

Aginode Code of Ethics and Business Conduct

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The companies in which the Company Aginode directly or indirectly owns investments are separate entities. In this publication, the expressions 'Aginode', 'Group' and 'Aginode Group' are sometimes used for convenience where references are made to Aginode companies in general. Likewise, the words 'we', 'us' and 'our' are also used to refer to Aginode companies in general or those who work for them. These expressions are also used where there is no purpose in identifying specific companies.

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We are Aginode. Let's enable more.

Aginode, designs, manufactures & sells connectivity solutions for digital networks in broadband infrastructure eco systems.

While operating in many different countries, Aginode shares and upholds the same core values in the way it conducts its businesses around the world : **One Team, Drive** and **Care**. Care embraces the highest levels and standards of safety, integrity, respect and value of the environment and of the people, customers, business partners and all our stakeholders.

We want to make our own mark by reinforcing this core value through our policies and processes in governance, ethics and compliance. Our unwavering commitment to integrity, and the well-being of both our people and customers is essential to securing our long-term success and sustainable growth. Regardless of our role or position within the Group, it is not only what we achieve, but how we achieve it, that builds the trust of our colleagues, customers, partners, and all stakeholders.

Aginode's code of ethics and Business Conduct is our guide and reference for applying our ethical standards in our day to day. This guide is not only for internal implementation, but shall also be a reference for our client's confidence in Aginode.

We are Aginode... Ethics is a shared responsibility that concerns us all. We rely on every individual to lead by example and to raise their hand if they encounter any doubt or concern regarding potential violations of the Code.



An everyday guide.

Aginode's General Management Procedure 1 (GMP-AGI-01) known as Code of Ethics and Business Conduct, establishes the business principles applicable to all Group's employees. The rules and guidelines it contains are the boundaries within which every employee must adhere and operate every day. This Code sets practical guidelines which supplement the rules, procedures and standards defined in your countries which remain applicable.

Compliance with laws: an absolute obligation

Compliance with the laws and regulations of the countries which the Group operates is an obligation bearing no exception. Any breach of the Code may trigger disciplinary sanctions and, in some cases, legal consequences such as fines and imprisonment.

The Aginode Code of Ethics and Business Conduct is designed to provide practical assistance and help us resolve the issues and dilemmas we can face in our work. How should certain customer or supplier requests be handled? How should we behave with our colleagues? As an employee of Aginode you also have a responsibility to accept personal invitations to training on topics highlighted in this Code.

The summary above provides a quick way to find the subjects which are covered.

That being said, it's impossible to anticipate every situation that might arise. If you are confronted with an issue of ethical or business conduct, consider asking yourself the following questions:

- Is it legal?
- Does it comply with Aginode Code of Ethics and Business Conduct?
- Am I certain of the appropriate conduct to be taken?
- Do I feel like I am making the right decision?
- What might people think if this became public?

When a doubt arises, you can seek advice from your manager or the HR Corporate team.

If you are a manager, you have more responsibilities, because:

- You set the tone, lead by example and promote ethical conduct.
- As a decision-maker you are confronted with matters that can be complex.
- Your team will come to you for assistance and advice, and you must be able to respond accordingly.

Example of potential disciplinary sanctions for breach of Ethics and Compliance obligations:

- Warning / formal notice
- Disciplinary layoff
- Disciplinary transfer
- Demotion / downgrading / rank reduction
- Dismissal / termination
- Dismissal without termination indemnities

Global Human rights ¹.

Aginode endeavors to uphold the principles of the Universal Declaration of Human Rights. Respect for all human beings, their diversity, dignity and safety are at the heart of Aginode's core values. This is what the Group wishes to illustrate through the Code of Ethics and Business Conduct, which provides an overview of the principles that Aginode applies all along its value chain and within the communities in which it is present. This Code of Ethics and Business Conduct is presented to every new employee upon joining Aginode. It is displayed on Aginode website and updates are relayed via emails or other digital canal. In addition, the Group encourages all partners it works with to enforce the policy.

1. Global Labour Standards

A. Legal Employment

The Human Resources function are responsible for the employment process. Future Aginode's employees receive an employment offer before they start working for the Group, with details on the job they are to perform, salary conditions and reference to reasonable notice periods.

Each employee has access to information about their rights and obligations according to local legislation. Each member of the HR team and/or social partners are committed to support employees in order to obtain this information.

When applicable under governmental regulations, employees in the Group are issued a work certificate when leaving the Company.

B. Child labour & young workers

The Group strives to compliance with the legal working age set by local legislation and does not employ children under the age of 16. Apprenticeships may be carried out from the age of 16 respecting local legislation, as this professional experience is a pre-requisite for their education on condition that the health, safety and morals of the young persons concerned are fully protected and that the young persons have received adequate specific instruction or vocational training in the relevant branch of activity.

