



Anti-corruption Code of Conduct

IN Groupe

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MESSAGE FROM AGNÈS DIALLO

CEO

“It is our responsibility, both as a team and as individuals, to uphold integrity, transparency, compliance and ethics”



Dear colleagues,

A person's identity is their most precious asset. Protecting it is of paramount importance for us. We are proud to provide trusted services to our customers, and to help make society a safer place in the process.

It is our responsibility, both as a team and as individuals, to uphold integrity, transparency, compliance and ethics. These values provide an essential cornerstone for our company. Respecting these values has enabled us to build our reputation over the years and earn the trust of our stakeholders. Corruption and influence peddling are completely unacceptable practices at IN Groupe.

We are building an ambitious strategy thanks to the combined talents of all our professionals engaged around the world. This is why I expect all collaborators to set a good example in their daily working relationships, firstly with their colleagues but also with our stakeholders, such as partners, suppliers, existing or potential customers. This approach has been paramount to our past success and will be equally essential in the future.

This Code of Conduct summarizes the basic principles relating to anti-corruption and influence peddling, and will guide all IN Group colleagues to take the right decisions. It is imperative that we abide by these rules. This Code of Conduct will guide the work carried out by all of us within the Group and will help us take the best possible decisions.

This document has to be a point of reference in your **daily activities**. I am **counting on you** to ensure that the rules outlined in this Code are applied appropriately, to guarantee an ethical and safe future for our business activities.

01

Why

**an anti-corruption
Code of Conduct?**



What is IN Groupe's ethical commitment?

At IN Groupe, we believe that everyone's identity and data must be protected. Our goal is to make exchanges in the digital and physical worlds worthy of trust. This purpose drives our dedication to our customers, employees, and society at large.

Being a good corporate citizen, being a trusted partner and building trust between employees are only some of the commitments we have made to uphold ethical standards in all our business activities.

IN Groupe (hereinafter the «Group») has set up a specific compliance program to prevent and fight corruption, of which this Anti-Corruption Code of Conduct (hereinafter the «Code») is an integral part.

What are the objectives of the Code of Conduct?

The Code defines and illustrates the types of behavior to be avoided, as they are likely to constitute corruption or influence peddling.

However, it cannot claim to cover all the situations that employees may encounter.

It sets out the rules that should govern their decisions. It is therefore up to everyone to read and understand the rules

set out in this Code carefully, and to use their own judgment and common sense in dealing with the various situations that may arise.



Who is concerned by the Code of Conduct?

The principles of the Code of Conduct are relevant to all of us, extending beyond Group employees to include corporate officers as well as external and occasional collaborators.

This Code can be consulted on the Group's website. Its purpose is to remind everyone of the basic principles related to the fight against corruption and influence peddling.

In this respect, it applies to:

- The Group employees,
- the corporate officers
- external and occasional employees (temporary workers, suppliers providing services on site, trainees, etc.)

All our business partners are also expected to comply with the principles of this Code, maintain the same standards, and promote the principles of this Code among their own partners.

All IN Groupe employees must read, understand and

comply with this Code. Group management of each subsidiary will ensure that it is distributed and respected by all employees. This Code applies to the entire Group, its subsidiaries and its employees, regardless of their geographical location.

Any questions?

Should you require further clarification, the Compliance Department is available to answer any questions you may have.

It can be contacted at the following e-mail address: compliance@ingroupe.com.

How to apply the Code of Conduct

The principles and rules set out in the Code must be applied in all situations, except where local legislation is stricter than the rules set out in this Code of Conduct. In such cases, the stricter rule must be the reference.

The commission of an act of corruption or influence peddling is a serious offence which can have significant legal and financial consequences for both the perpetrator and the Group: it can result in financial penalties and lasting damage to the Group's reputation.

In order to combat corruption effectively, national and international legislations have been steadily increasing over the last few years, both in scope and in application.

IN Groupe's Zero Tolerance objective in terms of corruption and influence peddling is part of a regulatory environment that is both national and international.

In this context, the French law known as «Sapin 2» is the reference text for IN Groupe. In particular, this law establishes a general obligation to prevent and detect the commission, in France or abroad, of acts of corruption or influence peddling. It is not the only anti-corruption regulation.

THE FIGHT AGAINST CORRUPTION WORLDWIDE

United States

The FCPA is the reference law in the United States for bribery of foreign public officials. It applies to any person or company having a link or activities with the American territory.

Sweden

Corruption is dealt with under the Swedish Penal Code. Institutions in charge include the National Anti-Corruption Unit (*Riksenheten mot korruption*) of the Public Prosecution Service and the National Anti-Corruption Group (*Nationella anti-korruptionsgruppen*) of the National Police.

France

The main French law governing the fight against corruption is the law on transparency, the fight against corruption and the modernization of economic life, better known as the Sapin 2 Law.



Italy

The two main legislative texts governing the fight against corruption are the Criminal Code and Law no. 190/2012. The latter notably established the National Anti-Corruption Authority (*Autorità Nazionale AntiCorruzione*).

