

# Anti-Corruption Code of Conduct

Our leadership in the engineering and technology consulting services market gives us a responsibility to all our stakeholders. For this reason, CIeNET has put Ethics and Sustainable Development at the heart of its strategy and is building its growth around two basic principles: integrity and transparency. CIeNET takes the form of practical measures in three key areas:

Respect for the environment and human rights are one of the pillars of our corporate social responsibility. Each site plays an active role in promoting the Sustainability Management, a token of our actions in this area.

CIeNET is determined to outlaw all forms of corruption in its business activities. This Anti-Corruption Code is a guide to be applied day-to-day to prevent and combat corruption and conflicts of interest. It supplements our ethics and compliance management and reiterates the key principles to be upheld in the area of business ethics. Combating corruption is a matter for all employees. We must lead by example and bring this message of "zero tolerance" to all our stakeholders.

Finally, CIeNET is committed to maintaining lasting relations with our stakeholders. It is up to us to develop trust-based relationships with our employees, clients, suppliers and shareholders.

Each employee, irrespective of hierarchical level or responsibilities, must act in accordance with CIeNET's ethical culture.

## Supervision

According to the requirements of the company's integrity supervision committee, regularly conduct publicity and education for employees. The regulation specifies the various types of corruption that must be prohibited for the purpose of seeking improper benefits, and also sets punishment measures for corruption of different severity to ensure that all kinds of corruption can be punished accordingly.

If you encounter some unfair treatment in the process of cooperating with CIeNET, which seriously affects our cooperation, you can report it through the following channel: [supervision@cienet.com](mailto:supervision@cienet.com).

This anti-corruption code of conduct (the "**Code**") applies to all of CI@NET's sites as well as to all of their internal and external employees and corporate officers (the "**Employees**").

The Code forms an integral part of the company's internal rules. It is supplemented by internal policies and guidelines.

By definition, the Code cannot cover all the potential situations Employees may face in the course of their daily activities. It contains principles and advice that show the way forward for engaging in ethical conduct.

Consequently, each Employee must exercise his/her own judgement and use good common sense. If they have any doubts over appropriate behavior, Employees should refer to the assistance and advisory resources set up by CI@NET and are asked to contact the supervision and management board. For whistle-blowing that violate international laws and regulations, the supervision and management board will further trigger the original whistle-blowing materials to the Group's Head of Compliance.

## 1. Anti-corruption rules

### 1.1. Definitions

- **Corruption**

Corruption is conduct whereby a person (public official or private individual) offers, requests or accepts, either directly or through an intermediary, a donation, offer or promise, gift or advantage in order to act, delay acting or refrain from acting directly or indirectly in the exercise of their functions, or to obtain or maintain a commercial or financial advantage or to influence a decision.

There are two types of corruption:

- **active corruption** is where the action has been initiated by the briber;
- **passive corruption is when** the action is initiated by the person taking it, i.e., the person who acts or fails to act in exchange for a consideration.

- **Influence peddling**

Influence peddling is where an individual uses his or her position or influence, whether real or implied, to influence a decision to be made by a third party. It involves three protagonists: the beneficiary (the individual offering the advantages or donations), the intermediary (the individual who uses the credibility derived from his or her position) and the target who has decision-making power (public authority or administration, magistrate, expert etc.).

For the purposes of the Code, the term "corruption" refers to corruption in all its forms as well as influence peddling.

### 1.2. Principles and general rules

**Employees must not engage in corrupt practices and must not utilize intermediaries such as officials, consultants, advisers or any other commercial partners with the aim of engaging in such practices.**

**Consequently, the principle of "zero tolerance" applies in matters of corruption.**

If Employees are faced with a high-risk situation, they must ask themselves the following questions:

- are laws and regulations upheld?
- does it comply with the Code of Conduct and the interests of CIeNET?
- is there no personal interest involved?
- would I be embarrassed if others were told of my decision?

### **1.3. Specific rules**

- **Partnership/Mergers and acquisitions**

Within the scope of its partnerships, mergers and acquisitions, the reputation of CIeNET may be significantly affected by its partners and their actions.

Moreover, CIeNET may be held liable as a buyer as part of any mergers or acquisitions, including for events prior to the acquisition.

**It is essential to deal only with partners who uphold the rules of integrity, values and principles of CIeNET. Consequently, no transaction may be initiated or pursued until all elements of doubt have been lifted following due diligence.**

- **Gifts and hospitality**

Gifts are benefits of any type, including in-kind, that are given free of charge, such as: invitations, meals, entertainment etc.

