



## Code of Conduct (CoC)

# Introduction

A formal Code of Conduct (CoC) is a common Corporate Social Responsibility (CSR) or Environmental, Social and Governance (ESG) tool used by companies to establish and communicate responsible business practices and an ethical organisational culture. The purpose of this document is to explicitly outline the expected behaviour of **LISAM**<sup>1</sup>'s associates and to establish guidelines within the organisation and its subsidiaries in relation to our values:

- Respect: Without exception, treat everyone with dignity and respect - customers, employees, partners, suppliers, competitors and strangers.
- Integrity: Always be honest and don't make promises unless you know you can keep them.
- Service Excellence: No matter how powerful our software solutions, none of it matters without the passionate customer service that ensures your success. We are committed to our customers and to service in general.
- Value: Time and resources are precious. We strive to create value in everything we do by delivering the highest quality and most affordable solutions to our customers.
- Happiness: We believe it's easier to help customers achieve more secure and sustainable success if we have fun along the way and promote everyone's wellbeing. Achieving challenging goals with a servant's heart can bring its own satisfaction and happiness. Making our work and our workplace enjoyable makes work sustainable.

## Purpose and scope

At **LISAM**, we adhere to a set of basic principles and standards that guide our ethical behaviour in all interactions with shareholders, customers, suppliers and authorities, in which members of the community and any individual interact with us.

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<sup>1</sup> For ease of reference, all companies of Lisam Connect and Lisam EH&S are listed under the **LISAM** name (see the list below).



These principles define the ethical responsibilities of our directors, employees, externs, government officials and occasional collaborators (such as temporary workers, students, interns and trainees) with respect to human rights, fundamental freedoms, health, safety and the environment.

These principles apply to all **LISAM** associates, regardless of their position, location or workplace. The purpose of this Code is not to list or explain all the laws and regulations in which **LISAM** operates. In fact, there are many situations that are not governed by external rules or standards. For this reason, we have drawn up a Code of Conduct (CoC) to guide our associates, setting out the expected behaviour for the various scenarios they may encounter.

The scope of this Code of Conduct (CoC) includes the Lisam Connect and Lisam EH&S Software companies:

- ➔ Lisam Connect:
  - Hemmis
  - Dinec International
  - Dinec Assembly by HTS
  - Megabyte Infrastructure
  - Megabyte Applications
  - Megabyte Consulting
- ➔ Lisam EH&S:
  - Lisam Systems and its subsidiaries
  - Lisam.Cloud
  - MPTS
  - Ecomundo
- ➔ WikiChemia

N.B.: All the examples cited in this Code of Conduct are hypothetical examples and not cases already encountered in the past.

## Respect of human rights

Respect for human rights means that a company must take care not to violate human rights ("do no harm") and consider the negative impact on human rights that it is involved in. To cultivate respect for human rights within **LISAM**, we implement comprehensive policies and initiatives aimed at upholding the dignity, equality and freedoms of every individual.



## Human rights and decent work

At **LISAM** we maintain a culture of loyalty, respect, diligence and honesty in our dealings with associates, customers and all stakeholders. This includes an unwavering commitment to respecting the dignity, freedom and privacy of individuals. Throughout the company and its subsidiaries, we are committed to fostering and maintaining a work environment that harnesses the full potential of our diverse workforce.

**Practical example:** I am concerned about evidence that some of my colleagues are working long hours without any adequate time to rest. What should I do?

- ➔ This is a difficult and sensitive situation that is generally unacceptable on company premises and could be a sign of modern slavery. If you are concerned, you should make a report to the Human Resources Department and/or the CSR Committee.

## Fundamental principles and rights at work

**LISAM** and its subsidiaries comply not only with the laws of the countries in which we operate, but also with the principles of the UN Global Compact (UNGC) and the International Labour Organization (ILO) to eliminate all forms of forced and compulsory labour. We unequivocally oppose forced or involuntary labour and actively work towards the elimination of child labour, ensuring compliance with the legal age of employment, which is 15 years. We prioritise the welfare, dignity and rights of our associates as well as value, respect and protect their interests.

Here are some indicators of forced labour:

- Extreme working conditions (excessive hours, unsafe working environment, or insecure premises);
- Unfair or non-existent wages;
- Confiscation of identification documents;
- Threats or intimidation to leave the workplace;
- Lack of freedom;
- Lack of contracts or abusive contracts.

In cases of child labour, all associates are required to provide the Human Resources Department with proper identification to prevent the recruitment of children under the age of 15.

