

SIAPARTNERS

Code of Conduct.

CONSULTING
FOR GOOD



Foreword.

Sia Partners' success relies on the behavior of our people. In line with our Consulting for Good approach to Corporate Social Responsibility, we are committed to fostering a culture of ethics that is anchored in our values. This Code of Conduct outlines the role of each of our stakeholders therein.

This Code of Conduct is an everyday guide, designed to govern our behavior in alignment with our core values. It is to be signed by all Sia Partners employees during onboarding, and should be consulted often, in order to guide our thinking and actions and provide the tools to ensure that we all contribute to building trust within the firm. At Sia Partners, we are especially committed to battling all forms of corruption or bribery.

The scope of this Code of Conduct is global; it applies to the entirety of our workforce in all geographies, as well as our contractors and business partners. Practices and expectations outlined herein relate to safety, integrity, and respect for human and labor rights and the environment. As signatories of the United Nations Global Compact, these practices are part of a larger commitment to support the UN Sustainable Development Goals and the Ten Principles of the Global Compact as they pertain to human rights, labor, the environment, and anti-corruption and anti-bribery. In addition to the practices outlined in this Code of Conduct, all Sia Partners locations are expected to comply with local laws and regulations.

We believe that it is within a culture rooted in trust that we do our best work. By aligning ourselves with this Code of Conduct, we hold ourselves accountable in our commitment to build trust and uphold a global culture of ethics.

Matthieu Courtecuisse

CEO

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About the Code of Conduct.

OUR VALUES

This Code of Conduct is built on six core values, which shape how we think, behave, and conduct business. Each of our values is accompanied by a set of tenets, which illustrate how the values concretely apply within Sia Partners' culture.

Excellence

We strive to deliver superior value and tangible results for our clients by leveraging our expertise and empowering our people. We are committed to raising the bar for ourselves and our industry, which is why we recruit top talent and provide the tools and career support they need to thrive and excel. Our commitment to excellence drives our business and has ensured the trust of our clients.

Tenets

- We recognize that the superior quality of our Client Delivery is the lifeblood of our firm.
- We are committed to gaining the trust of our clients to generate repeat business.
- We are treated as business leaders, and in turn we treat business and its resources as a leader would.
- We are committed to improving ourselves as individuals and as businesspeople.

Entrepreneurship

Entrepreneurship is a cornerstone of our firm; the drive to grow has been a constant since our founding. This inspires a working environment that encourages the resourcefulness, risk taking, and tenacity required to transform original and cutting-edge ideas into action. Our entrepreneurial spirit emboldens us to confidently meet the challenges of tomorrow, continuously building legitimacy vis-à-vis our clients and influencing the ecosystems in which we operate.

Tenets

- We understand that we reap what we sow. Great reward comes with great investment and risk sharing.
- We shape the client acquisition and retention process around ideation and outside-the-box thinking.
- We know that the ideas of today are the projects of tomorrow, and that ideas are only effective if shared.
- We view challenges as opportunities for bold, audacious action, which leads to reinventing the ecosystem in which we operate.
- We take the initiative and are not afraid to make mistakes.

Innovation

We are convinced that, in order to deliver superior value to our clients, innovation takes center stage. As a result, our work culture lends itself to anticipation and divergent, outside-the-box thinking, which drives our investment and positioning beyond traditional consulting.

Tenets

- We use cutting-edge technologies and new ways of working to position ourselves beyond traditional consulting.
- We seize trends we observe in the field to generate optimal solutions.
- We operate in a manner that is based on anticipation, developing a sense of go-to-market and keeping it at the fore.
- We support innovation in our communities through local partnerships and open innovation contests.



Teamwork

We believe that creating a sense of community is a key to success, that working together enables us to achieve our greatest potential, at once as individuals and as a firm. We therefore aim to cultivate a global culture of sharing: exchanging ideas and resources, sharing in success, and building each other up across working groups, business units, and geographies.

Tenets

- We build up our communities by sharing our expertise, giving credit where it's due, and bringing positive energy to all our interactions.
- We hold ourselves and others accountable for the commitments we make to one another.
- We respect one another by not creating unnecessary work, by asking for support when needed, and by keeping each other informed about any absences.
- We endeavor to collaborate across working groups, business units, and geographies.
- We understand that, in order to combat the silo mentality, collaboration and content sharing are critical.

Care & Support

There is no one-size-fits-all in career development and wellbeing. We value our talent, and believe that individuality and diversity are key to supporting growth. This is why we have rejected the "up and out" model in favor of a more flexible, tailored approach, proposing an array of possible career paths and opportunities for internal engagement. We strive to cultivate an inclusive and supportive environment in which all are encouraged to be their authentic selves and given the flexibility to pursue a meaningful career. By supporting our people in this way, we empower them to explore new ways of thinking, propelling us all forward.

Tenets

- We are committed to improving ourselves as individuals and as businesspeople, and to helping our colleagues grow.
- We understand that a culture of inclusion is crucial for individual and collective wellbeing and success, and we act accordingly.
- If we witness, or are the victim of, discrimination, we speak up and we are heard.
- We strive to behave in a way that encourages diversity, equity, inclusion, and belonging, knowing that we can respect different opinions and find common ground.

Employee Wellbeing

We know that a supportive environment and healthy work-life balance are crucial for wellbeing and productivity, so we foster a work culture that promotes inclusion, wellness, and community. Our flexible policies and emphasis on local markets allow our employees to pursue ambitious career progression with minimal business travel, while maintaining a rich personal life. At the end of the day, our goal is to empower our people to be their best selves, at work and beyond.

Tenets

- We work efficiently in order to pursue goals and aspirations outside the office.
- We remember that work should be fulfilling.
- We understand that, where local markets and operating models permit, business travel is voluntary.*
- We acknowledge that we are all humans who make mistakes and have ups and downs. Thus, we let our superiors know if we are struggling, and support others with empathy and grace.

**Business travel is necessary for consultants in our Middle East locations. Expectations with respect to travel are outlined in employee contracts.*



BUILDING BUSINESS RELATIONSHIPS BASED ON TRUST

This Code of Conduct is part of a fundamental objective to build and maintain business relationships with our stakeholders that are based on trust.

• Clients

We are committed to strengthening our relationships with our clients. We respect and protect their internal rules and regulations, including codes of conduct, where they apply to consulting.

We are also committed to fostering relationships of transparency and trust. As a result, when necessary, we are prepared to bring challenging situations or unwelcome information to light.

• Employees

As outlined throughout this Code of Conduct, the welfare of our employees is a top priority for Sia Partners. We support our employees. Any attempt to subject them to unfounded pressure or threaten their integrity, whether internally, by a client, or by

another third party, will not be tolerated. We believe that, in order for our employees to deliver value, we must cultivate a working environment characterized by respect and trust.

• Third Parties

Sia Partners promotes equity and the protection of human rights, and believes that these values should be at the heart of our relationships with suppliers. Arbitration for the purchase of goods and services from suppliers is based on criteria defined in our Responsible Purchasing Charter. This charter outlines Sia Partners' commitment to our suppliers: fair operating practices, ethical behavior, and transparency.

It also holds our suppliers accountable. We require that our suppliers and subcontractors comply with our regulations and procedures, as well as those of our clients, and that their practices respect labor and human rights, due diligence, and all national and international regulations.