Germany

The German Criminal Code prohibits both active and passive bribery in the private sector involving employees or agents of a company, and/or bribery of public officials.

Netherlands

The Dutch Penal Code defines the framework for the fight against corruption for legal entities and individuals.

India

The two main texts governing corruption are the Prevention of Corruption Act (1988) and the Corporate Anti-bribery Code (2017), which punish corruption with prison sentences and fines. The latter also covers bribery of foreign public officials.

What are the penalties for non-compliance with the Code of Conduct?

Failure to comply with the rules laid down in this Code may have serious consequences, not only for the Group, but also for its employees. This may give rise to internal and external sanctions.

Any behavior contrary to the rules set out in this Code could damage the Group's reputation and affect our business, as well as exposing us to criminal prosecution.



Internal sanctions

The Code provides for disciplinary action to be taken in the event of non-compliance with the company's commitments and principles regarding the prevention and detection of corruption.

When circumstances justify it, the failure to comply with the rules outlined in the Code may expose employees to disciplinary action, up to and including termination of their employment contract under the conditions set out in the internal regulations, as well as to personal, criminal and/or civil proceedings.

Any business partner failing to comply with this Code may be subject to termination of all relations with IN Groupe.

External sanctions

Any employee who commits an act of corruption will face personal criminal liability, and in some cases, the companies within the Group may also be held liable. As mentioned above, employees guilty of corruption involving entities outside of France are also subject to local legislation and the Sapin 2 law, which applies to the entire Group, both in France and internationally.

FURTHER INFORMATION

In France, the offence of corruption may result in the following sanctions:

- Individuals: 5 to 10 years' imprisonment and a fine of 500,000 to 1,000,000 euros, or double the proceeds of the offence;
- Legal entity: 2,500,000 to 5,000,000 euros or double the proceeds of the offence, plus additional penalties. The same penalties apply to influence peddling as they do to bribery.



IF YOU HAVE A QUESTION

You can contact the Group Compliance Department.
compliance@ingroupe.com

02

Fighting
corruption



Defining corruption

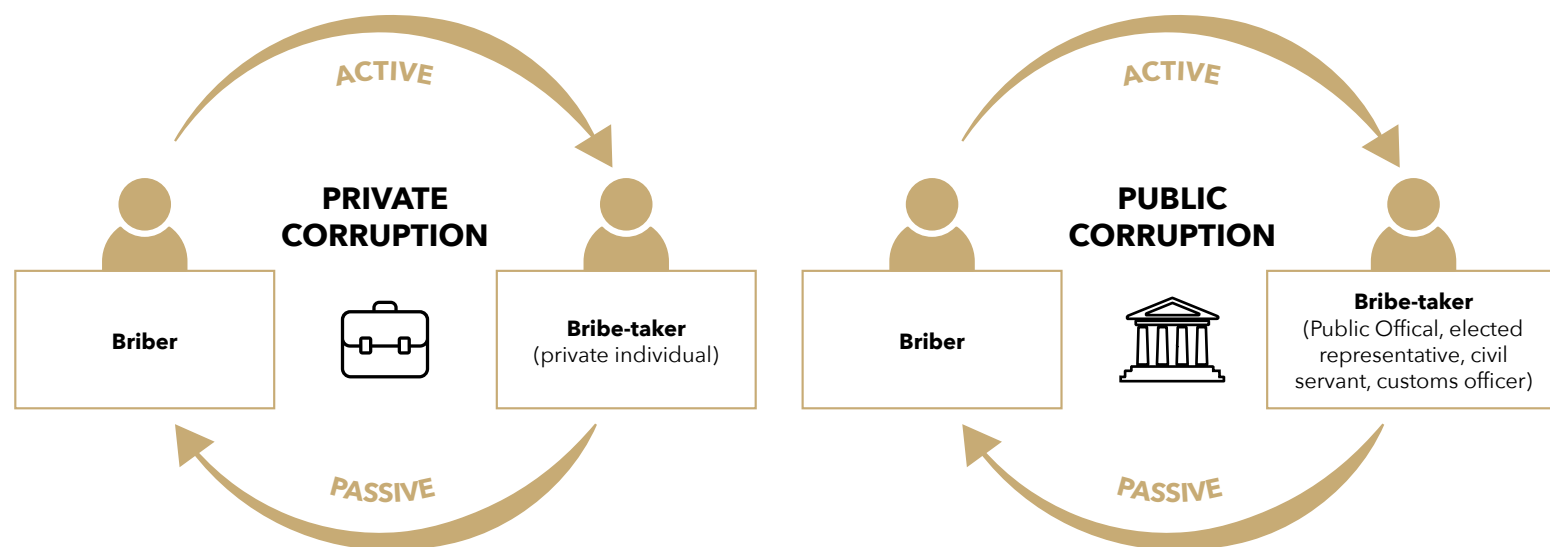
Corruption can be active or passive, but it can also be public or private.

