

Disability and Caregiver Action Plan

1. Introduction

Promoting diversity and inclusion has long been at the heart of ABC arbitrage's commitments. These principles have been embedded for several years in both the Group's Human Resources policy and its Corporate Social Responsibility (CSR) strategy.

This 2026–2028 Action Plan for the employment and inclusion of employees with disabilities builds upon the foundations laid by the Group's first Disability Action Plan, introduced in 2024.

The previous plan (2024–2025) established the essential building blocks of our Disability Policy by raising awareness among employees, developing individual support measures, training key stakeholders across the organisation and strengthening partnerships with specialist organisations. These initial achievements created positive momentum and helped foster a more inclusive workplace culture. The purpose of this new plan is to consolidate and further strengthen that progress.

Building on these achievements, we are now taking the next step with the 2026–2028 Action Plan, which broadens the scope of our existing policy to include support for caregivers. This development reflects our ambition to go further by implementing a more comprehensive, supportive and sustainable Disability Policy.

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2. Review of the 2024–2025 Action Plan

2.1. Background and Context

Before presenting the outcomes of the 2024–2025 Disability Action Plan, it is useful to briefly revisit the principles that underpinned the initiative and the context in which this first plan was implemented.

Disability refers to situations in which a person may encounter difficulties or barriers when carrying out everyday activities, whether in their personal or professional life. Disabilities may be visible or invisible, temporary (lasting at least one year) or permanent, and their nature may evolve over time¹.

In France, nearly 12 million people—approximately one in six—live with a disability. More broadly, one person in two will experience a disability at some point during their working life, and in 85% of cases, the disability arises during the course of employment. These figures remind us that disability is an issue that may affect anyone, either directly or indirectly.

¹ source Kouide

Against this backdrop, ABC arbitrage has made disability a strategic priority within its Diversity & Inclusion commitments, in line with its people-centred culture. Convinced that diverse backgrounds and experiences are a collective strength, the Group actively promotes the recruitment, inclusion and long-term employment of employees with disabilities.

Supporting our employees—our greatest asset—is one of the key priorities of our Corporate Social Responsibility (CSR) strategy. We are committed to creating an environment that enables every employee to grow, thrive and fulfil their professional potential.

In a fast-changing sector such as financial markets, this commitment goes beyond corporate responsibility. It is also a driver of innovation, performance and attractiveness. We firmly believe that an inclusive company is a stronger company—one that is better equipped to attract, develop and retain talented people from diverse backgrounds.

While ABC arbitrage has chosen to take proactive action based on its own convictions, this commitment also reflects the French legal framework². Under French labour law, companies employing at least 20 people are required to ensure that employees with disabilities represent at least 6% of their average annual workforce, failing which a financial contribution is payable.

The 2024–2025 Action Plan represented the first major milestone in the development of our Disability Policy. Its outcomes and lessons learned now provide the foundation for our 2026–2028 roadmap.

2.2. Initial objectives

When launching its first Disability Action Plan, ABC arbitrage chose to focus its efforts on supporting employees already working within the company rather than on external recruitment. This approach reflected a clear objective: to promote job retention, strengthen individual support and lay the foundations for a more inclusive corporate culture. It also aligned with one of the key priorities of the Group's Corporate Social Responsibility (CSR) policy: supporting employees, the company's greatest asset, by creating the conditions that enable them to develop and thrive professionally.

The main objectives were structured around three key areas:

- Informing and raising awareness among employees:

The objective was to break down misconceptions surrounding disability, provide employees with the knowledge needed to encourage constructive behaviours, and promote the voluntary disclosure of disability situations, which is often hindered by a lack of awareness, stereotypes or concerns about the impact on career development.

- Supporting employees concerned:

² Article L.5212-2 of the Labour Code

The objective was to ensure active listening, personalised support and appropriate solutions in order to promote job retention and the professional development of employees concerned, while taking their specific needs into account. This support relied on close cooperation between internal stakeholders (managers, the Social and Economic Committee (CSE), Human Resources) and external stakeholders (particularly the Occupational Health Service), and could, where appropriate, result in workplace or organisational adjustments designed to promote inclusion and well-being at work.

- Training the company's key stakeholders:

Developing the skills of Human Resources teams, managers and members of the Social and Economic Committee (CSE) was considered essential to promote appropriate practices and ensure that disability situations were managed effectively. The plan also included the gradual involvement of recruitment teams in order to strengthen their ability to adopt more inclusive recruitment practices.

