

ANTI-CORRUPTION POLICY

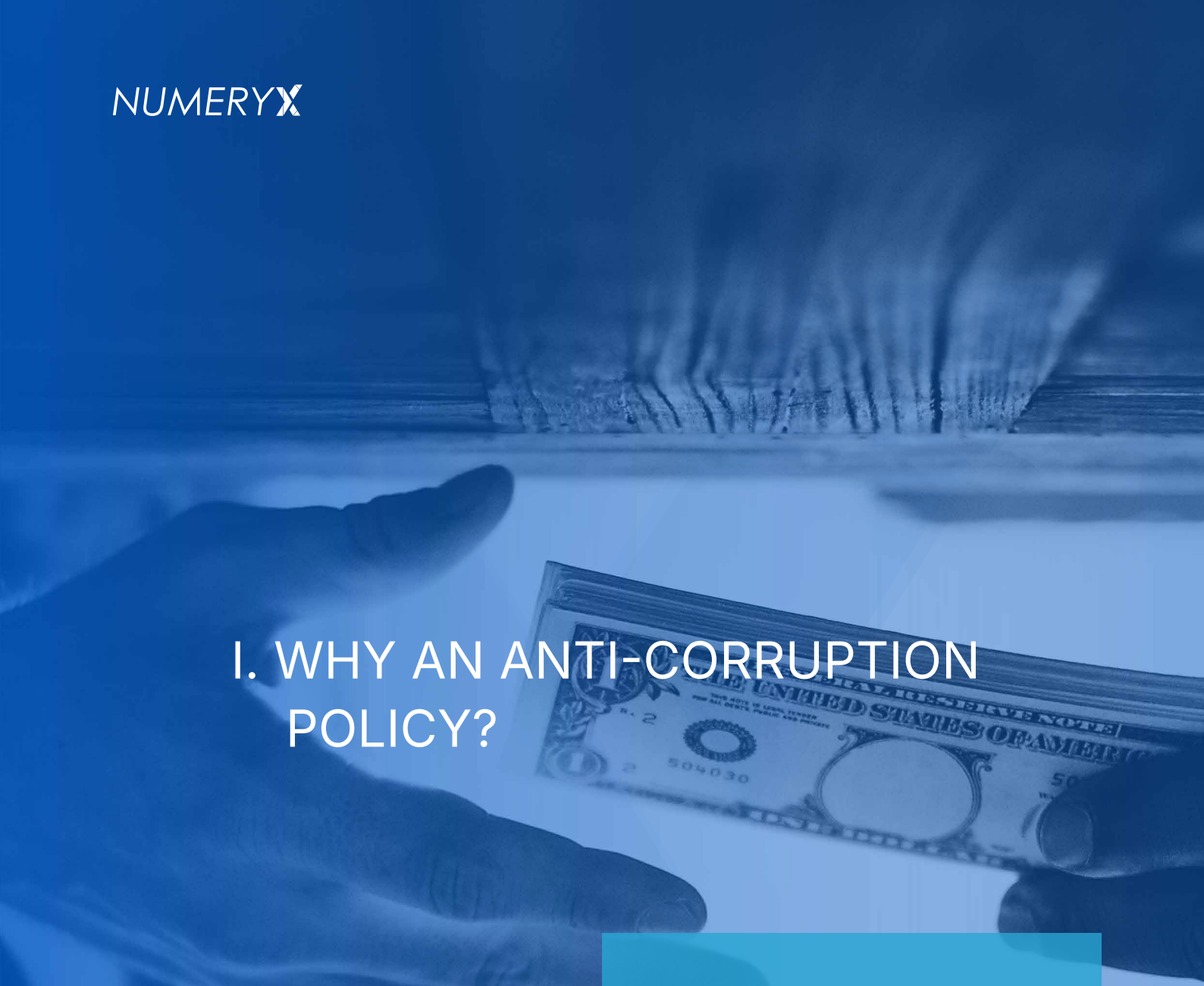
NUMERYX TECHNOLOGIES

NUMERYX

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I. WHY AN ANTI-CORRUPTION POLICY?

NUMERYX Technologies is committed to putting in place a robust anti-corruption policy in order to obtain the EcoVadis Silver label in 2025.

This policy aims to prevent, detect and sanction any act of corruption, by ensuring total transparency and irreproachable ethics in all our operations. Our commitment to ethics and transparency is at the heart of our values.

By implementing this anti-corruption policy, we also aim to foster a culture of trust and integrity within our company and its subsidiaries in France.

MESSAGE FROM THE CHAIRMAN

"ZERO TOLERANCE"

This is the watchword that applies to every employee of NUMERYX Technologies when it comes to corruption, in the same way as the notion of Zero Trust in cybersecurity.

