

# **Inetum Group Code of Ethics**

Date: February 24 Classification: Public

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### 1. The Group's ethical values

The ethics of the Inetum Group<sup>1</sup> are expressed through fundamental Ethical Values which are intended to guide the working behaviour of all employees: **respect for others**, **integrity**, **responsibility**, **loyalty**, **trust and objectivity**.

Respect for others means respecting the dignity and integrity of others, their opinions and culture, regardless of their social, cultural, ethnic or national origins, religious or other beliefs, sexual orientation, physical or mental condition, age or trade union membership. It is also a profound belief in equal rights and opportunities and a desire to promote diversity within the Group.

Integrity means conducting our business in accordance with business ethics and the laws and regulations applicable to our activities. In particular, it means refusing to engage in any behaviour aimed at corrupting or allowing oneself to be corrupted, creating a conflict between our personal interests and the interests of the Group, or having the effect of distorting fair competition between market players. Finally, integrity also means transmitting sincere and accurate information.

**Responsibility** means the ability to take on a task, a role, a mission or an action, and to be accountable for it to others. Responsibility also means accepting the consequences of one's actions and words where appropriate.

Loyalty and trust means carrying out one's mission conscientiously and rigorously, so that everyone knows that they can be counted on, but that they can also count on others. It is also the desire to ensure that decisions are taken as close as possible to those who will have to implement them. Loyalty also means always acting in the Group's best interests.

**Objectivity** means considering and analysing situations and circumstances as impartially and factually as possible.

<sup>&</sup>lt;sup>1</sup> The "Inetum Group", "Inetum" or the "Group" is defined as all the companies controlled by Inetum S.A.S.



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# 2. What does this Code of Ethics consist of? Who is it for? How is it implemented?

#### 2.1 What does this Code of Ethics consist of?

#### What our Code of Ethics does:

• It expresses our respect for the law and for people, as well as our responsibilities towards our colleagues, the Group's other stakeholders and our customers, partners and suppliers.

#### • It is the foundation...

#### ... Of our ethical culture.

As a basic principle, we respect the international, European, national and local laws and regulations of the countries in which we operate, and we make the necessary commitments to comply with them.

... Of the Group policies and procedures designed to provide a more precise framework for the subjects covered.

Consequently, in addition to the Code of Ethics, all Group employees, managers and corporate officers are required to comply with the aforementioned policies and procedures, which are universally applicable within the Group. In the event of any contradiction between this Code of Ethics and the policies and procedures derived from it, the Code of Ethics shall prevail.

• It sets out the guidelines defining the behaviour expected of employees, managers and corporate officers.

Under no circumstances can the objective of performance justify a breach of the rules set out in this Code: we must respect the Code of Ethics, regardless of the place, context or economic situation in which we find ourselves.

#### What our Code of Ethics does not do:

Under no circumstances does the Code replace or contradict the legislative, regulatory and statutory provisions that apply to the Group. It is intended to be used in addition to any

The purpose of the Code is not to provide for everything: in some cases, it can be difficult to exercise judgement correctly and because you are in a grey area, there is a risk of



legally or conventionally binding provisions, where these exist.

breaking the law, sometimes without even being aware of it. In this type of situation, any breach could compromise our ethical culture, damage the Group's reputation and possibly result in substantial sanctions.

#### 2.2 Who is it for and what is our role?

The Code of Ethics applies to all employees, managers and corporate officers of all Inetum Group companies. It applies to each and every one of us, line managers and employees, at all levels within the Group. It is therefore the responsibility of all employees, managers and corporate officers to familiarise themselves with this Code and to apply it.

#### **Important information:**

**If you are a line manager or team leader**, you are responsible for ensuring that the Code of Ethics is disseminated, understood and applied within your team.

Accordingly, this Code of Ethics is legally enforceable against Inetum Group employees, managers and corporate officers, in accordance with the law applicable in each country in which the Inetum Group operates.