2.3. Actions implemented

ABC arbitration implemented all the actions set out in its first Disability Action Plan, reaffirming its commitment to creating a more inclusive working environment.

2.3.1. Individual support

The appointment of a Disability Coordinator established a clearly identified and accessible point of contact for employees. Working closely with managers, the Occupational Health Service and a disability adviser from the Occupational Health Service, several individual support initiatives were launched.

As part of this process, employees who might be concerned were offered individual meetings with the Occupational Physician and the disability adviser from the Occupational Health Service in order to listen to their needs, provide guidance and offer appropriate advice.

In addition, several applications for Official Recognition of Disability Worker Status (RQTH) were prepared, reflecting the company's commitment to providing practical and appropriate responses to identified needs.

2.3.2. Communication

This commitment was supported by clear and regular communication aimed at increasing employees' awareness of the available internal communication channels and the support measures accessible to all employees.

To increase the visibility of the initiative, the Action Plan was published on both the company's intranet and corporate website.

Several internal communications were issued throughout 2024, followed by a reminder at the end of 2025, helping to maintain momentum and progressively inform all employees.

Finally, the Disability Policy is now systematically presented during HR onboarding sessions, ensuring that all new employees are informed from the moment they join the company.

2.3.3. Training

Three training sessions were designed and delivered, bringing together 21 employees (managers, Executive Committee members, CSE representatives and members of the Diversity & Inclusion Task Force), representing 22% of our total workforce.

These groups, who play a central role in day-to-day interactions and are often involved in recruitment, strengthened their understanding of disability and inclusion issues. They now have a better understanding of the challenges involved, together with practical tools to support employees in disability-related situations.

The programme combined theoretical input, practical exercises and small-group case studies, encouraging discussion and helping participants adopt best practices.

Training materials were also shared with participants to reinforce learning beyond the training sessions.

2.3.4. Awareness

An interactive quiz made available to all employees attracted around fifty participants (approximately 56% of the workforce). The initiative aimed to challenge misconceptions, break down taboos and encourage open discussion about disability.

2.3.5. Recruitment

Although recruitment was not a priority under the first Action Plan, several measures were introduced to make the recruitment process more inclusive overall.

As part of this approach, one job advertisement was published on the Agefiph website in order to test this specialist recruitment channel and assess its relevance to our recruitment needs.

More broadly, the entire recruitment process was reviewed to better reflect our commitment to diversity and inclusion. In particular:

- job advertisements now include a clear statement of this commitment: *«Our policies promoting gender equality and the inclusion of people with disabilities are at the heart of our approach.»*
- an interview guide has been developed and shared with recruiters to remind them of the legal framework, promote best practices and encourage a respectful and inclusive approach;
- finally, the existence of the Disability Policy is now systematically mentioned during HR interviews, ensuring that candidates are informed and encouraged, where appropriate, to discuss the subject at a later stage.

In addition, the Disability Policy is publicly available on the company's website, allowing prospective candidates to learn about our commitments and practices.

2.4. Key findings and lessons learned

The primary objective of the 2024–2025 Action Plan was to encourage the voluntary disclosure of disability situations.

Several employees have since come forward to discuss their situation, and a number of applications are currently being processed. Two applications have already resulted in official disability recognition (RQTH), while others are still under review.

This positive momentum reflects growing awareness of disability issues and increasing confidence in the internal support framework.

2.4.1. Awareness: an area requiring continued focus

The communication initiatives carried out throughout the Action Plan helped raise awareness among all employees by regularly sharing information through the HR Slack channel, including key figures, definitions, best practices and updates on the company's Disability Policy.

In addition, a dedicated awareness initiative reached a significant proportion of employees (approximately 56% of the workforce).

The fact that several employees contacted the Disability Coordinator demonstrates that these initiatives were effective. They helped establish a climate of trust and encouraged employees to speak openly, even though some still do not yet feel ready to begin a formal recognition process.

2.4.2. Training: a direct impact on employee support

Training provided to managers, members of the Social and Economic Committee (CSE) and the Diversity & Inclusion Task Force proved particularly effective by strengthening their ability to identify disability-related situations, adopt appropriate approaches and direct employees to the Disability Coordinator.

This increase in knowledge and skills improved both the quality of discussions and the support provided to employees.

In some cases, the situations concerned were too temporary (less than six months) to justify an application for RQTH. In these circumstances, temporary and tailored support measures were implemented instead.