We are committed to transparency and accountability in cases where external pressures affect our ability to carry out our responsibilities objectively. We will promptly report to Human Resources or the CSR Committee any instances where third parties use their position, authority or influence to compromise ethical standards.



**Practical example:** In the country where one of our suppliers/partners is based, it is legal to employ someone who is 12 years old. I recently learned that this supplier employs a number of 12-year-olds. Is this acceptable to **LISAM**?

- ➔ No. At **LISAM**, our partners strictly adhere to the minimum legal working age and never employ anyone under the age of 15 in any country. We take great care in selecting our suppliers and service providers and may refuse to work with or terminate our relationship with any supplier or service provider found to be in violation of child labour laws.

## Inclusion and diversity

At **LISAM**, we actively promote inclusivity and reject all forms of discrimination. This commitment includes refraining from any action that involves unfair differentiation, exclusion, limitation or bias that lacks objectivity, rationality or proportionality. We strongly oppose any conduct that seeks to impede, restrict, diminish or negate the recognition and exercise of human rights and freedoms, regardless of factors such as origin, race, marital status, age, opinions, gender, beliefs, trade union membership, ethnicity, socio-economic status, pregnancy, gender identity, sexual orientation, health status, disability or nationality which **LISAM** takes reasonable accommodation requirements. We believe that diversity among our associates adds value in an environment of equal rights and responsibilities.

We also unequivocally reject and prohibit any form of verbal, visual or physical conduct that undermines dignity and respect, as well as any manifestation of harassment, violence, bullying or other threatening behaviour. Such behaviour is strictly prohibited and will result in disciplinary action.

**Practical example:** The manager of our department loses his temper and insults, shouts, or belittles his colleagues. I don't know whether to report this.

- ➔ Yes, you should bring this concern to the attention of the Human Resources Department and/or the CSR Committee. We all have a responsibility to act professionally and to treat each other with dignity and respect.

## Moral harassment, sexual harassment and violence

**'Workplace violence'** refers to any situation in which associates or others are stalked, threatened, or physically assaulted in the course of their work.

**'Moral harassment'** in the workplace means a series of several abusive behaviours, whether external or internal, which occur over a period of time and which have the effect of undermining the personality, dignity or physical or mental integrity of an associate. This may occur when an intimidating, hostile, degrading, humiliating or offensive environment is created and is manifested in words, threats, actions, gestures or one-sided writings.



**‘Sexual harassment’** means any act or behaviour which is intended to show contempt for a person on the grounds of his or her sex or which, for the same reason, regards a person as inferior or as essentially reduced to his or her sexual dimension and which results in a serious attack on his or her dignity.

Examples of conduct that may constitute harassment include, but are not limited to:

- Offensive jokes, slurs, epithets, or name-calling;
- Physical assaults or threats;
- Intimidation or mockery;
- Insults or put-downs;
- Offensive objects or pictures;
- Interference with work performance;
- Unwelcome touching or contact;
- Offensive comments about appearance, clothing, or body part;
- Inappropriate sexual gestures, comments, or advances.

**LISAM** associates who are suffering psychological damage, which may also be accompanied by physical damage, arising from psychosocial risks at work, in particular violence, moral harassment, or sexual harassment at work, may first address the hierarchy. They are directly responsible for formulating a solution to the problem.

**Practical example:** I feel very uncomfortable because the head of my department keeps asking me out to dinner. I am afraid to tell him to stop because I think it might backfire.

- ➔ Such behaviour is inappropriate and you should report the situation immediately to Human Resources Department and/or the CSR Committee.

## Safety and health at work

At **LISAM**, the creation and maintenance of occupational health and safety (OH&S) practices is a priority for our associates. We firmly believe that the well-being of our associates in these areas is as important as any other business function or objective. We strictly prohibit any behaviour that compromises the safety or well-being of our associates, customers, suppliers or other visitors. This includes:

- Ensuring a safe working environment;
- Maintaining safe equipment and work systems by preventing health risks;
- Providing necessary information to ensure the well-being of associates;
- Implementing safe procedures;
- Ensuring that all workplace materials do not pose a health or safety risk;
- Comply with relevant legislation and other subscribed requirements.



**Practical example:** An associate was recently involved in an accident at work. It wasn't very serious, so some of our colleagues encouraged him not to report it so as not to affect our zero accident targets. Is that OK?

- ➔ No, all work-related accidents must be reported immediately to management so that proper medical attention can be provided and steps can be taken to ensure that all appropriate safety measures are in place.

