

sqli

Code of Conduct

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Preamble



Erwan Le Duff, CEO SQLI

"At SQLI, we believe that success depends above all on the shared values that underpin our day-to-day activities.

As a responsible and visionary company, we must ensure a framework that reflects both our ambitions and our ethics. It is in this spirit that this Code of Conduct has been drawn up, not only as a compass guiding our actions, but also as a formal commitment to adopt a threshold of requirements in terms of professional behavior.

The purpose of this Code is to disseminate these values in every aspect of our business, both internally and externally, to all those who interact with us: employees, customers, suppliers, service providers and subcontractors. This document is not only a guide to ensure compliance with our rules, it also reflects our desire to create an environment where mutual respect, creativity and forward thinking flourish freely.

We therefore invite everyone to make these principles their own, and to participate in the collective effort to maintain an exemplary working environment. By working together, we ensure that SQLI continues to shine through its commitment, its capacity for innovation and its forward-thinking vision.

This Code is not exhaustive and may not cover all situations likely to be encountered. In such cases, we recommend that you seek advice or approval from a higher authority. The rules may also evolve to take account of any regulatory or legislative changes.

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I. Scope of application

This Code of Conduct applies to the entire SQLI Group. It constitutes a common base for all companies controlled by SQLI SAS.

Each subsidiary has the option of supplementing this Code of Conduct with an appropriate appendix to reflect the specific nature of its activities and locally applicable regulations.

At the level of each SQLI Group subsidiary, compliance with SQLI Group commitments is ensured by applying SQLI Group procedures, policies and tools and/or by implementing equivalent procedures, policies and tools adapted to local activities and context, where applicable.

This version represents the version adopted by SQLI Deutschland.

SQLI also undertakes to promote the principles set out in this Code of Conduct in its relations with all third parties.

II. Respect for fundamental rights, laws and regulations

SQLI operates in many countries and complies with the laws and regulations in force in the countries where the SQLI Group is present.

As a responsible stakeholder, we ensure that all our actions, whether in our internal operations or in our relations with external partners, comply with the applicable legal frameworks.

II.1 Respect for Fundamental rights

Fundamental rights are of particular importance to our company, given their universality and their contribution to everyone. For this reason, we are committed to respecting texts relating to fundamental rights, such as the European Convention for the Protection of Human Rights and Fundamental Freedoms, and the Universal Declaration of Human Rights.

II.2 Compliance with international labor commitments

The company is committed to respecting international labor standards as defined by the International Labor Organization (ILO). This includes, but is not limited to:

- **Elimination of forced and compulsory labor:** We ensure that all employees work voluntarily and are free to leave their jobs in accordance with local laws.

- **Abolition of child labor:** We strictly prohibit child labor and comply with local and international laws concerning minimum age of employment.
- **Eliminating discrimination in employment and occupation:** We promote equal opportunity and treat all employees fairly, regardless of race, gender, religion, national origin, sexual orientation, age, disability or any other characteristic protected by law.

We pass on these requirements to our partners and subcontractors.

III. Fighting corruption and influence peddling

We are firmly committed to fighting all forms of corruption and influence peddling. By adopting a zero-tolerance policy, we aim to maintain an ethical working environment and preserve the trust of our partners and customers.

III.1 Definitions

What is a corrupt act?

It is an offence of **active corruption** to offer a gift or invitation to:

- a public official to perform or refrain from performing an act related to his function, mission or mandate or facilitated by his function, mission or mandate (active bribery of a public official, national or foreign);
- a person exercising a private function to perform or refrain from performing an act of their activity or function in breach of their legal, contractual or professional obligations (so-called private active corruption).

The acceptance or solicitation of such gifts and invitations, for oneself or for others, by a public official or by a person exercising a private function, with the same purpose, constitutes an offence of **passive corruption**.

In addition, **active influence peddling** is defined as the offer of such gifts and invitations to a public official, for himself or for others, to abuse his real or supposed influence with a view to obtaining distinctions, employment, contracts or any other favorable decision from a public authority or administration. The acceptance or solicitation of such gifts and invitations by a public official for the same purpose constitutes **passive influence peddling**.