Corruption is defined as the act by which an individual, holding a specific public or private function, solicits, proposes, accepts, or grants an undue advantage (such as money, gifts, offers, promises, etc.) to perform, delay, or omit an act that falls, directly or indirectly, within the scope of their duties.

Furthermore, **corruption can be classified as either active or passive**, depending on whether the individual is the one offering the bribe or the one receiving it. :

- Bribery is active for the person who bribes, i.e. the person who offers or grants a gift or undue advantage to a person invested with a public or private function, in the hope that the latter (the bribed person) will perform, delay or refrain from performing an act.
- Bribery is passive, for the person who is bribed, i.e. the person who performs or does not perform an act in exchange for a gift or undue advantage that he or she solicits or accepts.

Finally, **bribery is said to be public** when it involves people holding a public office (e.g. bribing a ministerial official to obtain a contract) and private when the bribery offence involves only individuals or legal entities in the private sector (e.g. bribing the CEO of a private company to renegotiate the terms of a contract).



Identifying situations of corruption

In order to conduct our business with integrity, it is essential to be able to identify corruption in all its forms.

The undue advantage solicited/ proposed or accepted/granted can take different forms:

- **Remittance of sums of money.** The means of payment may be concealed (false invoices, consultancy fees, donations, sponsorship, etc.), or payment may be made in a variety of ways: by cash, bank transfer or other means, discharge of

- the bribe-taker's debts, opening of a bank loan, etc.
- **Benefits in kind.** This may take the form of participation in sporting events, entertainment, travel, gifts, the hiring of family members or friends, work done free of charge in one's own home, etc. Gifts and invitations in the context of professional

relations (invitations to sporting events, airline tickets, hotel rooms, etc.) may be treated as corruption when they are disproportionate.



Lightbulb icon: An act of corruption does not require the undue advantage to be received directly by the individual concerned. The offense can still be established if the undue advantage is granted, for instance, to the individual's family or to a charity managed by persons close to the individual.

Furthermore, the mere fact of offering an undue advantage, even if this offer is refused or subsequently withdrawn, is sufficient to constitute an offence.

Lightbulb icon: The consideration for the undue advantage may be of various type including (not exhaustive):

- the award of a public contract,
- signing a contract,
- preferential treatment,
- disclosure of confidential information,
- cancellation of a control or audit.



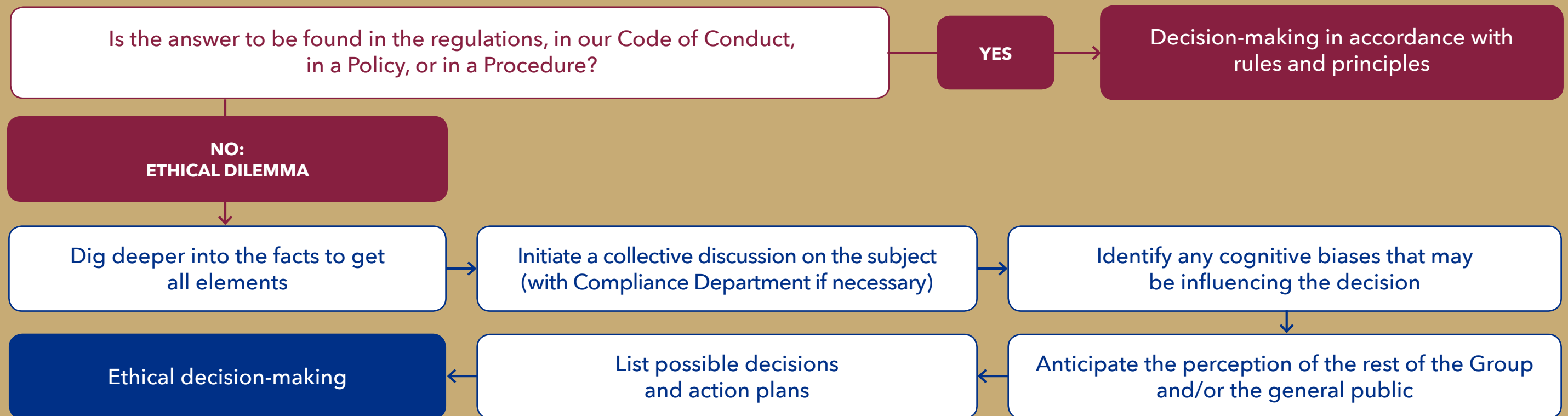
CASE STUDIES

A sales manager is asked by the chairman of a commission awarding a public contract for a sum of money in return for the preferential treatment reserved for the company in the award of the contract. He must categorically refuse this request, which would constitute an offence of active corruption on his part.

In the context of a call for tenders, a Purchasing Manager would be guilty of the offence of passive bribery if he awarded the contract to a potential supplier in return for accepting an invitation to an all-expenses-paid weekend from the supplier.

