

# Generix code of business conduct and ethics

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# Introduction

Dear Colleagues,

Our Group<sup>1</sup> is a major player in an industry that has become one of the most competitive and fast-moving in the world. Our transformation and ambitions for growth are making the way we do business richer but also more complex and more demanding.

In all the countries where we operate, we strive to be scrupulous, law-abiding and exemplary, so that we can assure our stakeholders of the strength of our values and ethics. We must inspire respect and trust, and protect our most cherished assets - the loyalty of our customers and the well-being of our employees.

This document is a guide, a reference for each and every one of us. Let's take the time to read it and make sure we apply it, because ethics is everyone's business.

**Raphaël SANCHEZ**



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# 01

## Why this code of business and ethics?

This Generix Group «Code of business conduct and ethics» document defines, explains and formalizes the rules of conduct and behavior, as well as the principles of action that we expect of ourselves and that all Generix Group stakeholders demand of us.

They express our respect for the law and for people, as well as our responsibilities towards our partners, customers, employees and other stakeholders in the Group.

It is the reference document for our ethics culture. Following and respecting this code of business conduct and ethics is mandatory for the Generix Group to comply with legislation and regulations as well as with the Group's internal rules, procedures and policies.

This document is not exhaustive and due to the constant need to re-evaluate our practices, its content will be updated as necessary.

A modern office environment with large windows and people working at computers. The scene is dimly lit, with a blue tint. Several people are seated at desks, working on computers. One person is standing and looking at a monitor. The office has a clean, minimalist aesthetic with white desks and chairs. The background shows large windows with a grid pattern, and some indoor plants are visible on the right side.

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### Each person's role

**The employee:** refers to each employee, manager and director of the Group since they all contribute to the life of the Generix Group.

Each employee undertakes to respect the rules of ethical conduct and the principles set down in this document.

Employees who market products or work in areas subject to specific regulations (such as public procurement, the environment, exports, taxes or customs) must also comply with other more specific rules.

**The manager:** Managers must be exemplary, i.e. respect, preserve, promote and implement these rules with their teams.

They help their teams interpret these rules of good business conduct and help them act accordingly.

**The Group Human Resources Department:** draws up and coordinates the updating of this document, ensures that it is applied by employees and takes the relevant decisions.

The Group Legal Department: validates the rules of good business conduct and the updates to these rules, and assists employees and managers in applying the provisions of this document.

**The Ethics Committee:** decides on cases of non-compliance with these rules and takes all necessary decisions and any corrective action required to remedy the situation.





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## 1. Generix, a group that protects the rights of its employees

### 1.1 Respect for the health and safety of employees

The Generix Group does everything in its power to ensure pleasant and safe working conditions.

Each employee undertakes to comply with all the Group's health and safety rules and regulations, as well as those of any customer for whom he or she may be working.

All employees must immediately inform the health and safety department or their line manager of any dangerous behavior or situation.

For example, managers respect rest periods, authorized absences and absences due to illness for their teams.

Each country has its own legal definition of harassment. The Generix Group condemns all acts and gestures intended to cause psychological injury or vexation, as well as any form of humiliation or intimidation. Harassment is not conditional on the existence of a hierarchical link; it can also exist between colleagues.

### 1.2 Fighting discrimination and harassment

Every employee has the right to a respectful work environment. Consequently, the Group does not tolerate any discriminatory behavior or harassment.

The Generix Group ensures that employees who believe themselves to be victims and employees against whom allegations have been made are protected against any action or behavior that could be prejudicial to them until the proceedings have been concluded.

The Generix Group treats these cases in the strictest confidence.



### 1.3 Protecting employees' privacy

The Generix Group, or third parties authorized by the Group, collects and updates personal information such as remuneration (external service providers) or medical data (supplementary health insurance manager).

Access to this personal information is strictly limited to those persons who need it to perform their duties. It will only be communicated to third parties with the consent of the person concerned (except for legal and operational requirements, such as responses to legal proceedings).

Under no circumstances should an employee's personal information be stored on the Generix Group's premises or systems.

Employees who have access to personal information are responsible for ensuring that such information is not disclosed or used in violation of the Generix Group's rules or practices.

The Generix Group promotes gender equality and diversity in all its entities.

## 2. Generix, a group that protects its assets and information

The Generix Group owns assets that are essential to its competitiveness and success. These assets must be used solely for the purpose of performing the Generix Group's business activities.

It is up to each employee to respect and protect the company property entrusted to him or her and thus help protect the company's assets.