#### 2.3 How is it implemented?

All employees, managers and corporate officers must be aware of this policy and be informed of its existence as soon as they are recruited.

It must also be available to them at all times.

## 3. Speak up

If an employee, manager or corporate officer of the Group believes that a **law**, **regulation**, **international agreement** or one of the principles set out in this **Code of Ethics** has been breached, he or she may report the matter freely and at no cost by sending an alert on the **Whispli platform** available at the following address:

#### https://inetum.whispli.com/speakup

#### What guarantees do you have?

- Alerts and your personal data are collected and processed confidentially and securely by members of the Compliance team.
- **Retaliation** against bona fide whistleblowers and their facilitators is prohibited.

#### Good to know:

- You can submit an alert anonymously.
- Before submitting an alert, please read the internal alert procedure available on the Whispli platform.
- Whispli is in no way a **substitute for** other ways of raising an alert: if you prefer, you can contact your line manager or your human resources manager.



• **People outside the Group** (customers, suppliers, subcontractors, etc.) can also use the internal whistleblowing channel in accordance with the law and the internal whistleblowing procedure, which can be consulted on Whispli.

#### **Important information:**

Inetum relies on its employees to use this tool wisely **and in good faith**. It is not a helpline for complaints, nor is it a platform for raising issues relating to performance appraisal, pay and career development.

#### 4. And in concrete terms?

#### 4.1 Respect for fundamental rights

The Group is committed to respecting and promoting the fundamental rights enshrined in the Universal Declaration of Human Rights, the dignity and worth of the human person and equal rights for men and women.

As the Group vigorously opposes attacks on human dignity, it applies, among other things, local, national, European and international legislation and regulations relating to child labour and all forms of forced or compulsory labour.

We are also committed to respecting the freedoms of association and collective bargaining.

#### 4.1.1 Health and safety

The Group is committed to ensuring health and safety to protect the health and physical and mental integrity of its employees, whether they work on its own sites or those of its customers.

#### What is expected of me?

- I must know and comply with the health and safety measures and emergency procedures applicable both within the Group and at my customers' sites, which are communicated to me in accordance with current legislation.
- I must identify and report to the person in charge of health and safety at local level or to our line manager any behaviour likely to represent a danger or risk and any situation likely to jeopardise the health or safety of the Group's employees.

#### 4.1.2 Equal opportunities and promoting diversity

All employees are entitled to equal opportunities and fair treatment, and to recognition and development of their individual skills.

The Group encourages diversity, convinced that it is a source of wealth, and is committed to practising no form of discrimination or harassment.

The various processes that support the career path are regularly reviewed in the light of this challenge.



We all play a part in promoting diversity and respecting each other, so any employee who notices a failure to meet these challenges is invited to report it to his/her line manager or Human Resources contacts.

The Group sees to it that:

- Equal opportunities and fair treatment are provided, regardless of social, cultural, ethnic or national origin, religious or other beliefs, caste, marital status, pregnancy status, sexual orientation, disability, age or trade union membership;
- The work environment is free from harassment, in particular intimidation, sexual advances, threats and acts of violence: all employees are entitled to respect for their fundamental rights, in particular those relating to human dignity and protection against all forms of violence or harassment.

#### What is expected of me?

- I assess the members of my team on objective criteria to give everyone the same opportunities: according to their skills, their attitude and their professional results.
- I must not tolerate any joke, word, gesture or behaviour that could constitute discrimination, harassment or violence in the workplace.
- I cooperate with my colleagues and respect them, regardless of any differences they may have with my lifestyle, culture, generation or personal opinions.

#### 4.2 Ethics in our activities

#### 4.2.1 Our contractual commitments and compliance with laws and regulations

**Each of us must ensure that our actions comply with the legal provisions applicable in the country in which we are located**, on pain of sanctions for ourselves, the Group, its officers and directors and, potentially, the Group's business partners (customers, partners, suppliers, subcontractors, etc.).