This highlights the importance of adopting a flexible and proportionate approach.

2.4.3. Emerging realities: the issue of caregiving

Several caregiving situations have emerged within the company. This confirms the need to include this topic in the next Action Plan in order to provide a clear framework and appropriate support for employees concerned.

2.4.4. Conclusion: building on positive momentum

The first Action Plan laid the foundations of our Disability Policy by strengthening communication, encouraging employees to speak openly and establishing a structured support framework.

These achievements form part of a long-term approach. Building an effective Disability Policy is a gradual process that develops over time and whose impact can only be fully assessed over the long term. Within the timeframe of an initial two-year Action Plan, the progress achieved represents important milestones in establishing a sustainable and lasting approach.

Although some objectives still need to be strengthened—such as expanding awareness initiatives and continuing to encourage official recognition procedures—the progress made demonstrates positive momentum and growing confidence in both the support framework and the people responsible for delivering it.

Looking back, the decision to focus initially on employees already working within the company has proved to be the right approach for ABC arbitrage. It has helped create a supportive environment, encouraged open dialogue and enabled the development of tailored support measures.

This approach will therefore be maintained and further strengthened under the next Action Plan.

This first review confirms that we are moving in the right direction. It also highlights the importance of consolidating the initiatives already implemented while broadening our approach to fully incorporate the needs of caregivers, which will become one of the key priorities of the 2026–2028 Action Plan.

3. 2026–2028 Action Plan

3.1. Main objectives

The 2026–2028 Action Plan builds on the foundations established by the first plan while marking a new stage in the development of ABC arbitrage's Disability Policy. Its objective is to consolidate the progress already achieved, strengthen the initiatives that have been launched and broaden the scope of our approach by fully integrating support for caregivers.

Our priority remains supporting employees already working within the company by providing an inclusive, supportive working environment that encourages employees to speak openly about their situations.

For this new period, our roadmap is structured around two strategic priorities:

A/ Deepening the integration of disability into the company's culture

By strengthening awareness, communication and support measures in order to maintain and further improve the conditions that encourage voluntary disclosure, long-term inclusion and professional development and fulfilment.

B/ Recognising and supporting employee caregivers

By establishing a clear internal framework, providing appropriate resources and helping employees achieve a better balance between their professional and personal responsibilities.

Alongside these priorities, recruiting new talent with disabilities remains a secondary objective and will continue in parallel. A dedicated review will identify the most appropriate initiatives and recruitment channels to progressively strengthen our attractiveness to these candidates.

3.2. Key stages of the Action Plan

3.2.1. Building on existing achievements: deepening the integration of disability into the company's culture

3.2.1.1. *Communicating the Policy and embedding the approach*

The first priority is to ensure that the Disability and Caregiver Policy is visible, accessible and fully understood by all employees.

The Policy will first be presented to senior management before being formally communicated to all employees. This communication will introduce the inclusion of caregivers within the scope of the Policy and reaffirm the commitments made by the company.

Key reference documents (the Policy, procedures and practical guidance) will be brought together on the company intranet, and the Policy will be incorporated into HR onboarding sessions.

To embed the initiative over the long term, an ongoing communication programme will be implemented through a variety of complementary formats, including:

- regular messages on Slack;
- a range of engaging content, including employee testimonials, key figures and themed features;
- an internal communication plan running through to 2028 as part of the Diversity & Inclusion programme, including regular reminders and themed communications dedicated to disability and caregiving.

The objective is to create a working environment in which disability and caregiving remain visible topics in everyday company life, making it easier for employees to speak openly and encouraging collective ownership of the initiative.

3.2.1.2. Strengthening employee awareness

Following an initial phase focused on providing general information internally, the 2026–2028 Action Plan introduces a more practical and impactful approach to awareness-raising.

To encourage greater personal engagement and strengthen collective commitment, ABC arbitration will involve specialist external speakers. These initiatives may include practical workshops, experience-sharing sessions or inspiring testimonials from individuals whose professional journeys resonate with our own business activities.

The objective is to raise awareness among at least 85% of employees over the three-year period.

The initiative selected for each Business Plan will be included in the training budget for the relevant year.

3.2.1.3. Continuing to train key stakeholders

The previous Action Plan launched a training programme for managers, members of the Executive Committee, members of the Social and Economic Committee (CSE) and the Diversity & Inclusion Task Force.