As a signatory of the United Nations Global Compact, which invites companies to "act against corruption in all its forms", our group must naturally prevent and detect any attempt at corruption and influence peddling in its relations with its various stakeholders.

Discernment, a sense of responsibility and ethics therefore bind each and every one of us. We must also recognize the particularly high economic, social and reputational cost of any breach of probity.

NUMERYX Technologies has published an Ethics Charter, which will be reviewed every year.

The cornerstone of our ethics and compliance policy, it is supplemented by this anti-corruption policy, which will also be applied as an extensively illustrated code of conduct, updated to inspire everyone's behavior in a perpetual search for integrity.

We count on your exemplary conduct, a sine qua non for the pursuit of NUMERYX Technologies' sustainable and responsible performance.

MONDHER AYADI
CEO NUMERYX TECHNOLOGIES



SCOPE OF THE ANTI-CORRUPTION POLICY

This Anti-Corruption Policy applies to all directors, officers and employees of NUMERYX Technologies and all of its controlled subsidiaries, as well as to the Board of Directors.

This policy applies to the activities of NUMERYX Technologies nationwide, at the NUMERYX Technologies headquarters based in Meudon, in its current subsidiaries (Lyon and Le Havre), and through the actions of any employee representing NUMERYX Technologies at its clients and partners as part of consulting services.

This policy reflects the standards that NUMERYX Technologies expects any person or entity providing services on behalf of NUMERYX Technologies to comply with when acting on its behalf. These persons or entities acting on behalf of NUMERYX Technologies may include business associates, partners, agents, intermediaries, representatives, suppliers, contractors, third-party service providers and consultants (collectively, “third parties”).

Please direct all questions and requests for authorization relating to this policy to the Ethics Officer (Mr. Laurent THOMAS), or to any manager or person above manager level within NUMERYX Technologies (a “senior executive”).

NUMERYX TECHNOLOGIES' OBLIGATIONS

What are NUMERYX Technologies' obligations in terms of combating corruption and influence peddling?

All companies controlled by NUMERYX Technologies, in France and abroad, must comply with the anti-corruption regulations as well as with the ethics charter and the various charters of NUMERYX Technologies.

At NUMERYX Technologies, the corruption and influence-peddling prevention and detection plan is built around the following measures:

- an anti-corruption code of conduct / this anti-corruption policy,
- a whistleblowing system,
- a corruption risk analysis,
- accounting control procedures, outsourced to our accounting firm,
- a training and awareness program,
- monitoring and evaluation of the program's implementation (internal audit).

RISKS FOR THE COMPANY AND ITS EMPLOYEES

What are the risks for the company and its employees?

FOR NUMERYX For the company: significant fines accompanied by publicity measures, bans on bidding for public contracts in France or abroad, the impossibility of making a public offering of securities, and significant consequences for its reputation, its business and its financial position (e.g. loss of market valuation, loss of clients and partners, ...).

FOR EXECUTIVES AND EMPLOYEES For executives and employees: in addition to disciplinary sanctions for failure to comply with this code, a prison sentence of several years on top of a substantial fine, confiscation of assets and possible deprivation of civil rights.

No act of corruption or influence peddling committed by an employee may be considered as having been committed in the interest of and/or on behalf of NUMERYX Technologies or any of its companies.

FOREIGN LAWS In addition, certain acts of corruption or influence peddling may also be punished by foreign laws with extraterritorial reach. This means that an act of corruption or influence peddling committed by an executive or employee of NUMERYX Technologies, wherever they are, could constitute an offence under foreign law. It could thus constitute an offence under both French law and foreign law.

OBJECTIVES OF THE ANTI-CORRUPTION POLICY

What are the objectives of this anti-corruption policy?

This code of conduct lists NUMERYX Technologies' commitments in the fight against corruption and helps to spread its ethical culture. As such:

- it illustrates what corruption is, what is at stake, its forms and its risks;
- it presents examples of situations in which it may arise and the most common warning signs so that it can be identified;
- it sets out the behaviors to adopt and the procedures to follow in order to best prevent it and remedy it if it occurs;
- it points to the detailed procedures and specific functions that can help each employee in case of doubt.

This framework cannot be exhaustive given the diversity and multiplicity of situations that may be encountered in the field. It nevertheless constitutes a practical tool for making the decision best suited to the circumstances.

In case of difficulty interpreting this document, each employee is invited to discuss it with their colleagues, their line manager and, first and foremost, **the Ethics Officer (Mr. Laurent THOMAS)**.

