

SQLI DIGITAL EXPERIENCE

SQLI
Société anonyme [Public limited company]
Share capital: €3,691,180
Registered office: 166, rue Jules Guesde
92300 Levallois Perret
Nanterre Trade and Companies Register no. 353 861 909

INTERNAL RULES OF THE SQLI ETHICS COMMITTEE

PREAMBLE

Pursuant to Law no. 2016-1691 of 9 December 2016, known as the "Sapin II" law, the General Management of SQLI has decided to set up an Ethics Committee which will be the preferred contact point for all SQLI Group employees in order to support them in their professional activities and the fight against corruption (hereinafter the "Ethics Committee").

COMPOSITION

In order to ensure the greatest confidentiality of the facts that it may become aware of, SQLI's General Management wished to limit the number of members of the Ethics Committee.

The Ethics Committee is composed of three (3) permanent members, the Chief Executive Officer (who may be substituted by the Deputy Chief Executive Officer in charge of finance), the Group Human Resources Director and the Group Legal Director.

In the event of a conflict of interest with one of these members, an alternate may be appointed by majority vote of the other three permanent members of the Ethics Committee from among the following functions: Deputy Managing Director in charge of Finance (if he/she does not replace the Managing Director), Operations Director or International Director.

ROLE

The Ethics Committee is responsible for:

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- ensure compliance by all Group employees with the requirements of the SQLI Group Code of Conduct, which applies to all, in France, in Europe and worldwide;
- respond, as the primary contact and preferred contact person for all Group employees, to their questions regarding the interpretation and/or application of the provisions of the Group Code of Conduct;
- take up any question relating to the prevention and fight against corruption;
- propose to the Group Audit Committee and the Board of Directors revisions and/or updates to the Group Code of Conduct, whenever they prove necessary;
- receive and analyse reports of conduct or situations contrary to the law or the SQLI Group Code of Conduct that may be sent to it directly;
- collect and study alerts that may be sent to it directly via the ethics@SQLI.com email address, in accordance with the internal alert process implemented within the SQLI Group;
- decide what action to take with regard to reports and alerts that will be sent to it.

The Ethics Committee and its members undertake to exercise these powers with integrity and objectivity, if necessary with the help of external Advisors, Lawyers and/or experts, within a reasonable period of time which must be assessed on a case-by-case basis, according to the seriousness and urgency of the reported facts.

The members of the Ethics Committee will not receive any remuneration as a result of their duties.

MEETINGS & VOTING PROCEDURES

The Ethics Committee will meet:

- at least once (1) a year, for a review of the past year which will be the subject of a written report;
- at any time and as often as necessary, to know and deal with any question, report or alert that may reach it. In this case, the dates and agenda of the meetings of the Ethics Committee shall be brought to the sole attention of its permanent members.

The duration of the meetings must allow for in-depth review and discussions of the subjects that will be submitted to it and falling within its remit.

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Any decision of the Ethics Committee, whatever it may be, shall be taken by a majority of its members present.

CONFIDENTIALITY

In accordance with the provisions of the Sapin II Act, the Ethics Committee and each of its members undertake to exercise their prerogatives in a strictly confidential manner.

In this respect, its members shall refrain from disclosing to any third party, internally or externally, the meetings of the Ethics Committee and the matters dealt with on this occasion.

Any disclosure may incur their criminal liability as well as that of the SQLI Group and its managers.

CONTACT

Any question, request or report must be sent to the Ethics Committee by email at ethics@SQLI.com.