PRINCIPLES AND RULES

- Approach all your interactions with honesty, transparency and ethics
- Comply with Group policies and procedures as well as applicable anti-corruption regulations
- Identify and report to your line manager or to the Group Compliance Department any behavior that is inappropriate, opaque or does not comply with the Group's ethical standards.
- When in doubt, follow the steps for ethical decision-making:



Responding to facilitation payments

Facilitation payments generally involve small sums, but also constitute acts of corruption.

Facilitation payments are small sums paid to public sector agents to provide or «facilitate» services that we have a right to expect from them. For example, a payment to speed up the clearance of a product through customs is a facilitation payment.



PRINCIPLES AND RULES

Facilitation payments are prohibited, regardless of their frequency or amount, in France or abroad. These acts are liable to criminal prosecution for corruption.

The preservation of your physical integrity always comes first: if a situation puts you in danger, you will not be sanctioned for the payment of a facilitation payment. We invite you to report such situations to your line manager as soon as possible.



CASE STUDIES

During a business trip abroad, a border police officer disputing the validity of a Sales Manager's visa asked him for a «small cash settlement» in order to resolve the situation.

The employee must always refuse this type of arrangement. If the blockage persists, the employee is invited to report the situation to his or her line manager and to the Group Security Director.

A Prototyping Manager is offered a sum of money in cash to exert his influence in speeding up the process of issuing an identity document to an individual in his entourage.

In addition to the prohibition on receiving a facilitation payment, the employee is not authorized to provide information on securities issuance files. He or she must categorically refuse to accept this sum of money or to provide information, and must alert Group Compliance of this unjustified solicitation.



Distinguishing between corruption and influence peddling

An **act of influence peddling** is committed when a gift or undue advantage is offered or granted so that the beneficiary uses his or her influence, real or supposed, to obtain a favorable decision from a public authority.

Influence peddling is **passive** when a person solicits or accepts an advantage in order to use his or her influence, real or supposed, directly or indirectly, to obtain a decision favorable to the person who granted the advantage.

Influence peddling **occurs** when one person offers an advantage to another, or has yielded to the latter's solicitations, in order to use his or her influence, real or supposed, directly or indirectly, to obtain a favorable decision.

What's the difference between corruption and influence peddling?

Corruption involves a person who bribes and a bribe-taker: the bribe-taker abuses his power for the benefit of the person who bribes. Influence peddling adds a third party intermediary who abuses his influence with a decision-maker, to the benefit of the beneficiary of the decision.



BRIBERY

Offering an undue advantage to a public decision-maker so that he or she modifies the tender specifications in favor of the Group's technical specifications.

VERSUS
↔



INFLUENCE PEDDLING

Offering an undue advantage to a local company with close connections to the public decision-maker, so that this company obtains a change in the public tender specifications in favor of the technical specifications of the Group's products.

03

Conducting our business with integrity





Offer and receive gifts and invitations as part of a business relationship

Offering and receiving gifts and invitations as part of a business relationship is an act of courtesy.

Their sole purpose should be to strengthen business relations through a mark of esteem. To this end, gifts and invitations must be of proportionate and of reasonable value and frequency.

Standards concerning gifts, business meals and events vary according to the country, its customs, the company, the business relationship, etc.

In addition to complying with the values set out in this Code and with Group procedures, they must also respect locally-defined procedures.

The offer of gifts, invitations and other goods of value to a third party with the aim of obtaining, or which could be perceived as seeking to obtain, an undue advantage or any unjustified influence on any official decision/action is strictly forbidden.



PRINCIPLES AND RULES

- Gifts and invitations offered or accepted must not be intended to obtain an undue advantage or to influence anyone's action. As such, gifts, invitations or benefits of any kind must take place at a distance from any important decision-making (for example, the awarding or renewal of a contract).
- The circumstances of the gift or invitation must not be such as to give rise to suspicions of corruption, even a posteriori. Careful consideration must therefore be given to the context and meaning of a benefit or gift, which must not imply any expectation of a quid pro quo.
- Gifts of cash or cash equivalents such as gift vouchers are not permitted.
- Gifts and invitations are strictly for business purposes.
- Gifts and invitations may only be received or offered if they are not prohibited by local law. When authorized, the offering or acceptance of a gift or invitation must remain exceptional.



CASE STUDIES

A supplier invites a Human Resources Manager to spend two days at a trade show, including admission to the show, participation in a networking event and a closing dinner.

After consulting the Group's Gift and Invitation Policy, the employee concludes that the invitation exceeds the threshold for acceptance without prior authorization. In accordance with the dedicated procedure, she seeks her line manager's approval to accept the invitation.

After analysis, the line manager approves the invitation considering that:

- This is an exceptional item of reasonable value,
- The supplier and most of the sector's players take part in the event,
- This takes place at a distance from any major commercial decision-making phase.

Once this analysis and decision have been made, the employee cannot be suspected of favoring this supplier in return for accepting these approvals.

