

**EXTERNAL DOCUMENT**

# **BUSINESS CODE OF CONDUCT**

**NOVEMBER 2025**

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# 1. Message from management

The Group's Board of Directors and Executive Management are convinced that Econocom's success depends on everyone's conduct respecting the key values of "good faith, boldness and responsiveness".

As a major partner in digital transformation, our Group is committed to long-term relationships with its customers and employees. Our approach as a responsible employer provides a working environment that respects everyone and enables our employees to fully express their values of integrity and responsibility.

We have designed this Code of Conduct as a guide for our actions and decisions. It is also a formal request to all our partners to adopt an equivalent approach.

This Code of Conduct is accompanied by a set of internal measures to ensure consistency. These operational guidelines mainly concern, but are not limited to, combatting corruption, fraud and conflicts of interest. Everyone must read this document to ensure that it is observed and effectively implemented.

Our commitment to transparency and exemplary conduct is backed up by a whistleblowing system, which we preferred to be external, to protect whistleblowers and ensure that whistleblowing reports are handled reliably.

The Group Ethics Committee, which oversees the distribution of this Code of Conduct, is available to answer any questions you may have.

We trust each and every one of our employees to fully apply these values and principles. It is through exemplary conduct that we will achieve excellence.



**Jean-Louis Bouchard**

Chairman

**econocom**  
LIVE TECH

## 2. Guidelines for conduct

Acting with excellence means respecting a set of rules. This document defines acceptable and unacceptable conduct. Compliance with these rules is essential to be consistent with the Group's values and maintain high ethical standards. The " 100 Introduction (for ethics procedures and policies) V2 " document provides details concerning the Code of Conduct and related policies and procedures (context, purpose, scope, review and update, roles and responsibilities).

These rules are divided into six objectives:

THEMES	RULES OF CONDUCT
INTERESTS OF CUSTOMERS	<ul style="list-style-type: none"> <li>+ Understanding customer needs;</li> <li>+ Communicating transparently during sales campaigns;</li> </ul>
INTEGRITY	<ul style="list-style-type: none"> <li>+ Managing risks of conflicts of interest;</li> <li>+ Complying with market abuse rules;</li> </ul>
COMMITMENT IN SOCIETY	<ul style="list-style-type: none"> <li>+ Combating money laundering and the financing of terrorism;</li> <li>+ Promoting respect for human rights;</li> <li>+ Protecting the environment;</li> </ul>
PROFESSIONAL ETHICS	<ul style="list-style-type: none"> <li>+ Never using insider information for personal transactions;</li> <li>+ Not being in a conflict-of-interest situation in the scope of external activities;</li> <li>+ Combatting corruption;</li> </ul>
RESPECT FOR COLLEAGUES	<ul style="list-style-type: none"> <li>+ Applying the highest standards of professional conduct;</li> <li>+ Rejecting all forms of discrimination;</li> <li>+ Ensuring safety in the workplace;</li> </ul>

## PROTECTION OF ECONOCOM

- + Creating and preserving the ECONOCOM Group's long-term value
- + Protecting the Group's information;
- + Communicating responsibly;
- + Acting ethically towards external stakeholders;
- + Taking responsible risks.

### 3. Expected relations with agents

An agent is a person who is permanently and independently responsible for negotiating and potentially entering into contracts of sale, purchase, rental or provision of services, in the name and on behalf of Econocom.

Employees are responsible for ensuring that they work with third parties that have the same standards of probity as Econocom Group. The recruitment and monitoring of sales agents must comply with the internal rules in force within Econocom Group. In this respect, using an agent must not result in circumventing this Code of Conduct. It is essential to make sure internally that each agent signs an agent contract under which he/she undertakes to comply with the Code of Conduct.

### 4. Expected relations with public authorities, customers and partners

To ensure the integrity of its business relationships and protect its employees against the risks of corruption, influence peddling and fraud, the Group requires its employees and agents to comply with the principles set out in this chapter. The Group has implemented a "106 Fairness in business dealings" procedure.

#### 4.1 Relations with public authorities

Business operations carried on by Econocom Group entities may result in some of their employees and agents coming into contact with public officials and authorities, in the scope of public contracts and administrative acts for the running of the Group's operations.