Each of us must also ensure that we act in accordance with the contracts entered into with customers, suppliers, partners, subcontractors, co-contractors and, more generally, with anyone who has entered into a contract with the Group. Inetum may be held liable for failure to comply with the contractual terms and conditions, whatever their nature, amount or scope.

#### **Important information:**

Non-compliance with applicable regulations or legislation, as well as with contracts binding Inetum, may give rise to Inetum's liability and cause significant damage to the Group, such as:

- An order to pay damages, fines or criminal penalties to the company, Inetum's directors and/or employees at fault;
- Damage to Inetum's image or reputation;
- Termination or non-renewal of contracts with customers, suppliers and partners;
- Prohibition on bidding for public contracts;
- And so on.



- I must ensure that I act in accordance with the laws and regulations applicable to the country in which I am located and to the operations in which I am involved.
- I must be aware of Inetum's contractual commitments governing my activity or operation and comply with them.
- I have to follow the training courses provided by the Legal Department, Contract Management and Compliance.
- If in doubt, I must consult the Legal and Compliance Department before acting or committing myself.

#### 4.2.2 Fair competition

The Group conducts its business, innovates and develops in a fair manner, respecting the principle of freedom of trade and industry and refraining from undermining free competition by infringing competition laws and regulations in the countries in which we operate. The Group's policy is one of "zero tolerance": such behaviour is unacceptable.

Although competition law varies from country to country, certain practices are commonly prohibited.

#### **Examples:**

Agreements (written or oral) to fix prices, share customers or markets, coordinate offers, establish boycotts or exclude competitors are not permitted.

Implementing practices that restrict our employees' freedom to work and change employer is also prohibited.

In addition, we must not discuss, give or exchange information with our competitors on:

- Price and terms of sale;
- Distribution of markets and customers (whether by geographical area, type of product or other means);
- Costs;
- Salaries;
- Strategy;
- The choice of partners;
- Profits, sales volumes, market share and margins.

The Group has adopted a specific policy on this subject, which is available to all employees.

- I must read, understand and apply the rules set out in the Group policy on anticompetitive practices, which is available to employees.
- I should ask the Legal and Compliance Department for help if I have a question or doubt about the application of these rules in a given situation.
- I must be attentive to the nature of my relations with the Group's competitors at conferences, events, meetings of professional associations or other gatherings of any kind, in order to avoid any suspicion of infringement of competition rules.
- I must not use illegal or unethical means to obtain information about competitors, customers or suppliers.
- I must be aware that any verbal or written exchange with competitors may be prejudicial to the Group under competition law.



#### 4.2.3 Corruption

The Group firmly condemns all forms of corruption, regardless of the country in which we operate. The Group's policy is one of "zero tolerance": such behaviour is unacceptable. It may be reported to the authorities and prosecuted.

#### What is corruption?

Corruption is generally defined as the act of **promising or paying anything of value** to a public official or any private person **in order to obtain an undue advantage**, such as inducing them to act in a manner favourable to or avoid acting in a manner unfavourable to the Group or its customers.

#### **Examples of strictly prohibited practices:**

- ⇒ Offering, promising or giving money or any other thing of value (such as a luxury item) in order to obtain any advantage for the Group, to a public official, a political party, a player in political life, a trade union representative, a trade union, a charity or similar organisation, or an employee or representative of another company.
- ⇒ Accepting or soliciting money or anything else of value (such as a luxury item) that could cause us to breach anti-bribery laws and regulations or be perceived as an act of passive bribery.
- ⇒ Using intermediaries without verifying their integrity or reputation, without ensuring that the intermediary services provided are genuine and that the remuneration is reasonable and appropriate, and without the Group's agreement.
- ⇒ Making donations to political parties, foundations or associations in the name of Inetum without the prior agreement of the Legal and Compliance Department and management.

The Group has adopted a set of policies and procedures on this subject, which are available to employees.

