2024 Annual report

ESG CLIMATE GROUPAMA

ESG-CLIMATE REPORT
JUNE 2025

LE GROUPE Groupama

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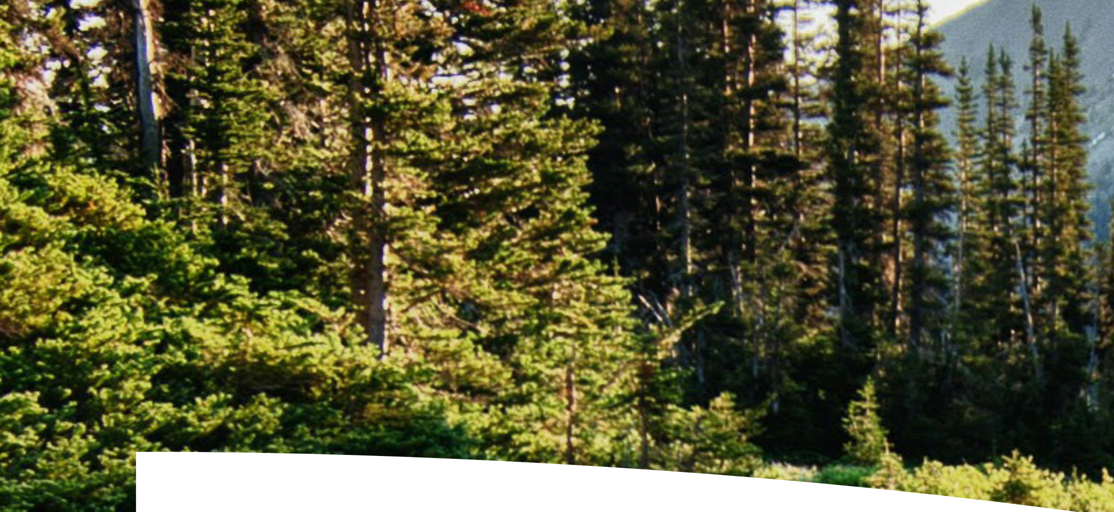


EDITORIAL

TURNING OUR COMMITMENTS INTO ACTION: INVESTMENT IN SUPPORT OF A SUSTAINABILITY PATHWAY

The year 2024 marks a consolidation phase in terms of sustainability for the Group. Following a year of strengthened governance and the structuring of our action plan in 2023, we are continuing the concrete implementation of our commitments.

This year, we published our first sustainability report in line with the CSRD framework, covering all our activities as insurer and investor. This demanding framework enabled us to identify our most material ESG issues through a double materiality analysis and confirmed a key point: our role as an investor is central to tackling sustainability challenges.

This report, prepared under Article 29 of the Energy-Climate Law, offers a specific focus on our investment activities. It serves both as a regulatory transparency exercise and a statement of strategic positioning: we share here our convictions, progress, and ambitions.

This year again, several key milestones were reached within our investments:

- **A 60% decrease in the carbon intensity** of our listed equity and private bond portfolios since 2021;
- **The extension of our fossil fuel exclusion policy** to conventional oil and gas, reinforcing our alignment with our Net Zero Asset Owner Alliance (NZAOA) commitments;
- **€1.04 billion in additional sustainable investments**, reflecting our financial commitment to supporting the transitions;
- **The consolidation of our biodiversity strategy** through the development of a strategic biodiversity scorecard.

These achievements were made possible by significant resources and the involvement of our governance bodies: €1.5 million was allocated to ESG-related internal resources, and 144 board members were trained across 11 company boards within the Group.

Building a sustainable investment pathway is a long-term, demanding, and transformative journey. It is not just about setting objectives but about transforming practices, equipping business lines, and fostering a consistent, long-term evolution of our investment culture.

This report is a testament to that journey and reflects our determination to translate our commitments into concrete actions, in service of our mutualist model and our purpose: enabling as many people as possible to build their lives with confidence. In doing so, Groupama reaffirms its intention to take tangible action in support of the transitions.

MIKAEL COHEN
Chief Investment Officer, Groupama

DISCLAIMER –
PURPOSE OF THE REPORT

Groupama is publishing this report on a voluntary basis as part of its commitment to transparency towards all its stakeholders. It contains most of the information required by the decree implementing Article 29 of the so-called “energy-climate” law. Through this report, the Group wishes to highlight its ongoing commitments and the actions undertaken in environmental, social and governance (ESG) matters.

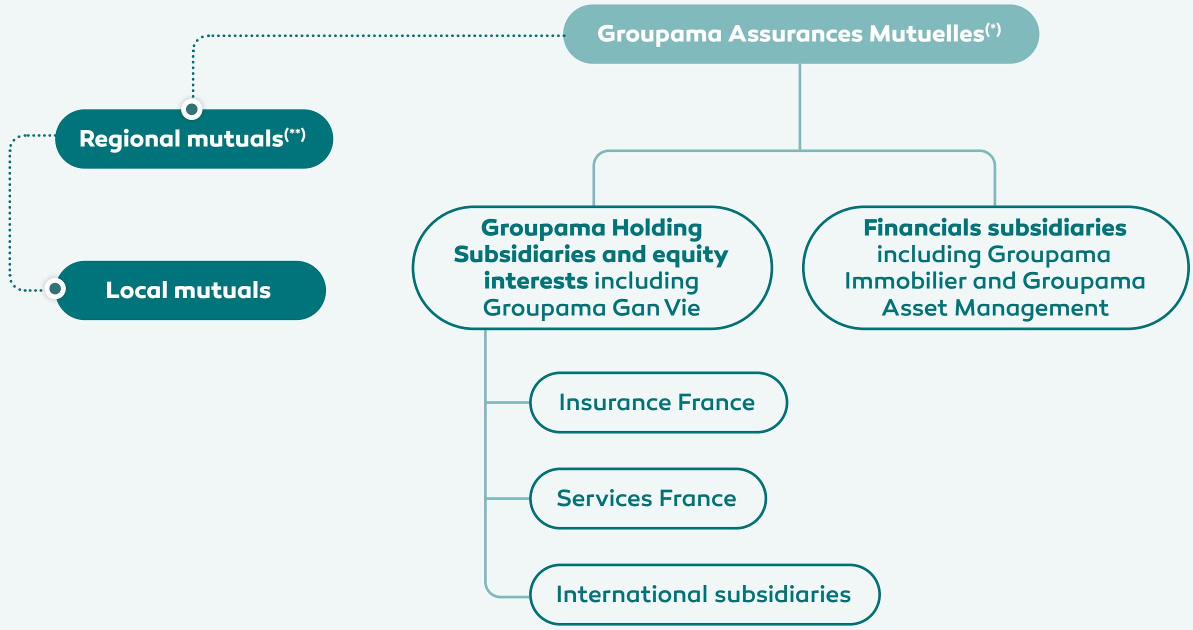
The scope of this report covers the investment activities of Groupama Assurances Mutuelles (GMA), the French insurance subsidiaries, the international subsidiaries and all the Group’s Regional Mutuals.

Groupama Asset Management (Groupama AM or GAM) and Groupama Immobilier (GI) are referred to in this report solely for their activities as the Group’s internal asset managers.

In the interests of sincerity and verifiability, this report is intended to be clear and transparent with regard to the data and methodologies used. Lastly, all figures are exclusive of unit-linked insurance, unless otherwise stated.

PRESENTATION OF THE GROUP

Groupama Assurances Mutuelles is the central body of the Group, whose sole shareholders are the regional mutuals. It ensures, among other responsibilities, the Group's financial security. The Group comprises three types of entities:



(*) As reinsurer of the regional mutuals, through a quota share treaty, GMA carries approximately 30% of the regional mutuals' portfolios

(**) 9 mainland mutuals, 2 overseas mutuals and 2 specialized mutuals

...... Reinsurance link

The French insurance subsidiaries, the main one being Groupama Gan Vie (GGVie), fully delegate asset management to the Financial Operations and Investments Division (DOFI) of Groupama Assurances Mutuelles, which defines and oversees investment policies. The DOFI is responsible for managing unlisted assets (corporate private equity, infrastructure, private debt, and diversified real estate funds). For most of the remaining assets, the DOFI delegates to:

- **Groupama Asset Management** (GAM) for listed asset management via mandates that integrate ESG principles aligned with the Group's sustainable investment charter;
- **Groupama Immobilier** (GI) for real estate management through property and lease mandates.

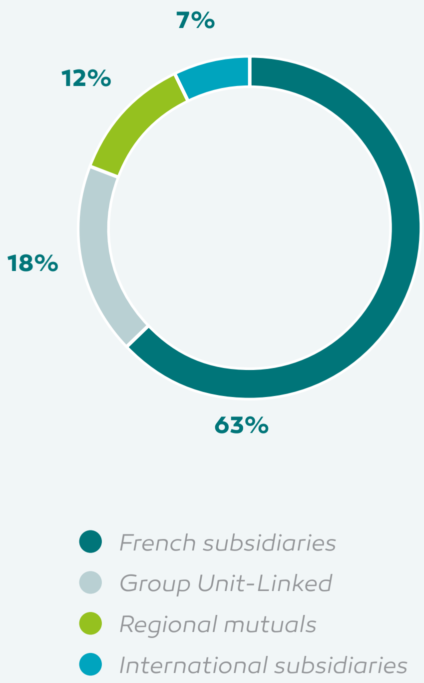
Groupama Asset Management and Groupama Immobilier are the two financial subsidiaries of the Group. They are mentioned in this report in their capacity as Group asset managers, but are not formally covered by the scope of the report.

The regional mutuals manage their assets independently, although they delegate part of the listed asset management to GAM. For unlisted assets, they invest partly through funds selected by the DOFI or through Group vehicles, and delegate part of their real estate management to Groupama Immobilier. For the remainder of their assets, they operate autonomously, but must comply with the Group's Sustainable Investment Charter.

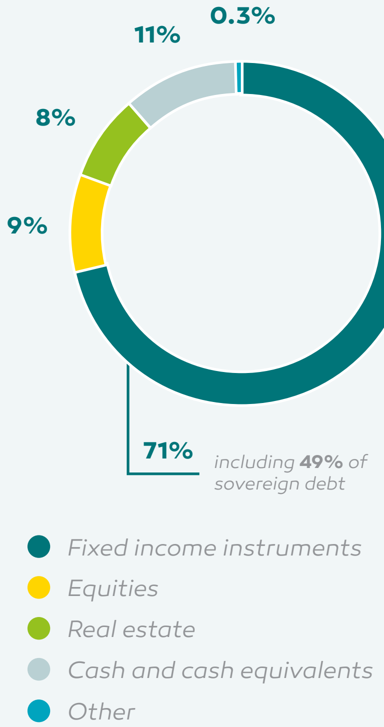
The international subsidiaries have a hybrid model: they are responsible for their own asset management but define their investment strategy jointly with the DOFI. Most of their listed assets are managed by GAM under mandate. For unlisted assets, they invest partly through Group vehicles and partly independently.

As of year-end 2024, the Group's investment assets amounted to €66.3 billion in market value, excluding unit-linked products (ULs), repos and repo funds, and intra-group loans. An additional €15.2 billion was invested in ULs.

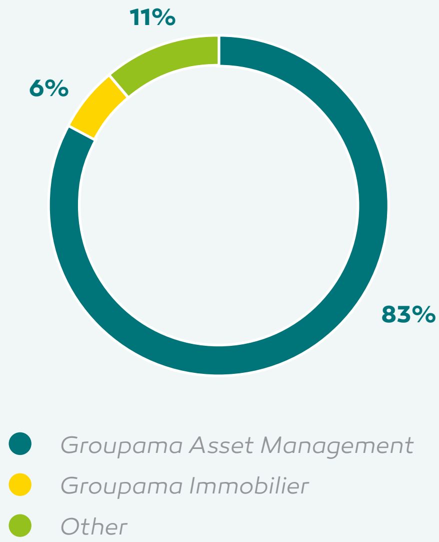
Breakdown of Groupama assets at market value as of 31/12/2024



Breakdown of the asset portfolio at market value as of 31/12/2024



Breakdown of Groupama assets at market value as of 31/12/2024



Unless otherwise stated, the rest of the report covers the Group's investment assets excluding ULs, totalling €66.3 billion in market value.

Additionally, the entire portfolio was made transparent.

KEY FIGURES FOR 2024

Governance

144

board members trained across 11 boards of directors concerned

Internal resources

€1.5m

allocated to ESG, of which **€818,000 dedicated to ESG data**

Biodiversity

28%

of the covered assets in the equity and corporate bond portfolios are at least highly dependent on an ecosystem service

Risk monitoring

5[1]

ESG indicators tracked under the ORSA framework

ESG analysis coverage rate

89%

of assets covered by the ESG analysis

Sustainable investments

+ €1,039m

in additional sustainable investments during the year

Investment portfolio decarbonization

-60%

tCO_2eq/€m in revenue for the listed equities and private bond portfolio as of 31/12/2024

+

Extension of the fossil fuel policy to include conventional oil and gas

[1] Following the change of provider (from Iceberg Data Lab to MSCI), the Group replaced the "temperature indicator" with the "balance sheet value breakdown across the 3 categories of natural capital." See Section VIII: Integration of ESG Criteria in Risk Management.

I. OVERVIEW OF OUR ESG APPROACH

A. A STRATEGY BASED ON THE GROUP'S SUSTAINABILITY POLICY, APPLIED TO ITS INVESTMENTS THROUGH A DEDICATED CHARTER

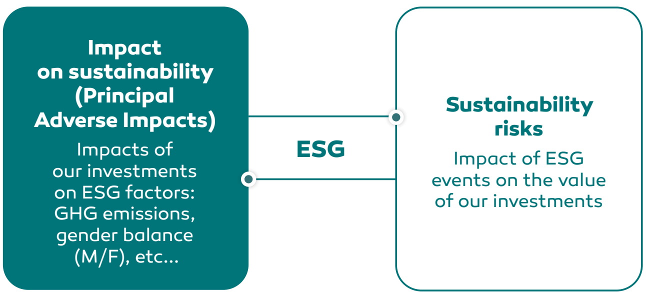
> This year, for the first time, the Group published its sustainability report in the CSRD (*Corporate Sustainability Reporting Directive)* format, which allowed it to present, through approximately 150 indicators, its overall ESG performance across all of its business lines. Indeed, unlike this document which focuses specifically on the Group's investments, the CSRD report covers the main sustainability issues identified through a "double materiality" analysis across the entire value chain.

The Group's sustainability strategy is rooted in its identity as a mutual insurance company of agricultural origin, founded over 100 years ago by and for its members. Groupama integrates sustainability issues into its insurance, prevention, and local development activities, as well as its investment operations. Its purpose – "to enable as many people as possible to build their lives with confidence" – guides the Group's commitment to offering effective and sustainable solutions in response to major social and environmental challenges.

> For the Group, integrating ESG factors into investment processes supports both financial risk management and the financing of transitions.

Groupama operates under a double materiality logic, based on managing:

- **Sustainability risks,** i.e. risks to the value or return of financial assets due to ESG factors, especially climate-related;
- **Negative impacts** of investments on ESG factors.



In its first CSRD report, the Group identified three main issues related to its investment activities:

- **The exposure of some investments to physical and transition risks related to climate and biodiversity.** These risks may cause a loss in value of the most exposed assets;
- The potential negative impacts of **contributing to climate change and biodiversity loss** through the financing of irresponsible issuers or sectors with strong negative environmental impacts;
- The potential negative impacts **of indirectly contributing to risks related to human rights and labor conditions** through financing countries or companies with harmful social practices.

[2] https://www.groupama.com/fr/publications-rse/

OUR RESOURCES

HUMAN

57,000 mutualists and employees

FINANCIAL

Premiums: **€18,503 m**
Insurance investments: **€67,219 m**
Equity funds: **€10,487 m**
Mutual certificates: **€634 m**
Balance sheet: **€89,396 m**

ORGANISATIONAL AND INTELLECTUAL

- Mutual organisation on 3 levels, based on elected representatives and a local reinsurance system:
  2,400 local branches
  13 regional/specialised mutuals
  2 overseas mutuals
  1 national reinsurer
- Expertise (actuarial models, know-how in 120+ fields)
- Academic/economic/territorial partnerships
- Hybrid distribution networks (physical + digital):
  2 complementary brands
  40 companies including
  21 specialised in insurance
  6 digital service providers
  2,600 advisors (including 1,500 Gan exclusive agents)

Regional decision-making centers, IT systems, and call centers distributed across France. **Internationally, in 7 countries (**):** growth drivers, diversification, and best practices

ENVIRONMENTAL

Internal scope: -**44.7%** CO_2 emissions (vs 2019)

Forest heritage: **22,400 ha** managed by Société Forestière Groupama.

(**) Excluded from the combined scope: entities in China and Tunisia.

GROUPAMA, OUR BUSINESS MODEL

MUTUAL INSURANCE COMPANY ROOTED IN LOCAL TERRITORIES, COMMITTED TO GLOBAL AND SUSTAINABLE SUPPORT FOR MEMBERS AND CLIENTS

>> **a dense territorial network, communities of human support, close and united, responding closely to the needs of members and clients.**

Important: data available as of 17/03/2025.

OUR VALUE CREATION

HUMAN

€1.5 bn in salaries and social contributions
9 out of 10: employees trained and engaged in performance reviews
78% employee engagement (2023 Barometer)

FINANCIAL

Net income: **€961 m**
Positive operating result: **€954 m**
Net combined ratio: **95.1%**
S&P rating: **A+**, stable outlook
Solvency ratio: **241%** (with transitional measure)

SOCIAL AND SOCIETAL

- Protection of the greatest number
  12 million people protected
  €13.1 bn in paid claims
  199,000 people trained in life-saving techniques since 2021
- French market presence:
  1st in agriculture insurance (1 farmer out of 2) and municipalities (18,700)
  2nd private individual health insurance provider
  4th in home insurance (3.4 million housing units)
  5th in auto insurance (3.6 million vehicles)
- Contribution to the regions:
  25,000 direct jobs in France
  92% of jobs created remain in the region(*)
  88% of purchases made in the region(*)
- International market presence:
  top 10 in Romania (1st), Hungary (3rd), and Italy (9th)

ENVIRONMENTAL

At Group perimeter: **€6.1 bn** in sustainable investments (as of 31/12/2024)

Carbon Emissions: **-24.7%** in 2024 compared to 2019 for internal operations

Société Forestière Groupama scope: **11 m** tonnes of CO_2 stored

(*) Study IN France (Regional Banks).

To address these issues, the Group adopted in 2022 a Charter defining sustainable investment and establishing the role of ESG in its investment processes. The Charter aims to limit risks and negative impacts by fully integrating environmental concerns, biodiversity loss, and social/societal issues into its investment policy.

The Charter is built around five levers, applied differently depending on asset classes and the specificities of each entity:

1. **ESG analysis and rating of investment sectors and companies.** Investment decisions fully integrate ESG criteria. This is made possible by the ESG ratings of listed assets as well as the due diligence conducted as part of the ESG analysis of the invested funds.
2. **Exclusions.** The Group implements policies to limit exposure to sustainability risks and to eliminate the most harmful investments: Major ESG risks, thermal coal policy, sectoral policy on fossil fuels, and exclusions of the tobacco and unconventional weapons sectors.
3. **Environmental rating filter.** To support the implementation of climate and biodiversity strategies, the Group relies on a proprietary methodology for analyzing risks and opportunities related to natural capital. This filter limits investment in companies poorly positioned regarding environmental transition and favors investment in those well positioned for this transition.
4. **Engagement and dialogue with companies.** The current investment processes include an engagement policy and a voting policy that encourages companies in which Groupama invests to accelerate their transitions, especially environmental ones.
5. **Sustainable investment objective.** The Group promotes investments that generate positive externalities on climate, biodiversity, or social issues.

The first three levers are fully integrated into investment decision-making and restrict the investable universe:

(*)Only for investments made for the euro fund through mandates or dedicated funds managed by Groupama Asset Management.

The Charter applies to all asset classes and covers all Group entities: French and international subsidiaries, and regional mutuals.

Below is a summary table showing how the levers are applied by each asset manager (Groupama Asset Management, Groupama Assurances Mutuelles, or Groupama Immobilier). The assets shown below refer to the scope of the French subsidiaries (mandates and UCITS), excluding regional mutuals and international subsidiaries.

Scope	Delegation of assets entrusted to GMA by the French subsidiaries							
Responsible for implementation	Groupama Asset Management			Groupama Assurances Mutuelles			Groupama Immobilier	
Asset classes	Equity and bond mandates	Equity and bond dedicated funds	Investments in GAM open-ended funds	Infrastructure	Private equity	Private debt	Real estate	Forests
Asset amount (€m) at end-2024, France perimeter and Group vehicles	33,658	7,952	979	1,593	970	679	3,665	272
ESG criteria integration in investment	✓	✓	✓	✓	✓	✓	✓	✓
Fossil fuel policy	✓	✓	GAM's own policies apply	✓	✓	✓	n.a.	n.a.
Sector exclusions: unconventional weapons	✓	✓	✓	✓	✓	✓	n.a.	n.a.
Other sector exclusions: tobacco	✓	✓	✗	✗	✗	✗	n.a.	n.a.
Major ESG risks	✓	✓	GAM's own policies apply	n.a.	n.a.	n.a.	n.a.	n.a.
Environmental rating filter(*)	✓	✓	✗	n.a.	n.a.	n.a.	n.a.	n.a.
Company engagement	✓	✓	✓	n.a.	n.a.	n.a.	✗	n.a.
Sustainable investment	✓	✓	✓	✓	✓	✓	✓	✓

(*)As specified in the dedicated section, the environmental rating filter applies to a limited scope: issuers whose total position held exceeds €25 million within the scope mentioned above and who belong to the 8 sectors identified as the most carbon-intensive.

B. A SPECIFIC ESG ANALYSIS FOR EACH ASSET CLASS

For the euro fund, various ESG analysis frameworks coexist depending on the asset class:

- **For assets invested in listed equities or in private and sovereign bonds,** the ESG analysis developed by GAM is made available to all entities;
- **For assets invested in non-dedicated funds** (i.e., in open-ended listed or unlisted funds), five ESG analysis questionnaires have been implemented, depending on the asset type: listed assets, infrastructure funds, unlisted debt funds (including real estate), corporate private equity, and equity real estate funds;
- **Real estate and forest assets** are assessed using a specific approach developed by Groupama Immobilier, which is detailed in a dedicated section.

Regarding the selection of **unit-linked products** (ULs) for life insurance and retirement savings, Groupama's distribution networks offer funds from various asset managers, including open-ended funds from Groupama Asset Management. The Group applies its responsible investor policy to these ULs through a strict selection process based on a questionnaire sent to management companies. These questionnaires incorporate the main components of the Group's ESG policy and apply to all funds marketed in life insurance and retirement products, including those managed by Groupama AM[3].

[3]The ESG analysis used in unit-linked products (ULs) is that implemented by the respective managers of the UL supports. Apart from that of Groupama Asset Management, these methodologies are not described in the remainder of the document.

1. ESG ANALYSIS FRAMEWORK FOR LISTED ASSETS

All listed investments managed by Groupama Asset Management (GAM) receive an ESG rating. This rating is shared with the various Group entities (regional mutuals, international and French subsidiaries) and made available to investment managers to support their decision-making.

› FOR LISTED EQUITIES AND CORPORATE BONDS MANAGED BY GAM

For listed equities and corporate bonds managed by GAM (excluding sovereign bonds), covering approximately **€29.6 billion** in assets, ESG analysis is conducted directly by GAM.

GAM analysts rely on external data sources (Moody's ESG, Clarity AI, MSCI, and Iceberg Data Lab) to build a quantitative score ranging from 0 to 100, based on key ESG issues defined through sectoral analysis. The methodology integrates a vast majority of mandatory PAIs (Principal Adverse Impacts) indicators, either directly or via equivalent indicators. These PAIs are weighted according to their materiality and relevance for each sector.

GAM's ESG risk and opportunity analysis policy for listed equities and corporate bonds is based on four pillars:

Environmental criteria analyse the positioning and adaptability of companies in the face of the energy and ecological transition, as well as the impacts of company activities on biodiversity protection, waste management, pollution, water management and quality, and the consumption of raw materials.

Human capital criteria assess how a company interacts with all its stakeholders, including customers and suppliers. They also measure the company's contribution to the Sustainable Development Goals and its civic attitude (e.g., taxation, controversies).

Social criteria analyse the management of skills, training, working conditions, and diversity (e.g., % of women in management), based on the best standards in the field.

Governance criteria focus on how the company is managed, administered, and controlled, as well as its relationships with its shareholders, board of directors, and executive management, and the extent to which sustainable development issues are integrated.

The table below outlines how the 16 mandatory PAIs (Principal Adverse Impacts) and 2 optional PAIs are taken into account throughout the investment process—whether through ESG analysis integration, exclusion policies, engagement, or controversy monitoring:

		Consideration of PAIs			
		ESG analysis	Exclusion policy	Controversy monitoring	Engagement policy
PAI 1	Greenhouse gas emissions Scope 1	✓		✓	✓
PAI 1	Greenhouse gas emissions Scope 2	✓		✓	✓
PAI 1	Greenhouse gas emission Scope 3	✓		✓	✓
PAI 1	Total greenhouse gas emissions	✓		✓	✓
PAI 4	Share of investments in companies active in the fossil fuel sector		✓	✓	✓
PAI 5	Share of non-renewable energy consumption compared to total energy production	✓		✓	✓
PAI 6	Average energy consumption intensity of high climate impact sectors	✓		✓	
PAI 7	Biodiversity Activities negatively affecting sensitive areas	✓		✓	✓
PAI 8	Emissions of pollutants into water	✓		✓	
PAI 9	Hazardous waste (tonnes)	✓		✓	
PAI 10	Violations of UN Global Compact and OECD Guidelines by investee companies	✓		✓	✓
PAI 11	Lack of processes to monitor compliance with UN Global Compact and OECD Guidelines by investee companies	✓		✓	✓
PAI 12	Gender pay gap	✓		✓	✓
PAI 13	Board gender diversity	✓		✓	✓
PAI 14	Exposure to controversial weapons		✓	✓	
PAI 15	Carbon footprint	✓			✓
PAI 16	Countries subject to social violations	✓			
PAI 3 Tableau 2	Number of days lost due to injuries, accidents, deaths or illnesses	✓		✓	✓
PAI 3 Tableau 3	Water use and recycling	✓		✓	

› FOR SOVEREIGN BONDS

GAM has developed a dedicated ESG analysis framework for sovereign bond investments. Implemented since October 2022 across 59 countries — both developed and emerging — the methodology aims to capture the potential impact of environmental, social, and political factors on a country's business environment.

Environmental criteria	Social criteria	Governance criteria
Issues related to climate change and biodiversity	Human capital: employment and education, access to basic services	Respect for the rule of law and freedoms
Share of low-carbon energy in energy consumption	Indicators on social cohesion and demographics	Political stability
Fertilizer consumption		Control of corruption
Depletion of natural resources		

› FOR SUSTAINABLE BONDS

Sustainable bonds, whether green, social, or sustainability-linked—are preferred instruments for investors seeking to directly finance environmental or social projects carried out by issuers. This type of debt can be issued by companies, supranational entities, states, or local authorities to fund projects that generate a direct environmental or social benefit.

GAM has developed an internal analysis methodology to ensure that these bonds meet its sustainability standards. This methodology is described in detail below.

In 2024, 83 new instruments were analysed out of a total of 319 green bonds. Among them, 14% were rejected for failing to meet all the requirements outlined in the methodology.

Apart from green bonds, no new issuers or new sustainable/social bond programmes required validation in 2024. All such investments made during the year were part of programmes already approved before 2024.

Sustainable bonds

Characteristics of the issuance

- Compliance with international principles
- Traceability and fund management
- Criteria and governance for the selection and evaluation of projects

Characteristics of the issuer

- Exclusion of high-risk issuers according to Groupama AM
- Assessment of the issuer's ESG policy

Quality of financed projects

- Assessment of the environmental or social benefits of the projects
- Preference for bonds financing projects that go beyond the issuer's existing ESG policy

Transparency

- Ex-ante use of funds
- Second opinion
- Reporting: fund allocation and impact indicators
- Audit

2. ESG ANALYSIS FRAMEWORK FOR INVESTMENTS OUTSIDE OF MANDATES AND DEDICATED FUNDS

A common and standardized ESG due diligence process has been designed and implemented since June 2022 for both the Group and Groupama Gan Vie. It includes the systematic submission of a questionnaire whenever a new investment or fund reference is being considered—whether for listed or unlisted assets, including those managed by Groupama Asset Management.

This process involves **asset-specific questionnaires** for: Listed securities, Infrastructure funds, Private debt funds (including real estate debt), Corporate private equity, Real estate equity funds. These questionnaires are shared with all Group entities.

They cover four core themes:

1. **The asset manager's ESG policy;**
2. **Governance and risk management;**
3. **Fund-level ESG policy (ESG maturity, engagement, exclusions);**
4. **Reporting tools and data.**

In addition to these common themes, a specific section addresses **engagement and shareholder dialogue issues** for listed asset funds. The reporting tools and data section focuses on the asset manager's ability to disclose information such as the proportion of green assets, an ESG climate report, the existence of an alignment trajectory with the Paris Agreement targets, or the production of PAI indicators.

Since 2022, ESG analysis tools for fund selection have been strengthened. The fund selection questionnaires have been expanded and restructured around quantitative criteria, with a view to industrializing and systematizing the process. Since 2023, all newly selected funds have been systematically analysed using these updated questionnaires. In 2024, the framework was further enhanced by adding a specific question on exclusion policies related to unconventional weapons.

C. LIMITING EXPOSURE TO SUSTAINABILITY RISKS: EXCLUSIONS

All the policies outlined below apply to new direct investments or those made through mandates and mutual funds (UCITS) in listed equities and bonds managed by GAM. The Group's exposure to the sectors targeted by these policies is decreasing, or already non-existent for some. This exposure is also monitored as part of the risk management framework described in Section VIII of this report.

THE CLIMATE IMPACT OF FOSSIL FUELS: A CLEAR SCIENTIFIC CONSENSUS

The combustion of fossil fuels—coal, oil, and gas—is the leading global source of greenhouse gas (GHG) emissions, which are responsible for climate disruption. This fact is now firmly established by scientific consensus, notably in the work of the IPCC. Emissions from these energy sources contribute to the acceleration of global warming and the multiplication of its impacts: rising sea levels, extreme weather events, and biodiversity loss.

The Paris Agreement aims to limit global warming to well below 2°C, and preferably to 1.5°C, compared to pre-industrial levels. Achieving this goal requires a rapid and significant reduction in the use of fossil fuels. This means not only reducing the consumption of coal, oil, and gas, but also halting investments in new exploration or development projects.

The International Energy Agency (IEA) stated in its "Net Zero by 2050" roadmap: "No new fossil fuel projects can be developed if we are to reach global carbon neutrality by 2050".

The IEA further specifies that:

- Producers should allocate 50% of their investment spending to clean energy by 2030;
- Oil and gas consumption should decline by over 75% by that time, and in this scenario, "the drop in demand is strong enough that no new long-term conventional oil or gas projects are needed".

The IEA's Net Zero Emissions (NZE) scenario—its most ambitious—calls for an immediate halt to new oil and gas projects, along with the gradual reduction of oil and gas production.

