

ETHICS CHARTER

PREAMBLE

We, at Alter Solutions, are committed to our clients. We strive more than ever to give meaning to our mission, by providing them with **our expertise throughout Europe**, which is made possible by and for our employees, who **meet the technological challenges of tomorrow with agile and innovative solutions**.

Thus, the choices we make are guided by values such as **transparency, equity, and sustainability**. The development of our activities, in Europe, is in a strong accordance with our desire to build long-lasting relationships with our clients and partners, based on mutual trust and interest. Moreover, each of our employees is an ambassador of these values, and acts with integrity in all circumstances and in all places. In fact, we consider that the respect of business ethics and the fight against corruption are imprescriptible and unavoidable rules.

Consequently, we wish to concretize our commitment through the present **Ethics Charter** that aims to formalize **our business ethics policy**, to set the **ethical standards** and **principles of reference for our employees**, and to bring them to the attention of all Alter Solutions stakeholders.

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OUR GROUP VALUES

We structure our management and business strategy based on 5 key values: **expertise, agility, transparency, equity, and sustainability**. These essential values guide us daily and ensure our continuous growth.

All our employees share the same vision as the company and bring these common values to life.

ETHICS AT ALTER SOLUTIONS

OBJECTIVES OF OUR ETHICS CHARTER

Alter Solutions is a group present in France and in several countries of the European Union. Its employees are therefore confronted to different ethical issues depending on each country.

This Code of Ethics aims to **set the standards** and **principles** that employees and associates of the group must follow when faced with ethical dilemmas in the workplace. In addition, it allows all Alter Solutions stakeholders to **act responsibly**. Beyond the legal aspect, it indicates the commitment of Alter Solutions in the general interest. This charter may evolve.

If an employee or a collaborator has a question regarding ethics, it is important to refer to this charter. For any questions, he/she can also ask his/her superiors for clarification. If the provided answers are unclear or incomplete, he/she can contact the Ethics Committee.

This Ethics Charter is **complemented by an alert system** put in place when an employee or a collaborator has doubts about practices that could affect the company.

IMPLEMENTATION OF OUR ETHICS CHARTER

This Charter is addressed to all entities of Alter Solutions and their subsidiaries as well as all employees, regarding all their activities.

The principles indicated in this Charter enable Alter Solutions to maintain and strengthen the trust of its customers and its stakeholders.

Each employee of the group must know, respect, and ensure that the values and commitments of this Charter are applied.

Non-compliance with all or part of this Charter may result in sanctions, in compliance with local regulations relating to disciplinary law.

OUR ETHICS COMMITTEE

In order to ensure the group's ethical approach, Alter Solutions has set up an Ethics Committee. It is composed of members appointed by the Board of Directors, on the proposal of the Group's General Management. Its goal is **to support the ethical approach of Alter Solutions**, and it **can be consulted for any question** related to the application of this Charter. It ensures the application of the Charter within the group and ensures the proper functioning of the alert system, in the context of its possible violations.

COMPLIANCE WITH LEGISLATION

Alter Solutions committed to respecting the laws and regulations related to the principle of loyalty applicable in the countries where it operates.

The Ethics Charter does not replace the policies and regulations of the various countries in which Alter Solutions is present. You must also consult the regulations and standards defined in your workplace.

It is the responsibility of each of the Group's collaborators and employees to know and comply with the national laws and regulations in force as well as the policies and directives of the company related to their areas of activity.

OUR COMMITMENTS AS A COMPANY

Alter Solutions aims to build and maintain lasting relationships based on trust with its customers, suppliers and subcontractors. This trust is built over the long term through the work of a continuous improvement process.

OUR CLIENTS

One of our priorities is the **satisfaction of our clients**. Thus, the group is very attentive to their requirements and ensures that the service provided is always of the highest possible quality. The relationship with customers is placed under the sign of honesty and transparency, which is one of our 5 values, in order to better understand their expectations and thus create value.

OUR SUPPLIERS AND SUBCONTRACTORS

Alter Solutions attaches great importance to the fair and transparent choice of suppliers. Thus, they are chosen according to a transparent, fair, and impartial purchasing and selection process that's based on predefined, explicit, and transparent criteria: **quality, cost, time**, and also taking into account the **environmental and social impact** of the products offered, and in accordance with our **Responsible Purchasing Charter**.

Alter Solutions treats its suppliers with honesty and fairness, in compliance with applicable laws and regulations, the payment of its suppliers in accordance with the terms mentioned in the contracts, and in compliance with payment deadlines, provided that they have fully fulfilled their obligations. Alter Solutions uses mediation to facilitate the friendly settlement of any disputes arising during the execution of the contract.