Building on this foundation, the 2026–2028 Action Plan provides for the systematic inclusion of new managers, line managers and newly appointed CSE members in the training programme. Each year, where more than four new participants are concerned, a dedicated training session will be organised to ensure a consistent level of knowledge and skills.

The objective is for all managers to have the knowledge and skills required to fully fulfil their role within the Disability and Caregiver Policy and to actively promote the initiative within their teams.

3.2.2. Broadening our policy: recognising and supporting employee caregivers

3.2.2.1. Who is a caregiver?

A caregiver is *"a person who regularly and frequently provides unpaid assistance to help another person carry out all or part of the activities of daily living because of age, illness or disability"*³.

Within the workplace, this most often refers to an employee who supports a parent, child, spouse, sibling or another relative experiencing illness, disability or loss of independence.

This role is often undertaken informally and may create a significant physical and emotional burden, with direct consequences for working life, including lack of time, fatigue and stress. On average, caregivers devote approximately seven hours each week to these responsibilities.

³ source [monparcours handicap.gouv](https://monparcours handicap.gouv.fr/)

3.2.2.2. Why include caregivers in our policy?

Caregiving is becoming an increasingly significant reality in the workplace:

- by 2030, one employee in three is expected to have caregiving responsibilities;
- 75% of caregivers believe that this role has a negative impact on their professional life;
- four employees out of ten have already given up a professional opportunity because of their caregiving responsibilities;
- the average age of caregivers (33 years) closely matches the demographic profile of ABC arbitrage's workforce.

These findings demonstrate that caregiving is a major issue for quality of working life, sustainable performance and job retention.

Although there is currently no legal obligation for companies to provide specific support for caregivers, French legislation already grants several individual rights to employees concerned, including caregiver leave, family solidarity leave and leave donation schemes.

Against this background, and in line with its CSR commitments, ABC arbitrage has decided to broaden its Disability Policy to fully include employees with caregiving responsibilities. The objective is to help them balance their caregiving responsibilities with their professional life while preserving their health, well-being and long-term employability.

3.2.2.3. Our actions for 2026–2028

To fully integrate caregivers into our policy, ABC arbitrage is committed to implementing a number of concrete initiatives:

A/ Recognising caregiver status and establishing a clear internal framework:

- formalise an internal definition of the caregiver role;
- adapt the support network and available resources (Disability Coordinator, Human Resources, practical guidance and external contacts);
- clarify referral and support arrangements.

B/ Create a "Caregiver Toolkit" on the intranet, including:

- practical guidance on employees' legal rights;
- information on the internal support measures available;
- useful contacts and specialised external resources.

C/ Introduce dedicated support measures:

- an annual budget of €4,000 to finance external services or support, particularly to help reduce the administrative burden associated with caregiving;

- the possibility of flexible working arrangements, including remote working and adjusted working hours, to help employees balance their professional responsibilities with their caregiving role;
- a feasibility study into the introduction of an employee leave donation scheme.

D/ Integrating caregiving into the overall Disability Policy

The communication, awareness-raising and training initiatives described in Part I will now fully incorporate the topic of caregiving.

This cross-cutting approach will ensure that caregiving becomes a lasting component of our culture of inclusion.

3.3. Exploring new opportunities

In addition to the initiatives set out in this Action Plan, a number of topics deserve further consideration over the coming years. These do not constitute formal commitments but rather areas for reflection that may further strengthen our Disability and Caregiver Policy where their implementation proves appropriate.

3.3.1. Assessing needs and applicability across our subsidiaries

At present, support provided within our subsidiaries is managed on a case-by-case basis and has not yet been fully embedded into their local practices.

To assess whether a more structured approach would be appropriate, an exploratory review will be carried out with the aim of:

- analysing local legal frameworks and any obligations relating to disability or caregiving;
- reviewing the practices adopted by comparable companies in the countries concerned;
- conducting an internal assessment led by the Disability Coordinator.

Discussions with the management teams of our subsidiaries will then help determine whether dedicated initiatives should be introduced, while ensuring alignment with the policy implemented in France.

3.3.2. Strengthening our external initiatives: recruitment and partnerships

Alongside our internal initiatives, it is important to explore external opportunities that could further strengthen our inclusion policy. This work will focus in particular on:

- inclusive recruitment, by identifying the specialist recruitment channels, platforms and initiatives best suited to our business in order to attract talented candidates with disabilities;

- strategic partnerships, by identifying and engaging with associations, specialist organisations and professional networks that can provide additional resources, strengthen our employer brand and enhance our support initiatives.