The employee can therefore accept the invitation and declare it via the dedicated platform, available on this [link](#).

Following the opening meeting of a safety certification renewal audit, the auditor asked the Quality Manager to take charge of her dinner at a Michelin-starred establishment.

This solicitation is likely to be interpreted as an undue advantage that could help obtain certification. The employee must inform the Compliance Department of this solicitation and refuse to cover the catering costs at this luxury establishment. On the other hand, it is possible to redirect them to an establishment in keeping with the professional nature of the interaction.

FURTHER INFORMATION

For a full description of the applicable rules, company employees can refer to the following procedures and documents:

- Group Gift and Invitation Policy
- Platform for declaring gifts and invitations: <https://app.witik.io/fr/login>



IF YOU HAVE A QUESTION

You can contact the Group Compliance Department.
compliance@ingroupe.com



Identifying and managing conflicts of interest

Conflicts of interest, whether actual, potential or perceived, must be declared in all cases to allow proper assessment and if necessary, appropriate action.

A conflict of interest arises when a Group employee's personal interest influences, or appears to influence, the performance of their duties.

Conflicts of interest may be real, potential or perceived.

- A perceived conflict of interest is a situation that a reasonable person would consider likely to compromise his or her objectivity.
- A potential conflict of interest is a situation that could turn into a real or perceived conflict of interest.

Conflicts of interest may arise in particular when your personal relationships, personal outside activities or personal financial holdings (non-

restrictive list) may have an impact on the objectivity of your professional decisions within the Group. To identify whether he/she is likely to be in a conflict of interest situation, each Group employee should ask himself/herself the following questions OR Conflicts of interest may arise, particularly when personal relationships, outside activities, or financial holdings (among other factors) could impact the objectivity of your professional decisions within the Group. To determine whether you might be in a conflict-of-interest situation, each Group employee should consider the following questions:

- Does this situation affect the performance of my duties?
- Would my loyalty and impartiality be called into question if my colleagues or anyone outside the Group knew of my personal interests?
- How would my line manager react if information about my personal interests were widely published?



PRINCIPLES AND RULES

Employees are invited to declare any absence or presence of conflicts of interest to their line manager using the Links Declaration Form, accessible on the platform for declaring links of interest at three points:

- From the moment anyone is recruited by the Group,
- if a Group employee is required to move internally,
- and where a real, potential or perceived conflict of interest is identified.



CASE STUDIES

A Purchasing Manager is considering consulting a service provider in which the partner of one of the group's employees holds a management position and a significant shareholding, because of its competitive prices and reputation.

In this situation, the employee concerned must declare the existence of this potential conflict of interest via the dedicated platform. After analysis by the Compliance Department in consultation with the Purchasing Department, the decision is taken to continue with the consultation, provided that the employee in a potential conflict of interest situation is removed from any further decision or involvement in the project.

A Programs Manager receives the CV of the son of a high-ranking foreign civil servant, for an internship application. The civil servant stresses the importance of this internship for his son, pointing out that it will strengthen relations between his government and the Group.

She politely refuses to recommend this CV, but redirects it to the Group's standard recruitment process, making it clear that she herself will not be making any decisions in the matter.

A Marketing Director is also a member of the board of an association fighting against poor housing. He learns that his group has decided, without his involvement, to make a donation to an association active in the same sector.

Employees are invited to declare their interest via the dedicated platform. His or her absence from decision-making on the donation will be formalized to avoid any perceived conflict of interest.

FURTHER INFORMATION

For a full description of the applicable rules, company employees can refer to the following procedures and documents:

- Group procedure for declaring conflicts of interest



IF YOU HAVE A QUESTION

You can contact the Group Compliance Department.
compliance@ingroupe.com



Evaluate our customers, suppliers and other third parties

Before entering into a commercial or contractual relationship, it is imperative that we thoroughly assess the integrity of our third parties (screening) to ensure that their ethical standards are consistent with those of IN Groupe.

In the course of their activities, the Group has dealings with numerous third parties, companies or individuals both in France and internationally, including in particular:

- beneficiaries of patronage or sponsorship,
- customers and consortium partners,
- suppliers,
- intermediaries (agents and resellers/distributors).

These professional relationships are binding on the Group: potential sanctions or acts of corruption, influence peddling or other breaches of probity on the part of these third parties could damage the Group's reputation.

The Group has set up a procedure to identify, update, assess and mitigate the risks of corruption or influence peddling in its commercial or contractual relations/ dealings with third parties. It provides recommendations regarding the initiation, continuation or termination of relationships with third parties.



PRINCIPLES AND RULES

- Before entering into a business relationship with a business partner, an assessment of the third party's integrity must be carried out in accordance with internal procedures;
- Employees must be alert to any element that could give cause for concern about the integrity of the partner with whom they engage. Several indicators should prompt employees to exercise caution or contact the Compliance Department, such as (but not limited to):
 - a notoriously bad reputation,
 - an obvious lack of transparency in exchanges,
 - the absence of any real expertise on the project,
 - unjustified high remuneration,
 - a strong recommendation from a customer to hire the third party,
 - the identification of strong links with public officials.