C. Elimination of any form of forced or bonded labor

Aginode strives to the elimination of forced or bonded labour, prison labour and trafficking in persons within its direct and indirect operations. Aginode does not employ workers agencies or firms involved in human trafficking, child labour or bonded labour through agencies or firms involved in human trafficking, child labour or bonded labour.

D. Safeguard of fair remuneration rights

Aginode guarantees the minimum wages set by local legislation and ensures regular payment to the employee. Aginode abides by all local hiring remuneration legislation and strives to ensure fair and equitable employment practices for all employees, at all hierarchical levels in the Group.

E. Promoting fair recruitment

¹ This part on Global Human Rights is based on the Universal Declaration of Human Rights: [Universal Declaration of Human Rights | United Nations](#)



Recruitment in Aginode replies to a labour market need, and does not serve as a means to displace or diminish an existing workforce, to lower labour standards, wages, or working conditions or to otherwise undermine decent work.

Aginode has a Diversity & Inclusion policy which upholds fairness and non-discrimination in all people processes, including recruitment.

F. Training and development

In order to develop the potential of each employee and to share best practices, Aginode wants to provide its employees with access throughout their career to the training necessary for them to be able to perform their job properly and to ensure their Employability.

2. Work conditions

A. Working conditions and hours of work

The Group complies with local legislation on hours of work and ensures all employees have at least one day of rest per week and that break times are provided during the working day, and that the rate of pay for overtime is respected.

The Group grants paid leave, sick leave and parental leave in accordance with local legislation.

B. Security

The Group does its utmost to ensure and provide safe and secure working conditions in the workplace for employees.

C. Harassment

Aginode is committed to creating and maintain a work environment in which people (employees and third parties) are treated with dignity, decency and respect. We aim to for an environment characterized by mutual trust, respect and the absence of intimidation, oppression, exploitation or harassment.

The Group takes any form of harassment very seriously and has a zero-tolerance policy towards any form of harassment, violence or intimidation against our employees by their peers, supervisors, customers or vendors.

A whistleblowing system is in place allowing employees to alert any improper behavior or conduct. The whistleblowing system allows alerts to be anonymous whenever authorized by local law. Details of the system are to be found in last part of this code "Whistleblowing System Speak UP" and in the dedicated Whistleblowing Policy.

Aginode promptly investigates all complaints of harassment and ensures swift and appropriate measures when applicable, and training where necessary.

Aginode prohibits retaliation to an employee who reports or files a complaint of discrimination or harassment.

D. Health & Safety

Aginode is committed to guaranteeing the safety of any person on site. Safety at work is based not only on the technical reliability of the facilities and equipment, but also on employee training and



the strength of the Group's Health & Safety culture. Aginode is committed to providing a safe working environment with limited risk.

We must all comply with the hygiene, health and safety rules, and help our colleagues, service providers, or any person on site to do the same.

We are attentive to safety problems and ensure that our actions do not result in any risk for others or for ourselves.

Safety is an absolute priority for Aginode. Regardless of the degree of urgency, safety comes first.

Give workers representatives adequate information on measures taken by the employer to secure occupational safety and health.

3. Freedom of association and right to collective bargaining

Aginode wishes to develop constructive relations with its employees and their representatives. We respect the right of employees to freely express themselves, form or join unions and workers organizations of their choice and participate in collective negotiations. We recognize the role and responsibilities of our employee representatives and are committed to communicating, negotiating and bargaining collectively with them to address matters of collective interest.

4. Equal opportunities

A. Non-discrimination right

Aginode is committed to creating an environment that guarantees equal opportunities for all forming a workplace where equality, respect and consideration for one another are the norm.

Our decisions, in terms of attraction, recruitment, development, compensation, termination and working relationship are made to prevent discrimination, on the bases of (included but not limited to) race, color, ethnicity, gender, origin, sexual preferences, age, disability, health condition, pregnancy, religion, marital status, other civil, social or political characteristics of the employee.

B. Diversity & Inclusion

At Aginode, we recognize all the differences that make each employee valuable and unique. This diversity of experience, origin, personality, gender and disability is considered key to our global ambition to make the world more connected with sustainable solutions. We strive for an inclusive work environment where everyone can engage, speakup, flourish, and therefore contribute to our business results.

Our main Diversity & Inclusion commitment is to reach a level of gender equality that truly represents the diversities of our customers, suppliers and communities in which we serve.

We expect all employees to know and respect our Diversity & Inclusion policy.

5. Aginode Personal Data Protection privacy

As set out in Aginode Personal Data Protection Policy (**GMP25 - under review**), Aginode is committed to protect the personal data of our employees and business partners.

