

POMA GROUP
**ANTI-CORRUPTION
CODE OF CONDUCT**

Foreword

The development of the POMA group (hereafter referred to as the “Group”) in new regions and the increasingly stringent legal obligations regarding anti-corruption practices in force in many countries, in particular in France, have led us to set up a compliance mechanism to promote a culture of integrity, ethics and compliance within the company.

Drawing its inspiration from the best European and international anti-corruption standards, such as those of the OECD (Organisation for Economic Co-operation and Development), the UK Bribery Act or the US FCPA (Foreign Corrupt Practices Act), the French “Sapin II” law (law of 9 December 2016 relating to transparency, the fight against corruption, and the modernisation of economic life) demonstrates the determination of France to create a binding legal framework for combatting corruption. The “Sapin II” law is intended in particular for companies established on French soil, whether they operate in France or in other countries, without prejudice to the application of stricter anti-corruption legislation when any exists. From now on, individuals and legal entities can be punished for corrupt practices committed in France or abroad.

This anti-corruption code of conduct (hereafter referred to as the “Code”) has been drawn up to help Employees, managers, board members, corporate representatives and temporary workers (hereafter referred to as the “Employees” as defined in this Code and not as defined in the French Labour Code) to familiarise themselves with the basic principles to be followed in terms of preventing and detecting corruption in the context of their day-to-day activities. Specific procedures can be set up to provide concrete responses addressing certain situations that are deemed risky.

The Code may also be sent to partners (clients, suppliers, consultants, sales representatives, etc.) and some of its principles may be included in contracts. This Code is intended for all Employees pertaining to the Group and all entities controlled by the Group. It is hereby reiterated that Employees must in all cases comply with the national and international legislation and regulations applicable to their activities in each of the countries in which the Group operates.



1. Compliance with the fundamental principles

Compliance with the applicable legislation

The Group complies with the legislation and regulations applicable to its activities, regardless of the country in which it is operating, in good faith and with due respect for its partners.

Compliance with regulations in terms of export and import operations

The Group is involved in many international operations. All its Employees must comply with the international trade rules that apply to its activities, in particular the customs, export and import rules governing its products and services.

Compliance with competition law

Competition law seeks to guarantee compliance with the principle of freedom of trade and industry within a free-market economy.

The Group is aware that business practices carried out in compliance with the principle of fair competition are synonymous with progress and development. They promote innovation and the creation of high-quality products.

Therefore, in the context of its activities, the Group must take the necessary steps to ensure that it does not contravene rules relating to competition law. It is hence very important to identify situations that could constitute anti-competitive practices.

Anti-competitive practices can take different forms:

- Coming to an agreement with a competitor with regard to the allocation of clients in a given geographical area;
- Taking part in arrangements with competitors with a view to fixing prices or rigging a call for tenders;
- Exchanging confidential or strategic information with competitors that could potentially distort competition;
- Abusing a dominant market position to obtain unjustified advantages from a client or supplier;
- Refusing to sell to a client without a legitimate reason.

Protecting the Group's assets

The Group's assets include tangible and real estate assets (material assets), but also the methods, know-how and processes that it develops (intangible assets), and which remain its property.

These assets must not be used for personal gain, unlawful purposes or activities that are not connected to the Group's activities.

Protecting the Group's image

Group Employees must act at all times in a manner in keeping with the values and principles of this Code in order to protect the Group's image.

They must not speak or write in the Group's name without being authorised to do so, and must restrict themselves to their field of expertise or responsibility, not confusing their own opinions and interests with those of the Group.

When using social media, Employees must be careful to avoid disseminating any confidential data, and to uphold the image of the Group and its Employees.

All Employees must be aware that the company would suffer significant damage to its image and reputation if it were convicted of corrupt practices.



Communication and processing of information

The Group's competitive advantage is based on technical, commercial and financial information, and it is absolutely vital for all Employees to know how to protect this information. Accidental or intentional disclosure of this information could seriously affect the competitiveness of the Group since it could, for instance, result in know-how being counterfeited and misappropriated.

All Employees must be aware of this essential need to protect confidential or sensitive information. The Group urges its Employees to take the necessary measures to protect the Group's information, as well as that of third parties.