FAIR PRACTICES

Alter Solutions' suppliers adopt behave ethically in their business relationships and are committed to respecting the laws and regulations related to the principle of loyalty applicable in the countries where they carry out their activities. Thus, they ensure compliance with the rules of competition so that they are fair and equitable. Any unfair practice is prohibited.

GIFTS AND INVITATIONS

Alter Solutions employees should not engage in the practice of giving gifts or invitations, or any form of gratification. However, in some cultures and countries,

gifts and invitations can build stronger bonds and enhance the relationship between the two parties. When a gift or invitation is received during one's duties, it is important to inform one's superiors and be transparent.

It is important to ensure that gifts received are consistent with Alter Solutions' ethical principles

CORRUPTION AND CONFLICT OF INTEREST

In the pursuit of its activities, **Alter Solutions refuses and condemns all practices related to corruption or influence peddling.** We have "zero tolerance" for corruption. We fight against all forms of corruption, active or passive, and exclude any situation that could present a conflict of interest. It is essential to be careful regarding any practice that aims to influence a business decision.

It is essential for an employee to **inform his or her superior of any actual or potential conflict of interest** that could influence his or her judgment and decisions, in accordance with the alert procedure detailed in this document.

PRIVACY AND DATA PROTECTION

Alter Solutions is committed to keeping the technical, commercial, and financial information communicated by its suppliers confidential and to protecting their personal data by respecting the regulations in place. Customer information is kept secure. Before sharing any internal information with anyone outside of Alter Solutions, it is important to verify that it can be communicated. Furthermore, Alter Solutions is committed to only keeping the necessary data for its activities.

For further information, Alter Solutions defines **Privacy and Data Protection policies.**

PROTECTION OF COMPANY ASSETS

Each collaborator or employee of Alter Solutions must protect the property and resources entrusted to him in the course of their work. Its resources and assets must be used in connection with their professional activities.

FINANCIAL VERIFICATION

Alter Solutions is committed to ensuring that all its financial information is accurate and disclosed transparently. These financial documents are stored securely.

INDUSTRIAL AND INTELLECTUAL PROPERTY RIGHTS

Alter Solutions undertakes to respect intellectual and industrial property rights, and to comply with the rules of national and international law; it refrains from exploiting, by the manufacture, the sale, or the use of the property of a third party, consisting of any mark, patent, industrial design, or copyright.

OUR COMMITMENTS AS AN EMPLOYER

Alter Solutions is committed as an employer **to promoting a healthy and safe working environment** to its employees. Alter Solutions ensures that there is no **discrimination or harassment** of any form.

RESPECT OF HUMAN RIGHTS

We are committed to respecting and promoting the fundamental principles and rights as described in the Universal Declaration of Human Rights issued by the UN in 1948, as well as the working conditions required by the Conventions of the International Labor Organization (ILO) and complying with the legislation in force in each country where we operate. We also ensure the respect of Human Rights throughout our entire supply chain and monitor the practices of our suppliers.

HYGIENE, HEALTH, AND SAFETY

The health and safety of our employees and collaborators is one of our priorities.

We strive to maintain a safe and healthy working environment and comply with relevant regulations. We are committed to implementing a health and safety policy which aims to **guarantee each employee a working environment** that causes **no danger to their health and safety**, to **maintain an environment in which the dignity of people is respected** (agreements Nos. 155 and 120 of the ILO), and

to take all necessary measures to **limit work accidents** that may occur during an employee's routine tasks.

Alter Solutions provides training for its relevant employees about health and safety risks and performs detailed occupational risk assessments (occupational health and safety risks).

Each employee and collaborator must inform the safety manager of his site or his hierarchy in case of an accident as well as any installation that could endanger the safety of workers.

ABOLITION OF CHILD LABOR

Alter Solutions attaches particular importance to **the prohibition of child labor and forced labor**. Our suppliers are prohibited from employing children, as defined in the conventions of the International Labor Organization (ILO conventions n°138 and n°182).

PROHIBITION OF ALL FORMS OF FORCED LABOR

Under no circumstances should a supplier use forced and compulsory labor or slavery, or any other practice amounting to bondage or involuntary labor, as defined in the fundamental conventions n° 29 and n° 105 of the ILO.

WORKING TIME AND REMUNERATION

Alter Solutions commits to comply with all the regulations to which it is subject relating to remuneration, social benefits and working hours, in particular those related to the minimum wage, overtime pay, per diem wages and any other element of remuneration and limits of working hours and supplies (ILO Conventions Nos. 1, 30, 95, 100, 131, 163 and 171).

All forms of work, including overtime work, are voluntary. Workers are free to quit their jobs as long as they respect the notice period specified by law.