Privacy is not for sale, it's an asset to protect. It is therefore Aginode policy to mitigate risk of data breach, data losses or misuses.



Procedures and processes are governing the use of personal information to address the growing legitimate expectations about privacy and data protection.

6. Business Partners

Corporate Social Responsibility (CSR) is at the heart of Aginode's strategy. Aginode commits to respect fundamental CSR principles, in the areas of:

- the human rights and labour standards,
- the environment,
- the fight against corruption

Wherever we operate, whoever we work with. We request that supplier and sub-contractors respect the same CSR principles and sign out CSR Chart.

Aginode suppliers shall commit to these CSR principles, for all their activities and sites, and ensure that their own suppliers adhere to similar principles.

Aginode suppliers shall implement a continuous improvement CSR action plan. Aginode will be glad to support suppliers to identify actions and share best practices.

Aginode takes into account several criteria to award business to suppliers, the supplier CSR performance being one of the criteria.

Aginode suppliers are encouraged to get their CSR performance assessed, certified by a CSR scorecard, and up-dated regularly.

7. Practical implementation

The principles listed above in the Human Rights are to be implemented by all Aginode Group, wherever the sites are located. The respect of such principles is monitored through various Key Performance Indicators (KPIs) and processes:

- All employees have access to this document and all newly hired employee receive an example of it when arriving.
- Trainings are deployed within Aginode to ensure the good knowledge and practice of Ethics and Compliance. Training contains reminders about the basic ethics & human rights rules and encourages anyone, whether potential victim or witness, to report any suspicion or violation through the whistleblowing tool.

Sanction: this first part of the Code of Ethics and Business Conducts contains fundamental principles for the protection of basic human rights. Hence, any willingful violation of the above principles, or any breach which is not remedied, will trigger disciplinary sanctions up to dismissal, and in some cases legal consequences such as fines and imprisonment.



Fighting corrupt practices.

Aginode Group wishes to make a positive contribution to the countries and communities in which it operates by creating wealth and jobs and developing skills.

Aginode does therefore not tolerate corruption and is committed to showing transparency in its transactions and lobbying practices.

1. Bribery and Corruption

Bribery and corruption is incompatible with the ethics of Aginode. The violation of anti-corruption laws is sanctioned by heavy fines for companies and prison sentences for individuals.

A. Active corruption

None of us should directly or indirectly make or offer to make payments to government officials or customers, whether public or private entities, to obtain contracts or other advantages. This includes indirect payment through intermediaries such as agents, freight forwarders, commissioners and others. It includes facilitation payments even though, in some countries, facilitation payments are legal as they may still be illegal in the country of origin. In some legal systems, simply turning a blind eye on suspicions of bribery and corruption can result in liability for Aginode and for you personally.

B. Passive corruption

None of us should directly or through an intermediary, request or receive gifts, promises or undue advantages of any kind whatsoever, for ourselves or to the benefit of a third party, to act or refrain from acting in the exercise of our functions at Aginode, or to grant an advantage or favor to a third party thanks to our position at Aginode.

C. Influence Peddling

Aginode employees must not solicitate a person who has, or claims to have, influence on the decision-making of a public official, in order to obtain, through the improper influence of such person, an undue advantage from a public official, to the benefit of Aginode.

Any request, receipt or the acceptance of the offer or the promise to use such improper influence is prohibited, whether or not the influence is exerted or whether or not the supposed influence leads to the intended result.

Influence peddling may be considered as a type of corruption. The difference between trading in influence and bribery is that, for influence peddling, the recipient of the advantage is not the decision-maker/ official and the latter may be unaware of the crime.

Conversely, it is also prohibited for Aginode employees to uphold themselves as someone close to power and to offer to Aginode's commercial partners to exert improper influence on public officials in their favor, to obtain undue advantages of any type whatsoever.

2. Gift and invitation

We must not offer gifts or make favors in return for favorable treatment or to gain any business advantage. When we offer gifts or invitations, we must remain within the reasonable limits, which the Group policy sets at EUR50. This threshold may only be adapted pursuant to applicable laws and customary commercial practices. Aginode discourages its employees from accepting gifts



and invitations from business partners. Group policy sets the acceptable gift-receiving value at EUR50. In any case, we must not accept any gift that could influence (or be considered as intended to influence) our judgment or which may undermine our duty of loyalty to Aginode. Any gifts offered or received must comply with the above principles and we may never accept gifts in cash. When in doubt, discuss it with your manager.

3. Conflicts of interest

A conflict of interest can arise when social, economic or political activities of employees, or those close to them, influence or could influence their objectivity and loyalty to Aginode.