The purpose of this exploratory work will be to assess how these external initiatives can effectively complement our internal actions and contribute to achieving our inclusion objectives.

4. Conclusion

This new 2026–2028 Action Plan fully builds on the previous plan while marking an important milestone in the development of our Disability Policy.

It reflects our determination to embed this approach sustainably within the life of the company by renewing our commitment to encouraging voluntary disclosure through a wider range of communication, training and awareness initiatives, while extending the scope of the policy to include employees with caregiving responsibilities and fully integrating them into our overall approach.

The implementation of these initiatives will follow a detailed multi-year roadmap, presented in Appendix 1 in the form of a timeline. This will enable everyone to understand the key stages, milestones and priorities of the Action Plan over the 2026–2028 period.

At the end of the Action Plan, the Disability Coordinator will prepare an overall review, which will be presented to both the Social and Economic Committee (CSE) and Senior Management.

As with the previous plan, a comprehensive assessment of the initiatives implemented and the evolving needs identified will help refine our policy and define future priorities.

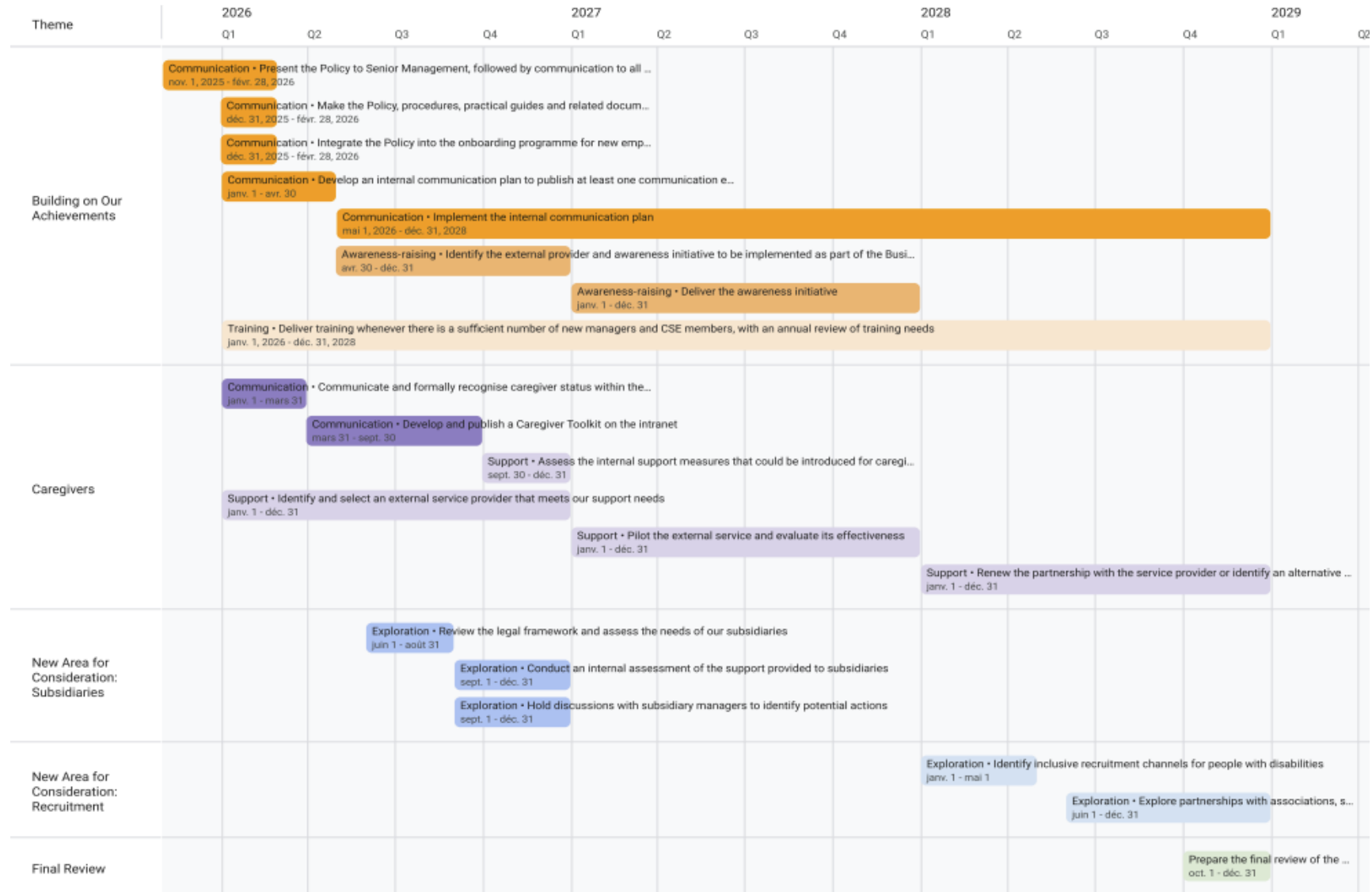
The success of this initiative depends on the commitment of everyone within the company.