#### What is expected of me?

- I must read, understand and apply the rules set out in the Group's anticorruption policy and related procedures (Gifts and Hospitality procedure, procedure on intermediaries) which are available to employees.
- I have to follow the training provided by the Legal and Compliance Department on this subject.
- I should ask the Legal and Compliance Department for help if I have a question or doubt about the application of these rules in a given situation.

#### 4.2.4 Conflicts of interest

We must avoid putting ourselves in situations where our individual interests may conflict with those of the Group.

#### What is a conflict of interest?

A potential conflict of interest arises when we have conflicting interests at the same time. When a personal interest conflicts with the Group's interests, we risk breaching our duty of loyalty.



This is the case whenever the possibility of personal gain, direct or indirect, influences or may influence a decision relating to our professional activity.

#### **Examples of strictly prohibited practices:**

- Accepting or acting as a **director** or officer of **any competitor, customer or supplier** of the Group unless expressly authorised by the relevant hierarchical authority;
- ⇒ To hold **an interest in** any form whatsoever in a **competitor of** the Group, except for purely financial investment purposes with no power of control;
- ⇒ Establishing **business relations on behalf of the Group with a close relative** (family, friends, etc.) directly or indirectly (controlled company) unless expressly authorised by the competent hierarchical superior;
- ⇒ Carrying out a **professional activity** during the performance of his duties within the Group that **competes** with the Group.

#### What is expected of me?

- I must not get involved in outside activities that compete with the Group or help its competitors.
- I must report any potential conflict of interest to my line manager and to the Legal and Compliance Department.
- I must conduct my business negotiations solely on the basis of the Group's interests and not on the basis of any personal advantage or interest that my personal relations may derive from them.
- I must not use or disclose any information or business opportunities obtained at work for personal gain or advantage.
- If I am not sure whether I'm in a potential conflict of interest situation, I should talk to my line manager and the Legal and Compliance Department.

#### 4.2.5 Combating money laundering and the financing of terrorism

#### What is money laundering?

Money laundering refers to the process of **reintroducing the proceeds of illegal activities** (such as corruption or tax fraud) **into the legal economy**. This is a criminal offence.

The reintroduction into the legal economy of funds derived from illicit activities can take various forms and use various channels. Each and every one of us therefore has a duty to exercise the utmost vigilance when carrying out a financial transaction with any third party, especially if the origin of the funds or the identity of the third party is in doubt.

- I check the real identity of any third party with whom a financial transaction (e.g. payment for a service) is to take place.
- I refuse to accept any payment in cash, unless expressly authorised by my line manager.



• If any element of a transaction appears suspicious or inappropriate, or likely to breach applicable anti-money laundering or anti-corruption laws and regulations, I will inform my line manager and the local Compliance Officer.

#### 4.2.6 Economic sanctions and export controls

The Inetum Group must comply strictly with sanctions imposed on certain persons, entities or countries and with export control regulations.

#### What are economic sanctions?

Certain countries, territories, entities or individuals are subject to **economic sanctions** (e.g. embargoes, asset freezes) imposed by other countries or organisations such as the European Union or the Office of Foreign Assets Control (OFAC) in the United States.

#### What is export control?

Certain products or services are subject to special regulations when they are to be exported or re-exported. At Inetum, these products or services can be considered to **have both civilian and military uses**, i.e. depending on who owns or uses them, they can be used for either purpose.

Each of us must therefore:

- Refrain from entering into business relations of any kind with any company, entity or person subject to an international sanction or representing a sanctioned entity, organisation, country or territory;
- Comply with export control regulations.

#### What is expected of me?

- I must refrain from entering into a business relationship with or responding to a call for tenders from a company, entity, organisation or person subject to an international sanction.
- I need to know whether the product or service I am selling to my customer is subject to export control regulations.
- I must read, understand and apply the rules set out in the Group policy on international sanctions and export controls, which is available to employees.
- I should ask the Legal and Compliance Department for help if I have a question or doubt about the application of these rules in a given situation.

