NUMERYX
SMART INNOVATION



Ethics Charter

NUMERYX GROUP

NUMERYX

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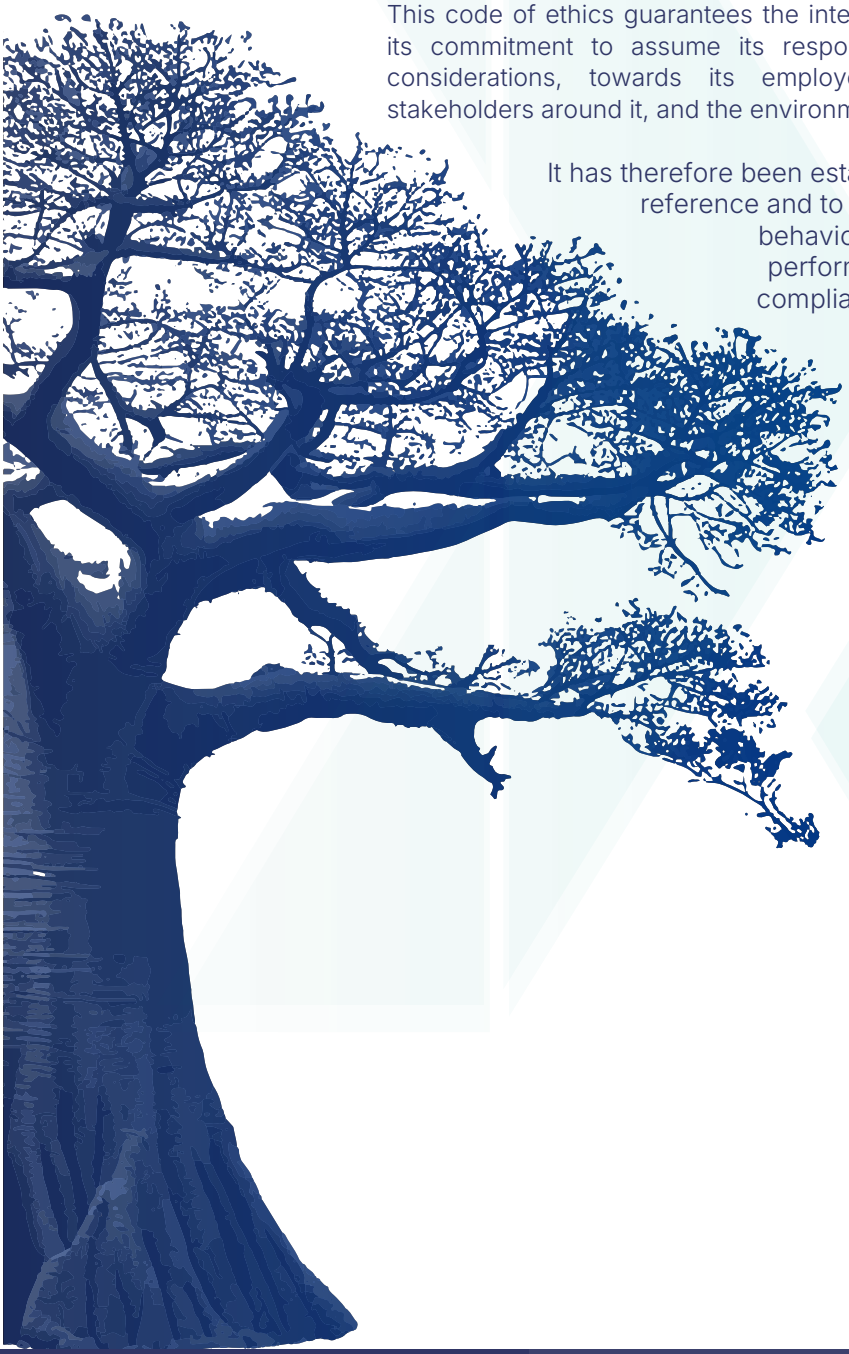
MESSAGE FROM THE CHAIRMAN

As an operator of trusted solutions and services for the digital transformation of businesses, the Numeryx Group operates in markets where reputation, compliance and the reliability of players are essential to endure.

We must all protect and promote the culture of the Numeryx Group and its values, in particular transparency and honesty, in line with our CSR approach.

That is why each of us must commit to irreproachable professional ethics. Individually or collectively, ethics must guide our decisions and our actions.

This code of ethics guarantees the integrity of the Numeryx Group and its commitment to assume its responsibilities, in terms of societal considerations, towards its employees and its customers, the stakeholders around it, and the environment.



It has therefore been established to serve as a common reference and to help us adopt, on a daily basis, behaviour in line with our values in the performance of our duties. Ethics and compliance are the responsibility of us all.

