



## GROUP ETHICS AND VALUES CHARTER

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# GROUP ETHICS AND VALUES CHARTER

## Message from the Chief Executive Officer

The success, image and reputation of IN Groupe and its subsidiaries are the result of our commitment, our talents and our involvement.

Forging a reputation and building the company's image are unthinkable without uncompromising and impeccable ethics and compliance in the main areas of IN Groupe compliance, particularly in terms of prevention of corruption and influence peddling, compliance with antitrust regulations, protection of personal data, sanctions regimes, embargoes and export control....

Each employee must adopt exemplary behavior in their day-to-day working relationships, the principle of "zero tolerance" to be observed, in particular in matters of corruption, influence peddling and Antitrust being the rule.

For this reason, the Executive Committee is proactively committed to complying with the rules of conduct set out in this Ethics and Values Charter and asks each employee, regardless of their hierarchical level, to read and comply carefully with the provisions of this Charter.

The Executive Committee and I thank you for your vigilance and personal engagement in maintaining our group's integrity and reputation at the highest level, by applying the ethical and compliance principles shared by everyone on a daily basis.

Paris November 12, 2021

The Chief Executive Officer

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## Principle and use of this Charter

The purpose of this Charter is to establish a set of guiding principles which must be observed to ensure that all employees of IN Groupe and its subsidiaries share a common reference on business ethics.

It is one of the fundamental texts of the Ethics and Compliance policy and the Corporate Social Responsibility (“CSR”) policy of IN Groupe. It is supplemented by policies and procedures for ensuring its operational application.

This Charter includes IN Groupe’s main areas of compliance given the company's activities. It is a tool available to each employee.

Each employee is responsible for ensuring that their activities are carried out in full compliance with applicable laws and regulations and in accordance with the principles described in this Charter.

Therefore, whenever an employee feels they are faced with ethical or compliance issues, they must ask themselves the following questions:

- Is this legal?
- Is this consistent with IN Groupe’s values and the spirit of the Charter?
- Am I able to justify my choice with regard to business ethics?

Any breach of this Charter or the applicable laws and regulations runs the risk of IN Groupe seeing its image tarnished and its access to certain markets and the achievement of its objectives compromised. The employee responsible is liable to disciplinary action by IN Groupe.

Any employee who has questions regarding the implementation of the Ethics and Values Charter or an appropriate course of action in a particular situation may and must obtain the advice of their line manager and/or the Group Compliance Officer and/or the Corporate Secretary.

In addition, IN Groupe provides all employees with a whistleblowing mechanism guaranteeing confidentiality for reporting, in good faith, any suspected breach of the law or the company's Ethics and Compliance Policy. IN Groupe undertakes that no employee shall be discriminated against or suffer retaliation for issuing an alert.

## 1. ETHICS OF IN GROUPE EMPLOYEE BEHAVIOUR

### a. RESPECT FOR FUNDAMENTAL RIGHTS

#### i. Respect for human rights

IN Groupe undertakes to respect and promote the fundamental rights arising from the Universal Declaration of Human Rights, human dignity and worth, employee privacy and gender equality. In particular, IN Groupe ensures compliance with the principles set out in the UN and OECD Global Compact on Human Rights, Labour Standards and the Environment.

Similarly, IN Groupe respects the fundamental conventions of the International Labour Organisation (ILO) on freedom of association and the right to collective bargaining, elimination of forced labour and child labour.

Within the company, a shared living environment, it is important to encourage employees to co-exist peacefully through mutual respect and respect for each other's identity.

Any discrimination by an employee against other employees for any reason whatsoever shall not be tolerated.

IN Groupe and its subsidiaries are committed to promoting equal treatment among all of their employees and having fair employment practices.

We are collectively opposed to any form of discrimination, particularly on account of origins, customs, age, gender, political or religious opinions, individuals belonging to a trade union or disability.

#### ii. Slavery and forced labor

IN Groupe does not tolerate child labor in any form to contribute to its activities. It does not use forced labor or modern forms of slavery, such as forced labor, confiscation of identity documents, etc.

IN Groupe undertakes not to collaborate with partners (service providers, partners, subcontractors, etc.) who subject their employees to forced labor, servitude or slavery.

