

Forward 

Ethics Charter

SEPTEMBER 2023

A message from the Supervisory Board

Forward Global, an international group headquartered in Paris, provides services and technology for general management through a range of activities designed to protect and support the development strategy of the public and private organisations it works for.

The company's strong organic growth, driven by innovation and multiple acquisitions, has resulted in an increase in the number of its employees, turnover and site locations. The company now employs more than 300 people based in Paris, Washington, Brussels, London, Geneva, Abidjan, Saint-Louis, Singapore, Tunis, Lyon, Toulouse and La Roche-sur-Yon, as well as others working remotely on a long-term, regular or occasional basis. Our teams are made up of engineers, consultants and analysts working in a wide range of sectors including cybersecurity, public relations, international affairs, investigations and compliance.

As our young company gradually took shape, we felt the need to formalise certain key ethical principles in our internal procedures. Therefore, even though the various professions present within the Group do not necessarily face the same issues and risks, our common goals are driven by a set of common values, identified in this Charter, which forms part of our professional identity, and must be reflected in each individual's behaviour.

All Forward Global Group employees and partners therefore commit to adopting and upholding the principles set out in the latest version of the present Ethics Charter from the date of its entry into force. This Charter is a reference document that must guide the behaviour of each individual on a daily basis (employees, students on work-study programmes, interns, temporary workers, self-employed workers, consultants, subcontractors, business providers, clients, etc.).

Other tools, such as the Code of Ethical Conduct, are intended to serve as a guide for the proper implementation of the principles of this Charter.

We would like to thank all those who, through their individual efforts, help to make Forward Global a responsible, ethical and committed Group.



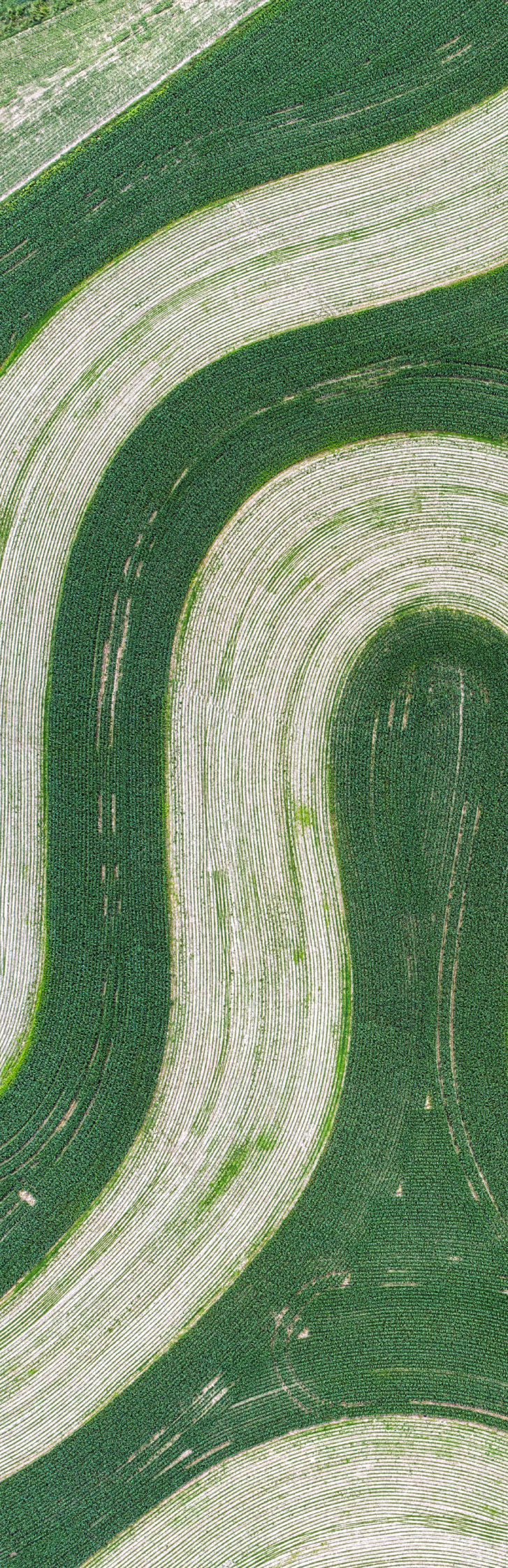


Commitment to our mission statement

Forward Global is a company whose mission is to produce a positive and significant social, societal and environmental impact in the performance of its activities.