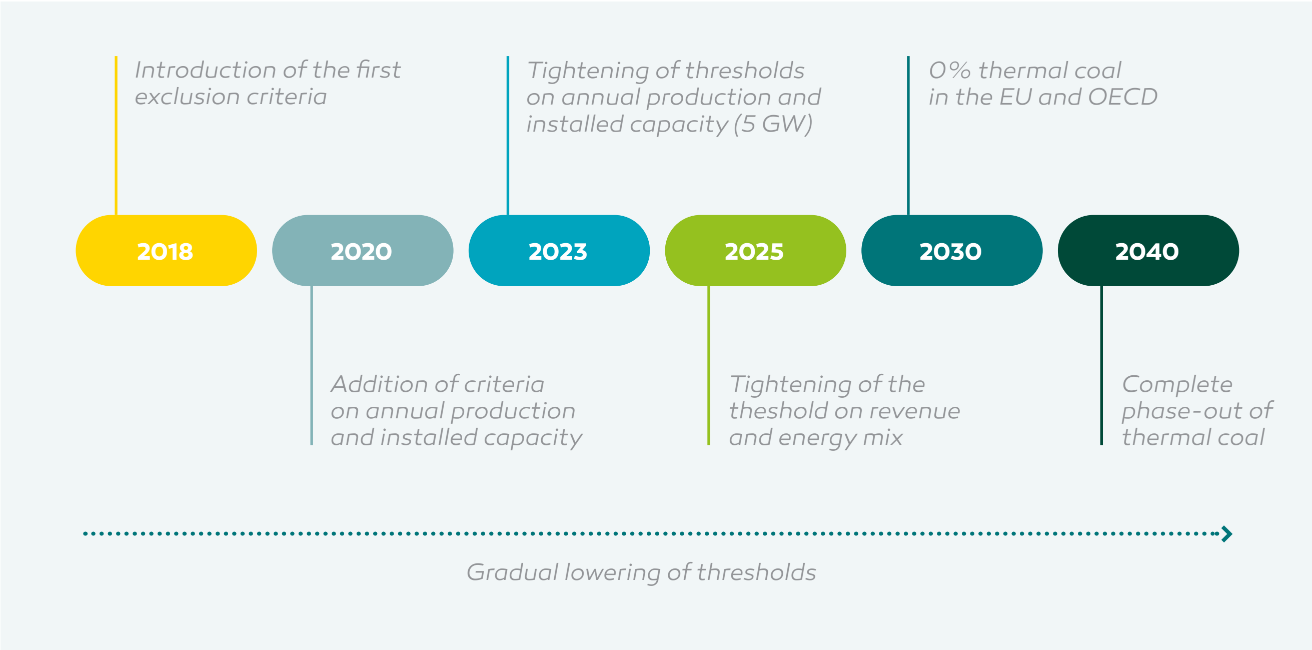
It should be noted that not all fossil fuels have the same impact.

Coal, which is widely used for electricity generation, is the most CO_2-intensive fossil fuel. In response to this significant impact, many financial institutions have adopted specific policies for phasing out thermal coal.

Fossil fuels are categorized into conventional sources—from deposits that are easily exploitable—and unconventional sources, which require more complex and environmentally damaging techniques (e.g., oil sands, shale oil, Arctic drilling, etc.). The latter are generally more greenhouse gas-intensive and more destructive in terms of biodiversity and local pollution.

1. THERMAL COAL POLICY

Groupama's coal policy, launched in 2018, establishes a complete exit from companies involved in thermal coal no later than 2030 for European Union and OECD countries, and by 2040 for the rest of the world.



This policy applies to the **entire value chain of thermal coal**, including companies developing new projects in this sector.

It takes the form of a progressive disengagement, reinforced in 2023 and again as of July 1, 2025, from any company that meets one or more of the following criteria:

2025 update:

- Generates more than **10% of its revenue or energy mix** from thermal coal, down from 20%.

2023 update:

- Produces more than **10 Mt of coal per year**, down from 20 Mt;
- Operates coal-fired power plants with a total installed capacity exceeding **5 GW**, down from 10 GW.

Groupama relies on data from Urgewald's Global Coal Exit List (GCEL) and analyses conducted by Groupama Asset Management (GAM) to identify relevant companies[4]. The analysis by GAM may lead to conclusions that differ from a strict application of Urgewald's criteria. In such cases, a detailed review of the company's coal exit strategy is conducted, an engagement process is launched, and the strategy is reassessed at least annually.

For its investments in non-dedicated funds, Groupama uses its ESG questionnaire to verify that third-party asset managers have a thermal coal policy, and that this policy is consistent with the Group's commitments, particularly the requirement for a full exit from thermal coal by 2030.

[4]The Group's exposure to coal is specified in the "Brown share" section of this report.

2. OIL AND GAS POLICY – CONVENTIONAL AND UNCONVENTIONAL FOSSIL FUELS

Aware of the vital role played by the oil and gas sector and in line with the recommendations of the International Energy Agency (IEA) scenarios, **Groupama has implemented a policy on unconventional fossil fuels (UFF) since 2022 and a policy on conventional fossil fuels since 2024.**

Groupama has committed to no longer financing, in its mandates or dedicated funds managed by GAM, companies involved in the development of new **conventional and unconventional** oil and gas projects. This rule does not apply to financing needs specifically earmarked for projects that support the transition, i.e. green bonds validated by GAM's internal teams.

Groupama uses data from Urgewald's Global Oil and Gas Exit List (GOGEL) and GAM's analyses to identify the companies concerned[5]. GAM's analysis may lead to conclusions that differ from the strict application of Urgewald data. In this case, a detailed analysis of the company's exit strategy from unconventional oil or gas is carried out, engagement action is initiated and the company's strategy is reviewed at least annually.

[5]The Group's exposure to conventional and unconventional fossil fuels is specified in the "Brown share" section of this report.

3. MAJOR ESG RISKS

For all investments made directly or through mandates and dedicated UCITS, or through investments in Article 8 or 9 SFDR open-ended funds managed by GAM, ESG controversies are monitored more broadly using the list of Major ESG Risks, which is compiled and updated by GAM.

This list includes companies for which ESG risks could jeopardise economic and financial viability, have a significant impact on the value of the company and therefore lead to a significant loss in market value or a significant downgrade in agency ratings.

Each time a new entry is added to the list of Major ESG Risks, the conditions under which it could be removed from the list are determined. These conditions are systematically reviewed every six months.

The list of Major ESG Risks classifies companies into two groups:

1. **High level of controversy** according to data provider Moody's ESG and validated by GAM's internal analysis;
2. **Governance considered deficient** by GAM analysts.

In the Group's management mandates and dedicated UCITS, reinvestment or investment in companies on the Major ESG Risks list is prohibited, with the aim of divesting the portfolio as soon as possible.

For investments in non-dedicated UCITS, Groupama uses its ESG questionnaire to ensure that controversies within the funds invested are monitored.

4. OTHER SECTOR EXCLUSIONS

For all its investments held directly or through mandates and dedicated mutual funds managed by GAM, Groupama excludes from its investment portfolios sectors considered to pose unacceptable environmental and social risks, namely:

- **Tobacco**, with Groupama excluding any new investments in tobacco companies since 2024. As at 31/12/2024, its residual exposure was €46.7 million;
- **Non-conventional weapons** are completely excluded from the portfolios.

The policy on non-conventional weapons covers the production, storage, distribution and marketing of the following weapons:

- **Cluster munitions** (CM) as defined by the 2008 Oslo Treaty;
- **Anti-personnel mines** (APMs) as defined by the 1997 Ottawa Convention;
- **Depleted uranium weapons** banned by certain national laws, notably Belgian law (the Mahoux Law, adopted in 2007);
- **Chemical weapons** as defined by the 1993 Chemical Weapons Convention;
- **Biological weapons** as defined by the 1972 Biological Weapons Convention;
- **Incendiary weapons** or weapons using white phosphorus;
- **Nuclear weapons** outside the scope of the 1968 Non-Proliferation Treaty.

For its investments in mutual funds not dedicated to or managed by GAM, Groupama uses its ESG questionnaire to ensure that an exclusion policy on unconventional weapons is in place within the funds invested.

In 2009, exclusion of:

Cluster munitions (CM)
Anti-personnel mines (APMs)
Depleted uranium weapons

In 2023, addition of:

Chemical weapons
Biological weapons
Incendiary weapons or weapons using white phosphorus
Nuclear weapons outside the scope of the 1968 Non-Proliferation Treaty

All exclusions applied as of December 31, 2024, are summarized in the table below, with the exception of the thresholds on revenue and thermal coal energy production mix which will apply as of July 1, 2025:

Scope	**All Groupama investments held directly or via mandates (excluding sovereign bonds and derivatives) and dedicated funds managed by GAM**			
Application Scope	**All exclusions presented in the table below apply to new investments (flows) from the date the exclusion is taken into account by the Group**			
Theme	**Sector**	**KPIs**	**Thresholds**	**Data source**
Thermal coal	**Extraction, production, transport and processing**	Revenue	More than 10%	Global Coal Exit List (GCEL) Urgewald (public list)
		Energy production mix	More than 10%	
		Annual coal production	10 million tonnes	
		Installed capacity of coal-fired plants	5 GW	
		Development of new projects	Companies developing new thermal coal projects	
Unconventional fossil fuels (oil and gas extracted through hydraulic fracturing, coalbed methane, oil sands, extra-heavy oil, ultra-deep offshore oil and gas, fossil fuel resources in the Arctic)	**Exploration, production, transport and storage**	Development of new projects	Companies developing new unconventional fossil fuel projects	Global Oil and Gas Exit List (GOGEL) Urgewald (public list)
Fossil Fuels	**Exploration, production, transport and storage**	Development of new projects	Companies developing new fossil fuel projects	Global Oil and Gas Exit List (GOGEL) Urgewald (public list)
Tobacco	**Production**	Revenue	Above 0%	Moody's
Unconventional weapons (cluster munitions, anti-personnel mines, depleted uranium, chemical, biological, incendiary, white phosphorus, and nuclear weapons)	**Production, storage, distribution and marketing**	Revenue from weapons banned under international conventions and/or considered unconventional	Flagged companies deemed non-compliant	ISS Ethix

D. ENVIRONMENTAL RATING FILTER: A PROPRIETARY METHODOLOGY FOR ASSESSING ENVIRONMENTAL IMPACT

To support the implementation of the Group's climate and biodiversity strategies, GAM has developed and strengthened a methodology for analysing risks and opportunities related to natural capital since 2017. It applies to companies in the 8 sectors[6] most exposed to environmental issues. An overall rating is assigned to each company covered by the analysis. This rating results in a classification into three categories.

Environmental rating filter

Scope	• Companies from one of the 8 sectors most exposed to environmental issues • Investments over €25 million through mandates and dedicated funds managed by GAM
Based on 3 indicators	**1. NEC:** the company's net impact on the environment **2. Carbon intensity:** scopes 1 and 2 emissions related to the company's activities **3. Alignment with the Paris Agreement:** the company's implied warming trajectory

Category 1	Category 2	Category 3
Issuers favorably positionned in terms of environmental transition. ⌄ Managers may choose to maintain or increase their position.	Issuers with positionning or implementation of climate and biodiversity policies that are unconvincing in terms of consistency between goals and means, or in terms of momentum. ⌄ Managers place these issuers “under watch”, meaning the position can be maintained but not increased.	Issuers whose positionning hinders the environmental transition. ⌄ Managers may not reinvest and must gradually divest from the position. These are typically portfolio positions held for arbitrage operations. There is no predefined divestment deadline.

This analysis is based on three complementary indicators:

1. **The NEC** (Net Environmental Contribution): This indicator, calculated by the data provider Iceberg Data Lab, assesses economic activities (products and services) according to their impact on the environment, i.e. on climate, biodiversity and resources, throughout their entire life cycle. Companies are rated on a scale from -100% to +100%, with 0% corresponding to the average global environmental footprint;

2. **Carbon intensity:** Measured in tCO_2/€m turnover, carbon intensity measures the amount of greenhouse gases (GHGs) required to generate one million euros in turnover. This carbon intensity is measured on scopes 1 and 2;

3. **Alignment with the Paris Agreement:** This indicator assesses the alignment of companies' climate strategies with the Paris Agreement's goal of keeping global warming below 1.5°C, measured using MSCI's Implied Temperature Rise (ITR) methodology.

These companies represent **€11.1 billion**, or **17%** of the Group's assets under management excluding UC, and **92** are classified in one of these three categories.

[6] Oil and Gas; Materials; Capital Goods; Transport; Agriculture/Food Industry; Automotive; Utilities; Real Estate

The sector breakdown by number of issuers for all companies analysed using the environmental rating filter is as follows:

Sector	Weight
Automotive	16%
Capital goods	16%
Oil & gas	5%
Agriculture / Agrifood	17%
Materials	11%
Real estate	12%
Transport	5%
Utilities	18%

ITR (IMPLIED TEMPERATURE RISE) INDICATOR METHODOLOGY

The Group uses the ITR indicator developed by MSCI, which aims to measure the compatibility of a company's emissions trajectories with a scenario aligned with limiting global warming to 1.5°C by 2100 and the goal of carbon neutrality by 2050.

The main steps in calculating the ITR are as follows:

1. **Allocation of a carbon budget**
    - MSCI uses NGFS scenarios (the REMIND Net Zero 2050 scenario) to define sectoral and regional carbon budgets.
    - Each company is allocated a carbon budget based on its current emissions (scopes 1, 2 and 3), its revenue by sector and region, and the associated decarbonisation potential. This budget is expressed in carbon intensity and then converted into absolute emissions.
2. **Projection of future emissions**
    - Emissions are projected until 2050, incorporating the climate targets announced by the company.
    - An adjustment factor assesses the credibility of the commitments: the less credible a target is deemed to be, the more the emissions projections are penalised.
3. **Compliance with the carbon budget**

- Projected emissions are compared to the available carbon budget, identifying any overspending or underutilisation of the budget.

4. **Conversion to temperature**
    - Finally, this level is extrapolated to the global scale using the IPCC's[7] TCRE (Transient Climate Response to Cumulative CO_2 Emissions) factor, as follows $\Delta T = (\text{Relative global overshoot}) \times (\text{Global 1.5°C carbon budget}) \times \text{TCRE}$
    - The result provides an implicit temperature (e.g. 2.5°C) indicating the projected global warming if the entire economy followed the same trajectory as the entity analysed.

[7]IPCC: Intergovernmental Panel on Climate Change.

E. INVESTMENT IN SUSTAINABLE ACTIVITIES

Through its sustainable investment program, the Group is committed to financing activities that have a positive environmental or social impact.

The sustainable investment portfolio stood at €6.1 billion at the end of 2024. An initial target of €1.2 billion in additional investment over a three-year period between 2022 and 2024 was achieved a year ahead of schedule at the end of 2023, and it was decided to renew the program with a similar target of €1.2 billion in additional investment over a four-year period between 2024 and 2027.

As part of the Group's "Ambition 2030" strategic program and NAZAO commitments, the Group is working to redefine a sustainable investment target for 2030.

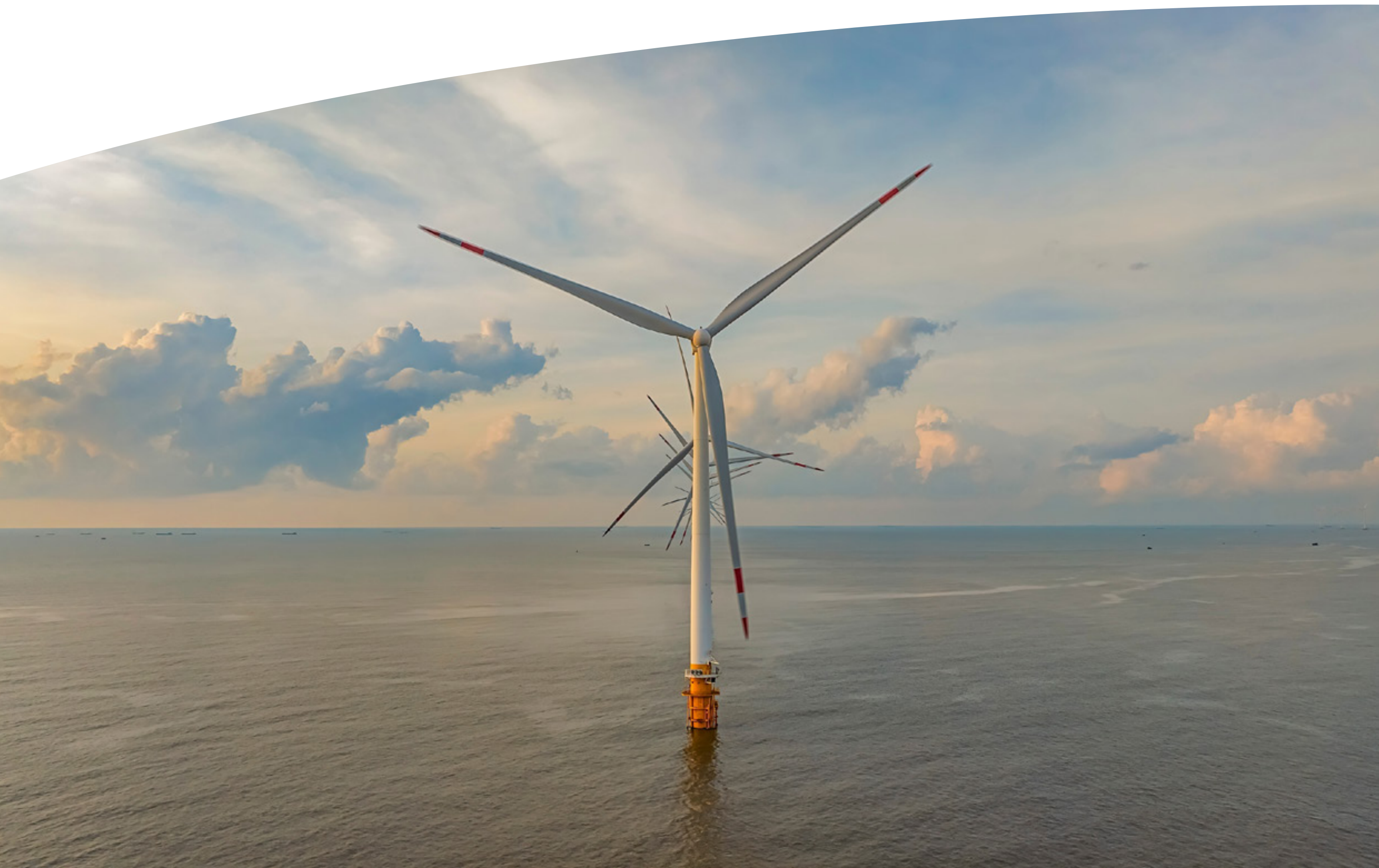
To identify the scope of investments eligible for this program, the Group has worked on a classification of assets that it considers sustainable, based on its internal levers and tools. Without being subject to the SFDR regulation, and without seeking to meet all of its requirements, the Group has sought to align itself with the philosophy of what this regulation calls sustainable investment.

The Group's subsidiaries subject to the SFDR have defined their own regulatory approach to sustainable investment. They base their actions on their own definition of sustainable investment under the SFDR and by contributing to investments in sustainable activities according to the Group's institutional definition described here.

This classification is intended to be operational, with the aim of guiding Groupama towards activities that make a positive ESG contribution, whether from an environmental or social perspective. For example, activities dedicated to limiting the effects of climate change, such as the low-carbon infrastructure described in section VI of the report, fall within this classification.

To identify investments that correspond to this classification, investments made in all Group entities are analysed, provided they meet the classification described below.

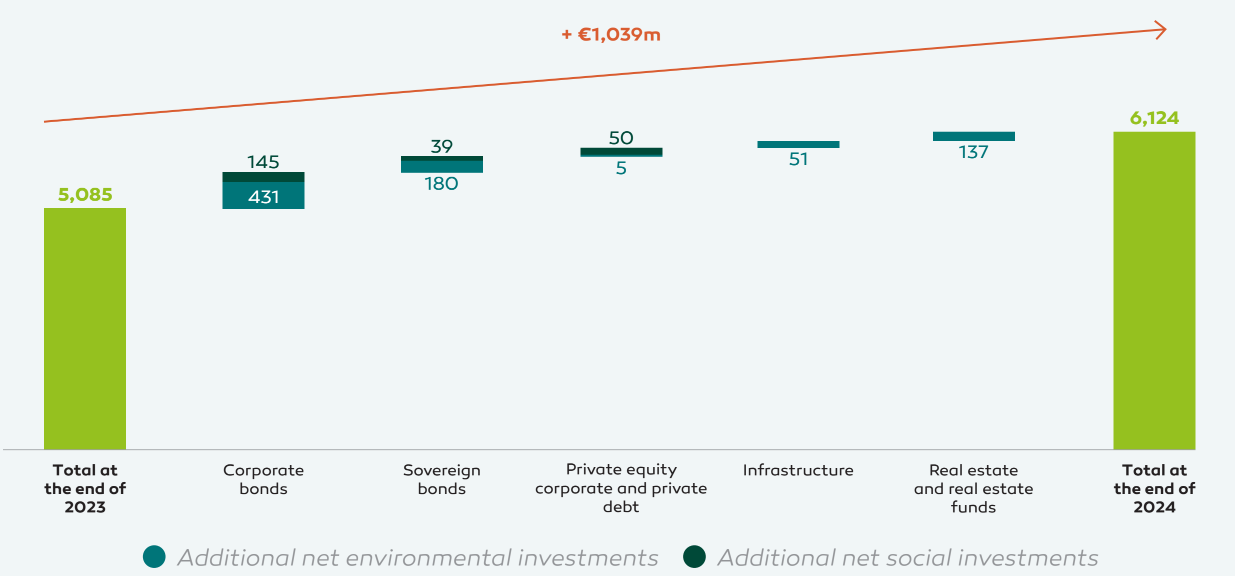
This year saw a marked continuation of sustainable investments, with the Group mobilising additional €1,039m in sustainable investments in 2024.



Criteria by asset class for the implementation of the sustainable investment program

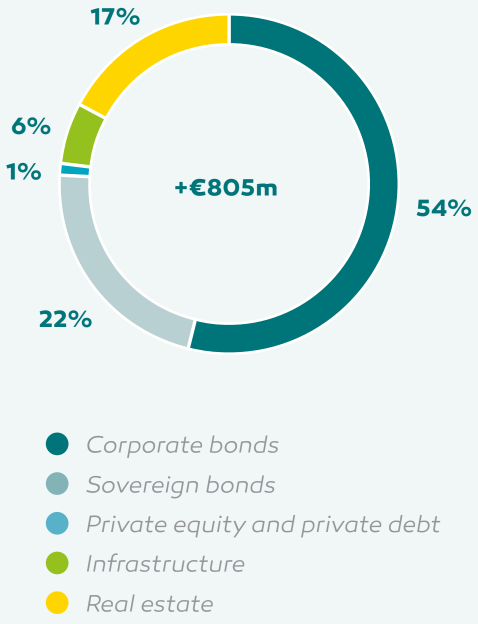
	Environmental investments	Social investments	Additional net investments during the year			Total investments as of 31/12/2024		
			E	S	Total	E	S	Total
Equities	Strategic holdings aligned with the EU taxonomy	Subject to specific analysis	0	0	**0**	148	0	**148**
Corporate bonds	Green Bonds aligned with Green Bond Principles or the European Green Bond Standard validated by GAM's methodology	Social Bonds aligned with the Social Bond Principles validated by the GAM methodology	431	145	**576**	1,361	262	**1,622**
Sovereign bonds	Green Bonds aligned with Green Bond Principle	Social Bonds aligned with the Social Bond Principles	180	40	**220**	1,335	143	**1,479**
Private equity corporate and private debt	Environmentally focused assets within Article 9 funds	Social asset belonging to an Article 9 fund	5	50	**55**	13	106	**119**
Infrastructure	Environmentally focused infrastructure aligned with eligible taxonomy sectors (non-technical criteria)	Subject to specific analysis	51	0	**51**	543	0	**543**
Real estate	Assets labelled or certified from an environmental or energy perspective Projects aligned with the European taxonomy	Subject to specific analysis	137	0	**137**	2,209	0	**2,209**
Real estate funds	Article 9 real estate funds	Subject to specific analysis	0	0	**0**	0	4	**4**
Total (in €m)			**805**	**234**	**1,039**	**5,609**	**515**	**6,124**

Evolution of sustainable investments in 2024 (in €m)

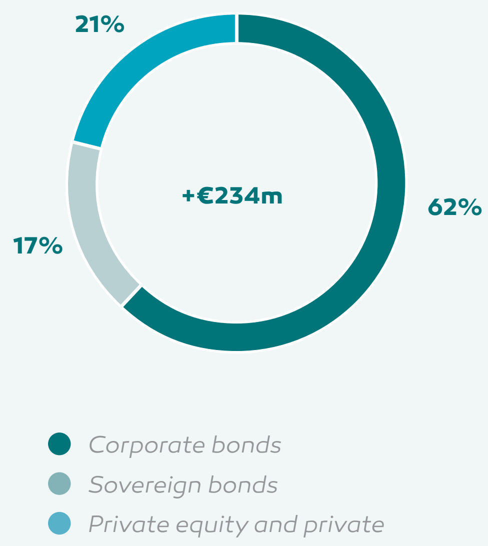


The graphs below show the distribution of environmental and social flows for the year 2024:

Additional environmental investments during 2024



Additional social investments during 2024



EXAMPLE OF INVESTMENT IN A GREEN BOND ISSUED BY SAINT GOBAIN

As part of its sustainable investment strategy, the Group has invested in a green bond issued by Saint-Gobain in April 2024.

The funds raised are allocated to two main categories of projects:

- Energy efficiency, by supporting the production of materials designed to improve the thermal insulation of buildings (e.g. high-performance insulation, windows and exterior wall systems with low thermal transmittance coefficients);
- Low-carbon technologies, by financing the development of products that enable substantial reductions in greenhouse gas emissions throughout their life cycle, verified by a third party.

These projects contribute directly to the energy transition and are aligned with the European taxonomy.

EXAMPLE OF GROUPAMA SOCIAL IMPACT DEBT (GSID) FUND

Since 2022, Groupama Asset Management has been managing the Groupama Social Impact Debt (GSID) fund, a private debt fund classified as Article 9 SFDR. As at 31 December 2024, €182.4 million had been raised out of a target of €200 million, two-thirds of which was committed by Group entities.

The fund aims to generate a positive social impact by financing local SMEs committed to human capital development. It provides direct support to entrepreneurs through loans of between €5 million and €20 million, targeting financially sound companies that are ready to improve their social performance.

The impact is assessed using indicators such as the conversion of temporary contracts into permanent contracts.

F. ESG INTEGRATION IN PROPERTY MANAGEMENT

1. GROUPAMA, OWNER OF A SUSTAINABLE PROPERTY PORTFOLIO MANAGED BY GROUPAMA IMMOBILIER

The construction sector has a major role to play in limiting global warming to 1.5°C by the end of the century, in accordance with the Paris Agreement. It is the **second largest emitter of greenhouse gases** (GHGs) in France, accounting for nearly **30% of emissions**. In this context, and as part of the Group's participation in the NZAOA[8] , the integration of ESG into Groupama's property management is primarily focused on addressing climate issues.

› A VIRTUOUS ACQUISITION STRATEGY

In a real estate cycle structured around three main stages – acquisition, operation and disposal – the integration of ESG issues from the outset ensures the consistency and sustainable performance of the asset throughout its life cycle.

As a responsible asset manager, Groupama Immobilier carries out a **preliminary audit** as part of its due diligence process for any investment opportunity.

Assets are thus evaluated using an **ESG grid**, the results of which are taken into account in investment decisions and then used by asset managers once the assets are in operation.

In particular, it assesses:

- The possibility of improving the environmental performance of the assets;
- Eco-responsible construction methods;
- The levels of certification obtained;

Social characteristics are also taken into account, such as:

- The proximity of the building to public transport;
- Or the ability to accommodate people with reduced mobility.

[8] *Net Zero Asset Owner Alliance.*

The building sector has a major role to play in limiting global warming to 1.5°C by the end of the century, in accordance with the Paris Agreement.

THE NATIONAL LOW CARBON STRATEGY (NLCS)

In France, the trajectory for reducing emissions by 2050 is set by the **National Low Carbon Strategy** (NLCS). It aims to achieve a 49% reduction in greenhouse gas emissions in the building sector by 2030 compared to 2015 and complete decarbonisation by 2050.

The tertiary decree is one of the ways this is being implemented for real estate assets. It requires all tertiary assets with a surface area greater than or equal to 1,000 m² to reduce their energy consumption by 2030, 2040 and 2050 by reaching thresholds in absolute or relative terms.

2025 IMPROVEMENT PLAN

This ESG grid is currently being redesigned with the aim of producing a new tool for managing ESG efficiency and sharing ESG analysis by the end of 2025.

Comprising around 30 indicators and integrated into business applications, it will be based on regularly updated technical and environmental data and will apply to all tertiary real estate assets, regardless of their type.

› AN AMBITIOUS MANAGEMENT POLICY

To align with trajectories consistent with the Paris Agreement, Groupama Immobilier is implementing an action plan, the main measures of which include:

- **Consumption data collection:** the deployment of the **Deepki** platform since 2017 has made it possible to automate the reporting of actual energy consumption in buildings. By the end of 2024, **91% of assets, in terms of value, subject to the tertiary decree were registered in Deepki**. When incomplete, energy data is supplemented using Deepki's modelling algorithms.
- **Energy audits:** energy audits have been carried out on 18% of the portfolio. Regular discussions take place with occupants, particularly during Green Committee meetings on environmental issues.
- **Renovations**: all major renovations are subject to **BBCA certification** (low-carbon building) and a reuse policy. This concerns operations launched in 2024 and beyond, with a total of around ten assets targeted in 2025.
- **Reuse**: by participating in the creation of **Circolab** and the **Booster du Réemploi**, Groupama Immobilier has been at the forefront of reuse in real estate. The reuse approach is currently being systematised and will soon cover an initial series of materials and equipment selected on the basis of various criteria such as carbon savings, the maturity of the sector, acceptability by tenants and insurability.
- **Regulatory levers:** Groupama Immobilier naturally complies with regulatory obligations such as the EET and BACS decrees, which set the course for improving the energy efficiency of assets in operation.
- **Energy and resource use:** in 2024, the use of electricity produced exclusively from 100% renewable energy sources to power the common areas of the real estate assets under management was renewed. The use of low-carbon materials is also an essential lever for reducing the embedded carbon of assets, with the use of natural insulation materials becoming more widespread.

THE BBCA LABEL

The **BBCA label** promotes best low-carbon practices during the operational phase of buildings. It goes beyond energy considerations alone by taking into account the building's overall carbon footprint, including the impact of materials, fittings and usage.

2025 IMPROVEMENT PLAN

To improve performance monitoring, in autumn 2024 Groupama Immobilier launched a project to strengthen its energy management system with a view to having improved functionality by the end of 2025 for **monitoring the energy performance of its assets** and tracking the actions taken for each asset.

At the same time, Groupama Immobilier is expanding the scope of actual consumption recovery by obtaining more data collection mandates from tenants. The improvement in the performance of each asset is based on multi-year action plans.

2. GROUPAMA, ONE OF THE LEADING ASSET OWNER OF FOREST IN FRANCE

Société Forestière Groupama (SFG), a wholly owned subsidiary of Groupama Immobilier, **manages nearly 23,000 hectares of forest** owned by the Group, consisting of 28 forests under management mandate. This makes it one of the largest institutional forest managers in France.

Spread across the entire French mainland, these forests are made up of approximately two-thirds conifers and one-third broadleaves. Their annual harvest yields around **100,000 m³ of wood**, which supplies the French timber, industrial wood, and firewood sectors. To ensure the sustainability of this resource, over **13 million trees** have been planted over the past 20 years.

Forest asset management at Groupama is not limited to timber sales, nor is the forest environment viewed solely in terms of tree growth. To ensure long-term, dynamic profitability, Groupama Immobilier follows a **"multifunctionality" approach**, recognizing that forests provide essential services to society.