#### iii. Employment for the disabled

Aware of its social responsibility, IN Groupe pays particular attention to the recruitment and professional integration of disabled workers. IN Groupe complies with national laws and regulations relating to employment for the disabled.

#### iv. Gender equality

Gender equality is a key element of IN Groupe's Equal Opportunities Policy. IN Groupe prohibits any form of discrimination in this respect.

**v. Sexual and psychological harassment**

No employee must harass any other employee for any reason.

Harassment, whether sexual or psychological, is a violation of the law and makes the employee responsible, and possibly IN Groupe, liable to legal, financial and reputational consequences.

**vi. Occupational health and safety regulations**

As an employer, IN Groupe undertakes to provide a working environment that complies with environmental, health and safety laws and regulations.

However, we are all responsible for health and safety at work. Each employee must ensure that their actions do not cause or aggravate any risk to themselves or others.

They must report to their supervisor and the Human Relations Division any behaviour, facility or potential risk that could compromise the safety of their working environment, as well as any accident or incident of which they become aware.

**vii. Protection of confidential information**

As IN Groupe is partially involved in competitive activities, it attaches particular importance to the protection of its sensitive data: we must all consider any information not made public as confidential.

During their work, employees may be required to access and/or use certain confidential information such as costs, margins, contracts, wages, business strategies, customer lists and trade secrets.

This is not a complete list. The confidentiality of this information is key for IN Groupe's business to run smoothly.

No-one is authorised, other than under a secure contractual confidentiality framework, to disclose any such information to anyone (person, company, corporation, association or other entity) for any reason whatsoever, both during their employment with IN Groupe and after they leave.

Personal confidential information is employee information and will also be discussed in the section on privacy.

**GOOD PRACTICES**

- Keep all data secure, both paper and electronic, and ensure that unauthorised third parties do not have access to it.
- Limit the disclosure of confidential information within IN Groupe to people with a legitimate need to know it.
- Do not discuss or work on confidential information concerning IN Groupe in public places.
- Do not make disparaging remarks about IN Groupe or disclose internal or confidential information about it on social media.
- Do not disseminate passwords and logins or lend them to people.

**viii. Privacy**

Each employee must be treated with dignity and with total respect for their privacy.

IN Groupe is committed to ensuring that personal information remains confidential. The company restricts access to such information and its use solely to legitimate needs such as human resources management.

Any collection, use and disclosure of personal information is carried out in accordance with the internal rules in force and with the law, including those governing computer files.

**b. EMPLOYEE RESPONSIBILITY****i. Financial information and transactions**

The operations and transactions carried out by IN Groupe are recorded honestly and faithfully in each company's accounts, in accordance with current regulations and internal procedures.

Employees preparing accounting records shall at all times ensure that they are accurate and that documentation exists for each entry.

Any transfer of funds (incoming and outgoing) requires due diligence, including with regard to the counterparty's identity and the reason for the transfer.

**ii. Asset protection**

Maintaining the integrity of IN Groupe's assets is vital for its sustainability and we should all take action with regard to this.

Everyone must protect them from deterioration, loss, theft, damage, neglect and waste. These assets must not be diverted or used for personal purposes.

Assets include:

- Movable property (vehicles, furniture, computers, telephones, etc.);
- Production equipment, offices and business premises;
- Intangible assets identified and defined by law, and also ideas or know-how developed by employees in connection with their assignments. Lists of customers, prospective customers, subcontractors or suppliers, market information, technical or business practices, business proposals and technical studies, and data or information to which employees have access in the performance of their duties are part of IN Groupe's assets and must be protected.

**iii. Misuse of assets**

The misuse of company assets is an offence which, for any manager or their delegate, consists of knowingly using company assets, credit, powers or votes for personal direct or indirect purposes.

Breach of trust is an offence which, for all employees, consists of making use of an asset belonging to IN Groupe in a way which is contrary to what was agreed.

Misuse of assets is an offence which makes the perpetrator liable to criminal proceedings.

**iv. Reimbursement of expense claims**

Expenses incurred by employees in the performance of their duties or assignments shall be paid by IN Groupe in accordance with the procedures in force and in particular the limits relating to gifts and invitations.