#### 4.2.7 The sincerity and accuracy of commercial and financial information

The Group ensures that it prepares and disseminates commercial and financial information that is fair and accurate, transparent and timely. Documents concerning the Group must also be handled with the greatest care and to the best of the Group's knowledge.

In terms of communication, all employees must contribute to the transmission to the Finance Department of all information and documentation concerning them, so that the transactions recorded and communicated are sincere and accurate.

Furthermore, the falsification or manipulation of information may constitute fraud and, as such, may result in sanctions by the Group as well as civil and criminal penalties.



#### What is expected of me?

- I must not produce or transmit any document or information likely to deceive or mislead its recipient.
- I must obtain the necessary authorisation from the Finance Department before responding to financial enquiries, whether internal or external.
- I must keep confidential business information (including back-ups) in a safe place.
- I have to comply with financial reporting procedures and internal control rules.

#### 4.3 Relations with our commercial partners

The Group's relations with its partners are conducted in a spirit of loyalty, fairness and respect for competition.

Each of us must always be transparent, fair and honest with our business partners, whoever they may be.

#### 4.3.1 Relations with our customers

We work closely with our customers to create value by harnessing our knowhow and expertise, while at the same time ensuring sustainable, profitable growth for the Group.

The Group is committed to working honestly, fairly and respectfully with all its customers, providing them with quality products and services. We build lasting, individualised and personalised relationships based on mutual trust.

The Group expects its customers to behave in a way that meets its expectations from a commercial, legal and ethical point of view.

#### What is expected of me?

- I behave ethically and responsibly towards my customers.
- I do not advise my clients to do something if I think it's against their interests.
- I communicate openly with my customers. I am transparent and I tell them the truth. If I have bad news or sensitive information to pass on to a customer, I ask my line manager for advice on how to communicate openly with my customer about it.
- If my customer acts unethically, I report it to my line manager and the Compliance Officer or on Whispli (see §4) to get the right recommendations.

#### 4.3.2 Relations with our partners

We work with our partners and ecosystems to add value for our customers, ethically and legally.

We are transparent with our customers about our relationships with our partners and ecosystems. Our customers must be informed of any commercial relationships and referral fees relating to the services we offer them. Information to the customer must be communicated in writing and indicated to the customer from the outset in the contractual conditions.

We know that with public sector clients, it may be illegal in some countries to charge referral fees.



#### What is expected of me?

- I must not enter into an agreement with a partner that runs counter to my client's interests.
- I must not enter into an agreement with a partner that would breach the law.
- I have to work ethically with our partners and our ecosystems, and ensure that customers are informed of this collaboration.

#### 4.3.3 Relations with our suppliers

The Group undertakes to treat its suppliers and subcontractors fairly and ethically and expects its suppliers to treat Inetum in the same way.

We strongly recommend that you do not enter into reciprocal agreements such as, for example, agreeing to buy from a supplier on condition that they buy from us.

#### The Sustainable Procurement Charter

The Group's Sustainable Procurement Charter makes it possible to integrate ethical, legal, social and environmental criteria into the purchasing policy and expresses the Group's expectations of its suppliers.

⇒ It defines the behaviour to be adopted, particularly in the areas of employment, industrial relations, the environment, the fight against corruption, customer interests and competition.

Through this Sustainable Procurement Charter, which is integrated into the contractual provisions binding Inetum and its suppliers, the Group aims not only to share its commitment with its suppliers, but also to meet the increasingly high expectations of its customers in terms of business ethics and social and environmental responsibility.

#### What is expected of me?

- I must treat suppliers fairly and base my decisions on quality, price and the supplier's commitments in terms of business ethics and CSR.
- Under no circumstances must I agree with our suppliers to do anything that would be contrary to the interests of our customers.
- I must not enter into agreements with our suppliers that infringe the law of the country or countries in which I work.
- If I use a supplier, I must include the Sustainable Procurement Charter in the contract between Inetum and the supplier.
- I do not enter into reciprocal agreements unless specifically authorised by the Procurement Department and/or the Legal and Compliance Department.