These services include, for example: job creation in rural areas and across the forestry value chain, carbon sequestration and storage, water resource management, habitats for a rich and diverse range of flora and fauna, preservation and enhancement of historic forest heritage with prestigious, storied pasts.

Groupama Immobilier's forest management policy thus aims to enhance these assets while taking into account climate and biodiversity issues.

All forests under management are PEFC certified (Programmeme for the Endorsement of Forest Certification), a recognized environmental quality label.

THE PEFC LABEL

The PEFC (Programme for the Endorsement of Forest Certification) is a globally recognized label that identifies materials sourced from sustainably managed forests, in accordance with strict environmental, social, and economic standards.

G. SUMMARY TABLE OF ESG OBJECTIVES, MECHANISMS AND MEASURES

Scope	Measure	Criteria	Amount (€m)	Share excl. unit-linked	Share incl. unit-linked	Comments
Objectives	50% reduction in carbon intensity (Scopes 1 and 2)	E	30,810	46%	37%	Applies to corporate equities and bonds at Group level, excluding unit-linked, where ESG data is available.
	€1.2bn in sustainable investments between 2024 and 2027	E-S	49,115	74%	59%	Groupama's sustainable investment concept is based on an internal institutional definition including eligible assets invested directly and excluding unit-linked. Mainly includes bonds, strategic holdings, real estate and unlisted assets.
Operational measure	ESG coverage	E-S-G	58,979	89%	N.D.	ESG analysis covers all listed assets with ESG data and investments from Groupama Immobilier, French subsidiaries and unlisted funds with ESG due diligence, as well as Group vehicles.
	List of Major ESG risks	E-S-G	32,364	49%	39%	Applies to corporate equities and bonds managed by GAM through an Article 8 or 9 SFDR vehicle, excluding unit-linked.
	Fossil fuel exclusion (coal, conventional and unconventional oil and gas)	E	29,570	45%	36%	Applies to corporate equities and bonds managed by GAM at Group level, excluding unit-linked.
	Environmental rating filter	E	11,113	71%	13%	Applies to all assets held via mandates and dedicated funds managed by GAM, for issuers in the 8 most carbon-intensive sectors and with over €25m exposure at Group level.
	Investor engagement policy	E-S-G	29,570	45%	36%	Applies to corporate equities and bonds managed by GAM at Group level, excluding unit-linked.
	Voting policy	E-S-G	2,633	4%	3%	Voting policy is delegated to GAM for the equities managed by GAM.
Measures *(Performance and risk)*	Environmental performance indicators for corporate equities and bonds	E	30,810	46%	37%	Monitoring applies to corporate equities and bonds at Group level, excluding unit-linked, where ESG data is available.
	Environmental performance indicators for sovereign issuers	E	24,748	37%	30%	Monitoring applies to sovereign bonds at Group level, excluding unit-linked.
	EU Taxonomy for reported data	E	58,159	n.a.	74%	Covers all assets incl. unit-linked except sovereign bonds, central/local gov., central banks or supranationals. Percentage expressed as share of balance sheet incl. unit-linked.
	Brown share	E	30,810	46%	37%	Monitoring applies to corporate equities and bonds at Group level, excluding unit-linked, where ESG data is available.
	Biodiversity impact and dependency assessment	E	30,810	46%	37%	Applies to corporate equities and bonds at Group level, excluding unit-linked, where ESG data is available.
	Transition risk assessment of corporate bonds	E	17,957	46%	37%	Applies to corporate bonds of GGVie, excluding unit-linked. This scope represents 43% of GGVie's non-unit-linked portfolio.
	Physical climate risk assessment – real estate	E	3,938	6%	5%	Applies to Groupama Immobilier's assets managed for the Group and covered by BatAdapt.

H. INDUSTRY-WIDE COMMITMENTS TO SUSTAINABLE FINANCE

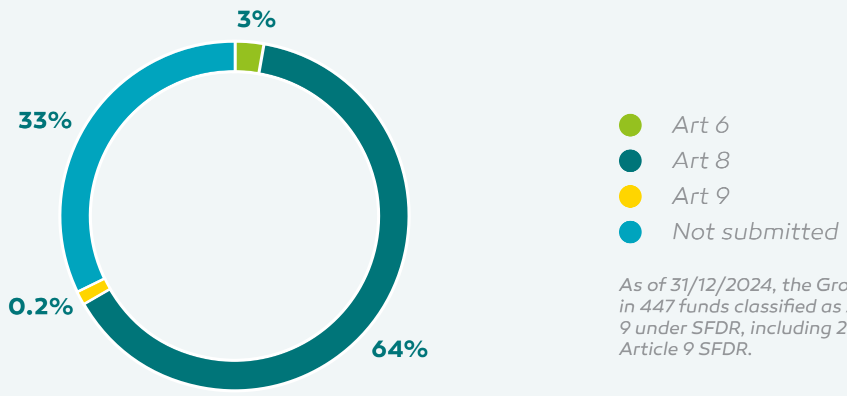
In the context of the growing development of responsible finance, Groupama takes part in industry-wide initiatives. For the Group, this involvement serves three main purposes: **to help** initiate a collective momentum, **to develop** internal expertise, and **to promote** the creation of an institutional framework that supports the deployment of Sustainable Finance.

Entities	Initiatives supported by Groupama	Groupama's role in these initiatives	Operational impact
Groupama Assurances Mutuelles	**Association des Assureurs Mutualistes**	Chairmanship of the Association held by Thierry Martel, CEO of Groupama. Participation in the Climate Finance Working Group.	Professional associations act as key channels of information (both top-down and bottom-up) between the Group and insurers as well as regulators and public authorities, both French and European. They enable Groupama to promote its demanding ESG approach, especially in interactions with supervisory authorities and in joint responses to regulatory consultations.
	France Assureurs *(FA)*	Participation in dedicated working groups of France Assureurs (Climate ESG, Sustainable Development, Extra-financial Standards, Climate Risks, Biodiversity).	
	Autorité de Contrôle Prudentiel et de Résolution *(ACPR)*	Participation in the Climate Risk Working Group.	Groupama contributes to various pilot exercises and to the ACPR/AMF reports monitoring and evaluating climate commitments by financial actors. These pilots served as a starting point for ongoing work on quantifying financial impacts.
	Net-Zero Asset Owner Alliance *(NZAOA)*	Signatory of the NZAOA since 2022.	The Group enhances transparency by publicly reporting its commitments annually. Groupama also publishes its commitments on the sustainable finance observatory website. The various working groups also provide valuable information and insights, which are fully integrated into Groupama's sustainable investment strategy roadmap.
	Principles for Responsible Investment *(PRI)*	Signatory of the PRI since 2022.	
	Observatoire de l'Immobilier Durable *(OID)*	Member of the OID since 2023.	Groupama participates in the Governance and Resilient Society and Territories working groups of OID and uses the Bat-ADAPT climate risk analysis tool (R4RE platform): a decision-support tool for climate adaptation of buildings and physical risk assessment.

I. PROPORTION OF ASSETS HELD THAT ARE MANAGED USING ESG CRITERIA

The figure below shows the distribution of the Group's assets, excluding unit-linked products, according to the SFDR classification as of 31/12/2024. In accordance with the recommendation of the **French Prudential Supervision and Resolution Authority** (ACPR), the **GGVie euro fund**, which qualifies under **Article 8** of the regulation, is included in the figures presented below.

Breakdown of the Group's assets according to the SFDR classification as at 31/12/2024



As of 31/12/2024, the Group was invested in 447 funds classified as Article 8 or Article 9 under SFDR, including 29 classified as Article 9 SFDR.

Over the course of the 2024 financial year, the change in the number of funds by SFDR classification was as follows:

SFDR classification	Change in number of funds
Article 9	+4
Article 8	+111
Article 6	-82
Not submitted	n.a.

The decrease in the number of funds classified as Article 6 under the SFDR classification is explained by an increase in the number of funds compared to 2023, particularly those classified as Article 8 (+111 funds).

II. INTERNAL RESOURCES DEPLOYED BY GROUPAMA

A. FINANCIAL, HUMAN AND TECHNICAL RESOURCES

Groupama deploys substantial resources to equip itself with the means necessary to implement its sustainable investment strategy.

As of **December 31, 2024, 36 full-time equivalents** (FTEs) were assigned to sustainability-related topics within various entities of the Group. These staff include both employees working specifically on responsible investment (such as ESG analysts), and others focused on CSR-related matters (e.g., the sustainability team) or involved in the development and marketing of sustainable investment products (such as life or retirement solutions).

The methodology for calculating this figure will be refined in future reports to include only FTEs directly involved in responsible investment. In addition, **Groupama allocates €1.5 million** to ESG, including **€818,800 dedicated to ESG data**.

The technical resources used by Groupama—such as the data quality control system—are described throughout the report.

THE ESG DATA FLOW WITHIN THE GROUP AND ITS CONTROL

ESG data are purchased from data providers through a Group-wide contract and is first transmitted to Groupama Asset Management (GAM). GAM integrates this data into its internal systems in order to: control the quality of the data, calculate the proprietary ESG rating, and associate ESG scores and indicators with individual issuers.

All of this information is then transmitted to the various entities of the Group via the DOFI (Financial Operations and Investment Department). These controls are conducted on a quarterly basis, in line with each ESG data update.

Three types of controls are systematically performed on all ESG data shared within the Group:

1. **Integrity and format consistency of the data;**
2. **Change control, especially for extreme variations in values;**
3. **Accuracy control of the reported units.**

B. STRENGTHENING INTERNAL EXPERTISE

To promote a shared culture around sustainability issues, Groupama launched in 2022 a comprehensive **"CSR Engagement Plan"** aimed at all its employees.

This initiative supports the operational rollout of the Group's sustainability strategy by combining awareness actions (short videos and webinars), engagement activities (toolkits for managers, employee challenges), and training modules (e-learning), all built around key themes promoted by Groupama: solidarity, responsible finance, contribution to local development, and more.

Since its launch, the programme has enabled the delivery of 79 training sessions in France via the e-learning course "CSR at the Heart of Groupama's Strategy." To date, 11,837 employees have been trained: **5,126** via the simplified version and **6,711** via the full version composed of six modules.

At the same time, to specifically support **mutualist board members**, a complete set of online training courses has been made available via the Group's intranet. This includes: a general e-learning course titled **"Awareness of Climate Change and Its Consequences"** and another course, **"Sustainable Finance & Climate Lab"**.

These modules address key topics such as climate change, challenges faced by the insurance industry regarding climate risks, and the reform of agricultural multi-risk coverage. A similar e-learning approach has also been rolled out for Group employees.

Recognizing that sustainability issues concern both its role as insurer and investor, Groupama strengthened the expertise of its investment teams in 2024 by offering a dedicated training session on deforestation.

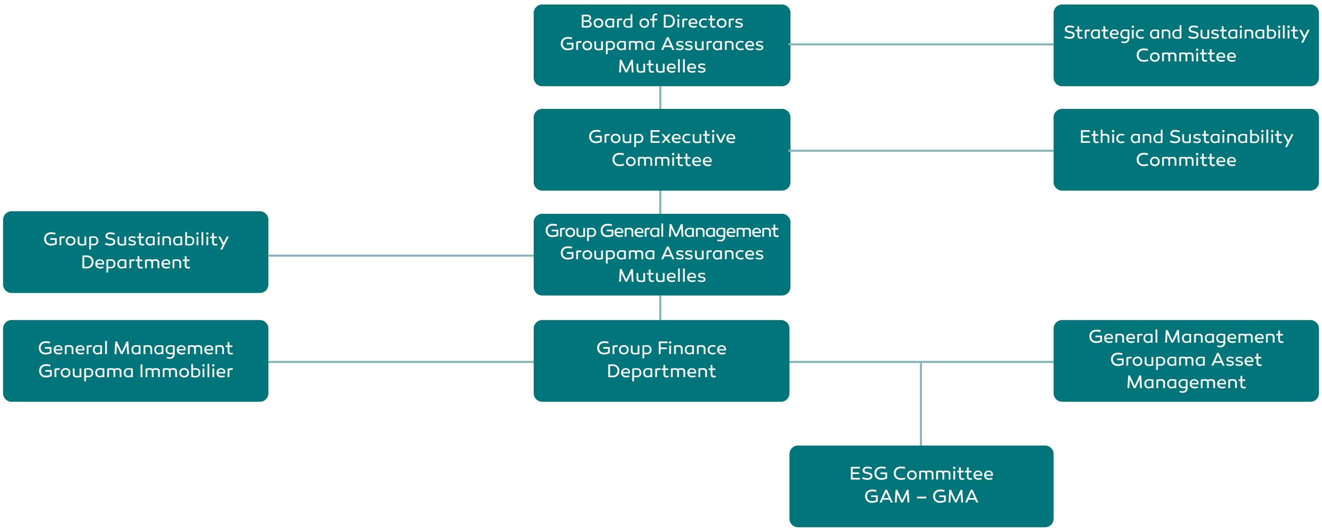
In 2025, a new session will be organized focusing on water-related challenges.

The goals pursued through these training initiatives are clear:

- Provide concrete responses to the specific challenges of each business line and the specifics of the sustainable investment strategy
- Mobilize specialized teams around the deployment of the Group's biodiversity strategy
- Deliver operational solutions to effectively integrate environmental issues into business processes

III. A DEDICATED GOVERNANCE STRUCTURE FOR SUSTAINABILITY

A. MULTIPLE BODIES WITH COMPLEMENTARY ROLES SERVE A COHESIVE AND EFFECTIVE SUSTAINABILITY GOVERNANCE FRAMEWORK



› THE BOARD OF DIRECTORS, SUPPORTED BY THE STRATEGY AND SUSTAINABILITY COMMITTEE, VALIDATES THE OVERALL ORIENTATIONS OF THE SUSTAINABLE INVESTMENT STRATEGY

The Board of Directors of Groupama Assurances Mutuelles (GMA) is supported by several committees that assist in fulfilling its responsibilities, enabling the integration of sustainability-related risks and opportunities into decision-making processes and operational activities.

Composed of 13 directors—elected representatives from regional mutuals and independent members—and 2 employee representatives, the GMA Board is responsible for approving the sustainable investment strategy, as part of the Group's overall investment strategy.

This sustainable investment strategy is approved by the Board after review by its Audit and Risk Committee. Boards of Directors at each French and international entity also approve the implementation of this strategy within their own portfolios.

Two Board committees address sustainability issues:

- **The Strategy and Sustainability Committee** (CSD) meets at least four times a year and reviews the sustainability strategy, the sustainability report, the ESG-Climate report (Article 29 of the Energy-Climate Law), and all matters related to sustainability.
- **The Audit and Risk Committee** (CAR) reviews the ORSA report, which incorporates climate-related risks, and the risk mapping, which includes extra-financial risks.

Milestones of the **sustainability strategy**, as well as the **double materiality analysis**, were reviewed by the Board of Directors and the Sustainability Committee, with a rythm of one meeting per semester.

The **Article 29 LEC report** was presented to the Sustainability Committee and the Board of Directors. In 2025, the report will also be presented to these bodies.

> THE ETHICS AND SUSTAINABILITY COMMITTEE EXERCISES OVERSIGHT

The **Group Sustainability Department** (see below) reports on the strategy's progress to the **Ethics and Sustainability Committee** (CED), which includes GMA's general management (CEOs and deputy CEOs who are members of the Executive Committee) and directors from regional mutuals. This committee reports to the **Group Executive Committee** (CEG) and meets **four times per year**. The CED's findings are shared with the CEG on a **quarterly basis**.

Main topics addressed in 2024 were as follows; they cover the key sustainability issues for the Group and its entities:

- **Preparation of the CSRD-aligned reporting**, including double materiality analysis;
- **Sustainable finance**, life insurance offerings, and Taxonomy KPIs;
- **Sustainable transition** in non-life product offerings
- **Decarbonization efforts** (current and future expanded scope);
- **Training of board members** and executives on sustainability;
- **The Group's extra-financial ratings.**

> THE SUSTAINABILITY DEPARTMENT LEADS ESG GOVERNANCE

The Group Sustainability Department, created in 2023, coordinates governance by acting as a central orchestrator, while respecting subsidiarity. It works with specialized teams in Group entities—such as the Sustainable Finance Team within the DOFI—to deploy the sustainable investment policy.

The department includes a director and six staff members, reporting to the Deputy CEO of GMA (in charge of Group strategy, HR, and general secretariat), who sits on both the GMA Executive Committee and the Group Executive Committee.

Its key responsibilities include: preparing and facilitating governance meetings related to sustainability (e.g., CEG, Board), driving the rollout of the sustainability strategy across entities and proposing an optimized organizational structure to ensure regulatory developments in sustainability are anticipated and properly integrated across the Group.

> THE FINANCIAL OPERATIONS AND INVESTMENT DEPARTMENT (DOFI) PLAYS A CENTRAL ROLE IN DEFINING AND EXECUTING THE SUSTAINABLE INVESTMENT STRATEGY

Since 2022, the Financial Operations and Investment Department (DOFI) has been responsible for designing, implementing, and updating the Sustainable Investment Charter, applicable to all Group subsidiaries.

Operational implementation of the sustainable investment strategy largely falls under the DOFI's responsibility. The DOFI:

- **Defines the Group's sustainable investment policies**, including exclusion criteria and engagement guidelines – especially on climate – to limit exposure to sustainability risks;
- **Oversees implementation by asset managers**, with regular committees for GAM and Groupama Immobilier;
- **Develops and applies selection tools** for its own investments;
- **Calculates regulatory indicators** at Group level, integrates ESG data into Group reports, and produces dedicated reporting;
- **Selects non-listed funds**, excluding real estate and forestry.

In addition to the DOFI's key roles, risk governance bodies are in place: a Group Risk Committee and risk committees by risk family, as detailed in Section VIII of this report.

› THE SUSTAINABILITY NETWORK PROMOTES ESG CULTURE AND PRACTICE ACROSS THE GROUP

Led by the Group Sustainability Department, the Sustainability Network includes 34 sponsors (members of entity executive committees) and sustainability leads across entities and business lines of GMA.

Two complementary roles are defined within the network:

- **Sustainability Sponsors, part of the executive teams**, ensure the deployment of the sustainability strategy in their entity, monitor performance, collaborate on cross-functional initiatives, share best practices, participate in Group sustainability governance, and report feedback. They are often supported by a local sustainability lead;
- **Group Sustainability Business Leads bring subject matter expertise** (e.g., finance), monitor ESG developments in their domain, share knowledge across entities, and lead cross-cutting projects.

Together, sponsors and leads contribute to prioritizing sustainability, managing performance, fostering collaboration, and coordinating initiatives across the Group.

› SUSTAINABILITY IN BUSINESS LINES

Each business line has appointed a sustainability lead, and regular exchanges are organized between the Group Sustainability Department and key business departments (e.g., communications, sustainable investment, product development) to discuss their challenges, objectives, and trajectories. This ensures that the Sustainability Department maintains a comprehensive view of progress across all topics.

B. GROUPAMA WORKS TO INTEGRATE SUSTAINABILITY RISKS INTO ITS COMPENSATION POLICIES

The Group's stated objective is to develop a **compensation policy that incorporates ESG criteria and performance indicators** for all of its executives. This policy is currently under development.

As of the end of 2024, the Group had formalized the inclusion of a **sustainability criterion** for executive corporate officers, representing **8% of their variable compensation** (see Group Sustainability Report 2024). For example, the variable compensation of the CEO of GMA includes a sustainability criterion.

This mechanism is approved and updated by the **Board of Directors of GMA**, based on proposals from the **Remuneration and Nominations Committee**.

Beyond executives, sustainability criteria were introduced for the first time for the 2022–2024 three-year period in **profit-sharing agreements for GMA employees**.

IV. ENGAGEMENT STRATEGY WITH ISSUERS AND ASSET MANAGERS AND IMPLEMENTATION OVERVIEW

Groupama implements its engagement strategy on two levels: first, with internal Group entities to which it delegates asset management, namely Groupama Asset Management and Groupama Immobilier; second, with external asset managers in which it invests part of its unlisted assets.

A. ENGAGEMENT STRATEGY WITH INTERNAL GROUP ENTITIES AND EXTERNAL ASSET MANAGERS

The **Financial Operations and Investment Department** (DOFI) is involved on a daily basis in governance related to the delegated asset management entrusted to **Groupama Asset Management** and **Groupama Immobilier**. This involvement takes the form of **formal and regular meetings**, enabling rigorous monitoring of the commitments made and objectives set. These meetings consistently include **specific agenda items**, such as: monitoring of financial performance, compliance with responsible investment strategies and in-depth analysis of ESG risks associated with the portfolios.

Beyond this daily oversight, the Group has **formally delegated to Groupama Asset Management** the operational implementation of its engagement policy with listed issuers. The details of this implementation are provided in the following section.

As part of its relationships with **external asset managers**, Groupama has established a systematic process to assess the **maturity and robustness of their responsible investment policies** through a dedicated questionnaire, as previously described in section I.B.

This questionnaire enables Groupama to evaluate the ESG approach of these management companies and **initiate discussions** accordingly.

B. ENGAGEMENT ACTIONS CARRIED OUT BY GROUPAMA AM ON BEHALF OF THE GROUP

Groupama Asset Management (GAM) implements two forms of engagement on behalf of the Group: its standard engagement activities with listed issuers, aimed at positively influencing their ESG practices and targeted actions directly tied to the Group's Net Zero commitments, including active dialogue with companies to encourage them to define and implement climate strategies aligned with the Group's climate objectives.

GAM's engagement policy is structured around three main pillars:

1. **Sustainability risks;**
2. **Energy and environmental transition;**
3. **Value sharing.**

At GAM, engagement and voting policies reflect a strong commitment to fulfilling its role as a responsible investor. These policies are considered essential complements to other ESG strategies, especially sector-based policies.

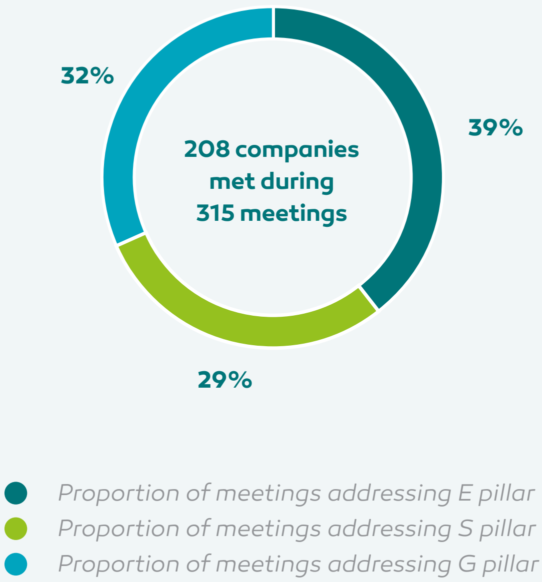
Engagement is based on the following levers:

- **Regular dialogue with companies;**
- **Individual and collaborative engagement initiatives;**
- **Exercise of voting rights.**

› DIALOGUE

GAM analysts and portfolio managers engage regularly with company leadership. These meetings are opportunities to discuss sector- or company-specific ESG issues, as well as any controversies involving certain companies — particularly those on the **High ESG Risk list** or those excluded under the **fossil fuel sector policy**. The insights gathered during these discussions enrich GAM's analyses and help guide investment decisions.

Proportion of ESG pillars addressed by GAM in its dialogue with companies (*)



(*) Data rebased, as some meetings may cover the E, S, and G pillars simultaneously.

Example of a dialogue with a portfolio company

ALTEN

Discussions around the following topics:

1. Succession plan for the 67-year-old CEO in the absence of a designated successor
2. Integration of short- and long-term ESG criteria into the remuneration policy. We are requesting the addition of a criterion linked to the climate strategy, in line with the work of the CSR committee that led to the Net Zero 2050 commitment validated by the SBTi, with intermediate targets for 2030 covering all three scopes

Engagement at Groupama Asset Management takes two main forms and aims to improve companies' ESG practices:

1. **Collaborative engagement:** Participation in collective initiatives with other investors, support for or proposal of shareholder resolutions at General Meetings.
2. **Individual engagement:** Direct dialogue with targeted companies to encourage better ESG practices.

Each engagement action must clearly define its **objectives, rationale, targeted sectors or companies, expected duration**, and **explicit link** with the themes defined in the engagement policy.

For collaborative engagements, the precise role and level of involvement of Groupama Asset Management — as well as those of other stakeholders — are clearly specified.

Governance of GAM's engagement policy is overseen by its **Chief Executive Officer**, who signs off on all engagements. Operational oversight is handled by GAM's **Shareholder Engagement Committee**, chaired by the CEO or Deputy CEO.

For more information about GAM's engagement policy, visit:

Collaborative engagement

Participating in collective initiatives allows for resource pooling and speaking with one voice to companies. In fact, when a group of investors shares a common ESG analysis, it can help clarify the message to company executives and make the dialogue more effective. **In 2024, Groupama AM joined five new collaborative initiatives:**

Initiatives	Objective	Result	Status
Coordination Phitrust - AGM Resolution - TotalEnergies	Request to allocate share buybacks to the financing of renewable energy instead of cancelling them	Quorum was not reached	Closed
FollowThis - Shell AGM 2024 - Co-filing of resolution	Co-file a resolution at Shell's 2024 AGM for an advisory vote to get the company to align its mid-term GHG reduction targets (Scope 3) with the Paris Agreement	Resolution received approximately 20% favorable vote	Closed
Letter sent to ENI, Shell, BP	Co-sign a letter to ENI, Shell and BP with Candriam/Reclaim Finance on their fossil fuel expansion strategy at the expense of renewables, with an opposing vote in case of board chair renewal if no progress is made	Vote against board chair reappointments where applicable in absence of progress	Closed
PRI - Say on climate - Footsie 100	Send a joint letter to FTSE 100 companies that have not submitted a Say on Climate at AGMs since 2022, encouraging them to put their climate plan to a shareholder vote	To be monitored during 2025 AGM season.	Ongoing
FIR - Club SMID / Governance	Engage ID Logistics on governance-related topics	Company followed up multiple times	Ongoing

Individual engagement

Convinced that some companies have significant potential to improve their ESG practices, Groupama Asset Management (GAM) favors a more personalized approach to engagement. GAM has chosen to engage with a limited number of companies — those with the most pressing ESG improvement needs — in order to ensure high-quality support and tangible results.

In 2024, GAM held meetings with companies under individual engagement. These meetings offer valuable opportunities to assess progress, review the achievement of engagement objectives, and share both the companies' challenges and best practices observed by GAM in other issuers.

Within the scope of companies held in portfolios managed by GAM on behalf of the Group, engagement in 2024 included:

15
individual engagements in progress, including 5 companies met

2
meetings held as part of pre-AG dialogue

32
companies contacted via formal letters

8
companies engaged under "Say on Climate" initiatives

NEW IN 2024: FORMALIZATION OF AN ESCALATION POLICY

When an engagement is deemed unsuccessful[9], an escalation process is activated. This process includes several intermediate steps, validated by the Shareholder Engagement Committee, such as sending a letter to the company's board of directors, organizing additional meetings or joining a collaborative engagement on the same issue.

The assessment of potential escalation actions involves prior analysis of the positions held, in order to determine appropriate actions. This analysis considers: the amount of exposure, the nature of the assets held (e.g., equities, bonds, money market) and the types of portfolios involved (e.g., labeled funds, open-ended or dedicated funds).

If the expected progress is not achieved, escalation may lead to the following actions:

- Reinforced dialogue;
- Actions at General Meetings (e.g., opposing votes, shareholder questions, external resolutions);
- Public disclosure via Article 29 of the Energy-Climate Law or in the engagement report;
- Portfolio management measures: no increase in holdings, suspension of reinvestments, partial or total divestment of the managed scope.

The choice of actions depends on how the situation evolves and is decided on a case-by-case basis, always in the best interest of investors.

[9]GAM considers an unsuccessful engagement to include, in particular, the following cases: refusal to address raised concerns, failure to meet the agreed timeline, and lack of significant progress on the defined monitoring indicators. An engagement will be deemed unsuccessful after a minimum period of two years.

› VOTING POLICY

The Annual General Meeting (AGM) is a key event where companies communicate with and are held accountable to their shareholders. It also allows investors to express approval or opposition to the actions of corporate leaders — especially through voting.

GAM's voting policy supports its sustainability goals by reviewing corporate practices. The policy was updated in 2024, incorporating themes that were central during the 2023 proxy season and emerging trends for 2024, such as corporate transition plans. Stakeholder reports from bodies like AMF, HCGE, and IFA were also considered.

Groupama AM's full voting policy is available here: **https://www.groupama-am.com/fra/fr/institutionnel/finance-durable.**

In practice, in 2024 Groupama Asset Management cast its vote at 424 General Meetings during the year.

The vast majority (87%) of the resolutions submitted to a vote concerned governance issues.

Key statistics for companies held in portfolios managed by GAM on behalf of the Group

424
Number of General Meetings where GAM voted during the year

99%
Proportion of the voting policy scope that was subject to a vote

87%
Proportion of governance topics in the resolutions

58%
Approval rate of resolutions submitted by the Board of Directors

5,726
approuved resolutions

1,474
rejected resolutions, representing 20% of the proposed resolutions

12
external resolutions supported relating to climate, for a total of 13

Examples of how key elements of the voting policy were applied follow in the report:

Topic	Objective	Result
Board member appointments	Reach 30% women on the Board of Directors (except in countries with a higher quota)	Opposition to 716 board member appointments
	Limit the share of board members over 70 years old to one-third of the Board	Opposition to 8 board member appointments
	Limit to a single term the ability for a former CEO to become Chairman of the Board	Opposition to 8 board member appointments
Executive remuneration	Ensure at least one climate or environmental criterion is included in performance metrics for all large-cap companies	Opposition to 67 remuneration-related resolutions
Board of directors	Vote against reappointment of the board chair in large-cap companies lacking a CSR strategy with climate objectives or without a CSR committee	Opposition to 6 resolutions

KEY 2024 UPDATES TO THE VOTING POLICY

Directors:

- The threshold for considering a director "independent" has been raised from 3% to 5% of voting rights held.

Corporate Transition Plans:

- A net-zero target for 2050 must be accompanied by a transition plan to reduce GHG emissions (scopes 1, 2, and 3), with short-, medium-, and long-term targets;
- Share buybacks should not undermine necessary investments for implementing transition plans;
- Implementation of the transition plan is now a component of long-term executive compensation.

Voting Policy Beyond Europe[10]:

- In Canada and Japan, GAM now applies ISS's SRI voting policy automatically, as has been the case in the U.S. since 2023.

[10] Groupama Asset Management's voting policy applies only to European securities. For non-European securities, GAM relies on ISS policies.

V. EU TAXONOMY AND FOSSIL FUELS EXPOSURE

To identify environmentally sustainable activities, the Group calculates the share of its investments that are **eligible for and aligned with the EU Taxonomy**. This regulation, a cornerstone of the European Union's action plan for a greener economy, aims to establish a **common language** for identifying economic activities considered environmentally sustainable.

The taxonomy is structured around six environmental objectives:

- Climate change mitigation
- Sustainable use and protection of water and marine resources
- Climate change adaptation
- Transition to a circular economy
- Protection and restoration of biodiversity and ecosystems
- Pollution prevention and reduction

The evaluation is based on two distinct levels:

- **Eligibility:** whether a company's economic activity falls within the scope of one of the six environmental objectives;
- **Alignment:** whether this activity meets the technical screening criteria for contributing to an objective, does not significantly harm the other objectives, and respects the minimum social safeguards set by the regulation.

At the portfolio level, the Group aggregates **eligibility and alignment data** provided by **Clarity AI** for the companies it holds.

A. EU TAXONOMY ELIGIBILITY

The following calculations are based on data as of end of 2024:

Group eligibility based on revenue	**27%**
Group eligibility based on CapEx	**29%**

Thus, in 2024, **27%** of the Group's investments were eligible under the EU Taxonomy based on **revenue**, and **29%** based on **capital expenditures**, for a **72% coverage rate** of assets covered with KPIs[11].