Sia Partners is an independent consulting firm fully owned by its Partners. This independence confers freedom in the strategic choices of our group and guarantees objectivity in the conduct of our business. This allows us to maintain the entrepreneurial spirit with which we were founded.

INTENDED USERS

This Code of Conduct is published on the Sia Partners website and intranet, and is integrated into the onboarding of all new employees. We expect all of our teams to understand and heed the content of this Code of Conduct.

• Employees

Upon their arrival, each of our employees is familiarized with this Code of Conduct in order to understand and assimilate Sia Partners' values and culture. The behavior our employees exhibit at work has an impact on Sia Partners' image. It is each employee's responsibility to ensure that all the principles described within this Code of Conduct are respected. Our employees are also expected to provide regular feedback to help ensure that this Code of Conduct is accessible and applicable.

• Managers

Sia Partners is committed to training and supporting managers so that they are able to manage their teams as well as possible in all situations. No manager is perfect, but respect and accessibility are principles we require all managers to uphold vis-à-vis their employees. We expect our managers to keep an 'open door policy' and to listen when employees raise concerns. We expect their behavior to be exemplary.

• External Stakeholders (clients, suppliers, contractors, business partners, and so forth)

The principles described in this Code of Conduct also apply to internal and external stakeholders. All persons working in connection with Sia Partners must align with the principles outlined herein.

We are committed to respecting the values and principles upheld by our external stakeholders. Given the nature of consulting, a willingness to assimilate different corporate cultures and ways of working is inherent to how our consultants should conduct business.

UNDERSTANDING THE LEGAL FRAMEWORK THAT UNDERPINS OUR ACTIONS

We comply with all laws, whether local, national, regional, or international.

All of our employees are expected to behave in a way that is legal and in compliance with the standards of our profession. As an international company, we take our global responsibility very seriously.

Our international presence requires us to be aware of the legal and cultural specificities of each of the countries in which we operate. Because the parent company, Sia Partners, is based in France, there are a number of French laws and industry standards to which this Code of Conduct adheres; a non-exhaustive list can be found in the appendix section. Additional local laws and regulations are taken into account onsite. Please refer to your HR managers for more information.

Sia Partners is prepared to cooperate in the event of any legal investigation, whether internal to the company or external.

Speaking up.

WHY IS IT IMPORTANT?

Speaking up is vital to maintaining an environment of trust, safety, and wellbeing for all our employees.

As a company, we have legal obligations towards our employees and in order to fulfill them, leadership needs to be alerted in the event of a breach. Our managers are trained to identify and report challenging situations, but it is important for all our employees to know that their voices are valued and heard.

Of course, this is above all a human issue. The wellbeing of Sia Partners employees and the trust they place in leadership are key to the balance and continued success of our company.

With this Code of Conduct, we affirm to our employees that they are free to speak, and should they voice concerns, they will be met with support.

How to make decisions

If you find yourself hesitating to make a decision or take action, whatever the context, ask yourself the following questions:

- *Is it against the law or standards of our profession? (See resources)*
- *Is it violating Sia Partners' Code of Conduct?*
- *Does it contradict Sia Partners' values?*
- *Does it breach an obligation to a client or any other third party?*
- *Is it causing harm?*
- *If I explained my decision to a third party, would they agree with the action I have taken?*

If in doubt, don't hesitate to ask your supervisor or HR representative

HOW TO RAISE CONCERNS?

If you believe that an employee, potential recruit, or other stakeholder is violating the law, this Code of Conduct, or other internal guidelines, you are expected to take action. You have an obligation to that person, your colleagues, our recruits, and Sia Partners to immediately prevent, rectify, or report this situation by using the following procedure:

1. If the situation is not breaking the law and does not endanger anyone, try to solve the problem yourself. Speak with the person concerned and insist that they stop the behavior in question.
2. In lieu of, or in addition to, step one, contact your supervisor or HR representative. In most cases, it is advisable to first speak up to your direct supervisor. Most problems can be solved with their help.
3. Contact relevant specialists. Contact your local human resources representative for all questions relating to working conditions. You may also contact employee representatives (e.g. the CSE in France) in cases of harassment or discrimination.
4. **If the above steps do not resolve the issue or if you prefer not to use the contacts listed above, you can use the Grievance & Whistleblowing Procedure. This procedure aims to identify and prevent illegal, unethical, or otherwise problematic practices.**

For serious situations that directly affect a person's integrity, we encourage you to prioritize the Grievance & Whistleblowing Procedure so that Sia Partners may react as quickly as possible.

Grievance & Whistleblowing Procedure

This Grievance & Whistleblowing Procedure covers situations in which an individual wants to raise a concern about a risk of breach of this Code of Conduct, any internal policy or process, or any law that affects the firm or its employees notably in the following areas:

- Suspicious conduct or transactions (fraud, money laundering, theft, bribery, corruption)
- Inappropriate workplace behavior (harassment, discrimination, bullying)
- Work health and safety
- Damage to the environment

A grievant or whistleblower can be any employee, external partner, or provider with whom Sia Partners maintains an established commercial relationship (subcontractors or suppliers). Sia Partners takes all feedback very seriously and commits to taking the time to thoroughly investigate in order to handle the issue with respect and fairness.

For staff, a dedicated procedure is available to all Sia Partners employees. This procedure is outlined below, and on the Sia Partners intranet and website.

A number of precautions will be taken by the persons handling the grievance or alert to verify whether or not it is legitimate. The persons who receive a grievance or alert will know the grievant's or whistleblower's identity and will have the duty to keep it anonymous. If other parties need to be involved, this person will anonymize the grievant or whistleblower's request (see confidentiality section).

How a grievance or alert is investigated is determined on a case-by-case basis. In all cases, Sia Partners is committed to handling the grievance or alert in a timely manner and providing feedback to the grievant or whistleblower.



Procedure to follow

For internal stakeholders

Fill out the dedicated form (on Sia Partners' intranet)

For external stakeholders

The report must include the following:

- Full name of the grievant or whistleblower
- The entity to which the grievant or whistleblower belongs
- Details of the grievance or alert and, in particular, the nature of the facts set forth in the report

The report can be sent via the form available on the CSR page of our website.

In the case of an emergency in which someone is in immediate danger, the grievant or whistleblower should prioritize calling in appropriate, immediate help, like medical aid or law enforcement.

Confidentiality of all parties.

The grievant or whistleblower must meet three conditions:

- To act in the general interest or in their personal interest;
- To act in good faith, with no intention to harm;
- To have had personal knowledge of the facts put forth.

Sia Partners protects grievants and whistleblowers, in particular against potential acts of retaliation or disciplinary sanctions.

The identity of the grievant or whistleblower is known only to two referents: Alix de Guibert, Group CFO, & Sandrine Carreau, Head of the Marketing & Corporate Development department. Grievants or whistleblowers may choose which referent to contact, or may elect to contact both. When the referents request the assistance of other internal roles at Sia Partners, they ensure that the identity of the grievant or whistleblower is anonymized.

Any possible identifiers that could single out the grievant or whistleblower will never be disclosed without their explicit consent, except to legal authorities.

Working at Sia Partners.

HEALTH & SAFETY

The physical and mental health and safety of our employees is a top priority. We are committed to ensuring the safety of our people and supporting their physical and mental health. To this end, we provide a working environment designed to reduce physical stresses and strains and promote wellbeing, and make available training on relevant best practices.