By virtue of its mission statement, adopted within its articles of association in 2022, the Group aims to encourage strategic thinking, strengthen trust between economic stakeholders and civil society, strengthen the integrity of the rule of law, and, more generally, protect institutions, citizens and public and private organisations and their clients by helping them grow in a virtuous, sustainable manner, facilitating harmonious communication and interactions with their ecosystems, and managing the risks and crises to which they are exposed.

As part of this approach, the directors and all of Forward Global' decision-making bodies undertake to consider the social, societal and environmental consequences of their decisions on all the Group's stakeholders, as well as the consequences of their decisions on the environment.



Commitment to major legal and ethical principles

The Group's legitimacy is dependent on its capacity for innovation, creativity, technical expertise, agility, flexible and responsive organisation and the protection of individual initiatives as part of our responsibility toward one another. This can only be achieved by incorporating our entrepreneurial approach within a legal and ethical framework.

Consequently, the Group undertakes to respect and promote human rights and fundamental freedoms, to exercise vigilance in its identification of potential direct or indirect negative impacts that its activities may have on society, whether they be legal, social or environmental, in order to prevent them and, where appropriate, remedy them.

Considering the complex environment in which it works, Forward Global undertakes to conduct its activities with integrity and contribute to the economy of the countries in which the Group is established, by committing to comply with the applicable laws and regulations and to fulfil its social and tax obligations.

The Group also seeks to conduct its activities in an exemplary manner. This includes fighting all forms of bribery, preventing and managing conflicts of interest, adopting a reasonable approach to gifts and invitations, protecting confidentiality, complying with principles of fair competition, countering money laundering, complying with trade restrictions and international sanctions programmes and acting in an ethical and manner in the public sphere.

Commitment to our employees

The Group is committed to maintaining and promoting responsible and fair relations with its partners, in particular by complying with best social, environmental and societal practices.

The Group seeks to provide its employees with a fulfilling work environment by eliminating all forms of discrimination with respect to employment and occupation and all forms of forced and compulsory labour, by eradicating child labour and by recognising its employees' rights to freedom of association in order to bargain collectively. The Group, its leaders and partners must ensure the safety and dignity of all individuals on a daily basis.

The Group respects privacy and seeks to ensure a balance between work and family life through its actions and organisation.

Commitment to the best interests of the French nation

In accordance with its statutory provisions, regardless of the assignments entrusted to it and business area concerned, the Group undertakes, in all circumstances and in all places, to uphold the best interests of the French nation, where it is headquartered, ahead of the interests of any other country.

Similarly, in the event of a request for access to information by a foreign authority, the Group will comply, in all circumstances, with the provisions of French Law No. 68-678 of 26 July 1968 on communicating documents or information of an economic, commercial, industrial, financial or technical nature to foreign individuals or entities, known as the "Blocking Statute" (Loi de Blocage).





Commitment to the protection of personal data

As part of its activities, Forward Global Group and its employees may collect, process and use sensitive data including personal information, whether it be that of its employees, partners, clients or other third parties. The Group will ensure the privacy and confidentiality of this data, in particular by complying with EU Data Protection Regulation 2016/679 of 27 April 2016, as well as mandatory local precautions pertaining to the processing and use of personal data.

In any case, beyond its legal obligations, Forward Global undertakes to collect and use data in a legal, fair, legitimate and ethical manner, and to always respect the privacy of its employees and third parties with whom the Group enters into contact.