**v. Compliance with delegations of authority and signature**

Delegations of authority or signature are an act of trust by the senior managers with regard to management and employees.

Employees who have received a delegation of authority or signature ensure that they comply with the terms thereof and only commit IN Groupe within the strict limits of the authority and delegations or sub-delegations granted to them. Behaviour contrary to this would be unfair towards the delegator and IN Groupe.

Any representative who grants special authority in writing to sign a deed, agreement or other document relating to a specific transaction or category of specific transactions shall do so under their sole responsibility.



## 2. ETHICAL RELATIONS WITH IN GROUPE STAKEHOLDERS

### a. BUSINESS ETHICS

#### i. Protection of personal data

IN Groupe undertakes to protect and treat with care all personal data it needs to know as a result of its activities. This undertaking is the subject of a specific strand of the GDPR compliance program, the main principles of which are as follows:

- Compliance with rules on the purpose of processing, the relevance of data, confidentiality, the retention period and the rights of individuals;
- The processing operations carried out by the Group which involve personal data must comply with the regulations in force as from when they are designed. The security rules for information systems must be followed from the outset of such processing operations;
- Any proposed exploitation, dissemination, transfer or sharing with a third party of personal data must be subject to due diligence by line managers and must be validated by the Data Protection Officer;
- Each IT administrator must know, understand and comply with the Network Administrator's Charter which stipulates that a level of security is implemented with regard to personal data in accordance with the regulations in force;
- Only the people who are authorised, due to their positions, may consult or use personal data for the sole purpose of the legitimate business need identified for the processing operation.

To ensure the personal data protection compliance program is implemented, a Data Protection Officer is appointed within the Group.

#### ii. Preventing breaches of competition law

IN Groupe complies with applicable national and international regulations in the field of competition law. It sets up mechanisms to identify, prevent and correct any act that would run counter to this objective, in particular by regularly providing awareness sessions to employees, the dissemination of guidelines and an associated policy.

The main principles of our policy are included in this Charter.

Free competition is a key success factor for IN Groupe in the markets in which it operates. In this respect, IN Groupe:

- Complies with the rules of competition law, in both its purchases and sales, in France and abroad, in the private or public domains ;
- Condemns any abuse of a dominant position and any cartel between competitors whose purpose or effect would be to prevent or limit competition.

Any incident or doubt concerning competition law must be brought to the attention of the Legal Department or reported via the Group's alert system to receive appropriate and diligent treatment.

Competition law mainly consists of combating two main types of anti-competitive practices: cartels and abuse of a dominant position.

- Abuse of a dominant position: it is illegal for a company to take advantage of its dominant position in a market (including locally) to block access to its competitors and hinder the initiatives of new competitors from entering the market with the objective of being able to control the market for its own benefit to the detriment of regulations on free competition and freedom of pricing ;
- Unlawful and illicit cartels: While cartels are not as such prohibited, especially when they contribute to progress, they can become so when their sole intention is to freeze the market, increase prices or even distribute customers. Thus, a so-called illicit agreement is a formal or informal agreement concluded between competing companies with the aim of slowing down competition, increasing or limiting the fall in prices in a market, whatever the scale (city, region, country). In practice, this may be market sharing, agreement on sale or purchase prices ...

Employees are prohibited from engaging in any conduct that would infringe competition law, and in particular:

- To participate in any meeting bringing together several competing companies, the explicit or implicit purpose of which would be to set prices or price changes on this market, to divide up markets, to discuss their respective strategies, etc.
- To exchange non-public information with competitors, such as for example strategy, product marketing, submission to calls for tenders, etc. Nevertheless, the study of the competition, its positioning, its projects and of its prices based on public data cannot be qualified, as such, as anti-competitive practices. Likewise, the communication of data to professional bodies for statistical purposes is acceptable.
- Obtain by any means whatsoever information not made public by its competitors.
- For information, it is recalled that anti-competitive practices are penalized not only by penalties but also by fines proportional to the turnover of the group (and not that of the offender) and can be very important (fines up to 10% of the turnover of the group of companies). They also tarnish the reputation of the group. It should be noted that non-compliance with these rules could also result in the declaration of the nullity of agreements made in violation of the rules of competition law and / or the prohibition to participate in calls for tenders for public contracts.