Concerning health issues, adequate nutrition, sleep, and physical activity are major challenges and the focus of numerous public health campaigns. Sia Partners aims to encourage initiatives that help reduce health risks for our employees.

Examples:

Sia Partners pledges to:

— Ensure the physical safety of its people and effectively support them in cases of emergency;

Safety procedures are key in ensuring the safety of our teams. All employees must know and comply with their office emergency procedures. They should also participate in emergency evacuation drills.

As our consultants often work off-site with clients, it is mandatory that they familiarize themselves and comply with local safety and security procedures (e.g., location of emergency exits, evacuation meeting points, and so forth).

— Adapt the workplace environment;

Musculoskeletal disorders (MSDs) can be defined as a set of periarticular conditions that can affect various structures of the upper and lower limbs, or of the back: tendons, muscles, joints, nerves, and the vascular system.

MSDs constitute a variety of conditions with diverse and often multiple causes, which are exacerbated by stress. They are one of the most worrying issues in occupational health due to their increasing prevalence and effects on individuals in terms of suffering, reduced ability, risk of disruption to work. Although the consulting profession does not entail too many physical challenges, Sia Partners is committed to making necessary adaptations within its offices and in the daily professional life of its employees. To help our employees adapt to a profession that is largely sedentary, we encourage our employees to adopt healthy posture and thus avoid musculoskeletal disorders.

— Be attentive to psychosocial risks, like burn-out, alcoholism, or anxiety, and apply appropriate methods to identify and manage them.

We ask our managers and employees to create an environment of trust to prevent the above risks. If an employee feels the beginnings of burnout, for instance, they should know that they can speak up and will be supported. We offer several avenues for feedback, like your manager or HR representative. Employees will be advised depending on their individual situation.

Focus: How to identify symptoms of burnout?

Burnout is a state of physical and mental exhaustion linked to the deterioration of a person's relationship with work. It is the second most common work-related illness, after MSD.

What are the typical symptoms?

- Emotional, physical, and mental exhaustion. You have the feeling of being drained. The usual rest periods (sleep, weekends, holidays, etc.) are no longer sufficient to relieve this fatigue.

- You develop a cynical attitude at work. This mechanism allows you to protect yourself from emotional disappointment from your work. The result can be harsh, negative behavior.

- *Additional symptoms are self-deprecation, loss of a sense of accomplishment at work, the impression of no longer being up to the task.*

It is crucial for employees, especially managers, to be vigilant and offer support for peers who may be suffering from burnout. If employees notice that a colleague appears to be burned out, they should talk to them and ask how they might help. If necessary, an alert should be raised with their manager or HR.

What are the causes?

There can be multiple causes of burnout: being overloaded with work, being under pressure to meet very short deadlines, lack of control over your work, receiving little recognition, suffering from inequity, receiving conflicting orders, having unclear objectives imposed on you, having insufficient resources, facing a conflict of values, a toxic or unsupportive work environment, or even experiencing job insecurity.

Tools provided by Sia Partners

- *Stress management training*
- *Training for managing complex situations*
- *Online questionnaires during times of crisis to identify the level of risk for each individual*
- *Psychological support integrated into health plans. (Available in most locations. Check with local HR.)*

— Encouraging healthy food choices and physical activity

We expect our managers to encourage, as much as possible, initiatives that promote health and safety. Concretely, managers must ensure that their teams have work rhythms that do not prevent them from enjoying a balanced diet and regular physical activity.

Examples of tools provided by Sia Partners

- *Gym facilities (Paris)*
- *Delivery of fresh and organic food on a regular basis*
- *Partnerships with food delivery services*

TRAINING AND CAREER DEVELOPMENT

Training and career development are crucial for our employees to perform their jobs effectively, develop new skills, take on new responsibilities, and evolve in their careers, whether within Sia Partners or with another organization.

We believe that our people work best in a culture characterized by trust and empowerment; we are committed to fostering such a culture.

In our flexible approach to professional development, we provide tailored career paths and an array of training modules so that our people can grow their skills and increase their employability in a way that suits them.

We empower our employees to take responsibility for their training by making online modules available to them via our 360Learning platform. This ATAWAD (anytime, anywhere, any device) principle allows our employees to train at their own pace. During onboarding, new joiners learn to use 360Learning, and are presented the full catalog of training modules available to them.

Managers are trained to assist employees in their career development via regular meetings and annual evaluations.

*Focus: I'd like to see a new training module on 360Learning platform, Sia Institute.
What should I do?*

Talk to my manager or the person in charge of Sia Institute, explain my needs, and understand how to respond to them. And if I think I might like to participate in its creation, I can explain the importance of such a training module to the Sia Institute manager, and use the tools at hand to launch it.

— Regular follow-up on employees' career evolution

We expect our managers to help their team members assess their career development by providing regular updates and feedback. Annual appraisals are a typical opportunity to do so.

Our managers must also set an example by taking the time to follow career-structuring training courses. We also expect them to maintain regular contact with consultants during their assignments.

We expect all employees to communicate their contributions at the end of each project to allow their superiors and HR teams to assess them in a fair and timely manner.



OPEN DIALOGUE

Open dialogue describes a situation in which all parties are encouraged to share their ideas or feelings freely.

Sia Partners aims to create and maintain a safe and open work environment. We pay careful attention to the quality of employee dialogue within the company: every employee should be heard and should not be afraid to speak up, regardless of the issues or people concerned (*see [Speaking up](#)*). The group encourages social dialogue and the exercise of trade union rights.

Examples:

In order to respect the open dialogue principle in the company, our leaders must be present and willing to listen. They need to be interested and open-minded.

We also expect our employees to use the different communication channels at hand in order to make themselves heard. Concretely, our employees are encouraged to attend different events which provide the opportunity to share opinions on a given topic (local townhalls, Q&A sessions with the management team, and so forth). They are also expected to take the time to provide feedback when it is asked of them.

In each country, initiatives have been created to concretely apply the open dialogue approach:

- Our Sia Ideas contest, a global internal innovation challenge, has been launched annually for the past several years. The purpose of this challenge is to provide an opportunity for our consultants to pitch new ideas to a panel of Partners.
- In Belgium, a digital idea box has been set up to constantly collect ideas and suggestions for improvement from all employees. Managers are committed to regularly reviewing the ideas put forth.

The principle behind these initiatives is always the same: ensuring that our people can make their voices heard.

PRESENCE AND AVAILABILITY

The consulting profession is results-oriented. As such, Sia Partners expects all employees to adapt their presence to their actual workload. In other words, Sia Partners is committed to an anti-presenteeism policy: the objective is not simply to be present, but to be effective and adaptive to the needs of our clients.

Sia Partners is committed to total transparency vis-à-vis our clients with regards to employees' billable hours, providing thorough activity reports.

Examples:

- In order to deliver real added value to our prospects or clients, each employee must be able to adapt to the workload. If a call for tenders has to be issued by a certain deadline, we expect our teams to do their utmost to convey Sia Partners' capabilities within the time limit.

If the team is overloaded, we expect our people to act quickly to find a solution, like soliciting help from colleagues.

- A manager cannot reprimand an employee who leaves early on a given day if the work is done. Conversely, our employees are encouraged to leave the office once their work is finished at the end of the day.
- We do not expect our employees to stay late every evening in our offices. Physical presence is not proof of commitment to Sia Partners.
- We expect each of our employees to complete their activity reports (weekly or monthly, depending on the needs) within the allotted time. This allows Sia Partners to have a better grasp of its activity and allows our clients to effectively follow-up on contracts.