III.2 Non-exhaustive examples of prohibited acts

- **Undue advantage to obtain the award of a contract:** a SQLI sales representative offers a holiday to the CIO of a client company to ensure that he is selected for the award of a project.
- **Awarding of a public contract in return for the recruitment of a close relative:** the purchasing manager of a local authority proposes to encourage the award of a public contract to SQLI if his nephew is hired.

- **Secret commission:** a purchasing manager from SQLI obtained a secret commission from a partner in exchange for signing a contract by overstating the cost of services.
- **Data manipulation:** a SQLI system administrator agrees to transfer to a third-party company the data of a customer in competition with this third-party company, in return for a sum of money.
- **Bribes to favor a supplier:** a SQLI purchasing manager accepts gifts or money from a supplier to favor it over other competitors offering more advantageous commercial terms, thus going against the company's interests.
- **Gifts offered to spouse:** a service provider offers my spouse a luxury watch in exchange for a commercial advantage from SQLI.

III.3 How to prevent corruption and influence peddling

The purpose of this Code of Conduct is twofold:

- To provide everyone with clear principles and rules, constituting effective benchmarks in the conduct of all SQLI Group activities, so that they have a good knowledge and understanding of what is at stake for the SQLI Group and know how to react,
- Empower employees and make compliance part of the corporate culture.

SQLI rejects all forms of active or passive, direct or indirect corruption, as well as influence peddling.

What to do:

- **Participate in regular training sessions** on anti-corruption and influence peddling and keep abreast of the company's ethics and compliance policies and procedures.
- **Identify and assess the situation** to recognize signs of corruption or influence peddling, such as requests for favors, offers of gifts or suspicious behavior.
- **Document the facts:** Record the details of the incident, including the names of the people involved, dates, locations and the nature of the exchanges. This documentation can be crucial to any subsequent investigation.
- **Report the incident:** Immediately inform your line manager or the compliance department of the company concerned, and SQLI's compliance department if it is involved. Use the internal reporting channels in place, such as online reporting forms: [LEGAL](#) - [external](#).
- **Cooperate with those in charge of any investigations:** Provide all necessary information and documentation to internal or external investigators. Cooperate fully to ensure rapid and effective resolution of the incident.

What not to do:

- **Never propose, offer or promise, directly or indirectly, solicitations that fall within the scope of prohibited behavior:** bribes, gifts, commissions or undue advantages.
- **Never yield to a solicitation from someone offering to use their influence to obtain a contract or any other favorable decision.**
- **Never grant an advantage of any kind to a public official who requests it to carry out an administrative formality incumbent on the public official.**

- **Never incite or be an accomplice to attempts or acts of corruption.**

By adopting these behaviors, every employee and every outsider contributes to maintaining an honest working environment and protecting SQLI's ethics.

III.4 Relations with third parties

The development of the SQLI Group, and its credibility, are founded on its professionalism, its sense of responsibility and its constant search for the best performance.

It is therefore imperative that our business transactions with third parties are based on respect for applicable law, comply with the principles of independence and objectivity, and are conducted transparently and in the context of fair competition.

We expect our third parties, whether consultants, service providers, subcontractors, suppliers, partners, etc., to work with integrity and in compliance with applicable laws and regulations. It is also essential that our third parties share and apply the principles and rules of the SQLI Group set out in this Code of Conduct.

- To ensure sound and fair business relations with our third parties, it is necessary to:
 - Select our third parties according to objective criteria (quality, price, compliance with deadlines, RGPD and CSR commitments, etc.) and after a competitive bidding process,
 - Conclude contracts adapted to the commercial relationship,

Remuneration for products and services actually delivered within the contractual framework.

What to do:

SQLI Group employees involved in purchasing must:

- Follow a competitive selection process for any business relationship with a third party,
- Follow the internal procedure specific to subcontracting in Germany
- Ensure that the services to be provided are described in a written agreement specifying their nature and conditions of performance,
- Ensure that a balanced remuneration is defined, and that payments are made after checking that the services have been carried out correctly, both in terms of completeness and quality, on presentation of invoices and all supporting documents.

What not to do:

- Engage with a third party who refuses to make a clear anti-corruption commitment,
- Or whose past activities, reputation or references create legitimate suspicion of questionable or unethical business practices,
- Or who wishes to remain anonymous in transactions,

- Or who refuses a clear contractualization of the services to be provided and the corresponding balanced remuneration.