[11]Key Performance Indicators.

B. ALIGNMENT WITH THE EU TAXONOMY

The following calculations are based on data as of end of 2024:

Indicator	2024 value	2023 value
Weighted average value of all investments intended to finance or associated with EU Taxonomy-aligned economic activities, relative to the total value of assets covered by the KPI, for investments in companies:		
Based on revenue	4%	2%
Based on capital expenditures	5%	4%
Monetary value of all investments of the insurance or reinsurance company intended to finance or associated with Taxonomy-aligned economic activities, for investments in companies:		
Based on revenue	€2,383m	€1,162m
Based on capital expenditures	€2,984m	€2,364m
Percentage of assets covered by the KPI relative to total investments of the insurance or reinsurance company (total assets under management) *Excluding sovereign investments (coverage ratio)*	72%	71%

For the year **2024**, the share of **Groupama Group's investments aligned with the EU Taxonomy** is **4%** based on revenue, **5%** based on capital expenditures for a **coverage rate of 72%** of assets under the KPI.

Since the regulation is not yet fully mature, the **levels of eligibility and alignment remain relatively low** at this stage. This is due to the fact that not all companies fall within the scope of the regulation, and **some technical criteria are still difficult to interpret and apply in practice**.

C. SUPPORTING THE ENERGY TRANSITION BY REDUCING THE GROUP'S FOSSIL FUEL DEPENDENCE AND BROWN SHARE

As of December 31, 2024, Groupama assessed both the brown share of its activities and specifically reviewed its exposure to coal and unconventional fossil fuels.

Three indicators were calculated:

1. **Brown share:** represents the portion of companies involved in the **extraction**, **upstream production**, and **midstream transport** of fossil fuels (coal, oil, gas).
2. **Coal share:** reflects the share of investments in companies that derive part of their business from **thermal coal**.
3. **Unconventional fossil fuels share**[12]**:** refers to the share of investments in companies involved in **unconventional fossil fuels** (e.g., oil sands, shale oil, Arctic drilling).

Two methodologies are applied to each of these indicators:

4. **Weighted values:** exposures to issuers listed in the **Global Coal Exit List** (GCEL) and the **Global Oil & Gas Exit List** (GOGEL) are adjusted based on the issuer's **relative involvement in fossil fuel activities**, as reported by the **Urgewald** organization.
5. **First-euro values:** exposure is calculated by taking into account the **full amount of the Group's investment** in the relevant companies. No weighting is applied — **100% of the market value** of holdings in companies listed in GCEL and GOGEL is included. This method is used to calculate **PAI 4** under the **SFDR regulation**.

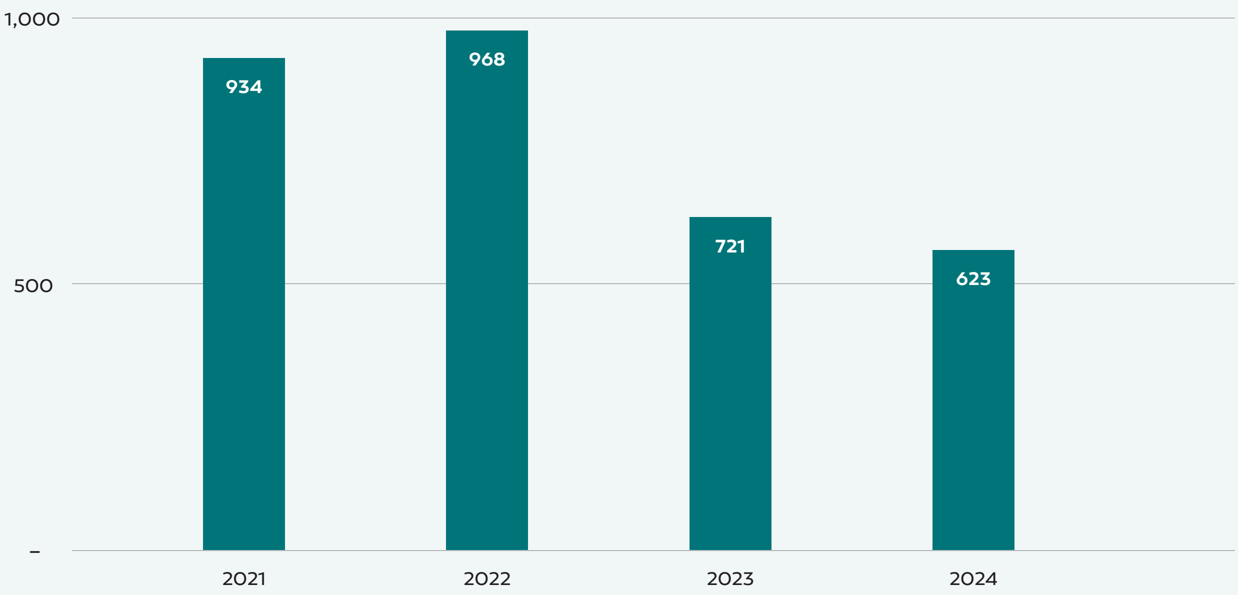
The table below shows the weighted exposure, from the very first euro, to fossil fuels as a percentage of the Group's total assets excluding UCITS. For 2024, the figures are calculated based on the scope of equities and corporate bonds.

	Weighted exposure to fossil fuels		Exposure to fossil fuels from the first euro	
	2023	2024	2023	2024
Brown share	2.48%	2.02%	3.59%	2.63%
Coal	0.03%	0.02%	0.57%	0.07%
Unconventional fossil fuels	0.30%	0.25%	1.25%	0.94%

These analyses — whether weighted by revenue share or not — both highlight a decline in the brown share of the Group's portfolios. This is a direct result of its fossil fuel policies, continuously implemented since 2022, as illustrated in the graph below.The Group's coal exposure is now nearly zero, demonstrating the effectiveness of its exclusion policy.

[12] Fracking, oil sands, coal methane, extra-heavy oil, ultra-deepwater, and the Arctic.

Weighted and first-euro exposure to fossil fuels as a percentage of the Group's total assets (in €m)



VI. ALIGNMENT STRATEGY WITH THE OBJECTIVES OF THE PARIS AGREEMENT

Tracking table of objectives set by the Groupama Group under its climate policy			
Type of objective	**Covered scope**	**Objective**	**Status as of 31/12/2024**
Decarbonization	Corporate equities and bonds	Reduce scope 1 & 2 GHG emission intensity (tCO_2eq / €m turnover) by 50% between end of 2021 and end of 2029.	Target achieved: -60% as of December 31, 2024.
	Real estate	Reach by 2030 the level defined by the CRREM trajectory for directly held investment real estate assets (excluding residential).[13]	The carbon intensity of office real estate assets subject to the tertiary decree decreased by 22% between 2020 and 2024.
Engagement	Corporate equities and bonds	Implement engagement actions with 20 of the most carbon-intensive companies held in the Group's portfolio by 2026.	10 carbon-intensive companies were the subject of an engagement action as of the end of 2024.
Green investments	All Group assets	As part of the Group's sustainable investment programme, a significant portion is allocated to the financing of green investments, particularly via the Group's sizable Green Bond and green real estate allocations.[14]	€1,039m in sustainable investments completed in 2024, including a portion of green investments.

[13] This commitment applies to assets for which Groupama Immobilier has actual data on energy consumption and carbon emissions.
[14] Green real estate represents real estate investments that fall within the Group's definition of sustainable investment. These include investments in assets labeled or certified from an environmental or energy perspective, or projects aligned with the European taxonomy.

Progress made in 2024

Corporate equities and bonds

01

Formalization of a methodology for analyzing transition plans

Groupama relies on a methodology formalized by GAM. It is dedicated to assessing the credibility of the climate transition plans of companies in the portfolio, thereby strengthening the rigor of its ESG analysis.

02

Assessment of science-validated pathways

The Group assessed the proportion of companies whose emission reduction pathways are validated by the Science-Based Targets initiative (SBTi), confirming their alignment with climate goals.

03

Strengthened implementation of the fossil fuel exclusion policy

Groupama has extended its exclusion policy to the conventional oil and gas sectors, in line with its ESG commitments (detailed in section 1.C.), in order to reduce exposure to fossil fuels.

04

Expansion of scope 3 emissions reporting perimeter

The reporting perimeter for indirect emissions has been extended to include both upstream and downstream Scope 3 emissions, providing a more comprehensive view of the carbon impact of invested companies.

Sovereign bonds

05

Climate assessment of sovereign issuers using the ASCOR[15] Model

Groupama uses the ASCOR model to assess the climate performance of sovereign issuers. This tool enables better integration of climate risks into the management of sovereign bonds.

Real estate

06

Deployment of real energy and carbon data collection

Groupama Immobilier is expanding the collection of actual data on energy consumption and carbon emissions, improving the accuracy of environmental monitoring.

Finally, this year, the Group changed its data provider for carbon analyses: Iceberg Data Lab was replaced by MSCI. To enable comparison with historical data, the Group recalculated carbon intensities for Scopes 1 and 2 for previous years starting from 2021.

2025 objectives

Corporate equities and bonds

01

Analysis of transition plans of carbon-intensive companies

Groupama AM will apply its specific methodology to assess the credibility of the transition plans of the 15 most carbon-intensive companies in the Group's portfolio.

02

Deepening the analysis of scope 3 data

In 2025, Groupama will strengthen the analysis of indirect greenhouse gas emissions related to Scope 3, with a focus on the different Scope 3 categories.

Real estate

03

Ongoing collection of energy and carbon data

Groupama Immobilier will continue to expand the collection of actual data on energy consumption and carbon emissions related to its real estate assets.

04

Implementation of a structured action plan

A formalized action plan will be developed, incorporating targets for reducing energy consumption and carbon emissions, the associated CAPEX/OPEX, as well as an implementation schedule.

The Net-Zero Asset Owner Alliance is a United Nations-backed initiative that brings together international insurers and pension funds committed to transitioning their investment portfolios to net-zero carbon emissions by 2050. The members aim to contribute to limiting global warming to 1.5°C above pre-industrial levels, in line with the Paris Agreement.

[15] ASCOR: *Assessing Sovereign Climate-related Opportunities and Risks.*

As a member of the NZAOA, the Group has made three commitments to achieve carbon neutrality by 2050:

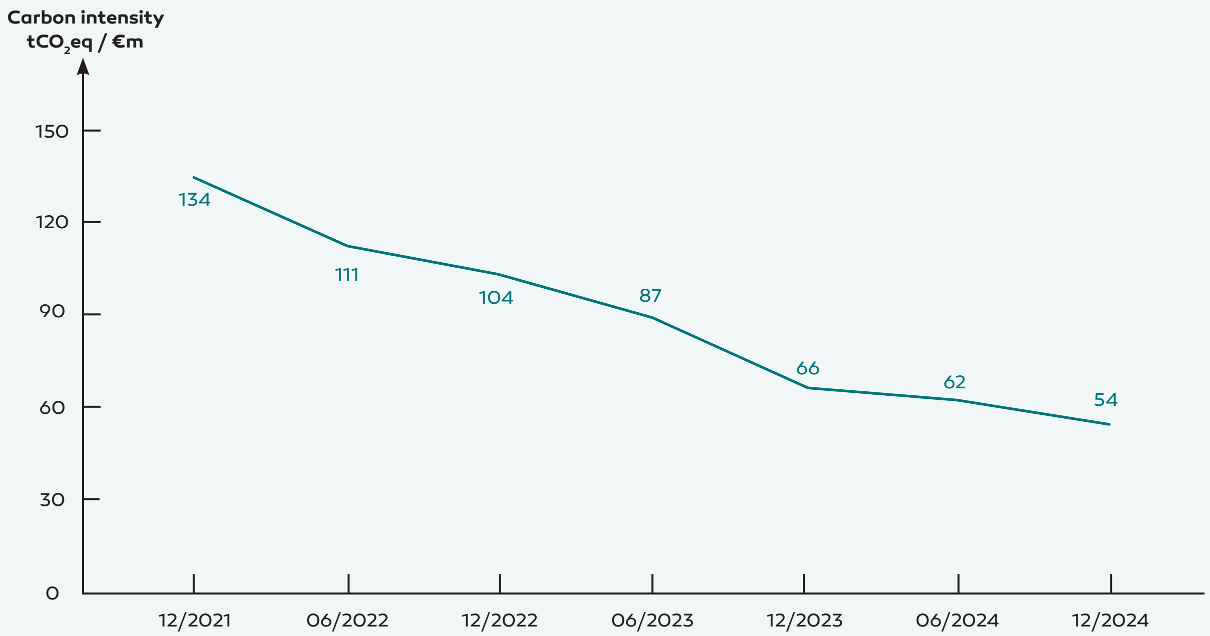
Decarbonize investments by 2030	Engage portfolio companies	Finance the transition
The Group has set a target for its portfolio of listed corporate equities and bonds, as well as a real estate objective, aligned with NZAOA (Net-Zero Asset Owner Alliance) requirements. This commitments is currently being extended to other asset classes.	Engage with 20 companies by 2026 on transition planning topics. In 2024, engagement has been initiated with 10 companies.	Finance the energy transition through green investments from its additional sustainable from its additional sustainable investment program, renewed for €1.2 billion over 2024-2027. This is mainly carried out through investments in infrastructure, real estate, and green bonds.

A. DECARBONIZE: A COMMITTED PATH AND TANGIBLE RESULTS

1. FOR EQUITIES AND CORPORATE BONDS

the Group has committed to meeting the Group's target of reducing Scopes 1 and 2 GHG emissions intensity (in tCO_2eq / €m turnover) from its equity and corporate bond portfolio by 50% between the end of 2021 and the end of 2029.

Reduction in carbon intensity (Scopes 1 and 2) of the Group's equity and corporate bond portfolio



Following the change of carbon data provider during 2024, the Group recalculated the carbon intensity of its portfolios based on inventories from previous years. This change also allowed the reporting scope to be expanded to include all Scope 3 emissions[16].

At this stage, available Scopes 1 and 2 emissions data are robust. For all private issuers held in the portfolio: 92% have carbon emissions data available, of which 90% are directly reported by the companies, and the rest are estimates.

[16] The Group previously relied only on upstream Scope 3 data. Today, Scope 3 also includes downstream activities of companies.

As for Scope 3 emissions (both upstream and downstream) from financed companies, the available data still involve too many uncertainties to allow for a minimum reliable assessment. The main reasons are:

- **Partial availability of reported data:** when companies do report Scope 3 emissions, the data often cover only a limited range of activities. For example, they may include only business travel emissions, which represent a small share of a company's total carbon footprint.
- **Estimated data are often hard to interpret and may be questionable:** due to the lack of comprehensive disclosures, most Scope 3 figures are based on estimates. Moreover, since the data providers' estimation models are not accessible, it is very difficult to compare these with the actual values later published by companies.
- **General lack of reliability (for both reported and estimated data), compounded by high and unpredictable volatility from year to year.** These issues introduce too much bias to ensure a stable assessment of carbon intensity and make it difficult to define consistent monitoring actions and metrics — let alone formal commitments.

Groupama will continue working with its data provider to obtain Scope 3 emissions data (both upstream and downstream) that are sufficiently comprehensive, granular, and reliable.

The first reports compliant with the CSRD directive are expected to improve transparency and clarity regarding the actual emissions of financed companies. However, due to the persistent instability of Scope 3 data, a multi-year adjustment period will likely be needed.

As a result, emissions from this category should be presented separately from Scopes 1 and 2 emissions.

› GLOBAL EQUITY AND CORPORATE BOND PORTFOLIO

The equity and corporate bond portfolio represents **46.5%** of the Group's total assets, excluding unit-linked products and repos, amounting to **€30.8 billion as of 31/12/2024**.

		2024			2023	
Measurement indicator	Unit	Equity and corporate bond portfolio	Coverage	Reported data share	Equity and corporate bond portfolio	Coverage
Carbon emissions (scope 1 - 2)	tCO_2e	1,173,640	90%	86%	1,270,686	75%
Carbon intensity (scope 1 - 2)	tCO_2e/€m turnover	53.7	93%	86%	65.6	92%
Total carbon intensity (scope 1 - 2 - 3)	tCO_2e/€m turnover	621.3	81%	0%	n.a.(*)	n.a.(*)

(*) Scope 3 data not recalculated on a pro forma basis following the change of service provider.

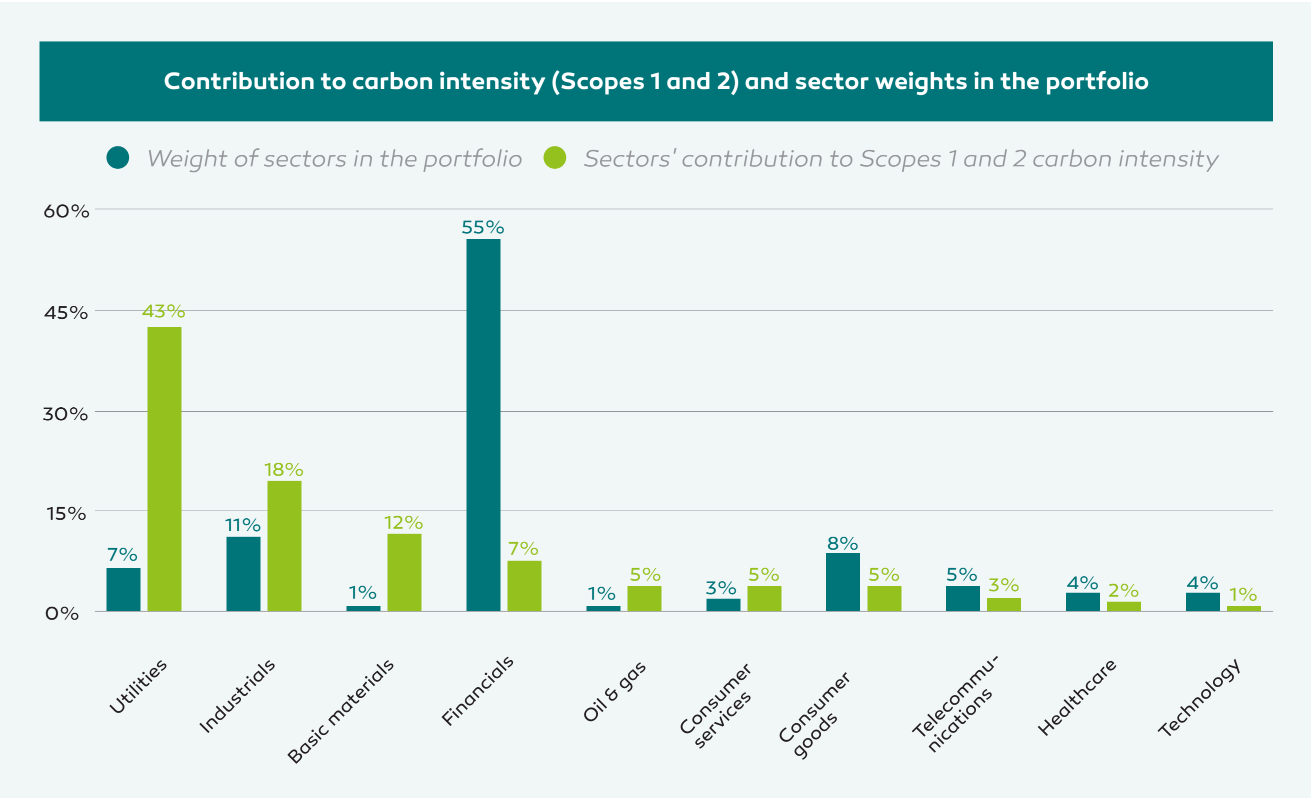
Scopes 1 and 2 carbon intensity decreased from **61.5 tCO_2e/€m turnover in 2023 to 53.7 tCO_2e/€m turnover in 2024**, representing a **13% reduction year over year**, and a **60.2% reduction since the end of 2021**, the Group's baseline year for its emissions reduction target.

The table below shows the breakdown of Scopes 1 and 2 carbon intensity of the Group's equity and corporate bond portfolios by sector:

	Corporate equities and bonds portfolio as of 31/12/2024			Corporate equities and bonds portfolio as of 31/12/2023		
	Sector intensity (Scopes 1 - 2)	Weight	Sector contribution (Scopes 1 - 2)	Sector intensity (Scopes 1 - 2)	Weight	Sector contribution (Scopes 1 - 2)
Utilities	315	7%	43%	364	8%	44%
Industrials	91	11%	18%	112	10%	17%
Basic materials	660	1%	12%	762	1%	14%
Financials	7	55%	7%	8	54%	6%
Oil & gas	251	1%	5%	231	1%	5%
Consumer services	85	3%	5%	102	2%	4%
Consumer goods	28	8%	4%	31	9%	5%
Telecommunications	38	5%	4%	37	5%	3%
Healthcare	20	4%	2%	21	4%	1%
Technology	14	5%	1%	16	5%	1%

Scopes 1 and 2 represent the **direct and indirect emissions** linked to companies' operations (combustion, energy consumption, etc.). The sectoral analysis reveals **significant contrasts**: **basic materials** (660 tCO_2e/€m turnover), **utilities** (315 tCO_2e/€m turnover), and **oil and gas** (251 tCO_2e/€m turnover) are the **highest-emitting sectors**.

The **decline in overall carbon intensity between 2023 and 2024** is mainly due to **reduced emissions** in the **utilities**, **industrials**, and **basic materials** sectors. A further observation is the **mismatch between sector weight in the portfolio and their contribution to carbon intensity:** the **most carbon-intensive sectors account for a small share of the portfolio by value**, but a **large share of total emissions**, as shown in the graph below.



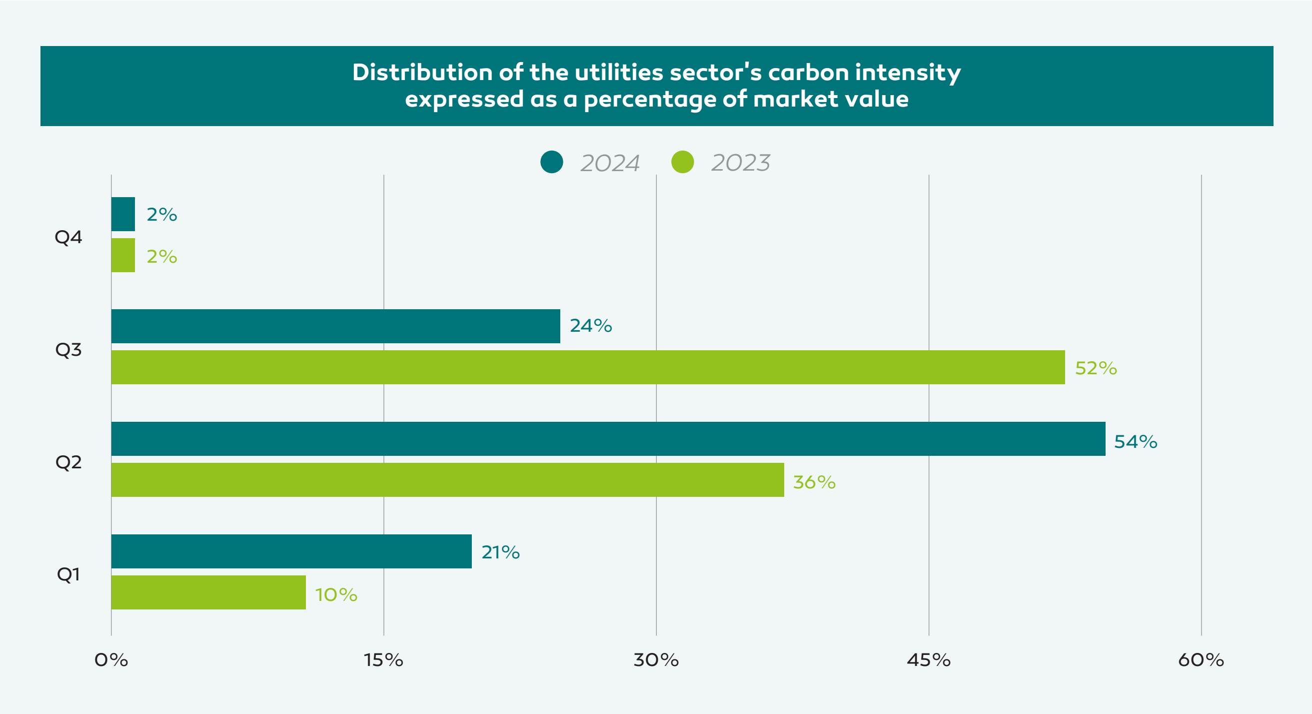
The financial sector, which represents 55% of the portfolio, has a very low carbon intensity, which significantly limits the overall carbon footprint of the portfolio — in line with previous years.

Focus on the utilities sector

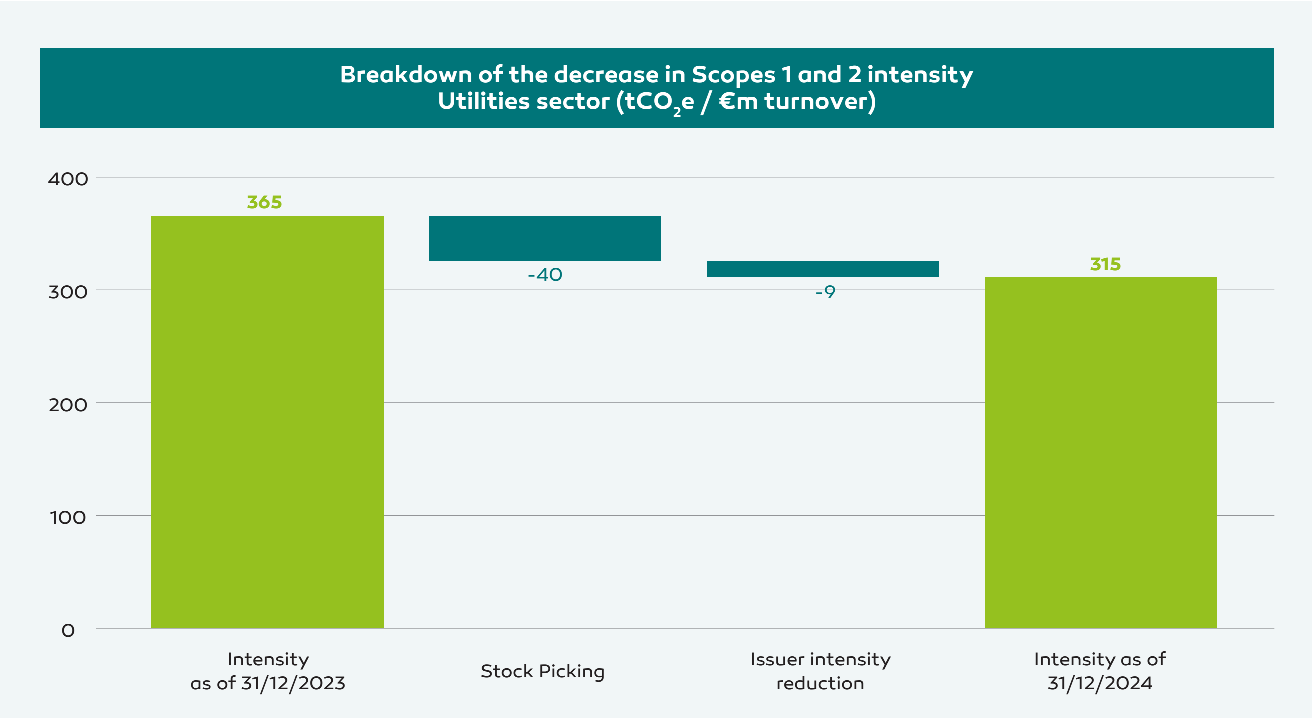
This sector, main contributor to the portfolio's carbon intensity, shows a notable decline in intensity between 2023 and 2024:

- **Average Scopes 1 and 2 intensity:** from 364 tCO_2e/€m turnover in 2023 to 315 tCO_2e/€m turnover in 2024
- **Average intensity of the top 10 holdings in the sector:** from 324 in 2023 to 261 tCO_2e/€m turnover in 2024

The distribution of the portfolio by carbon intensity quartile also changed: exposure is now concentrated in the 2nd quartile (<306 tCO_2e/€m turnover), compared to the 3rd quartile (>297 tCO_2e/€m turnover) the previous year.

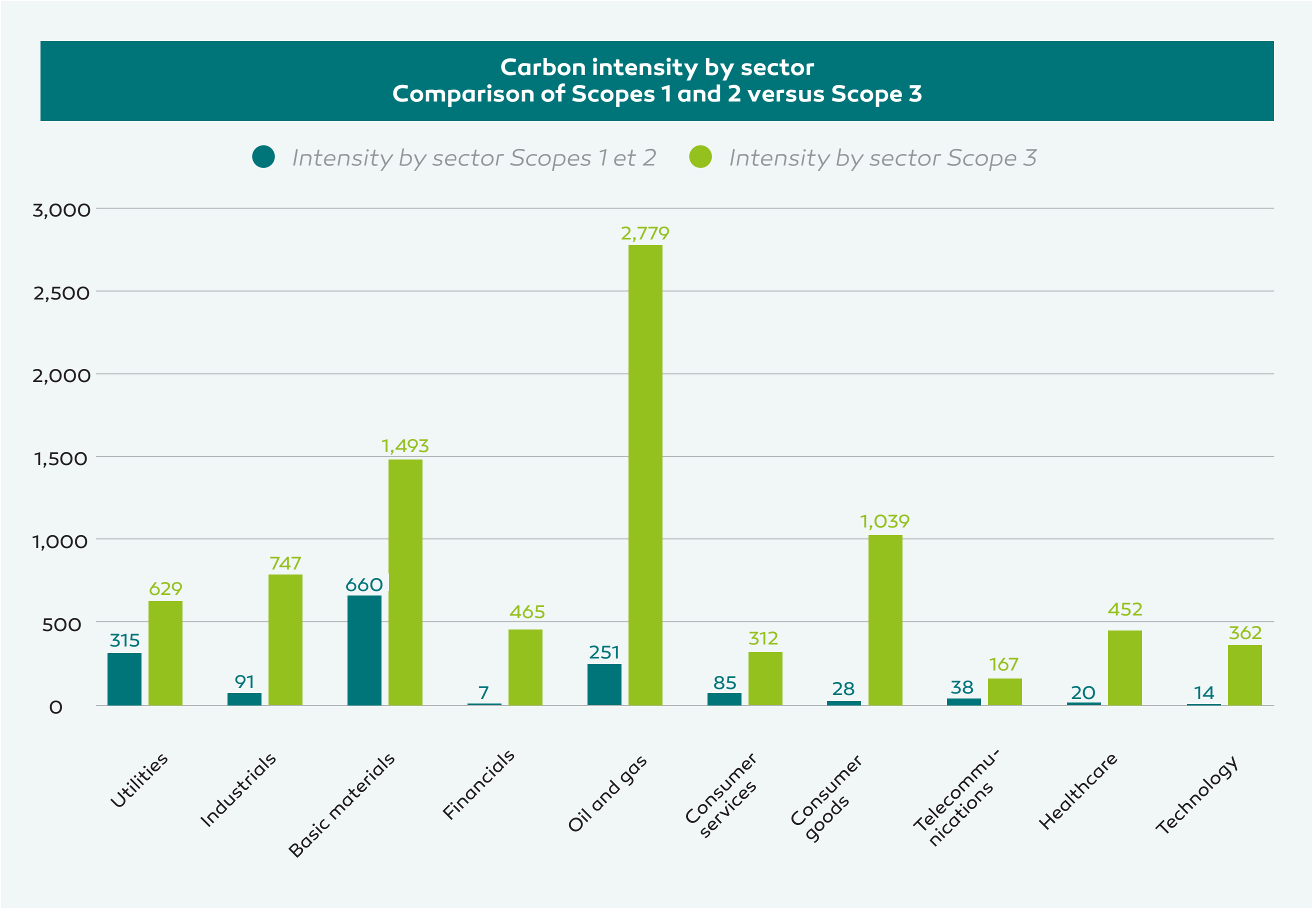


The breakdown of the carbon intensity decrease between 2023 and 2024 shows that it is primarily the result of stock picking and a portfolio shift toward less carbon-intensive utilities issuers. Efforts to reduce emissions by companies in this sector also contributed, but to a lesser extent.



