

## Modern Slavery Statement for 2025

This statement is issued in response to Section 54(1) of the UK's Modern Slavery Act 2015 (the "Act"). The Act requires the disclosure by large organisations carrying on business in the UK, in an annual statement, of the steps taken to prevent modern slavery from occurring in their own operations and in their supply chains. This statement is made on behalf of Euro Insurances DAC trading as Ayvens Insurance ("AYINS") in respect of the financial year ended 31st December 2025. Ayvens Insurance is part of the Societe Generale Group. In its own modern slavery statement Societe Generale confirmed that each of its subsidiaries that are directly subject to one of these Acts, may rely on the Societe Generale statement for its own declaration. In this statement, we have highlighted where AYINS relies on the Societe Generale statement. In line with the Societe Generale statement, the actions taken by AYINS as a subsidiary to assess and address the risks of modern slavery and human trafficking are detailed in this individual statement.

The preparation of this statement follows consultation with relevant teams within Ayvens and with Societe Generale.

Both Societe Generale and AYINS strive to act with integrity and in compliance with the laws and regulations applicable to its activities. Societe Generale is subject to certain obligations relating to the management of both environmental and social risks and human rights risks (which include modern slavery). In addition, Societe Generale is a member of Entreprises pour les Droits de l'Homme (Enterprises for Human rights), an association promoting discussions, working groups, consultations and best practice sharing in favour of an enhanced integration of human rights, including forced labour, into company policies and practices. As outlined below, AYINS adheres to certain Societe Generale policies and practices.

For AYINS, being a responsible company lies at the heart of our business. Being responsible must be tangible in each of our decisions, positions and actions. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business.

### About Ayvens Insurance

Ayvens Insurance is the trading name of Euro Insurances DAC. It is a truly international motor insurance company. Ayvens Insurance is active in 29 countries where it delivers competitive cover and easier fleet management for Ayvens clients and other large fleets. AYINS has an established UK Third Country Branch ("UK TCB") to provide customers in the UK with access to AYINS range of non-insurance classes. The UK TCB clients and insurance intermediaries are predominantly the affiliate UK Leasing entity which is LeasePlan UK Limited t/a Ayvens.

Our mission is to deliver one integrated direct insurer that serves the Group and that will drive insurance growth by fully embedding insurance into fleet management. Ayvens Insurance's vision is to become a driver-centric, data driven insurer, that innovates to take risk and service new mobility segments.

AYINS is part of the Ayvens Group operational leasing and fleet management business line of Societe Generale Group. Societe Generale has a universal banking model based on complementary businesses around the world, (including retail banking, corporate and investment banking, financial services, insurance, private banking and asset management).

### Societe Generale Group Policies and Processes

As part of the Societe Generale Group, AYINS follows Societe Generale's relevant Group-wide policies including:

- **Societe Generale's Statement on Human Rights**<sup>1</sup>
- Societe Generale's **Code of Conduct**<sup>2</sup> in which the Group undertakes to respect human rights (including those relating to the fight against modern slavery and human trafficking) and to comply with the rules established by the International Labour Organisation fundamental conventions. This Code applies to all Societe Generale Group employees. In addition, the Group expects its suppliers and those with whom it conducts business relationships to implement practices that are, or aim to be, consistent with this Code;

<sup>1</sup> <https://www.societegenerale.com/sites/default/files/documents/csr/statement-human-rights.pdf>

<sup>2</sup> <https://www.societegenerale.com/sites/default/files/documents/Code-conduct/code-of-conduct-en.pdf>

- the **Worldwide Agreement on fundamental human rights and trade union rights**<sup>3</sup> – signed between Societe Generale and UNI Global Union in 2015, and which has been renewed in 2019 and in 2023 with a new global agreement.
- **internal policies, formal processes and agreements relating to human resources** – in certain cases being submitted to trade union agreement. The Group provides its entities with normative documentation specific to the types of risks, including human rights risks. This documentation is updated, internally disseminated and accessible.
- the Group's **Policy on Responsible Sourcing & Compliance Rules Applicable to Sourcing** – which is mentioned in the UNI Global agreement;
- the Group's **Policy on the Fight Against Money Laundering and Terrorist Financing Within the Societe Generale Group** (internal document)
- the Group's **Anti-Bribery and Corruption Policy** (internal document) and a dedicated Code Governing the Fight against Corruption and Influence Peddling.

In addition to these policies, the Group is sharing best practice with peers on such issues. For example, Societe Generale is a member of “*Entreprises pour les Droits de l'Homme*” (Enterprises for Human Rights), a French association promoting discussions, working groups, consultations and best practice sharing in favour of an enhanced integration of human rights, including forced labour, into company policies and practices.