WORK-LIFE BALANCE

Between the desire to succeed and the risk of over-investment, reconciling professional and private life is difficult.

We do not expect our employees to always be reachable. We are committed to enforcing legal break periods (evenings, weekends, holidays), but beyond that, we expect our managers to help employees to respect and enact healthy boundaries between their work and personal lives.

Still, we recognize that sometimes there are emergencies or urgent needs which must be met to ensure the continuity of a project. In such cases, taking initiative and committing to get the job done is something we value among our employees. But in the day-to-day management of our employees, everything must be done to help them maintain balance between their professional and personal lives.

Examples:

Managers are asked not to send emails outside working hours unless the matter is urgent.

Every manager also has to set an example. For instance, they should be careful not to present an image of a life consumed by work. This is important in order to ensure that employees develop a healthy work-life balance and feel encouraged to move up the ladder within Sia Partners. Taking on more responsibility within Sia Partners should not be synonymous with giving up one's private life.

DIVERSITY & INCLUSION

Sia Partners promotes inclusion and equal opportunities. In accordance with Sia Partners commitments, each of our entities encourages diversity and refrains from practicing any form of discrimination whatsoever with regard to its staff and job applicants.

Sia Partners promotes the fair treatment of candidates in the recruitment process, basing judgment on objectively assessed competencies and skills, ensuring equal opportunities are awarded, and defining working conditions and compensation in a fair and equitable way.

Sia Partners is eager to advance and promote diversity within our own firm, for our clients, and in society more broadly. We are also committed to fostering an inclusive culture, in which each employee feels a sense of respect and belonging, regardless of sex gender, age, socio-economic status, race, language, beliefs, sexual orientation, physical or mental capacities or conditions, familial or marital status, or lifestyle.

Examples:

We expect our leadership to promote diversity and inclusion. To this end, we require management worldwide to complete dedicated training sessions. Additional eLearning modules are mandatory for leadership and all staff.

In order to move toward a more diverse and inclusive culture and support recruitment, employee engagement, development, progression, and the retention of diverse talents, we encourage diverse performance models and leadership styles. Sia Partners' top management is encouraged to vocally promote diversity and inclusion, whether as sponsors of D&I initiatives, dedicated role models, or simply in support of Sia Partners' culture.

One of the ways we strive to unite our workforce around diversity and inclusion is via DEIB (Diversity, Equity, Inclusion & Belonging) @Sia Partners, our dedicated global internal network. This network unifies our people worldwide so that we may support and learn from local diversity & inclusion efforts across our offices. The goal of DEIB @ Sia Partners is to cultivate visibility and solidarity in order to advance global D&I objectives and nurture a sense of community. Global focus areas include gender, LGBTQ+, disabilities, and working parents. Areas like race and ethnicity are also central at some Sia Partners offices, notably in the UK and the US.

Our Human Resources teams are committed to optimizing our talent strategies and processes to build a more diverse workforce. One way we do this is by making job ads more inclusive by filtering out gender-coded language to remove gender bias.

HR teams further ensure the gender diversity of interviewers throughout the recruitment process, and interviewers are trained to assess candidates in a manner that is nondiscriminatory.

FIGHTING AGAINST DISCRIMINATION

Sia Partners does not tolerate any forms of discrimination, bullying, or harassment against or by employees or clients based on race, color, creed, religion, nationality, ethnic origin, age, gender, sex, sexual orientation, marital status, disability, or political opinion.

Examples:

As employees of Sia Partners, it is your duty to combat all forms of discrimination:

- Your behavior should support, rather than hinder, diversity and inclusion, whatever your role in this company. When evaluating performance of any kind, only skills and relevant experience should be taken into account.
- If you are a witness to or victim of discrimination or harassment, you must inform your superior. Being an accomplice to either, in any way, is punishable.

Managers, HR and employee representatives (e.g. CSE in France) are at your disposal and ready to support you in implementing this policy.



EXPECTED BEHAVIOR

We expect professional behavior from all our employees when representing Sia Partners, whether at the office, with a client, or at a sponsored event. The actions of each individual reflect upon Sia Partners' reputation and values.

The professionalism we expect of our employees also extends to their presence online. This includes, but is not limited to, activity on social media platforms, like LinkedIn, Twitter, Facebook, Instagram, YouTube, Viadeo, Google Currents, and blogs.

We expect our employees to respect the rules of conduct outlined in this Code of Conduct. If employees notice violations, concerns should be addressed via the channels outlined in our Grievance & Whistleblowing section.

Examples:

We expect all our employees to do their utmost to help cultivate a pleasant working atmosphere based on respect. Examples of everyday actions include:

- Tidying up your desk after each work day
- Cleaning up after yourself, including in the cafeteria
- Keeping exchanges with colleagues polite and convivial
- Welcoming new recruits (e.g. inviting them to lunch)
- Always treating your colleagues with respect, even if you disagree with them or are in a stressful situation
- Using the firm's expense account responsibly

Examples of the kind of commitment we expect from all of our employees:

- I am committed to behaving in a way that is respectful and caring toward others at all times.
- I am respectful of all office spaces and equipment.
- During events, I agree to follow the rules established by organizers.
- During events, I agree to report any inappropriate or dangerous behavior to an authority present on the premises (an organizer, or member of the security team).

Focus: Online Behavior

Below are 5 principles our employees should respect when engaging in the digital space.

- **1:** Respect Sia Partners' visual identity when publishing about the firm.
Any use of our logo must be approved by our creative team.
- **2:** Promote Sia Partners by sharing our publications and nonconfidential corporate news.
Do not defame or disparage Sia Partners or our clients, whether during or following your employment with Sia Partners.
- **3:** Remember that sharing your private life online could impact your professional life.
Do not hesitate to indicate that your points of view are your own, and do not necessarily reflect those of Sia Partners. Take care to distinguish between talking about Sia Partners and speaking on behalf of Sia Partners. If you do speak on behalf of the firm, ensure that the convictions you share accurately reflect those of Sia Partners.
- **4:** Act responsibly and ethically; do not share sensitive information related to Sia Partners or clients
Do not share information pertaining to client projects, ongoing or past calls for tenders, and so forth.
- **5:** Apply the same level of rigor to social media that you would to other media outlets.
Do not contribute to the spread of misinformation, and always cite your sources.

ANTI-HARASSMENT

Harassment refers to acts, behavior, or words which, by their degrading and often repetitive nature, inflict psychological or physical harm. Anyone can be the victim or perpetrator of harassment.

Harassment can take many forms: psychological, physical, sexual, digital, and so forth. Repetition and duration are essential criteria to characterize behavior as harassment.*

Sia Partners guarantees a constructive working environment where people feel free to be their authentic selves. We protect our employees against all forms of workplace harassment. (see our Grievance & Whistleblowing section).

Examples:

Concrete examples of different types of psychological harassment in the workplace include:

- An employee who repeatedly publicly criticizes or degrades another employee.
- An employee who is repeatedly asked to do demeaning tasks.
- An employee who regularly receives intrusive, pressing calls or messages from their manager during break periods.
- An employee who is denied a seat in the open space without any valid reason, in the name of exclusion.
- Someone who deliberately spreads rumors to cause harm to an individual.

