

CRIMINAL FINANCES STATEMENT ON THE YEAR 2019

2ND EDITION



Linedata

AUDIT & COMPLIANCE

03/17/2020



INTRODUCTION

The « **Criminal Finances Act 2017** » is an Act of the United Kingdom Parliament relating to financial crime, which condemns companies, including foreign companies, for not preventing tax fraud in the UK and abroad.

Linedata Group, headquartered in France, has a turnover of € 169,7 Million at the end of 2019 and employs over 1,250 people worldwide. The Group is present in the United Kingdom and in Ireland. It has 4 offices in this area: London, Oxford, Edinburgh, Dublin.

The Linedata Group takes its obligations under the "Criminal Finances Act 2017" very seriously and is fully committed to the prevention of financial crime.

This statement describes the measures undertaken by Linedata Group during 2019 to fight all forms of financial crime in the course of its activities.

OUR ACTIONS TO COMPLY WITH BUSINESS ETHICS

Linedata Group commits to maintain at all times ethical behavior in the conduct of its business and to fight all forms of financial crime. For these purposes, the Group monitors its financial flows in accordance with the legislation in force.

Linedata Group ensures that its reputation and image remain intact and is not aware of any violation related to financial crime, which could have been committed or facilitated by a customer, an employee or a partner.

In accordance with the « **Criminal Finances Act 2017** » and the French Anti-Fraud Act of October 23, 2018, the Linedata Group undertakes to fight all forms of tax evasion, by implementing procedures and policies to prevent and detect cases of tax evasion.

The Linedata Group is established in countries with favorable taxation (Luxembourg, Ireland, Hong Kong). However, these establishments are in no way intended to set up tax arrangements.

Linedata Group commits to exercise adequate care on its employees in order to reduce the risks associated with attempted tax evasion.

The Linedata Group joined in 2019 the United Nations Global Compact related to human rights, labor law, environmental protection and the fight against corruption. As a participant, the Group undertakes to support in its sphere of influence the ten principles of this Pact and in particular to act against corruption in all its forms, including extortion and bribery

The Code of Ethics and Business Conduct

Linedata Group's values and principles are gathered in a Code of Ethics and Business Conduct. This Code constitutes a unifying cement that provides each Group employee with a framework of reference for exercising their professional activity. This Code is updated every year and supplemented as needed. This Code includes provisions relating to the fight against:

- Bribery and trading in influence
- Money laundering and the financing of terrorism
- Tax evasion

Each employee shall have an ethical behavior and appropriate disciplinary measures will be taken in case of an evasion or an attempted tax evasion

OUR ACTIONS TO COMPLY WITH BUSINESS ETHICS

Assessing our business partners

The Group has set up a « Business Partner Charter » applicable to its customers, suppliers, partners and subcontractors and to which they will be required to adhere.

By signing this Charter, commercial partners commit to respect its fundamental principles and allow the Group's Audit & Compliance Department to carry out audits of their activities. Failure to comply with this Charter may in certain cases lead to the termination of the contractual relationship.

In addition, Linedata Group deployed for its most significant suppliers a "Supplier questionnaire" to ensure that they adhere to the appropriate labor standards across countries of operation.

Whistleblowing system

An ethics alert system is deployed within Linedata and is accessible to all employees, as well as to any third party.

If an employee believes, in good faith, that a law, regulation or even one of the principles set out in the Linedata Code of Ethics is violated or about to be violated, he may, in compliance with the applicable rules in the country where he resides and carries on his activity, freely report his concerns or to the Audit & Compliance department of his concerns via the contact details: InternalAudit@se.linedata.com

In addition, Linedata has set up an alert system with the service provider Expolink, which is available to any employee or third party:

- Online: <https://wrs.expolink.co.uk/> password : Linedata
- By phone : +44 12 49 66 16 08

This declaration made under the « **Criminal Finances Act 2017** », was approved by the Board of Directors of Linedata Group, which authorized the Chief Executive Officer to sign a declaration in accordance with the terms of the statement, adopted in Board of Directors.

Chief Executive Officer

Anvaraly Jiva