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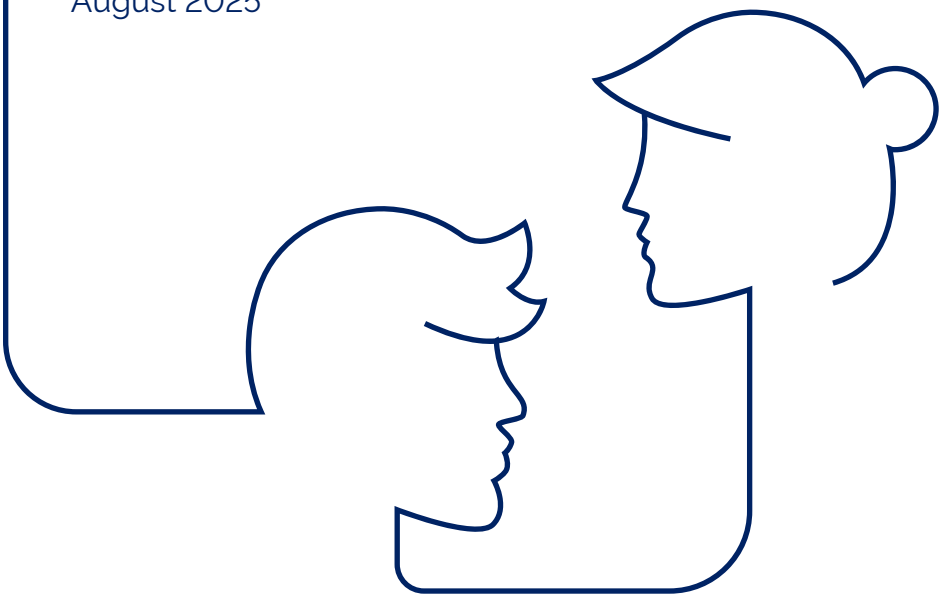
Group cybersecurity policy summary

August 2025



Version 1

Introductory note

This document is a condensed version of the CNP Assurances Group's cybersecurity policy - GR/DCSG/POL001 (the "**Policy**"). It is intended primarily for external stakeholders and offers a concise overview of the measures in place to secure information within each entity of the CNP Assurances Group, consisting of CNP Assurances Holding and all of its direct and indirect subsidiaries (the "**Group**").

1. Purpose and scope of the policy

- The Group places strategic importance on cybersecurity in order to ensure the digital resilience of its operations, comply with its obligations and strengthen the confidence of its stakeholders.
- The Policy defines the fundamental guidelines for information security. It applies to all entities of the Group, as well as to its personnel, partners and service providers that have access to its data or information systems.
- In compliance with applicable legal and regulatory requirements, the Policy aims to guarantee the confidentiality, integrity and availability of information processed by aligning itself with the state of the art in cybersecurity.
- Approved at its inception by the Executive Committee (COMEX) and upon any significant change by the Group Risk Committee (CRG), the Policy reflects the cybersecurity strategy overseen by the Group's Board of Directors. It is reviewed at planned intervals to take into account technological, regulatory and security standards developments, as well as the constantly evolving dynamics of cyber threats.

2. Guiding principles

The Group's cybersecurity is built on the following guiding principles. Aligned with leading international standards, these principles guide all protection efforts and ensure dynamic management of cyber risks:

2.1. Risk-based approach and continuous improvement

- The Group is committed to a proactive security approach in line with the ISO/IEC 27001 standard's "Plan-Do-Check-Act" (PDCA).
- Risk analyses are conducted continuously to identify, assess and effectively address threats to information and related assets.
- This approach drives a structured continuous improvement process, including frequent controls and corrective or strengthening security actions, taking into account the risk appetite defined by the Group.

2.2. Protection of information and associated assets

- The Group's information assets are rigorously protected to prevent any leakage, alteration or unauthorized access to data.
- Systems, applications and infrastructure are secured in accordance with best practices in order to ensure the confidentiality, integrity and availability of data throughout its lifecycle.

2.3. Monitoring and threat response

- Continuous monitoring of system security and emerging threats is performed.
- Detection and alert mechanisms enable the rapid identification of events, intrusion attempts or suspicious activities.
- The Group has a proven security incident response capability with escalation procedures that enable effective handling of any cyber incident and limit its impact on the Group's activities and customers.