### **iii. Preventing and combating corruption and influence peddling**

Acts of corruption and/or influence peddling distort the normal, fair and equitable functioning of the markets.

IN Groupe is committed to complying with extraterritorial anti-corruption laws and those of the countries in which the Group operates, including the Sapin 2 Law, the UK Bribery Act 2010, the Foreign Corrupt Practices Act, the World Bank Integrity Guidelines, the OECD Guidelines and the Banknote Ethics Initiative (BnEI) requirements for the prevention of corruption.

Regardless of the circumstances and interests involved, preventing and detecting acts of corruption and/or influence peddling is essential for safeguarding IN Groupe's long-term interests.

This must be everybody's business: we have a collective obligation not to participate in acts of corruption and/or influence peddling, and a professional duty to do everything we can to help prevent or stop corruption if it is brought to our attention.

Corruption consists of making a proposal without any right (active corruption) or soliciting or approving a proposal (passive corruption) at any time, directly or indirectly to a public official (a person in a position of public authority, entrusted with a public service mission or chosen by the

electorate to represent public interests - corruption of a public official) or to a private agent (a person in a management position or who works for a natural person or legal entity or for any particular organisation, in the context of a professional or social activity - corruption of a private agent).

As a result, receiving, paying, offering or accepting bribes or granting undue advantages or promises, directly or through a paid intermediary, to an elected representative, agent of an administrative entity or private person for the purpose of obtaining favourable treatment or influencing the outcome of negotiations in which IN Groupe is involved is illegal and unfair towards the group.

"Facilitation payments" for carrying out or speeding up certain administrative formalities are also prohibited. These involve suppliers, customers, competitors, public authority representatives, any political party, politically exposed persons, etc.

Influence peddling refers to a person receiving - or soliciting - donations for the purpose of abusing their influence, whether real or supposed, over a third party for a favourable decision. 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 authority (public authority or administration, magistrate, expert etc.). Criminal law makes a distinction between active influence peddling (on the beneficiary side) and passive influence peddling (on the intermediary side).

An employee's participation in an act of corruption and/or influence peddling is professional misconduct, which is punishable without prejudice to any administrative, civil and criminal prosecution and sanctions.

The Anti-Corruption Policy and Anti-Corruption Code of Conduct that govern the anti-corruption mechanism and detail the applicable good practices are available on the intranet.

#### **iv. Gifts and invitations**

Gifts exchanged between business partners are civilities for establishing and maintaining business relationships.

Offering or receiving a gift should be an exception and of a reasonable amount and must be exclusively concerned with improving business relationships with customers and suppliers without being likely to alter the image and reputation of IN Groupe, its employees and leadership, both inside and outside the company.

Everyone must question whether a gift received or offered is likely to alter the impartiality of the recipient or is likely to give the person who instigated it the impression that this is the case. If the answer is yes, the gift must be politely refused or should not be offered. If there is any doubt, the line manager and/or the Group Compliance Officer and/or the Corporate Secretary may be asked.

In any event, employees undertake never to solicit them.

IN Groupe has a Gifts and Invitations Policy that governs gifts and invitations offered or received and all employees should refer to it.

#### **GOOD PRACTICES**

- Do not solicit gifts or invitations.
- Undertake to question the actual or perceived purpose of any gifts received.
- Do not offer or accept cash, coupons or gift vouchers.
- Regarding more specifically PEPs (Politically Exposed Persons), it is prohibited to:

- Assign, offer or promise cash payments, services, gifts or individual hospitality to persons of public authority in exchange for improper advantage;
- Use an intermediary or act as an intermediary to engage in such behavior. In the event that they are faced with such situations, employees should contact their superiors.

#### **v. Conflicts of interest**

Out of loyalty to IN Groupe, employees avoid any situation where their personal interests (or those of a natural person or legal entity to which they are related) might come into conflict with those of IN Groupe.

If there is a risk of conflict of interest or if there is any doubt, the employee must, in a spirit of loyalty and transparency, inform their line manager and the Chief Compliance Officer immediately and refrain from initiating or maintaining any relationship with the third party concerned until a decision is reached on the subject.

