

Forward 

Code of Ethical Conduct

SEPTEMBER 2023

1. Preamble

Forward Global Group (hereinafter the “Group”) has experienced constant strong growth and technological innovation, its international business strategy and several acquisitions.

The Group operates in a very diverse business environment, offering a range of services including cybersecurity, technical assistance, dispute resolution, illicit trade prevention and strategic intelligence, particularly in the area of business development and mergers-acquisitions, business ethics, compliance and public relations.

The Group has organized its activities into three main business areas: (i) Cybersecurity; (ii) Risk Management and Strategic Intelligence; and (iii) Public Relations.

Since its creation, the Group has gradually hired a significant number of new employees who are in charge of developing activities that can entail risks and therefore require the definition of guidelines and a legal and ethical framework to ensure that all employees, regardless of the subsidiary where they work, abide by a common set of values and rules.

The Group has also decided to enact an Ethical Charter (hereinafter, the “Charter”), identifying all the values it pledges to observe and to ensure that all of its employees and stakeholders do likewise.

In addition, the Group has established new governance, outlined in the Charter, which chose to create a Code of Ethical Conduct (hereinafter the “Code”) to complement the Charter and ensure its values are fully respected and promoted. The Code aims to provide those to whom it applies with practical recommendations on how they should act in their daily professional activities in order to respect the Group’s ethical values set out in the Charter.

Since the Group’s various business areas present different and specific risks, the Code is divided into two parts. The first establishes general rules on ethics that apply to the target audience for the Code, whereas the second sets out ethical rules that should be followed by certain Group employees in particular, according to their specific business area.

The Code was approved by the Group’s Supervisory Committee prior to the date of its entry into force indicated in the header and submitted to the Group’s employee representative bodies for information and consultation, in order to be incorporated by reference into its by-laws.

Therefore, if a person subject to this Code should fail to comply with any of its provisions, they may incur the disciplinary sanctions referred to in the Group’s by-laws, which are applied in a gradual, reasonable and proportionate manner. The application of disciplinary sanctions does not preclude the Group’s right to simultaneously or successively initiate one or more civil or criminal legal proceedings against the party in breach, especially if the individual in question is not a Group employee and therefore cannot incur disciplinary sanctions.



2. Scope of the Code of Ethical Conduct

2.1 With regard to Group Employees

For the purposes of the Code, the term “Employee” refers to all staff members employed by the Group’s parent company or any of its subsidiaries within the meaning of Article L233.1 of the French Commercial Code and, more broadly, by any of its affiliated entities, regardless of the share of capital held, the directors (whether or not they are corporate officers) and all Group partners, including those connected to the Group solely by means of a consulting contract. This category also includes any person providing services to the Group on a regular, occasional, full-time or part-time basis, in exchange for wages or compensation of any kind (intern, apprentice, freelance, etc.).

In its latest version, the Code applies as of its date of entry into force to all Group Employees, regardless of their activity, the country where they work and their hierarchical level.

The Code applies to all Group locations, both in France and abroad.

All employees are required to read the Code, which is available for consultation on the forwardglobal.com website.

The Code is also available on the Group’s website (or, if the Code is not yet available on the date of publication of this Charter for technical reasons, the Group has the obligation to upload it to the website within 3 months of its publication, even if a new website version is created) and is posted on premises as an appendix to the by-laws.

All employees are required to act in accordance with this Code. Within the Group, each individual’s behaviour must comply with and reflect this Code of Conduct. Ignorance of this Code will not be accepted as a valid excuse.

2.2 With regard to third parties

All third parties, including natural and legal persons, who enter into a contractual relationship with the Group, including but not limited to: subcontractors (including individual freelancers working under “self-employed” or “individual entrepreneur” status), business partners, co-investors in joint ventures, clients, suppliers of goods and/or services, banks, consulting firms, business consultants and business facilitators, are also strongly encouraged to follow the rules of the Code, which may, where appropriate, be sent to them during contractual negotiations, either spontaneously or on request. They are responsible for verifying that the standards they apply are equivalent to ours, in particular with regard to their employees and, where appropriate, to remedy any shortcomings.

By 1 September 2023, in order to allow time for the Group to update its procurement procedures, compliance with the Code will become a binding contractual obligation for all



Group subcontractors through the integration of specific clauses in the contracts the Group uses for the provision of services. The Group may therefore choose to terminate contracts with subcontractors for the provision of services without any prior notice or compensation, with the additional obligation, where appropriate, to pay the Group compensatory payments proportionate to the damage suffered as a result of any breaches found.