Thank you for your commitment to preserving the DNA of the Numeryx Group and sustaining its success, of which we can all be proud.

Mondher AYADI
Chairman of the Numeryx Group

THE GENERAL RULES OF GOOD CONDUCT

WORKING CONDITIONS AND RESPECT FOR EMPLOYEES' RIGHTS

The Numeryx Group's commitment

The Numeryx Group complies with international labour standards[1], in particular those relating to the protection of workers and the prohibition of forced labour and child labour, in order to guarantee working conditions in which fundamental human rights are necessarily respected. The Numeryx Group therefore prohibits all forced or undeclared work throughout all of its subsidiaries.

It is also committed to improving working conditions and preventing occupational risks, in particular by providing specific training.

The Numeryx Group respects the rights of its employees and protects people's privacy. In addition, active social dialogue is maintained with employee representative bodies, with respect for the independence and pluralism of trade unions.

In practice

The Numeryx Group asks everyone to comply with:

- the internal rules and regulations, their appendices and the rules of conduct,
- the Universal Declaration of Human Rights (available from your HR department),
- the local regulations in force in the course of their professional activities.

More generally, employees are asked to do their best to work together in a pleasant environment, treating people with respect and courtesy.

In the course of their professional activity, they consistently demonstrate neutrality of opinion and respect each person's differences and commitments.

1 ILO Fundamental Conventions No. 29 (forced labour), No. 105 (abolition of forced labour), No. 138 (minimum age) and No. 182 (worst forms of child labour).

HEALTH AND SAFETY AT WORK

The Numeryx Group's commitment

The Numeryx Group strives to fully implement the legal provisions relating to safety and health protection in the workplace. In addition, the Numeryx Group applies an active occupational health and safety prevention policy and ensures that it is consistently applied.

The Numeryx Group asks any subcontractors and suppliers to exercise the same vigilance.

The Numeryx Group maintains a social dialogue on issues relating to health and safety at work.

In practice

Each employee is responsible for:

- Taking note of the safety instructions,
- Keeping their work environment compliant with the safety rules defined in the company,
- Working with respect for everyone.

FIGHTING DISCRIMINATION AND HARASSMENT

The Numeryx Group's commitment

The Numeryx Group's principle is not to discriminate, for any reason whatsoever, in hiring and in working relationships.

Accordingly, the Numeryx Group does not disadvantage any person on the basis of their sex, morals, sexual orientation, age, family situation or pregnancy, genetic characteristics, actual or supposed membership or non-membership of an ethnic group, political opinions, trade union activities, religious beliefs, physical appearance, surname or, except where the occupational physician has found them unfit for work, state of health or disability.

Furthermore, no employee should be subjected to behaviour that could constitute moral or sexual harassment. The Numeryx Group will take all measures to prevent such behaviour.

In practice

The Numeryx Group does not tolerate any form of discrimination or harassment in professional relationships.

Each employee has a duty to behave towards the people they work with in a dignified manner and with full respect for their physical and moral integrity.

RESPECT FOR CUSTOMERS

The Numeryx Group's commitment

The Numeryx Group places customer satisfaction at the heart of its concerns.

To this end, the Numeryx Group strives to deliver irreproachable service quality, in compliance with the regulatory framework, and to continuously deploy quality improvement processes, taking into account the feedback of its customers and the structural and cyclical changes in their markets.

For the Numeryx Group, being responsible in its activities also means offering an innovative range of useful products and services that provide lasting answers to the essential needs of its customers and partners.

In practice

Employees must comply with the procedures applicable to their role, which in particular make it possible to achieve customer satisfaction objectives.

In their dealings with customers, employees act in good faith and show themselves to be loyal and honest.

ENVIRONMENTAL PROTECTION

The Numeryx Group's commitment

The Numeryx Group strives to improve the management policy of its production centres, ensuring that the environmental and social impact of projects is properly taken into account. Respect for the environment is integrated into daily activities in order to reduce energy or paper consumption and to ensure that the waste produced is recycled.

In practice

Employees must pay attention to:

- optimising their electricity consumption by following simple eco-friendly practices (switching off lights and computers, not opening windows when the air conditioning is on...),
- sorting their waste, using the recycling bins provided.

CONFIDENTIALITY AND PERSONAL DATA PROTECTION

The Numeryx Group's commitment

For the Numeryx Group, securing information systems is a strategic priority that guarantees the availability, integrity, confidentiality and traceability of information, while maintaining the trust of its customers and partners.

That is why the Numeryx Group is committed to an uncompromising analysis of risks, through a preventive approach to business processes and a policy of confidentiality and security for the data entrusted to it.

