



# Code of Conduct **Commercial Partners**

**IN Groupe**

# INTRODUCTION MESSAGE

## AGNÈS DIALLO

CEO

**"We have a duty to uphold the values of integrity, transparency, compliance and ethics, both collectively and individually."**



## Dear commercial partners

A person's identity is their most valuable asset. We take great pride in providing trusted services to our customers, and in making society safer in the process.

At IN Groupe, we consider integrity, transparency, compliance and ethics to be essential principles of our business. Adherence to these principles has enabled us to build our reputation year after year and earn the trust of our stakeholders. It is an essential

foundation of our past and future success.

We can only build a sustainable future with commercial partners which share our demand for exemplarity. This is why we expect our partners to commit to adopting standards equivalent to our own in their business conduct and in their interactions with IN Groupe.

This Code of Conduct formalizes the commitment of the Group and its partners to preventing and combating all forms of probity breaches. It must be respected in all circumstances and serves as a mark to guide our day-to-day decisions and behavior.

# 01

## Preamble

IN Groupe aims to build lasting relationships with its suppliers, customers, agents and resellers (hereinafter referred to as «**Commercial Partners**» or "**Partners**"), based on trust, transparency and integrity.

This Code of Conduct describes the requirements to which Partners must adhere when doing business with IN Groupe.

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## Key principles



Comply  
with applicable  
regulations

Partners must comply fully with all laws and regulations applicable in the countries in which they operate, in particular regarding the fight against corruption and influence peddling.

- Partners must ensure compliance with these regulations by implementing appropriate internal policies & procedures and a framework to prevent, detect and punish any breach of probity.







## Zero tolerance for corruption and influence peddling

Corruption and influence peddling are never acceptable practices.

► No Partner shall, directly or through an intermediary, offer, promise, grant or accept a sum of money, a gift, an invitation, a service or any other advantage in order to obtain preferential treatment. This includes facilitation payments; small sums paid to public sector officials to provide or «facilitate» services that we have a right to expect from them.

► No Partner shall seek to obtain an unfair advantage by using, or by having a third-party use, real or supposed influence over a public authority. Such practices are prohibited even when they appear to be tolerated locally.

► Partners must ensure that their business practices, internal policies & procedures and contractual provisions clearly prohibit all forms of corruption and influence peddling, and that their employees are regularly trained and made aware of the associated risks.



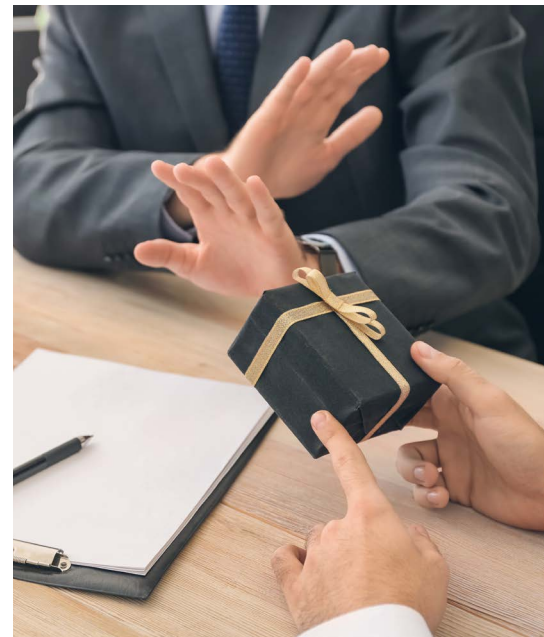
## Exchanging gifts and business invitations in a limited, punctual, reasonable and proportionate manner

IN Groupe recognizes that the limited exchange of gifts and the occasional organization of invitations may be part of professional practice. However, these practices must never be used to influence, or appear to influence, a decision.

► Partners must only offer or accept gifts or invitations of reasonable value, in accordance with applicable laws and internal rules.