More generally, this Code is made public to all our external stakeholders: host countries, local communities, clients, suppliers, industrial and business partners and shareholders. It expresses the Group's commitment to each of these stakeholders.

2.3 Other situations

This Code of Ethical Conduct is a general framework that guides the Group's decision making and sets the rules for responsible professional behaviour. It cannot anticipate every possible situation that may arise. It assumes that all employees and third parties involved in the Group's development will be able to assess situations and make the best possible decisions according to the difficulties they encounter, in compliance with the applicable laws and regulations, and in keeping with the intent of the Code of Ethics and the Group Code of Ethical Conduct, or refer to a supervisor or external advisor if necessary, rather than engaging in any reckless behaviour or negligence, or if they are in doubt.

3. Fundamental principles

The Group's legitimacy is dependent on its capacity for innovation, creativity, technical expertise, agility, its agile and responsive organisation, its protection of individual initiatives made possible by our responsibility to one another, and by integrating its entrepreneurial approach in a legal and ethical framework.

Consequently, the Group undertakes to respect and promote human rights and basic freedoms, to exercise vigilance in its identification of potential direct or indirect negative impacts that its activities may have on society in order to prevent them and, where necessary, remedy them.

The Group contributes to the economy of the countries in which it operates and, in particular, undertakes to comply with the applicable laws and fulfil its social and tax obligations.

The Group is also 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 applies the principles set out in the core International Labour Organization conventions and the United Nations Guiding Principles on Business and Human Rights.

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 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.

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, preventing money laundering, complying with trade restrictions and international sanctions programmes and acting in accordance with an ethical and fair framework in the public sphere.

4. Benchmarks

We comply with all applicable national and international laws and standards for our activities. We implement the OECD Guidelines for Multinational Enterprises, as well as the principles of the United Nations Global Compact. In the event of any discrepancy between legal requirements and our Code of Conduct, we apply the highest standard.

5. General ethics rules

5.1 Defence of the best interests of the French nation

In accordance with its statutory provisions, regardless of the assignments entrusted to it and the 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*).

5.2 Anti-bribery actions and integrity

Bribery is defined as a situation in which a person in public or private office unlawfully offers or promises to offer a bribe, whether directly or indirectly (active bribery), or requests or accepts an offer or promise of any kind of a gift or improper advantage (passive bribery) in exchange for performing, delaying or refraining from performing (or for having performed or refrained from performing), an act incumbent upon by their position, assignment or mandate.



Examples of bribery within the Group may include:

- A sales manager makes inquiries to identify the natural person who is in charge of a public call for tenders, then meets the individual to propose remuneration for a fictitious service, in exchange, at least, for obtaining tenders submitted by their competitors, or in exchange for the guarantee of being chosen as the successful bidder ;
- A decision-maker for the purchase of equipment accepts an invitation from a supplier to attend an event costing an ostensibly disproportionate amount, knowing that the latter expects the renewal of their contract in return ;
- A manager agrees to grant a paid internship to a child of one of the Group's clients to ensure that the client will continue to use Forward Global' services ;
- A Group employee in a foreign country accepts an administrative employee's request for payment of a small sum of money in local currency in exchange for a quick solution to a problem.

The Group prohibits all forms of bribery and undertakes to observe all applicable local laws aimed at fighting bribery and similar offences that jeopardise integrity, such as influence peddling, illegal taking of interest, misappropriation of public property, favouritism, and corruption. It abides by the French Sapin Law (*Loi Sapin II*), the US Foreign Corrupt Practices Act and the UK Bribery Act in all locations. In cases in which these laws conflict, the highest standard of the three applies. Each of these laws are applied extraterritorially, in addition to local, non-extraterritorial laws pertaining to these issues.

For more information on practices that are acceptable or unacceptable in terms of bribery and related offences, please refer to the Group's Anti-Bribery and Anti-Corruption Policy, published in July 2022, which can be requested from the Group's legal affairs officers and human resources managers or accessed online via the Ethics and Compliance section of the Group's website, as soon as technically possible (failure to post this procedure on the Group's website will not cause it to become inapplicable).