The utmost vigilance must be observed in relations with public officials and similar persons.

Econocom Group ensures that laws and regulations on the prevention of corruption of public officials are observed.

## 4.2 Customer relations

Commercial transactions with public and private customers must always and under all circumstances comply with applicable law, respect the principles of independence and objectivity, and be conducted transparently and in the scope of fair competition.

Employees and agents must be extremely vigilant in their business dealings with customers.

## 4.3 Relations with suppliers and partners

### 4.3.1 Definitions

A partner is any person, group, body, organisation or entity with which the Group associates or joins forces to carry out joint action in a business, undertaking, negotiation or project.

A supplier is any person, group, body, organisation or entity from whom the Group purchases goods and services of any kind required for its operations.

In the next part of this section, business partners and suppliers in a business relationship with Econocom Group will be referred to as "partners".

### 4.3.2 Contractual precautions

We expect our partners to work with integrity and in compliance with anti-corruption and anti-fraud laws and regulations in force in their countries. It is essential that our partners share and apply the Group's principles and rules on combatting corruption and fraud.

In addition, in a spirit of shared responsibility, employees and agents must be extremely vigilant during the three key stages of the relationship with partners in order to:

- During the selection stage: select our suppliers and subcontractors based on objective criteria (quality, price, compliance with deadlines, no conflicts of interest, social aspects and respect for the environment), apply competitive processes and comply with the Responsible Purchasing Policy;
- During the contract formation stage: formalise and enter into purchase and supply contracts and the associated commercial transactions (take and receive orders, check invoices, pay invoices, any disputes);
- During the contract performance stage: pay for the products and services which they have actually delivered within the contractual framework previously defined with them.

### 4.3.3 Intermediaries

An intermediary is a person who or company which puts a seller and a purchaser into contact in return for a fee (e.g. broker, business introducer, etc.). This definition covers all categories of intermediaries with the exception of agents.

We expect staff and agents to be particularly vigilant when using intermediaries. The involvement of a third party in a transaction can sometimes conceal an undue benefit (for example, in the form of commission hidden by over-invoicing or slush funds used to pay bribes), particularly in international business to obtain procurement contracts.

Payments made to intermediaries may conceal a purpose that falls under indirect corruption, aimed at influencing or rewarding preferential treatment or misuse of a function or activity.

The Group prohibits such practices. They seriously damage the Group's reputation and give rise to criminal liability. If in doubt, all employees should inform their manager or the Ethics Committee.

## 5. Main risk situations

To gain a better understanding of the ethical risks specific to Econocom Group's business lines and their operating environment, a risk mapping exercise has identified conduct to be avoided and acted as a reference for this Code of Conduct. Mapping can also be used to identify employee profiles most exposed to risk. This mapping is reviewed and updated regularly to keep pace with changes in the Group's environment.

### 5.1 Corruption and influence peddling

#### 5.1.1 Definitions

"Corruption" is the act of promising, giving or offering (active corruption) to a third party, and also the act of soliciting or receiving (passive corruption) from a third party, directly or through the intermediary of another person, an undue benefit (offers, promises, gifts or presents, favours or particular benefits, etc.), for oneself or for another person, in order to facilitate, carry out or refrain from carrying out an act.

"Influence peddling" is when a person uses his/her real or perceived position or influence to influence a decision to be taken by a third party. It involves three players: the beneficiary (the person who provides benefits or gifts), the intermediary (the person who uses the credit he/she has due to his/her position) and the target person who holds the decision-making power (public administration or authority, magistrate, expert, etc). Criminal law distinguishes between active influence peddling (by the beneficiary) and passive influence peddling (by the intermediary). The two offences are autonomous and are punishable in the same way, with penalties ranging from fines to prison sentences and closure of business operations.

In cases of corruption or influence peddling, the real or supposed value of the benefit is irrelevant.



### 5.1.2 Group's position

The Group formally prohibits any use of corruption or influence peddling in its business practices. Any employee who encounters this type of situation is asked to contact their manager or the Ethics Committee.

## 5.2 Gifts and invitations

### 5.2.1 Definition

While customary courtesies and hospitality, as well as symbolic gifts, form part of business relationships, there are limits to be observed. Such acts may influence, or be perceived as likely to influence, the judgement of the person receiving them, constituting a risk of corruption or conflict of interest. The person offering or receiving such gifts and invitations incurs civil and sometimes criminal liability and harms the Group's reputation.