IV. Other situations that must be guided by probity

The situations described in this section are likely to undermine SQLI's ethics and values. It is important for anyone who encounters them to be able to identify them and adopt the right behaviors, following the example of the anti-corruption guidelines above.

IV.1 Conflicts of interest

Conflicts of interest arise when an employee's personal interests interfere, or appear to interfere, with the company's interests. To ensure integrity and transparency, it is crucial to recognize and manage such situations proactively.

Transparency is fundamental, and exemplarity in the eyes of your employees and colleagues is essential.

Illustration: for example, favoring a supplier or a candidate for a position based on friendship rather than the company's objective interests.

How to behave :

- **Declare immediately:** Inform your line manager or Group Legal Department as soon as you become aware of a potential conflict of interest. Transparency is the best protection against any appearance of bias.
- **Avoid making decisions:** If you are in a conflict-of-interest situation, refrain from participating in any decision or action that could be influenced by this conflict.
- **Use a neutral third party:** Ask an impartial person, such as your line manager, to make the important decisions or assess the situation, to guarantee objective results.
- **Document the situation:** Keep a written record of the circumstances and actions taken to manage the conflict of interest, to demonstrate your commitment to compliance and ethics.
- **Follow internal policies:** Comply strictly with SQLI's guidelines and procedures for managing conflicts of interest.

IV.2 Gifts and invitations

To control the gifts and invitations it issues or receives, SQLI has set up a dedicated policy to which all members of the company must strictly adhere.

It applies both to gifts and invitations made by SQLI employees or service providers to external persons, whatever their capacity, and to gifts and invitations sent by external persons to SQLI Group employees. The main principles of the Gift and Invitation Policy are as follows:

- Certain gifts are strictly forbidden

- Gifts and invitations over a certain amount must be authorized in advance by the member of the Executive Committee to whom you report.
- Gifts and invitations must be declared

Find out more: [LEGAL - Home](#)

IV.3 Money laundering

Money laundering consists of concealing the illicit origin of funds obtained through criminal activities, by reintroducing them into the legal economic circuit. Not only is this practice illegal, it also undermines the integrity of the financial and economic system. It enables criminals and delinquents to profit from their illegal gains and finance other illicit activities.

Illustration: a company employee receives funds from criminal activities and deposits them in a company bank account, passing them off as payments from fictitious customers. In so doing, he attempts to make the funds appear legitimate.

What to do if you suspect money laundering:

- **Report immediately:** Inform your line manager of your suspicions without delay or use the Internal Alert System. It is crucial that internal authorities are alerted to take appropriate action.
- **Don't take solitary action:** Avoid trying to solve the problem yourself.
- **Gather evidence:** Keep all relevant evidence that could support your suspicions. This includes financial documents, communications and any other useful information.
- **Maintain discretion:** Exercise discretion and confidentiality throughout the process to avoid compromising the investigation and to protect your personal safety.
- **Follow instructions:** Carefully follow the instructions provided by your Ethics Officers or the relevant authorities. They will know how to handle the situation appropriately.

IV.4 Compliance with competition regulations

Compliance with competition law is essential to ensure a fair and dynamic market. Companies must act independently and avoid any illegal agreements with their competitors. SQLI has a duty to set an example. It must, in all circumstances, make its business decisions autonomously, without seeking to coordinate with competitors to fix prices, allocate markets, business sectors or customers, or collude to fix market shares. It must also maintain total transparency in all its business transactions and decisions.

Trade shows and other professional gatherings are sensitive places that can put SQLI at risk and require great vigilance in any exchanges that may take place there.

The right behaviors to adopt are as follows:

- Never discuss past invitations to tender, even when SQLI has not been selected, current or future invitations to tender in which SQLI has participated or intends to participate;

- Avoid sensitive discussions: do not discuss prices, tenders, customers or prospects, SQLI offers or other sales terms with competitors, as this could be interpreted as collusion.
- Document justifications for major decisions and exchanges or interactions with competitors: context, subjects raised, etc.
- Consult your legal department if you have any doubts about what practices to adopt, or if you need any advice.

IV.5 Patronage and sponsorship

Patronage and sponsorship enable companies to support educational, scientific, social, social, social, humanitarian, sporting or cultural causes through financial backing. SQLI regularly carries out operations of this nature to support causes that reflect its values and are beneficial to society. To determine which operations may be supported, SQLI ensures that they always pursue an objective in line with its values and in such a way as not to contravene its commitments in terms of probity and the fight against corruption.