It is worth reiterating that any information that has not been made public must be considered as information that must not be disclosed, even if no specific obligation has been formulated to this end. Confidential information includes in particular company results, forecasts and financial data, human resources information and personal data, information on new products or orders, and information relating to prices, drawings and business prospecting activities.

These protection measures may take a variety of forms, in particular:

- Refraining from sending information to third parties before they have signed a non-disclosure agreement;
- Complying with IT safety and security rules issued by the Information Systems Department;
- Following instructions regarding computer data protection;
- Remaining vigilant regarding the protection of information in paper format: do not leave documents unattended in a public place, vehicle, meeting room, etc.
- Refraining from having confidential conversations in a public place: train, plane, family gathering, etc.

In addition, the Group takes steps to ensure that all information disseminated internally and externally is compliant and accurate. This is particularly true in the context of calls for tenders, in which bidders are selected by clients and/or international funding agencies based on the information sent.

In parallel, in the context of activities within the Group, Employees may be required to access confidential data concerning partners, clients and suppliers. This information must be treated with the same level of protection.



2. The rules governing ethical business conduct

Preventing and combatting corruption and influence peddling

Corruption can be defined as the act, for a public entity or private person vested with specific duties, of soliciting or accepting a gift, offer or promise in return for completing, delaying or omitting to complete a given task that falls, directly or indirectly, within the framework of their duties.

Corruption can be either passive (the person or entity vested with the specific duties accepts the gift or benefit) or active (the act of proposing the gift or benefit to the person vested with the specific function).

ILLUSTRATION

Active corruption: during the implementation of a contract, a contractor suggests making an additional payment not stipulated in the contract to the Engineer, with the aim of having his studies validated and releasing the corresponding payments.

Passive corruption: in this particular case, the Engineer accepts payment of the corresponding sum in cash.

Influence peddling refers to the act where a person receives – or solicits – benefits or gifts with a view to abusing his/her influence (real or presumed) on a third party in order to obtain a favourable decision.

This process involves three players: the beneficiary (the one who provides the benefits or gifts), the intermediary (the one who uses the credit related to his/her position) and the target, who holds the decision-making powers (generally speaking authorities, public administrations or international organisations).

A distinction can be made between active influence peddling, when a decision is made as a result of a private individual asking a highly influential person to misuse his/her power, and passive influence peddling, when the influential person makes the decision on his/her own initiative.

In this case, the three people involved, i.e. the beneficiary, the intermediary and the “target” whose decision is influenced, are liable to sanctions.



ILLUSTRATION

Active influence peddling: a contractor gives money to a civil servant to influence the award of a public procurement contract in his favour.

Passive influence peddling: a minister asks for a job for his daughter in exchange for the award of a medal to the person who agrees to find one for her.

The difference between corruption and influence peddling lies in the nature of the act expected in return. If the act falls within the prerogatives of the public decision-making party, it is corruption.

But if the act consists in using one's influence to sway the choice of another decision-maker, then it is influence peddling.

The benefits or favours exchanged can vary widely in nature and significance and do not necessarily require any physical act:

- Money, service, favour or supplies;
- Gift;
- Trip;
- Entertainment;
- Hospitality, promotion or distinction;
- Award of a contract or title;
- Payment of an intermediary to use his/her power to obtain a favour from a decision-making authority;
- Administrative decision, etc.

The breach is established from the moment when the corrupt pact is proposed or accepted, regardless of whether the benefit is paid or the promise is fulfilled.

The Group and its Employees must not under any circumstances take part in corruption or influence peddling in any form, in France or any other country.

The Group wishes to protect its reputation and to take no risks, even though this stance could result in the loss of contracts or have other unfavourable commercial consequences.

Should a legal entity be convicted of corruption, the consequences would be highly detrimental and could include:

- Exclusion from bidding for contracts;
- Inspection by external organisations regarding the implementation of anti-corruption measures;
- Loss of confidence of partners, potentially resulting in the termination or non-renewal of contracts;
- Negative impact on the Group's image in the eyes of clients and investors;
- Fines.





Be transparent

Inform your line manager or the ethics lead of any potential or confirmed corrupt situation.

Clearly reject all requests for unlawful payments.



Accept a commercial transaction that will give rise to behaviours that could be qualified as active or passive corruption or aiding and abetting influence peddling.