### 5.2.2 Gift policy

Without strictly prohibiting offering or accepting gifts or invitations aimed at maintaining professional relationships or promoting the image of Econocom Group, it is reminded that they must be reasonable, measured and offered in good faith.

Econocom Group requires its employees and agents to be transparent about receiving or offering any gifts and invitations in compliance with the "101 Gift and Invitations (03.2025)\_EN" procedure.

Invitations to entertainment or leisure activities (e.g. concerts or sporting events) must be part of a meeting, get-together or event aimed at developing better business relations. They must remain exceptional, be authorised by local law and comply with internal procedures. In all cases of invitations, the presence of an Econocom employee or agent is required.

Invitations to trips and seminars must be in a professional framework.

## 5.3 Corporate philanthropy and sponsorship

### 5.3.1 Definitions

"Corporate philanthropy" and "sponsorship" consist of support (financial, in kind, material or skills) for an organisation, person or event. Sponsorship differs from corporate philanthropy in that support is provided in return for a direct benefit (e.g. advertising panels bearing the sponsor's name are installed in line with the television cameras), which is not the case in a corporate philanthropy initiative.

### 5.3.2 Corporate philanthropy and sponsorship policy

Econocom Group is a key player in the local communities in which it operates. Within this framework, the Group may decide to make occasional donations, for example to charities for educational, cultural or social purposes. Some of these initiatives may fall within the legal and tax framework of corporate philanthropy. These initiatives demonstrate the involvement of Group entities in civil society and form part of our corporate social responsibility policy. In some circumstances, entities may also sponsor events or activities organised by third parties in return for the opportunity to give the brand commercial visibility. These sponsorship initiatives form part of the Group's marketing and image promotion strategy.

The Group has implemented a "102 Corporate philanthropy & sponsorship" procedure.

The Group therefore requires its employees and agents to pass on every corporate philanthropy proposal to the Corporate Social Responsibility (CSR) Department, which will ensure that it is consistent with the Group's social commitments. A member of the Executive Committee will then be responsible for giving final approval, who will decide whether or not to approve the initiative.

Econocom Group insists that each employee and agent must be vigilant with regard to corporate philanthropy initiatives and stipulates that no corporate philanthropy initiative may be supported by Econocom if it offers a personal and individual benefit to a customer's representative. Only initiatives taken by the customer company in its own name may be submitted to the CSR Department and a member of the Executive Committee for assessment.

## 5.4 Facilitation payments

### 5.4.1 Definition

A "facilitation payment" is an unofficial payment of small amounts to facilitate or ensure that a routine act or service, to which the payor is already entitled (by law or in any other respect), is effectively or more quickly carried out. It differs from a "bribe" since the consideration is not an undue benefit but involves speeding up or facilitating a transaction (e.g. payment of small amount of commission to shorten the time taken to validate a visa or clear customs).

### 5.4.2 Facilitation policy

While facilitation payments may seem necessary to carry out an operation or form part of a country's culture, they remain a corrupt practice. They hinder the economic and social development of the country where the facilitation payment is made. The person making a facilitation payment also incurs civil and even criminal liability and harms the reputation of Econocom Group.

Econocom Group prohibits use of facilitation payments by its employees, agents, business partners or by a third party acting on its behalf, regardless of the reasons and amounts, and even if they are authorised by local law.

## 5.5 Fraud

### 5.5.1 Definition

Fraud involves intentionally deceiving others in order to obtain an illegitimate benefit or to circumvent legal obligations or rules specific to Econocom Group or an external organisation.

**Fraud can consequently be:**

- An action or omission;
- Internal (committed by an employee: e.g. misappropriation of funds, such as a business credit card, data theft, false declarations) or external committed by a third party (e.g. misappropriation of funds, data theft, false declarations).

It implies intentional behaviour (it is not a mistake) and concealment of the unlawful act.

Any person liable for an act of fraud against Econocom Group may be prosecuted before the competent courts. The same shall apply to any employee or person belonging to Econocom Group or acting on its behalf who is guilty of fraud to the detriment of a partner or customer.