In order to limit the risk of conflict of interest, IN Groupe asks its employees in particular:

- Not to perform any professional activities for a supplier, customer or competitor.
- Not to hold any material financial interest in a supplier, customer or competitor of the company without prior written authorisation from their line manager notified to the Chief Compliance Officer.
- To notify their line manager and the Group Compliance Officer of any business relationship the company has with a parent, close relative or with a company controlled by a parent or close relative prior to the transaction or in any event as soon as they become aware of it.

#### **GOOD PRACTICES**

- Identify your actual, apparent or potential conflicts of interest and inform your line manager in writing.
- Do not become involved in IN Groupe decision-making when it concerns an entity in which you have, or a member of your family has, a private interest.
- Do not use your position within the IN Group, or the information obtained in this context, for personal gain or the gain of your family and close relatives.
- Do not work in a systematic or indeed abusive manner with a supplier in which a close relative has an interest.

#### **vi. Compliance with import and export sanctions and controls**

IN Groupe and its subsidiaries do not accept any import or export from or to countries for which sanctions (i.e. economic or commercial sanctions adopted, administered or imposed by the United Nations Security Council, the authorities of the United States or the European Union) prohibit the establishment of business relations.

As a result, IN Groupe and its subsidiaries strictly comply with the laws that apply to them, in all countries where they operate, and in particular the regulations relating to sanctions and embargoes (France, EU, UK, USA, UN, etc.) and the control of exports and re-exports of products to third countries (France, EU, UK, USA, UN, etc.), depending on the classification of products, end use, end users and customer countries.

IN Groupe and its subsidiaries are aware that the implementation of these regulations requires due diligence and that non-compliance with applicable regulations could have unacceptable consequences for the Group, its customers, and on an individual basis for the personnel causing this failure.

Everyone, at their level, must comply with the exportation and re-exportation restrictions imposed by the country of origin of the goods and technology and the protection of national products and know-how.

If there is any doubt, the Group Compliance Officer and/or the Corporate Secretary may be asked.

### **vii. Intellectual property**

IN Groupe allocates very significant financial and human resources to innovation and the creation of innovative products, processes and ideas in the technical, financial and commercial fields which are valuable assets in order to maintain its leading position in the industry. All such documents or information fall under intellectual, industrial and artistic property, or the know-how that is IN Groupe's strength.

Each of us must endeavour to protect them. Such protection includes measures such as passwords for electronic data, locked storage locations for paper documentation, careful processing of electronic or paper mail and refraining from holding confidential discussions in public places.

Employees shall also ensure that the intellectual property of others is respected. Appropriating information from third parties in the workplace which may be considered confidential is prohibited, as is using without permission, infringing or plagiarising any third-party intellectual property rights (including patents, copyrights, trademarks or trade secrets). Neither is anyone allowed to make illegal copies of the software used by IN Groupe or to use said software without authorisation.

### **viii. Preventing fraud**

Fraud is considered to be any deliberate and concealed act or omission committed with the intent of deceiving or bypassing existing laws or In Groupe's rules, in order to obtain unwarranted material or moral advantage for the perpetrator of the fraud or for a third party.

Fraud takes multiple forms: theft of money, goods or data, deliberate falsification, concealment or destruction of documents, false entries or declarations, the manipulation of accounts, counterfeiting and swindling. An employee's participation in an act of fraud is professional misconduct, which is punishable without prejudice to any legal proceedings and sanctions.

### **ix. Combating money laundering and terrorist financing (AML-CTF)**

Combating the laundering of the proceeds of illicit activities and the financing of terrorist acts are legal obligations which are also part of IN Groupe's societal commitments.

Money laundering is facilitating by any means the false justification of the origin of the property or income of the perpetrator of a crime or misdemeanour which has brought that person a direct or indirect benefit. Money laundering is also providing assistance in investing, concealing or converting such capital.

Terrorist financing consists of providing or collecting money to finance terrorist acts.

As such, entering into any relationship without knowing the true identity of the customer or partner is completely prohibited.

This is why IN Groupe carries out due diligence to check the integrity of any third parties with whom it is required to collaborate. These procedures consist of:

- checking the identity of the customer/supplier/partner at the beginning of the business relationship and during it,
- obtaining official and legal documentation tailored to the particularities of the natural person or legal entity,
- and implementing verification and certification measures for identity documents.