### 2.1 Information systems internal to the Generix Group

Internal means of communication (e.g. Teams, Internet) and information processing are essential for collaboration within the Group and to ensure its proper functioning.

These information systems and the information they contain must be used by employees solely for the purposes of conducting the Group's business.

Each employee is responsible for ensuring that the use made of this information is legitimate.

The Generix Group provides all its employees with mandatory training in information systems security.

### 2.2 Information belonging to the Generix Group

Some information is confidential: for example, financial data, strategy, pre-launch projects, the organization.

Disclosure refers to any type of communication, whether written or oral. For example, the writer of the minutes of a project launch meeting is not authorized to divulge these minutes to anyone other than the persons concerned.

The obligation not to use or disclose such information applies to all employees, whether or not they are the source of the information.

In the context of specifically identified projects, certain employees may nevertheless be professionally required to share confidential information. In such cases, each of the employees concerned must first sign a Non-Disclosure Agreement (NDA) issued by the Legal Department.

#### What is a Non Disclosure Agreement?

This is an agreement whereby the parties agree to keep a certain amount of information confidential for a specified period. and telephony hardware).

#### Why is this necessary?

Example: Disclosure without authorization from the executive committee of the existence of a product that has not been announced by the Generix Group may harm the company by giving its competitors more time to offer a similar product.

#### Behavior required:

- Never discuss with unauthorized persons information that the Generix Group considers confidential or that has not been made public by the Generix Group,
- Never give this type of information to other Generix Group employees who are not bound by the same non-disclosure agreement,
- Be as discreet as possible in public areas or on public transport when communicating (telephone, computer screen) with colleagues bound by the same non-disclosure agreement.
- Never share or comment on this information with family or friends, as they could, in all innocence or simply through carelessness, pass it on to a third party.



### 2.3 Use of Groupe Generix trademarks and intellectual property

Trademarks: The Generix Group owns trademarks – words, names, acronyms or logos – which are used to identify or distinguish its services or products.

For example, the Generix Group's logo:



Generix Group trademarks must be used correctly. They must be spelled and reproduced in the exact same way as when they were registered with the appropriate bodies.

The Group Legal Department and the Group Communications Department may be consulted to ensure proper use of the Group's trademarks.

#### Intellectual Property:

The employee grants the Generix Group all rights to any ideas, inventions, writings or computer programs that he or she may develop, if these are produced within the scope of his or her employment contract.

The same applies to service providers when working on behalf of the Generix Group.

#### Solution source codes:

The Generix Group files the source codes of its solutions with approved organizations and regularly updates such filings.

### 2.4 Departure of an employee from the Generix Group

In the event of departure from the company, for whatever reason, the employee returns all property in his/her possession that belongs to the Generix Group (for example: computers, telephones, all documents and media containing information specific to the Generix Group).

The Generix Group applies procedures that ensure the employee no longer has access to tools and files. After the employee's departure, intangible assets created by said employee while on the job remain the property of the Generix Group.

### 2.5 Reliability and accuracy of information provided by the employee

All employees produce, record, manage or transmit information internally or externally. For example, a salesperson transmits orders, an accountant records income and expenses, etc.

Communicating false information, whether within the Generix Group or to third parties (for example, auditors, persons and organizations outside the company) is strictly forbidden.

Each employee is responsible for the truthfulness of the statements he or she transmits and undertakes not to make false or misleading statements.

## 3. Generix, a group that respects competition

The Generix Group prohibits its employees from denigrating the competition or making false or misleading statements about the competition, its products or services.

### 3.1 Respect for sales competitors

When a customer has already accepted a firm offer from a competitor, it is forbidden to offer identical products and services to this customer, unless the order has been canceled.

### 3.2 Contacts with competitors

Generally speaking, contact with competitors is possible.

Examples include contacts during sales to or purchases from other IT companies, participation in pre-approved joint bids, trade shows or business events, meetings of standards committees and industry representative bodies.

On the other hand, the Generix Group refrains from disclosing any information relating to pricing policies, contractual terms and conditions, costs, product marketing plans, market research, production capacities and, more generally, any of the Generix Group's confidential information.

**Best practice:**

If, during a meeting, a competitor raises any of the above issues, even superficially, the employee must inform the competitor that his or her comments are inappropriate and put an end to the conversation.

**3.3 Respect for laws that protect competition**

The Generix Group undertakes to comply with the competition laws and regulations applicable in the countries in which it operates.

The Generix Group refuses any agreement with competitors that would enable it to sell its products at the same price, in order to share markets or customers or by unlawfully abusing a dominant position.

