

The purpose of this charter is to recall the fundamental values defended by DIGORA. It applies to all DIGORA suppliers, employees, and managers in all countries where the DIGORA Group operates, in compliance with European standards and local laws and regulations.

DIGORA conducts itself in the business world in accordance with the laws, regulations and customs and acts in an upright, honest, and transparent manner, particularly about human rights, health and safety, the environment and compliance with competition rules.

Through various standards imposed on its employees, DIGORA is committed to respecting the laws and regulations that apply to the profession and/or the sector of activity of its clients.

The DIGORA Ethics **CHARTER**

A code of ethics and business conduct, rights, and duties for its employees.

This code defines a set of common principles of business integrity for all DIGORA's suppliers, customers, collaborators, employees, and managers.

In addition, DIGORA expects third parties who have a business relationship with DIGORA to apply ethical standards at least equivalent to those described in this Code.

DIGORA

98 rue de Hochfelden
F-67200 Strasbourg

■ tél. : +33 3 88 10 49 20
■ email : info@digora.com

 www.digora.com

I - A CODE OF ETHICS AND BUSINESS CONDUCT

DIGORA carries out missions that fall within its field of competence and knowledge. To do so, DIGORA masters the fundamental knowledge of its fields of intervention and expertise, maintains, and develops it, in line with the missions entrusted to it.

DIGORA provides its clients with formalised services that are personalised to the needs expressed. These services must comply with the commitments made in terms of time, cost, and quality.

Ethical, responsible, and legally compliant business practices

DIGORA undertakes to comply with all laws and regulations applicable to its activity, thus ensuring that its suppliers, service providers and customers are commercially compliant in the context of their commercial relations.

DIGORA is committed to respecting the rules, laws and regulations concerning health, the environment, working conditions and social justice in its relations with the various stakeholders linked to its activity.

The fight against corruption

DIGORA is committed to acting against active and passive corruption, influence peddling, extortion, and bribery in accordance with Articles 435-1 and 435-3 of the Criminal Code.

DIGORA does not tolerate any form of bribery such as directly or indirectly soliciting, offering, or accepting anything of value from any person or the attention of any other person to exert undue influence on that person's actions or decisions during his or her duties, including for the purpose of obtaining an illegal or improper advantage.

Thus, DIGORA employees must not commit acts of corruption and must not use intermediaries for the purpose of committing such acts.

The fight against money laundering

DIGORA is committed to the fight against money laundering.

In this context, employees must comply with internal policies and procedures that include rules and procedures for prior checks to report unusual or suspicious transactions.

Market Integrity: Compliance with Competition Rules

DIGORA treats its partners with respect and in no way engages in practices prohibited by current competition laws and regulations.

Each DIGORA employee must refrain from any behaviour that could be considered an anti-competitive practice in the market in which he or she operates.

Companies, their managers or employees who violate the laws prohibiting anti-competitive practices may be subject to sanctions that DIGORA may decide to take.

Political activities

DIGORA respects the commitments of its employees who, as citizens, participate in public life. However, any employee who, during his or her personal activity, contributes to the decisions of a state, public authority, or local community, must refrain from taking part in a decision affecting DIGORA or one of its entities.

DIGORA shall not contribute directly or indirectly to the financing of any political activity.

Independence and transparency

DIGORA undertakes to carry out the assignments entrusted to it in complete independence and to serve the interests of its clients in full.

DIGORA undertakes to inform its clients of the links it has with its partners if they are likely to create a conflict of interest.

Group image; protection of assets and data

DIGORA's employees undertake to refrain from any denigration, negative communication, not to support a boycott, institutional campaign, or any unfavourable action against DIGORA of any nature whatsoever, including when using social media.

Any external communication is subject to prior validation. No communication may be made by an unauthorised person.

Each DIGORA employee must protect the property and assets of DIGORA. More specifically, know-how; information on markets, technical or commercial practices, offers or technical studies; lists of customers, suppliers, subcontractors; computer equipment and tools, intellectual property rights, all these assets must only be used in the performance of the duties of DIGORA employees.

Confidentiality

DIGORA undertakes to apply professional secrecy, to preserve the intellectual property and intangible assets of its clients as well as the information gathered during its missions. To this end, a confidentiality clause is included in all DIGORA employee and subcontractor employment contracts.

The environment

DIGORA is committed to a precautionary approach to environmental issues, to initiatives that promote greater environmental responsibility and to the development and dissemination of environmentally friendly technologies.

II - EMPLOYEES' RIGHTS AND DUTIES

2.1 Employees' fundamental rights

DIGORA undertakes to respect the freedom of association, to recognize the right to collective bargaining, not to contribute to any form of forced or compulsory labor or child labor and not to discriminate in employment and occupation.

Respect for others and diversity

In its field of activity, DIGORA ensures respect for the individual and his or her private life, safe working conditions and the development of individual and collective skills.

DIGORA is committed to developing a working environment for its employees that is free from pressure, prosecution or persecution or any action considered as harassment.

DIGORA will not discriminate on the grounds of origin, morals, gender, disability, political or religious opinion or trade union membership.

Equal opportunities based on merit and skills.

Decisions on recruitment, promotion, continuity of employment, training and remuneration should be based on the skills, competences and experience required for the job concerned. A person's suitability for a particular job should not be assessed based on personal or family relationships.

Health and safety

DIGORA is committed to preserving the physical and mental health of its employees, as well as ensuring their safety. The company is actively committed to combating all forms of bullying and harassment, complying with all applicable regulations, and supporting training in work methods, work instructions, safety rules and the use of safety equipment.

Freedom of expression and rights of representation

DIGORA respects the right of its employees to express themselves freely in respect of others, to establish or join a trade union organization, and to be represented by staff representation bodies in exchanges with management.

Human rights

DIGORA undertakes to respect the protection of human rights and to ensure that its employees are not complicit in human rights violations in the course of their professional duties.

Protection of personal data

DIGORA is committed to a virtuous approach to the personal data of its employees and customers. To this end, a Personal Data Protection Officer (DPO) has been appointed within the group and measures have been put in place to regulate data transfers outside the European Union.

2.2 Employees' duties

Morality and responsibility

DIGORA employees shall observe the laws and regulations as well as the rules of ethics specific to their activities in accordance with the provisions included in their employment contract.

Conflicts of interest

Each DIGORA employee is bound by a duty of loyalty towards DIGORA; in particular, employees are prohibited from holding an interest in a company, whether it is a client, supplier, or competitor of DIGORA, if this investment is likely to influence their behaviour in the performance of their duties within DIGORA.

Protection of confidential, personal, and privileged information

DIGORA employees have a duty to protect confidential information held by DIGORA, or by themselves during their professional activities.

Employees must comply with the internal principles of data protection (fairness, equality, legality, and transparency), data management, data integrity and confidentiality, including the protection of personal data against accidental access, modification, loss, or disclosure.

III - THE WARNING MECHANISM

To be able to prevent and manage any situation contrary to the present ethics charter, DIGORA encourages its employees and third parties to issue an alert.

The group's ethics line ethique@digora.com is accessible to all employees and third parties wishing to report a breach of the present ethics charter.

All reports made in good faith will be dealt with within a reasonable period and the identity of the person making the report will be kept confidential to the extent permitted by law.

An alert must be based on information provided in good faith and in an objective manner.

The use of an ethics line is not mandatory. It is a complementary mechanism to the usual methods of transmitting information available to an employee, by reporting directly to his or her manager.