Propose, offer or promise a benefit (directly or via a third party) to a person working in the public or private sector with the sole intention of obtaining or maintaining a commercial transaction or benefiting from a facility or favour in breach of a regulation.

Accept a request from a person who claims to have influence over a public or private official and suggests using this influence with a view to obtaining a contract or a favourable decision.

The behaviour to adopt in certain situations involving specific corruption risks is described in greater detail below (situations of conflicts of interest, relations with third parties, gift and invitations, facilitation payments, etc.).



Preventing conflicts of interest

A conflict of interest refers to any situation in which the personal interests of an Employee (or those of his/her family) could conflict with those of the Group, influencing his/her judgement and/or actions (a personal conflict of interest). The notion of personal interests must be understood in its broadest sense. The interest can be direct or indirect, financial or moral, and concerns the person, his/her close relatives and friends, and people or organisations with whom the Employee has, has had or intends to have business or professional relations.

With regard to personal conflicts of interest, it is for instance forbidden to:

- accept a benefit from a client or supplier for which the Employee could feel indebted;
- let any personal relations with clients, suppliers or other Group co- contractors influence one's professional decisions to the detriment of the Group;
- use one's position to satisfy interests that are contrary to those of the Group;
- use any information acquired during the implementation of professional activities for one's own benefit or that of a third party, to the detriment of the Group;
- take part, in one's capacity as an Employee, in any contractual relationship established, to the detriment of the Group, between the Group and an entity in which this Employee or a close friend or relative has a personal interest.

ILLUSTRATION

An Employee holds financial interests (including via an intermediary) in a company with which the Group has business relations through the said Employee.

A conflict of interest can also refer to a situation in which the interest of the company interferes with that of stakeholders in a project, and hence influences the independent, impartial and objective performance of the contracted assignments or the duties of an Employee (conflict of interest related to the performance of an assignment).

With regard to conflicts of interest relating to the performance of our activities, it is for instance forbidden to request the services of a company for an assignment included in our contract if the said company is already acting as a consultant to the client in the context of the same project (e.g. as Engineer or Assistant to the Owner or in some other client consultancy role).

ILLUSTRATION

A contractor has signed a works contract with a public-sector client. During the implementation of the contract, the client asks this contractor to carry out a working design study. However, this contractor does not have the in-house skills to perform it and subcontracts it to an engineering company. But the latter company is also involved in this project in its capacity as Engineer.

The professional assignments of individual Employees must not conflict with their personal interests. Likewise, any situation placing the Group in a conflict of interest with regard to the performance of its assignments must be avoided.



Remain vigilant and ask yourself the right questions in situations where the objectivity or impartiality of professional decisions may have been altered, in order to identify potential conflicts of interest.

Refuse to take part in any decision-making process that could generate a conflict of interest.

Report any potential or confirmed conflict of interest immediately.



Deal with a commercial partner if an Employee or a member of his/her family holds interests or a managerial position in that company.

Count on one's own judgement alone. Conflicts of interest can sometimes be very tricky to identify.

Underestimating the stakes and consequences of a conflict of interest.

Maintaining upstanding relationships with third parties

The choice of partners is a critical issue. The actions of a partner may result in the Group being held criminally liable and potentially facing very significant fines, especially if the company is proved to have knowingly used third parties to commit acts of corruption or failed to take the necessary precautions to avoid selecting corrupt partners.

Moreover, gifts and invitations may only be given to or received from third parties in accordance with the rules in force within the group (see the section below on the topic of gifts and invitations).

Consultants:

The Group has an in-house sales department which handles business development in France and internationally. However, the Group may on occasion call on external commercial consultants, agents or representatives (referred to hereafter as “Consultants”) for the purposes of developing a new geographical area or new activities, should legislation in the country require the use of local staff or there be a need to maintain our presence in that country.

This type of partnership requires strict vigilance, because the activity and/ or actions of a sales representative can pose a risk of illegal practices. The Consultant’s reputation must be systematically checked before a contractual relationship of any kind is entered into. Prior approval from the legal department is required before any approaches are made to such partners.

ILLUSTRATION

A Consultant offers a company its services to “support the company’s activities in a particular country”, “perform a market survey” or “assist with contract negotiations” in return for a payment that does not seem appropriate.