#### 4.4 Group and third-party assets

#### 4.4.1 Intellectual property

We must respect the intellectual property rights of our customers, competitors, business partners and suppliers. We must not jeopardise any intellectual property of the Group, its customers, competitors, business partners or suppliers, whether legally protected or not, both during our employment with the Group and after we leave.



All intellectual property created by Group employees during their period of employment with the Group becomes the property of either the Group or the customer concerned, depending on the terms of the contract concluded with the customer.

#### What is expected of me?

- I must be aware of and comply with the provisions applicable to intellectual property not only in my employment contract, but also in the contracts between Inetum and its clients, business partners and suppliers, within the framework of which I act.
- I must read and comply with the licence conditions of the publishers to whose solutions Inetum subscribes.
- If I have any doubts or questions, I contact the Legal and Compliance Department.

#### 4.4.2 Confidential information

The confidential information of the Group, its employees, customers, business partners and suppliers must be protected against any disclosure, whether accidental or deliberate.

#### What information is often confidential?

"Confidential" information is defined as such by law or contract. The following categories of information are almost always confidential:

- Any information given by our customers, suppliers or business partners that the Group has undertaken not to disclose.
- Information relating to our commercial and economic strategy.
- Information on our recruitment and remuneration policy.
- Personal data.
- Know-how, industrial secrets, patents and software developed by the Group.

We must strictly comply with the confidentiality undertakings given by the Group to its customers, business partners and suppliers. When we work for several different customers, we must take the necessary protective measures to prevent the disclosure of confidential information from one customer to another.

At the end of our employment contract with the Group, we must return all confidential information in our possession and comply with our confidentiality obligations.

- I must not divulge any confidential information about the Group, its customers, business partners or suppliers to persons who have no need to know.
- I must not disclose any confidential information about the Group, its customers, business partners or suppliers on public sites, platforms, tools or forums.
- I must be aware of and respect the confidentiality undertakings given by the Group.
- I must avoid discussing confidential information in public if I risk being overheard.



• At the end of my employment contract with Inetum, I must return or destroy any confidential information.

#### 4.4.3 Protection of personal data

Each of us must comply with the regulations governing the protection of personal data, whether this concerns data held by other employees, or data from our customers, business partners or suppliers.

#### What is "personal data"?

The concept of personal data is very broad, since it covers any type of data that makes it possible to identify an individual, directly or indirectly.

⇒ As a result, the concept of personal data is not limited to information such as surname, first name and e-mail address, but also includes connection information or IP addresses, since these make it possible to identify an individual indirectly.

#### What is "processing" of personal data?

Similarly, the concept of "processing" personal data is very broad, since - depending on the legislation - it covers virtually every type of technical act that can be carried out on personal data, from modification and deletion to simple consultation on a screen.

#### **Important information:**

We must bear in mind that the regulations governing personal data in the European Union aim to provide maximum protection for individuals.

However, data protection is not just a matter for the European Union: more and more countries are adopting legislation in this area, often based on European standards, which are currently the highest in the world.

The Group is also committed to complying with national, European and international legislation and regulations on the protection of employees' personal data, to ensure that their privacy is protected.

The Group has adopted a set of rules and procedures that are accessible to employees, enabling them to know how to take account of personal data protection requirements in their operations. The aim of these rules and procedures is to establish a minimum standard unifying practices within the Group.

- I must take the data protection training provided by the Quality and Security Department.
- I must be aware of and comply with the Group's internal procedures and rules applicable to the protection of personal data accessible to employees.
- I must be aware of and respect the commitments that Inetum has made to its customers, business partners and suppliers concerning the processing of their personal data.
- I must treat personal data as confidential information.