COMPLIANCE WITH THE ANTI-CORRUPTION POLICY

This anti-corruption policy also represents a code of conduct that applies to all persons bound by an employment contract with NUMERYX Technologies, regardless of their hierarchical level, geographic location or the entity to which they belong.

II. CORRUPTION AND ITS DIFFERENT FORMS



Corruption occurs when a public official or a manager/employee of a company behaves dishonestly and/or illegally and exploits their position of authority to obtain an advantage or to help their friends or associates obtain jobs or contracts unfairly or illegally. Preventing and detecting corruption depends in particular on knowing the main offences that give rise to this risk.

CORRUPTION CAN BE PASSIVE OR ACTIVE

Corruption is passive when a person takes advantage of their position by soliciting and/or accepting, directly or indirectly, gifts, promises or advantages of any kind, for their own benefit or that of a third party, in order to perform or refrain from performing an act of their activity or function. This person is referred to as the bribed party.

Example: A public official demands a sum of money from an employee in exchange for a tangible or intangible asset.

Corruption is active when a person offers and/or grants, directly or indirectly, gifts, promises or advantages of any kind, for their own benefit or that of a third party, to a person so that they perform or refrain from performing an act of their function. This person is referred to as the briber.

Example: An employee invites a member of parliament to the final of a prestigious sporting event to convince them to table a legislative amendment favorable to NUMERYX Technologies.

CORRUPTION CAN BE PUBLIC OR PRIVATE

Corruption is said to be public when the bribed party is a public official, that is to say:

- any person vested with public authority (state civil servant or local or regional public authority official);
- any person entrusted with a public service mission (in particular a person employed by a public body or by an association mainly funded by public funds);
- any person holding a local elected mandate (mayor, member of parliament, ...);
- any person employed by an international public organization;
- any company in which a State or public entity holds shares or an interest.

In certain circumstances, giving an advantage to persons acting on behalf of a public official, or to the public official's relatives, may also be considered an act of bribery of a public official.

It is said to be private when the bribed party is not a public official and generally involves individuals or entities in the private sector. This may concern company employees, executives, or any other person without public status who accepts or solicits undue advantages to perform or not perform acts within the scope of their private duties.

WHAT IS THE OFFENCE OF INFLUENCE PEDDLING?

French law distinguishes the offence of corruption from that of influence peddling. Influence peddling is an offence aimed at persons who, by abusing their influence over a third party, manage to obtain a financial, economic or other advantage. Like corruption, influence peddling can take different forms.

ACTIVE AND PASSIVE INFLUENCE PEDDLING

Influence peddling is passive when a person solicits or accepts an advantage in order to use their influence, real or supposed, directly or indirectly, to obtain a favorable decision for the person who granted them that advantage.

Example: A minister requests a job for his daughter in exchange for an honor for the person who agrees.

Influence peddling is active when a person offers an advantage to another, or has yielded to the latter's solicitations, so that they use their influence, real or supposed, directly or indirectly, to obtain a favorable decision.