MORAL AND SEXUAL HARASSMENT

Alter Solutions refrains from using any verbal or physical threat, physical violence, sexual abuse or any form of harassment (ILO conventions n° 29 and n° 111). It is essential to be respectful towards each other and treat our colleagues as we would like to be treated. **Every collaborator and employee have the right to respect and human dignity.**

Moral harassment can be manifested in different forms, including:

- Incessant criticism, repeated sarcasm,
- Bullying, humiliation,
- Slandorous remarks, insults, threats,
- "Placing on the shelf", degrading working conditions,
- Refusal to communicate, absence of instructions or contradictory instructions,
- Work deprivation or excessive workload,
- Tasks that are meaningless or unrelated to duties,
- Etc...

Such behavior is unacceptable and has no place at all in Alter Solutions.

Sexual harassment in the workplace can also take many forms: blackmail for hiring or promotion, threats of retaliation for refusing sexual advances, etc. The person responsible of the harassment can be the employer, but also a colleague of the victim, a consultant in charge of recruitment, a client of the company, etc.

Whether victim or perpetrator, both sexes are affected.

In concrete terms, **we are uncompromising about these two forms of harassment.** We undertake to act immediately, and obviously, we are always ready to listen to the victim and/or the witness of this type of behavior.

DISCRIMINATION

Alter Solutions **prohibits any discrimination, exclusion, or preference**, based on race or ethnic origin, gender, religion or beliefs, political opinion, trade union activity, disability, age and sexual orientation in recruitment and career development and ensures equal treatment (ILO Convention No. 111). Alter Solutions offers awareness training on diversity, discrimination and/or harassment.

Besides, Alter Solutions commits to **promote equal treatment and equal opportunities** in accordance with fundamental conventions n° 100 on equal remuneration for men and women for all work of equal value and n° 111 on the principle of non-discrimination of the ILO. Alter Solutions also implements professional training which includes skills development training with the aim of professional development.

FREEDOM OF ASSOCIATION

Alter Solutions and its suppliers recognize **and respect the employee's right to freedom of association and collective bargaining** as defined in the fundamental conventions n° 87 and 98 of the ILO. They ensure the respect for independence and trade union pluralism and undertake to promote collective bargaining as a central element of social dialogue. Alter Solutions also recognizes the right of its employees and collaborators to join a trade union of their choice.

ALERT PROCEDURE

WHISTLEBLOWER RIGHT

The right to alert ethics is a right given to the collaborators and employees of Alter Solutions, allowing them to **report to the hierarchy a situation that does not comply with the principles set out in this charter.**

If an employee of Alter Solutions or any other stakeholder is confronted with facts, allegations, or behaviors likely to contravene the principles of this Charter, falling within the scope:

- Corruption,
- Anti-competitive practices and/or conflicts of interest,
- Personal data and information security breaches,
- Discrimination,
- Harassment,
- Violations of Human Rights (forced labor, child labor, or human trafficking, etc...).

The latter must react in accordance with the alert procedure detailed below.

HOW TO DO IT?

When an employee of Alter Solutions is confronted with an ethical problem or a breach of the rules of this charter, it is essential to report this incident on [the whistleblowing system](#) put in place by Alter Solutions Group. This report of incident can be fulfilled anonymously or not. All the information sent through this whistleblowing system will be received by all the members of the Ethics Committee. **The Ethics Committee list is available in the appendix.**

It is also highly recommended to inform the management of the incident and/or the Human Resources Department of the local subsidiary.

When the employee has given the alert, the Ethics Committee will be responsible for dealing with the alert as soon as possible. An investigation will be set up and will take place in a confidential manner where the anonymity of the whistleblower is guaranteed. Any information given during this survey will be communicated only to those who need to know this information (especially board members). No good faith report will be subject to threats or reprisals against the person who wrote it.

Following this investigation and depending on the seriousness of the breach, disciplinary measures will be decided and implemented, ranging from a simple reminder of this Ethics Charter to dismissal.

A report of the actual/announced facts will be written and improvements to our Ethics Charter may be made.

CONCLUSION

Alter Solutions undertakes to **guarantee the application of this Charter**, and the proper functioning of its alert procedure, by informing all its stakeholders, including employees, customers, partners, and suppliers, of the principles of this Charter, and by ensuring its proper promotion throughout its value chain, wherever the group operates.

Alter Solutions relies on the commitment and responsibility of everyone to carry the values of this Charter and continue to make ethical principles and the fight against all forms of corruption, discrimination, or violation of Human rights, essential and imprescriptible rules in business relations.

APPENDIX

Ethics committee's members

First name	Last name	Alter Solutions' subsidiary	Job title	Contacts
Fanny	COHEN	All AS' subsidiaries	HR Director	fcohen@alter-solutions.com +33 6 60 94 91 46
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