Focus: how to recognize sexual harassment Three questions to ask yourself:

- *Is the remark or gesture sexual in nature?*
- *Has this ever happened before?**
- *Did it make me feel uncomfortable?*

If you answered yes to all the questions, you are likely facing sexual harassment, and should alert to your superiors or HR as quickly as possible to ensure necessary action is taken.

**(!) Repetition does not always characterize sexual harassment. One-off offenses, like sending unwanted sexual photos or asking for sexual favors, are also defined as sexual harassment.*

As part of our efforts to combat sexual harassment at Sia Partners, we aim to be proactive and raise awareness about everyday phrases and behaviors that may make other people feel uncomfortable.

Harassment and discrimination are not always intended. Individuals need to develop self-awareness and sensitivity to others.

Are you worried your behavior might be misinterpreted? Here are some good rules of thumb:

- It is best to avoid physical contact in general. Physical contact that may seem natural or unproblematic (e.g. placing a hand on one's shoulder when congratulations are in order) could be unwelcomed by the recipient.
- When proposing an outing or a drink after hours, always provide context so that your intentions are clear (i.e. are you suggesting a drink with colleagues, or something more intimate?).

- Each individual is free to share personal information while at work if they so choose, but no one should ever feel pressured to do so. All employees should set personal and professional boundaries for themselves, and these boundaries must be respected by others.

RESPECTING THE ENVIRONMENT

At Sia Partners, we are committed to mobilizing our energy and expertise to positively impact society. As an international company based in France, we consider it our duty to support the objectives set forth in the Paris Climate Agreement.

We are striving to become an exemplary company in terms of our environmental impact. We endeavor to reduce our carbon footprint and our consumption of raw material as an axis of development and commitment. (See our Annual CSR Report for more information on Sia Partners' environmental engagement.)

To achieve this, we believe it is crucial that we engage innovative initiatives as part of a collaborative approach. This means that all stakeholders need to get involved:

- Sia Partners employees have a major role to play. To help them understand how they can help, we've deployed a global Environmental Charter, displayed at all offices.
- To lower our carbon footprint, we need to be mindful of how we engage suppliers. To this end, we have launched a Responsible Purchasing Charter.

Rules:

- To expand our impact, our suppliers must commit to designing products with the lowest possible environmental impact (especially regarding feedstocks, energy, and waste). They must also adopt the precautionary principle and, naturally, respect environmental legislation and regulation. (see our Responsible Purchasing Charter)
- Our employees are the ambassadors of our group and are thus expected to exhibit model behavior on environmental issues. We expect them to follow the best practices detailed in the group Environmental Charter, the goal of which is to help us reduce our overall carbon footprint. These basic principles should be respected both at Sia Partners' and clients' offices.

Group Environmental Charter.

Sia Partners is striving to make all offices eco-friendly, and collective participation is key. Here is how we can all contribute



LIMIT USE OF SINGLE-USE PLASTIC & DISPOSABLE TABLEWARE



TURN OFF LIGHTS & COMPUTERS WHEN NOT IN USE



SORT WASTE USING THE RECYCLE BINS PROVIDED



FAVOR & PROMOTE PUBLIC TRANSPORT & CYCLING



DISPOSE OF CIGARETTE BUTTS IN THE ASHTRAYS PROVIDED



AIM FOR PAPERLESS

(print only when absolutely necessary; always favor B&W, double-sided, and lower-quality prints; use scrap or recycled paper when possible)



LIMIT DAILY CONSUMPTION OF MEAT & FISH; OPT FOR LOCAL & SEASONAL PRODUCTS

- We encourage all employees to read our annual CSR Report. If they have additional ideas or suggestions, they are very welcome to submit them to the group CSR project manager.



Examples:

- If you see your colleagues forgetting to recycle, we encourage you to explain to them how recycling works at Sia Partners. Raise awareness, leverage your impact.
- For lunch, we encourage you to use Sia Partners' tableware. Avoid single-use plastic. You are also encouraged to bring your own reusable shopping bags to transport your meals, whether prepared at home or picked up from restaurants.
- You've noticed that a water fixture is leaking? Please contact office management to inform them.
- If you smoke, dispose of your cigarette butts in the ashtrays provided.
- There are no public transport options to travel to a client's office? Consider cycling for a portion of the commute. If you must use a car, favor carpooling.
- Use computers in an environmentally-friendly way. Unsubscribe from unwanted newsletters, delete

unnecessary emails, opt for Google Drive links rather than attachments in your emails, turn off your computer when not in use, and print only when absolutely necessary.

- To contribute to reducing our consumption of raw materials, employees in some locations are provided a BYOD (bring your own device) option. This allows them to use a single phone for personal and professional purposes, and Sia Partners will reimburse half of their phone plan expenses.
- Business travel should be a last resort. Employees and managers should prioritize virtual alternatives where possible, or where accepted by our clients. All travel by plane must be approved by a partner. This information is outlined in Local Environmental Action Plans provided to all geographies.
- As a Sia Partners employee, would you like to be involved with initiatives and assignments dealing with the energy transition? We encourage you to develop your knowledge by keeping up with the publications in our Climate Analysis Lab for Good, or become a contributor to this lab.

Conducting our business with integrity and independence.

Sia Partners' CEO is actively involved in maintaining an anti-corruption policy and framework. To ensure compliance with anti-corruption laws and in the interest of defending and promoting ethics and integrity, we are committed to upholding an anti-corruption framework, training our employees, and equipping them to denounce any situation that violates our values or the law. As per Article 17 II 1° of the Sapin II law, this section of our Code of Conduct covers forbidden behaviours and issues related to the fight against corruption, influence peddling and fair competition. The Sapin II law is extraterritorial and applies to all of our entities abroad.

PREVENTING CORRUPTION AND INFLUENCE-PEDDLING

Behaviors that constitute corruption and influence peddling are strictly prohibited.

Corruption describes the abuse of public or private office for personal gain. This includes situations in which a person in a position of influence offers, promises, solicits, or accepts a gift in exchange for favors within the scope of their office.

Influence peddling describes a person in authority leveraging their influence in exchange for favorable decisions or money.

Politically exposed persons (PEPs): in general, PEPs are people who are considered to be exposed to “higher risks” of corruption (money laundering, in particular) because of the political, jurisdictional, or administrative functions they exercise, or have exercised within a year, either on behalf of a State or a public international institution established by treaty (e.g. a member of a court of auditors; a member of the management body of a central bank; a member of the administrative, management, or supervisory body of a public enterprise).

Examples of prohibited behaviors:

Sia Partners' employees must not:

- Affect, offer, or promise cash payments, services, gifts, or individual invitations to public officials in exchange for an inappropriate advantage.
- Affect, offer, or promise cash payments, services, gifts, or individual invitations to partners (prospects, clients, or service providers) in exchange for an inappropriate advantage.
- Use an intermediary or act as an intermediary for such behaviors. If in doubt or faced with situations they believe are problematic, employees should contact their superiors.

Example:

I learned, informally, that the Ministry of the Interior is seeking support for a human resources management project. I plan to invite one of my contacts, who works for the ministry, to have dinner at a prestigious restaurant in order to gain their favor for the public tender.

Can I do this?

No, this behavior constitutes an attempt to leverage the influence of a public official in exchange for an invitation. It is influence-peddling.