2.4. Shared responsibility and security culture

- Within the Group, information security is everyone's responsibility. Strongly committed to cybersecurity, the Board of Directors and the Executive Committee (COMEX) ensure that every employee is aware of the protection rules and the need to apply them on a daily basis.
- An ongoing awareness and training program is implemented to foster a true culture of security. All employees are required to complete annual training to learn best practices and the obligations related to information security.

2.5. Third-party risk management

- The Group requires a high level of security from its service providers and partners, aligned with its own standards.
- A due diligence process, contractual clauses and an annual audit program ensure the appropriate protection of data shared with third parties.

3. Governance, roles and responsibilities

A clear and structured governance forms the foundation of a robust and effective Information Security Management System (ISMS). To this end, the Group has established a governance model structured between central bodies and operational entities to ensure consistent implementation of the Policy at all levels of the organization:

3.1. Central governance structure

- The Board of Directors, on the advice of its specialized committee, the Audit and Risk Committee (CAR), approves the Group's risk appetite and cybersecurity strategy.
- The Executive Committee (COMEX) bears ultimate responsibility for information systems security. It ensures the effective application of the Policy and its integration into the Group's overall strategy.
- The Group Chief Information Security Officer (Group CISO), as Head of the Group Cybersecurity Department, develops the Policy, drives the implementation of the ISMS, measures its performance and reports regularly to the Executive Committee and specialized committees: the Information Systems Security Committee (CSSI), the Group Risk Committee (CRG), and the Audit and Risk Committee (CAR).
- To ensure cross-functional steering of the ISMS and its continuous adaptation, this governance relies on bimonthly Information Systems Security Committee (CSSI) meetings, composed notably of the Risk Management Function, IT, the Data Protection Officer (DPO) and members of the Executive Committee.
- The organization follows a three-lines-of-defense model, ensuring a separation of responsibilities between implementation and operations (first line), steering and second-level control (second line), independent audit (third line):
    - Comprised of IT and business teams, the first line applies security measures within the company's operational activities. The IT team, fulfilling detection, protection and continuity functions, designs, deploys and operates security solutions. Acting as the guarantor of technical security measures and their operational maintenance, it carries out first-level controls and supports projects on security matters.
    - Comprised of the Risk Management Function (including the Group Cybersecurity Department), the second line is responsible for defining, steering and monitoring the ISMS. It identifies and tracks cyber risks, ensures compliance with regulations in coordination with the Compliance Department and performs regular controls on the measures in place.
    - The third line is the Group Internal Audit Department, which independently and regularly evaluates the effectiveness of the ISMS and the proper implementation of applicable security standards. Its recommendations are incorporated into continuous improvement plans.
- Employees are required to comply with security rules and procedures in their daily activities. They are continually made aware of and trained in good practices. Any breach is analyzed, followed and results in appropriate actions (reminders, educational measures or even disciplinary sanctions).
- Partners and service providers must also conform to the Group's security requirements. Regular audits and joint steering committees are conducted to ensure the protection of the data and systems involved.

3.2. Operational implementation at the entity level

- In compliance with the guidelines defined by the Group Cybersecurity Department, each entity operationally implements this Policy according to its own specific context.
- In this framework, each entity is responsible for establishing local governance aligned with the central model, integrating cybersecurity requirements into its activities, conducting risk analyses tailored to its environment, raising security awareness among its employees and participating in the centralized system for security event detection, response and reporting.
- The Group Cybersecurity Department oversees this rollout through methodological support, regular coordination of the security correspondent network and continuous monitoring to ensure the consistency, coherence and effectiveness of the overall ISMS across the Group.

4. Risk management and compliance framework

A cybersecurity program covering all facets required for robust protection is implemented on an ongoing basis. Aligned with leading security frameworks (ISO, NIST, CIS, OWASP, etc.), this program ensures consistent risk treatment and a framework for continuous improvement. The processes implemented include in particular:

4.1. Risk analysis and treatment

- Data and associated information systems are inventoried and undergo regular security analyses.
- A risk map is maintained and treatment plans are implemented to mitigate identified risks in line with the risk tolerance defined by the Group.

4.2. Internal security framework

- The Policy is broken down into operational directives and procedures covering all key domains: governance, asset classification, access management, data and application security, network protection, security event management, business continuity, compliance, etc.
- These documents provide teams with instructions to follow in order to implement security on a daily basis.
- Regularly reviewed, the Internal Security Framework is made available to all entities for local adaptation if necessary, while maintaining a high common baseline.