Co-contractors:

Calling on co-contractors or members of a consortium or joint venture can generate interesting business opportunities and new projects. However, this type of partnership can also pose risks and result in the company and/or its Employees being held liable.

To safeguard the Group against risks of this type, preliminary background checks must be performed and the necessary steps must be taken to ensure that the co-contractors abide by the commitments included in this Code or have their own anti-corruption procedures of a level at least equivalent to those in place within the Group.

ILLUSTRATION

Two companies form a consortium to respond to a bid invitation. The consortium is not awarded the contract but one of the two companies wishes to use certain information disclosed by the other one for the requirements of a new bid invitation. This underlines the importance of non-disclosure agreements with partners, to keep data confidential for a set period of time following the signature of the agreement.

Suppliers and subcontractors:

Suppliers and subcontractors of the Group effectively contribute to the pursuit of the Group's objectives.

The Group is determined to maintain transparent and loyal relationships with its suppliers and subcontractors, in particular by:

- Implementing decision-making and tendering procedures based on selection criteria that are impartial and objective;
- Obtaining safeguards regarding the quality of the services and products they provide;
- Ensuring that they adhere to the Group's values and this Code;
- Avoiding situations of excessive dependence.

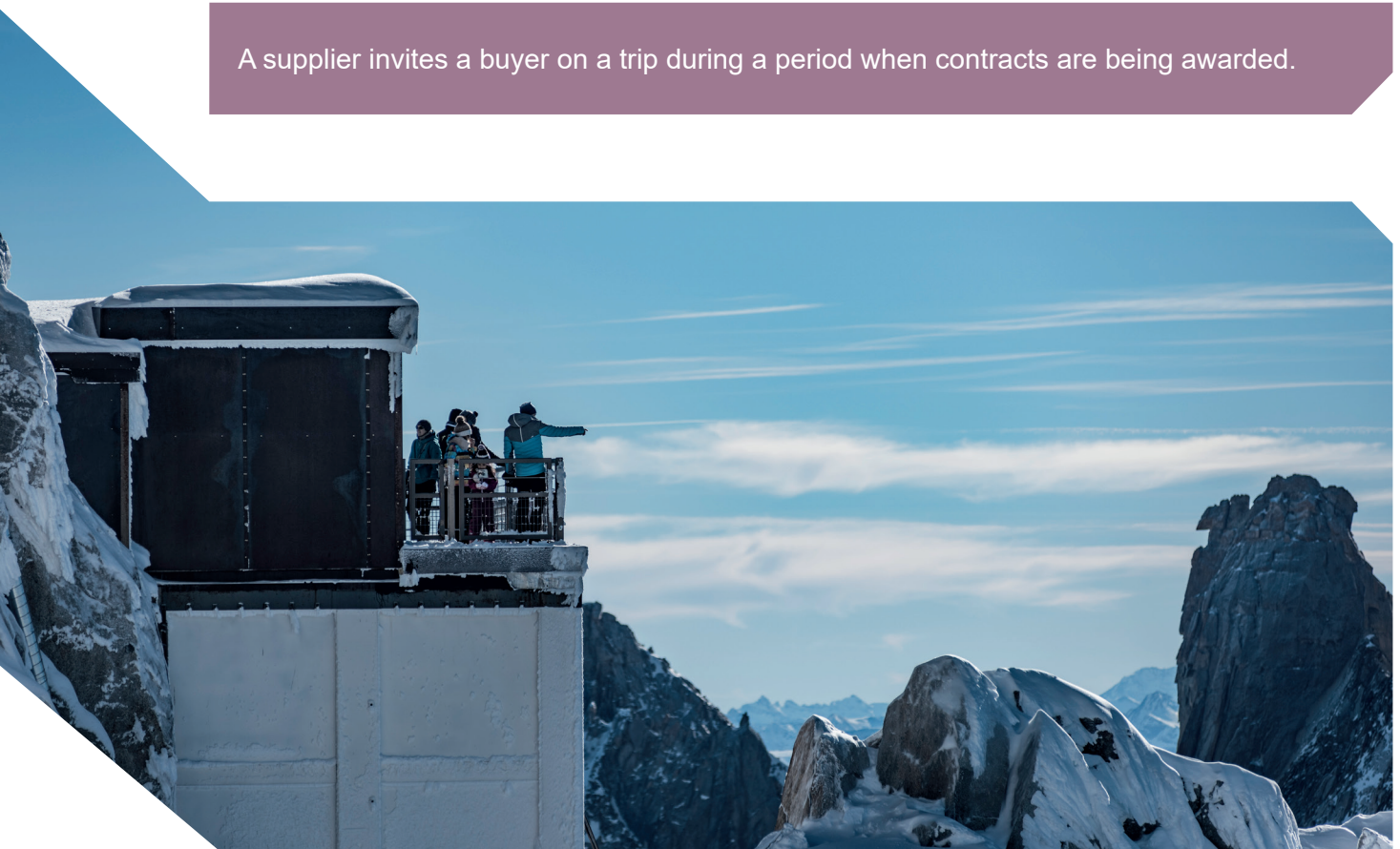
As a reminder, it is forbidden to accept or offer courtesies that could lead to a conflict of interest with our suppliers and subcontractors.

