

CODE OF ETHICS

This Prodware Group's Code of Ethics forms the basis of the common rules that must guide all the Group's employees and partners in the day-to-day exercise of their profession.

It formalises our Group's commitment to conducting its business in compliance with applicable regulations and our values, and defines the behaviour expected of the Group's employees and partners. It is supplemented by the Middledenext Anti-Corruption Code of Conduct to which the Group has subscribed.

It is up to everyone, whatever their position, the nature of their contract or the country in which they carry out their duties, to take ownership of all the rules laid down. Everyone is the guarantor of the Group's ethical policy

This Code of Ethics is shared with our business partners and co-contractors (including suppliers, customers, intermediaries, service providers and sub-contractors) so that they are aware of our vision and commitments and can implement them in their activities in relation to the Group.

All managers of the Group's legal entities are responsible for ensuring that the Code is disseminated, understood and applied by all members of the Group's staff. New employees must familiarise themselves with the Code when they are recruited.

All the principles of the Code of Ethics are also available on the Intranet in English and French and on the Group's corporate website at the following address:
<https://www.prodwaregroup.com/investisseurs/en/ethics/>

If employees have any questions about a particular situation and/or the content of the Code, they are invited to refer to **section 6** of this document.

OUR PRINCIPLES OF CONDUCT

1. ACTING WITH INTEGRITY

1.1. Complying with the law

The Group undertakes to comply with the laws and regulations in force in the countries in which it operates. Any activity that could lead the Group to engage in illegal practices is prohibited.

In particular, the Group undertakes to comply with :

- The 10 principles of the United Nations Global Compact ;
- The Universal Declaration of Human Rights,
- The fundamental conventions of the International Labour Organisation

In case of doubt, it is up to each employee to ask his or her line manager for information and to seek the advice of the relevant departments where necessary.

1.2. Respecting the competition

The Group complies with competition law, which aims to guarantee healthy and fair competition between economic players in its sector and to prevent, and even punish, any practice that distorts or hinders this competition.

In particular, no unlawful agreement with competitors will be entered into, either directly or indirectly, in order to fix prices and conditions of sale, share out areas of operation, or treat customers or suppliers in a discriminatory manner (non-exhaustive list).

It is also forbidden to disparage competitors, their employees or their products.

It is the responsibility of each member of the Group to respect its rules and to adopt ethical and responsible behaviour. In particular, they must pay close attention to written or oral exchanges with competitors, including in the context of events unrelated to a particular contract or prospect.

If a partner acts in a way that is contrary to these principles, the employee must immediately inform his or her line manager for advice.

1.3. Preventing corruption and conflicts of interest

The Group firmly condemns all forms of corruption, whatever the cause or method, in the countries in which it operates.

By way of example, the Group and its employees refrain from:

- Offering, promising or giving any advantage or payment with a view to influencing a decision in favour of the Group, in particular to a public official, a politically exposed person, a trade union, a political party, etc. ;

- Accepting or requesting money or any other monetary equivalent that is not justified and documented;
- To depart, with regard to gifts, business meals or invitations, from the provisions of the gift policy in force within the Group and from the provisions applicable in the country in which they carry out their activity,
- Making a facilitation payment (unofficial payment) to carry out or speed up certain administrative formalities, particularly in countries where the risk of corruption is high;
- Using a third party to carry out a transaction that is not legal.

Each employee must understand and apply the Group's anti-corruption rules and procedures and follow the associated training courses.

The anti-corruption code of conduct is available at:
<https://www.prodwaregroup.com/investisseurs/en/ethics/>

If any doubt, he should not hesitate to ask their line manager first, or refer to the procedures set out in section 6.

1.4. Money laundering and the fight against terrorism

Money laundering involves disguising the origin of funds acquired through illicit activities, such as tax evasion, corruption or terrorism, to make them appear legitimate.

The Group is committed to conducting its business in compliance with applicable laws and regulations on the fight against money laundering and terrorist financing.

If any information concerning a third party with whom you enter into a relationship seems suspicious (or any element of a transaction, including with a partner you know), you must inform your manager or the Finance Department immediately, in the first instance, or refer to the procedures set out in section 6.

1.5. Economic sanctions and export controls

Certain countries or individuals are subject to economic sanctions imposed by countries or organizations such as the European Union or the United States (in particular, the Office of Foreign Assets Control (OFAC)). Certain products and goods are also subject to controls when they are to be exported.

The Group will not enter into a business relationship with a natural or legal person subject to an international sanction and undertakes to comply with export regulations.

All employees should not hesitate to ask the Legal or Finance Department for help in checking whether a transaction or an individual is subject to an international sanction.