It is everyone's responsibility to know precisely who their counterparty actually is when entering into a relationship and to update this during the life of the relationship.

It is the responsibility of each operational employee to apply the procedures for assessing the integrity of third parties.

## **b. RELATIONS WITH SPECIFIC THIRD PARTIES**

### **i. Relations with the sole shareholder**

In accordance with the applicable rules, IN Groupe ensures that it provides its sole shareholder with ongoing, periodic or occasional information.

As such, the sole shareholder receives accurate, relevant and truthful financial information in a transparent manner.

IN Groupe is also required to comply with corporate governance principles and recommendations.

### **ii. Relations with suppliers**

In order to maintain a lasting relationship with its suppliers based on trust, IN Groupe undertakes to treat them fairly and honestly and in return expects reciprocity regarding process transparency. To this end, IN Groupe relies on the company's internal procedures such as the procedure for assessing third-party customers, suppliers and intermediaries.

These procedures are aimed in particular at governing work orders through a bidding or tendering system.

IN Groupe commits its suppliers and intermediaries to provide themselves, if they have not already done so, with ethical, compliance, environmental and societal rules, and also to comply with practices consistent with its values. Where applicable, tertiary real estate suppliers and developers adhere to the Responsible Purchasing Charter.

### **iii. Relations with customers**

IN Groupe employees must serve customers with due diligence, loyalty, neutrality and discretion. Customers are entitled to equal service by advising them in the fairest way and directing them to the

most appropriate offer. Employees are prohibited from proposing any schemes that they might think are not in the customer's interest. Employees carry out the assignment defined in agreement with the customer independently and transparently in accordance with the rules specific to their activity and refrain from putting their personal interests before those of their customers.

#### **iv. Lobbyists**

Lobbying is any action carried out by an organisation for the purposes of influencing public decision-makers. As regards lobbying actions, IN Groupe undertakes to comply with the legislation related to lobbyists.

IN Groupe has established a Lobbying Charter which governs the Group's lobbying actions and all employees should refer to it.

### 3. IN Groupe, THE ENVIRONMENT AND SOCIETY

#### a. SOCIETAL CONTRIBUTION

##### i. Patronage and Sponsorship

IN Groupe may occasionally carry out sponsorship and patronage actions when they meet its objectives of internal communication and mobilisation, or contribute to its civic engagement and image.

Such actions shall be carried out in accordance with applicable laws and regulations and must not in any way attempt to influence or give the appearance of influencing the decision of a potential customer or public decision-maker. Each action must be duly recorded and be subject to appropriate deliverables justifying its reality.

IN Groupe has put in place a Policy governing patronage and sponsorship actions. It is available on the intranet and all employees should refer to it.

##### ii. Social dialogue

IN Groupe respects the right of its employees to form or join their choice of trade union or workers' organisation and to organise themselves to participate in collective bargaining.

IN Groupe respects the role, representation and responsibility of staff representatives, providing them with the means necessary for their duties, and undertakes to communicate and negotiate openly with them on matters of collective interest.

##### iii. Political funding

IN Groupe respects the commitments of its employees who, as citizens, participate or wish to participate in public life. However, any employee concerned must refrain from morally or financially involving IN Groupe or any of its entities in these activities.

Similarly, any employee involved in the decisions of a state, government agency or public authority must refrain from taking part in a decision by that body that directly or indirectly affects IN Groupe.

Finally, and as an extension of this principle, IN Groupe does not provide funds or services to any political party or to any public mandate holder or candidate for such a mandate.

#### b. ENVIRONMENTAL PROTECTION

IN Groupe respects the environment and for several years has been engaged in a proactive approach to provide concrete responses to the challenges of energy transition and resource preservation.



Each employee endeavours to help reduce their own and their activity's environmental footprint:

- in their day-to-day work, they endeavour to reduce their consumption of paper, lighting, water and travel which causes pollution.
- when carrying out IN Group's business, they systematically take into account the environmental aspect at every stage: purchasing, development operations, site management and maintenance, works policy and renovation of the premises.

IN Groupe has set itself targets and put in place action plans for combating climate change, for sustainable mobility, for certifications and labels, for respecting biodiversity, for water and waste management and for sustainable materials.