GIFTS AND INVITATIONS

A gift is defined as any material advantage, offered in the context of a professional relationship, the value of which may vary greatly depending on the circumstances (standard of living, context, etc.) and the parties concerned.

An invitation means any intangible perk offered in the context of a professional relationship. These could include invitations to sporting or cultural events, or seminars.

Conditions for granting or accepting a gift or invitation:

Granting or accepting a gift or an invitation does not, by default, constitute corruption or influence peddling. However, employees must be vigilant in cases where this could be the case.

Granting or accepting a gift or invitation is therefore **tolerated if:**

- The gift or invitation is offered without ambiguity and does not assume any compensation;
- The value of the gift is reasonable, that is to say below the threshold established by country;
- The gift or invitation is appropriate given the relationship with the business partner;
- The gift or invitation is legal;
- The gift or invitation is exceptional (the annual frequency of gifts and invitations should be monitored).

Granting or accepting gifts or invitations is strictly **prohibited if:**

- Gifts or invitations are granted on the condition of being compensated;
- Gifts or invitations are offered to any decision-maker in a tender procedure;
- Trips are offered with no direct link to any professional activity;
- Sums of money of any kind are offered (cash or check, gift voucher, and so forth);
- Gifts or invitations are offered to a family member or friend;
- The behavior is prohibited by law.

Focus: Procedures to follow for granting or accepting a gift

Prior to granting or accepting a gift, Sia Partners employees must refer to the "Gifts & Invitations" form, which will provide guidance on how to proceed, if at all. In the interest of traceability and transparency, any gift offered or received must be declared by the employee using this same "Gifts & Invitations" form.

In addition, any employee who plans to offer or accept a gift exceeding the value established for their country of operation must obtain written authorization from their supervisor. Likewise, any employee who plans to offer a gift or invitation to a politically exposed person or a public official, or plans to accept a gift or invitation from a politically exposed person or a public official, must obtain a written authorization from their supervisor and from Sia Partner's compliance approvers (compliance@sia-partners.com).

When gifts may be accepted, Sia Partners employees are invited to share their gifts with their team.

If in doubt, employees should contact their supervisors.

Focus: Procedure to follow for granting or accepting an invitation

Prior to granting or accepting an invitation, with the exception of business meals, Sia Partners employees must refer to the "Gifts & Invitations" form for guidance on how to proceed, if at all. For the sake of traceability and transparency, any invitation offered or received must be declared by the employee using this same "Gifts & Invitations" form.

For invitations offered or received by an employee, it is their supervisor's responsibility to assess whether it is appropriate and complies with Sia Partners anti-corruption and anti-influence peddling rules.



Focus: Business meals

Offering or receiving an invitation to a business meal with a client is a common and acceptable thing in the context of any professional activity. These business meals must appear in the "Cleemy" tool, as part of the expense reports management procedure.

However, it is important to be vigilant regarding the value and recurrence of such invitations. Indeed, the value of the business meal must be appropriate given the business relationship and the position of the employee who offers or receives. In addition, repeated invitations, or invitations to particularly expensive or high-end restaurants, constitute risky situations.

It is also important to remain vigilant regarding the position of the donor or beneficiary of the business meal. Indeed, any employee who plans to offer a business meal to a politically exposed person or public official, or who plans to accept a gift received from a politically exposed person or public official, must obtain written authorization from the Group CFO or the Head of Marketing & Corporate Development department of Sia Partners.

An invitation to a business meal is strictly **prohibited** if:

- The invitation is extended to a decision-maker involved in an ongoing call for tenders;
- The invitation is subject to compensation;
- The invitation has no direct link to the professional activity;
- The invitation is inappropriate in regard to the business relationship.

Examples:

Over coffee, my project sponsor tells me that he's passionate about opera.

Can I invite him to the opera?

No. This invitation does not seem appropriate, given the relationship, which should be strictly professional. Furthermore, the cost of such an invitation would likely exceed the established threshold.

Following the end of his assignment, a manager invites his former client to dine in an upscale restaurant to celebrate the end of his assignment.

Is this invitation acceptable?

No. This invitation is not appropriate.

Each year, Sia Partners uses the same supplier for the Christmas tree buffet, and the sales department decides to invite this supplier to lunch at a high-end restaurant.

Is this invitation acceptable?

No. This invitation is not appropriate.

When in doubt, employees should contact their supervisors, who will help them determine how to proceed.

FACILITATION PAYMENTS

Facilitation payments are not only strictly prohibited by Sia Partners, they are illegal in many countries.

Facilitation payments are unofficial payments of small amounts, intended to facilitate or guarantee the smooth running of simple procedures or necessary action, which the payer is entitled to expect, whether this right has a legal basis or not.

Examples:

During an assignment for a construction company located abroad, I need to ask local authorities for an administrative document. My interlocutor, a public official, informs me that obtaining the document will take several weeks, but a small gratuity could speed up the process.

Should I pay this gratuity?

No. This gratuity constitutes a facilitation payment because it consists of a payment made to a public official in order to carry out or speed up administrative formalities.

This is strictly prohibited by the Code of Conduct.

PREVENTING CONFLICTS OF INTEREST

A conflict of interest is a situation in which a person experiences competing interests in the course of their duties, whether personal or professional.

Focus: Approach to follow

Sia Partners employees must identify and prevent conflicts of interest (e.g. in the context of a call for tenders or during an assignment).

- **In the event of a potential conflict of interest:** the employee should express their concerns to their supervisor;
- **In the event of a proven conflict of interest:** the employees should alert their superior to the situation and withdraw from the tender process or project.

Examples:

Situation 1: *My team is responding to a tender process from a company in the food industry. The purchasing manager for this company is a teammate's life partner.*

Can I involve this colleague in the project?

No. In this situation, the purchasing manager of the food company has private interests that are likely to influence his choice. The consultant also has interests likely to influence the conduct of the assignment, were they to participate.

In order to avoid a conflict of interest, this consultant should not be included in this project. Furthermore, this situation should be mentioned in the tender submission. This will equip the food company to adopt appropriate measures to ensure that the decision is made in complete transparency (double examination, and so forth).

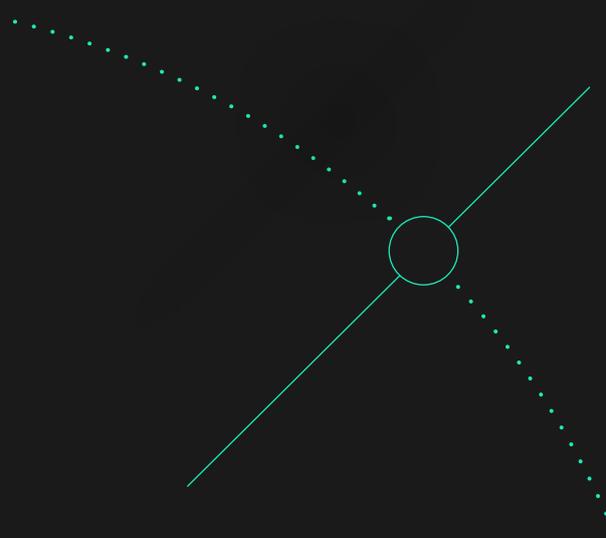
Situation 2: *As a senior consultant, I have been contacted by HR to schedule a recruitment interview with a candidate. I happen to know this candidate quite well, as he was a friend of mine at school.*

Should I conduct this interview ?