## Respect of our resources

At **LISAM** we recognise that our associates around the world have access to materials, supplies, equipment and intellectual property owned by **LISAM** or our customers. We respect the ownership rights associated with all forms of property. We regard information as a valuable corporate asset and treat it with care, integrity and in accordance with the relevant laws of each country in which we operate.

### Use of assets

All associates are required to be responsible stewards of company assets, which include tangible and intangible resources belonging to the company, its subsidiaries, customers and other stakeholders, and are governed by work rules in each country in which we operate. Tangible assets include money, facilities, office supplies and equipment, while intangible assets include the company's brand, goodwill, trademarks, copyrights, patents and other intellectual property.

Associates of **LISAM** are expected to use these assets efficiently to contribute to the achievement of the company's objectives. It is imperative that resources are used responsibly and with the sole intention of benefiting the Company. While facilities, materials, supplies and equipment such as computers are provided for business purposes on behalf of **LISAM**, occasional minimal use for personal activities is permitted. However, personal use must not interfere with the efficient conduct of **LISAM**'s business.

**Practical example:** A visitor to a **LISAM** site is stuck at a door to which I have access. What should I do?

- ➔ You should not give the visitor access without identifying and meeting him. In the case of a building assigned to **LISAM**, visitors must complete an entrance form.



## Information technology security

**LISAM** recognises the collective responsibility to protect and maintain the security of information managed through technological resources and is managed through the ISO 27001:2013<sup>2</sup> certification. With this certification, **LISAM** implements a comprehensive Information Security Management System (ISMS) to protect sensitive information and ensure the confidentiality, integrity and availability of data.

It implements the protection of access to accounts and passwords assigned to these resources, understanding the crucial importance of their responsible management.

**Practical example:** During my teleworking days, I sometimes check sensitive emails in public places such as airports or train stations. Is it OK for me to work in public if others can see what I am working on?

- ➔ It is permissible for you to work in public spaces as long as you: take steps to keep the information private from public viewing, this is done on a temporary basis, and you must be connecting to a private WIFI (it's necessary to have a password). If it's not the case, it's considered a non-secure connection, and it's prohibited.

## Information management

**LISAM** associates are prohibited from disclosing confidential company information. Only designated official spokespersons are authorised to release such information to the media. It's important to note that trading on inside information or using such information for personal financial gain is illegal in many countries. In addition, associates are required to report any instances of disclosure of confidential information in accordance with company policy.

**Practical example:** I receive a market study for a benchmark and am asked to provide information about the company. Is it okay to share commercially sensitive information?

- ➔ No. Sensitive information about **LISAM** is confidential.

## Intellectual property

**LISAM** associates are committed to protecting all forms of confidential information, including trade secrets, processes, methods, strategies, plans, projects, technical or market data, and any other sensitive data.

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<sup>2</sup> ISO 27001:2013 specifies the requirements for establishing, implementing, maintaining, and continually improving an information security management system within the context of the organization. ISO 27001:2013 is only applicable to the offices in Nivelles, Écaussinnes, Zwevegem and LISAM Cloud.



We maintain the confidentiality of such information even beyond the end of our working relationship and extend this commitment to confidential information from previous collaborations with other companies.

In the event of any observed misuse of information, counterfeiting products, or infringement of intellectual property rights, associates are encouraged to report such incidents in accordance with the applicable policy.

**Practical examples:** During a Teams call with a client, my colleague records the call on his phone to get all the details and avoid having to take handwritten notes. We did not inform anyone on the call that it was being recorded. Is this OK?

- ➔ No. Recording of calls or meetings is not allowed and is a breach of privacy. However, recording is possible if necessary and with the consent of the people involved.

## Personal data

**LISAM's** associates handle the collection and processing of personal data with responsibility, ethical consideration, and in strict compliance with the laws in force in each country in which the company operates. Personal data is collected for specific, legitimate purposes and is not processed in a way that is incompatible with these purposes. We ensure that data is used only for the purposes for which it was collected, unless consent is obtained or there is a legal obligation to do otherwise.

In addition, associates are required to report any instances of disclosure of confidential information in accordance with the Personal Data Protection Act. Reports can be made to: [data\\_breaches@lisam.com](mailto:data_breaches@lisam.com)

We ensure compliance with all relevant data protection laws and regulations in each country in which we operate. This includes laws such as the General Data Protection Regulation (GDPR) in the European Union.