Moreover, Societe Generale is a partner of the French *Global Deal* platform, a multi-stakeholder initiative which promotes social dialogue, consultation and negotiation between or among representatives of governments, employers and workers on economic and social policy issues), as a means to achieving decent work, quality jobs and increased productivity and, by extension, greater equality and inclusive growth.

## Our Supply Chain

AYINS recognises the reliance we place upon our supply chain. We are mindful of the need to choose our business partners well, carry out appropriate due diligence before commencing a relationship, and remain alert to the indicators of modern slavery throughout our dealings.

AYINS recognises that human rights are fundamental and universal. We respect human rights, in the workplace and in our supply chain, as described in the United Nations' Universal Declaration of Human Rights and the principles of the International Labour Organization. We avoid being complicit in human rights abuses of any kind, and condemn the use of forced labour, compulsory labour and child labour. Respect for human rights is also a key feature in our Sustainable Procurement Charter (previously known as Supplier Code of Conduct) as seen at <https://www.ayvens.com/en-cp/sustainability/>.

## Ayvens Policies and Processes

The Ayvens Group Sustainable Procurement Charter outlines our value system and our principles-based approach to doing business. By incorporating the Ten Principles of the UN Global Compact into our Sustainable Procurement Charter we are not only upholding our basic responsibilities to people and planet but also setting the stage for our common long-term success.

Our Sustainable Procurement Charter and Procurement policies govern the approach we take with selecting and managing our supply chain.

Ayvens UK approach to and expectations of its UK Branch staff are governed by our policies on Equal Opportunities, Recruitment and Selection, Voluntary Leaver, Whistleblowing and in our Employee Code of Conduct. These policies are underpinned with the UK Anti-slavery Policy and have each been approved by the Senior Management of Ayvens UK to reflect our commitment to acting ethically and with integrity and to operating effective systems and controls to remove the risk of slavery and human trafficking taking place within our supply chain.

These documents provide a framework for responsible business decisions in many everyday situations faced by our employees and Suppliers. The trust and confidence placed in us by our stakeholders – our clients, shareholders, suppliers, society and our employees – is crucial to the success of Ayvens.

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<sup>3</sup> <https://www.societegenerale.com/sites/default/files/documents/2023-06/2023-global-agreement-on-the-rights-of-societe-generale-group-employees.pdf>

Only by conducting our business according to our ethical standards can we win – and retain – that trust and can we succeed in our mission of being recognised as the global leader in fleet management and driver mobility.

## Self-Assessment of the Supply Chain

The Societe Generale Group is subject to certain obligations relating to the management of both environmental and social (“E&S”) risks, which include human rights risks. The Societe Generale Group’s normative documentation governs E&S risk management in terms of sourcing and supplier relationship management throughout the Societe Generale Group. The sourcing division uses tools to identify, assess and manage E&S risks at a granular level: product or service and supplier or service provider. These tools are used for purchases made by the Paris-based Societe Generale Group Sourcing Division and at least for high-risk categories in the Sourcing function in other countries.

Some of these tools include:

- identifying the level of E&S risks for purchasing categories using the dedicated E&S risk mapping tool;
- including E&S criteria in calls for tender involving purchasing categories ranked as medium-high or high E&S risk;
- including E&S criteria in the KYS (*Know Your Supplier*) assessment for shortlisted suppliers, including verifying compliance with the E&S exclusion list;
- identifying whether a supplier represents a potential source of E&S controversy. This was reinforced in 2022, thanks to the monitoring, in a dedicated tool, and the identification and analysis of ESG controversies for suppliers assessed as posing a high environmental and social risk for procurement.

## Due Diligence & Risk Management

To demonstrate our commitment to combatting slavery and human trafficking, AYINS undertakes the following activities, both directly within AYINS itself and indirectly through our supplier chain:

- Ayvens aims to mitigate the risk of doing business with suppliers who are (controlled by) Sanctioned natural persons or legal person(s) entities. Therefore, core suppliers are subjected to a specific Sanction Only regime as per Ayvens Sanctions and Embargoes Policy. In Ayvens, all suppliers are subject to additional screening which includes screening for adverse media and enforcement notifications.
- All supplier contracts have Modern Slavery provisions incorporated through the Sustainable Procurement Charter and/or through specific contractual clauses. All Ayvens entities are required to ensure that their suppliers comply with the Sustainable Procurement Charter or demonstrate that they have equivalent provisions in their own codes of conduct. These provisions usually give AYINS the right to terminate the agreement if a supplier is found to be in breach.

## Action Taken to Address Modern Slavery

AYINS does not believe that it has any suppliers that present a greater risk than “minimal risk” of slavery and human trafficking.