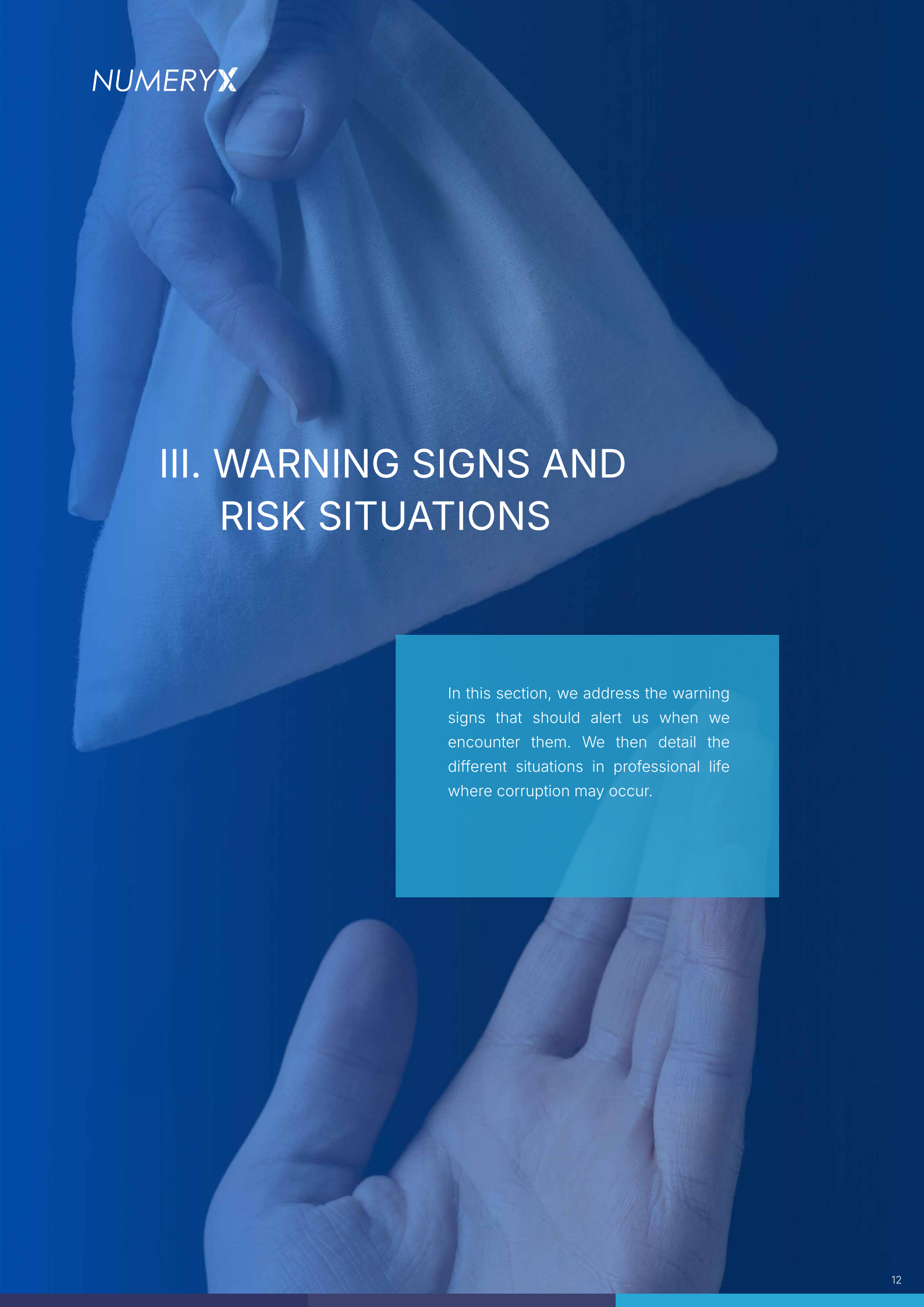
Example: An entrepreneur gives money to a public official so that the latter influences the awarding of a public contract to the company of a member of the entrepreneur's family.

DIFFERENCE BETWEEN CORRUPTION AND INFLUENCE PEDDLING

The major difference between corruption and influence peddling lies in the number of persons involved in committing the offence. Corruption involves a briber and a bribed party. The bribed party abuses their power for the benefit of the briber. Influence peddling involves a third party who abuses their influence over a decision-maker, for the benefit of the beneficiary of the decision.

PENALTIES IN FRANCE As with corruption, merely making a proposal or a promise is enough to constitute the offence. In France, the penalties incurred for influence peddling are similar to those prescribed for corruption.

WARNING: Corruption and influence peddling are strictly prohibited even when carried out for the benefit of the company and without direct or indirect profit for the employee.



III. WARNING SIGNS AND RISK SITUATIONS

In this section, we address the warning signs that should alert us when we encounter them. We then detail the different situations in professional life where corruption may occur.

WARNING SIGNS

The practices and behaviors described below must be considered abnormal in business life. If you are confronted with them, you must be vigilant and report the situation to your line manager without delay:

- **any lack of transparency and traceability** in transactions, expenses and statements of operations;
- **any request to bear costs** in cash and/or insufficiently documented, payments without reference to an invoice or an order;
- **any payment method not provided for** contractually or unusual: request for transfer to a third party or to a third country, request to change certain payment terms, ... ;
- **any proposal to use intermediaries unnecessarily or without explanation;**
- **any offer of an advantage and/or request for a gift** in cash or in kind for the performance of a service;
- **any business partner who provides false invoices or other false documents;**
- **any employee of a company or public official who gives the impression of acting alone, outside the structure or body to which they belong;**
- **any request for commissions** / fees / retainers of an amount that is high compared with market practice, without objective reason;
- **any refusal to attest in writing** that they comply with anti-corruption legal provisions;
- **any request for a job**, outside the company's official recruitment process, for a friend or a family member;
- **any request to pay donations** to a charitable organization in exchange for an advantage;
- **any negative information relating to the reputation** of the individual or legal entity with which the business relationship is being formed (adverse article in the local press, previous conviction for breaches of probity, ...).

