

**SQLI
DIGITAL
EXPERIENCE**

**CODE OF
CONDUCT**

SQLI CODE OF CONDUCT

PREAMBLE

The ethics of the SQLI Group are expressed through fundamental principles, which are intended to guide the working behaviours of all personnel: responsibility, integrity, respect for others, objectivity, loyalty and trust.

These principles are an extension of the Group's values, which are:

- **"Commitment"**: Being committed to all our projects. Engaging with our customers. Getting involved.
- **"A creative spirit"**: Being creative, sometimes a forerunner, always inventive, curious, open and connected to everyone.
- **"Forward thinking"**: Anticipating. Going the extra mile. Being ahead of the curve. Experience in support of boldness. Daring.

By formalising and reaffirming these principles already known and respected within the Group, the Code of Conduct is part of a broader approach and serves to strengthen them.

Our Code of Conduct expresses our respect for the law and people, as well as our responsibilities towards our customers and other Group stakeholders. It is the foundation of our ethical culture.

The performance objective cannot justify a breach of the rules indicated in this Code under any circumstances.

The Code presents the guidelines defining the expected behaviour of employees/corporate officers as well as the systems for identifying and remedying any conduct problems.

The purpose of the Code is not to provide for everything: above all, it is an essential aid to decision-making and a conduct guide for the persons concerned. However, under no circumstances does it replace or contradict the legislative, regulatory and statutory provisions that apply to the SQLI Group. Nevertheless, it is intended to be used in the absence of such binding provisions.

Each person is the guarantor of the Group's ethics and their dissemination to the Group's contacts, external partners and co-contractors (in particular suppliers, customers, intermediaries, service providers and subcontractors).

We want each employee and corporate officer of the Group and any person acting on behalf or in the name of one of the Group's companies, regardless of their position, hierarchical level or the country in which they work, to apply the professional ethics principles set out in this Code.

It is the responsibility of every employee/corporate officer to familiarise themselves with this Code and to properly understand how it applies on a daily basis with, as fundamental principles,

compliance with the laws and fundamental principles (1.), integrity (2.), in the context of relations with our partners also (3.), protecting the assets of the Group and third parties (4.) and demonstrating a spirit of citizenship (5.). The Ethics Committee (6.) and the alert handling procedure (7.) are available to everyone to ensure the proper application of the SQLI code of conduct adopted by the Group's highest bodies, in conjunction with the Employee Representative Bodies, for its entire scope and whose publication (8. And 10.), will be followed by initial and periodic training for the employees most exposed to corruption risks (9.). Compliance with the Laws and Regulations in force in the countries where the Group is present, as well as with the Group's policies, standards and principles, is the responsibility of each person, and the commitment of everyone (11.).

In case of doubt regarding the implementation of or compliance with the principles set out in this Code, each employee must refer to their direct manager or to the Ethics Committee, who/which will inform them of the action to be taken.

1. Respect for others

The Group is committed to respecting and promoting the fundamental rights arising from the United Nations Universal Declaration of Human Rights and Global Compact, the dignity and worth of the human person and the equal rights of men and women.

As SQLI strongly opposes violations of human dignity, the Group applies, inter alia, local, national, European and international laws and regulations relating to child labour and any type of forced or compulsory labour. We are also committed to respecting freedoms of association and collective bargaining.

1.1 Contractual commitments and compliance with the law

All employees must ensure that their actions are in line with the legal provisions applicable in France or abroad, under penalty of legal sanctions. Non-compliance with the regulations in force may also result in the civil and criminal liability of managers and the company, as well as that of employees, in particular in the event of acts of corruption.

1.2 Health and safety

The Group undertakes to ensure health and safety in order to preserve the health and physical and mental integrity of its employees, whether they work at its own sites or those of its customers.

Each of us must respect and comply with the laws and procedures in force. When working at a customer's premises, we must also comply with all the health and safety rules specific to the customer, as well as with their emergency procedures.

We must identify and report to the person in charge of health and safety at local level or to our manager any behaviour that may represent a danger or risk and any situation that may endanger the health or safety of our employees.