The Disability Coordinator and the Human Resources team remain available to answer questions and welcome suggestions and feedback. Employees may also seek support from the other stakeholders involved in this initiative, including members of the Social and Economic Committee (CSE), managers, the Diversity & Inclusion Task Force and the Occupational Health Service.

A full list of these contacts is provided in Appendix 2.

Appendix 1 – Timeline of the 2026–2028 Action Plan

This timeline outlines the main stages in the implementation of the Disability and Caregiver Action Plan for the 2026–2028 period. Its purpose is to provide an overall view of the planned implementation schedule and to facilitate understanding of the Action Plan's key milestones. This timeline is indicative and may evolve depending on identified needs, employee feedback, organisational priorities or operational constraints encountered during implementation.



Appendix 2 – Key contacts

An employee's decision to inform the employer, or any of the people listed below, of their disability status is entirely voluntary. Any information shared with one of the stakeholders listed below will be treated as strictly confidential. Employees remain entirely free to decide whether or not to discuss their situation with their manager, colleagues or anyone else.

- Disability Coordinator
- Occupational Health Service
- Agefiph
- Social and Economic Committee (CSE)
- Diversity & Inclusion Task Force

Annexe 3 - Executive Summary

ABC arbitrage is continuing its commitment to inclusion through a new 2026–2028 Action Plan, building on the first Disability Action Plan implemented during 2024–2025.

Building on the progress already achieved—including individual support, manager training and the gradual engagement of employees—this new Action Plan aims to strengthen the momentum that has been established while extending the scope of the policy to include caregivers, whose growing needs represent an increasingly important issue.

Review of the 2024–2025 Action Plan: strong foundations

The first Action Plan established a solid framework through:

- the appointment of a Disability Coordinator and the implementation of several individual support measures;
- two voluntary applications resulting in official disability recognition (RQTH);
- progressive awareness-raising among employees (over 70% of the workforce) through internal communications;
- the first training programme (22% of the workforce), involving the Executive Committee, managers, the Social and Economic Committee (CSE) and the Diversity & Inclusion Task Force;
- improvements to the recruitment process to make it more inclusive (inclusion statement in job advertisements, objective assessment grids and a pilot job posting on a specialist recruitment platform);
- the establishment of a climate of trust encouraging employees to voluntarily disclose disability situations.

These achievements confirm both the relevance of our approach and the importance of continuing to build on this momentum.

Objectives of the 2026–2028 Action Plan

Deepening the integration of disability into the company's culture

- strengthen internal communication;
- enhance awareness through more practical initiatives, including testimonials and specialist external speakers;

- provide systematic training for managers and members of the Social and Economic Committee (CSE);
- strengthen existing internal support measures.

Recognising and supporting employee caregivers

- establish a clear internal framework defining caregiver status;
- create a Caregiver Toolkit on the company intranet;
- introduce dedicated support measures, including an annual budget, flexible working arrangements and adjusted working hours;
- fully integrate caregiving into all disability-related initiatives, including communication, training and support.

Summary of the main initiatives

- structured communication: official launch of the policy, quarterly communications, educational content (employee testimonials, themed articles and key figures), and integration into the onboarding process;
- enhanced awareness: objective of reaching 85% of employees through practical and engaging initiatives;
- ongoing training: systematic inclusion of new managers and newly appointed CSE members;
- caregiver support measures: annual budget of €4,000, Caregiver Toolkit, personalised support and exploration of an employee leave donation scheme;
- exploratory initiatives: potential extension to subsidiaries, external partnerships and the development of inclusive recruitment initiatives.

Our vision

This 2026–2028 Action Plan forms part of a long-term and proactive approach aimed at making inclusion one of the pillars of ABC arbitrage's corporate culture.

It reinforces a culture based on openness, listening and support for individual situations while fully integrating an increasingly important societal issue: caregiving.