It is, however, permissible to accept items or invitations/meals of a very small monetary value in a demonstrable business context and in accordance with the Code, if such a practice forms part of the cultural context (for instance, an item with a very small monetary value is defined under the French tax code as having a unit value not exceeding €73 per beneficiary per year).

Dinner invitations can be accepted with moderation. Buyers must encourage reciprocity, in particular by paying when the supplier makes the journey to the Voreppe site.

ILLUSTRATION

A supplier invites a buyer on a trip during a period when contracts are being awarded.





Exercise diligence when selecting partners or service-providers to ensure that they share the Group's ethical values and commitments and/or adopt a similar approach to ethics.

Evaluate partners and service-providers in such a way as to prevent any inappropriate conduct prior to contract award.

Refuse to enter into a contract with a partner for whom "warning signs" are identified during the verification process.

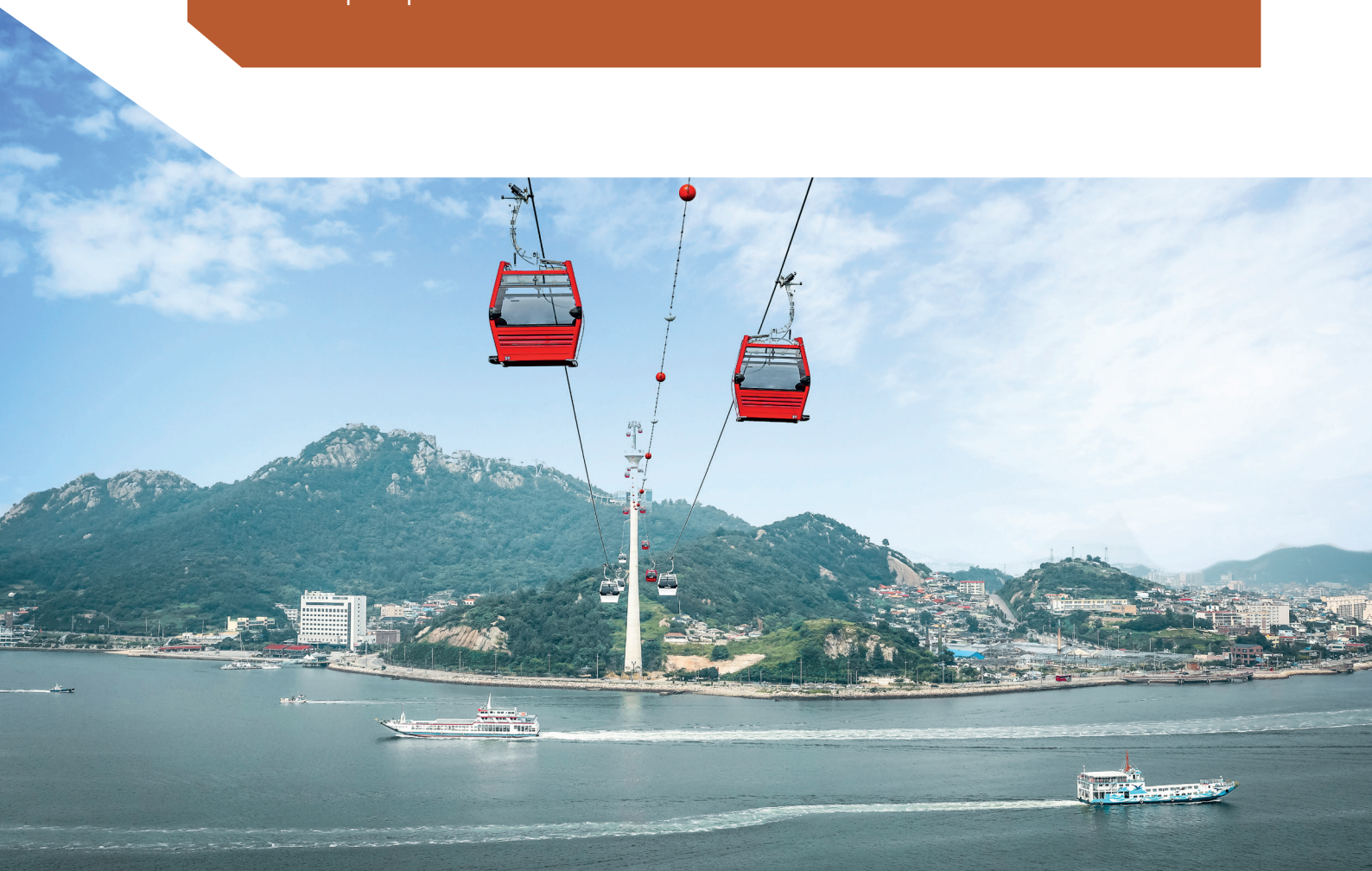


Call on Consultants in countries with a high corruption index.

Enter into an agreement with a partner who refuses to make a clear commitment to abide by anti-corruption principles or sign a contract with clear stipulations notably as to the object of the services rendered and well-balanced payment terms.

Enter into an agreement with a partner who asks for his payments to be made to a country other than his country of residence or the one in which the services are to be provided.

Enter into an agreement with a partner whose past activities, reputation and credentials give legitimate grounds to suspect that he might conduct his business in a manner not in keeping with ethical principles.



Gifts and invitations

Gifts and invitations to attend events are frequently exchanged in business settings.

They can be instruments for corrupt practices aiming to gain an improper benefit (a tender, privileged information, advantageous contract conditions, etc.).

They can take a wide variety of forms. These may include, for instance, restaurant meals, invitations to a sporting or cultural event, payment of business travel expenses (transport and/or hospitality), financial loans, guarantees or sureties, services or works performed free of charge, loans of premises, gifts from an Employee of the organisation to a close relative or friend, recruitment of a close relative or friend, or study grants for children and close relatives or friends.