Working in a position or function or holding a financial interest in a competing organization, customer, supplier or commercial partner of Aginode, when your duties within the Aginode allow you to have an influence over this relationship, constitutes a conflict of interest.

You must avoid conflicts of interest as your decisions at Aginode shall not be influenced by personal or private considerations.

But if you find yourself in a situation that could represent a conflict of interest or give the impression of influencing your judgment and actions, you must disclose it to the Corporate HR Service with your manager in cc.

4. Politically exposed persons

Any Aginode employee who could be perceived as «politically exposed» must disclose it to his/her line manager and HR Corporate service.

Will be considered as a politically exposed person any Aginode employee who:

- Has or has been entrusted with prominent political, governmental, military, judicial or administrative function or held a senior executive functions within a state-owned corporation or important political party, whichever the country;
- of whom a business associate, an immediate family member or close friend holds or has held such a position.

Your disclosure will lead to internal assessment of your position by your line manager your human resources manager and HR Corporate team with legal/compliance external support if necessary. They will determine if you are, indeed, deemed politically exposed. In such case, it will be assessed whether your personal situation may have an influence on your functions within Aginode. If so, specific remediation measures will be implemented, such as a confidentiality ring, dual decision-making process, real location within the Group to a position at least equivalent.

5. Political activities

The general policy of Aginode is that we do not make contributions to political parties, organizations or committees. In any event, any payment made must comply with the law and have the prior written agreement of the Area Management.

The Group respects the right of its employees to participate in political activities personally as long as it is clear that they do not represent the company or act on its behalf. Employees must not engage in political activities during work hours or use the company's resources



6. Community relations

Aginode supports a dialogue with communities and representatives of civil society.

Support for local initiatives in favor of solidarity, health, education, economic and social development, the environment, culture and sports are the responsibility of each entity after receiving approval from the Area's Management.

7. Money laundering prevention

Money laundering occurs when the illicit origin or nature of money or assets is covered up by legitimate business dealings. The opposite, which consists in the use of legitimate funds to support illicit activities (including the financing of terrorism or counterfeiting) is also prohibited.

Aginode undertakes to comply with all international laws on money laundering and financing of illegal activities. The Group only deals with customers whose commercial activities and source of funding are legal.

Each company of the Group implements customer identification procedures.

Each of us must be vigilant with regard to orders or unusual payments, particularly complex exchange structures and fund transfers to or from countries unrelated to the transaction or tax havens.

All instances where payment is received from a legal entity which differs from the corporate entities registered as clients and agreed recipients of the order/agreed invoiced entities may raise legal and accounting issues. This type of situation may turn out to be highly detrimental to the Group and expose us to money laundering accusations if we are not in a position to demonstrate the origin of the funds received.

All commercial transactions must go through the preliminary due diligence process established in the Group Tender Review and Contract Risk Management Procedure (**GMP8 - under review**), which includes reputational background check of the commercial partner, transportation/invoicing/payment conditions, etc. This step is fundamental : indeed, if a payment from unknown origin were to be credited on the Group's accounts, the situation would be critical in terms of compliance and recovery.

Fair competition.

Aginode is committed to loyal and open competition in strict compliance with antitrust laws. These laws apply to every level of business.

Aginode does not tolerate any breach to antitrust laws. Antitrust and competition laws prohibit competitors from entering into any form of agreement, from concerted action, whether express or tacit understanding or collusive action that may have as their object or effect the restriction of free competition. Such violations may be complex and can give rise to severe civil and criminal penalties, which can apply to private individuals in addition to legal entities. Competition rules apply to all hierarchy levels within the Aginode Group.

Each of us must be very careful not to entertain relations, even informal ones, with competitors which may be qualified as an illegal agreement or arrangement.



Details are provided in the General Management Procedure “Aginode Antitrust Guidelines” (**GMP6 - under review**) as well as in the Guidelines for when distributors/clients are also our competitors.

When in doubt, your line manager or HR Corporate team should be consulted early enough and prior to acting to avoid any risk of non-compliance.

Export control and trade sanctions.

It is Aginode policy to ensure that its trade operations worldwide comply with export and import control laws and with regulations establishing trade sanctions and embargoed countries ("trade regulations").

Before exporting or importing a product, software, technology, or any related document, its category and classification must be verified in order to determine whether special authorization is necessary. A background check must similarly be run on all our commercial and financial partners to ensure that they do not appear on lists of entities or individuals under sanction.

Accordingly, it is the responsibility of all Aginode employees to know and follow the applicable Trade Regulations. Please also consult the Export Control Guidelines for more details (**GMP 7 - under review**).