► Gifts of cash or cash equivalents (e.g. gift vouchers) are strictly forbidden.

► Any gift or invitation must be justified by a clear professional objective, take place in an appropriate context and be granted in a transparent manner.





## Preventing conflicts of interests

A conflict of interest arises when a personal interest influences, or appears to influence, a person's objectivity in carrying out his or her responsibilities.

This may include, for example, the existence of close family ties with IN Groupe employees involved in a decision, or the holding of strategic financial interests in a competitor, client or supplier of IN Groupe.

- Partners must disclose any potential or perceived conflict of interest to IN Groupe as soon as it is identified, in order to mitigate it as soon as possible.



## Complying with public procurement rules

Public procurement is subject to stricter rules on transparency of procedures, equal treatment of candidates, prevention of conflicts of interests and business ethics.



- When their activities involve bidding for a public contract, in France or abroad, Partners must comply with the requirements of regulations relating to public procurement.

- In general, Partners must exercise increased vigilance in their interactions with public officials, so as not to influence or appear to influence the award or conditions of a public contract.



## Compliance with export control and economic sanctions regulations

We expect our Partners to comply with export control regulations (such as, but not limited to: EU dual-use regulations, US export administration regulations) and economic sanctions (such as, but not limited to: EU economic restrictive measures, French asset freeze list, UK sanctions, US sanctions, UN sanctions, embargoes).

- ▶ Partners must not accept any imports or exports from or to countries for which sanctions prohibit the establishment of trade relations.
- ▶ Partners shall not establish any business relationship with any natural or legal person, entity or body designated on a sanctions or freeze list maintained by the United Nations Security Council, the United States, European Union or United Kingdom authorities, or with any natural or legal person, entity or body associated with such persons, entities and bodies.
- ▶ Where applicable, Partners have put in place internal procedures to prevent and detect any risk of non-compliance with these regulations.
- ▶ IN Groupe and its subsidiaries refuse any direct or indirect commercial activity with Russia, Belarus, Russian-controlled Ukrainian territories, Iran and North Korea. As such, Partners are not authorized to resell, sublicense or otherwise transfer IN Groupe's products and services or the rights to use them to any entity or person in these territories, or for the use of entities whose controllers are located in these territories.
- ▶ Likewise, IN Groupe and its subsidiaries refuse any business relationship with governments that are not recognized by the international community, unless French diplomacy has taken favorable steps towards official recognition. As such, Partners are not authorized to resell, sublicense or otherwise transfer IN Groupe's products and services or the rights to use them to any entity, person or institution affiliated with, but not limited to, governments not recognized by French and European diplomacy.
- ▶ Partners agree to proactively provide any information relating to their cooperation that may have an impact on IN Groupe's exposure to various regulations related to international sanctions and export controls. In the case of suppliers, such information includes, but is not limited to, the transmission of information relating to the potential regulatory framework for the export of goods sold to IN Groupe.







## Respecting the principles of fair competition

Partners must comply with all applicable fair competition and antitrust regulations.

- Partners must refrain from anti-competitive practices such as (but not limited to): agreeing with competitors on prices, sales conditions or contractual terms, exchanging commercially sensitive information, sharing customers, markets or geographical areas with competitors.



## Reporting on any concern about a behavior or a situation

A whistleblowing mechanism (<https://ingroupe.integrityline.app>) is made available to all Partners to allow them to report any situation or behavior likely to constitute a breach of applicable regulations or of the principles of this Code of Conduct.

Reports are treated with strict confidentiality, and no retaliation may be taken against a Partner who has made a report in good faith, even if the facts reported are ultimately considered as not characterized.

The process and associated guarantees are described in the [Whistleblowing Procedure](#).



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## Useful contacts

Do you have a question, doubt or need clarification concerning the application of this Code of Conduct?

You can contact IN Groupe Compliance Department directly at the following address: [compliance@ingroupe.com](mailto:compliance@ingroupe.com)