1.6. Distributing fair and complete financial information

In keeping its accounts, the Group complies with all applicable laws and regulations, and endeavours to provide full, fair and accurate information within the required deadlines.

This information presupposes that everyone contributes, at its own level, to the accurate and exhaustive communication of information incumbent on him to the financial departments concerned as quickly as possible.

2. RESPECTING HUMAN DIGNITY AND OUR HUMAN RESOURCES

2.1. Physical health and safety

The Group is committed to protecting the physical and mental health of its employees, wherever they work, and to complying with the relevant legal provisions.

2.2. Harassment

The Group promotes respect for the physical and moral integrity of its employees and partners.

Consequently, any form of harassment, whether moral, physical or sexual, towards an employee is prohibited.

All employees are prohibited from violating the dignity of another employee by placing them in a degrading, hostile or violent environment.

If an employee witnesses an act contrary to these principles, he or she must immediately inform his or her line manager and/or the Human Resources Department and/or refer to the procedures set out in section 6.

2.3. Diversity and non-discrimination

The Group promotes diversity and is committed to complying with legal provisions on the prevention of discrimination.

It refrains from any discrimination based on gender, age, state of health, disability, religion, sexual orientation, nationality or political or trade union beliefs.

If an employee witnesses an act contrary to these principles, he or she must immediately inform his or her line manager and/or the Human Resources Department and/or refer to the procedures set out in section 6.

3. PROTECTING THE CONFIDENTIALITY OF INFORMATION AND INTELLECTUAL AND INDUSTRIAL PROPERTY RIGHTS

3.1. Inside information and insider dealing

If an employee (or any third party) is in possession of privileged and/or confidential information, they must take the strictest measures to safeguard the confidentiality of this information and not disclose it to anyone else.

It is forbidden to conclude, directly or indirectly, a stock market transaction using inside

information before it has been made public.

3.2. Personal data

Personal data is information relating to a natural person who can be identified or identifiable by reference to one or more factors specific to that person.

The processing of personal data refers to any operation or set of operations relating to such data, regardless of the process used.

The Group handles personal and confidential data on a daily basis, both internally and from its stakeholders.

All Group employees are required to take the utmost care when processing and/or storing their data in accordance with Group rules.

Each employee must understand and apply the internal procedures applicable to the protection of personal data and follow the associated training courses.

If in doubt, he should not hesitate to ask questions to the local Data Privacy Officer at dpo@prodwaregroup.com.

4. PROTECTION AND APPROPRIATE USE OF COMPANY ASSETS

The purpose of the Group's assets is to enable it to achieve its objectives and they must be preserved.

In the performance of their duties, all Group employees are responsible for the proper use and protection of the assets made available to them, whether tangible or intangible.

4.1. Image and reputation are among the Group's most important assets.

This is why all employees must respect the Group's values and not express themselves in the name of the Group or the entity to which they are attached without the express prior authorisation of their superiors.

Each employee must likewise show restraint when expressing himself in public, including in a non-professional environment or on social networks and must not denigrate the Group and/or its employees.

4.2. Intellectual property rights

Research and innovation are part of the Group's DNA.

Each employee must ensure that the assets resulting from research and development activities are protected and report any unauthorised or fraudulent use of these assets of which he or she becomes aware. They must not divulge any information relating to these assets without first ensuring that these assets and/or the information relating to them are protected.

4.3. Tangible assets

The principles set out above apply to the proper use of all material assets, in particular IT equipment, for which all employees are responsible in the performance of their duties.

5. PROTECTING THE ENVIRONMENT

As a service provider, the impact of the Group's activities on the environment is limited but not neutral. The Group is aware of this impact and is committed to taking measures to limit it as far as possible.

The Group undertakes to comply with all legal obligations and regulatory requirements relating to the impact of its activities on the environment.

Each employee must apply the internal procedures applicable to the protection of the environment and contribute in his or her own way to the GHG reduction targets defined by the Group.

6. APPLYING AND RESPECTING THE PRINCIPLES OF THE ETHICS CHARTER

6.1 Information and training

- All employees and stakeholders must read this Code of Ethics;
- They are required to take part in training sessions on the subjects covered by this charter or any other training necessary to enable the Group to ensure that its employees are informed of the applicable regulations and made aware of the best practices to adopt;
- The Group asks its stakeholders to commit to applying the same training and awareness requirements.

6.2. Help and reporting non-compliant behaviour

If an employee believes in good faith, or has doubts about, the application of the provisions of this Code of Ethics, he or she may freely and without fear of reprisal :

- Inform and/or seek advice from your line manager
- To the Legal Department of their entity or the Group
- Send an e-mail to compliance@prodwaregroup.com