1.3 Equality, diversity and integration

Each employee is entitled to equal opportunities and fair treatment and to the recognition and promotion of their individual skills.

The Group promotes diversity and undertakes not to engage in any discrimination and to comply with all the legislative provisions that combat discrimination.

It seeks to offer equal opportunities and fair treatment regardless of social, cultural, ethnic or national origin, religious or other beliefs, caste, marital status, possible pregnancy, sexual orientation, disability, age and trade union membership.

1.4 Harassment and respect for privacy

We all have a right to respectful and courteous treatment; likewise, we all have a duty to treat others with respect and courtesy. Therefore, each employee must contribute to quality professional relationships that are open, fair and respectful of everyone.

Each employee has the right to respect for their fundamental rights, in particular relating to the dignity of the human person and protection against any form of violence, harassment or discrimination. The Group undertakes to ensure that the professional environment is free from any harassment and, in particular, from any intimidation, sexual advances, threats and acts of violence.

Each employee has the right to privacy. The Group undertakes to comply with national, European and international laws and regulations on the protection of employees' personal data.

2. Integrity

2.1 Fair competition

The Group conducts its business, innovates and develops fairly, in accordance with the principle of freedom of trade and industry and is prohibited from undermining free competition through unlawful agreements, active or passive corruption, influence peddling or favouritism.

In addition, it is prohibited to enter into an agreement or arrangement with its competitors and to address issues aimed at limiting competition or to agree on:

- The price & terms of sale applied;
- Service costs;
- Customer sharing & commercial territories;
- Sales volumes, market shares and margins.

Employees are therefore responsible for complying with these requirements as part of their professional activities. Everyone must act independently and in the interest of the company, while respecting the competition.

The Group complies with national, European and international legislation that prohibits or regulates the financing of political parties and undertakes to engage in responsible lobbying.

Our approach consists above all in enhancing our strengths and our offers.

2.2 Corruption

Corruption is an offence punishable by criminal and civil sanctions in most of the countries in which the Group operates. SQLI firmly condemns all forms of corruption (including facilitation payments), regardless of

the country in which it operates. The Group's policy is "zero tolerance": such behaviour is unacceptable.

For example, it is therefore strictly prohibited to:

- Offer, promise or give money or anything else of value (gifts, invitations, etc.) with the aim of obtaining any benefit for SQLI from:
 - A public official;
 - A political party;
 - A political player;
 - A trade union representative;
 - A trade union;
 - A charitable or similar organisation;
 - An employee or representative of another company etc.
- Accept or solicit money or anything else of value (gifts, invitations, etc.) that may lead us to breach our duty of loyalty or be perceived as influencing a business relationship.

Gifts or invitations may only be accepted on condition that they comply with the principles of the group's "Travel Expenses and Gifts Policy".

- Use intermediaries without checking their integrity and reputation and hoping that they will use all means at their disposal to successfully carry out their duties.

The Group therefore undertakes not only to combat corruption in all its forms, but also to combat influence peddling and money laundering. Tolerating corruption is unacceptable behaviour for the Group.

In addition, at their level and pursuant to the duty of loyalty, each employee is called upon to perform their duties in the interest of the Group, in particular by participating in the prevention of fraud, and to avoid any situation of conflict of interest, favouritism or insider trading.

Violating anti-corruption legislation does not only expose the Group to potentially very heavy civil and criminal sanctions, it can also expose all employees to the same civil and criminal sanctions (in particular prison sentences).

2.3 Conflicts of interest

A potential conflict of interest arises when we have contradictory interests at the same time. Therefore, when a personal interest contradicts the Group's interests, we risk breaching our duty of loyalty.

This is the case whenever the possibility of a direct or indirect personal gain influences or can influence a decision in relation to our professional activity. We must therefore avoid putting ourselves in situations where our individual interests may conflict with those of the Group.