CASE STUDIES

A potential Group supplier refuses to provide the information required for the screening process.

In order to convince her, her contact in the Purchasing Department has to explain that this process meets the Group's legal obligations in the fight against corruption, and that her reluctance will prevent the Group from entering into commercial relations with her.

During the screening process for a potential customer, negative press reports likely to damage the customer's reputation are identified.

The Group Compliance Department contacts the teams concerned to examine these elements in greater depth, and to decide on the conditions of collaboration with this third party:

- If possible, risk mitigation measures can be put in place.
- If these elements reveal ethical standards incompatible with those of the Group, business collaboration could be called into question.

When negotiating the terms and conditions of a contract with an intermediary who has key relationships abroad, the Sales Manager must categorically refuse the intermediary's request for excessive remuneration, including a cash component, and make it clear that the Group prohibits this type of arrangement. Indeed, the intermediary could use these sums as an undue advantage, in order to corrupt the person in charge of awarding the contract.

FURTHER INFORMATION

For a full description of the applicable rules, company employees can refer to the following procedures and documents:

- Third-Party Integrity Assessment Group procedure



IF YOU HAVE A QUESTION

You can contact the Group Compliance Department.
compliance@ingroupe.com



Interacting with Politically Exposed Persons (PEPs)

PEPs are considered to be exposed to a higher risk of corruption, money laundering and favoritism due to their links with public, political, judicial or administrative spheres. Interacting with PEPs requires extra vigilance.

IN Groupe considers a PEP to be any person who is a Public Official, a member of the family of a Public Official or a person with close ties to a Public Official.

A Public Official is any person who meets one or more of the following criteria:

- Holding or having recently held a legislative, administrative, military, judicial or elective office,
- Holds or has recently held a position in a national, regional or municipal government,
- Holds or has recently held a position in a government-owned agency or company,

- A member of a royal or ruling family,
- Current or former representative or employee of a public international organization or political party,
- A candidate for elective office,
- Any person acting on behalf of a person meeting the above criteria.

A family member of a Public Official is any person meeting one or more of the following criteria:

- Spouse, partner, child, brother, sister, father, mother, spouse of children, spouse of brothers and sisters, life partner of a person corresponding to the definition of Public Official.
- The concept is extended to cousins if the person concerned holds a particularly significant political position (head of state, minister, etc.).

A person with close ties to a Public Official is any person who is known or clearly appears to be associated with a Public Official (company co-shareholders, close advisor, etc.).



CASE STUDIES

To support its response to a public invitation to tender abroad, a Program Manager is asked to engage the services of a local interest representation company, owned and managed solely by the close relative of a member of the government.

After alerting the Group Compliance Department to this solicitation, the employee refused the services of this consulting firm. To pay for the services of this company would expose the Group and the employee to the offence of influence peddling.

FURTHER INFORMATION

IN Groupe is particularly vigilant in identifying the PPE with which the Group interacts:

- Third-Party Integrity Assessment Procedure
- Ethical Lobbying Policy
- Declaration of Conflicts of Interest Procedure



PRINCIPLES AND RULES

- We need to be vigilant when it comes to assessing the conditions of interaction with PEPs from outside the company.
- PEPs present within the Group must declare any potential conflicts of interest as part of the procedure for declaring conflicts of interest as an external personal activity.



IF YOU HAVE A QUESTION

You can contact the Group Compliance Department.
compliance@ingroupe.com



Respecting the framework of interest representation actions

Interest representation (or lobbying) refers to any action taken by a Group interest representative to influence or inform a public official, in France or internationally.

Lobbying, or interest representation, is considered a valid and acceptable activity when it is conducted under strict supervision and follows a set of ethical guidelines relevant to the specific issues being addressed. When these conditions are met, lobbying can play a positive role in helping public officials make well-informed decisions by providing them with valuable information and perspectives.

Because of its activities and its public-sector clients, the Group may be required to take part in the dialogue that accompanies the drafting of regulations in the countries in which it is established or operates, when these are likely to affect its activities.

Any interest representation actions undertaken by the Group are intended to defend the Group's interests and provide public decision-makers with technical expertise on the consequences and practical scope of current or proposed legislation.

Representation of interests must take place within a clear and transparent framework. Under no circumstances should it involve any exchange that constitutes corruption, such as offering an advantage to a public official in order to induce him or her support for legislation or activities favorable to the Group.



PRINCIPLES AND RULES

- Demonstrate integrity, intellectual probity and transparency in all dealings with public officials, whatever the situation or interest.
- Provide reliable, objective information, without seeking to obtain information or decisions by exerting pressure of any kind.
- Do not seek undue political or regulatory advantage.
- Ensure that interest representatives:
 - have been screened for integrity and quality.
 - carry out their activities in compliance with this Code, the Group Charter for Responsible Interest Representation and applicable regulations,

What is an interest representation activity?