SITUATIONS LIKELY TO PROMOTE ACTS OF CORRUPTION

As part of NUMERYX Technologies' activities in France and internationally, these situations have been identified using the corruption risk mapping. There are 15 of them:

- bribes
- fraud
- money laundering
- conflicts of interest
- offering and accepting gifts (invitations, gifts, travel, hospitality and expense reimbursement...)
- facilitation payments
- image partnerships
- relations with business partners
- nepotism and favoritism
- accounting entries & bookkeeping
- sponsorship & charitable donations
- fictitious jobs or "consultant" relationships
- job, internship or secondment opportunities
- supply or service contracts
- social benefits

These situations are described in detail below, together with practical advice enabling you to protect yourself and the company against the risks of corruption and influence peddling. The occurrence of these situations may depend on several factors, such as geographic location and the nature of the business relationship.



Bribes

A bribe is a payment or advantage unduly granted to a person so that they influence or alter a decision-making process to their advantage, to the detriment of ethical rules or laws. It is a common form of corruption in which the aim is to divert a decision in order to obtain a personal or commercial benefit.

EXAMPLE OF A RISK SITUATION: An example of a bribe could occur if a software vendor offers an employee of the company a sum of money or a high-value gift in exchange for the assurance that its software will be selected in a call for tenders, even if this software is not the best choice for the company. This could include offering free vacations, expensive equipment, or even a cash bonus to influence the employee.



Fraud

Fraud is a deliberate act intended to deceive or to manipulate information or processes in order to obtain an illegitimate or undue gain. It may take the form of falsifying documents, manipulating accounts, or misrepresenting facts to mislead a person or an organization.

EXAMPLE OF A RISK SITUATION: An example of fraud could occur if an employee deliberately alters the time reports for a client project in order to bill overtime hours that were not actually worked. For example, a consultant could declare having worked 10 hours a day when they actually worked only 6, in order to artificially increase the revenue generated by the project.



Money laundering

Money laundering is the process by which funds obtained through illegal activities (such as drug trafficking, fraud or corruption) are converted into legitimate assets in order to conceal their criminal origin. This process often involves several stages, including placement of the funds, layering them to hide their origin, and finally their integration into the legal economy.

EXAMPLE OF A RISK SITUATION: An example of money laundering could occur if an employee or manager receives payments from shell companies for fictitious IT services. For example, a manager could create a fake subcontracting company, invoice services never rendered, and integrate the funds obtained in this way into the company's accounts by claiming they come from legitimate contracts.



Conflicts of interest

To protect and preserve the image of NUMERYX Technologies, let us avoid conflicts between our private interests and those of the company. To identify such a situation, ask yourself the following questions:

- Do I have a privileged link (family, friendship or professional) with this partner?
- Could this influence or appear to influence my decisions?
- Do I feel a particular obligation towards this third party?
- Would I be comfortable if my colleagues or third parties were informed of this situation?

EXAMPLE OF A RISK SITUATION: A partner offers NUMERYX Technologies a Third-Party Application Maintenance service. The contract, signed by a NUMERYX employee, is in favor of his cousin, a business partner. This employee notices abusive clauses, but the provider promises that it will not happen again. Tempted to approve in order to satisfy his cousin, he must refuse to sign in order to avoid engaging his liability.



Gifts and invitations

(gifts, travel, hospitality and expense reimbursement...)
We may occasionally offer or receive invitations or gifts intended to foster good business relationships. However, these courtesies or tokens of goodwill could constitute, or be regarded as, vehicles for corruption if they do not comply with the rules and principles defined by NUMERYX Technologies and with the law. A gift means any means of payment, gratuity, advantage, present or service offered or received

For example, covering business travel expenses, services or works provided free of charge, and loans of premises. Invitations are any form of event, entertainment (sporting or cultural, vacations, ...), travel, accommodation or meals offered or received.

EXAMPLE OF A RISK SITUATION: During the renewal negotiation of a contract, an employee in charge of drafting the specifications is offered by one of the suppliers a seat to attend a sporting final. This offer must be declined, all the more so when it is made during a sensitive period such as a contract renewal. Apart from the above-mentioned prohibitions in principle, the following rules must be observed depending on whether our counterpart is a public official or a private individual.

- **Prohibition**

As a matter of principle, it is always prohibited to offer or receive a gift or an invitation:

- with the aim of influencing the behavior of, or obtaining something in return from, a third party;
- in the form of cash or equivalent (e.g. gift vouchers);
- in the form of a facilitation payment;
- during a sensitive period such as a call for tenders or a contract renewal.

- **Limits on sensitive transactions**

Each sensitive transaction must have a clear business purpose and be of reasonable value. The value limits for sensitive transactions authorized in France are as follows.

Gifts	Maximum authorized value
Gifts bearing the NUMERYX logo	€30 / unit
Restaurants	€40 / person
Accommodation for prospecting or client relations	€120 / night

For any other sensitive transaction or for a transaction exceeding the above limit values, authorization from the line manager and from the NUMERYX Technologies ethics officer is mandatory.