5.3 Prevention of conflicts of interest

In simplified terms, conflict of interest refers to any situation in which a personal interest, whatever its nature, whether private or public (emotional, family or friend related, financial, capital, associative, cultural, sports related, political, moral, charitable, religious, trade union related, philosophical, etc.) of a company employee, goes against the interests inherent in their professional duties. In such cases, the desire to safeguard one interest may cause the employee to make a decision that would harm the other interest.



Examples of conflicts of interest within the Group may include:

- In the case of a dispute, two opposing parties contact the Group to request support ;
- A competitor of one of the Group's major clients approaches one of its employees regarding a genuine or fallacious commercial request, for the sole purpose of obtaining confidential information about their competitor, which is one of the Group's clients ;
- In some markets, especially those in which the supply of services is limited, two competing clients may wish to commission the Group for similar assignments, but the completion of the assignment for the first client could harm the interests of the second client ;
- The Group's interests, through its shareholders, directors and/or beneficial owners, may conflict with those of one or more of its clients ;
- Working as a director, manager or advisor of a competitor of Forward Global or its subsidiaries, or engaging in any activities aimed at promoting a competitor's interests ;
- Having a direct or indirect personal, family-related or financial interest in any entity providing goods or services to the Group, such as a supplier, service provider, potential acquisition target, lessor, client or competitor ;
- Taking personal advantage of an opportunity that was solely revealed through information obtained in a professional context ;
- Using assets, property or information from Forward Global, including a professional position, to obtain personal benefit or improper personal gain in order to pressure others or to pursue a personal interest.

To prevent the occurrence of such conflicts, the Group commits to systematically carrying out a "conflict check" every time it interacts directly or indirectly with potential new business prospects, based on the global digital database listing all of its clients and prospects worldwide in all business areas.

Furthermore, the Group is, by principle, undertakes to refrain from working simultaneously, through its employees, for two or more natural and/or legal persons in competition and/or with interests that are notably contradictory, except in the following cases :

- by way of exception, with the express agreement of all parties concerned ;
- in cases in which the services offered are of general interest (e.g., ensuring the security of a client's computer system does not prevent the Group from ensuring the security of its competitor's computer system, unless the first client insists on the exclusivity of the Group's commitment in its sector of activity) ;
- when the services are of a different nature, and one of the services provided by one of the clients has no impact on the purpose of another service provided by its competitor.



5.4 Compliance with laws to protect and secure personal data

The French Data Protection Authority, CNIL (*Commission Nationale Informatique et Libertés*) defines personal data as any information relating to a natural person which is likely to enable their direct or indirect identification, regardless of whether it is confidential or not, such as a person's name, social security number, photo, email address (personal and/or professional), postal address, bank details, etc.

This private data deserves to be protected, in particular in application and in view of French law, the French Data Processing, Data Files and Individual Liberties Law of 1978 (as amended in June 2019) and of the European General Data Protection Regulation (GDPR), which came into force in May 2018.

This protection means that the person whose data is collected must be informed of this and must be granted their rights, throughout the legitimate data processing period, to consent to the collection of data, to access, rectify and/or request the deletion of the data, if its use, communication and/or storage, are not or are no longer done for a specific, legitimate, necessary purpose, in accordance with the laws in force.

Since Group employees are required to process data that is not only personal, but often sensitive and confidential, it is all the more important for them to be trained, or at least be made aware, depending on their specific business area, of the issues linked to compliance with any applicable local personal data protection laws. If they have not yet been trained, they can request specific training or an introduction to these issues from their manager, which is to be provided within a reasonable time frame and within two months at the most. Employees shall therefore be very attentive to these issues and be careful not to voluntarily or involuntarily undermine the legal principles in force in any way, in accordance with the internal procedures established by the Group in this area.

5.5 Human rights

Employees are the Group's most important asset and their well-being is a priority. To guarantee this well-being, the Group does not tolerate any practices that would jeopardise their dignity and the respect of their basic human rights.

All forms of harassment (psychological and sexual), violence or assault (physical and psychological), lack of respect, discrimination (gender-based or ethnic) at the time of hiring and throughout the duration of the employment contract, are therefore fully prohibited and punishable both in terms of internal disciplinary sanctions and, where appropriate, legal proceedings.

The Group also promotes inclusiveness and equal treatment and endeavours to contribute to the development of its Employees' skills, by prioritising opportunities for regular training in their initial skill sets or in other areas.