Outside the scope of marketing programmes implemented by the Group, Employees must not accept or propose a gift or advantage that cannot be attributed directly to normal courteous business relations and is not of modest commercial value (reciprocity test), including with regard to the local context.

As a reminder, before incurring any expense, the Employee must obtain permission from his or her line manager. The value must be reasonable. The client's name must be stated on the corresponding expense report.

Employees must satisfy themselves that such gifts or benefits have not been given with a view to influencing a decision, improperly obtaining or maintaining a business transaction, rewarding a decision, or receiving a facility or favour of any kind implying a breach of the rules of law.

For instance, giving or accepting gifts and invitations may be authorised in the following conditions:

- They are permitted by the applicable legislation;
- They are not requested by the beneficiary;
- They do not seek to obtain something in exchange or an improper advantage;
- They do not seek to influence a decision and are hence not exchanged at a strategic moment (e.g. during a tender invitation, signature of agreements, voting, permitting, contract award, changes to legislation or regulations, etc.);
- The beneficiary must not exercise decision-making authority in regard to a forthcoming or current decision affecting the interests of the organisation;
- They are occasional and in keeping with business activities;
- They do not cause embarrassment if they are made public;
- They are made within a strictly professional context.

Gifts given by the company are recorded in its accounts and registers.

As stated in the section concerning suppliers and subcontractors, it is possible to accept items or invitations/meals of a very small monetary value in the conditions defined above.



ILLUSTRATION

Over the course of a year, a buyer accepts five cases of six bottles of wine as personal gifts from the same supplier.



The gift or invitation is given or received in total transparency and in a strictly professional context.

The gift or invitation given or received complies with the applicable legislation and local customs.