Employees must be wary of gifts and invitations that help to establish good business relations but may be considered to be a means of influencing a decision, favoring a company or an individual. Consequently, gifts can be likened to, or perceived as, active or passive corruption.

**Any gifts or invitations other than those with a symbolic value are prohibited.** As a result, before offering a gift or invitation, employees must consult CIeNET's gifts and hospitality policy to check whether the value of the gift or invitation falls within the category of symbolic value, the only category permitted.

- **Donations, charitable contributions**

Donations are advantages given in the form of money and/or contributions in-kind which are granted with a specific aim: research, training, the environment (sustainable development), for charitable or humanitarian purposes etc.

CIeNET has put in place a specific organizational structure for donations and charitable contributions. **Only the departments responsible for charitable works are permitted to proceed with such initiatives, subject to the agreement of Senior Management.**

Requests for donations or contributions must indeed be considered very carefully, in particular those from people who are in a position to influence the activities of CIeNET or who may, should the donation be agreed, derive personal benefit from it.

- **Patronage and sponsorship**

Through patronage and sponsorship, CIeNET wishes to offer financial or material support to a project, social, cultural or sporting initiatives in order to communicate and promote its values.

**Patronage and sponsorship initiatives require approval from Senior Management. They must be carried out without seeking any advantage other than promoting the image of CIeNET.**

- **Representing interests (lobbying)**

Lobbying (representing interests) means entering into direct or indirect contact with a public official in order to influence a public decision, particularly the content of a law or regulation, in order to promote specific values and interests.

Lobbying activities require approval from Senior Management. They must be clear and transparent.

In France, ALTEN Group's lobbying activities must be entered in the public register of lobbyists created by the High Authority for Transparency in Public Life.

- **Facilitation payments**

Facilitation payments are unofficial payments (as opposed to legitimate and official duties and taxes) paid to facilitate or accelerate any formalities, particularly those that are administrative in nature, such as permit or visa applications or customs clearance.

**Facilitation payments are prohibited** except on urgent grounds approved by Senior Management (health or safety of an employee etc.).

- **Conflicts of interest**

Conflicts of interest arise from any situation where the personal interests of Employees are in conflict with their duties or responsibilities.

**If circumstances give rise to a potential or proven conflict of interest, the relevant Employees must report it to their manager. The manager must keep a record of the report.**

## **2. Implementation**

### **2.1. Training**

Employees are required to familiarize themselves with this Code and attend training sessions organized by CIeNET so as to raise their awareness of the fight against corruption. Awareness-raising is carried out with new Employees as soon as they take up their position.

## **2.2. Whistleblowing system**

CIeNET is committed to:

- addressing all reports;
- handling reports with diligence and in strict accordance with the presumption of innocence;
- evaluating the facts objectively and impartially;
- implementing remedial measures and appropriate disciplinary penalties.

Within the Group, whistleblowers benefit from the protection scheme set out in Chapter II of Law No. 2016-1691 of 9 December 2016 on transparency, the fight against corruption and the modernization of economic life, as amended by Law No. 2022-401 of 21 March 2022, which are published in France.

## **2.3. Penalties for breaching this Code**

The Employee is personally liable for any failure to uphold the rules and may face disciplinary penalties as set out in the company's internal rules without prejudice to any criminal or administrative penalties, depending on applicable legislation.

## **2.4. Bookkeeping/internal controls**

When carrying out controls, the accounting and financial departments of CIeNET, their internal and/or external auditors keep a close eye on instances of concealed corruption in the books, ledgers and accounts.

Employees working on these assignments must be particularly vigilant that the accounts are accurate and sincere.

## **2.5. Due diligence in business relationships**

It is necessary to check the worthiness of any partner and the integrity of the business relationship. It is a case of assessing the intrinsic quality of the partner (criminal record, sanctions, reputation etc.) by checking the legal, economic and material conditions associated with this business relationship (partner's organizational structure, contract, legal and financial structure, terms of payment, etc.).

By performing a due diligence on its partners prior to entering into a business relationship, CIeNET guards against any reputational risk or risks of sanctions associated with unlawful practices.

## **2.6. Checking and monitoring the implementation of the Code of Conduct**

It is up to each employee to implement the Code of Conduct. Each site of CIeNET carries out regular checks to ensure that practices are compliant.

The governance bodies of CIeNET hold regular reviews of how implementation has been monitored and reports followed up.