Failure to observe export and import control laws may result in restrictions or prohibitions on the way Aginode conduct business. Non-compliance with trade regulations can result for Aginode in charges, fines and impact on operating our business: difficulties in obtaining licenses, risk of being black listed by governments, disruption or termination of relations with banks and suppliers, restrictions on travel.

For Aginode employees such failure can result in serious consequences including fines and/or imprisonment.

Our commercial partners.

To build solid, long-lasting relationships Aginode is committed to honesty, trust and mutual interest with its customers, suppliers and subcontractors. Commitments to third parties are made by duly authorized employees.

We respect the tangible and intangible property rights of our commercial partners in respect of any items that they entrust to us.

We preserve the confidentiality of information entrusted to us.

We manage the personal data of our commercial partners responsibly and in compliance with the laws governing data protection privacy.

1. Customer relations

Aginode treats its customers with integrity and fairness whatever their size.

We are committed to promoting our products and services in a manner that is honest and fair. We ensure that any statements, communications and presentations that we make are accurate and reliable.



2. Agents, consultants, distributors and business partners

Contracts establishing commercial relationships between the Group's entities and agents, representatives, consultants and distributors are signed exclusively by two authorized Senior Officers of the Aginode contracting Company.

Contracts are only signed once all required integrity due diligence has been completed and all required approvals have been obtained.

Details are provided in the General Management Procedure "Preventing corruption when dealing with Agents, Consultants, Distributors and Business Partners" (**GMP4 - under review**).

We require our agents, consultants, distributors and Business Partners to commit to comply with business and ethics rules, particularly with regard to anti-bribery laws, comply with competition laws and import and export control regulations.

3. Supplier and subcontractor relations

We are judged on the quality of the relationships that we maintain with our suppliers. In particular, our customers and rating agencies evaluate us on the basis of our selection criteria as well as the commitment of our suppliers to conduct their business responsibly.

We select suppliers through open and competitive invitations to tender. We must ensure that all tenders are given equal consideration.

Through the signature of our CSR Supplier Charter, we request our suppliers to share our commitments, particularly with regard to labor conditions, respect for human rights and respect for the environment.

Our shareholders and financial partners.

Aginode ensures equal treatment for all its shareholders. We communicate regularly, openly and transparently with our shareholders and our financial partners.

Aginode complies with strict standards in respect of corporate governance, internal control and risk management.

1. Accuracy and completeness of financial data

It is essential that all financial, legal, economic, industrial, commercial, social and environmental information provided is accurate and not misleading to ensure compliance with our legal obligations, particularly towards our shareholders, our partners and the authorities, to justify decisions we make and to preserve the credibility and reputation of our Group.

All obligations, procedures and guidelines laid down by your legal entity with respect to internal reporting and the recording, safeguarding and archiving of information, must be complied with.

We must ensure that all transactions and operations are recorded accurately and in full detail and we must cooperate fully with the internal and external auditors responsible for verifying them.

When in doubt, you should share your questions, seek advice, and, if necessary, immediately report any irregularity or violation of these rules to your manager or HR Corporate team.

Falsifying a document or creating misleading information constitutes fraud.



Aginode does not tolerate fraud of any kind. All our data must accurately reflect the relevant situation, operation and transaction.

Environment and product responsibility

Aginode is committed to minimizing the impact on the environment of its activities and its products and offering solutions contributing positively to the global environmental and energy issues (rise of energy demand, increase in mobility needs, climate change, urbanization, resources scarcity...). The Group is committed to ensuring the safety of installers, operators and users of infrastructures, buildings, means of transport, equipment and machines equipped with its cables and cabling systems.

1. Protection of the environment

Regardless of where we operate, we strive to reduce the impact of our activities on the environment through risk and accident prevention measures, by controlling our consumption and managing carbon footprint and pollution risks. We must each make our own contribution according to our function by:

- the strict application of all regulatory obligations as well as Group obligations regarding the environment,
- taking all necessary measures to implement the Group's environmental management system (described in the Environmental Roadmap) and contributing to improving the results,
- participating in energy saving programs and reducing consumption through raw materials programs, and managing pollution risks (prevention and control).

The Group's environmental roadmap is available on the website.

2. Product responsibility

The trust of our customers is based primarily on the quality and safety of our products. We must all contribute to this. Each of us, depending on our responsibilities, must:

- Comply with regulatory and internal standards, favoring the most demanding ones in terms of safety,
- Ensure the strict application of quality controls at each stage of production; quickly report or react to any quality problem in order to correct it,
- Ensure that the technical documentation and installation and safety instructions that accompany our products are perfectly clear to prevent any risk of accidents,
- Take into account all safety or quality problems reported by installers and customers.