Therefore, all employees and corporate officers must avoid:

- Any acquisition of an interest in a competitor, supplier or customer - unless expressly authorised by the competent manager;
- Establishing commercial relations in the name of SQLI with a close relative (family, friends, etc.) directly or indirectly (subsidiary company) - unless expressly authorised by the competent manager;

Each employee must ensure compliance with the principles of equal treatment and never accept or offer a gift or benefit likely to affect the impartiality of decisions.

2.4 Insider trading

Persons likely to hold inside information, i.e. information that, once made public or if it were, could be taken into account by an investor in their decisions to sell, buy or hold securities, must exercise extreme caution when considering trading in the shares of the Group, its customers, its business partners and its suppliers. Disclosing inside information or engaging in transactions using inside information is prohibited.

A breach of the aforementioned rules on refraining from dealing may constitute an insider breach or offence that is punishable by:

- a financial penalty of up to €100 million or ten times the amount of the profit made,
- a five-year prison sentence.

In order to avoid the use of inside information, SQLI requires that the most exposed employees sign an insider letter.

2.5 Sincerity and accuracy of business and financial information

The Group ensures that it develops and disseminates true and accurate commercial and financial information in a transparent manner and within the given deadlines. Documents concerning the Group must also be handled with the utmost care and to the best of the Group's knowledge.

In terms of communication, each employee must contribute to the timely transmission to the Finance Department of all information/documentation concerning them, such that the transactions recorded and communicated, in particular to the Shareholders and the public, are true and accurate.

3. Relations with our partners

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

Compliance with commitments made with partners (customers, suppliers, etc.) is also required. Each employee must always demonstrate transparency, fairness and honesty. Of course, any termination at the Group's initiative must be justified and respect the values & principles set out in said Code.

3.1 Customer relations

We work closely with our customers to create value by mobilising our know-how and soft skills and, at the

same time, to guarantee sustainable and profitable growth for the Group.

The Group is committed to working honestly and fairly with all its customers, providing them with high-quality products and services.

The Group expects its customers to behave in line with its expectations from both a legal and ethical point of view.

3.2 Collaboration with suppliers

The Group undertakes to treat its suppliers and subcontractors fairly.

The Group expects its suppliers to treat it fairly and ethically.

Employees must demonstrate loyalty, fairness and transparency in their relations with suppliers.

Supplier selection must be based on principles of fair competition and the quality of the services offered.

Supplier performance must be assessed according to the purchasing procedures in force and, failing that, based not only on the quality of the services but also on its competitiveness, financial stability, integrity and ability to adhere to the Group's values.

The Group demands a moral and ethical commitment from its suppliers, and compliance with the applicable anti-corruption law.

The SQLI 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 Ethics and Social and Environmental Responsibility.

4. Group and third-party assets

4.1 Confidential information

The confidential information of the Group, its staff, its customers, business partners and suppliers must be protected.

Some of our customers' sensitive information requires special protective measures, so the employment contract, signed with each employee, includes a paragraph informing them of the rules relating to professional secrecy.

The mission order reiterates these rules in an annex on the protection of our customers' information, signed by our employees. In the case of flat-rate services, the quality assurance plan specifies the rules to be applied, regardless of the place of performance of the service, in a security and confidentiality chapter.

4.2 Protection of personal data

The Group is responsible for the protection of personal data. It carefully processes personal data and restricts its collection and access to protect individuals' privacy.

The Group ensures that personal data is stored in a secure place and remains confidential.

The Group undertakes not to market or disclose personal data without authorisation.

5. Environmental responsibility

The Group is called upon to contribute to the deployment of environmental policies, to encourage the sharing of good practices and to encourage innovation in this area.

The Group also undertakes to integrate corporate social responsibility concerns into its actions.

The Group strives to be a responsible corporate citizen with regard to its stakeholders.

The Group is aware of the impact that companies' activities have on the environment and undertakes to seek to limit this as much as possible. The Group undertakes to identify and comply with all legal or regulatory obligations relating to the impact of its activities on the environment.

Through its IT activity, the Group's efforts focus primarily on the controlled recycling of computer waste (hardware and consumables). The Group also monitors the optimisation of paper consumption and takes steps to extend this optimisation to electricity consumption at the highest-consuming sites (hardware housing). New site installations are an opportunity to encourage introduction in energy-efficient buildings, if possible HQE-certified.