Illustration: a company decides to sponsor a local sporting event that is part of a public body to which the company is responding to a call for tenders. If the choice of beneficiary is influenced by personal relationships or undue advantages (such as winning the tender), the operation is prohibited.

To carry out sponsorship activities without risk, it is essential to adopt several key behaviors:

- **Transparency:** Make sure that all the information about your project is clear and accessible. Communicate openly about objectives, beneficiaries and amounts involved.
- **Evaluation of beneficiaries:** Choose beneficiaries with a good reputation and objectives compatible with the company's values. Avoid potential conflicts of interest and verify the integrity of partners.
- **Prior approval:** Any sponsorship or patronage operation must be approved in advance by the member of the Executive Committee to whom you report, as well as by your entity's Finance and Administration Department. The operation must then be submitted to the Group Legal Department so that the appropriate contractual documentation can be drawn up.
- **Regulatory compliance:** Ensure that operations comply with applicable laws and regulations, particularly in terms of anti-corruption and probity.
- **Monitoring and evaluation:** Set up monitoring mechanisms to assess the impact of sponsorship initiatives. Ensure that funds are used in accordance with the stated objectives.

Contributions to political parties, foundations or associations are strictly forbidden.

Likewise, it is forbidden to engage in any action if you are aware of an actual or potential conflict of interest.

By adopting these behaviors, SQLI can continue to support educational, scientific, social, humanitarian, sporting or cultural causes while minimizing risks and remaining true to its values and ethical commitments.

V. Respect for the individual within the company and behavior at work

The respect and well-being of individuals is at the heart of our corporate culture. We are committed to creating an inclusive working environment, where every employee feels valued and respected. We have adopted principles of equal opportunity and non-discrimination, as well as measures to prevent and punish acts of harassment. Our aim is to provide a safe and healthy working environment for all.

V.1 Principles of equal opportunity and non-discrimination

The company is committed to promoting equal opportunities and preventing all forms of discrimination. All employees must be treated equally, regardless of gender, age, ethnic origin, religion, sexual orientation, disability or any other characteristic protected by law.

V.2 Measures to prevent and punish harassment

To guarantee a healthy and respectful working environment, SQLI has appointed referents for sexual harassment and sexist harassment in the workplace.

Furthermore, SQLI reminds you that the victim or witness of such acts may not be subject to any disciplinary sanction or reprisal whatsoever for having made a report in good faith (even if the facts reported are not ultimately established).

Members of management are personally responsible for upholding these principles.

All employees are made aware of these rules, which are posted on our sites and included in our internal regulations.

Anyone who believes they have been the victim of, or witnessed, such incidents is encouraged to report them promptly to the designated contact persons, to a manager, to the HR team or via the alert system.

VI. Health, hygiene and safety at work

We are committed to ensuring the health, hygiene and safety of our employees in their working conditions, both on our own sites and those of our customers.

In this respect, SQLI complies with all applicable laws, policies and regulations relating to health and safety in the workplace. We encourage our members to report any working conditions that contravene applicable procedures or are generally unsafe, to raise awareness of the importance of safety in the workplace.

Any breach of safety rules will result in appropriate and proportionate punishment of the person concerned, in accordance with the company's internal regulations.

VII. IT security

Given the nature of our business, IT security is a crucial strategic aspect for our company and a major issue for our customers.

To this end, SQLI deploys security measures tailored to the projects we carry out, using appropriate techniques and skilled personnel to implement and maintain them.

Our employees are also regularly briefed on cybersecurity issues and best practices.

VIII. Personal data protection and confidentiality

SQLI attaches the utmost importance to the protection of personal data and the confidentiality of the information entrusted to it.

VIII.1 Protection of personal data

Personal data protection refers to all measures taken to guarantee the confidentiality, integrity and security of information relating to identified or identifiable individuals.

In doing so, SQLI firmly applies to the laws and regulations applicable in the countries in which it processes data on behalf of itself, its customers, or any other person.

We have set up a personal data protection compliance program and confidentiality policies and regularly raise awareness of this issue among all our employees, so as to develop a culture of data protection and the issues involved.