### 5.5.2 Fraud policy

In addition to the perpetrator incurring liability, these offences undermine Econocom Group's probity and weaken its business relationships.

Econocom Group refuses any fraudulent operation, regardless of the context, established customs or potential benefits that the Group may receive. Anyone who witnesses fraud must inform their manager or the Ethics Committee immediately.

## 5.6 Conflicts of interest and employment of close friends and relatives

### 5.6.1 Conflicts of interest

#### 5.6.1.1 Definition

A conflict of interest exists when the personal interests of an employee or agent may conflict with Econocom Group's interests.

A conflict of interest is any situation of interference in which the personal interests of an employee are likely to influence or appear to influence the independent, impartial and objective performance of his/her duties, thereby coming into conflict with Econocom Group's interests. Employees in a conflict-of-interest situation may find their objectivity, impartiality and even their decisions called into question as a result of this situation of interference, and may consequently find themselves weakened in the performance of their professional duties.

A personal interest may be emotional, family-related, financial, associative, cultural, sporting, political, charitable, religious, trade union or philosophical.

There are several forms of conflicts of interest:

- A **proven** conflict of interest: the employee or agent has a private interest that may affect his/her professional obligations;
- **Apparent** conflict of interest: the employee or agent appears to be in a situation where private interests may influence his/her professional obligations, but this remains to be verified by an investigation; and
- **Potential** conflict of interest: there is not yet a real conflict because there is no direct link between the personal interests of the employee or agent and his/her position. A change to his/her position may place him/her in a conflict of interest situation.

#### 5.6.1.2 Risk situations

Conflicts of interest can take so many different forms that it is impossible to draw up an exhaustive list. The main risk situations identified are as follows:

- 1) Holding a corporate mandate or accepting an appointment<sup>1</sup> for political office at a local or national level;
  - a) a position as director, senior executive, executive or similar position in an external company;

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<sup>1</sup> The risk of a conflict of interest is heightened if, as a result of this corporate mandate or appointment, the person concerned may be required to take part in decisions directly affecting the Group's interests in the area or scope where he/she is elected.

- b) on the Board of a professional or trade association;
- 2) Be in a position to influence the recruitment, career or remuneration of a close friend or relative<sup>2</sup> internally or in a partner of the Group.  
*The rules governing the employment of close relations are set out in the "105.1 Employing friends of family members" procedure. "105.1 Employing friends of family members".*
- 3) Having a close personal relationship with a person associated with a supplier, customer, subcontractor, competitor, target company of the Group or potential purchaser of an entity that the Group is considering selling, in particular when the position held enables the person to have an influence on the relationship;
- 4) Holding a direct or indirect financial interest in a supplier, customer, subcontractor, competitor, target company of the Group or potential purchaser of an entity that the Group is considering selling, in particular when the position held enables the person to take the decision to commit Econocom with regard to the third party or have an influence on this decision;
- 5) Accepting any benefit, gratuity or service, for oneself or a close friend or relative, from a competitor or business partner of the Group (with the exception of modest gifts and hospitality<sup>3</sup>).

### 5.6.1.3 Conflicts of Interest Policy

Econocom Group has implemented a "105 Conflicts of interest" procedure.

Econocom Group requires all of its partners and employees to declare any outside interests to the Group, and report any conflict of interest to the Group promptly. In addition, the Group's senior executives and directors are subject to special monitoring.

Any undeclared conflict of interest situation, which is discovered by the Group, may be subject to internal sanctions and may result in the Group taking legal action before the competent courts.

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<sup>2</sup> A "close relationship" or "friend or relative" includes: the employee's spouse or partner, parents, brothers and sisters, children and their spouses, brothers-in-law and sisters-in-law, parents-in-law, nephews and nieces, uncles and aunts, grandparents, grandchildren or any other close relative, including romantic relationships and/or close friends.

<sup>3</sup> In compliance with the "101 Gift and Invitations (03.2025) \_EN" procedure

## 5.6.2 Specific category of conflict of interest: employment of close friends or relatives

### 5.6.2.1 Definition

The principles to be observed with regard to the employment of close friends and relatives apply to the recruitment process of a person who has a close relationship with an Econocom Group employee, but also when two Econocom Group employees are close friends or relatives, for example in the case of a hierarchical relationship between persons who have a close relationship.

