

# Message from the Chief Executive Officer



"As a leading software provider, Linedata adopts a responsible approach to business with its clients and business partners (suppliers, partners and subcontractors). In this document, Linedata affirms the commitments it expects from its business partners."

**Anvaraly Jiva, Chief Executive Officer** 

Given its positioning, Linedata Group is aware of the economic and social impact of its activities. Linedata's responsible approach is in the heart of the company's strategy and is based on two pillars: human rights respect and business ethics.

Linedata is committed to operating in compliance with ethical standards, laws, regulations, internal policies and the following fundamental values:

## **Living Ethics**









This charter applicable to the suppliers, service providers, partners and subcontractors of Linedata (hereinafter "the **Business Partners**") describes the requirements which they must comply with when collaborating with Linedata. However, this charter cannot cover all the situations which those third parties may encounter; and they must exercise discernment and follow good practices in terms of ethical behaviour when carrying out their responsibilities, at all times.



# Summary

. Ethics & compliance	4
1.1 Complying with competition law	4
1.2 Refusing any form of fraud	
1.3 Refusing any form of corruption	4
1.4 Avoiding situations of conflict of interest	4
1.5 Complying with international sanctions regulations	5
2. Social responsibility	5
2.1 Respect labor law	5
2.2 Protect the health and safety of its employees	
2.3 Business continuity plan	
3. Environmental protection	6
4. Privacy & Protection of personal data	6
4.1 Confidentiality of information	6
4.2 Intellectual property	6
4.3 Protection of personal data (GDPR)	
5. Commitments to this charter	7



### 1. Ethics & compliance

Linedata expects its Business Partners to comply with this charter, to respect local and international laws and regulations in force, to be ethical and to reject any form of corruption or conflict of interest. If a law or regulation was more stringent than this charter, it would prevail.

### 1.1 Complying with competition law

the principles of competition law, including but not limited to:

- no participation in price fixing agreements, and more generally in any unfair practice
  that results in the exclusion of a competitor from the market or restricting access to
  the market by new competitors by illegal means.
- avoid being in a situation of excessive economic dependence on Linedata

### 1.2 Refusing any form of fraud

The Business Partner commits to dealing honestly and fairly with all of its stakeholders and to honor its contractual commitments.

In no case does the partner act fraudulently, or mislead its stakeholders, or make a false statement for the express purpose of obtaining any benefit, and does not authorize anyone to do so.

### 1.3 Refusing any form of corruption

The Business Partner undertakes to refuse any form of corruption. It must not engage in corrupt practices or in the treatment of favors which may be perceived as cases of corruption.

Any form of direct or indirect remuneration (gift, invitation) in the context of a business relationship between the Business Partner and Linedata is to be prohibited except, when it is strictly professional and is not intended to influence a decision-making process.

### 1.4 Avoiding situations of conflict of interest

A conflict of interest is a professional situation in which the power of decision and appreciation of an employee may be influenced or impaired in his independence or integrity by personal considerations.

These situations can result in particular from:

- direct or indirect friendly or family ties between the actors involved in the business relationship or likely to have an influence on it
- the implication of a former employee of the company among the stakeholders in the business relationship
- the intervention of collaborators close to the decision makers

Any familiarity or personal connection between the Business Partner and Linedata employees involved, or likely to influence the sale or purchase of products or services to Linedata Group, should be avoided.



### 1.5 Complying with International Sanctions regulations

The Business Partner commits to respect International Sanctions regulations.

### 2. Social responsibility

### 2.1 Respect labor law

The Business Partner condemns all forms of forced labor. An employee must be able to freely choose his employer. Likewise, the employee must be able to leave his employer freely, in accordance with his legal notice. Finally, the Business Partner condemns the retention of any type of identity paper (passport, identity card, work permit etc.).

The Business Partner condemns child labor and undertakes to respect the minimum age for admission to employment and the principles of the International Labor Organization.

With regard to its employees, the Business Partner undertakes to:

- Promote diversity and condemning all forms of discrimination concerning origin, gender, religion, political opinion, nationality, age, disability, sexual orientation, social origin, gender union membership, family and marital status
- Promote a continuous, open and transparent social dialogue with its employees and their representatives
- Provide employees with the opportunity to raise ethical or legal issues or issues without fear of reprisal, intimidation or any type of harassment. Depending on the country's legislation, an employee is free to belong to the union of his choice.

### 2.2 Protect the health and safety of its employees

The Business Partner declares to guarantee optimal conditions of hygiene & safety on all its sites. It must take the necessary measures to protect its employees and the proper functioning of the facilities.

### 2.3 Business Continuity Plan

The Business Partner is committed to identifying and assessing emergencies and taking the necessary steps to minimize their impact through the establishment of a BCP.



### 3. Environmental protection

The Business Partner has implemented an environmental policy and ensures compliance with any applicable national or international environmental law.

The Business Partner carries out its activity by seeking to minimize the impact of the latter on the environment.

It must take care to eliminate or reduce the sources of pollution generated by its activities, preserve natural resources, limit waste and promote recycling, reduce its consumption of energy, water and non-renewable natural resources.

The Business Partner must ensure that any hazardous waste is managed securely on all of its sites (recycling, storage, etc.) and properly disposed of in safe treatment zones.

### 4. Privacy & protection of personal data

### 4.1 Confidentiality of information

The information provided by Linedata, including personal data, should be treated as confidential and treated as such. In no case may they be communicated to third parties without Linedata's prior written consent.

In particular, the Business Partner must ensure, where appropriate, the proper implementation and strict respect of confidentiality agreements by its employees and any stakeholder involved.

### 4.2 Intellectual property

The Business Partner must always respect intellectual property rights. This means that it should not use Linedata's intellectual property rights, in particular its logo, without the express prior consent of Linedata. Likewise, it must not use the software, intellectual property or technology of other parties, without having entered an appropriate license, when collaborating or acting on behalf of Linedata.

### 4.3 Protection of personal data (GDPR)

The Business Partner must comply with its obligations under applicable European regulations, in particular the European General Data Protection Regulation (GDPR) which came into force on May 25, 2018, as well as local laws and regulations concerning in particular, the collection, processing, storage and deletion of personal data.

The provider must take all the precautions and the technical and organizational measures necessary to maintain the confidentiality, protection and security of Linedata's personal data.

The supplier ensures compliance with these commitments by its second-tier subcontractors.



### 5. Commitments to this charter

Complying with this Charter, as well as completing an evaluation questionnaire are prerequisites for the establishment of a new business relationship between the Business Partner and Linedata.

Likewise, compliance with this Charter is a decisive condition for the continuity of the contractual relationship with Linedata.

In the event of default, the Business Partner undertakes to:

- inform the Linedata Audit and Compliance department as soon as possible at the following address: <a href="mailto:linedata.com">lnternalAudit@se.linedata.com</a>.
- take all appropriate measures to restore compliance.

If the Business Partner fails to restore compliance with the provisions of this Charter, Linedata reserves the right to take all appropriate measures, including to terminate the contractual relationship