Scope 3 analysis by sector

This year, the Group compared **Scope 3 emissions** to **Scopes 1 and 2** in order to identify the sectors where **indirect emissions** are the most significant.



This analysis shows that in several sectors, **Scope 3 accounts for more than 80% of total carbon intensity,** particularly in **finance**, **consumer goods**, **healthcare**, **technology**, **oil and gas**, and **telecommunications**.This highlights the importance of **indirect emissions** (e.g., product use, supply chain, financing), which are often underestimated.

The analysis underscores the **materiality of Scope 3** in sectors often perceived as "low emitters" under Scopes 1 and 2 (such as **finance**, **technology**, and **healthcare**). This finding is prompting the Group to **strengthen its transparency requirements** on Scope 3 emissions, as described above.

	Corporate equity and bond portfolio as of 31/12/2024			
	Sector intensity (Scopes 1 - 2)	Sector intensity (Scope 3)	Sector intensity (Scopes 1, 2 and 3)	Share of Scope 3 in total intensity
Utilities	315	629	944	67%
Industrials	91	746	837	89%
Basic materials	660	1493	2153	69%
Financials	7	465	472	99%
Oil and gas	251	2778	3029	92%
Consumer services	85	312	397	79%
Consumer goods	28	1039	1067	97%
Telecommunications	38	167	205	81%
Healthcare	20	452	472	96%
Technology	14	362	376	96%

Special case: the oil and gas sector

The oil and gas sector stands out for its high carbon intensity across all scopes:

- **Scopes 1 and 2:** 251 tCO_2e/€m turnover
- **Scope 3:** 2,778 tCO_2e/€m turnover
- **Total:** 3,029 tCO_2e/€m turnover, of which 92 % is from Scope 3

This sector therefore combines both **significant direct emissions** and **very substantial indirect emissions**, particularly related to the use of sold products.

This **triple contribution to emissions** makes it one of the **most carbon-intensive sectors in the portfolio** and fully justifies its **prioritization in the Group's exclusion policy**.

Furthermore, this is the **only highly emitting sector** to show an **increase in its Scopes 1 and 2 carbon intensity**, primarily due to the **deterioration in the economic performance** of certain players. Indeed, although total GHG emissions remained stable or even slightly decreased, **lower revenues mechanically led to higher carbon intensity**. More specifically, the carbon intensity of f**ive oil companies**, representing more than **50% of the Group's holdings in the sector**, rose significantly — i**ncreases ranging from 8% to 38%** compared to the previous year — even though their **emissions remained unchanged**.

It is also worth noting that the **Group's weighted brown share**, which reflects its **residual exposure to fossil fuel investments**, has been **declining since 2022**, as shown in **Section IV**.

› CORPORATE BOND PORTFOLIO

As of December 31, 2024, corporate bonds represented **41.7% of the Group's assets**, excluding unit-linked products, amounting to **€27.6 billion**. This allocation, which makes up nearly 90% of the listed portfolio excluding sovereign bonds, plays a key role in the Group's decarbonization trajectory.

Over one year, the carbon intensity (Scope 1 & 2) of the corporate bond portfolio decreased from **64 to 52 tCO_2e/€m turnover**, representing a reduction of 18.8%, in line with the trend observed across the overall equity and corporate bond portfolio.

		2024			2023	
Measurement indicator	Unit	Corporate bond portfolio	Coverage	Reported data share	Corporate bond portfolio	Coverage
Carbon emissions (scope 1 - 2)	tCO_2e	1,083,655	92%	86%	1,160,4780	78%
Carbon intensity (scope 1 - 2)	tCO_2e/€m turnover	52	94%	86%	64.3	93%
Total carbon intensity (scope 1 - 2 - 3)	tCO_2e/€m turnover	618	81%	0%	n.a.(*)	n.a.(*)

(*) Scope 3 data not recalculated on a pro forma basis following the change of service provider.

The table below shows the breakdown of Scope 1 and 2 carbon intensity of the Group's private bond portfolio by sector, compared with the Barclays Euro Aggregate index:

	Corporate bond portfolio as of 31/12/2024			Barclays Euro Aggregate as of 31/12/2024		Corporate bond portfolio as of 31/12/2023		
	Sectoral intensity (Scopes 1 – 2)	Weight	Sectoral contribution (Scopes 1 – 2)	Sectoral intensity (Scopes 1 – 2)	Weight	Sectoral intensity (Scopes 1 – 2)	Weight	Sectoral contribution (Scopes 1 – 2)
Utilities	302	8%	45%	435	8%	360	9%	48%
Industrials	93	10%	19%	179	11%	117	10%	18%
Basic materials	570	1%	9%	593	3%	684	1%	10%
Financials	7	57%	8%	14	45%	8	57%	7%
Oil and gas	254	1%	5%	267	3%	243	1%	4%
Consumer services	92	3%	5%	154	3%	108	2%	4%
Consumer goods	28	8%	4%	30	14%	32	9%	5%
Telecommunications	39	5%	4%	36	5%	38	5%	3%
Healthcare	20	4%	1%	23	6%	22	3%	1%
Technology	13	4%	1%	7	2%	13	3%	1%

This change is mainly due to **emissions reductions in seven sectors** compared to the previous year, including **significant decreases in historically high-emitting sectors**, such as:

- **Basic materials:** –16.7%
- **Utilities:** –16.1%

In addition, **eight out of ten sector**s showed an **average carbon intensity lower than that of the Barclays Euro Aggregate index** — the Group's benchmark — as of the end of 2024. This outcome reflects the **effectiveness of stock picking** in integrating climate issues into **security selection**.

Lastly, sectoral analysis reveals the **predominance of a few sectors** in the portfolio's carbon footprint:

- **Utilities**, although they represent only **8% of the portfolio**, account for **45% of Scope 1 & 2 emissions**.
- **The financial sector**, which makes up **57% of holdings**, contributes only **8% of operational emissions**, confirming its **low carbon intensity** for these scopes.

› EQUITY PORTFOLIO

As of **December 31, 2024**, the equity portfolio represented **4.8% of the Group's assets**, excluding unit-linked products, totaling **€3.2 billion**. This segment recorded a **11.7% reduction in Scopes 1 and 2 carbon intensity** over one year, falling from **76.8 to 68 tCO_2e/€m turnover**.

		2024			2023	
Measurement indicator	Unité	Equity portfolio	Coverage	Reported data share	Equity portfolio	Coverage
Carbon emissions (scope 1 - 2)	tCO_2e	89,985	72%	86%	110,207	59%
Carbon intensity (scope 1 - 2)	tCO_2e/€m turnover	68	83%	86%	76.8	85%
Total carbon intensity (scope 1 - 2 - 3)	tCO_2e/€m turnover	643.8	81%	0%	n.a.(*)	n.a.(*)

(*) Donnée scope 3 non recalculée au pro forma suite au changement de prestataire.

The table below shows the breakdown of the carbon intensity (Scopes 1 and 2) of the Group's equity portfolio by sector, compared with a representative equity market ETF:

	Equity portfolio as of 31/12/2024			Equity market ETF		Equity portfolio as of 31/12/2023		
	Sectoral intensity (Scopes 1 – 2)	Weight	Sectoral contribution (Scopes 1 – 2)	Sectoral intensity (Scopes 1 – 2)	Weight as of the end of April 2025	Sectoral intensity (Scopes 1 – 2)	Weight	Sectoral contribution (Scopes 1 – 2)
Utilities	897	3%	35%	812	4%	961	3%	42%
Industrials	586	3%	28%	443	6%	465	3%	19%
Basic materials	74	12%	13%	105	18%	73	13%	12%
Financials	239	2%	7%	216	3%	197	3%	9%
Oil and gas	6	43%	4%	6	25%	8	34%	3%
Consumer services	18	14%	4%	8	12%	20	16%	4%
Consumer goods	28	8%	3%	22	16%	27	11%	4%
Telecommunications	18	8%	2%	24	7%	18	9%	2%
Healthcare	37	4%	2%	52	3%	62	4%	3%
Technology	32	3%	2%	31	4%	35	3%	2%

Despite **more varied sector-level results** than those observed in the corporate bond portfolio, the **overall positive trend in the equity portfolio** reflects a r**eduction in emissions** from historically high-emitting sectors, particularly:

- **Basic materials:** –6.7% (from 961 to 897 tCO_2e/€m)
- **Utilities:** –5% (from 615 to 586 tCO_2e/€m)

Though **lightly weighted** (about 3% each), these two sectors **alone account for more than 60% of the total carbon intensity** of the equity portfolio, confirming their **structural role** in shaping the portfolio's carbon profile.

By contrast, **heavily weighted sectors** such as **financials (43% of the portfolio)** and **technology (14%)** show **very low Scope 1 and 2 intensities** (6 and 18 tCO_2e/€m, respectively), **limiting their contribution to overall emissions.**

Lastly, the **portfolio's average carbon intensity remains lower than that of a representative market equity ETF**, particularly across several key sectors (technology, consumer goods, healthcare).

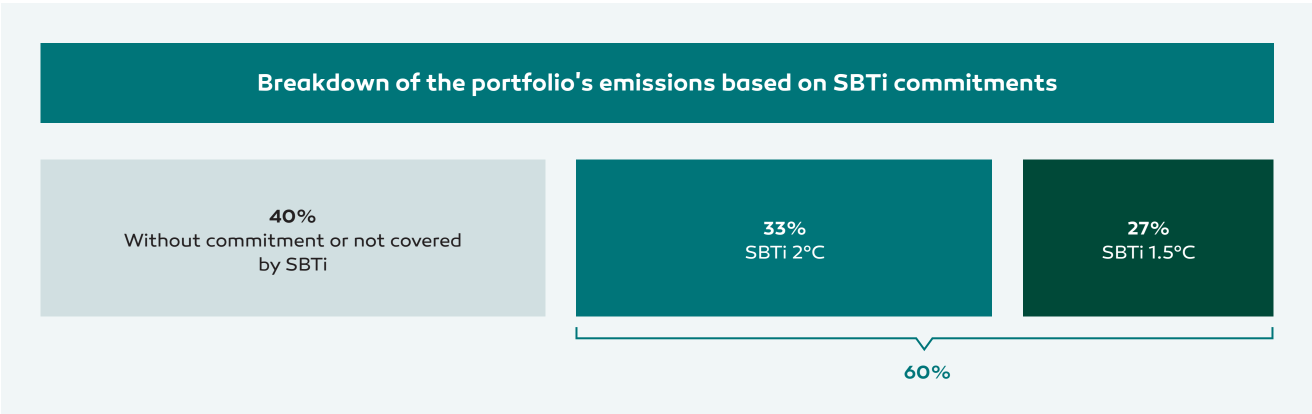
› FORWARD-LOOKING ANALYSIS: ASSESSING THE CREDIBILITY OF CORPORATE TRANSITION PLANS

As an extension of its work on carbon intensity assessment, the Group integrated in 2024–2025 a new analytical dimension aimed at evaluating corporate transition plans. This assessment relies both on external data that classify the science-based alignment of issuers' climate trajectories, and internal work conducted by Groupama AM to develop its own analysis framework for issuer transition plans.

Studying the climate alignment trajectories of portfolio issuers

To complement its measurement of portfolio carbon intensity, the Group draws on the approach developed by the **Science-Based Targets initiative** (SBTi). This methodology allows not only for the evaluation of companies' **current emissions**, but also their **decarbonization trajectories** and the **credibility of their long-term commitments**. Unlike a simple snapshot of emissions, this approach introduces a **forward-looking dimension** that is essential for a long-term investor.

SBTi also offers another key advantage: companies must **voluntarily commit** to the process by submitting their emissions reduction targets for **external validation**. Thus, a company that is aligned with the SBTi demonstrates a **clear intent to contribute to the climate transition**.



The Group's portfolio reflects this commitment, with 60% of associated Scope 1 & 2 emissions (in tCO_2e/€m turnover) covered by an SBTi commitment. More specifically, the **decarbonization trajectory of 29% of assets**, corresponding to **27% of the portfolio's intensity**, is aligned with a **1.5°C-compatible pathway**, another **33% of emissions** (linked to **8% of assets**) align with a trajectory compatible with a **2°C or "well below 2°C" scenario**, and the remaining **40%** correspond to companies that either **have not made an SBTi commitment** or **operate in sectors not yet covered** by an SBTi methodology.

This approach **reinforces the robustness** of our climate strategy by identifying the **most committed actors**.

GAM's methodology for analysing corporate's transition plans

Groupama Asset Management's internal methodology aims to assess the **credibility**, **robustness**, and **effective implementation** of companies' decarbonization commitments.

The analysis is based on a structured framework with five key pillars:

1. **Past and current performance;**
2. **Ambition of the emissions reduction targets;**
3. **Decarbonization levers being used;**
4. **Governance of climate-related issues;**
5. **Expected financial impacts.**

A dedicated tool has been developed to guide analysts in applying this evaluation grid, incorporating market best practices. An initial pilot phase validated the relevance of this approach while also highlighting the importance of **sector-specific adjustments**.

A set of key indicators has also been selected, drawing on **MSCI** and **Clarity AI** databases, to ensure a balance between **analytical ambition**, **regulatory compliance**, and **operational feasibility**.

In 2025 and 2026, the Group will rely on this methodology to analyse the credibility of climate transition plans of the most carbon-intensive issuers in its portfolio.

2. SOVEREIGN BOND INVESTMENTS

› ASSESSMENT OF THE SOVEREIGN PORTFOLIO'S CARBON FOOTPRINT

Sovereign debt represents nearly **37% of total assets**, making it a key component of the Group's portfolio. The **Net-Zero Asset Owner Alliance** (NZAOA) requires members to assess the carbon footprint of sovereign bonds. The recommended methodology is based on the current version of the **PCAF Global GHG Accounting and Reporting Standard for the Financial Industry**. This approach attributes a share of a country's total carbon footprint **without isolating the specific contribution of the government's own operations**. This raises the issue of **potential double counting** with the carbon footprint assigned to private issuers and highlights the **need to harmonize measurement methodologies** in order to aggregate contributions in a consistent and meaningful way.

To date, the **NZAOA has not set quantitative targets for sovereign debt, due to methodological and structural constraints**. Nevertheless, since **sovereign bonds play a key role in institutional portfolios**, their evaluation should eventually go beyond emissions measurement alone. For the time being, the **NZAOA recommends using the ASCOR framework** (Assessment of Sovereign Climate Opportunities and Risks) to assess the **climate alignment of sovereign issuers**, while continuing to explore options for **incorporating a medium-term target**.

	National GHG emissions / GDP (territorial + imported) tCO_2/€m GDP	Coverage rate (in %)
Sovereign bond portfolio 2024	211.8	96%
Sovereign bond portfolio 2023	232.1	93%

› ASCOR EVALUATION OF THE GROUP'S SOVEREIGN BOND PORTFOLIO

As part of its NZAOA commitment, the Group participated in the **Sovereign Debt Working Group**, which aims to define a methodology for assessing sovereign bond portfolios held by members. This work led to the **application of the ASCOR methodology** to the **Group's sovereign bond portfolio**.

As of **December 31, 2024**, the **sovereign portfolio** (excluding Europe and supranational issuers) amounted to **€19.84 billion**, covering **20 of the 70 countries evaluated by ASCOR**. With an **average score of 0.640**, higher than the average for all countries assessed **(0.44)**, the portfolio ranks in the **first quartile**.

This strong performance is primarily due to the Group's **high exposure to Europe**, with **France representing over 50%** of the sovereign portfolio. France is also the **second-highest ranked country** among the 70 assessed by ASCOR.

According to the ASCOR evaluation, **France demonstrates strong overall climate performance**. It benefits from an **advanced regulatory framework**, **structured climate governance**, an electricity mix that is **92% low-carbon**, an **explicit carbon price** through its participation in the **EU Emissions Trading System** (EU ETS), which covers **61% of national emissions**, **defined sectoral strategies**, particularly in **industry and energy**. However, **fossil fuel subsidies remain significant** (0.58% of GDP) with **no phase-out timeline**, and the **37% emissions reduction target by 2030** is **not fully aligned** with a **1.5°C trajectory**.

ASCOR highlights contrasting climate transition performances between **Italy (24% of sovereign bond investments)** and **Spain (11%)**. **Spain** achieves a **strong climate performance**, with a **score of 0.638**, ranking **12th** overall. This reflects a notable decarbonization commitment, supported by a **transitioning energy mix** and **structured climate policies**. In contrast, **Italy** scores **0.471**, ranking **33rd**, indicating **more limited efforts** and **slower progress** in implementing effective climate policies.

That said, the Group acknowledges certain **limitations of the ASCOR methodology**, including its **binary ("Yes" or "No") approach**, which can oversimplify complex realities, and its **reliance on public data**, which may be incomplete or outdated.

THE ASCOR TOOL

This **independent and publicly available tool** is designed to assess **countries' climate policie**s and their alignment with the transition to a **low-carbon economy**. It is based on **three pillars** and **13 themes**, covering a total of **39 indicators** — primarily **yes/no questions**, supplemented where available with **quantitative metrics**.

The ASCOR assessment uses the **World Bank's income classification** to group countries by income level: **high-income countries** (HI), **middle-income countries** (MI), **low-income countries** (LI). Based on this categorization, some countries are **exempt from certain indicators or metrics**. For example, **low-income countries are not assessed on emissions mitigation criteria**.

The **ASCOR database** is then used to assign a **score to each country**, applying the methodology developed by the **NZAOA**. Each indicator is **converted into a binary variable**, and an **aggregate result** is calculated from these values.

The evaluation follows the Equal Area Weight (EAW) approach, which consists of calculating an **intermediate score** for each pillar, then taking their average to obtain the **final country score**.

Pillar 1:
Emission Pathways

TE1: Emission Trends
TE2: 2030 Targets
TE3: Carbon Neutrality Targets

Pillar 2:
Climate Policies

PC1: Climate Legislation
PC2: Carbon Pricing
PC3: Fossil Fuels
PC4: Sectoral Transitions
PC5: Adaptation
PC6: Just Transition

Pillar 3:
Climate Finance

FC1: International Climate Finance
FC2: Transparency of Climate Costs
FC3: Transparency of Climate Expenditures
FC4: Opportunities in Renewable Energy

3. REAL ESTATE AND FOREST ASSETS

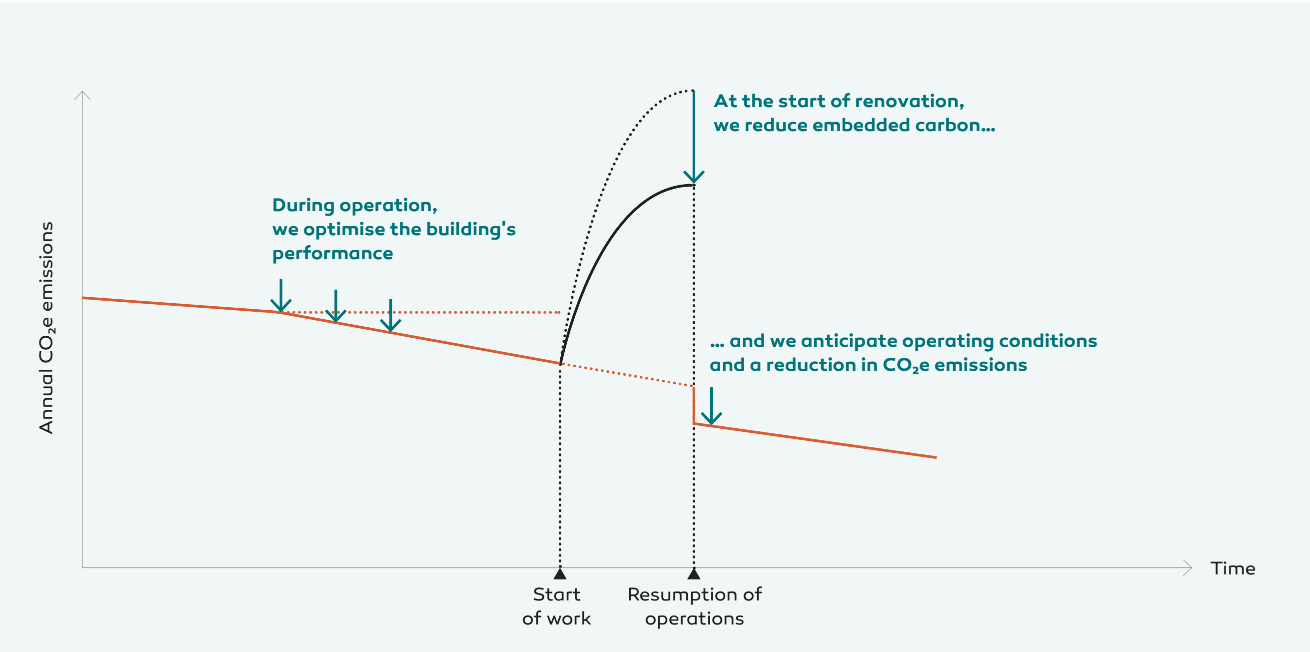
› INVESTMENT REAL ESTATE PORTFOLIO

Groupama Immobilier is fully committed to meeting the CRREM trajectory targets by 2030. This commitment applies to non-residential investment properties managed by Groupama Immobilier for which actual energy consumption and GHG emissions data are available.

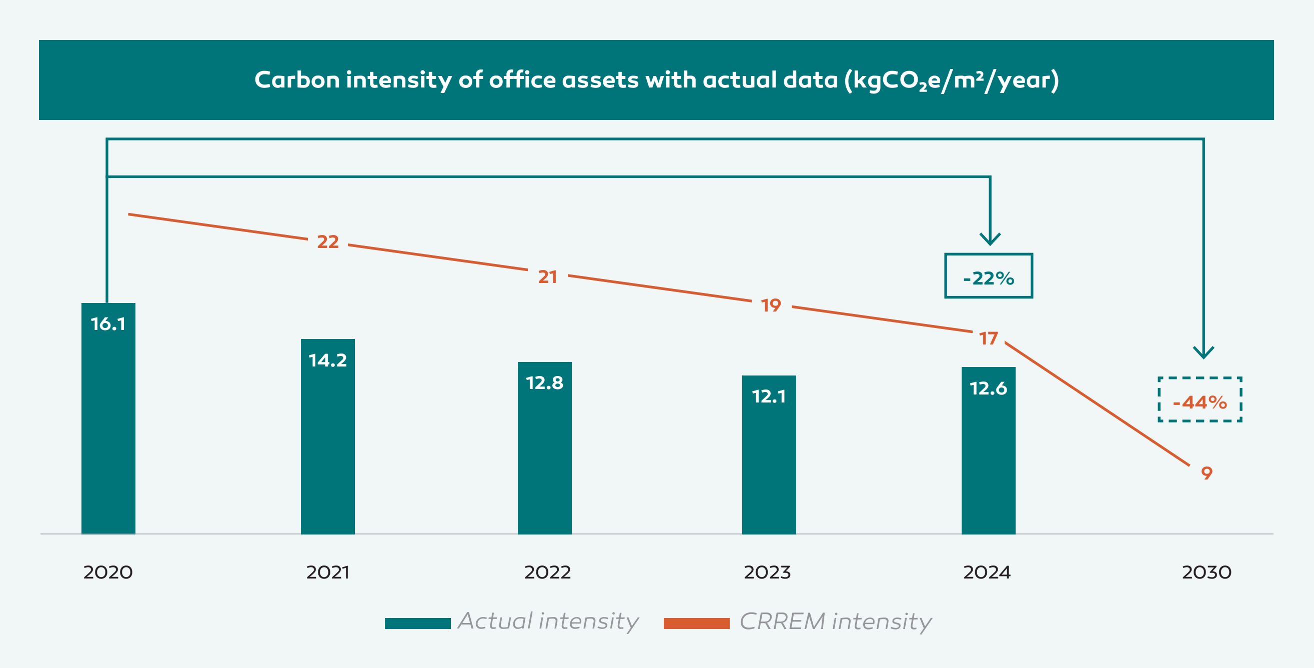
The **GHG emissions reduction strategy** of Groupama Immobilier focuses on: **operational carbon** (emissions from building operations), and so-called **"embodied carbon"**, generated during the **manufacturing of materials and equipment** used for renovation work.

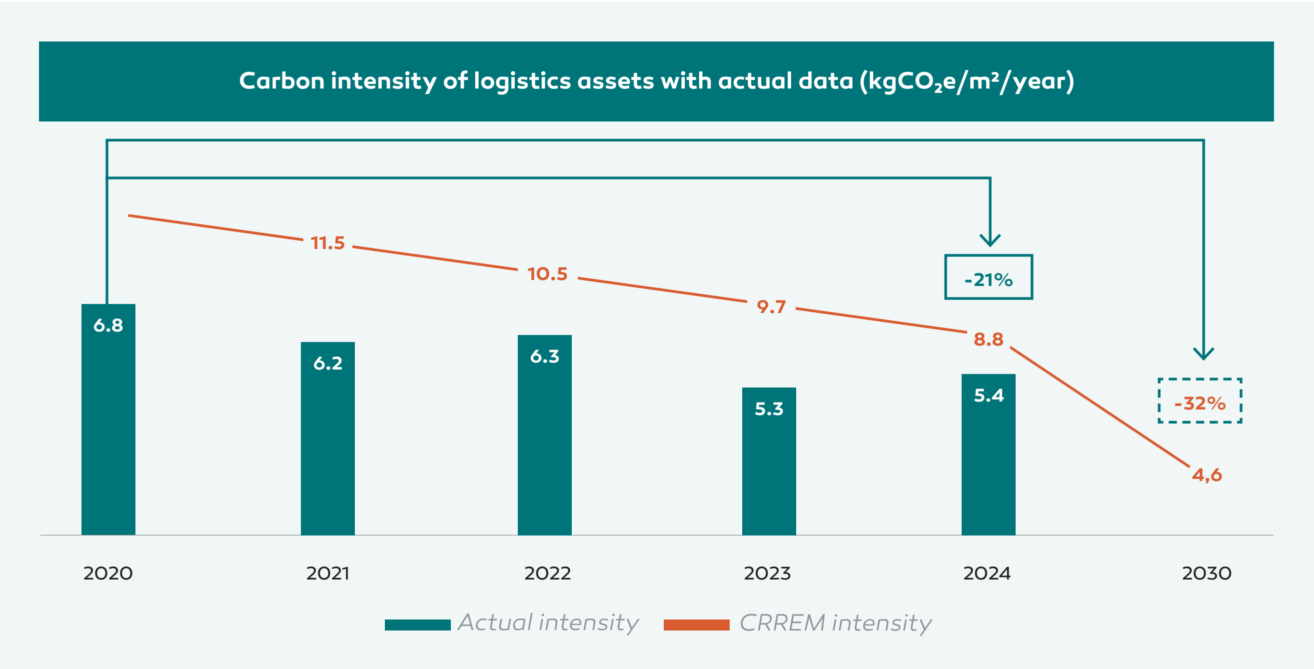
The **collection of energy consumption and carbon emissions data** is a **crucial first step** in the goal of reducing emissions.

By the end of 2024, **actual data** — including **meter readings** and **modeled estimates for missing data** — covered **91% of the assets (by value)** subject to the **Tertiary Decree**, representing **87% of energy consumption** and **90% of carbon emissions** for assets in this category. For office properties subject to the Tertiary Decree, where the Group has access to actual data, energy performance actions have proven effective:



For office properties subject to the Tertiary Decree, where the Group has access to actual data, energy performance actions have proven effective: the carbon intensity of tertiary assets decreased by 22% between 2020 and 2024, and has consistently outperformed the CRREM target trajectory.





This performance improvement is the result of several actions, including:

- **Deployment of building automation and control systems;**
- Reinforcement of **efficiency measures** in close collaboration with building operators: equipment maintenance and replacement;
- When applicable, **energy audits** to gain a deeper understanding of the asset;
- I**mprovement of the bioclimatic quality** of the building envelope: window replacements, insulation of opaque surfaces, installation of solar shading, etc.;
- **Preparation for transition** to low-carbon energy sources: connection to urban heating/cooling networks, replacement of gas boilers with heat pumps, etc.;
- **Commitment to energy-saving initiatives.**

2025 IMPROVEMENT PLAN

Groupama Immobilier aims to increase the coverage of actual data through two main levers:

- The rollout of the energy consumption and GHG emissions monitoring platform across office buildings with a surface area of less than 1,000 m²;
- The implementation of data collection improvement actions via renovation plans.

› FOREST PORTFOLIO

CO_2 storage

Through photosynthesis, forests capture atmospheric CO_2 and store it in trees and soil.

As of the end of 2024, the carbon stock managed by Société Forestière Groupama **exceeded 11 million tonnes**, an increase of approximately 120,000 tonnes compared to the previous year.

Studies are underway to better asses carbon storage in forests and demonstrate its positive role in combating the greenhouse effect.

4. OTHER ASSET CLASSES

> The Group will progressively integrate new asset classes, in line with the recommendations and timeline set by the NZAOA.

In 2025, the Group must measure the carbon emissions of direct private equity investments.

In 2026, the Group must set a decarbonization target for its direct private equity holdings, and measure carbon emissions of the following remaining asset classes:

- **Infrastructure,** held as equity or debt;
- **Real estate,** held as equity or debt;
- **Private debt;**
- **Commercial mortgage loans.**

B. SHAREHOLDER ENGAGEMENT AS A PILAR OF THE GROUP'S NZAOA APPROACH

At the Group's request, **Groupama Asset Managemen**t (GAM) has, since spring 2023, structured its **engagement with the most carbon-intensive** issuers around an **action plan** based on the following levers:

- Identification of the most carbon-intensive issuers in the portfolios;
- For each issuer, a review of engagement types (collaborative or individual) was conducted, and an engagement objective was defined. For example, requesting the issuer to submit an ambitious climate strategy to a shareholder vote via a "Say on Climate";
- In terms of expectations, the climate strategy presented by targeted companies must include quantitative emissions reduction targets, at a minimum for Scope 1 and 2, aligned with the Paris Agreement or targeting carbon neutrality by 2050. These targets must be supported by short-, medium-, and long-term objectives.

The table below summarizes the excerpt of votes and engagement actions carried out in 2024 on climate-related topics:

Vote	Number of votes against related to climate and concerning the board of directors	71
	Number of votes against related to climate and concerning executive remuneration	69
	Number of votes against related to a Say on Climate	6
Dialogue and engagement	Number of dialogues conducted on the topic of climate	87
	Number of ongoing individual engagements related to climate	10
	Number of ongoing collaborative engagements related to climate	23

This table summarizes the effective implementation of the action plan in 2024. GAM actively exercised its voting rights on climate-related resolutions, including 71 votes against board members, and 69 votes against executive compensation policies considered incompatible with climate objectives. This reflects a clear intention to link governance and executive incentives to climate transition issues.

In addition, 6 votes were cast against "Say on Climate" resolutions, highlighting a high level of scrutiny regarding the quality of climate strategies presented.

On the engagement side, GAM conducted 87 climate-related dialogues over the course of the year, complemented by 23 ongoing collaborative engagements, for example through Climate Action 100+.

As of today, 10 of the most carbon-intensive issuers in the Group's portfolios are the subject of individual engagement actions as part of the NZAOA engagement target.

The target for 2026 is to engage with 20 companies that are among the most carbon-intensive within the Group's portfolio.