A "**close relationship**" or "**friend or relative**" includes: the employee's spouse or partner, parents, brothers and sisters, children and their spouses, brothers-in-law and sisters-in-law, parents-in-law, nephews and nieces, uncles and aunts, grandparents, grandchildren or any other close relative, including romantic relationships and/or close friends.

### 5.6.2.2 Policy on employment of close friends and relatives

Econocom Group has implemented a "105.1 Employing friends of family members" procedure.

Econocom Group employees can recommend close friends and relatives for employment. However, in order to respect the principles of fairness and equal opportunities in employment and career management, the Group has defined key principles to be observed with regard to the employment of close friends and family. These principles encourage greater transparency and aim to limit actual or potential conflicts of interest arising from this situation.

The Human Resources Department is responsible for implementing all measures to ensure compliance with the principles set out in the above procedure.

## 5.7 Third party probity assessment

As part of its ethical approach, French entities in Econocom Group assess the probity of their third parties (customers, suppliers, intermediaries, etc.), in compliance with the "107 Third Party Probity Assessment" procedure.

The purpose of these checks is to identify and control the potential ethical risks associated with third parties with which French entities in Econocom Group maintain business relationships or envisage collaborating.

The objectives of this approach are as follows:

- Assessing the risk of corruption and influence peddling to which French entities in Econocom Group are exposed by entering into or continuing a relationship with a third party;
- At the end of the assessment, being in a position to decide:
  - To approve/validate the start of the commercial relationship - if necessary by placing the third party under surveillance;
  - To terminate it or not to commit to it.
- If the assessment identifies risk factors, the level of vigilance may be adapted, where appropriate, by implementing additional preventive or control measures or by sending out appropriate questionnaires (additional questions depending on the context). These measures may involve introducing a reinforced anti-bribery clause in contracts with the third party, requiring the third party to check the probity of its subcontractors in the scope of the contract, requiring the third party to include an anti-bribery clause in contracts entered into with each of its own agents, suppliers, subcontractors or partners in the scope of the contract, etc.

The approach is based on risk. Therefore:

- Checks are focused on categories of third parties identified as being at risk, in particular with regard to the mapping of corruption and influence peddling risks;
- The higher the risk identified, the more in-depth checks will need to be carried out.

## 5.8 Anti-corruption checks in the scope of mergers and acquisitions

### 5.8.1 Definitions

Mergers and acquisitions are complex operations that may involve significant financial, legal, reputational and operational risks.

**Acquisition:** operation by which a company becomes an entity of Econocom Group in the event of acquisition of majority control.

**Merger or takeover:** operation by which a company transfers its assets and liabilities to an existing company or a new company formed in the scope of the operation.

### 5.8.2 Policy on Mergers and Acquisitions

Econocom Group has implemented a "108 Anticorruption checks as part of M&A" procedure.

This procedure covers the anti-corruption checks carried out by Econocom Group prior to these operations in order to:

- Refine your knowledge of target companies and assess them as accurately as possible,
- Measure the risks involved before an operation is concluded.

Actions relating to integrating target companies into the Group's anti-corruption system are also discussed.

The results of these anti-corruption checks form an integral part of the due diligence and decision-making process.

## 6. Combating money laundering

### 6.1 Definition

Money laundering involves hiding the origin of money obtained from illegal activities by reinjecting it into legal activities. The term money laundering originates from the fact that money obtained illegally is referred to as dirty money. Money laundering involves making illegally obtained money "clean", i.e. reinjecting "dirty" money into a legitimate business.

Governments around the world have now set up numerous organisations to combat money laundering on a global scale.



## 6.2 Group's position

Econocom Group prohibits and condemns all forms of money laundering. In addition, the Group undertakes to prosecute the perpetrator of any acts that it witnesses.

# 7. Data confidentiality

## 7.1 Background

Doing business involves receiving and sending information, some of which may be important or strategic, both for the interests of Econocom Group and those of its customers and suppliers. Econocom Group pays the utmost attention to the processing of such oral, written or digital information.

## 7.2 Group's policy

Econocom Group implements and maintains advanced technical solutions to guarantee the confidentiality, security and integrity of the data it processes. The Group provides its employees with regular training on these subjects, and implements technical and operational measures to ensure compliance with the General Data Protection Regulation (GDPR).