6. Ethics Committee

The Ethics Committee is responsible for ensuring compliance with the requirements of the Code and for monitoring the good example shown by employees. To this end, it may propose revisions and updates to the Code, whenever they prove necessary, to the Audit Committee and the Board of Directors.

It is also the point of contact for employees for any question on the interpretation of the provisions of the Code or related to its application, but also for any report of conduct that is contrary to the rules laid down by this Code.

The Ethics Committee is composed of three (3) permanent members, the Chief Executive Officer (who may be replaced by the Deputy Managing Director 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 (provided this alternate member is not replacing the Chief Executive Officer), Operations Director or International Director.

7. Alert handling procedure

Should they become aware of unethical behaviour contrary to the applicable regulations on human rights, fundamental freedoms, health, safety, the environment, corruption and unfair competition, corporate officers and employees are encouraged to immediately report them to the Ethics Committee (group ethics representative) using the following dedicated address: ethics@SQLI.com.

When reporting, the person making the report ("whistleblower") must characterise the facts that they have observed directly and provide all the evidence in their possession (documents, photos, etc.) in order to support their report.

The Ethics Committee will acknowledge receipt of the alerts thus received, at the latest, within eight (8) working days from their receipt at the dedicated email address and will communicate an estimate of the time required to examine their admissibility.

The Ethics Committee will be responsible for organising contacts and exchanges with the whistleblower when examining the alert and the follow-up actions.

SQLI undertakes to take all appropriate measures so that the whistleblower cannot be subjected to any pressure or reprisals, due to their actions, in particular by guaranteeing the confidentiality of the identity of the whistleblower and of the person(s) concerned by the alert, including in the event of communication to third parties, insofar as this is necessary for the purposes of processing the alert.

Nevertheless, any malicious or improper report or any report made in bad faith report will result in disciplinary or even legal sanctions.

Once the admissibility of the report has been established, and any protective measures taken, the Ethics Committee will immediately inform the person(s) concerned by the report and, if the latter agrees, their

manager.

All information relating to the identity of the whistleblower and the person(s) concerned in the cases deemed inadmissible will be immediately destroyed by the Ethics Committee.

The information provided in the context of a report is strictly confidential, in particular that which may identify the person making the report. It may only be disclosed with the agreement of this person. The initiation of legal proceedings may also justify the lifting of confidentiality.

Alerts are subject to internal investigations. Findings referring to proven breaches may justify/trigger professional sanctions, the nature and extent of which are defined by the internal regulations of the company to which the employee in question belongs.

For alerts that have been investigated, information relating to the identity of the whistleblower and the person(s) referred to in the files will be destroyed within two months of the closure of the file by the Ethics Committee.

This procedure will be the subject of an automated processing declaration to the French Data Protection Authority.

8. Communication and modification

This Code of Conduct is published on the SQLI institutional site "www.SQLI.com" and on the Group intranet (ONESQLI).

This Code may also be modified to take new legislation into account.

9. Training

Each Group employee is invited to read this Code and apply its rules.

Similarly, employees most exposed to the risks of corruption will be required to undergo initial and periodic training.

A copy of this Code of Conduct will be provided by the Human Resources of each subsidiary to all new employees as soon as they join the Group.

10. Adoption and dissemination

This Code of Conduct has been submitted to the Employee Representative Bodies, the Audit Committee and the Board of Directors of SQLI. It is an integral part of the Internal Regulations of the company to which the

employee in question belongs and is appended thereto.

The French version of the Code is the reference; it will be translated into one or more languages of the countries in which the Group operates.

11. Compliance with the Code

Compliance with the rules laid down by the Code of Conduct, approved by the Audit Committee and the Board of Directors, is imperative, and no one within the Group can ignore them.

Non-compliance with one of these rules by one or more employees may constitute misconduct and be subject to disciplinary sanctions and appropriate proceedings. Disciplinary sanctions, in accordance with the applicable law and/or the internal regulations in force, may include dismissal for misconduct.