The table below shows the companies with which individual engagement is ongoing:

<table>
<tr><th>Company</th><th>Engagement status</th><th>Objective</th><th>Result</th><th>Meeting in 2024</th><th>Status</th><th>Country</th></tr>
<tr><td>Enel</td><td rowspan="9">2023</td><td rowspan="4">Request for implementation of an ambitious climate strategy aligned with Groupama AM's voting policy, submitted to shareholder vote (Say on Climate).</td><td rowspan="9">Dialogue continues in 2024. Say on Climate principle not yet accepted by some (Enel, Air Liquide).

Companies still sometimes lack transparency on allocation of capex/goals by renewable energy category. Volatility of electricity prices can delay project launches. US market uncertainty is also a risk factor. So far, no committed actor has abandoned its targets.</td><td>–</td><td rowspan="9">Continued into 2025, expansion to other companies.</td><td>Italy</td></tr>
<tr><td>Arcelor Mital</td><td>✓</td><td>Luxembourg</td></tr>
<tr><td>Air Liquide</td><td>✓</td><td>France</td></tr>
<tr><td>Holcim</td><td>–</td><td>Switzerland</td></tr>
<tr><td>Endesa</td><td rowspan="5">Request for implementation of an ambitious climate strategy aligned with Groupama AM's voting policy.

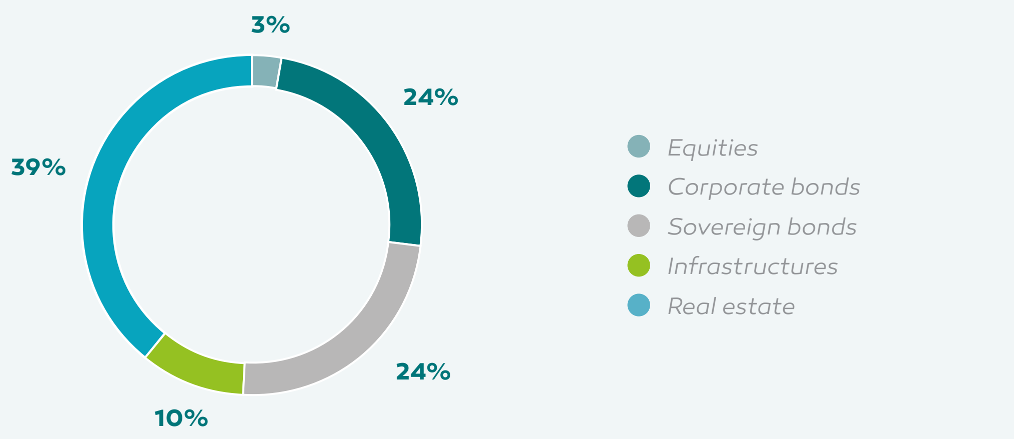
Implementation of an ambitious climate strategy with quantitative GHG reduction targets (Scopes 1 and 2 at minimum) aligned with the Paris Agreement or a carbon neutrality target by 2050, including intermediate targets (short, medium, long term).</td><td>✓</td><td>Spain</td></tr>
<tr><td>Iberdrola</td><td>✓</td><td>Spain</td></tr>
<tr><td>SSE</td><td>–</td><td>United-Kingdom</td></tr>
<tr><td>Vettenfall</td><td>–</td><td>Sweden</td></tr>
<tr><td>EDF</td><td>–</td><td>France</td></tr>
<tr><td>EDP</td><td>2024</td><td>Transparency on the renewable energy investment plan, CEO ESG KPIs, milestones for coal phase-out, and water stress remediation plan.</td><td>Dialogue initiated.</td><td>–</td><td>Meeting planned for 2025.</td><td>Spain</td></tr>
</table>

C. A SUBSTANTIAL SHARE OF THE GROUP'S SUSTAINABLE INVESTMENTS IS ALLOCATED TO GREEN INVESTMENTS

The Group has currently set a sustainable investment target, which includes both green and social investments (see Section I.E). Although the Group has not established a specific green financing target, the achievement of the sustainable investment objective is assessed through both environmental and social pillars.

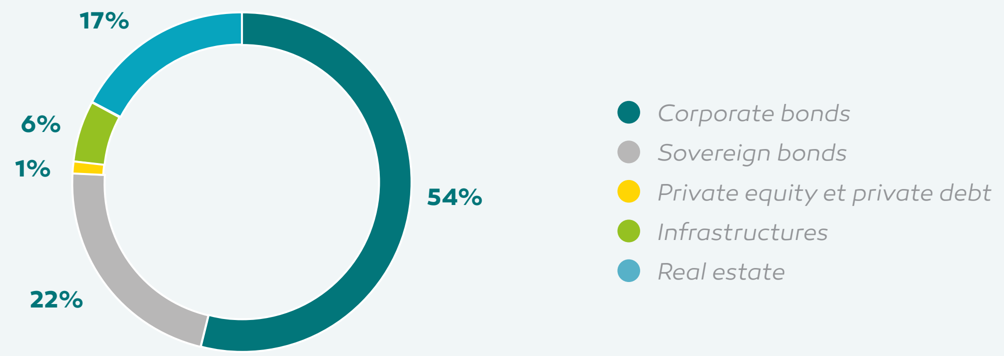
As of the end of 2024, the Group had financed a total of €5.6 billion in green investments (see definition in Section I.E), broken down as follows:

Group environmental investments as of end-2024



In fiscal year 2024, the €804 million in green financing was distributed as follows:

Additional environmental investments during 2024

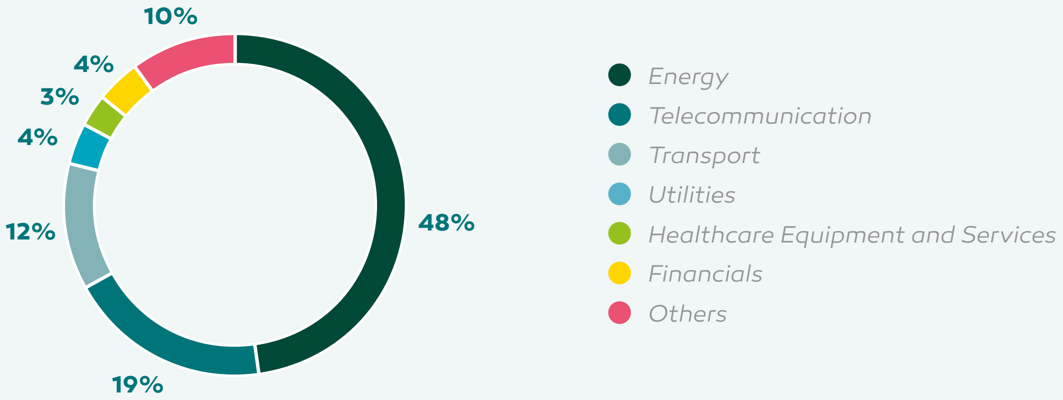


FINANCING RENEWABLE ENERGY IN INFRASTRUCTURE

Groupama aims to contribute to the energy transition by helping to fill the investment gap in the infrastructure sector. The objective is to determine a target allocation among types of infrastructure (transport, electricity storage, low-carbon infrastructure, etc.) in order to fully support financing needs in this area.

These investments are part of the Group's sustainable investment program and represent 10% of the sustainable investment portfolio as of the end of 2024. **The Group's total infrastructure portfolio is allocated as follows:**

Composition of Groupama's infrastructure portfolio as of 31/12/2024

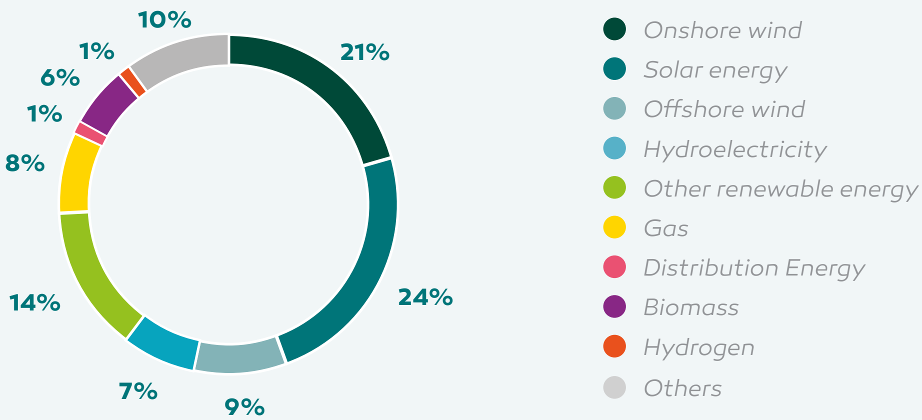


In 2024, Groupama renewed the **annual study** launched in 2022, covering all of the Group's investments to **identify its energy mix**. The results were compared to the **energy mix scenarios** from the **International Energy Agency** (IEA) that are considered **compatible with a Net Zero objective**.

As of **December 31, 2024**, the Group's **exposure to infrastructure** amounted to **€1.77 billion**, primarily concentrated in **French subsidiaries (88%)**. The scope of the study covers a total of **€1.4 billion**, representing **80%** of the infrastructure investments held by French subsidiaries.

Energy accounts for 41% of infrastructure investments. Within this segment, the financing is broken down as follows:

Energy mix of infrastructures in French subsidiaries

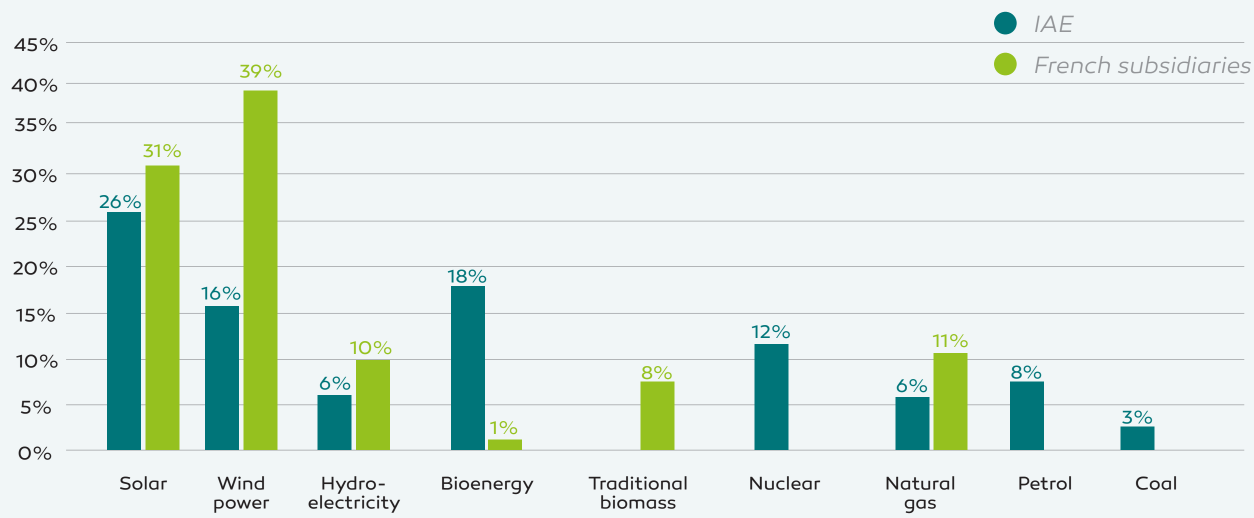


As part of its report on the **target energy mix to be achieved by 2050** to reach Net Zero, the **International Energy Agency** (IEA) highlights the **need for a massive increase** in the share of **solar energy (20-fold)** and **wind energy (16-fold)** in order to **reduce dependence on fossil fuels**, which currently account for nearly **80% of the global energy mix**.

When comparing **Groupama's energy mix (French subsidiaries)** as of **December 31, 2024** to the IEA's target energy mix, it is clear that **Groupama's portfolio aligns with IEA guidelines**, focusing on **low-carbon energy sources**, which represent **89%** of the energy mix in infrastructure investments held by Groupama's French subsidiaries.

The comparison below covers **88% of infrastructure assets** held by Groupama's French subsidiaries, excluding certain assets such as those related to **energy distribution and storage**, which are not represented.

Comparison of the energy mix of the IAE and French subsidiaries



VII. ALIGNMENT STRATEGY WITH LONG-TERM BIODIVERSITY OBJECTIVES

Progress on biodiversity in 2024

01

Expansion of the biodiversity analysis scope

In 2024, the analysis of impacts and dependencies on biodiversity was extended to all of the Group's portfolios, whereas in 2023 it was limited to the GGVie portfolio only.

02

Implementation of a biodiversity scorecard: identification of key and reliable indicators

This scorecard is intended for the Group's operational teams monitoring investments, such as DOFI and the Group's governance bodies, and it helps formalize the dialogue on biodiversity considerations with entities like GAM.

03

Training teams on deforestation

In 2024, Groupama strengthened the skills of its investment teams by providing training on issues related to deforestation.

Objectives for 2025 and 2026

01

Deploy the biodiversity scorecard

02

Continuation of analyses on water-related issues

Groupama plans to continue the work initiated in 2023 by updating in-depth analyses covering around thirty companies regarding water consumption and its impact on water quality and availability.

03

Gradual integration of deforestation-related risk analysis into the investment policy

04

Search for reliable biodiversity monitoring indicators

Groupama will continue its research efforts to identify reliable and robust monitoring indicators related to the material themes identified in the biodiversity impact and dependency analysis of the portfolio.

05

Training investment teams on water-related topics

06

Strategic engagement in the PRI SPRING initiative on deforestation

Groupama AM plans to participate in the PRI's engagement initiative on deforestation (SPRING) as a co-lead for a French company.

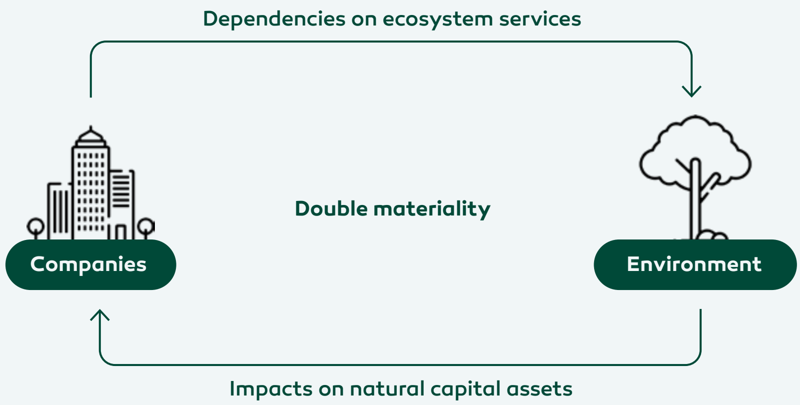
A. INTRODUCTION AND CONTEXT

Aware of the rapid decline in biodiversity, Groupama is continuing its efforts to contribute to global biodiversity objectives. This commitment reflects the Group's fiduciary responsibility, its identity as a responsible investor, and its response to the call from civil society.

The Group grounds its biodiversity strategy in the regulatory framework defined in particular by the implementing decree of Article 29 of the Energy-Climate Law (LEC) and by the Kunming-Montreal Agreement, adopted in December 2022.

BIODIVERSITY AND DOUBLE MATERIALITY: WHAT ARE WE TALKING ABOUT?

The loss of biodiversity and ecosystems threatens ecosystem services, which in turn endangers both society and businesses that depend on them — as well as investors and insurers, who rely on a functioning economy. Conversely, investors may contribute to biodiversity loss by financing issuers that exert pressure on direct drivers of biodiversity decline.



› DEPENDENCE ON BIODIVERSITY

Dependence on biodiversity refers to the fact that human and economic activities rely on essential services provided free of charge by ecosystems.

These ecosystem services, vital to many economic activities, are typically classified as:

1. **Provisioning services** (e.g., supply of raw materials);
2. **Regulating services** (e.g., pollination, water purification, climate regulation);
3. **Cultural services** (e.g., recreational, educational, or cultural functions).

To better structure the analysis, these services can also be grouped according to the natural resources and ecological functions involved—such as soil, biodiversity and ecosystems, water resources, and cultural services.

This classification allows for cross-referencing ecosystem services with major environmental issues, helping to more effectively assess associated risks.

Identifying and analysing a portfolio's dependencies on biodiversity is essential to evaluate biodiversity-related risks.

BIODIVERSITY DEFINITIONS VARY DEPENDING ON REPORTING FRAMEWORKS

1. Definition according to market frameworks

For frameworks such as the TNFD (Taskforce on Nature-related Financial Disclosures), the FBF (Finance for Biodiversity Foundation), or the SBTN (Science-Based Targets Network): Biodiversity is understood in a broad sense, closely aligned with the general concept of "Nature". It therefore encompasses a variety of environmental issues, such as natural resource management (water, air, soil), climate, pollution, and the circular economy.

2. Regulatory definition under the CSRD

The CSRD clearly defines biodiversity as a distinct environmental issue, separate from the five environmental themes established in the ESRS (climate, pollution, water and marine resources, biodiversity, and circular economy).

The biodiversity theme is broken down into four sub-themes:

- Direct drivers of biodiversity loss;
- Impact on the state of species;
- Impact on the extent and condition of ecosystems;
- Impact and dependencies on ecosystem services.

It should be noted that although biodiversity is addressed as a standalone theme, the directive emphasizes its strong interconnections with other environmental topics — particularly water and pollution.

› IMPACT ON BIODIVERSITY

Impact on biodiversity refers to the negative effects of economic activities on the diversity of living species and the proper functioning of ecosystems. These impacts are mainly expressed through habitat degradation and biodiversity loss, driven by the **five pressures** identified by IPBES (the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services).

The 5 pressures responsible for biodiversity collapse identified by IPBES

Land and sea use change	Overexploitation of natural resources	Climatic change	Pollution of water, soil and air	Spread of invasive alien species

In this report, the Group aligns with the **first approach** described above, in line with leading market frameworks. The Group therefore adopts a broad and systemic view of biodiversity, incorporating its multiple interactions with other environmental issues.

Biodiversity is indeed a fundamental pillar of climate stability, ecosystem resilience, and ultimately the long-term sustainability of investments. Aware of the rapid erosion of biodiversity and the relative immaturity of available data, the Group has implemented a gradual yet ambitious strategy aimed at progressively improving the understanding of dependencies and impacts on biodiversity across its portfolios.

This strategy is built around three complementary pillars, designed to align with the targets of the Kunming-Montreal Agreement.

The Group has committed to addressing the following three targets of the Kunming-Montreal Agreement:

Target		Integration into the Group's biodiversity strategy
Target 8	Reduction of impacts associated with climate change	• Implementation of a climate strategy aligned with the requirements of the Net Zero Asset Owner Alliance.
Target 15	Monitoring and disclosure of nature-related impacts by economic actors	• Analysis of the Group portfolio's imacts and dependencies on biodiversity. • Monitoring of the biodiversity strategy at the governance level, and training of investments experts on biodiversity-related issues.
Target 19	Funding for biodiversity	• Integration of biodiversity into the ESG analysis and issuer selection process.

To contribute to these three long-term targets, the Group activates various levers that are embedded within its biodiversity strategy. This approach is aligned with the work of the **Finance for Biodiversity Foundation**, which the Group plans to join in 2025. The Foundation's recommendations provide a shared methodological framework to guide financial actors in their biodiversity-related actions. **The Group's biodiversity strategy is therefore structured around three main pillars:**

Pillar 1: Analysis of biodiversity impacts and dependencies → **Pillar 2: Integration of biodiversity into investment policy** → **Pillar 3: Manage biodiversity-related issues and train teams**

B. PILLAR 1: IDENTIFYING KEY ISSUES FOR THE GROUP'S PORTFOLIO

> Leading industry initiatives, such as the TNFD and the Finance for Biodiversity Foundation, encourage investors to identify their main biodiversity dependencies and pressures in order to focus their biodiversity strategy on the most relevant themes.

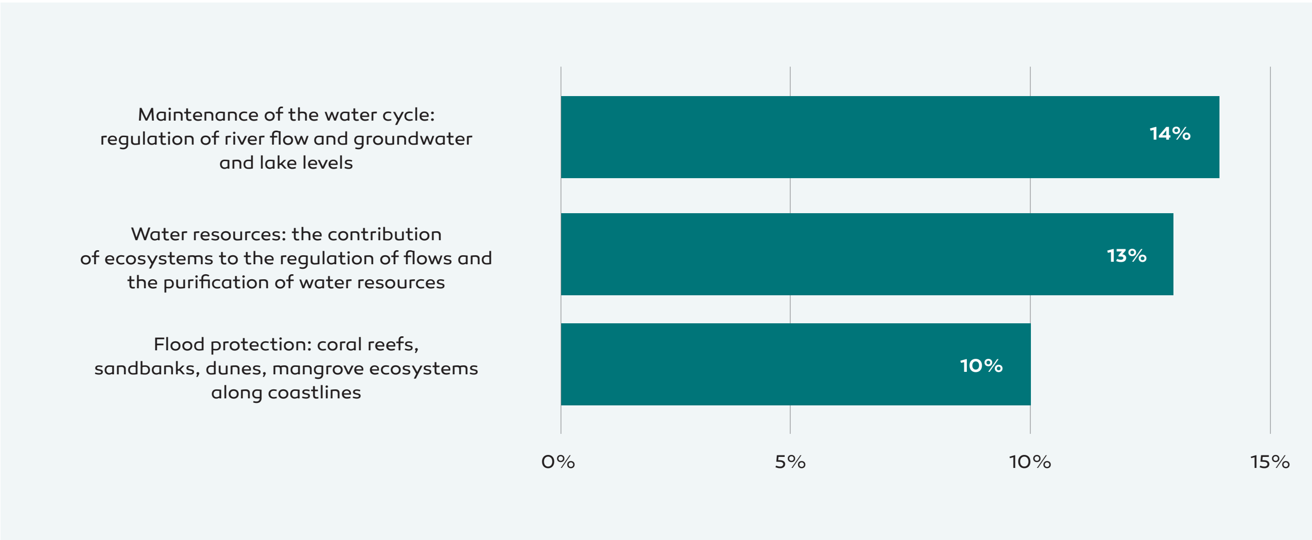
In 2024, as part of its commitment to **Target 15 of the Kunming-Montreal Agreement**, the Group repeated its impact and dependency analyses, expanding the scope compared to 2023 by extending the analysis to the Group's entire portfolio, beyond GGVie alone. To date, this in-depth analytical work is conducted on a transparent scope of equities and corporate bonds, excluding unit-linked products, using data from the ENCORE database and Iceberg Data Lab.

1. PORTFOLIO DEPENDENCIES

The Group's portfolios were analysed using data from the ENCORE database, covering €30.7 billion, representing 99% of the equity and corporate bond segment.

The analysis reveals that:

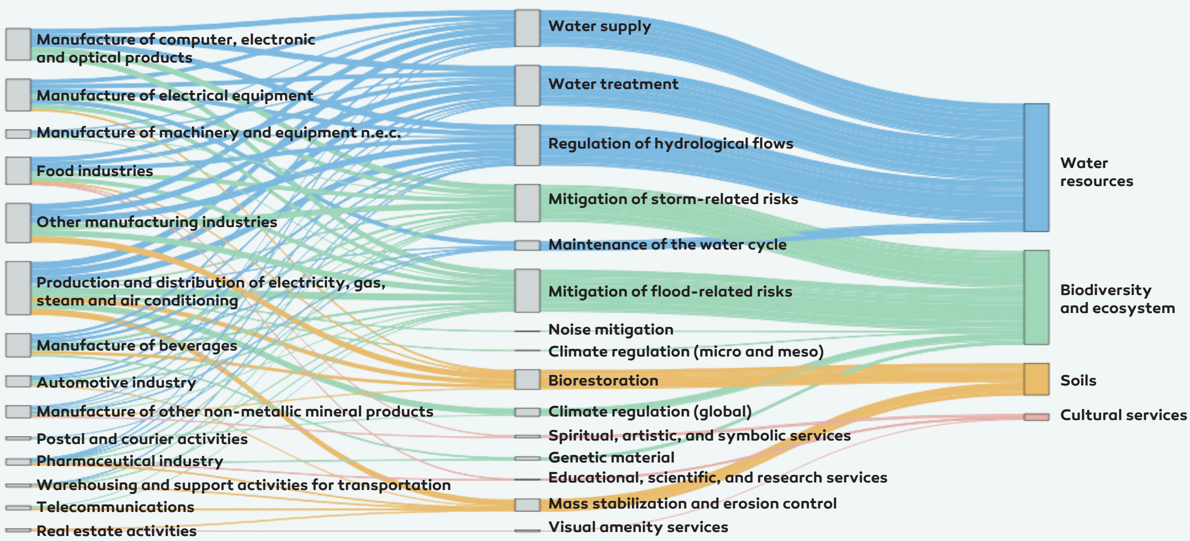
1. **28.3% of covered assets are at least highly dependent on one ecosystem service, including 24.4% that are very highly dependent.** In other words, 28.3% of the Group's assets are linked to production processes that strongly or very strongly depend on one of the 25 ecosystem services identified by the ENCORE database.
2. **Three water-related ecosystem services account for the majority of critical dependencies:**



3. **The five sectors with the most critical dependencies most represented in the Group's portfolios are:**
   - Electricity, gas, steam, and air conditioning supply;
   - Real estate activities;
   - Warehousing and support activities for transportation;
   - Beverage manufacturing;
   - Pharmaceutical industry.

The following graphic, known as a Sankey diagram, visually illustrates the moderate or higher dependency links between the various economic sectors within the Group's portfolios and ecosystem services. It highlights the fact that many sectors — such as electricity production, food manufacturing, or the production of manufactured goods — directly depend on services provided by nature, such as water supply or hydrological flow regulation. The thickness of the lines indicates the number of economic processes affected by each ecosystem service, thereby revealing the extent of these dependencies.

Sector dependencies on various ecosystem services



The update of **biodiversity dependencies**, conducted using the **ENCORE[17] database**, confirmed a strong trend already identified since 2022: the Group's portfolios remain **heavily dependent on water-related ecosystem services,** representing **18.6% of covered assets.**

[17] The ENCORE database (Exploring Natural Capital Opportunities, Risks, and Exposures) was updated in July 2024. The number of ecosystem services and their definitions have evolved, as has the granularity of the analysis. Therefore, these analyses are not directly comparable in detail with those from last year.

THE ENCORE DATABASE

The ENCORE database (Exploring Natural Capital Opportunities, Risks and Exposures), developed by the Natural Capital Finance Alliance (NCFA), is a tool designed to help investors and companies better understand the links between economic activities and natural capital.

ENCORE enables users to identify, for each production process, two key dimensions:

- **Dependencies on ecosystem services** – the extent to which an economic activity relies on functions provided by nature (e.g., pollination, water regulation, soil fertility);
- **Pressures on natural capital** – in other words, the impacts these activities generate on ecosystems (e.g., emissions, land-use change, water pollution).

Each activity is evaluated on a five-point scale, from 1 ("very low") to 5 ("very high"). As part of Groupama's portfolio analysis, a 4/5 filter was applied, retaining only those dependencies and pressures considered high or very high.

The ENCORE database is based on a sectoral approach, using the International Standard Industrial Classification (ISIC), and currently covers 271 different economic activities.

ENCORE

2. PORTFOLIO IMPACTS

In 2024, the Group conducted a more in-depth analysis of its portfolio's biodiversity impacts using three sources:

- Exposure to high-impact sectors according to the ENCORE database;
- Exposure to sectors identified as priorities by the Finance for Biodiversity Foundation;
- Biodiversity footprint of the Group's portfolios, based on data provided by Iceberg Data Lab.

› SECTORAL ANALYSIS OF THE PORTFOLIO'S IMPACT ON BIODIVERSITY

In 2024, 29.2% of covered assets had at least one material[18] impact on biodiversity, including 17.6% with a very strong impact. **As with the dependency analysis, this assessment covers €30.7 billion in assets, representing 99% of the equity and corporate bond portfolio.** The distribution of material environmental impacts in the Group's portfolio is broken down as follows across the 13 pressure categories identified by the ENCORE database:

	Biodiversity				Water		Climate	Pollution			Circular economy		Sector weight (% AuM)
	Disturbances	Land use	Seabed use	Invasive species	Water use	Freshwater ecosystems	GHG	Toxic soil and water polluants	Nutrient soil and water polluants	Non-GHG air polluants	Biotic resource extraction (e.g. fish, timber)	Solid waste	
Utility services													6%
Telecommunications													5%
Real estate activities													4%
Automotive industry													3%
Manufacture of electrical equipment													3%
Manufacture of computer, electronic and optical products													2%
Programming, consulting and other IT activities													2%
Warehousing and support activities for transportation													2%
Beverage manufacturing													2%
Pharmaceutical industry													1%
Other manufacturing industries													1%
Food industries													1%
% of the portfolio with high or very high impact	14%	7%	0%	3%	1%	8%	10%	18%	4%	13%	0%	8%	

For each sector/pressure combination, the color indicates the maximum materiality level assigned to the activity by the ENCORE database:

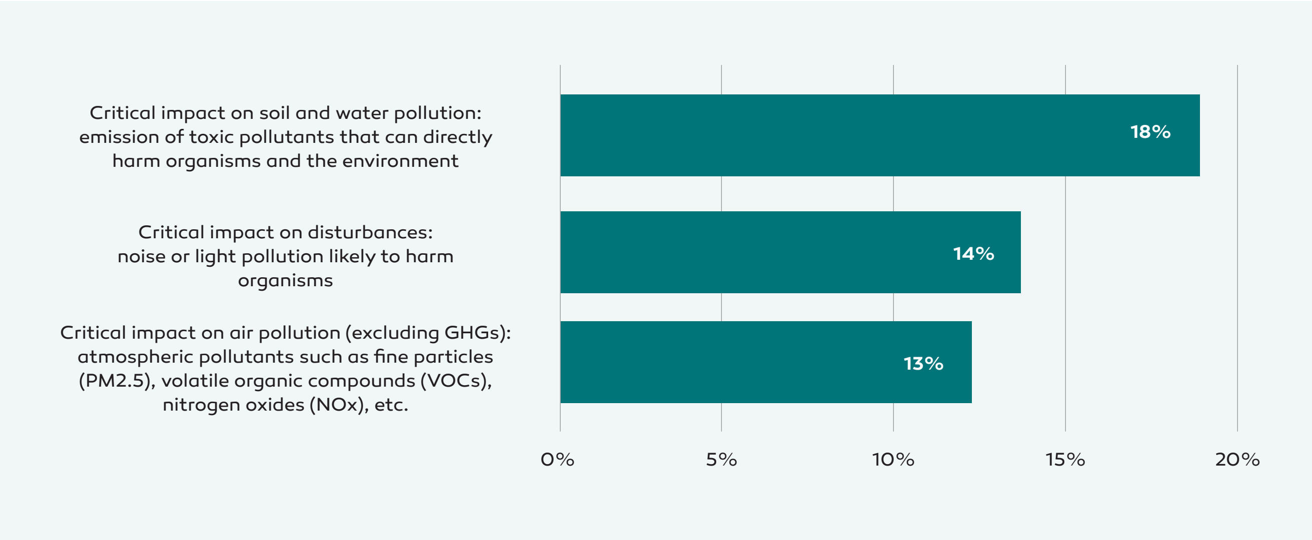
High or very high impact *Moderate impact* *Low or very low impact*

The right-hand column (% of assets) shows the weight of each sector in the covered portfolio.

The bottom row of the table summarizes the share of portfolio assets exposed to a high or very high impact for each environmental pressure. It helps identify the pressures where the portfolio has a high level of material exposure.

[18] That is to say, with a strong or very strong impact intensity according to the ENCORE database.