We work closely with our customers to develop sustainable cabling solutions to transport energies and data efficiently and safely. Aginode aims to improve the quality of life of all the final users.

We strive to satisfy our customers to the extent possible by providing them with accurate information about the composition of our products and their environmental impact throughout the life cycle.



Safeguarding information and assets.

Aginode respects the private life of its employees and does not interfere in their conduct outside the workplace.

1. Protection of company resources

We must all act with integrity, vigilance and common sense to ensure that the Group's resources and opportunities are not misappropriated, wasted, lost, damaged, misused, theft or infringed. These resources include worktime, intangible assets and confidential information.

All equipment, information, ideas and data that you use or to which you have access in your work belong to the Group or its partners. The Group's resources must be used solely for professional purposes. The same is true for opportunities identified as part of your duties.

2. Compliance with confidentiality rules

Intellectual property, industrial know-how, strategic analyses and plans, financial, technical and commercial information and all confidential information are highly valuable assets and the Group could suffer considerable damage if they were disclosed without authorization.

All confidential information, and particularly data regarding customers and suppliers, must be kept secure and returned upon departure from the Group.

We must avoid discussing or working on confidential information in public places where conversations can be overheard and the safety of the data can be compromised.

3. Third party's intellectual property

The Group respects the intellectual property and protected information of third parties.

Confidential information belonging to a third party can only be used under an agreement approved by the Legal Department.

The loading of unlicensed software onto the Group's computers is prohibited.

4. Data Protection Privacy

The loss or misuse of personal data may bear substantial adverse consequences for individuals concerned. Fully aware of its responsibility, Aginode Group and its employees are committed to protect personal data of employees, clients or any third party. In addition, Aginode commits to protect the enforcement of rights by such individuals pursuant to the European Union Data Protection Regulation ("GDPR") and applicable national or local laws and regulations.

In this framework, Aginode collects and processes personal data for legitimate purposes only and ensures, through appropriate technical and organization measures, that such data is protected against loss, modification, misuse or unauthorized disclosure.

To this end, Aginode has issued a GMP25 - Personal Data Protection Policy (**GMP 25 under review**) which applies to all Group entities worldwide and establishes principles and guidelines



that shall govern data processing, in particular for those employees whose functions within the Group may involve personal data processing.

Whistleblowing System SpeakUP.

Any Aginode employee (current and former) and other external stakeholder, either individuals or legal entities, of the Aginode Group (e.g.: local community, shareholders, customers, suppliers) any third party, may report a suspected compliance breach of the Code of Ethics & Business Conduct or any legal obligation directly to the Group Ethics Correspondents through the online Whistleblowing System SpeakUp made available by the Group (phone line available as well), which can be found under the following address:

- Via the link: <https://aginode.speakup.report/Aginode>
- Or via the phone lines available (see Annex 1)

The online Whistleblowing System SpeakUp is also available on the Group's website, on main search, or through the Group's sharepoint page accessible to all employees.

Local hotlines offering a local language service have been set up to cover a large number of countries where the Group operates. Local phone numbers are displayed on the online platform.

Group employees may also use other existing reporting channels in the Group such as hierarchical management or Human Resources contacts.

The Whistleblowing Policy describes the process to file an alert report, and the ways the reporter is protected when speaking (confidentiality, anonymity, non-retaliation).



Annex 1 - Aginode whistleblowing phone lines

How to speak up via the phone?

1. Dial the phone number of the country you are located in on your phone (see chart below).
2. The phone prompt will ask you to enter Aginode organisation code: **124107**.
3. Then, you will be asked to choose a language.
4. The phone will prompt:
 - a. If you already have a report, press 1.
 - b. To create a new report, press 2.
5. Stay on the line to leave a new message and follow the instructions of the phone prompt.
6. Leave a voice message (7 minutes maximum) then hang up the phone.
7. Your message will then be transcribed and/or translated then sent to Aginode's Ethics Correspondents in Speak Up.

Aginode whistleblowing phone lines per country

Country	Phone number	Phone instructions
Albania	0035545301801	Number: +355 4 530 1801 Call charged at local rate
Algeria	00213983299338	Number: +213 983 29 93 38 Call charged at local rate
Angola	00244226425610	Number: +244 226 425 610 Call charged at local rate
Anguilla	18334222005	Freephone: 1833 422 2005
Antigua and Barbuda	18334222006	Freephone: 1833 422 2006
Argentina	00541120397280	Number: +54 11 2039 7280 Call charged at local rate
Australia	0061282846262	Number: +61 2 8284 6262 Call charged at local rate
Austria	0800909683	Freephone: 0800 909 683
Bahamas	18334222007	Freephone: 1833 422 2007
Bahrain	0097316501936	Number: +973 1650 1936
Bangladesh	008809610998462	Freephone: +880 (0) 9610 998462