Keep and pass on all supporting documents relating to gifts and invitations given so that they can be recorded in the accounts in total transparency.



The gift or invitation given or received seeks to obtain something in exchange or an unfair or improper business advantage.

The gift or invitation given or received seeks to influence an official procedure.

A gift or invitation is proposed in an inappropriate context (to a beneficiary who is a public official, during a tender invitation, upon renewal of a contract, etc.) and of a value likely to arouse suspicion.



Facilitation payments



Facilitation payments are improper direct or indirect payments made to a public official for the purpose of completing administrative formalities that should be cleared through normal legal channels. They aim to incite public officials to perform their tasks more quickly and more efficiently.

This type of payment may be requested in cases such as customs inspections, the issuing of administrative authorisations, visas, work or site operation permits, or the filing or registration of administrative documents (e.g. to incorporate local legal entities or complete tax formalities).

These payments may be tolerated in certain countries where they are current practice, but they are deemed tantamount to corruption under French law.

The Group rejects facilitation payments in any form. Employees must not propose or promise cash payments or gifts or benefits of any other type to State officials or people who are in a position to exert direct or indirect influence on them.

Payments to intermediaries must only be made if they are lawful, compliant with the conditions of a contract and made in exchange for a formal invoice. No payment must be made without appropriate documentation, notably proof of the work carried out. Receipts must be provided for reimbursable expenses. Payments must never be made in cash.

ILLUSTRATION

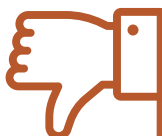
The company appointed to transport goods from France to Russia tells me the customs official has proposed to simplify the formalities in exchange for payment of a small sum of money.



Politely turn down the request for a facilitation payment, giving a reminder of the Code of Conduct in force within the Group, which prohibits such payments and requires anyone receiving a request for one to report it to the management and to the ethics lead.

Ask for a receipt or supporting document (invoice).

Try to anticipate administrative formalities in order to avoid situations that may lead to facilitation payments.



Think that it is impossible to do otherwise

Conceal a facilitation payment (in an expense account, for instance).

Ask third parties to make facilitation payments on your behalf.

Donations, patronage, sponsorship, political contributions, foundation

While such actions are lawful in most countries, they may be open to criticism if they seek to obtain unlawful compensations from which the company could benefit either directly or indirectly. Generally speaking, donations or expenses made on behalf of public officials, even indirectly, pose a particularly high risk and require special vigilance.

The Group has a major social role to play on account of its activity in the field of mobility. To step up its commitment in this area it has decided to create its own foundation. It guarantees that the actions of its foundation are carried out in total independence and within the framework of procedures that abide by the ethical principles laid down in this Code.

ILLUSTRATION

A company has responded to a tender invitation, and the representative of the public official who organised it has suggested that the company should sponsor a public establishment headed by a close friend or relative.



Monitoring the financial situation

The standards and procedures implemented by the Group in relation to accounting and financial controls seek in particular to ensure that the books, registers and accounts are not used to conceal unlawful acts such as corruption or influence peddling.

Accounting:

Each operation or transaction must be recorded correctly according to the criteria defined by the legislation and accounting principles in force in the countries concerned, and must be duly authorised, sincere, verifiable and in line with the Group's interests.

To comply with requirements regarding the truth, integrity and transparency of the data recorded for each operation, the Group must maintain complete and accurate up-to-date documentation concerning the activity carried out, ensuring that checks can be performed with a view to:

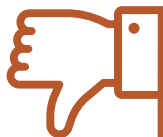
- Verifying the accuracy of the accounting record;
- Immediately determining the characteristics of the operation and the reasons for carrying it out;
- Facilitating a formal chronological reconstitution of the operation;
- Verifying the decision-making, authorisation and implementation process, and identifying the various levels of responsibility.



Each accounting document must accurately reflect the facts given in the supporting documents.

Make sure that its supporting documents are easily accessible.

Declare any omissions, falsifications or inaccuracies observed in the accounting or supporting documents.



Make undocumented payments, i.e. payments that are not recorded in the accounts.

Make payments in cash.

Make a payment to a partner in a country other than the one in which he is domiciled or in which the services are being performed.