Three pressures account for the majority of the portfolio's critical impacts



In parallel, the Group also examined the sectors with the highest impact on biodiversity, regardless of their weight in the portfolio. **The 10 sectors listed below have the strongest impact and represent 8.47% of the covered assets:**

1. Crop and animal production, hunting, and related service activities;
2. Mining of metal ores;
3. Forestry and logging;
4. Electricity, gas, steam, and air conditioning supply;
5. Extraction of hydrocarbons;
6. Fishing and aquaculture;
7. Chemical industry;
8. Coke and refined petroleum products;
9. Metallurgy;
10. Sewage collection and treatment.

LIMITATIONS OF THE ENCORE DATABASE

While the data from the ENCORE database allow for the identification of material biodiversity-related impacts and dependencies within Groupama's portfolio, they present the following limitations:

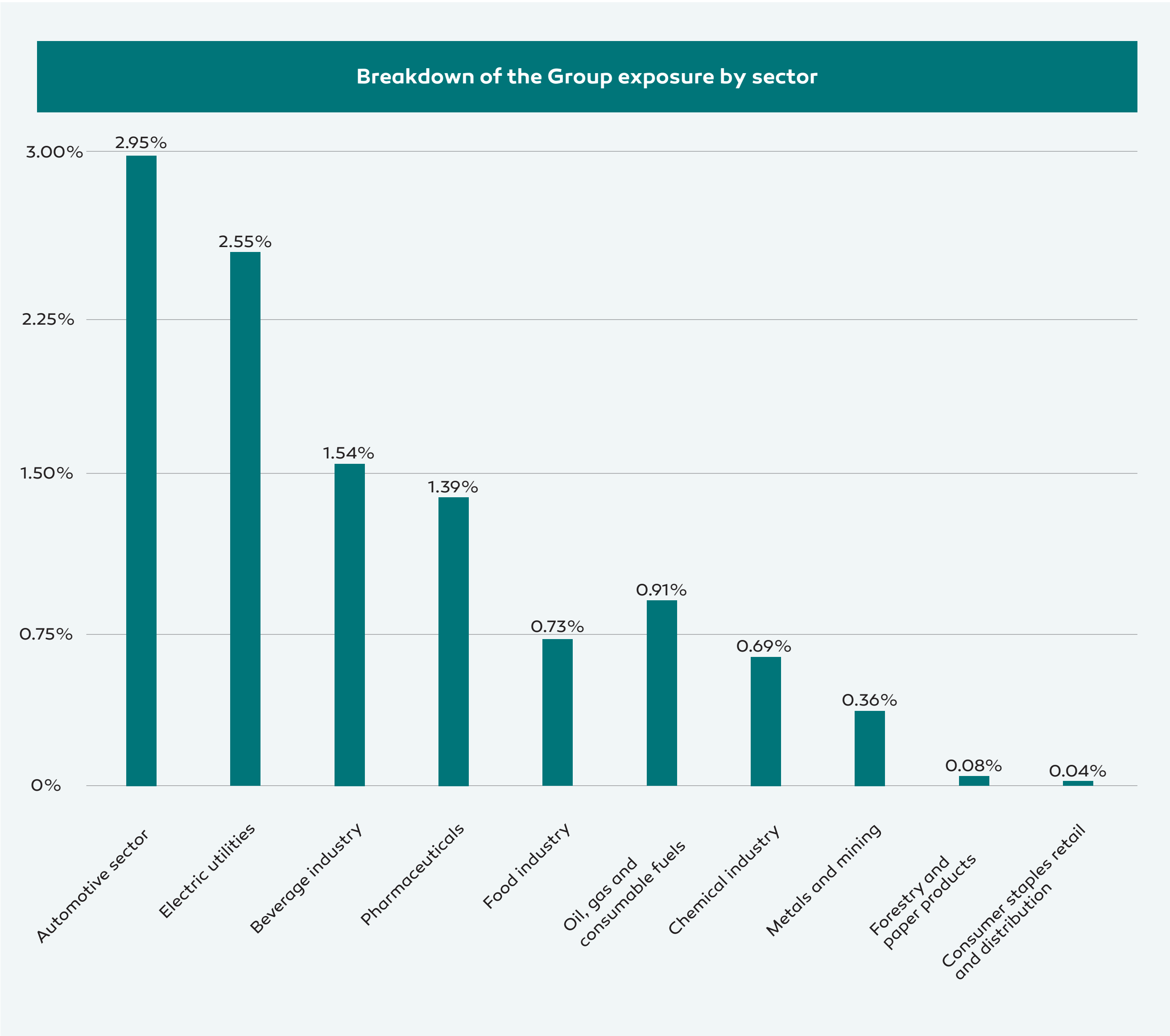
- **Sector-based data:** the analyses rely on a sectoral database that aggregates information at a global level. This may not accurately reflect regional specificities or company-level characteristics.
- **Low sectoral granularity:** the analysed portfolio was classified using NACE divisions (88 possible categories), whereas ENCORE uses ISIC codes (271 activities). This required the Group to aggregate different pressures within a single NACE sector. For example, the Utilities sector includes various sub-sectors with different impacts and dependencies, without accounting for the energy mix of electricity producers in the portfolio.
- **Qualitative assessment:** ENCORE evaluates impacts using qualitative scores (very low, low, moderate, high, very high), which may offer a simplified or subjective view of actual risks. A 4/5 filter was applied in the analyses to retain only strong or very strong pressures and dependencies.
- **Static view:** ENCORE provides a snapshot in time, without incorporating dynamic changes or future trajectories (e.g., increasing climate impacts or evolving regulations).
- **Scientific assumptions:** The models used in the ENCORE database are based on scientific assumptions, which may vary depending on the sources or methodologies used to establish links between economic activities and ecosystems.

› EXPOSURE TO PRIORITY SECTORS ACCORDING TO THE FINANCE FOR BIODIVERSITY FOUNDATION

Continuing the work initiated in 2022, Groupama once again assessed the share of its investments exposed to sectors with high biodiversity relevance:

- **10 sectors have been identified as priority sectors** by the Finance for Biodiversity Foundation, accounting for approximately 30% of the market capitalization of the MSCI ACWI index and 70% of its biodiversity footprint.
- In 2024, it was found that **11.24% of the Group's portfolio** is invested in companies belonging to at least one of these priority sectors (compared to 9.65% last year).

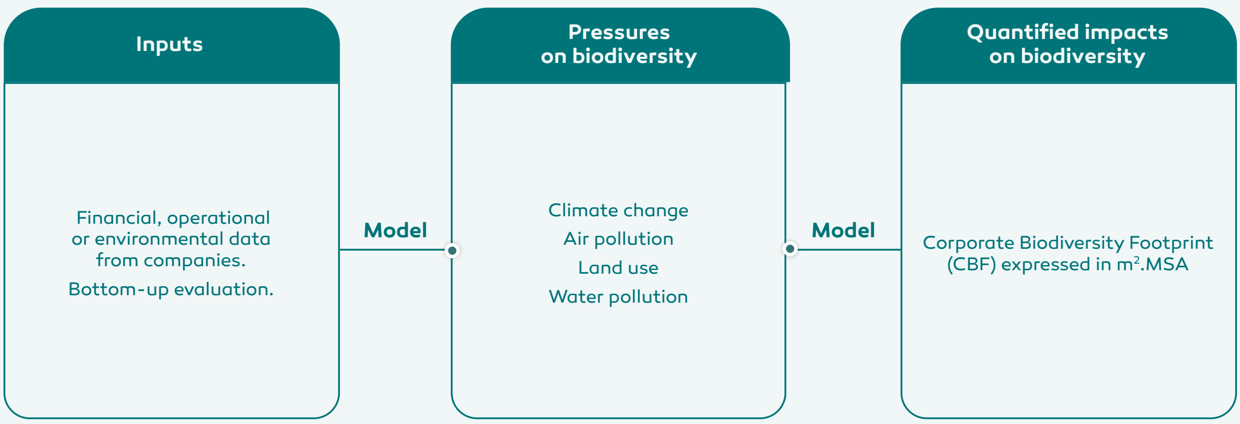
The graph below shows the breakdown of exposure by sector.



› BIODIVERSITY FOOTPRINT: DIFFICULTIES IN USING IMPACT DATA AT THE ISSUER LEVEL

To identify the **best-positioned issuers** regarding their most **material biodiversity issues** — and to be able to translate biodiversity analyses into **investment decisions** — the Group has continued its work on analysing **biodiversity footprint data**. Developed by data provider **Iceberg Data Lab,** the **Corporate Biodiversity Footprint** (CBF) provides a **quantitative footprint** for a given issuer, reflecting the extent to which **ecosystems affected by the company's activities** have been **degraded**.

Simplified model of the Corporate Biodiversity Footprint (CBF)



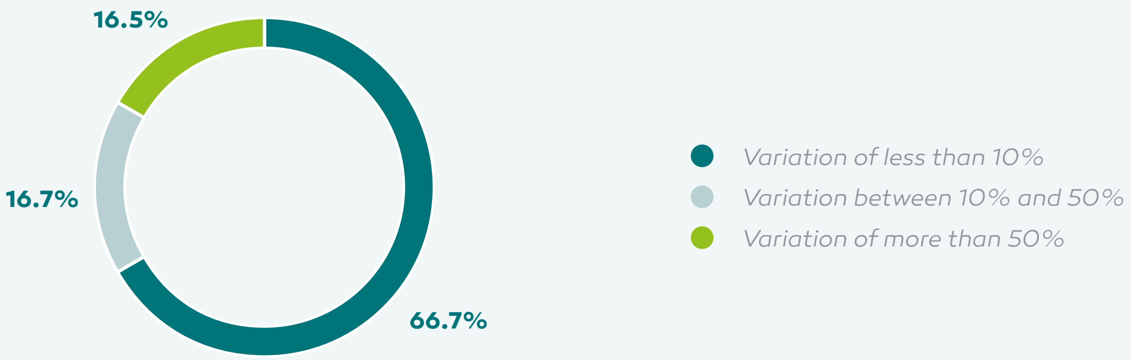
Biodiversity footprint data serve to complement issuer-level impact analyses carried out using ENCORE data. The benefit is twofold:

1. It includes the value chain (Scope 3) in impact assessments;
2. It provides issuer-specific detail.

However, analyses conducted in 2024 revealed significant fluctuations compared to the previous year, highlighting both the limitations of the CBF tool and the challenges related to data stability:

- The biodiversity footprint of 46% of companies included in the analysis **changed between 2023 and 2024;**
- Over 30% of the assets showed a variation **greater than 10%**.

Breakdown of the Group's covered assets according to the variation in CBF 2024 vs. 2023



More specifically, the Group initial objective was to complement the sector-level results obtained using the ENCORE database with a more granular analysis — i.e., at the issuer level — using the CBF. The goal was to build a robust analytical model that would ultimately allow for more precise monitoring of the Group's investment impact on biodiversity.

To that end, the Group calculatedthe rate of change in the CBF scores of issuers operating in sectors with the highest impact scores according to the ENCORE database:

Sectors with the highest impact according to ENCORE	Average rate of change in CBF 2024 vs. 2023 of issuers in the portfolio
Animal production, hunting and related service activities	217%
Mining of metal ores	60%
Production and distribution of electricity, gas, steam and air conditioning	148%
Extraction of hydrocarbons	22%
Chemical industry	113%
Coke and refined petroleum products	57%
Metallurgy	86%
Sewage collection and treatment	2%

Once again, the variations were too significant to allow for meaningful interpretation of the results provided by the data provider, let alone their use in a portfolio management approach.

As the CBF is based on evolving models that aim to reflect the most up-to-date understanding of the various pressures analysed, it presents several methodological limitations (see box below).

These methodological limitations, combined with the high year-on-year variability, currently prevent the Group from using this data as a monitoring and management tool for its biodiversity-related long-term alignment strategy.

As a result, Groupama has decided not to publish the results for these indicator this year.

› CONCLUSION: DEFINING PRIORITY THEMES FOR THE GROUP'S BIODIVERSITY STRATEGY

Given the limitations mentioned above, and in order to identify the **priority themes** of its biodiversity strategy, the Group has chosen to **rely primarily on the results of impact and dependency analyses** based on data from the **ENCORE database**, which has proven to be more stable over time.

The **sectoral analysis** conducted on the Group's portfolio confirms the **two priority themes** identified since 2022: **water** and **deforestation**. The theme of pollution also emerged from these analyses.

These **three themes** — **water**, **deforestation**, and **pollution** — have thus been integrated into the **biodiversity scorecard** and will be **closely monitored in the coming years** (see Section D).

LIMITATIONS OF THE CBF

Partial scope
The methodology used by the CBF primarily covers terrestrial biodiversity, but only partially addresses marine biodiversity.

Dependence on data availability
The approach relies on production, consumption, and pricing data required to power an Input/Output model. In the absence of national-level sector data, regional or global data are used, which can reduce the accuracy of the analysis.

Partial coverage of pressure factors
Some drivers of biodiversity loss are not yet modeled due to a lack of robust methodologies:

- **Invasive species:** this factor remains difficult to model, as it requires data on species distribution, human-related movements, and complex interactions with local ecosystems.
- **Natural resource consumption:** the impact on biodiversity depends on many factors such as resource availability, renewal rates, and local dependency patterns.

C. PILLAR 2: OPERATIONAL LEVERS TO DEPLOY THE BIODIVERSITY STRATEGY IN THE INVESTMENT POLICY

1. INTEGRATION OF BIODIVERSITY INTO ESG ANALYSIS

› LISTED COMPANIES

The environmental rating developed by Groupama Asset Management for listed companies incorporates biodiversity loss issues through:

- **The "Business Model Evolution" pillar**, which includes indicators such as the NEC (Net Environmental Contribution) and PAIs (Principal Adverse Impacts) on waste, biodiversity, water, air quality, and climate—all key issues under the Kunming-Montreal Agreement;
- **The "Natural Capital" pillar**, which also partly relies on the NEC.

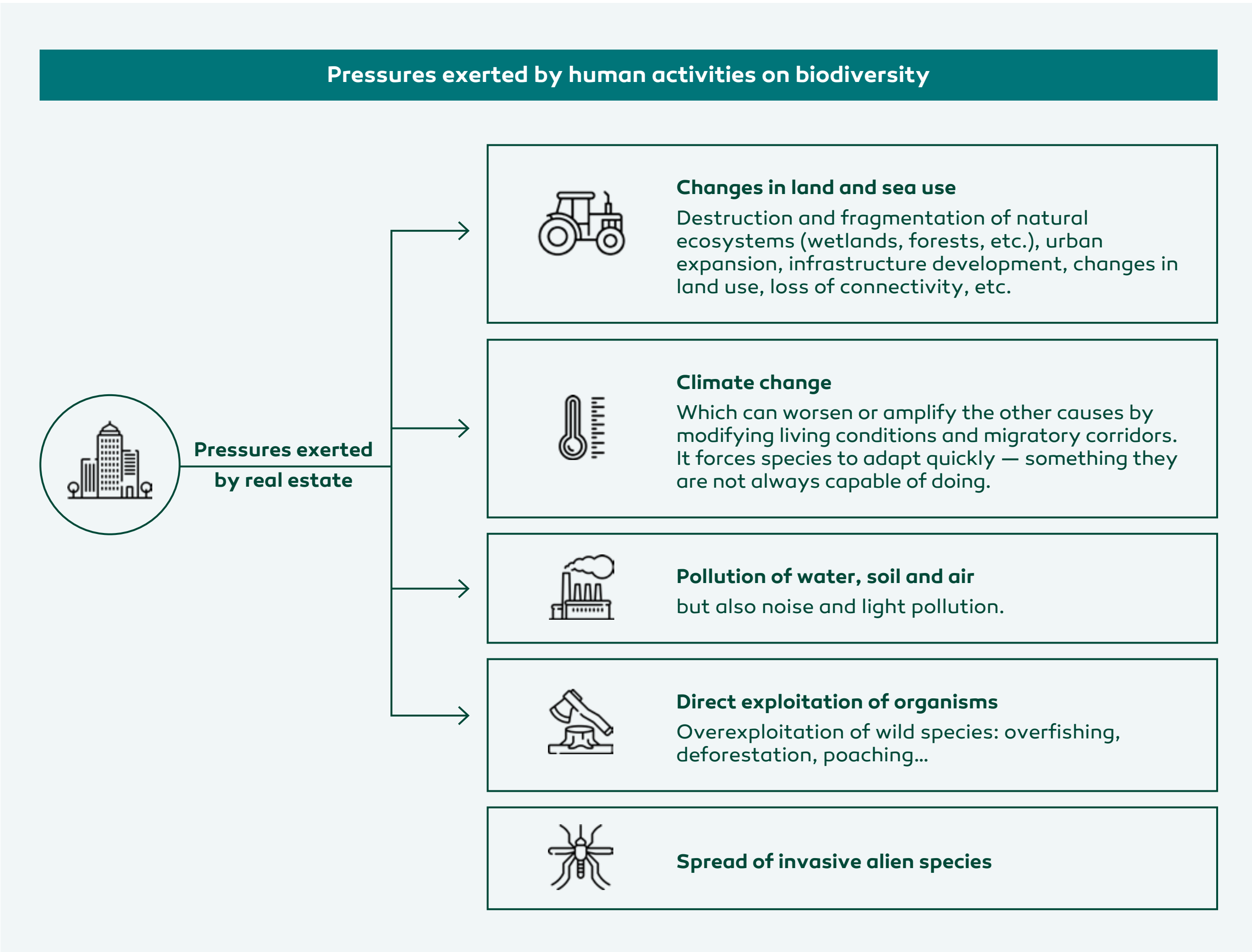
› SOVEREIGN ISSUERS

The "Environment" pillar is considered a source of long-term growth in the Country Risk rating. It includes issues related to climate change and biodiversity. The latter is assessed using data on soil quality, such as forest area (as a percentage of land area), fertilizer use (in kilograms per hectare of arable land), urbanization rate (as a % of the total population living in urban areas) and natural resource depletion (as a % of Gross National Income). However, there are currently few up-to-date indicators available to assess water quality. All data is sourced from the World Bank.

› REAL ESTATE ASSETS

Measuring the pressures exerted by the real estate portfolio on biodiversity

The construction and real estate sector contributes directly or indirectly to four key pressures caused by human activity on biodiversity.



Groupama Immobilier is implementing actions to assess the pressures its activities exert on biodiversity:

1. **For asset renovations,** an ecologist is assigned to each major renovation project and conducts a biodiversity audit at the start of the project. This expert then supports the project management team and contractors to avoid or reduce biodiversity impacts.
2. **For operational assets,** the analysis relies on two elements:
   - An **initial evaluation** of each asset using a **"biodiversity scoring grid"** composed of 27 quantitative criteria, providing visibility on the biodiversity measures implemented (or not) for each asset. This scoring helps **identify priority assets** for which more in-depth analysis can be launched, summarizing strengths, opportunities, threats, and weaknesses from audit campaigns. The grid is built using input data from the **R4RE platform** and assessments by an ecologist on site. It considers **ecological management, use of outdoor spaces**, and the potential for **tenant engagement**.
   - **Territorial sensitivity assessment:** In 2024, Groupama Immobilier developed a **robust methodology** to measure, enhance, and track biodiversity performance.

This dual assessment helps identify assets with high biodiversity risk or those with a favorable context for improvement, leading to expert visits and an action plan.

Deployed in 2025, this method assesses territorial biodiversity sensitivity by cross-evaluating pressures and ecosystem conditions using data from the OID's BIODI-Bat tool:

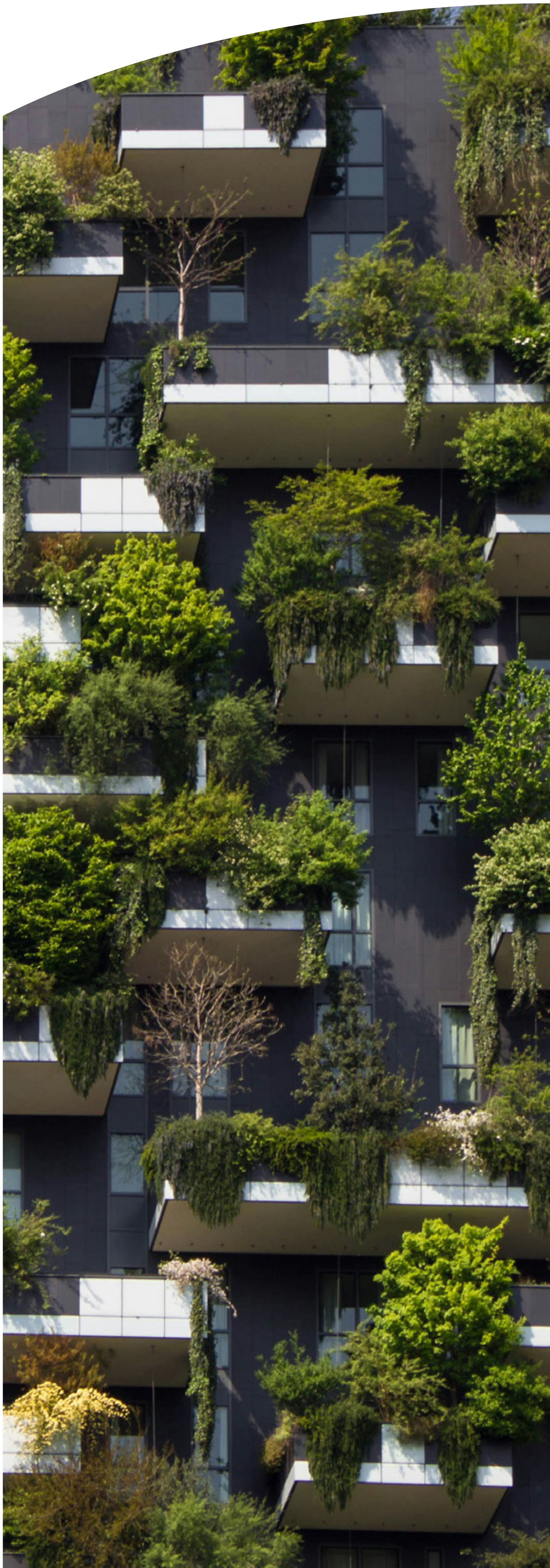
- **The pressure indicator** assesses biodiversity degradation drivers;
- **The condition indicator** represents ecosystem quality.

The biodiversity grid is then used by an ecologist to evaluate the actual performance of the asset and to measure the impact of implemented biodiversity measures.

Integration of biodiversity in fund selection

For assets invested through non-dedicated funds (i.e., open-ended listed funds or unlisted funds), five ESG analysis questionnaires have been in used, based on asset type: listed assets, infrastructure, unlisted debt (including real estate), corporate private equity, and real estate equity.

Among these, the listed and real estate questionnaires include biodiversity-related questions, particularly regarding the existence of a biodiversity policy at the asset management company.

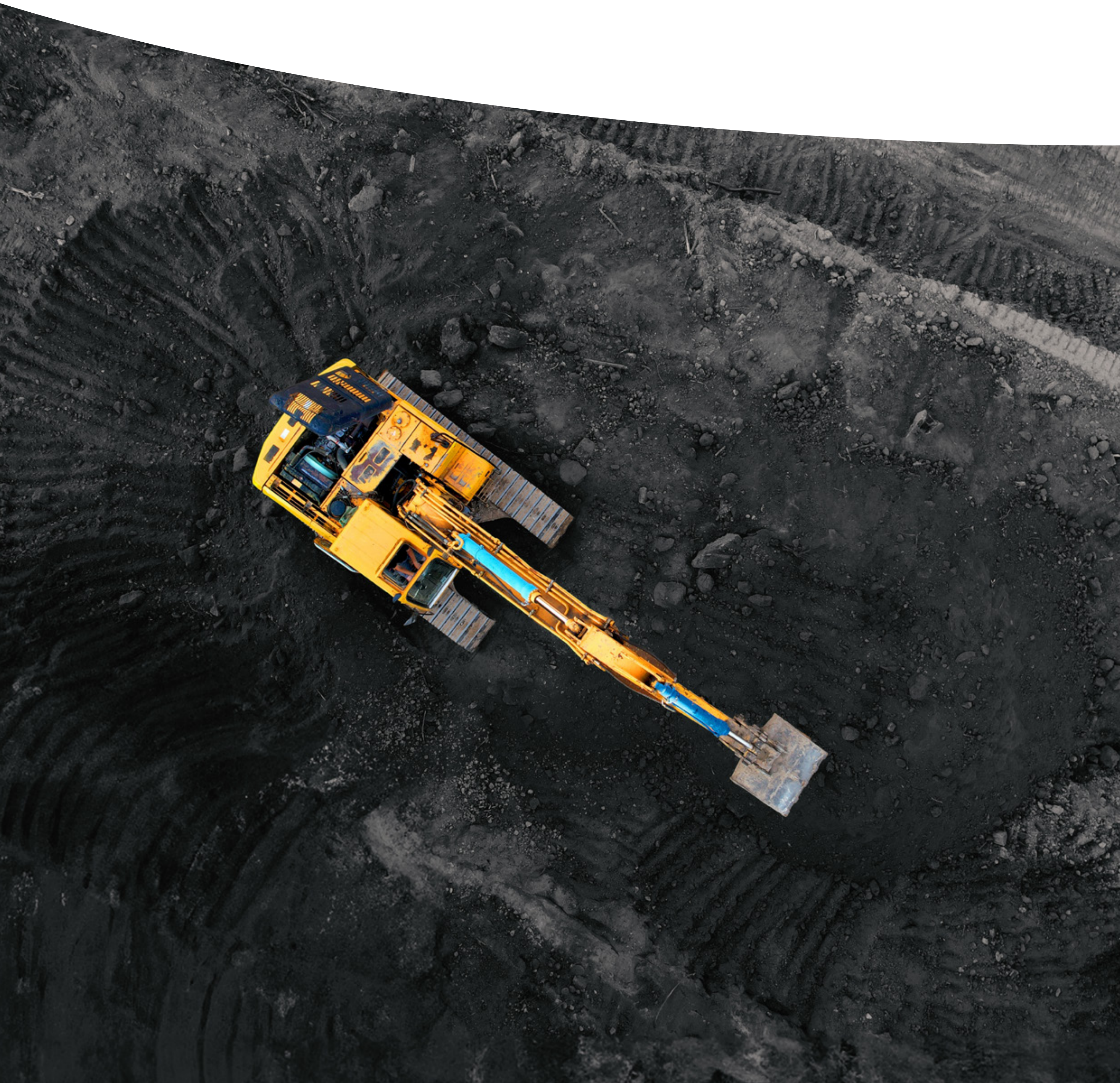


2. EXCLUDING INVESTMENTS MOST HARMFUL TO BIODIVERSITY

All of the Group's exclusion policies apply to new investments made directly or via dedicated funds managed by GAM. Sectoral exclusions for thermal coal and oil and gas significantly reduce the Group's exposure to sectors considered highly detrimental to biodiversity.

In parallel, the environmental rating filter, largely based on the NEC (Net Environmental Contribution) indicator, allows for the exclusion or monitoring of issuers in the eight most environmentally exposed sectors, including biodiversity. This indicator offers several advantages:

- **Multi-dimensional:** It covers climate, resources, pollution, water, and biodiversity, offering a holistic and comparable score from –100% to +100%.
- **Sectoral weighting:** It adjusts its weighting based on environmental materiality per sector, targeting activities exerting the strongest ecosystem pressures (e.g., agriculture, agri-food, construction materials).
- **Life cycle coverage:** The NEC accounts for entire product/service life cycles, capturing hidden impacts like land artificialization from supply chains.



3. INVESTMENTS SUPPORTING BIODIVERSITY AND ECOSYSTEM PRESERVATION

The Group promotes investments with positive externalities for biodiversity, particularly through forests and Natural Capital funds.

› GROUPAMA'S FOREST ASSETS AND BIODIVERSITY

Potential Biodiversity Index (IBP)

The **IBP**, developed by France's National Forestry Property Center (CNPF), evaluates a forest's **capacity to host plant**, **animal**, and **fungal species**, identifying areas to **preserve or improve**.

In 2024, **926 hectares** were assessed, i.e., **4.12%** of the forest portfolio.

POTENTIAL BIODIVERSITY INDEX: IMPROVEMENT PLAN

More plots will be assessed in 2025 to expand IBP coverage.

Environmental zoning

Groupama owns **biodiversity-rich forests**, with **25 forests** — over **14,500 ha**, or **65%** of its forest assets — falling under **environmental zoning**, meaning they host **high ecological value species or habitats** and are subject to protection measures.

Concrete biodiversity conservation measures

Groupama Forest Management focuses its efforts on two types of forest environments:

- **Wetlands:** A **mapping and diagnostic programme** began in 2023 to assess conservation status and plan restoration where needed. Actions are underway in **8 forests.**
- **Open habitats:** A **restoration plan** for open forest habitats classified as **ZNIEFF 1**[19], known for high biodiversity, was implemented in one of Groupama's forests.

Adapting forestry practices

Groupama Forest Management is exploring **climate**-, **ecology**-, and **society-adapted silviculture**. For example, it has introduced **continuous cover forestry in 14 forests**, a practice that maintains mature trees, fosters rare biodiversity, and improves climate resilience.

This approach also helps preserve the character of the forest, which is important to local communities.

Environmental zones have been designated within forests and are left to evolve naturally, serving as **refuges** for various species — particularly those dependent on **deadwood**.

Species and groups covered by National Action Plans (PNA)

A **PNA** is a conservation tool aimed at ensuring the protection or recovery of **threatened wildlife and plant species**.

In **2024**, **9 Groupama forests** were subject to a **National Action Plan**.

[19] The Natural Areas of Faunistic and Floristic Interest (ZNIEFF) are a specific inventory that locates and describes areas of the national territory that are particularly important ecologically, faunistically, and/or floristically. Two types of ZNIEFF are distinguished: Type 1 and Type 2. Type 1 ZNIEFF are areas of high biological or ecological interest that shelter well-identified heritage animal or plant species (including some protected species). Generally small in size, these zones are important for the preservation of the biotopes (living habitats of the species) concerned. Source: Cerema.

› NATURAL CAPITAL FUND

In 2024, Groupama committed to investing $20 million in the "Natural Capital Fund (NCF)" launched by Climate Asset Management (CAM), an asset management company dedicated to climate-impact private investments.

This Article 9 SFDR-classified fund targets profitable investments with high environmental impact, in three main areas:

- **Regenerative agriculture:** Rehabilitating degraded farmland through sustainable, locally relevant crops (e.g., almonds, macadamia, olives).
- **Sustainable forestry:** Replanting climate-resilient tree species for carbon sequestration and eco-responsible timber.
- **Environmental assets:** Preserving untouched lands vital for biodiversity, water, and carbon sinks.

The fund's business model is built on three value-creation levers: sale of sustainable crops generating recurring income after transition, sale of ecosystem services (e.g., carbon sequestration), and capital appreciation of regenerated assets at fund exit (>10 years).