Barbados	0012466239631	Number: +1 (246) 623 9631 Call charged at local rate
Belarus	882004910089	Freephone: 8 820 0491 0089
Belgium	080089326	Freephone: 0800 89 326
Belize	18000130076	Freephone: 1800 0130 076
Benin	0022920900380	Number: +229 20 90 0380 Call charged at local rate
Bermuda	18334222008	Freephone: 1833 422 2008
Bhutan	009752379003	Freephone: +975 2 379 003
Bolivia, Plurinational State of	800105122	Freephone: 800 105 122
Bosnia and Herzegovina	0038770330093	Number: +387 70 330 093 Call charged at local rate
Botswana	8007861103	Freephone: 800 786 1103
Brazil	00551147008838	Number: +55 (11) 4700 8838 Call charged at local rate
Brunei Darussalam	8014657	Freephone: 801 4657
Bulgaria	8002100645	Freephone: 800 210 0645
Burkina Faso	0022625300982	Number: +226 25 30 09 82 Call charged at local rate
Cambodia	1800209867	Freephone: 1800 209 867
Cameroon	00237657103112	Freephone: +237 6 57 10 31 12
Canada	0015143950496	Number: +1 (514) 395 0496 Call charged at local rate
Cayman Islands	0013457695580	Number: +1 (345) 769 5580 Call charged at local rate
Chile	0056224835917	Number: +56 22 483 5917 Call charged at local rate
China	4001201842	Country wide number with no supplier restriction: 400 120 1842 Call charged at local rate.
Colombia	00576012421247	Number: +57 601 242 1247 Call charged at local rate
Costa Rica	0050640360350	Number: +506 4036 0350 Call charged at local rate
Côte d'Ivoire	002250566770918	Freephone: +225 05 66 77 0918



Croatia	08007745	Freephone: 0800 7745
Cyprus	80091142	Freephone: 800 91142
Czechia	800050833	Freephone: 800 050 833
Denmark	004543310961	Number: +45 43 31 09 61 Call charged at local rate
Dominica	18334221998	Freephone: 1833 422 1998
Dominican Republic	0018299471996	Number: +1 (829) 947 1996 Call charged at local rate
Ecuador	1800001432	Freephone: 1800 001 432
Egypt	08000000083	Freephone: 0800 000 0083
El Salvador	0050322304752	Number: +503 2230 4752 Call charged at local rate
Estonia	003726093008	Number: +372 609 3008 Call charged at local rate
Ethiopia	800861919	Freephone: 800 86 1919
Fiji	008002650	Freephone: 008 002 650
Finland	0800392912	Freephone: 0800 392 912
France	0805543753	Freephone: 080 554 3753
French Guiana	0800991448	Freephone: 0800 99 1448
French Polynesia	0800914886	Freephone: 0800 91 4886
Georgia	1800008013	Freephone: 1800 008 013
Germany	08001818952	Freephone: 0800 1818 952
Ghana	00233596993553	Number: +233 59 699 3553 Call charged at local rate
Greece	0080044145924	Freephone: 0080 0441 45924 Can only be connected by Cosmote mobile and OTE landline
Grenada	0014732300333	Number: +1 (473) 230 0333 Call charged at local rate
Guam	18338096777	Freephone: 1833 809 6777
Guatemala	0050223028459	Number: +502 2302 8459 Call charged at local rate
Honduras	80027916139	Freephone: 800 2791 6139



Hong Kong	0085230194193	Number: +852 3019 4193 Call charged at local rate
Hungary	0680984589	Freephone: 06 809 845 89
Iceland	003544150349	Number: +354 415 0349 Call charged at local rate
India	0008000503159	Freephone: 0008 0005 03159
Indonesia	00622180630074	Number: +62 21 8063 0074 Call charged at local rate
Ireland	1800800636	Freephone: 1800 800 636
Israel	0097233741225	Number: +972 3374 1225 Call charged at local rate
Italy	800147694	Freephone: 800 147 694
Jamaica	0018766779125	Number: +1 (876) 677 9125 Call charged at local rate
Japan	0081366270734	Number: +81 3 6627 0734 Call charged at local rate
Jordan	080023801	Freephone: 0800 23801 No mobile access
Kazakhstan	007877273574582	Number: (+7) 877 2735 74582 Call charged at local rate; No mobile access
Kenya	00254207650957	Number: +254 20 765 0957 Call charged at local rate
Korea	0082237005146	Number: +82 2 3700 5146 Call charged at local rate
Kuwait	0096522055730	Freephone: +965 2205 5730
Latvia	80005929	Freephone: 800 05929
Lebanon	8338160913	Freephone: first dial 01-426-801 and then 833 816 0913
Lithuania	880030366	Freephone: 8800 30366
Luxembourg	003523420808982	Number: +352 342 080 8982 Call charged at local rate
Malaysia	0060377243136	Number: +60 3 7724 3136 Call charged at local rate
Malta	80065144	Freephone: 8006 5144
Martinique	0800901651	Freephone: 0800 90 1651



