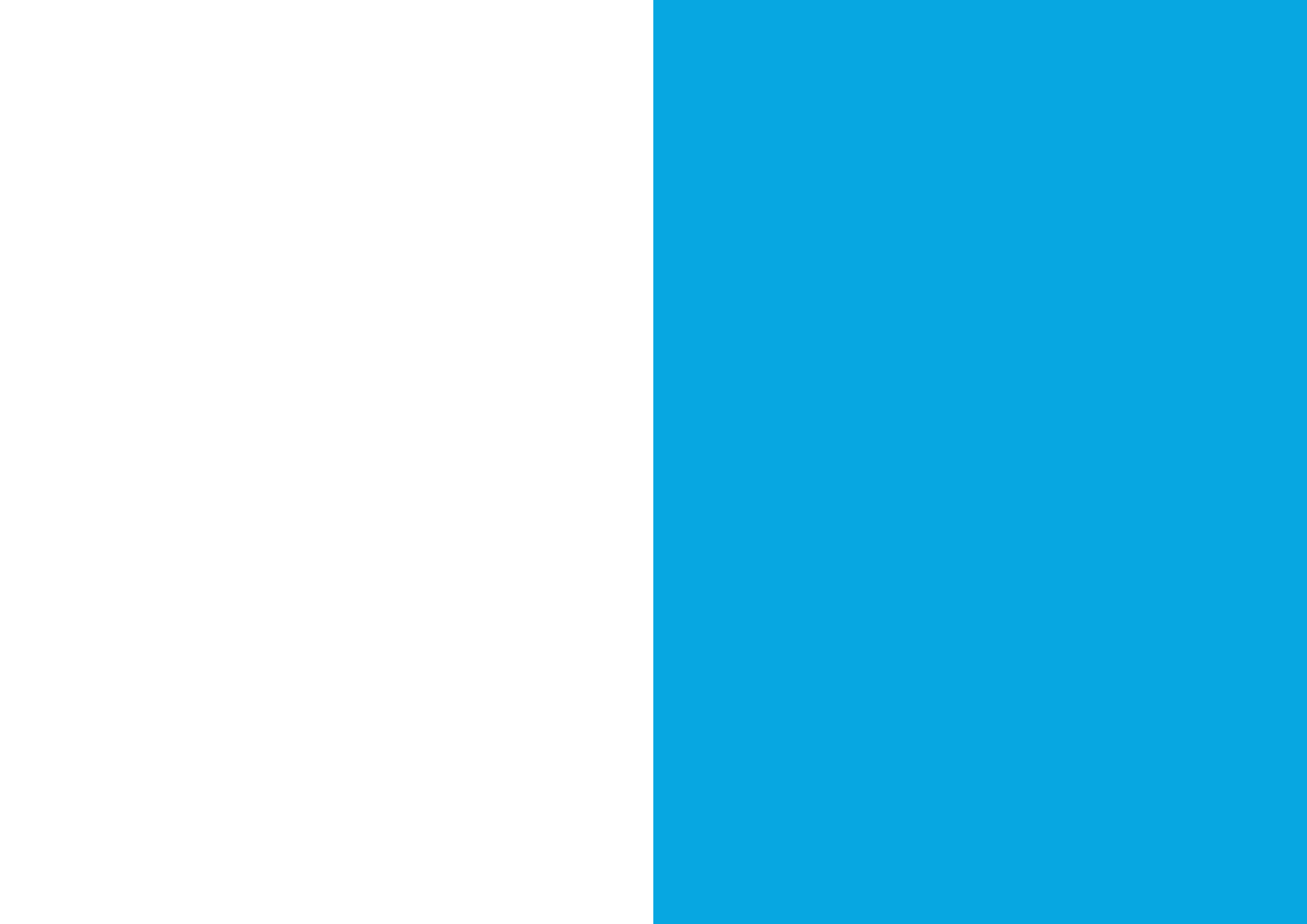
CO2 emissions related to business travels (car)

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Percentage of employees who have taken the e-learning module dedicated to GDPR awareness

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