Econocom Group expects the same high standards from its partners. This duty of confidentiality is expected of any business relationship with Econocom Group, as a customer, supplier or intermediary.

# 8. Financial market integrity

## 8.1 Definitions

Insider dealing occurs when a person in possession of inside information knowingly makes use of it by carrying out, either directly or indirectly, one or more transactions for him/herself or for another person, or by cancelling or amending one or more orders placed on the issuer or the financial instrument concerned by the inside information.

The offence of price manipulation is committed when a transaction is carried out, an order is placed or conduct is engaged in which gives, or is likely to give, misleading indications regarding the supply, demand or price of a financial instrument or which results in the price of such instrument being set at an artificial level.

## 8.2 Group's policy

Econocom Group is traded on Brussels Stock Exchange (Euronext). Therefore, Econocom Group has a number of obligations and duties to observe when processing and using its financial information.

The Group has implemented a "103 Financial market integrity" policy.

Econocom Group strongly condemns insider dealing and price manipulation, and may take legal action against the perpetrator of such practices, which it may witness or be a victim of. Group employees who are permanent insiders<sup>4</sup> or occasional insiders<sup>5</sup> are subject to special monitoring and, in this case, are notified regarding periods during which they are prohibited from dealing in any financial instruments linked to the Group.

Each employee concerned is responsible for checking whether or not he/she is in an "insider" situation, prohibiting him/her from carrying out stock market transactions involving the Group's securities. The Group has implemented an internal procedure for dealing with such situations. This responsibility also applies to employees who hold insider information concerning the Group's customers or suppliers.

## 9. Combating discrimination

Econocom Group is an employer that respects its employees and aims to encourage the most deserving to succeed and give everyone a fair chance. Its CSR policy and HR policy are practical ways of organising this commitment.

Econocom Group does not tolerate any discrimination on the grounds of race, gender, age, health, religion, sexual orientation or political, religious or trade union opinions.

Econocom Group acts in the scope of its business, as in all circumstances, by respecting these principles of non-discrimination at all times.

Any employee, customer, supplier or partner of Econocom Group, who considers that this commitment is not being respected, can contact the whistleblowing platform accessible on the Group's website (see the whistleblowing section), or contact the Ethics Committee.

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<sup>4</sup> **Permanent insiders:** persons who, given the nature of their duties or position, have permanent access to all privileged information concerning Econocom Group (e.g. members of the Board of Directors, Managing Directors, Group CFO, etc.).

<sup>5</sup> **Occasional insiders:** any person, other than permanent insiders, who has occasional access to inside information concerning Econocom Group and who works for Econocom Group under an employment contract or otherwise performs tasks that give him/her access to inside information, such as advisers, accountants or credit rating agencies (whether or not they are bound by a confidentiality obligation).

## 10. Respect for the environment

Digital technology has a considerable impact on the environment. The environmental footprint of digital technology is growing and represents a real challenge for Econocom Group, which pays considerable attention to controlling the impact of its operations.

Econocom Group has been pursuing a demanding environmental policy for several years based on optimising the energy consumption of its buildings and infrastructure, controlling consumption and processing and reusing equipment.

In particular, the Group has implemented various best practices in the area of digital responsibility, which have enabled it to better control the carbon footprint associated with its operations and achieve a significant reduction in its CO2 emissions. For example, energy consumption linked to infrastructure equipment fell by 40% in 2018, following the closure of a data centre.

In addition, Econocom Group has chosen to favour reusing all of its products in order to limit the environmental impact of disposal and destruction. This approach encourages the use of the social and solidarity-based economy and promotes the recycling of the equipment concerned in compliance with regulations. In the scope of its sustainable development policy, Econocom has called on ATF Gaia, an adapted company and subsidiary of ATF Group, and Ateliers Sans Frontières, a member of ARES Group, to improve the reuse and reconditioning of its waste electrical and electronic equipment (WEEE).

## 11. Combating (moral and sexual) harassment

Econocom Group prohibits any conduct, remarks, acts, gestures or written materials that may undermine the personality, dignity or physical or psychological integrity of any person, whether a Group employee or not, thereby jeopardising their personal or professional balance.