AYINS will know the effectiveness of the steps that it is taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices related to AYINS or its supply chain have been identified;
- All new employees have signed the Societe Generale code of conduct and undertake mandatory compliance training courses;
- All UK TCB employees go through a strict recruitment and selection process whereby we ensure they have the right to work in the UK and have gone through the required due diligence screening. All employees are paid at least the Real Living Wage, as defined by the Living Wage Foundation (note that this is higher than the National Minimum Wage and National Living Wage as defined by the UK Government). In addition we monitor and publish our performance on gender pay gaps;
- Any adverse media reports for Suppliers in high risk areas identified as part of the Supplier due diligence process are fully investigated to ensure that there is no modern slavery or human trafficking taking place or an alternative Supplier has been used;

## Training & Awareness

We recognise that our employees have an important role in mitigating modern slavery risks within our business and our supply chain.

- All new AYINS employees have signed up to the Societe Generale code of conduct. This Code of Conduct covers the Societe Generale principles of business that all employees are expected to follow: Honesty and Trust, Respect for Law, Human Rights, and Sustainability. Non-compliance with the Code of Conduct is taken seriously and any failure to comply with the Code of Conduct may lead to disciplinary action and could include termination of employment.
- AYINS has documented policies for reporting of Incidents and Whistleblowing to facilitate the reporting of incidents with regard to modern slavery and human trafficking. AYINS has made access to its Whistleblowing facility through internal channels and also on the external website, enabling suppliers and other external parties to report incidents.
- All Euro Insurances DAC Third Country Branch employees have carried out eLearning training focusing on the risk areas for our supply chain, provided them with an understanding of the signs of modern slavery and highlighting what they can do if they suspect this is taking place.

## Future Steps

In its Modern Slavery statement for 2026, Societe Generale identified the following main actions planned as regards its processes:

### REGARDING OUR EMPLOYEES

At Group level, the main actions planned are as follows:

- Make sure that the Global Agreement on the rights of Societe Generale Group employees, signed with UNI Global Union and renewed in 2023 is well known by all our entities;
- Pursue constructive discussions with our internal stakeholders (staff representatives, employees, managers, etc.) through the various internal listening systems (culture of dialogue, Employee Barometer, Whistleblowing, etc.),
- Continue social dialogue with the various employee representation bodies on topics covered by the Duty of Care Plan.

### REGARDING OUR SUPPLIERS

The Group is planning to implement the following main actions:

- review and updating of inherent E&S risk mapping, including human rights, employment conditions risks and decent living wage review in particular for AI-related issues.
- the continuous updating of our tools to help identify, assess and manage inherent E&S risks to ensure that emerging issues related to new technologies such as AI are taken into account;
- the extension of the management of the inherent E&S risks in the sourcing acts of the new entities integrated into the Sourcing Division and the International Procurement Function if applicable;
- continuing to provide training on Responsible Sourcing and E&S risk management tools to buyers in the Sourcing Division and the International Procurement Function for the international market, as well as to entities that regularly manage their own purchasing, if they should request it;
- conducting CSR audits, jointly with other banks where possible, on suppliers presenting E&S risk factors, and following them up with action plans when necessary;
- the optimisation, in conjunction with three of our peers, of the extra-financial evaluation of our suppliers;

### REGARDING OUR PRODUCTS AND SERVICES

The Group is planning to implement the following main actions:

- continue to improve procedures for operationalizing the E&S risk management system, in particular in order to support the business units in complying with the criteria for the application of sectoral policies;
- strengthening detailed E&S analysis on human rights for large companies. In addition to the inherent E&S risks captured by the mapping detailed above, the Group is also striving to identify emerging risks related to changes in technologies and their uses and in particular risks related to the development of Artificial Intelligence. This exploratory approach has already been underway for several months and may also be

extended to other emerging technologies depending on the Group's developments and ambitions in relation to these new technologies.

- Ayvens shall, where appropriate, seek to implement relevant action plans arising from Societe Generale's work on these issues and will continue to improve the process of identifying and managing modern slavery risks from its suppliers.

The Societe Generale Group is also striving to identify emerging risks related to changes in technologies and their uses and in particular risks related to the development of Artificial Intelligence. This exploratory approach has already been initiated in recent months and may also be extended to other emerging technologies depending on the Societe Generale Group's development and ambitions on these new technologies.

AYINS shall, where appropriate, seek to implement relevant action plans arising from Societe Generale's work on these issues and will continue to improve the process of identifying and managing modern slavery risks from its suppliers.

## Conclusion

We believe that there is a very low risk of slavery and human trafficking taking place within AYINS or our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Euro Insurances DAC slavery and human trafficking statement for the financial year ending 31 December 2025.

Signed: *Val McMullan*

Date: 29/06/2026

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