Commitment to confidentiality and transparency rules

All employees and subcontractors must undertake, at all times, to consider any information they have accessed as being covered by the obligation of professional secrecy, which is their minimum contractual obligation. In other words, they must not allude to, discuss, exchange or mention any of the information to which they have access in the context of their assignment, except where required by law (e.g., to avoid the commission and/or repetition of an offence or crime), when strictly necessary for technical reasons, or if the client expressly requests or authorises them to do so.

In accordance with applicable laws, the Group undertakes to disclose the list of its clients, if requested by the police, judicial authority or any other national regulatory authority that might request it, including in the context of an investigation, unless such disclosure would be injurious to national interests or would be legally questionable. Regarding content relating to the assignments it carries out on behalf of its clients, the Group undertakes to process each request for disclosure of information on a case-by-case basis, by observing, in this order, first the law and regulations in force locally, and then its duty of confidentiality to its clients, except where the latter can legally prevail over any legal injunction.

Similarly, the Group undertakes, in the event of an international investigation, to strictly comply with all legal provisions relating to the communication of documents and information of an economic, business, industrial, financial or technical nature to foreign natural or legal persons.

Finally, the Group undertakes to comply with the applicable professional transparency obligations in each jurisdiction where it plays the role of a public representative, such as Washington, Paris and Brussels, in particular with regard to filing representation of interests statements with the local registers of the relevant regulatory authorities.

Commitment to the interests of institutions and public life

The Group is aware of its responsibility in all the countries where it operates. Its public relations activities are therefore founded on the values defined in its Ethics Charter.

Forward Global specifically undertakes to oppose and combat all forms of bribery, whether public or private, active or passive, direct or indirect. Forward Global is committed to promoting best practices in transparency and the prevention of bribery within its sphere of activity. The Group refuses to take part in the operations and funding of political entities in the countries where it works.

The Group will inform public officials and authorities, directly or through professional organisations and associations, of its position on matters of general interest relating to its activities. It will provide public officials and authorities in its fields of competence with appropriate expertise based on reliable information.

Commitment to clients

Forward Global works with thousands of clients. Despite their diversity, each client must be treated uniquely and on an equal footing, by providing all clients with the same level of care, precautions and respect. One of the Group's strategic objectives is to safeguard and protect their interests in a way that complies with the principles of this Charter. This also means not having them take any additional risks, at least not without first obtaining their consent, which must be provided in full knowledge of the facts.

The Group's Employees declare that they will only accept assignments that they have the means (and degrees where applicable), experience, training and skills required to carry out in a way that complies with professional good practice and standards. They agree to accept assistance, if necessary, from partners who meet requirements established in this Charter.

The Group undertakes to only communicate information to clients which is freely accessible by legal means. To be considered reliable, the information and data shared must be verified and cross-checked beforehand.

Commitment to the free market

The Group respects the principle of free competition. Its employees refrain from harming or damaging the image of its competitors and strive to defend and honour the image of their profession.



Commitment to compliance with the Ethics Charter in the Group's operations

Forward Global has implemented a governance system to ensure that its values are respected and that they are upheld amid changing legal constraints and societal aspirations.

By-laws

This Charter is incorporated into the by-laws for Forward Global.

Ethics Committee

An independent Ethics Committee, governed by its by-laws of 2 November 2022, has been given the role of monitoring all Group activities, ensuring the ethical compliance of its operations when they are submitted to it, advising management and shareholders, and ensuring that the Group's fundamental interests are respected. The Group's Ethics Charter is therefore intended to inform the reference documents made available.

Code of Ethical Conduct

In addition to the Charter, the Group has adopted a Code of Ethical Conduct, which applies to all employees. As a reminder, any breach or violation of one or more of the provisions of the Code of Ethical Conduct may be subject to the application of disciplinary sanctions, without prejudice, where applicable, to the initiation of legal, civil and/or criminal proceedings. The Code of Ethical Conduct will therefore be included in the Group's by-laws, after informing and consulting with the employee representative bodies at all the Group's companies.