**3.4 Information on competitors**

The Generix Group gathers information on its competitors, using lawful sources of information. This practice enables it to assess the advantages of its own products, services and marketing methods.

The Generix Group prohibits the use of dishonest means to obtain business secrets or any other confidential information about a competitor. Illegal practices such as unauthorized intrusion, recording of conversations, bribery or theft are obviously reprehensible. But so too is hiring a competitor's employees for the sole purpose of obtaining confidential information.

Requesting confidential information from the employees of a competitor or a Generix Group customer is reprehensible.

**3.5 Denigration of the Generix Group by a competitor**

If an employee is informed of an act of denigration against the Generix Group (targeting its solutions or strategy, for example), he or she will inform the Legal Department, which will take all necessary steps to put an end to these acts of unfair competition.

**4. Generix, a group that respects its customers**

The Generix Group acts in the interests of its customers and undertakes not to provide any advice that would be contrary to their interests.

The Generix Group respects the legislation applicable in customers' countries in relation to our activities and products, and in particular regulations on the protection of personal data.

**4.1 Behavior in the customer's presence**

All employees represent the Generix Group and must convey an exemplary image.

All employees undertake to behave in an irreproachable manner (for example: courteous and respectful towards any contact and in particular towards and in the presence of a customer).

The Generix Group will not tolerate any inappropriate comments made in front of a customer, such as disparaging the Generix Group, its services and products, or the work of a colleague.

**4.2 Public Procurement**

Public procurement regulations help public sector customers and their representatives to obtain the products and services they require at a competitive price. These regulations are highly variable and often complex, so particular attention must be paid to respecting local specificities and laws.

Each employee undertakes to comply with all regulations applicable to public procurement in the country concerned.

During a public procurement procedure, it is forbidden to seek to influence the customer's decisions, or obtain confidential information.



## 5. Generix, a groupe that is demanding in its dealing with suppliers

Impartiality and integrity govern the choice of a supplier, and no special treatment is given to any supplier, regardless of the volume or cost of the purchase.

The Generix Group places its suppliers in competition with each other so as to select the best. Prices and other information provided by suppliers is confidential. No employee is authorized to disclose or use this information outside the Generix Group.

The Generix Group has procedures in place to ensure that suppliers are irreproachable, particularly in terms of IT and financial security, and that they undertake to comply with these procedures.

The Generix Group ensures that its suppliers are respectful of the company in their behavior and in the way they conduct their business.

The Generix Group reserves the right to break off contractual relations in the event of failure by a supplier to meet its commitments.

The Generix Group is committed to a CSR approach; it implements processes to ensure that its suppliers meet their CSR commitments.

The Generix Group applies local legislation on the processing of personal data and in particular the European General Data Protection Regulation (GDPR) in the subsidiaries concerned.

Generix Group ensures reciprocity with respect to this on the part of its suppliers and customers.

## 6. Generix, a group that protect relations with third parties

A third party is an individual or legal entity outside the Generix Group (e.g. customers, suppliers, partners, etc.).

The Generix Group maintains relationships with third parties that are essential to its development. For this reason, for all transactions, the specific nature of each relationship must be understood and mastered in order to act ethically.

### 6.1 Public or political figures

The Generix Group makes no financial contribution and provides no support that could be considered a direct or indirect contribution to candidates or political parties, including through intermediary structures (campaign committees, fund-raising associations, etc.) or through the political activities of its employees.

The Generix Group formally prohibits any electoral campaigning on its premises.

### 6.2 Business partners

The Generix Group's activities are monitored by journalists and consultants.

No employee is authorized to contact them or answer their questions without authorization. Employees who are approached must first consult the Finance and Administration Director regarding financial aspects and the Marketing & Communication Director for other aspects.

### 6.3 External communication

The Generix Group's activities are monitored by journalists and consultants.

No employee is authorized to contact them or answer their questions without authorization. Employees who are approached must first consult the Finance and Administration Director regarding financial aspects and the Marketing & Communication Director for other aspects.

#### 6.4 Information about third parties

The Generix Group is committed to protecting the personal information of third parties and safeguards the privacy of its contacts.

When confidential information concerning other companies or other persons is to be used, the employee undertakes to use it appropriately and make it accessible only to employees of the company who have a legitimate need to know it.

If an employee receives information from a third party, he or she must use it with caution to avoid the Generix Group being accused of misappropriation or unlawful use of this information.

The use of confidential information (whether oral, visual or written) may not take place until the Generix Group and the third party concerned have formally agreed on the terms of the use thereof in a written agreement approved by the Legal Department.