An information system security policy is deployed across the entire Group.

The Numeryx Group pays particular attention to compliance with legal provisions on the automated processing of personal data.

Likewise, the Numeryx Group ensures respect for the intellectual property of others and prohibits any unlawful reproduction.

In practice

Each employee is contractually bound by a duty of confidentiality. In addition, information belonging to the Numeryx Group or its customers may be sensitive, or even covered by professional secrecy.

All staff are therefore obliged not to disclose confidential professional information to which they have access to third parties or to Numeryx Group employees who are not authorised to know it.

In the same way, employees are prohibited from using for personal purposes, directly or indirectly, any privileged information that they may hold in the course of their duties.

Each employee must comply with the security rules relating to the handling of information, in particular the IT charter.

In accordance with the regulations, each employee has an individual right of access to and rectification of the data held in the processing operations that concern them. This data may be consulted on request from the recipients of the information. Each employee also has the right to object, on legitimate grounds, to personal data concerning them being subject to the processing in question.

All media requests for information must be addressed to the Marketing and Communication Department.

TRANSPARENCY OF INFORMATION

The Numeryx Group's commitment

The Numeryx Group's principle is loyalty towards its customers and suppliers, in order to establish and maintain lasting relationships of trust.

The shareholders and partners of the Numeryx Group, as well as public authorities, rely on the precision and accuracy of the information contained in our documents. In particular, the Numeryx Group reflects its operations in its accounts with fidelity, transparency and completeness.

In practice

Employees must ensure that the information communicated in the course of their duties is accurate, timely, complete, correct and understandable.

Each employee undertakes in particular not to falsify documents or data with the aim of misleading readers or concealing unlawful activity. Compliance with the applicable internal control procedures is essential, particularly for the preparation of financial documents.

INSIDER TRADING

The Numeryx Group's commitment

Insider trading consists of disclosing information that is not publicly known and that, if it were, would have a positive or negative impact on the value of listed securities.

In practice

Employees must not disclose or use the privileged information to which they have access in the performance of their duties, whether it concerns the Numeryx Group or a company with which they are in contact, directly or indirectly, to carry out, recommend or advise against stock market transactions for their own account or that of others.

FAIR COMPETITION

The Numeryx Group's commitment

The Numeryx Group is committed to acting in strict compliance with the competition rules and laws applicable in the countries where it operates.

In practice

It is therefore prohibited to enter into agreements or to engage in conduct likely to restrict or distort free competition.

The exchange or communication of commercially sensitive information concerning competitors, customers or suppliers may also constitute a breach of competition rules and of the duties of loyalty and confidentiality to which all employees are subject.

CONFLICTS OF INTEREST

The Numeryx Group's commitment

Each employee must avoid having their personal interests, direct or indirect, conflict with those of the Group.

The Numeryx Group makes every effort to prevent such situations from arising, in particular by:

- regularly analysing the risk factors to which the company is exposed,
- raising employee awareness of this risk,
- applying control procedures.

In practice

Employees must avoid any situation in which their personal interests, or those of their relatives, would risk or appear to influence the impartial and objective performance of their duties.

Situations of this kind are numerous and varied in nature.

In accordance with their duty of loyalty, employees refrain from competing with the activities of the Numeryx Group.

FIGHTING CORRUPTION

The Numeryx Group's commitment

The Numeryx Group opposes all forms of corruption in its relations with commercial and institutional partners.

The expense policy defines the rules and limits regarding gifts in business relationships.

In practice

Business meals, invitations and modest gifts of a symbolic nature may be offered or accepted as part of normal business practice and in compliance with the codes of conduct of customers, suppliers or any other partner. They are signs of courtesy and appreciation. Nevertheless, these gestures must be legitimate and must not be intended to influence a business decision.

Employees must not solicit, receive or offer a gift, a facilitation payment or a kickback in order to obtain or retain a contract or an undue advantage.

Staff are regularly made aware of these topics and trained on them.

POLITICAL NEUTRALITY

The Numeryx Group's commitment

The Numeryx Group does not associate itself with any political party and does not contribute to their funding.

In practice

Any employee taking part in a political activity must do so outside working hours, without claiming membership of the Numeryx Group and without using company resources (telephone, e-mail, letterhead...).

PHILANTHROPY

The Numeryx Group's commitment

Philanthropy or payments to organisations, whether charitable or otherwise, must be consistent with the Numeryx Group's policy and strictly within the limits of the regulations.

In practice

Any employee taking part in a political activity must do so outside working hours, without claiming membership of the Numeryx Group and without using company resources (telephone, e-mail, letterhead...).



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