4.3. regulatory and standards compliance

- The cybersecurity program incorporates the requirements of applicable regulations and aligns with the aforementioned security frameworks.
- The Group demonstrates its compliance with current cybersecurity and data protection laws and regulations.
- It closely follows the recommendations of supervisory authorities and collaborates with them in full transparency.

5. Security measures and monitoring

To anticipate and respond effectively to cyber threats, the Group deploys a coherent set of preventive, reactive and corrective security measures, ensuring constant vigilance and a proven ability to safeguard its information and associated assets:

5.1. Preventive security

- The Group applies the principle of defense-in-depth, combining multi-layered security mechanisms (firewalls, intrusion detection systems, antivirus/EDR, network segmentation, strict access rights management, multi-factor authentication, encryption of sensitive data, etc.).
- Security configurations and parameters are defined according to the state of the art to minimize potential attack surfaces.

5.2. Vulnerability management

- A vulnerability analysis and monitoring process is in place to identify potential weaknesses affecting the Group's assets.
- Vulnerability scans and penetration tests are performed periodically.
- To keep the infrastructure up to date and protected, security patches are applied diligently according to the criticality of the vulnerabilities.

5.3. Maintaining a secure state

- Systems are continuously monitored to ensure compliance with security guidelines (secure configuration, hardening, account and access rights reviews, etc.).
- Ongoing controls and self-assessments are carried out by the responsible teams, supplemented by periodic tests conducted by the Risk Management Function to ensure that security measures are operating effectively.

5.4. Incident detection and response

- The Group has established a security monitoring capability enabling the detection of unusual or malicious events (SIEM, SOC).

- Dedicated incident response teams and procedures are in place: as soon as a security event is detected, an escalation process allows employees to report it without delay.
- If a security incident were to occur, it would be analyzed and handled according to a defined response plan, including communication to governing bodies and, where applicable, notification to regulators and affected parties.

5.5. Business continuity and operations recovery

- To guard against any major incident, the Group has developed business continuity and IT recovery plans.
- These plans cover severe security incident scenarios and provide for data backup procedures, failover to backup infrastructures and restoration of systems within controlled timeframes.
- Regular tests of these IT contingency plans are carried out to ensure the effectiveness of measures and the preparedness of teams in the event of an actual crisis.

6. Control, reporting and continuous improvement

To effectively manage cybersecurity and adapt to ever-evolving threats, the Group has established a process of control, regular evaluation and continuous improvement that ensures a high level of maturity and transparency:

6.1. Audits

- The Group undergoes continuous independent external audits on organizational and technical aspects of cyber risk management based in particular on frameworks such as ISO/IEC 27001/2, the NIST Cybersecurity Framework (NIST CSF/SP 800-15), OWASP, the French General Security Baseline (RGS) or even the cyber policy of La Banque Postale, its parent company.
- In addition, internal audits of the IT infrastructure and ISMS are regularly carried out to evaluate their compliance with cybersecurity standards and to identify any potential areas for improvement.
- The conclusions from these audits are incorporated into security action plans and their implementation is monitored by the Group Cybersecurity Department.

6.2. Security reporting

- A reporting system is in place to track performance and risk indicators, as well as any vulnerabilities.
- The Group Cybersecurity Department regularly prepares a report for the specialized committees and the Executive Committee (COMEX), including a summary of key events from the past period and the progress of security initiatives.
- The Group attaches particular importance to transparency with its governance bodies and, when necessary, externally: in the event of a major incident affecting sensitive data, impacted stakeholders and regulatory authorities would be informed in accordance with the company's obligations and commitments.

6.3. Review and update of the policy

- To ensure the continuous improvement of security, the Information Systems Security Committee (CSSI) conducts a comprehensive review of the ISMS at scheduled intervals, incorporating audit results, the current state of cyber threats, key security indicators and the evolution of the technological and regulatory environment.
- This review notably serves to assess the operational effectiveness of implemented measures, confirm the alignment of the Policy and allocated resources with the defined objectives, identify improvement opportunities, and potentially validate a roadmap for security enhancement.
- At the end of the review, the Policy is updated, even if only to acknowledge the review itself. Any significant change is subject to formal approval by the Group Risk Committee (CRG), thereby ensuring the ongoing relevance and adaptation of the ISMS to the current cyber risk landscape.

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