Internal control:

Internal control refers to all the tools that are required or useful in order to process, manage and verify the Group's activities so as to guarantee compliance with laws and internal procedures and thus protect the Group's property, manage its business activity efficiently and lawfully and supply clear, truthful and accurate information on its assets and its financial situation.

In the framework of their duties and their expertise, the Employees must contribute to designing, setting up and using an effective internal control system.

Employees must abide by all the rules and procedures contained in the internal control system, and provide sincere answers to questions and requests posed by auditors.



Money laundering

Money laundering is the process of seeking to conceal the origin of funds derived from illegal activities (misappropriation of public funds, mafia-type activities, drug or arms trafficking, corruption, tax fraud, etc.) in order to reinvest the said funds in lawful activities (e.g. real-estate construction).

The Group undertakes to comply with all national and international regulations and stipulations pertaining to money laundering.

The Group and its Employees must not in any case or under any circumstances participate in activities relating to the laundering of funds derived from illegal or criminal activities.

ILLUSTRATION

An international company uses a shell company based in a tax haven to conceal financial transactions relating to unlawful activities.



Be vigilant with respect to circulating funds, especially in dealings with partners using funds of unclear origin.

Verify that the destinations of all payments made are legitimate (especially if they are in a country other than the one in which the co-contractor is domiciled or in which the services are being performed).

Declare all suspicions of money laundering.



Accept funds of obviously suspicious origin.

Negotiate with partners in regard to illegal activities.



3. Implementing the Code

Recommendations

Employees with any doubts or concerns regarding a given situation must not hesitate to share them with their line manager or the ethics lead.

All recipients of this Code must familiarise themselves with its content, share it, and:

- Refrain from all conduct and all other initiatives that do not comply with its provisions;
- Report any information relating to breaches of the Code in the context of the company's activities to one of the people defined within the whistleblowing process defined below;
- As regards third parties that maintain relations with the Group, all Employees must:
 - o Inform them of the provisions of the Code and involve them in a suitable manner;
 - o Require compliance with the provisions of the Code when carrying out the activities for which they are collaborating with the Group;
 - o Take the steps described in this Code in the event that a third party fails to abide by its obligation to comply with the provisions laid down herein.

Under no circumstances may a conviction that one is acting in the interests of the Group or its assignments even partly justify conduct that is contrary to the provisions of applicable legislation and the principles described in this Code.

Penalties

This Code is enshrined within the company's by-laws of the relevant entity.

Any Employee who fails to abide by the provisions of this Code will be held liable and may face, in an appropriate and proportionate manner, the disciplinary sanctions defined in the by-laws as well as possible legal action and claims for damages.

Breaching the rules laid down in this Code exposes the Group and any Employees involved to penalties which may include criminal charges and cause harm to the Group's reputation and business.

In the case of corruption and influence peddling more particularly, individual penalties include prison sentences of up to several years and very heavy fines. Penalties for the company may represent a significant share of its turnover, in addition to being debarred from bidding for contracts and made ineligible for credit insurance, having authorisations withdrawn, etc.

Whistleblowing system

The POMA whistleblowing system provides a means of reporting suspected or confirmed cases of:

- Failure to comply with the Code of Conduct;
- Existing or future risks within the Group. These may consist of:
 - o A crime;
 - o An offence;
 - o A manifest and serious breach of a law, regulation or international commitment duly ratified or approved by France;
 - o A breach of unilateral action taken by an international organisation duly ratified or approved by France;
 - o A threat or serious damage to the general interest.

For instance, acts of corruption, fraud, favouritism or situations posing a serious risk or causing serious damage to health, safety or the environment.

This system is open to in-house and external Employees.

An Employee who witnesses a situation falling into one of the categories listed above can inform any of the following people:

- Their direct or indirect line manager;
- The human resources manager, more particularly for matters relating to respect for individuals, health or safety in the workplace;
- The quality and environment manager, more particularly for matters relating to harm to the environment;
- The ethics lead, for ethics-related matters;
- whistleblowersoftware.com email address to be used by people outside the Group.

The matter can be reported by any means including email, telephone or face-to-face discussion.

A specific system has been set up for reporting situations via the intranet. Instructions on how to use this system are also provided.

All necessary steps will be taken to maintain the requisite confidentiality and ensure that Employees who use the whistleblowing system in good faith do not face reprisals of any kind for doing so.