No. You would not be impartial in this scenario.

If you ever have any doubt regarding your impartiality about a candidate, you should tell your HR representative about it. They will be familiar with any applicable rules and regulations, and will be able to tell you whether you may conduct the interview.

If you want to recommend someone you know for a job, a dedicated procedure is in place. Interviewing and assessing them is not your role.





PREVENTING FRAUD

Employees and other stakeholders are expected to act with honesty and integrity and must report any instance of suspected fraud immediately using the Grievance & Whistleblowing Procedure.

Fraud can be defined as “an intentional act by one or more individuals amongst management, those charged with governance, employees, or third parties, involving the use of deception to obtain an unjust or illegal advantage.”

Examples:

Fraud may involve:

- falsification or alteration of accounting records,
- misappropriation of assets or theft,
- suppression or omission of the effects of transactions from records or recording of transactions without substance,
- intentional misapplication of accounting policies or willful misrepresentation of transactions or of the entity's state of affairs,
- misapplying corporate or bank funds
- manipulation of information system applications and data for personal advantage

The above list is not exhaustive: if you have a concern about a transaction or someone's behaviour, please discuss it with your manager, or follow the Grievance & Whistleblowing Procedures.

POLITICAL ACTIVITIES

Sia Partners does not support any political party, anywhere. To prevent conflicts of interest, we prohibit corporate contributions to political parties or candidates on behalf of Sia Partners or our clients.

Rules:

Employees may participate in political activities as individuals, on their own time. They cannot do so as representatives of Sia Partners. As a consequence, they should refrain from activities that could place Sia Partners in a partisan political posture. They should also take the appropriate steps to avoid any conflict of interest between private political activity and their work at Sia Partners (see the section on Preventing conflicts of interest).

Examples:

Situation 1: *I am a Sia Partners employee, but also a citizen who wants to get involved in the local chapter of a national political party.*

Should I ask permission from my manager?

No, you are free to become involved with any political party, as long as it is a personal activity, you are not representing the firm, and there is no conflict of interest.

Situation 2: *I am a Sia Partners employee, and I would like to become involved in a municipal campaign. The candidate campaigning has a business relationship with a Sia Partners client, and I report to them in my assignment.*

Can I do so?

This situation runs the risk of a conflict of interest. You should talk about this potential political activity to your supervisor before making a decision.

SPONSORSHIP AND PATRONAGE

Sponsorship is material support provided to an event, a person, a product, or an organization, given with the expectation of directly benefiting from it.

Patronage is defined as material support provided to a person or organization, without direct compensation from the beneficiary, for the exercise of activities of general interest.

Focus: Behaviours to prohibit

Sponsorship and patronage activities are part of the life of the company, but precautions must be taken to ensure that these do not lead to harmful consequences for the company or its employees.

Employees in charge of patronage and sponsorship activities must be careful not to:

- Grant funds to an entity/association without having completed the company's procedure for selecting business partners;
- Grant funds to an entity/association that has issued a call for tenders in which Sia Partners is participating or plans to participate.

Examples:

A BU is working on a response to a call for tenders for the association, Doctors Without Borders. In parallel, the firm plans to provide financial support to a related association.

Can this support be given to Doctors Without Borders?

No. This support does not seem appropriate, it could influence decision-making within the framework of the call for tenders issued by Doctors Without Borders.

SELECTION PROCESS FOR SUPPLIERS

Sia Partners promotes equity and the protection of fundamental human rights, and believes that these values should be at the heart of supplier relationships. Arbitration for the purchase of goods and services from our suppliers is based on criteria defined in our responsible purchasing charter. This charter affirms our group's commitment to our suppliers: fair operating practices, ethical behavior, and transparency. It also expresses the standard to which we hold our suppliers and subcontractors, who are expected to comply with our requirements and procedures, as well as those of our clients. This includes, but is not limited to, respect for the labor law in pertinent geographies, human rights, due diligence, and national and international regulations.

Examples:

We are committed to honoring our commitments made to suppliers, and to be fair and equitable in our selection process. All corrupt practices on the part of suppliers are not tolerated. Any employees who find themselves subjected to pressure or problematic requests from third parties must inform their superior. We respect the cultures and local laws and regulations of the countries in which we operate. We cooperate fully with public and professional entities who oversee the compliance of our activities within their jurisdiction.

INSIDER TRADING

Every one of us must act in a responsible manner and respect market integrity. The following are specifically prohibited: breaching insider trading rules, disclosing inside information in an illegal manner, disseminating information that sends false or misleading signals to the markets, or manipulating prices.

Examples:

If a consultant, while on an assignment, becomes aware of strategic information about a company that could be used for investment gain, they must neither share nor use this information. In addition to insider trading, this example highlights the importance of data protection and confidentiality, which must be respected.

ACCURATE AND CORRECT BUSINESS AND FINANCIAL INFORMATION

Sia Partners is committed to providing accurate business and financial data concerning its activity, when such information is needed. Transparency is part of our commitment to our employees, as well as to our customers and suppliers.

Examples:

- During a call for tenders, if a client asks us for information about Sia Partners' standing (e.g. relating to our financial health, HR, or CSR), we ensure that all the information provided is true and representative to date.
- We expect all of our employees to be able to present the company clearly and accurately. All relevant information is made available on our intranet (e.g. information on the number of employees, different offices, expertise, etc.). This information enables our employees, among other things, to accurately present and represent Sia Partners to other stakeholders



Maintaining the security and integrity of Sia Partners and third-party assets.

INTELLECTUAL PROPERTY

The term "intellectual property" refers to works of the mind: inventions, publications, designs, names, and images used in commerce. At Sia Partners, we are particularly attentive to ensuring that the notion of intellectual property is respected by all parties.

Examples:

Examples of basic rules within Sia Partners:

- For presentations, several tools and materials are at your disposal on our intranet. If you need other images, you can contact the marketing team.
- Source and date all information pulled from external sources.
- If you conduct interviews, you must ensure that interviewees consent to the publication of their interviews, and have signed all necessary documents.
- If you are unsure about an issue related to intellectual property, before using the property in question, check with the marketing team to avoid any fines or legal problems.
- Each of our employees is also expected to protect the value produced by Sia Partners: documents, materials, and information about assignments must remain confidential. Such information must not be disclosed to external persons or be presented outside the framework of Sia Partners. In certain cases, the reuse of Sia Partners media for internal purposes must be validated with the authors.

CONFIDENTIAL INFORMATION

Guaranteeing the confidentiality of information helps to maintain and strengthen the trust our clients place in us. Our employees are ambassadors of Sia Partners; as such, they must respect the individual commitments made before or in parallel with their activity at Sia Partners. For example, consultants must respect the confidentiality clauses that continue to bind them to their former employers and clients. Compliance with these commitments must be ensured, notably when drafting Sia Partners CVs.

Completing assignments for clients generally requires that clients provide data that may be confidential in nature. By signing a contract with Sia Partners, the client places their trust in the firm, and the consultants must be guarantors of this trust.

Throughout their activity at Sia Partners, employees must ensure that confidentiality is preserved with respect to the activities of our group and our clients (internal communications, commercially sensitive data, databases managed by Sia Partners, and so forth). Employees must not communicate the identity of clients or any other commercially-sensitive information to third parties, whether in a professional (e.g. Sia Partners recruitment interviews) or personal setting.