- I only collect personal data for a specific reason, and I make sure that I only collect data that I strictly need: I do not collect personal data "just in case" it might prove useful in the future.
- I must document the data processing actions that I initiate appropriately, using the tools provided by the Quality and Security Department.
- I must comply with the personal data protection legislation of the jurisdictions in which the data was collected, processed or used.
- If I have any doubts or do not understand anything, I contact my Data Privacy Officer or the Legal and Compliance Department.

#### 4.4.4 Protecting the Group's assets and those of third parties

The assets and resources of the Group and third parties must be protected. These assets must be used in accordance with the guidelines laid down by the Group or by the third party with whom we are working (customer, business partner, supplier) and special care must be taken to protect them as if they were our own.

The Group has adopted a set of security rules and procedures, accessible to employees, designed to protect the Group's information systems and the data stored, processed or transmitted on them. We must comply strictly with all these rules and procedures.

We must not access, use or attempt to use the Group's or third parties' electronic resources to access, store, distribute or publish inappropriate content. This applies in particular to content that is pornographic, obscene, racist, sexist or, in any other way whatsoever, discriminatory, threatening, harassing, offensive, defamatory or unlawful.

We must take the necessary measures to protect against loss, theft, destruction, damage or unauthorised disclosure, all assets and resources belonging to the Group and/or to third parties and which are under our responsibility.

In addition, the misappropriation and manipulation of the Group's assets or those of third parties may constitute fraud and, as such, may result in sanctions by the Group as well as civil and criminal penalties.

Finally, subject to applicable laws and regulations and to Inetum's contractual commitments, Inetum may access all files, documents, data and information generated, processed or stored using or on the Group's IT resources.

#### What is expected of me?

- I must treat assets entrusted to me by the Group or by customers, business partners and suppliers with care and take steps to protect them against theft, loss, destruction, damage or unauthorised disclosure.
- I must use these assets and resources for business purposes only, with the exception of occasional personal use, which is permitted.
- I must be aware of and comply with the charters, regulations, procedures and rules governing the security of information systems.

#### 4.5 Social and environmental responsibility

#### 4.5.1 Our positive social impact

Our international presence is based on a vast territorial network that puts us at the heart of the regions, while our business sector is expanding. This gives us a key social role.



The Group is keen to make the most of this and to have a positive impact on the areas in which it operates, and plays an active role in social life by supporting a large number of local associations through partnerships and sponsorship.

One of the aims of these partnerships is to contribute to the sustainable integration of disadvantaged groups. In this way, the Group is building dedicated training programmes that create opportunities, and supporting structures dedicated to inclusion.

The Group regularly organises solidarity initiatives.

Any employee can also suggest actions to their management or to the CSR referents. All actions must be validated at Group level before being implemented.

#### What is expected of me?

- I am encouraged to take part in our solidarity initiatives.
- I have formally obtained the Group's approval for any partnership, sponsorship, event, action or project related to our solidarity commitments.

#### 4.5.2 Reducing our impact on the environment

The Group is called upon to contribute to the deployment of environmental policies, to promote the sharing of best practice and to encourage innovation in this field.

The Group is committed to integrating corporate social responsibility concerns into its actions.

The Group strives to be a responsible corporate citizen in relation to its stakeholders.

The Group is aware of the environmental impact of its business activities and is committed to limiting this as much as possible. The Group is committed to identifying and complying with all legal and regulatory obligations relating to the impact of its activities on the environment.

Through its IT services business, the Group's efforts focus in particular on the controlled recycling of IT waste (hardware and consumables). The Group also strives to optimise paper consumption. Moving to new sites is an opportunity to promote the use of energy-efficient buildings, if possible with HQE certification.

#### What is expected of me?

- I respect the environmental legislation of the country in which I operate, as well as the Group's rules in this area.
- I have obtained the Group's formal approval for any partnership, sponsorship, event, action or project related to our environmental commitments.

Done in Saint-Ouen,

20 February 2024.