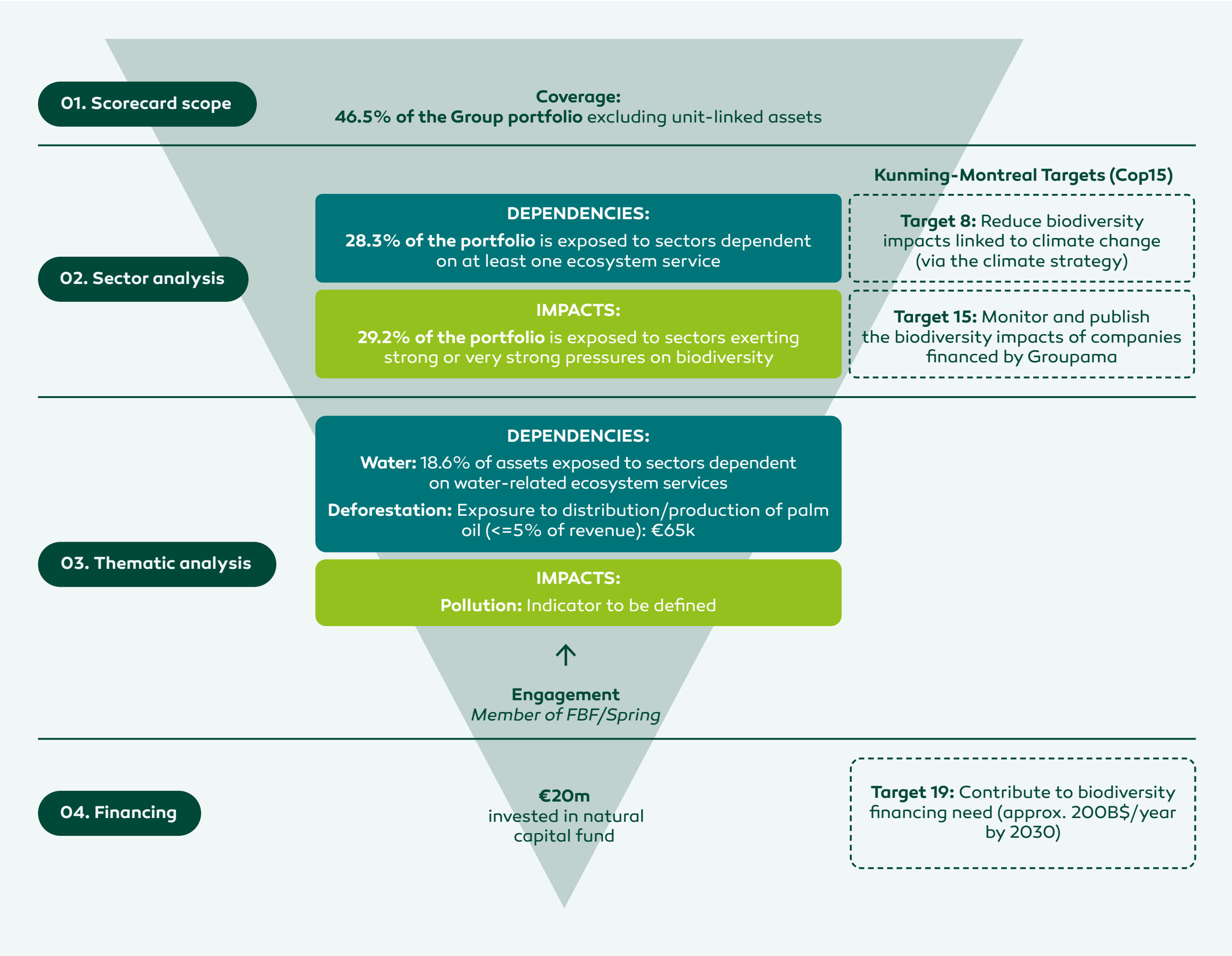
D. PILLAR 3: MANAGING BIODIVERSITY ISSUES AND TRAINING TEAMS

1. BIODIVERSITY SCORECARD: A SUMMARY OF OUR STRATEGIC FOCUS AREAS

In 2024, Groupama developed a biodiversity scorecard to structure operational tracking of key biodiversity issues in its investment portfolios, while providing a progressive and concrete response to the three long-term targets of the Kunming-Montreal Agreement prioritized by the Group (targets 8, 15, and 19).

This scorecard is intended for operational teams managing investments (e.g., the DOFI), the Group's governance bodies, and facilitates dialogue with entities like GAM on biodiversity integration.

It enables Groupama to strategically manage its biodiversity approach, linking risk assessment, thematic priorities, engagement, and funding.



This scorecard is based on a funnel approach, structured into four complementary levels:

1. **Scope of the biodiversity scorecard**

The biodiversity analysis focuses on the Group's listed equities and corporate bond portfolios, representing **46.5% of total assets excluding unit-linked contracts**. Within this scope, **99% of equities and corporate bonds** have undergone analysis.

The Group aims to extend the coverage of the biodiversity scorecard to other asset classes by 2026, such as real estate and forestry assets.

2. **Sectoral analysis of biodiversity risks**

Two indicators derived from the ENCORE database are used to assess the portfolio's exposure:

Dependencies: As of December 31, 2024, **28.3% of the portfolio** is exposed to sectors that are dependent on at least one of the 25 ecosystem services identified in the ENCORE database.

Pressures/Impacts: As of the same date, **29.2% of the portfolio** is exposed to sectors that exert strong or very strong pressures on biodiversity, according to ENCORE.

3. In-depth thematic analysis

The biodiversity scorecard is designed to track **key indicators related to three priority biodiversity-related themes i**dentified to date for the Group's investments:

Water-related theme

Consistent with last year's findings, biodiversity analyses indicate critical dependencies and impacts related to water. Specifically, 18.6% of the equity and corporate bond portfolio is exposed to sectors that are highly or very highly dependent on at least one ecosystem service related to water.

According to the ENCORE database, four ecosystem services are linked to water:

1. **Two regulating services: flow regulation and water quality regulation;**
2. **One provisioning service: freshwater supply;**
3. **One cultural service: aquatic recreational activities.**

In 2024, the Group conducted additional issuer-level analysis.

The average water consumption of companies in the portfolio, expressed in cubic meters per million euros of revenue (m^3/€m turnover), was calculated using Clarity data covering 73% of the equity and corporate bond portfolio, and amounted to 2,052 m^3/€m turnover.

This figure is difficult to interpret for several reasons:

- **The lack** of reliable market benchmarks**;**
- **No comparative data,** as previous analyses were performed only on GGVie's portfolio using a different data provider;
- **The methodology shows limitations,** with some figures seeming inconsistent (e.g. unusually high water volumes for service companies).

Despite these limitations, the average water consumption indicator helped identify issuers with high water dependency, particularly in the utilities, chemical, and refining sectors. Moreover, the Group's work with this indicator led to discussions with the data provider on outlier values, aiming to enhance data quality.

In the absence of more precise metrics, the Group will monitor, within the biodiversity scorecard, the share of assets exposed to sectors dependent on water-related ecosystem services.

In 2025, the Group will continue the qualitative evaluation of how the most water-dependent companies manage these risks (initiated in 2023), and the search for reliable, robust, and sufficiently comprehensive indicators on this issue at the company level.

Deforestation

Since 2022, the Group has chosen to focus on the issue of deforestation, for several key reasons:

1. Among the seven sectors in the portfolio with the greatest biodiversity impacts (regardless of portfolio weight), **the first** (Crop and animal production, hunting and related service activities) and **the fourth** (Forestry and logging) are directly linked to deforestation.
2. **Market frameworks such as the TNFD and the Finance for Biodiversity Foundation (FBF) identify deforestation as a major driver of biodiversity loss**, associated with one of the main pressures highlighted by IPBES: land-use change. Investors are strongly encouraged by these initiatives to assess their exposure and impacts related to deforestation.
3. In its June 2025 position paper, the Net-Zero Asset Owner Alliance (NZAOA) emphasized the relevance and **importance of setting a target to eliminate deforestation by 2030** in alignment with a Net Zero ambition.

In this context, the Group has decided to include, in its biodiversity scorecard, the value of its investments exposed to palm oil. As of 31/12/2024, the Group held €401,393 in companies involved in the production and/or distribution of palm oil, representing less than 0.001% of the listed equity and credit portfolio. Of this amount, €335,956 was invested in companies deriving less than 5% of their revenue from these activities.

On this theme, the Group aims to deepen its analysis and assessment of deforestation-related risks, with the goal of progressively integrating these into its investment policy. In line with international commitments, Groupama aims to phase out all deforestation-linked activities from its portfolios by 2030.

Pollution

The portfolio impact analysis conducted in 2024 highlighted the significant role of pollution in the overall environmental footprint of the Group's investments: **18.4% of the portfolio is exposed to sectors highly associated with toxic emissions to soil and water, and 12.9% to air pollution.**

As a result, the Group has initiated in-depth analyses to identify the most pollution-intensive sectors. At this stage, the results remain difficult to exploit, and further analytical work is planned.

At the issuer level, Principal Adverse Impact (PAI) indicators are useful in assessing pollution-related risks and dependencies, but they have limitations.

For example, PAI 9 (generation of hazardous and radioactive waste) was examined using Clarity data covering 88% of the equity and corporate bond portfolio.

The initial portfolio average — 5 tonnes per million euros invested — proved to be abnormally high and unrepresentative. A deeper investigation revealed a methodological bias: in the metals extraction sector, extracted materials were, in some cases, incorrectly classified as hazardous waste, contradicting standard definitions.

A revised version of the analysis was developed, excluding issuers with the most extreme and inconsistent ratios (about 1% of total holdings). This adjusted dataset now covers 87% of the portfolio, and yields a much more representative average: 0.8 tonnes per million euros invested.

These findings underscore the need for caution when interpreting extra-financial indicators, while highlighting the value of progressively incorporating them into decision-making tools — provided their methodological robustness is sufficient.

The Group will continue its work through 2026 to identify reliable and relevant indicators for sectors or sub-themes that show high pollution-related impacts.

Engagement: a cross-cutting lever for all three priority themes

Engagement is a critical tool for complementing analytical work and enhancing the Group's understanding of these key environmental challenges through active dialogue with stakeholders.

Therefore, the number of companies with which Groupama Asset Management engages on these themes will be included in the biodiversity scorecard. As of today, GAM is leading or co-leading engagement with one company as part of the SPRING initiative, which focuses on deforestation.

Furthermore, to complement this approach through direct engagement with companies, the Group will, in 2025, consider joining the Finance for Biodiversity Foundation. Such membership would notably allow participation in the initiative's thematic working groups and access to peer feedback from other investors, particularly on the maturity and quality of biodiversity data.

4. Financing

In line with Target 19 of the Kunming-Montreal Global Biodiversity Framework, the Group is committed, via its biodiversity scorecard, to tracking biodiversity-focused financing.

In 2024, Groupama committed to investing **€20 million in the Natural Capital Fund** (NCF), launched by Climate Asset Management (CAM), an asset manager specialized in private market investments with climate impact objectives.

2. TRAINING TO STRENGTHEN TEAM EXPERTISE

To reinforce its teams' expertise on major environmental issues, Groupama launched a dedicated training programme in 2024, targeting its investment teams. The first topic addressed was deforestation, a strategic issue due to its direct impact on climate, biodiversity, and related financial risks. This initiative aligns with the Group's biodiversity strategy by equipping teams to better understand and manage these risks and integrate them into investment decision-making.

In 2025, a new training session will focus on water-related challenges.

The objectives of these training sessions are to:

- **Address specific and practical needs of the teams,** based on the investment strategies in place;
- **Engage specialist teams** in the implementation of the biodiversity strategy;
- **Provide actionable guidance** to help teams integrate biodiversity-related issues into investment processes.

THE CHALLENGES ASSOCIATED WITH DEFORESTATION

Deforestation is one of the main drivers of biodiversity loss and a major contributor to climate change. It leads to the destruction of natural habitats, threatening plant and animal species — often endemic — while disrupting ecological balance. At the same time, it significantly contributes to global greenhouse gas emissions. The agriculture, forestry, and other land use (AFOLU) sector accounts for approximately 22% of global GHG emissions, nearly half of which is directly linked to deforestation and land conversion.

When a forest is destroyed, the carbon stored in biomass and soils is released into the atmosphere, exacerbating climate disruption. Conversely, forests absorb around one-third of global CO_2 emissions annually, underlining their critical role in climate mitigation.

Today, deforestation is largely driven by agricultural expansion intended to meet global demand for so-called "forest-risk" commodities such as beef, soy, palm oil, cocoa, timber, rubber, and paper. As such, it represents both a systemic risk to the global economy and a tangible financial risk for investors exposed to these value chains. These risks can be broken down into two main categories:

- **Physical risks,** stemming from certain sectors' dependency on healthy forests for their operations and supply chains;
- **Transition risks,** related to evolving regulations, shifting consumer preferences, and technological developments.

Recognizing the urgent need for action, the Global Stocktake adopted by the Parties to the Paris Agreement at COP28 set the halt and reversal of deforestation by 2030 as a priority. In this context, the regulatory landscape is evolving rapidly, and a growing number of tools are now available to help investors assess and manage their exposure to deforestation-related risks.

However, additional efforts remain necessary, both at a systemic level and within portfolio management practices. This topic is still relatively new for many financial actors and, much like the climate agenda several years ago, it will require time, awareness-building, and a gradual strengthening of capabilities before being fully embedded into investment practices.

VIII. INTEGRATION OF ESG CRITERIA IN RISK MANAGEMENT

A. IDENTIFYING AND PRIORITIZING SUSTAINABILITY RISKS

1. THE GROUP'S SUSTAINABLE INVESTMENT POLICY AS A PRIMARY RISK MANAGEMENT LEVEL

> Groupama manages sustainability-related risks by reducing its exposure to ESG issues it identifies as most significant.

This approach is based on a rigorous sustainable investment policy, which serves as a core tool for managing non-financial risks. **Detailed in Part I of this report, it is structured around the following pillars:**

1. **An exclusion policy on fossil fuels**, regularly reinforced to include developers of oil and gas, including conventional;
2. **Implementation of the Major ESG Risks list**, which identifies issuers exposed to major ESG controversies or persistent governance weaknesses;
3. **Application of an environmental rating filter**, targeting the most exposed sectors through indicators such as the NEC (Net Environmental Contribution), carbon intensity, and alignment with climate targets;
4. **Systematic integration of ESG criteria into investment decisions**, for both listed and unlisted assets;

Specific policies for real estate and forestry assets, accounting for environmental performance, climate change adaptation, and ecosystem preservation.

This structure is currently focused on environmental risks, in line with the priority issues identified through the double materiality assessment conducted for the first CSRD[20] report. This focus also reflects the more advanced maturity of data and methodologies available for environmental risks. Tools for monitoring social and governance risks remain too heterogeneous to support precise operational management.

Climate risk forms the backbone of this approach, but the Group is progressively extending its analysis to include biodiversity-related issues, **distinguishing between two main types of risk:**

- **Physical risks**, arising from direct impacts of climate change or biodiversity loss (e.g., wildfires, floods, extreme weather events, degradation of ecosystem services);
- **Transition risks,** linked to changes in public policies, regulations, consumer preferences, or technologies in the context of ecological transition.

The type of risk monitored depends on the asset class, based on its exposure and the availability of relevant data:

- **For corporate bonds**, the focus is primarily on transition risks;
- **For sovereign bonds**, real estate, and forestry assets, the analysis concentrates on physical risks.

This structure enables the identification of key sustainability risk exposures according to asset type. To ensure effective management, these risks are then monitored through a dedicated framework, integrated into the Group's overall risk governance structure, as outlined below.

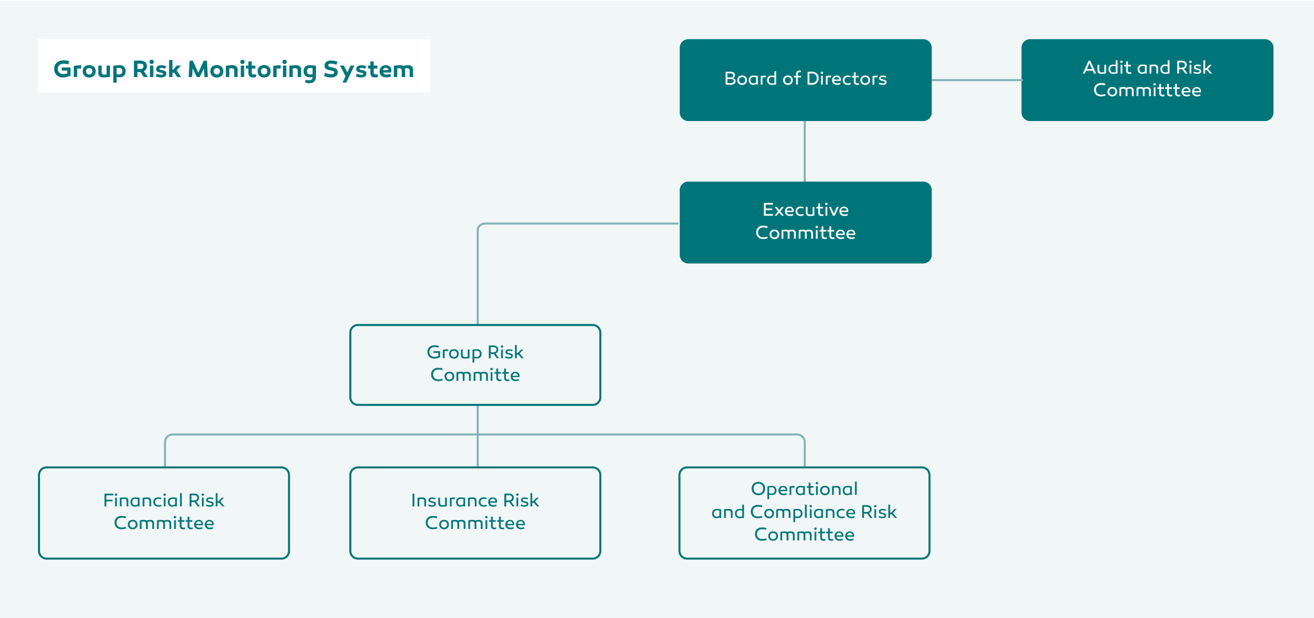
[20] A risk has been identified regarding investments in the CSRD report: the risk of loss in value of financial assets exposed to physical risks, transition risks, and ecosystem dependency on the balance sheet.

2. THE RISK MONITORING FRAMEWORK INTEGRATES CLIMATE RISKS

To better manage its exposures, the Group has implemented a comprehensive risk monitoring framework that includes climate risk. Since 2014, this framework has relied on the **Own Risk and Solvency Assessment** (ORSA) process, formalized through the drafting of an annual report.

Governance of the risk monitoring framework is managed at the Group level by several bodies, notably:

1. **Risk committees by risk family** (insurance, financial, operational, and compliance), which define the risk management framework and report to the Group Risk Committee twice a year;
2. **The Group Risk Committee**, composed of members of the Group Executive Committee and the holder of the key risk management function, builds on the work conducted within the specialized risk committees and meets twice a year. It is responsible for monitoring the climate risk indicators described below;
3. **The Executive Committee** validates the major risk mapping annually to ensure alignment with the Group's evolving risk profile. Each risk is documented, quantified, and reviewed within its relevant specializedd committee, then synthesized for review by the Group Risk Committee and ultimately validated by the Audit and Risk Committee.



The Group's major risks include those identified by business line. The need to take into account climate change and biodiversity loss has led Groupama to integrate sustainability risks within its major risks framework.

As such, the following climate risk monitoring indicators are reviewed on a regular basis:

1. **For the directly held and look-through portfolio of listed equities and corporate bonds (excluding unit-linked assets):**
   - The exposure to fossil fuels (gross value in millions of euros);
   - The carbon intensity;
   - The balance sheet allocation across the three categories of natural capital.
2. **For direct investments:**
   - The acquisition cost (in millions of euros) of green and social bonds;
   - The NEC (Net Environmental Contribution).

The Group Risk Department relies on the reports and conclusions of the various entity-level risk committees to track these indicators at the asset level. A consolidated dashboard is reviewed by the Financial Risk Committee. This dashboard highlights Groupama's exposure trends relative to the selected indicators. It is then presented to the Ethics and Sustainability Committee and validated annually by the Audit and Risk Committee.

The Risk Department also defines a set of financial and insurance stress tests incorporating climate data (e.g., based on the occurrence of recent climate events within a sub-annual period) aimed at simulating impacts on the Group's solvency.

B. EXPOSURE OF THE GROUP'S VARIOUS ASSET CLASSES TO PHYSICAL AND TRANSITION RISKS

> CORPORATE BONDS: A PROGRESSIVE QUANTIFICATION OF TRANSITION RISK

To assess the exposure of its bond portfolio to climate transition risks, the Group chose to quantify the impact of introducing a carbon price. This mechanism — whether via a carbon tax or an emissions trading scheme — aims to internalize the environmental cost of greenhouse gas emissions by creating a price signal that incentivizes decarbonization.

This initiative, launched in 2023 on Groupama Gan Vie's portfolio, continued in 2024 with a methodology focused on corporate bonds. It now covers **€17.9 billion**, or **43%** of GGVie's portfolio excluding unit-linked assets.

As an investor, modeling the impact of a carbon price enables anticipation of the financial and economic effects of more stringent climate regulation, by identifying companies whose profitability would be most affected. The Group adopted a hypothetical carbon tax of **€200 per ton of CO_2** applied to scope 1 and 2 emissions as its main analytical variable. The impact of this tax is estimated by modeling the EBITDA at risk, which is then translated into a valuation loss through the adjustment of the credit spread, based on the net debt/EBITDA ratio.

Two scenarios were modeled:

1. **Uniform application of the carbon tax**, with no ability to adjust prices;
2. **Adjusted application based on sectoral pricing power** — i.e., the ability of companies to pass on the tax to their customers. In this analysis, sectors were classified into three pricing power categories: High, Moderate, and Low, with respective pass-through rates of 75%, 50%, and 25%. The adjusted carbon tax is then calculated by reducing the initial €200/tCO_2 by the appropriate percentage according to each sector's pricing power.

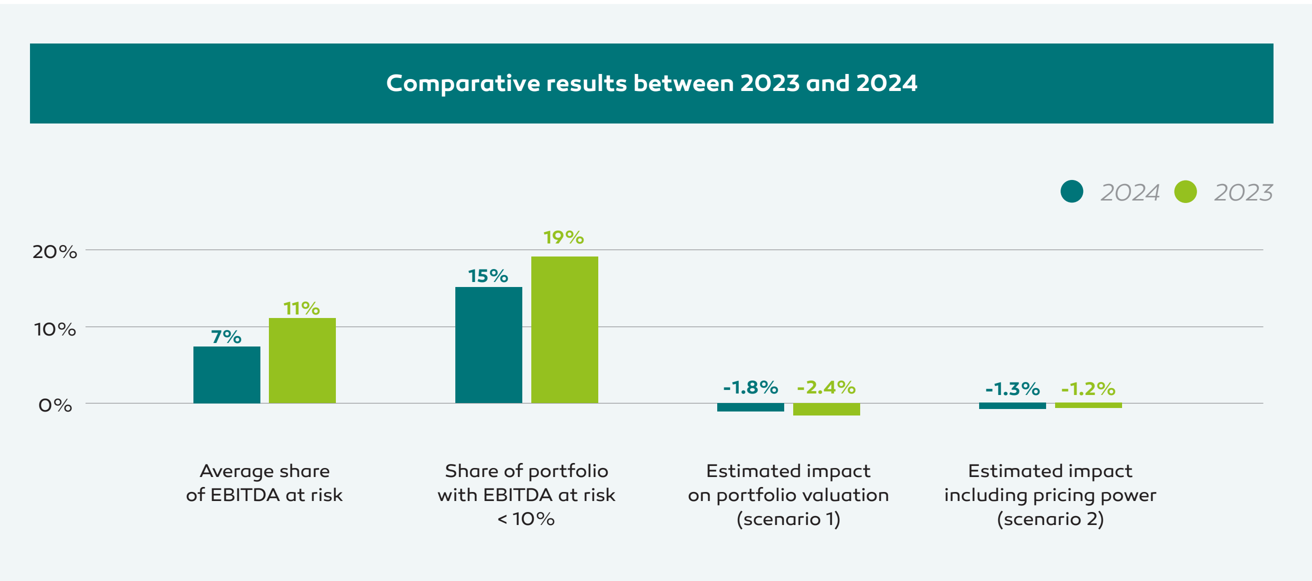
2024 results show overall improvement across the four monitored[21] indicators compared to 2023:

- **The average share of EBITDA at risk decreased from 11% to 7%**, driven by lower average emissions per issuer and a slight increase in average EBITDA;
- **The proportion of the portfolio exposed to EBITDA at risk >10% fell from 19% to 15%**, a 4-percentage point decrease;
- **The estimated impact on portfolio valuation (Scenario 1) improved from -2.4% to -1.76%**, reflecting stronger financial resilience of issuers to a regulatory shock;
- When factoring in pricing power (Scenario 2), t**he impact remained more moderate and stable, from -1.3% to -1.2%**.

These results suggest a progressive improvement in the portfolio's climate performance, with issuers both emitting less CO_2 and showing increased financial robustness.

This analysis provides the Group with an operational monitoring tool for transition risk, while highlighting the refinements required to enhance its accuracy: expanding the scope to include financial and real estate companies, updating economic assumptions (spreads, pricing power), and eventually incorporating Scope 3 emissions.

[21] The comparison between 2023 and 2024 is provided for indicative purposes only, as the scope differs. Indeed, 2023 included the equity segment, whereas the 2024 analysis was conducted solely on the corporate bond segment. For your information, the equity segment represents 4.5% of GGVie's combined equity and corporate bond portfolio as of the end of 2024.



› SOVEREIGN BONDS

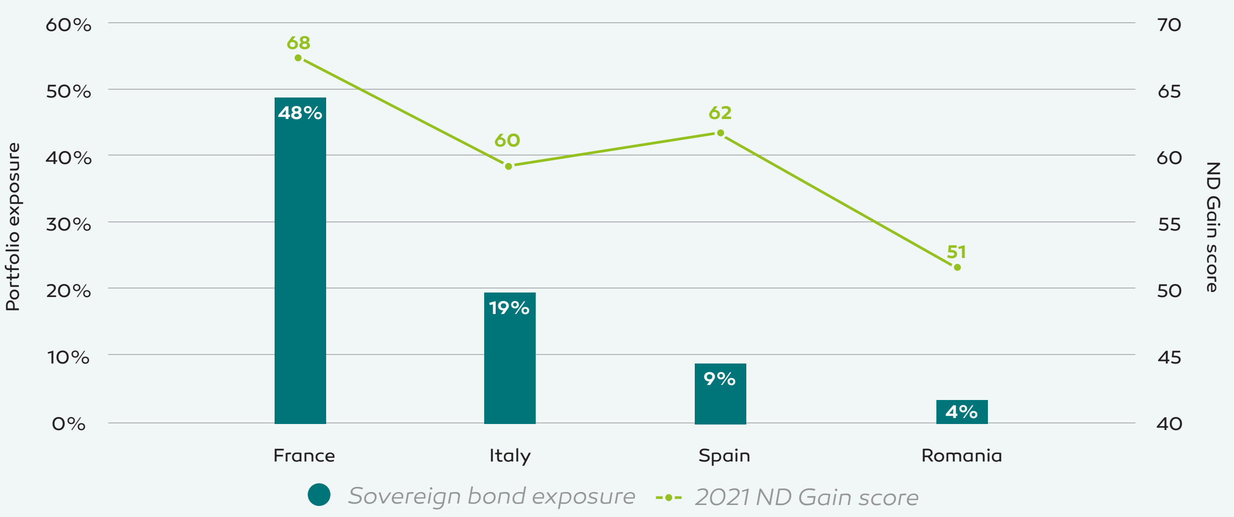
To assess its exposure to physical risks linked to sovereign debt — which represented 37% of the Group's assets at year-end 2024 — Groupama uses the Global Adaptation Index developed by the University of Notre Dame (ND-GAIN Index).

The ND-GAIN Index combines two key dimensions:

- **A country's vulnerability** to the impacts of climate change (droughts, floods, water stress, etc.);
- **Its adaptive capacity**, meaning the infrastructure, institutions, and resources available to respond to such challenges.

In Groupama's case, the portfolio's high average score of 64.2, comparable to 2023, reflects a strong concentration in Europe — particularly in France, Italy, and Spain — where institutional capacities are relatively robust and adaptation infrastructure is already partially in place.

Exposure of the sovereign bond portfolio according to the ND GAIN score as of 31/12/2024



› REAL ESTATE AND FORESTRY ASSETS – ANALYSIS OF PHYSICAL CLIMATE AND BIODIVERSITY RISKS

Groupama's real estate portfolio is subject to risk mapping using the R4RE platform (Resilience for Real Estate), developed by the Observatoire de l'Immobilier Durable (OID).

Real estate – Climate risks

Adapting real estate assets to climate change is a key concern, as the occurrence of climate-related hazards can negatively impact asset operations and value.

Physical risks for real estate assets under management are assessed using the Bat-ADAPT tool on the R4RE platform, which provides a cross-analysis of:

- **Exposure to climate hazards** under a 2050 "business as usual" scenario, based on asset location and time-based projections (heatwaves, droughts, floods, marine submersion, wildfires);
- **Building vulnerability** (vulnerability score).

Results show that each asset faces at least one high or very high hazard risk, particularly:

- **Heatwaves** pose a high or very high risk for 92% of assets;
- **Floods/precipitation** pose a high or very high risk for 34% of assets.

Below is a table summarizing the exposure to physical hazard of the real estate portfolio as a percentage of the number of assets:

Hazard	Heatwaves	Floods
Low	3%	29%
Moderate	6%	38%
High	4%	5%
Very High	88%	29%

These findings are based on the latest climate projection standards (IPCC, DRIAS, GIEC), particularly the SSP2-4.5 "business as usual" scenario, which forecasts a +4°C temperature increase by 2100 and includes urban heat island effects.

The level of data granularity also influences results. For 2024, only the mandatory data fields were completed in the tool.

For assets with high to very high exposure to hazards, action plans are put in place. Priority is given to assets most exposed to heatwave risks, with resilience measures including vulnerability audits and improvement works (e.g., window shading, solar protection, regulation of ventilation/cooling systems).

These analyses also support due diligence during acquisitions and renovation projects, helping to anticipate risks and reduce asset vulnerability.

2025 IMPROVEMENT PLAN:

In the coming months, work will focus on enhancing data quality by improving vulnerability analyses, to enable the completion of more optional data fields in the tool.

Real estate – Biodiversity risks

Since 2023, the BIODI-Bat tool has been used to assess biodiversity risk across the entire real estate portfolio based on property addresses. The findings indicate that the majority of assets are located in **restoration** zones, where the priority is to recreate habitats conducive to biodiversity, or in **improvement** zones.

Few assets are located in **conservation** zones, where there is an urgent need to protect threatened biodiversity hotspots.

BIODIVERSITY CHALLENGE OF THE PROPERTY PORTFOLIO

By comparing the biodiversity status at a specified location with that of the broader region, it is possible to determine the "biodiversity challenge" specific to the site's location. This challenge falls into one of three main categories: conservation of an already favorable biodiversity status, improvement of an intermediate biodiversity level and restoration of degraded biodiversity areas.

Physical risks related to forestry assets

Forestry assets are also exposed to physical risks. Groupama has identified the following key threats:

- **Storm risks;**
- **Wildfire risks;**
- **Phytosanitary risks (e.g., pests, pathogens).**

Climate change significantly intensifies these risks and poses a serious threat to French forests. Its accelerating impacts weaken trees and ecosystems, which are inherently slow to adapt. Climate-related changes exacerbate all known forest risks: severe droughts compromise tree health and resilience, more frequent and intense storms increase physical damage, wildfires occur more frequently, over larger territories and longer periods, pests and diseases benefit from warmer winters to spread, and species distribution shifts, making some tree species no longer suited to their environment. These factors are placing increasing pressure on the resilience of forest ecosystems.

Groupama has implemented several measures to prevent or mitigate these risks:

- **Storm impact prevention strategies;**
- **Maintenance of forest roads and roadside areas** (e.g., clearing, grounding) to act as natural firebreaks and reduce the risk of accidental fire outbreaks;
- **Wildfire prevention**, in collaboration with associations such as Défense de la Forêt française Contre les Incendies (DFCI);
- **Shortening of harvestcycles** to lower exposure by reducing the volume of timber at risk;
- **Adaptation of tree species**, selecting those better suited to evolving climatic conditions.

8-10, rue d'Astorg - 75383 Paris Cedex 08
343 115 135 RCS Paris
www.groupama.com