In its choice of projects, it also avoids involvement in countries that are notorious for violating human rights, such as freedom of expression, equality before the law, privacy, the rights of children to be protected against economic and social exploitation, and gender equality, which were reiterated in the Universal Declaration of Human Rights of 1948 and the two covenants of 1966, the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights, all three texts of which constitute the International Bill of Human Rights.

The Ethics Committee therefore exercises caution, carefully examining all projects that could potentially involve risks in these areas, and may veto a project within the limits of the Regulations, which establish the existence of this committee and defines its operation. Ultimately, the Group decides whether a project provides sufficient guarantees in this regard on a case-by-case basis. In other words, the Group may accept projects in countries where “human rights are most at risk”, as long as the stakeholders involved in the project itself can provide the Group with sufficient material evidence that the rights of those involved in the project are sufficiently guaranteed.

5.6 Safety

Safety is one of the Group’s core values. Without it, companies cannot be secure, reliable or sustainable. This means that safety cannot be compromised on. It cannot be reduced to a question of costs, because it is a value that is respected above all others. Ensuring safety is a daily battle, one fought with humility and vigilance. We must never let our guard down. Nothing is inevitable: all accidents, even the most minor, can be avoided.

Employees must therefore know and follow safety rules at all levels with the utmost vigilance. Each employee has the personal responsibility and authority to intervene if these rules are not followed or if they perceive a risk.

The Group prioritises its partners’ ability to apply a policy that is equivalent to its own when choosing its industrial, technological and business partners.

5.7 Social and environmental responsibility and sustainability

Although the Group’s activities do not, in principle, have any major and/or short-term impacts on the environment, since it primarily provides intellectual and non-industrial services with a limited carbon footprint, it nevertheless wishes to be a sustainable company and has therefore taken steps to obtain an international label or certification for its CSR approach.

The Group is fully aware of the individual challenges posed by the fight against global warming, efforts to preserve non-renewable natural resources and the development of renewable energy sources. Employees therefore try to reduce their energy consumption, avoid unnecessary waste and make the best use of resources, for example by limiting to a minimum the use of the most polluting means of transport, as much as possible in their daily work.



5.8 Countering money laundering and the financing of terrorism

Money laundering is the concealment of the illicit and/or fraudulent origin of funds, such as money from drug trafficking, illegal arms trafficking and tax evasion or fraud, and reinvesting them in legal activities to give them an appearance of legality.

The Group does not wish to be identified, whether involuntarily, indirectly or without its knowledge, as an accomplice of or partaker in illegal activities, it requires its Employees to remain constantly vigilant regarding these issues. They must therefore strictly follow the Group's internal procedure, titled Compliance & Integrity Check, in particular with regard to clients who are potentially the most at risk, based on objective criteria.

Therefore, if an Employee still has doubts as to the origin of the funds after completing the ethics verification procedure mentioned above, especially for clients based in geographical areas with a reputation for unscrupulous practices or included on blacklists for this issue, they must systematically refer the matter to their Compliance Officer, who will make a decision in conjunction with the Management Committee and Ethics Committee on the action to be taken regarding the project request.

5.9 Compliance with international sanctions, embargoes and export control rules

The Group may receive requests for services from legal entities that have been subject to international sanctions. It also has client companies that are subject to export control regulations, such as companies that design and market military or defence equipment and materials, or goods classified as dual-use items. It is therefore very attentive to all applicable international sanctions, embargoes and export control regulations.

International sanctions may be imposed by the UN Security Council based on a violation of UN Member State laws, by the European Union, by the United States (notably through the Office of Foreign Assets Control – OFAC), or by other unilateral regimes.

Three types of sanctions are generally imposed :

- economic sanctions, entailing a restriction on the import and/or export of certain types of goods and/or services in certain sectors of activity, or the prohibition of certain operations ;
- individual sanctions, such as the freezing of assets or restrictions on admission of designated individuals and/or entities, in the case of sanctions imposed by the European Union (referred to as “EU Sanctions”) and against Specially Designated Nationals, in the case of sanctions imposed by the United States (referred to as “US Sanctions”) ;
- or an embargo on raw materials and/or arms.



Therefore, in order to ensure that the international sanctions and embargoes in force are always respected, the Group's operational Employees, assisted as necessary by the Group's Compliance Officer and Compliance Department, check whether each new prospect or client entering into a business relationship with the Group is listed on any of the updated international economic sanctions lists for States, legal entities and natural persons established by the UN, the EU or the US.