- **Annual NUMERYX gift sent to partners**

The choice of the year-end gift must be made collectively, taking into account the image of NUMERYX Technologies as an eco-responsible, ethical, tech-oriented company

- **Standard anti-corruption message to be attached to sensitive transactions**

To avoid any risk of a NUMERYX Technologies gift or hospitality gesture being perceived as a bribe by our partners, every sensitive transaction must be accompanied by the following standard anti-corruption message:

"NUMERYX Technologies is committed to maintaining the highest standards of ethics and integrity. We firmly condemn all forms of corruption. We are committed to complying with anti-corruption laws. This commercial gesture is offered without any expectation of anything in return".

EXAMPLE OF A RISK SITUATION: During the renewal negotiation of a contract, an employee in charge of drafting the specifications is offered by one of the suppliers a seat to attend a sporting final. This offer must be declined, all the more so when it is made during a sensitive period such as a contract renewal.



Bribery of public officials

All legislations condemn the bribery of public officials. In this context, any offer intended for them is prohibited. Exceptionally, a courtesy may be extended to them if it meets the following conditions:

1. be of a symbolic amount;
2. comply with applicable legislation;
3. not be made with the aim of influencing them or obtaining something in return;
4. be subject to prior written authorization from the line manager.

EXAMPLE OF A RISK SITUATION: Another example: an IT services company (ESN) could offer financial benefits to an official in charge of awarding public contracts so that they favor the company in the call for tenders. For example, offering a trip or a sum of money to guarantee the signing of an IT services contract with a public administration.



Facilitation payments

Payments, even small ones, that are undue and unofficial, made for the benefit of a public official to secure or speed up administrative procedures within their remit (customs clearance of goods, obtaining a visa, issuing a license, ...) are prohibited. To avoid this kind of situation, it is imperative to follow administrative procedures to the letter and, whenever possible, to pay mandatory administrative fees online. In the event of an undue solicitation or doubt about the nature of a payment request, you must imperatively first consult your manager or your ethics referent.

EXAMPLE OF A RISK SITUATION: A typical example within an IT services company would be if an employee in charge of relations with public administrations grants an advantage to an official to speed up the obtaining of a permit or the approval of a project. For example, an employee pays an official to obtain an IT operating authorization more quickly or to speed up a regulatory check.



Image partnerships

An image partnership or sponsorship is a contract by which NUMERYX Technologies, or one of its brands, seeks to benefit directly from the reputation of a partner (association, charity, ...), of an event (championship, ...) or of an ambassador (well-known athlete, ...) in order to increase the visibility and/or appeal of its brands and products. In exchange, NUMERYX Technologies undertakes to provide financial or material support to said partners, events or ambassadors. These partnerships must not be entered into in order to obtain an unjustified advantage in return (personal benefit, consideration not provided for contractually, ...).

This risk is heightened when the operation involves a public official. To ensure that these operations comply with NUMERYX Technologies' ethical values in all the countries where it operates, the selection of partners is governed by precise rules.

EXAMPLE OF A RISK SITUATION: An IT services company (ESN) could offer financial benefits to an official in charge of awarding public contracts so that they favor the company in the call for tenders. For example, offering a trip or a sum of money to guarantee the signing of an IT services contract with a public administration.



Relations with business partners

Corruption linked to relations with business partners occurs when a company or one of its employees offers or receives undue advantages to influence decision-making in a business relationship. This may involve subcontractors, suppliers or clients, and lead to illegal favoritism when concluding contracts or commercial agreements. NUMERYX Technologies ensures that its relations with its business partners (suppliers, service providers, subcontractors, dealers, clients, ...) are in line with its ethics and compliance rules. To this end, the following provisions are made when formalizing and during the course of the business relationship:

- comply with the procedures and rules in force, in particular regarding asset disposals, selection of suppliers, dealers, importers, or donations, sponsorship operations, image partnerships, ... ;
- include in contracts with third parties anti-corruption clauses allowing in particular the termination of the agreements concluded and the interruption of any relationship.

When using an intermediary, that is to say any independent person (lawyer, sales agent, representative, ...) acting on behalf of or on the orders of NUMERYX Technologies to conclude, develop, sustain or bring business to completion by means of contacts or information, it is necessary to ensure, in addition to the above:

- that any remuneration granted is transparent and corresponds to a legitimate and effective service rendered to NUMERYX Technologies;
- that its service is precise in its content but also in the means of achieving it.

Evidence of the services provided by this intermediary must be subject to appropriate checks to ensure the reality of the service.

EXAMPLE OF A RISK SITUATION: A purchasing manager receives expensive gifts or money from a supplier in exchange for selecting it for an IT service contract, to the detriment of other more competitive or qualified suppliers. This form of corruption biases competition and distorts business partnerships.