Examples:

We expect our employees to:

- Not disclose client information to third parties without prior written consent of the client.
- Communicate information - on a restricted basis - only to other employees involved in an assignment.
- Not copy information or documents unless it is necessary for the execution of the assignment, and only after having obtained the agreement of the client.
- Not share any information pertaining to an assignment outside the scope of said assignment, and prevent access or fraudulent use by third parties (see Sia Partners' IT security rules).
- Not store or send professional data or documents on a personal computer or via personal messaging services or platforms.
- Report any suspected breach of these obligations to the client and person in charge of the assignment.

PROTECTING PERSONAL DATA

Sia Partners is committed to training its teams on personal data protection. Our GDPR expertise is engaged both externally, for specialized assignments, and internally, to inform our own practices.

We respect the individual privacy of all of our stakeholders, whether they are clients, partners, or employees. We request personal data only if it is of use in serving the interests of our clients, employees, or partners, improving the quality of our services, complying with statutory obligations, or effectively managing our company.

Our data protection policy, which complies with GDPR, is described in our procedure for the protection of personal data (see our Privacy Policy). With regard to AI, we are striving to go beyond protecting personal data by developing a global framework that guarantees the ethical dimension of our AI projects.

Examples:

We expect all of our employees to respect the basic security rules for personal and confidential data.

During recruitment procedures, CVs sent or received by email must be deleted. Employees must be aware that even a name or a professional email address constitute personal data, and must therefore ano-

nymize any documents containing the CVs of employees who are no longer with Sia Partners (ex: responses to tenders).

Focus: basic rules of cybersecurity

Employee involvement is essential for the protection of our devices and data. Here are the basic rules you should follow when using any digital devices, as described in our Group Cybersecurity charter:

- Create complex, unique passwords, keep them secret, and change them regularly: passwords must have a minimum of 8 characters and contain a capital letter and a special character.
- Be cautious when using usb keys & public wi-fi.
- Update your software and applications regularly: be cautious with downloads, and opt for official websites only.
- With respect to emails, watch out for phishing: be mindful of odd emails or intrusive requests. If you notice anything suspect, please inform:
support.info@sia-partners.com
- Do not leave your device alone without securing it
- Have backups, regularly save your data on the drive.
- Comply with confidentiality rules: as a general rule, pay close attention to the level of confidentiality of information before sharing it. Do not share information if it is not necessary, or through unconventional channels.

APPROPRIATE USE OF GROUP AND THIRD-PARTY ASSETS AND RESOURCES

Each of us must ensure that our company's assets are protected and use them carefully. No one should make excessive personal use of the equipment and services made available for them. Everyone should strive to use resources economically and to take environmental aspects into account in their decision making.

Updating the Code of Conduct.

Sia Partners is committed to updating this Code of Conduct whenever necessary, in order to best reflect the group's ambitions and expectations. In particular, this Code of Conduct was created fol-

lowing a methodology based on risk mapping. As such, it will be reviewed following any new risk mapping and on an ad hoc basis following any incidents, as the case may be.

Asking Questions.

If you have any uncertainties or questions, please ask your supervisor, career counselor, any Sia Partners manager, or Human Resources.

If you would like to send us your comments or remarks concerning this Code of Conduct, please do not hesitate to reach out directly via legal@sia-partners.com.

For concerns and questions concerning corruption, please reach out via compliance@sia-partners.com.



Appendix.

LAWS AND STANDARDS

Sapin 2 Law

The Law n°2016-1691 of December 9, 2016, which concerns transparency and anti-corruption, referred to as the Sapin 2 Law, has propelled France to the highest standards of the fight against corruption.

To ensure compliance with the law and in the interest of defending and promoting ethics and integrity, Sia Partners is committed to training its teams and equipping them to denounce any situation that violates our values or this law.

Syntec Conseil

Industry agreements represent an additional level of compliance for Sia Partners. We are part of Syntec, representing more than 3,000 French groups and companies specializing in the digital, engineering, consulting, events planning, and professional training professions. Beyond market standards, we adhere to the standards imposed by Syntec, which are often more demanding.

Maximum Value for Gifts & Invitations

Gifts and invitations should not exceed 80 euros, or the equivalent in local currency.

SANCTIONS

Disciplinary sanctions :

Any misconduct in regard to the present Code of Conduct will be penalised according to Sia Partners' internal rules of procedure, as defined locally by each office and as communicated to all employees.

I. Any act considered to be wrongful may, depending on its gravity, be subject to one of the sanctions listed below, in order of importance.

II. Taking into account the facts and circumstances, one of the sanctions below may be imposed:

- First Warning: a written reprimand for misconduct;
- Second Warning: a final written reprimand;
- A disciplinary layoff: either temporary suspension of the contract without remuneration or permanent suspension, depending on the gravity of the situation. Please note that depending on the gravity of the misconduct, a disciplinary layoff sanction may be applied without prior warning.

III. For the same type of misconduct on which the employee has already been warned, stronger disciplinary action may be taken.

Criminal and administrative sanctions concerning the Sapin 2 Law:

As a reminder, in French criminal law, corruption offenses are punished by penalties up to:

- **10 years imprisonment and a €1 million fine** for individuals,
- **A €5 million fine or two times the proceeds from the offense** for legal persons.
- Additional convictions may be applicable.

In French criminal law, influence peddling is punished by penalties up to:

- **5 years imprisonment,**
- **A fine of €500,000 or twice the proceeds from the offense.**

It is also important to remember that the sanctions committee of the French Anti-Corruption Agency (AFA) has the power to impose sanctions. Indeed,



it can impose financial sanctions within the limit of **€200,000** with regard to natural persons and **€1 million** with regard to legal persons for non-compliance with the obligations described in the law known as the Sapin 2 Law.

In addition, **bodies or legal representatives** who do not undertake necessary measures (ref. Anti-corruption section of the Sapin 2 Law) or obstruct the performance of resulting obligations will incur a **sentence of two years' imprisonment and a fine of €50,000**.

RESOURCES

Internal resources:

Online training

To discover our online training modules, go to 360learning using the login information provided to you during onboarding.

Charters and other internal documents

- Responsible Purchasing Charter
- Responsible Digital Charter
- Group Environmental Charter

- Local Environmental Action Plan
- Sia Partners Annual CSR Report
- Gifts & Invitations Form
- Grievance & Whistleblowing Form*

An employee handbook is in place in France and the United States, which must be consulted by employees in these zones.

Supporting documents for this Code of Conduct, including those listed above, can be found on Sia Partners' intranet, or upon request from your Corporate Development team.

**available on Sia Partners' intranet*

External resources:

- [The Ten Principles of the UN Global Compact](#)
- [The UN guiding principles on business and human rights](#)
- [Collective convention of Syntec](#)
- [The International Labor Organization](#)
- To discover just how much stereotypes can influence our thinking, we encourage you to take the [Implicit-Association Test \(IAT\)](#), developed by the Implicit Association at Harvard

SIAPARTNERS

- Belgium
- Canada
- France
- United Kingdom
- Germany
- Hong Kong SAR
- Italy
- Ireland
- Japan
- Luxembourg
- Morocco
- Netherlands
- Qatar
- Saudi Arabia
- Singapore
- United Arab Emirates
- United States
- Panama*

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FOR GOOD