5.10 Prohibition of all anti-competitive practices

Compliance with applicable competition laws is crucial for the Group, whose Employees must be chosen legally, honestly and fairly, based solely on their skills.

Certain practices are therefore prohibited, such as price fixing, the exchange of confidential information in the context of public tenders, the formation of cartels, abuse of dominant positions and market sharing.

In all circumstances, Employees must refrain from sharing confidential information with competitors, in particular information related to the company's clients, offer and price policies, business strategies, supplier prices, etc., especially in the context of the international fairs and forums they organise and/or during meetings and evening events organised by the various professional associations to which they belong according to their profession.

5.11 Funding of political parties, sponsorship and patronage

Although the Group does not refrain from inviting, discussing and working with elected or former elected officials and candidates or former candidates for elections, in particular as part of the Political Action Committees (PAC) in the United States, the Group formally prohibits the funding, as a company, of any electoral campaign for any political party, as well as the funding of its general operations.

For its sponsorship and patronage operations in France and abroad, the Group selects projects that are consistent with its values and activities and submits them, prior to making its decision, to the Group's Ethics Committee for review. It also works with its stakeholders to ensure, by imposing strict agreements, that these operations are not intended to give a legal appearance to any criminal act, such as bribery or similar offences.

5.12 Freedom of association, collective bargaining and political involvement

The Group is committed to creating working conditions that ensure respect for individuals, freedom of association and collective bargaining. It does not tolerate any forms of harassment.

It respects the privacy of its employees. In terms of involvement in the political sphere,



employees have the right to participate in political activities on an individual basis, making it clear that they do not represent their company and informing their supervisors of any activities that may give rise to a conflict of interest.

5.13 Intellectual property rights

The Group's intellectual property, such as ideas, inventions, discoveries, trade secrets, copyrighted material, patented material and trademarks, is a valuable asset that must be protected.

Except for limited exceptions, Forward Global and its subsidiaries own all products, processes, information, models, databases, software, documentation, methodologies and other materials, inventions, developments, discoveries, research and any intellectual property related to the Group's business, which have been created or modified by Group Employees while working for the Group.

In addition, the Group's brands and logos belong to the Group and must be used carefully, in a suitable, reasonable and responsible manner and in a way that promotes them.

The Group's Employees also undertake to respect all the copyright and intellectual property rights of which they are aware.

5.14 Expression on social networks

Forward Global encourages Employees to use and communicate on the various social networks. However, they must exercise good judgement in their use of these networks and bear in mind that information published on the internet can remain in the public domain indefinitely and instantly reach a global audience.

Group Employees must therefore never disclose confidential or proprietary information about the company or its clients and partners. They must also refrain from publishing any information that could embarrass or damage the reputation of the Group or related parties, since we are all ambassadors of the Forward Global brand, as well as the other brands owned by the Group, and must therefore always act in a way that reflects our core values. Moreover, unless Employees are authorised to speak on behalf of the company, their published content does not necessarily reflect the views of Forward Global and its related entities.

5.15 Other operational requirements

Our clients' motivations for using our services vary greatly.

Regardless of the assignment, its financial dimension and the profile of the client requesting it, Group Employees and their subcontractors undertake to comply with the applicable laws and regulations as well as the Group's Ethical Charter and the present Code and, in particular,



to observe the following rules:

- (i) never steal, keep or illegally process data entrusted to them, whether for their personal use, to disclose such data to a third party free of charge, or to sell data to a third party (a Client's competitors or others);
- (ii) never commit a breach of confidentiality by disclosing confidential data which they have accessed in the context of their assignment, outside the authorised professional setting;
- (iii) never consult data contained in recovered files unless it is for a specific imperative technical purpose;
- (iv) comply with all applicable civil and criminal laws and regulations, particularly with regard to digital communication;
- (v) comply with the standards, rules and doctrines established by the regulatory authorities that govern their activities;
- (vi) comply with applicable local and supranational ethical communication rules;
- (vii) never deceive or mislead readers regarding the origin of the information received, in other words, the author must not, for example, create a fake profile impersonating another person online, or create a false identity that does not belong to an actual person;
- (viii) never deliberately defame or slander anyone;
- (ix) ensure the accuracy of the sources used or shared in their work in order to avoid knowingly sharing any false, inaccurate or misleading information;
- (x) never create content that they know to be false, in particular with the aim of defending the interests of one of the Group's clients;
- (xi) ensure the genuine nature of the experts to whom they refer when needed, especially if they present their opinions as coming from an expert.
- (xii) comply with all the legal obligations incumbent upon them in terms of declaring representations of interest to the relevant local authorities;
- (xiii) never represent the interests of a State, legal entity and/or natural person while the latter is subject to international economic sanctions and/or an embargo, unless expressly authorised to do so by the public authority;
- (xiv) never participate in interest group operations in the context of ongoing election campaigns;
- (xv) comply with the ethical rules set out in in the codes of conduct and/or ethics charters for professional associations and organisations to which the Group adheres, through one of its subsidiaries or entities;
- (xvi) never directly or indirectly contribute to increasing the concentration of power in the hands of a person or group of persons who act in a dictatorial manner in a country, with absolute power not limited by laws or institutions, although this does not prevent the Group and its Employees from contributing to any initiatives that would support the country's economic development or



- its people;
- (xvii) never create content or present it as objective and/or as if it were the result of journalistic investigation if this is not the case and is in fact promotional content provided by a client;
- (xviii) never, by their actions, endanger anyone's life or pose a threat to a country's national security;
- (xix) never infringe on the confidentiality of journalistic sources;
- (xx) never infringe on the confidentiality of deliberations of any type, including judicial deliberations;
- (xxi) never wrongly and illegally use inside information obtained in a contractual and confidential context;

5.16 Whistleblowing

Any employee who has doubts about the right attitude to adopt or the interpretation of principles set out in the Code, or who is confronted directly or indirectly with breaches of this Code, should contact their supervisor, human resources manager, the Legal Department, or any other authorised person.

The Group has established an in-house whistleblowing system for collecting and processing reports submitted by any employee concerning breaches or risks of breaches of the provisions of this Code. This whistleblowing system is accessible to all employees and external persons.

In compliance with the applicable regulations, this system guarantees the confidentiality of the procedure, as far as possible and within the limits defined by the laws in force. Acts of repression against those who have used this system in good faith will not be tolerated, even if the suspicions at the origin of the report prove to be erroneous.

In general, if a Group employee should, by chance, within the legal and legitimate context of their activities, discover the existence of criminal acts, they must not hesitate to report them to the competent authorities, in particular in order to stop or prevent the offence or crime in question from being repeated.

6. Code of Ethical Conduct compliance and implementation

6.1 Communication

The Code of Conduct aims to ensure the integrity of the Group's operations. It is communicated to all Group subsidiaries and all Employees, who are required to comply with it.

The Code of Conduct is published on the Group's website. It is accessible at all Group offices, in France and abroad.



The managers of all Group entities are responsible for ensuring that is distributed, understood and effectively applied, which involves regularly referring to it in the presence of their team members to ensure that it is correctly understood, as well as promoting dialogue to encourage Employees to share any concerns with confidence, reminding them of the whistleblowing procedure and, where necessary, referring them to the Legal Department, the Human Resources Department, the General Management or the Ethics Committee.

6.2 Operational application

Its main principles apply to the following areas: client or supplier relationships, recruitment, information system security, preventing bribery, compliance with competition law, advertising, the performance of tasks assigned to the Group, protection of the environment and any other subject or area covered by this Code.

6.3 Operational responsibility

The Group's Legal Department is in charge of managing the ethics or compliance policy. This department must be led by a qualified or experienced person who demonstrates considerable maturity in the area of legal, regulatory, social and ethical matters.

Managers must ensure that the employees they are responsible for strictly comply with the Group's Code of Ethical Conduct and must themselves exhibit exemplary behaviour.

6.4 Updating

Every two years, the Legal Department will draw up a risk map in order to identify and prioritise areas not covered in this Code in which the Group is exposed to risks, or those that are not sufficiently addressed by the Group's internal measures.

6.5 Training

The Group wishes to enable its employees and the third parties with whom it interacts to fully understand the ethical requirements concerning them. The Group therefore provides the staff members and executives most exposed to the risks of bribery, influence peddling and money laundering with training on a regular basis or on request. It provides training on social responsibility and the prevention of discrimination to recruiters, directors and managers, and the Human Resources Department constantly monitors its recruitment practices.