SITUATIONS LIKELY TO PROMOTE ACTS OF CORRUPTION

1. Intermediary partners and consultants must never enter into arrangements for services in order to reward a client for purchasing, prescribing, recommending or using a NUMERYX Technologies product.

2. Intermediary partners and consultants must base all service arrangements on documented and specific business needs and on the skills and experience of the sponsored individuals, and not on an inappropriate consideration, such as past, present or future sales of NUMERYX Technologies products to the sponsored individuals and their employers or affiliated companies.

3. Services must be documented in a contractual agreement that includes, at a minimum, a detailed description of the services to be provided and the fee arrangement.
4. Sales staff, intermediary partners and consultants may suggest other persons, such as subcontractors or consultants, for services based on the subcontractor's or consultant's skills and expertise.

5. However, under no circumstances may sales staff control or inappropriately influence any decision to sponsor or recruit a specific person.

6. Intermediary partners and consultants must not pay more than fair market value for the services. They must use compensation benchmark information from an independent body (if possible) to make their compensation decisions.

7. The arrangement must be legal. In addition, intermediary partners and consultants must hold written proof that the third party's employer was informed of the arrangement before it was put in place. 8. Such arrangements must meet local legal requirements.



Nepotism and favoritism

Favoritism and nepotism consist of favoring friends or family members in recruitment, promotion or contract-awarding decisions, to the detriment of meritocracy. To guard against this type of risk, NUMERYX Technologies makes a point of ensuring total transparency in the selection processes of its partners, its candidates and each economic entity with which it deals or may deal in the future.

EXAMPLE OF A RISK SITUATION: Promoting an employee on the basis of personal relationships rather than competence, or awarding lucrative projects to relatives without objective assessment, are acts of nepotism and favoritism. Promoting a family member to a management position without following the usual selection procedures is also a case that fits this type of situation.



Accounting entries & bookkeeping

Manipulating accounting entries and falsifying bookkeeping consist of recording false financial information to conceal corrupt transactions, such as bribes or illicit payments.

EXAMPLE OF A RISK SITUATION: An example could be an employee concealing bribes or facilitation payments in the accounts in the form of fictitious consulting fees or unjustified purchases.

NUMERYX Technologies applies accounting and financial controls to prevent the fraudulent use of records or accounts for the purposes of corruption or influence peddling. Inaccurate or falsified documents can become incriminating evidence. These controls concern in particular sponsorship, travel expenses, discounts, purchases and partnerships. Each employee must verify the reality of the services or deliveries before approving payment.

EXAMPLE OF A RISK SITUATION: A provider offers an employee to overbill a service by giving back to them the overbilled amount and asking them to intervene in its favor in future calls for tenders. The employee must refuse because this practice constitutes an act of corruption.



Record keeping

Record keeping can be compromised in acts of corruption when information is falsified, concealed or manipulated to hide illegal transactions.

EXAMPLE OF A RISK SITUATION: A case of corruption could involve an employee who modifies or destroys documents related to contracts, financial transactions or audits to conceal fraud or other forms of corruption.

At NUMERYX Technologies, we record all our transactions exhaustively, accurately and in detail so that the reason for and amount of the transaction are clear. In addition to prohibiting bribes, certain anti-bribery and anti-corruption laws require proper record keeping and the establishment and maintenance of internal controls. The purpose of these provisions is to prevent companies from concealing bribes and to prevent fraudulent accounting practices. All NUMERYX Technologies transactions must be recorded exhaustively, accurately and in sufficient detail so that the reason for and amount of any payment are clear. No account or payment may be kept "off the books". NUMERYX Technologies' books and records must never contain false, misleading or fabricated data, whatever the reason.



Sponsorship operations & charitable donations

Sponsorship operations involve donations for social or cultural causes. However, they can mask acts of corruption if they are used to influence a decision or obtain a particular advantage.

EXAMPLE OF A RISK SITUATION: A typical case of corruption could be the payment of funds to a non-profit organization in exchange for political favors or influence over a call for tenders.

Charitable donations can be misused to mask acts of corruption, in particular when a donation is made to a charity with the intention of influencing decisions or obtaining preferential treatment.

EXAMPLE OF A RISK SITUATION: An example would be if an executive or employee of NUMERYX Technologies makes a large donation to an organization supported by a business partner in the hope of obtaining a contract or a specific advantage. This type of donation, although it appears ethical on the surface, is an act of corruption if it is used to influence.

NUMERYX Technologies undertakes not to solicit donations from suppliers or public officials, nor to offer donations to such persons in a way that leads them to believe that such a donation is a necessary condition for the continuation of their business relationship or that giving such a donation is intended to obtain a commercial advantage.