#### 6.5 Software acquisition

Special care should be taken when purchasing software from third parties. Indeed, all software is protected by copyright and sometimes by patents or trade secrets.

Before using any software (whether free or not), all employees must ensure that it has been properly licensed and that the procurement process has been validated.

Before accessing software or approving a license agreement, each employee undertakes to respect the terms of the license and the internal procedures for use (see Rules of good conduct for the Group's IT).

In the event of a problem concerning ownership or licensing rights for software, the employee must consult his or her line manager before distributing the software within the Generix Group.

If an employee privately purchases software and copies for personally owned hardware (e.g. photo software):  
He or she must not reproduce any part of this software for the purpose of performing work on behalf of the Generix Group, or load this software into a computer system belonging to the Generix Group.

### 7. Generix, a group that combats corruption and oversees business gifts

#### 7.1 Principles

It is forbidden to offer, promise or pay anything of value to a public official or to any private person in order to obtain an advantage.

It is also forbidden to receive anything of value from a person who could influence or be perceived as influencing the Generix Group or its customers.

The Generix Group does not tolerate any form of corruption or any act that may be perceived as such anywhere in the world.

Gifts, services or invitations to attend events are commonplace in business life. However, while such gifts contribute to good relations, they are only authorized under certain conditions.

Indeed, gifts and invitations can be instruments of corrupt practices aimed at obtaining an undue advantage of some kind (a contract, privileged information, advantageous contractual terms, etc.) or they may at the very least give rise to suspicion as to the existence of collusion between a person and the Generix Group.

#### **Purposes of business gifts. For example:**

- Promote a product or service (example: Invitation to a trade show),
- Thank the employees of another company following a successful partnership operation

This is why the Generix Group strictly controls this practice.

Subject to applicable local laws and the approval of the line manager, the employee is authorized to:

On behalf of the Generix Group: (i) offer gifts to customers and/or suppliers or (ii) accept gifts from customers and/or suppliers, when their value is symbolic or low and provided that they are not such as to cast doubt on the honesty of the giver or the impartiality of the recipient.

Examples: meals, tickets to a show, accepting or giving a gift of low value, such as an advertising object («goodies»), when such gifts are usually offered to third parties who have a similar relationship with the customer or supplier.

**It is prohibited to:**

Accept from a supplier or a customer, or to offer to a supplier or a customer, money or a gift which would be or could reasonably be considered to be of such a nature as to influence or give the appearance of being able to influence the Generix Group's business relations with this supplier or this customer (example: when renewing a Call for Tenders).  
- This applies to the employee and any member of his or her family.

Examples: acceptance payment of expenses for transport, meal and accommodation from suppliers incurred to attend training courses or information sessions.

## 7.2 Gifts and public administrations

Relations with public administrations are strictly regulated. No gift or sum of money may be given to an executive or representative of a national or foreign administration, if this gift is or could reasonably be considered to be directly related to the business relations that he or she has with the Generix Group.

The Generix Group prohibits any payment or gift to a public figure, political party or candidate. This concerns any public entity, including universities or public companies.

## 8. Generix, a group that prevents conflicts of interest

Any employee can find him or herself in a situation of conflict of interest if they have activities or personal interests that they develop at the expense of the interests of the Generix Group.

Employees undertake to avoid situations in which their loyalty could be compromised.

**Examples of conflicts of interest:**

- Having a financial interest in a company with which the Generix Group has a business relationship (Suppliers, competitors, customers, distributors, etc.).
- Helping a competitor in any way whatsoever.

### 8.1 Investing financially in a competitor or supplier

It is forbidden to invest in any way whatsoever in a competitor.

In the event that an employee has already invested in a competitor or supplier before joining the Generix Group, and that this investment is sufficiently significant to enable him or her to have decision-making powers within this company, the employee must waive these rights and powers.

Obviously, these investment rules cannot be circumvented by acting through an intermediary.

If you have any doubts about your investments, please consult the Group Legal Department.

### 8.2 Employment of a relative in the IT sector

If an employee has a family member or close friend who is an employee of a Generix Group competitor or supplier, he or she undertakes not to divulge any information relating to the Generix Group to his or her acquaintances.

### 8.3 Participation in public life

Employees may participate in public life on a personal basis, but in this capacity they may be confronted with a decision concerning the Generix Group (purchase of Generix Group services, for example).

The employee undertakes to respect the law, which may require him or her not to take part in decisions.

To ensure the Generix Group is not affected, the employee undertakes to make it known that he/she is an employee of the Generix Group so as to counter any accusation that he/she tried to hide his/her links with the company.