Econocom Group reiterates that it undertakes to prosecute any perpetrator of incidents of this nature of which it may become aware.

Any employee, agent, customer, supplier or partner of Econocom Group, who considers him/herself to be the victim of such a situation may:

- Contact his/her line manager, his/her HR contact or the Legal Department in charge of Compliance, the Group Compliance Officer or the Ethics Committee (via the e-mail address [ethical.committee@econocom.com](mailto:ethical.committee@econocom.com)).
- Report incidents via the whistleblowing system accessible on the Group's website (see the "Whistleblowing System" section) and available via the following link: <https://report.whistleb.com/fr/econocom>.

## 12 Use of Group resources

Econocom Group makes premises, computer and telephone equipment available to employees, which must be used for their professional purposes. Econocom Group tolerates their proportionate and justified use for personal purposes (e.g. use of professional e-mail, mobile phone, etc.).

However, these resources may only be used within the legal framework and in compliance with the Group's values. All purposes aimed at consulting, sending or storing information of a pornographic, insulting, discriminatory or criminal nature, or any form of apology relating to these categories, in addition to any use of games, and more generally, any use that may cause or exploit harm to a third party, are consequently prohibited.

## 13 Econocom Group whistleblowing system

The Group has implemented a "104 Ethical Whistleblowing System" procedure and a "104.1 Procedure for Investigating and Handling Breaches".

The internal whistleblowing system is based on Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law, Act no. 2016-1691 of 9 December 2016 on transparency, combatting corruption and modernising economic life, referred to as "Sapin II Act", amended by Act no. 2022-401 of 21 March 2022 aimed at improving the protection of whistleblowers and Decree no. 2022-1284 of 3 October 2022 and Act no. 2017-399 of 27 March 2017 on the duty of care of parent companies and ordering companies (1).

The whistleblowing system implemented by Econocom Group is available to all employees, whether casual or permanent, all persons acting in the name of or on behalf of Econocom Group, regardless their status or position in the organisation (corporate officers, agents, etc.), and all of its external stakeholders (service providers, partners, suppliers, subcontractors, etc.).

Whistleblowing reports must be notified to the Ethics Committee via the secure external platform which the Group has set up (Whistleblowing system). This platform is available at the following link <https://report.whistleb.com/fr/econocom>. It is hosted and managed by an external service provider which specialises in whistleblowing report handling and is subject to strict confidentiality and security obligations. A whistleblowing report can also be sent by e-mail or orally in compliance with the above procedure.

The whistleblowing report may also be sent to the following contact persons, except if it relates to the perpetrator of the offending conduct:

- his/her direct or indirect line manager,
- where appropriate, his/her HR contact person,
- the Group Compliance Officer,
- the Group Legal Director,
- the Group Ethics Committee.

Whistleblowing is based on the principle of shared responsibility and reinforcing everyone's vigilance in the face of risk. It is optional.

The legal protection of whistleblowers applies to any person who files a whistleblowing report, even if the incidents reported prove to be unfounded, provided that the person is eligible for whistleblower status in compliance with the "104 Ethical Whistleblowing System" procedure.

However, misuse of the whistleblowing system or use of the system in bad faith exposes the whistleblower to disciplinary sanctions and legal action.

## 14 Penalties for breaches of the Code of Conduct

In the event of a breach of this Code of Conduct by employees, disciplinary sanctions (warning, reprimand, dismissal, etc.), as defined by law or the Internal Company Rules, will be applied. Furthermore, Econocom Group will sanction any agent who breaches this Code of Conduct without prejudice to its right to take legal action against the perpetrators of such breaches before the competent courts.

In the event of a breach of the principles of this Code of Conduct by Econocom Group partners, customers, suppliers, intermediaries or others, the business relationship will be suspended as a precautionary measure and then submitted for assessment to the Ethics Committee, which will decide whether to maintain or terminate the relationship, without prejudice to its right to take legal action against the perpetrators of such breaches before the competent courts.

Any breach must be reported to the Ethics Committee. After investigation by the Ethics Committee, Group management will use its discretion to select the most appropriate sanction depending on the seriousness of the breach.

It is understood that the Group will not tolerate any breach of this Code of Conduct.