We encourage our directors, officers and employees to devote personal time and resources to charitable organizations and non-profit organizations.

However, unless the solicitation of donations is supported by NUMERYX Technologies, it is strictly prohibited to use NUMERYX Technologies' resources to solicit donations.

Any request on behalf of NUMERYX Technologies for corporate gifts to be offered to charitable organizations and to other non-profit organizations must be authorized in advance by the Chief Risk Officer, one of the in-house legal advisers or a senior executive.

Charitable donations or requests for charitable donations made by individuals in their own name must have no connection with NUMERYX Technologies' activities and must comply with applicable local laws and regulations.

If a public official asks you to make a personal donation to a particular charitable organization, you must obtain the authorization of the ethics referent or a senior executive before agreeing to make the donation.



Fictitious jobs or “consultant” relationships

Fictitious jobs or “consultant” relationships are arrangements in which a company pays an individual for services that are not actually rendered, often to disguise a fraudulent or corrupt transfer of money.

EXAMPLE OF A RISK SITUATION: A manager could hire an external “consultant” who in reality does no work, but receives a salary in exchange for favors or confidential information.



Job, internship or secondment opportunities

Job, internship or secondment opportunities may be offered in exchange for favors, to influence business decisions or to obtain contracts.

EXAMPLE OF A RISK SITUATION: An employee could promise a position or an internship to a relative of a decision-maker at a client company, in exchange for the signing of a contract that is advantageous for the IT services company (ESN).



Supply or service contracts

Supply or service contracts can be awarded fraudulently, often to companies close to decision-makers or in return for bribes.

EXAMPLE OF A RISK SITUATION: A manager could award an IT services contract to an unqualified company in exchange for a payment or other personal benefits.



Social benefits

Social benefits include entitlements such as insurance, pensions, or other privileges, sometimes granted unethically to certain individuals.

EXAMPLE OF A RISK SITUATION: An employee could falsely grant social benefits (such as allowances or bonuses) to persons who are not entitled to them, in exchange for favors.

IV. DEALING WITH AND REPORTING AN ACT OF CORRUPTION

To manage these risk situations and ensure that you adopt the appropriate behavior to deal with them, NUMERYX Technologies provides a set of tools to help you make the best decision.

WHISTLEBLOWING SYSTEM

A whistleblowing system is accessible to all employees, external and occasional collaborators, as well as to suppliers, in order to collect reports. It supplements the regular internal channels for escalating alerts, namely line management, human resources, staff representatives and the ethics officer.

> Conditions for acquiring whistleblower status

To benefit from whistleblower status, several criteria must be met:

- report facts that are contrary to the law, the Ethics Charter or this anti-corruption policy;
- act in a disinterested manner, that is, not out of revenge or for any kind of consideration;
- be in good faith, that is, sincerely and legitimately believe in the truth of the facts being reported;
- have had personal knowledge of the information being reported, that is, not relay rumors or "hallway gossip".

ALERT PROCEDURE

All NUMERYX Technologies employees are required to report immediately any attempted corruption or any suspected attempt at corruption.

- You can report any corruption issue via the alert procedure: https://forms.office.com/r/FBK1TcJwCt
- You can also use the following e-mail address for any report or question: ethique@numeryx.fr
- The NUMERYX Ethics Officer remains at your disposal for any request for advice at l.thomas@numeryx.fr or by telephone at +33 7 64 41 24 33
- All reports will be handled confidentially and will be properly investigated, without fear of retaliation.

> Whistleblower protection

NUMERYX Technologies guarantees strict confidentiality of the identity of the whistleblower, of the person targeted by the alert and of the facts reported.

Reports are handled in strict confidentiality, subject to applicable legal obligations and any administrative or judicial proceedings. No disciplinary or discriminatory measure may be taken against employees who have made a report, even if the facts are not proven, insofar as these employees acted in accordance with the criteria set out above. However, misuse of this system may result in disciplinary sanctions or even legal action.

> How to access the system?

The whistleblowing system is accessible on the Group intranet, via an anonymized alert form.

> Anti-corruption training

Online or in-person training on the anti-corruption policy implemented by NUMERYX Technologies is provided every year and updated annually. Attending this training is mandatory for all NUMERYX Technologies employees. It explores in greater depth the topics covered in this anti-corruption policy, presenting in particular the means to be implemented in order to detect and prevent the risks linked to all the situations described.

> Contact

For any information on this code, please contact the team dedicated to Ethics at the following address: ethique@numeryx.fr No modification or update of this anti-corruption policy may be made without the agreement of the Ethics Officer.



NUMERYX

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