This Code, which is intended to be a practical guide for those to whom it applies, aims to help them abide to the best of their ability by the Group's values as set out in its Charter. It is also intended for subcontractors, for whom it shall become contractually binding, failing which the contractual relationship will be terminated, with or without prior notice and compensation, depending on the seriousness of the breach in question. Therefore, compliance with the Ethics Charter must be systematically referred to in the procurement procedures for Forward Global Group.

Internal whistle-blowing system

Forward Global promotes a culture of trust founded on ethics, integrity and compliance, and encourages employees to share their doubts and concerns about situations or behaviours that violate its Ethics Charter or Code of Ethical Conduct. It is important to be able to communicate openly, raise questions and concerns and report any potential violations to protect the Group and the interests of its stakeholders. No penalties or discriminatory measure will be taken against employees who make such reports in good faith, even if the facts reported prove to be inaccurate or do not give rise to any action.

Employees may report the issue internally to their line manager or to the relevant contact person by any means of communication (letter, email, telephone, in person).

If for whatever reason this option is not feasible, the Group has established a professional whistle-blowing system that is open to all employees and external third parties in order to create a safe setting for reporting concerns. All the interactions and information recorded on the platform chosen by Forward Global, and provided by an external entity, are encrypted and can only be viewed by authorised users. This whistle-blowing platform allows reports to be filed in different languages, 24 hours a day seven days a week and in conditions that ensure the utmost confidentiality and strength of data protection.

The use of this system is governed by a Report Collection and Processing procedure, which provides potential users with the rules they must follow in order to lawfully file a report. It also allows them to benefit from the legal status that protects whistle-blowers, as introduced by French law no. 2016-1691 of 9 December 2016, referred to as Sapin II Law (Loi Sapin II) on transparency, anti-bribery and the modernisation of economic life. The purpose of this procedure is to define the intention of the report in practical terms, the characteristics a whistle-blower must possess in order to benefit from the related protected status and, in particular, to explain how

these professional reports will be collected and processed, by whom, and how quickly.

“Compliance” responsibility

In light of its various activities, Forward Global has decided to create an Ethics and Compliance Officer position, under the supervision of the Group’s Legal Department, even though this is not currently a legal requirement. The officer’s main duties are to: design and then implement and lead a compliance programme adapted to the Group’s various risks; ensure that the Group’s annual risk mapping is correctly completed; act as a global “Ethics contact person” for the Group, whose primary mission is to answer all the ethical questions that employees might have, after having looked for the answers on their own in the various applicable procedures that make up the Group’s compliance programme; and finally, advise operational staff on the feasibility and legal soundness of their projects.

Compliance monitoring and managing conflicts of interest

The Group has decided to adopt a procedure called “Compliance & Integrity Check” to assess the ethical and legal soundness of the various third parties it interacts with, including clients, suppliers and subcontractors. These third parties will be subject to more-or-less-thorough audits depending on their risk profile, which is assessed according to a set of objective criteria combined with a risk weighting system.

The nature of the Group’s clients and activities requires it, more than any other, to be particularly vigilant when it comes to managing conflicts of interest. The group has therefore established a procedure related to conflicts of interest to identify risk situations and prevent the occurrence of conflicts by, on the one hand, setting up a register of interests in order to make it mandatory to disqualify, even on a temporary basis, a person who considers themselves to have a conflict of interests with respect to a particular transaction and, on the other hand, to determine, before starting any new business undertaking, whether the Group is serving opposing public or private interests, which would represent a conflict of interest. Appropriate penalties are imposed if these rules are not followed.

Staff awareness and training

Since most breaches are not voluntary and, in most cases, arise from a lack of knowledge of the applicable rules, either by employees or third parties with whom the Group interacts, the Group has set itself the objective of regularly organising a training and awareness session on the ethical rules in force for each of its core business areas. During these sessions, the Group will ensure that Employees are fully familiarised with the content and guidelines for all the tools that make up the entire compliance policy, with the aim of maintaining and building on its compliance programme based on feedback from employees on their use of the various programme tools on a daily basis.

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