Mauritius	0023052970999	Number: +230 5 297 0999 Call charged at local rate
Mexico	00525547806198	Number: +52 55 4780 6198 Call charged at local rate
Moldova, the Republic of	080060016	Freephone: 080 060 016
Morocco	00212530144108	Number: +212 5 30 14 41 08 Call charged at local rate
Myanmar	08008008062	Freephone: 0800 800 8062
Namibia	00264833800103	Freephone: +264 83 380 0103
Nepal	18000010186	Freephone: 1800 001 0186
Netherlands	0031107007503	Number: +31 10 700 75 03 Call charged at local rate
New Zealand	006499135892	Number: +64 9 913 5892 Call charged at local rate
Nicaragua	0050575137610	Number: +505 7513 7610 Call charged at local rate
Nigeria	07080601221	Freephone: 070 8060 1221
North Macedonia	0038925513216	Number: +389 2551 3216 Call charged at local rate
Norway	004724140601	Number: +47 24 14 06 01 Call charged at local rate
Oman	80074161	Freephone: 8007 4161
Pakistan	0080090044437	Freephone: 0080 0900 44437
Panama	005073084480	Number: +507 308 4480 Call charged at local rate
Papua New Guinea	000861322	Freephone: 0008 61322
Paraguay	0098004410266	Freephone: 0098 0044 10266 No mobile access
Peru	080074535	Freephone: 0800 74535
Philippines	180083948474	Freephone: 1800 8394 8474 Can only be connected by Globe Telecom device
Poland	800012953	Freephone: 800012953
Portugal	800831302	Freephone: 800 831 302
Puerto Rico	0017872007305	Number: +1 (787) 200 7305 Call charged at local rate



Qatar	00800101094	Freephone: 00800 101 094
Réunion	1800916980	Freephone: 1800 916 980
Romania	0800400653	Freephone: 0800 400 653
Russian Federation	88001006994	Freephone: 8 (800) 100 69 94
Saudi Arabia	8008501433	Freephone: 800 850 1433
Serbia	0038110520043	Number: +381 10 520 043 Call charged at local rate
Seychelles	800131	Freephone: 800 131
Singapore	006564037051	Number: +65 6403 7051 Call charged at local rate
Slovakia	0800113418	Freephone: 0800 113 418
Slovenia	080083115	Freephone: 0800 83115
South Africa	0027214277937	Number: +27 (21) 427 7937 Call charged at local rate
Spain	0034900031156	Number: +34 900 031 156 Call charged at local rate
Sri Lanka	0094720910370	Number: +94 (72) 091 0370 Call charged at local rate
Sudan	00249156559883	Freephone: +249 15 655 9883
Suriname	8338160919	Freephone: 833 816 0919
Sweden	0201604703	Freephone: 020 160 4703
Switzerland	0800005691	Freephone: 080 000 5691
Taiwan, Province of China	00886277438912	Number: +886 2 7743 8912 Call charged at local rate
Tanzania, the United Republic of	0800111020	Freephone: 0800 11 1020
Thailand	006628449693	Number: +66 2 844 9693 Call charged at local rate
Trinidad and Tobago	0018682241869	Number: +1 (868) 224 1869 Call charged at local rate
Tunisia	0021631300338	Number: +216 31 300 338 Call charged at local rate
Turkey	00800448828602	Freephone: 0080 04488 28602
Turks and Caicos Islands	18334621355	Freephone: 1833 462 1355



Uganda	00256414238162	Number: +256 41 423 8162 Call charged at local rate
Ukraine	0800801205	Freephone: 0800 801 205
United Arab Emirates	80004440408	Freephone: 800 0444 0408
United Kingdom	08000224118	Freephone: 080 0022 4118
United States of America	0016692887154	Number: +1 (669) 288 7154 Call charged at local rate
Uruguay	000415985762	Freephone: 0004 1598 5762
Venezuela, Bolivarian Republic of	00582123357722	Number: +58 212 335 7722 Call charged at local rate
Viet Nam	008419003271	Number: +84 1900 3271 Call charged at local rate
Virgin Islands (British)	18334621356	Freephone: 1833 462 1356
Virgin Islands (U.S.)	18337246398	Freephone: 1833 724 6398
Zimbabwe	002638677422010	Freephone: +263 867 742 2010