To find out more about our privacy policies and personal data protection compliance program:

- For SQLI employees: [SQLI PRIVACY - Home](#)
- For external users: [Privacy Center](#)

VIII.2 Privacy

Confidentiality of information is essential to maintain the trust of our customers, partners and employees. We therefore implement measures to guarantee the security and confidentiality of such information (whenever it is identified as confidential), in accordance with our contractual commitments and current laws and regulations, particularly those relating to business secrets.

Our employees and subcontractors are made aware of the importance of confidentiality and are subject to the same obligations in this area as we are.

In the event of a breach of confidentiality or suspected breach of confidentiality, it is crucial to adopt the following behaviors immediately:

- Inform immediately: Report the violation to your line manager and/or the Group Legal Department (legal@sqli.com) as well as to the company's Data Protection Officer (privacy@sqli.com).
- Document the breach: Record all relevant details of the incident, including dates, times, people involved, and the nature of the information compromised.

To find out more: [Confidentiality obligation: what are our commitments?](#)

IX. Intellectual property

Intellectual property protects SQLI's intangible assets, logos, content, copyrights and business and trade secrets.

SQLI's employees and partners are responsible for protecting this intellectual property, while taking care not to infringe on that of its customers, suppliers or subcontractors.

Any infringement of these intellectual property rights, in particular by reproduction, representation, distribution, sale or transmission, in whole or in part, of elements protected by intellectual property rights is strictly prohibited and may result in the civil and/or criminal liability of the infringer.

X. Social and Environmental Responsibility (CSR) commitments

As a digital player, we believe that SQLI has an important role to play in creating a sustainable and fairer digital world.

As part of this global approach, SQLI has set up a CSR Policy that encourages everyone to take responsibility for acting positively from a social and environmental point of view.

SQLI complies strictly with all applicable regulations (including the CSRD), and each of our members is encouraged to adopt the best practices necessary to control the environmental footprint of their activities.

SQLI's actions in this area are regularly assessed by independent rating organizations (e.g. ECOVADIS; ETHIFINANCE).

To find out more about the SQLI Group's CSR Policy:

- For SQLI employees: [ESG SharePoint - Organisation](#)
- For external clients: [CSR approach and policy of SQLI, digital expert](#)

XI. Procedure for alerts processing

SQLI has implemented a procedure for alerts processing, which enables any crime, misdemeanor, violation of laws or regulations, breach of SQLI's Code of Conduct, or serious violation of human rights, health, safety or the environment to be reported.

The system guarantees the strict confidentiality of the identity of whistle-blowers, the persons targeted, and the information gathered, ensuring that only those persons required to process the alert will have access to it.

You can report by :

1. **Secure email:** Send an email to ethics.de@sqli.com, a secure mailbox accessible only to Ethics Officers, guaranteeing confidentiality of exchanges.
2. **Direct email:** Send an email to one of the Ethics Officers if the other is involved, using the Officer's business address with the words "Strictly Personal and Confidential - Internal Alert".
3. **Postal mail:** Send a letter to SQLI - Ethics Officers, Phönixseestr. 20 in 44263 Dortmund, Deutschland or 2-10 rue Thierry Le Luron, 92300 Levallois-Perret, France, mentioning "Strictly Personal and Confidential - Internal Alert" on the envelope.

Find out more about the Internal Alert System [here](#).

XII. Binding force of the Code of Conduct

The Code of Conduct has been submitted to the employee representative bodies and forms an integral part of the internal regulations to which it is appended. Any amendment to the present Code will also be submitted to these bodies.

Compliance with the Code of Conduct is therefore imperative, and no one within SQLI may disregard it.

Failure to comply with these rules may constitute misconduct and be subject to disciplinary action in accordance with the internal regulations, or to appropriate legal proceedings depending on the person's status.

XIII. Distribution of the Code of Conduct

This Code of Conduct replaces the one previously adopted by the SQLI UES.

The Code of Conduct is communicated to all employees before they are hired, in the same way as the internal regulations, which contain the penalties for non-compliance. The Code is then posted on SQLI sites and accessible via the intranet.

It is also accessible to anyone from the SQLI website <https://www.sqli.com/>. If the Code is modified, the updated version will be communicated in the same way.



Contacts : legal@sqli.com

DETCHEVERRY Renaud

Managing Director - SQLI International

Signed by:

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