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## Employee commitments

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## Employee commitments

Each employee complies with the rules of good business conduct and undertakes to respect them.

Any employee who fails to comply with these guidelines may incur civil or even criminal liability, as well as that of the Generix Group.

### 1. Prohibition to compete with Generix Group

It is forbidden to work for a competing company, in any capacity whatsoever (employee, consultant, director, etc.).

It is forbidden to market, whether for profit or not, products or services that compete with the Generix Group's products in return for any direct or indirect remuneration whatsoever.

### 2. Prohibition to be a supplier of the Generix Group

No employee may be a supplier to the Generix Group, represent a supplier to the Generix Group, work for or be a director of a supplier to the Generix Group.

### 3. Working within the Generix Group and using the Generix Group's property

All employees shall refrain from performing any professional tasks other than those assigned by the Generix Group during their working hours, whether on the Generix Group's premises, on assignment or when working from home.

Similarly, no employee is authorized to use the facilities, telephones, equipment, resources or information belonging to the Generix Group for work outside the company.

### 4. Personal opinions

An employee's opinions are expressed in his or her own name and in such situations employees must never give the impression that they are speaking or acting on behalf of the Generix Group.

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## Whistle-blowing

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Our rules of good business conduct are essential to our reputation and to the success of our business.

Since we vouch for proper enforcement of these rules, we must react if we witness acts or practices that are contrary to them. This is why the Generix Group encourages its employees to report any acts contrary to these rules of good conduct that they witness, have access to or are aware of.

## 1. Procedure

The employee reports the acts of which he or she has been a direct witness, or of which he or she has access or knowledge, to the Committee.

An acknowledgment of receipt is sent within 7 business days.

The Committee checks that the acts come within its remit.

If the acts do not come within the Committee's remit, the case is passed on to the relevant management team to resolve the problem, if necessary with the Committee's support. The employee who made the report is informed of the reasons.

If the facts fall within the Committee's remit, it appoints a Generix Group management representative, having no conflict of interest with respect to the situation reported, to investigate the case and gather the facts.

The department in charge of the investigations submits its report to the Committee within 2.5 months of the matter being referred to it.

The Committee meets and decides on the corrective measures to be taken to put an end to the disorder and, if necessary, to sanction the acts.

If a Committee member has a conflict of interest, he or she cannot take part in the decisions.

The Committee gives its ruling within 3 months of the acknowledgment of receipt, and informs the whistle-blower of the measures planned or taken to remedy the matter.

The Committee closes the case if the allegations are inaccurate or unfounded, or if the report has become irrelevant. The author of the alert is informed in writing that the case has been closed.

The person in question (whether an employee or a person from outside the company) will be informed of the nature of the allegations made against him or her and of the findings of the investigation.

During the investigation, information will only be shared with persons authorized to access this information by virtue of their responsibilities or who are required to process the report and/or take any appropriate measures.

## 2. Guarantees

The procedure guarantees the completeness and confidentiality of the information gathered when following up on a report, in particular the identity of the whistle-blower, the persons accused and any third parties mentioned in the report. The principles of impartiality, adversarial process, presumption of innocence and applicable local legislation are also guaranteed.

Any employee may be questioned in the course of the procedure. They undertake to cooperate fully and completely, and to provide all useful information and documents on request.

No employee who has reported in «good faith» acts of actual or potential corruption, influence peddling, conflict of interest or harassment, in compliance with the present whistle-blowing procedure, may be penalized or subjected to reprisals.

An employee who fails to report facts that they have witnessed or of which they have been informed cannot be sanctioned.

The employee who initiated the whistle-blowing procedure is informed of the results of the investigation and of the decisions taken.

The Generix Group ensures that employees are protected against any measure or behavior that could be prejudicial to them until the procedure has been completed.

The Generix Group treats the case in the strictest confidence. The whistle-blowing system has been subject to a privacy impact assessment by virtue of the GDPR. Any employee may exercise his or her rights of access, modification and deletion by writing to: [dpo@generixgroup.com](mailto:dpo@generixgroup.com).

In «good faith» here means that when the whistle-blower initiates this procedure, he or she considers that the information reported is complete and truthful, even if such information is subsequently found to be incorrect.

Any deliberately misleading or defamatory report or which pursues an objective contrary to our principles of neutrality, fairness and respect, will be sanctioned.

The Ethics Committee can be contacted at the following address: [generixethics@generixgroup.com](mailto:generixethics@generixgroup.com).