An interest representation policy is initiated by the interest representative, targets a public official and is intended to influence an existing or future public decision.

Several types of communications are likely to constitute interest representation actions:

- A physical meeting: this could be an appointment, a business lunch, a visit to a trade show or club meeting, etc. ;
- A remote conversation: this can be a telephone conversation, by video-conference or via an electronic communication service (WhatsApp, Telegram etc.) ;
- Addressing a public official: This may involve sending a letter, e-mail or private message via an electronic communication service. The same applies to the direct and nominative interpellation of a public official on a social network.



CASE STUDIES

The Group is a member of a trade association bringing together players in the biometrics sector. The missions of this trade association include exchanges with public decision-makers concerning industry regulations, in the name and on behalf of the association's members.

Through this membership, the Group participates in interest representation initiatives insofar as some of the association's exchanges could be intended to influence an existing or future public decision. It is advisable to discuss this with the Group Communications and Institutional Relations Director, in order to be guided through the steps and rules to be respected for responsible representation of interests.

FURTHER INFORMATION

For a full description of the applicable rules, company employees can refer to the following procedures and documents:

- Group Charter for responsible interest representation
- Group procedure for declaring conflicts of interest



IF YOU HAVE A QUESTION

You can contact the Corporate Communications and Relations Department and the Group Compliance Department.
compliance@ingroupe.com



Participate in sponsorship operations

Patronage and sponsorship are commitments that enable IN Groupe to participate in its development and social responsibility. However, a framework is needed to ensure that these operations are in line with the Group's strategy and are not used to obtain or appear to obtain improper consideration or advantage.

Patronage is financial or material support without any direct or indirect counterpart on the part of the beneficiary, and aimed at image, social responsibility and strategic objectives. Patronage can take the form of monetary or non-monetary/in-kind donations.

Sponsorship is financial or material support in exchange for tangible consideration (an item of value or benefit that is lawful and proportionate to the value of the financial support and that can be objectively documented) from the beneficiary.

Sponsorship by the Group of events or projects organized by third parties may be provided in monetary or non-monetary/in-kind contributions. Such sponsorships must only cover elements that are relevant or useful to the event's program.

These actions enable us to associate ourselves with events, projects and activities that meet our eligibility criteria, in order to increase the interest and visibility of our activities among all our stakeholders.



CASE STUDIES

A potential customer contacts the Marketing Manager to request funding for an event he is organizing. In less than a month's time, this potential customer will be issuing a call for tenders, which the group wishes to respond to.

The Marketing Manager must refuse this solicitation: sponsoring this event could appear as an undue quid pro quo for winning the tender.



PRINCIPLES AND RULES

- Patronage or sponsorship actions must not be used to obtain or appear to obtain undue consideration or advantage.
- All patronage and sponsorship must be reviewed, approved and formalized by means of a duly signed agreement before the start of the supported event or project.
- All sponsorship must be registered via the dedicated register.

FURTHER INFORMATION

For a full description of the applicable rules, company employees can refer to the following procedures and documents:

- Group procedure for patronage and sponsorship



IF YOU HAVE A QUESTION

You can contact the Corporate Communications and Relations Department and the Group Compliance Department.

compliance@ingroupe.com



Comply with public procurement regulations

It is crucial to ensure fairness, transparency and fair competition in our contract awarding processes. Failure to comply with these rules could be construed as favoritism and risk undermining the confidence of our stakeholders.

Imprimerie Nationale SA, the Group's parent company, is a French government-owned entity. As such, it is subject to public procurement law. The Group is also subject to the same rules in the case of contracts awarded by other public purchasers to which Group entities may respond.

Favoritism is the offence of procuring or attempting to procure for another person an **unjustified advantage** by an act contrary to the legislative or regulatory provisions designed to guarantee freedom of access and equality of candidates in public procurement and concession contracts. In other words, it is a question of distorting the rules of public procurement, whether or not in exchange for something in return.



PRINCIPLES AND RULES

It is fundamental for the Group to respect the main principles of public procurement:

- **Freedom of access:** guaranteeing that any eligible operator can bid for a contract
- **Equal treatment:** operators must be treated equally in an identical situation
- **Transparency:** all terms and conditions of the procedure must be set out clearly and precisely



CASE STUDIES

In the context of a project subject to public procurement, a potential supplier suggests to the specifying employee (in charge of drawing up the tender specifications) that the same project be divided into several separate orders, in order to avoid a competitive bidding process and speed up the employee's project, which is already well behind schedule.

Employees must refuse to «split up» the services provided under a public procurement contract, and report any such requests to their line manager and to the Purchasing Department.



FURTHER INFORMATION

If employees have any questions about public procurement, they can contact the Purchasing Department.

Keep accurate books and records

In the fight against corruption, it is essential that transactions are transparent, fully documented and allocated to accounts that accurately reflect their nature.

Books and registers refer to all accounting, financial and commercial records. These include accounts, correspondence, summaries, books and other documents relating to the accounting, financial and commercial spheres.



PRINCIPLES AND RULES

- No entry in IN Groupe's books and records may be unfounded, erroneous, falsified or fictitious.
- The Group's books and records must be a true and accurate reflection of the transactions carried out, and must be prepared in accordance with applicable accounting standards and guidelines.
- All Group controls and approval procedures must be applied.
- Documentation must therefore be kept to demonstrate the appropriateness of the services concerned and the corresponding payments.



04

Speaking out





What is a whistleblowing tool?

IN Groupe encourages the reporting, in good faith, of any behavior or situation that may violate our Code or the regulations to which we are subject.

IN Groupe has set up a whistle-blowing system designed to strengthen the means of expression of all employees, so that they can report the existence of conduct or situations contrary to this Code, particularly those that may constitute acts of corruption or influence peddling. IN Groupe encourages and supports anyone reporting a concern in good faith, and does not tolerate reprisals against them.

While recourse to the hierarchical channel is always possible, the whistleblowing system offers employees enhanced guarantees of protection in the event of a report being made.

In practice, any employee can submit a report using the secure Centralized Alert Platform at the following URL: <https://ingroupe.integrityline.app>.

This secure platform, which collects and manages all exchanges and information relating to alerts, is available :

- 7 days a week, 365 days a year;
- Regardless of the country in which the originator of the alert is located;
- in French, English, Swedish, Italian and German.

It can be accessed from any Internet-connected device (computer, tablet, smartphone).



Who can issue an alert?

The following persons may issue a warning and be eligible for whistleblower protection:

- **permanent Group employees** ;
- **temporary employees** (fixed-term contracts, interns, apprentices, work-study students, etc.);
- **former Group employees**, when the information that is the subject of the alert was obtained as part of their employment contract;
- **applicants for a job** offered by the Group, when the information to which the alert relates was obtained as part of the application process;
- **external and occasional employees** (temporary staff, employees of service providers, agents, etc.) of the Group;
- the **Group's co-contractors** (customers, suppliers, subcontractors, partners, consultants, service providers), their subcontractors, members of the administrative, management or supervisory bodies of these co-contractors and subcontractors, and members of their staff;
- **shareholders, associates and holders of voting rights at the Group's Annual General Meeting** ;
- **members of the Group's administrative, management or supervisory bodies.**

Who handles the alert?

From the date of acknowledgement of receipt of the alert, the maximum period for examining the admissibility of the alert is 30 calendar days. Alerts will be handled independently and confidentially, to the limit of exceptions arising from the law or applicable legal proceedings, by the **Investigations Unit**.

If one or more members of the Investigation Team is affected by the alert, he/she will not be able to attend.

What protection does a whistleblower have?

Whistle-blowers who fall within the scope of the system are offered several guarantees in connection to their reporting:

- **Confidential handling of alerts.**
- **Protection against any reprisals, threats or attempts to take such action.** This includes, in particular, immunity from any disciplinary sanction/ action for whistle-blowers who act in good faith, even if the reported facts are ultimately found to be inaccurate or do not result in any follow-up action.
- **Criminal irresponsibility under certain conditions:**
 - when the whistleblower has lawful knowledge of the facts;
 - when such disclosure is necessary and proportionate to safeguard the interests involved;
 - and when it complies with the reporting procedures defined by law.

- **No civil liability for** any damage caused by the whistleblower's report or public disclosure, where the whistleblower had reasonable grounds for believing that the report or public disclosure of the full information was necessary to safeguard the interests at stake.

On the other hand, misuse of the system could, if proven, may subject the reporting individual to disciplinary sanctions and, if necessary, legal proceedings.

Any obstacle to the transmission of an alert is punishable by law.

FURTHER INFORMATION

For a full description of the applicable rules, company employees can refer to the following procedures and documents:

- Whistleblowing Mechanism Procedure (reporting and processing alerts)
- [Reporting and alert management platform](#)



IF YOU HAVE A QUESTION

You can contact the Group Compliance Department.
compliance@ingroupe.com



**SUBMIT A REPORT
IN COMPLETE
CONFIDENTIALITY**



USEFUL RESOURCES AND CONTACTS



Intranet

IN Groupe provides its employees with all the documents mentioned in this Code on the Group intranet. Each employee can refer to it at any time in case of doubt.



Ethics and compliance network

To help disseminate this Code and the applicable procedures, IN Groupe has set up a network of Ethics and Compliance ambassadors. Their mission is to relay employees' questions to the Compliance Department, and to help ensure that the principles of this Code are properly applied.

To find out who their local Ethics and Compliance ambassador is, employees can contact their Human Resources department or the Compliance Department.



Contact

The Compliance Department is also at the disposal of any employee wishing to clarify any point of this Code or the procedures mentioned herein.

For further information on this Code, please contact the Group Compliance Department at compliance@ingroupe.com.