**Practical example:** I want to transfer information, including an associate's personal data, to a USB key so that I can work from home. What other steps should I take before transferring this data?

- ➔ Transferring associates or other company data to removable media such as USB keys is particularly risky and should not be done, even in exceptional circumstances.

## Artificial intelligence

AI has enormous potential to improve our efficiency, automate tedious tasks and even extract valuable insights from vast amounts of data. However, it is important to recognise the potential dangers that can arise from irresponsible or unsafe use of this technology.

Firstly, AI can be prone to bias and error. This can lead to poor decisions with potentially (serious) consequences for the people involved.





Furthermore, in the context of our business, where we may be dealing with sensitive and confidential data, it is all the more important to take appropriate precautions when using AI. This includes the need to anonymise data before subjecting it to machine learning algorithms or other AI applications. By anonymising data, we reduce the risk of inadvertent disclosure of personal or confidential information, while maintaining the integrity and confidentiality of the data we process.

All associates have a collective responsibility to ensure that our use of AI is guided by ethical and privacy principles. This means not only taking steps to minimise the risks associated with this technology, but also committing to being transparent and accountable in our data handling practices.

**Practical example:** I would like to optimise source code via ChatGPT. Is it okay?

- ➔ It is forbidden to put **LISAM**'s source code on any artificial intelligence tool, as this could compromise the company's security and intellectual property. Sensitive data and proprietary algorithms may be exploited by malicious parties or competitors.

## Respect of our planet

**LISAM** comprehensively addresses and manages the environmental risks associated with energy consumption, circular economy and environmental services at all its sites. Our approach involves setting ambitious targets to protect human health and the environment now and in the future. By integrating sustainability into our daily decisions and operating practices, we are collectively contributing to positive change. Furthermore, reducing greenhouse gas emissions not only meets our environmental objectives, but also provides opportunities to develop new markets and increase the value of our investments.

On the other hand, extreme climate events are likely to change the environment in which our businesses operate. By setting these targets, we are actively participating in the fight against climate change, the greatest challenge of this century. You can find those targets in the environmental policy.

All associates of the organisation must adhere to these priorities:

- Promote an environmental culture to reduce energy, water and waste through simple everyday actions (such as turning off lights when leaving the office, keeping the temperature of buildings at 20°C, etc.);
- Raising environmental awareness by introducing waste management measures;
- Improve the identification and analysis of environmental risks within the Group.



# Respect of our relationship with parties

## Client and competitor

**LISAM** associates serve clients with integrity, ensuring fair and honest treatment in every transaction. We uphold principles and values that prioritise the provision of services of the highest quality and timeliness, as set out in the ISO 9001:2015<sup>3</sup> certification, which includes the establishment of a Quality Management System (QMS) to enhance customer satisfaction, improve processes and ensure continuous improvement.

Our aim is to fully understand our customers' needs and continually innovate our processes to meet and exceed their expectations. It is strictly forbidden for associates to make false comparisons with equivalent services provided by competitors.

**Practical example:** While preparing **LISAM**'s reply to a customer, another company suggests that it will submit an inflated offer to ensure that **LISAM** wins this campaign and asks for the same in return in the future. Is this a win-win situation?

- ➔ Not at all! Such behaviour violates competition law and can expose the company to significant legal liability.

## Fair and equitable choice of supplier

**LISAM** guarantees that all service providers are treated fairly and equally during the processing of project bids. The selection process prioritises impartiality through fair competition and objective evaluation, including: financial equality, equal treatment, transparency of the process, promotion of sustainable and balanced relationships and prevention of corruption.

Therefore, any associate involved in the selection process must refrain from putting personal interests first. This obligation to act in good faith during the pre-contractual phase is now mandated by legal and regulatory standards.

**Practical example:** I received a gift from a supplier during negotiations.

- ➔ All gifts and invitations must be automatically refused. In absolute terms, this means that you must not accept any benefits.

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<sup>3</sup> ISO 9001:2015 is only applicable to the offices in Nivelles, Écaussinnes, Zwevegem and LISAM Cloud.



# Culture of lawfulness

## Regulatory compliance

**LISAM** complies with the laws, regulations and codes of conduct in each country in which it operates, as well as with this Code of Conduct (CoC) and the company's established policies, rules and procedures.

## Anti-corruption

**'Corruption'** means the solicitation of a bribe by asking or inducing another person to give a bribe, and escalates to extortion when accompanied by threats to personal integrity, life or the private actors involved (Principle 10 of the UN Global Compact).

**LISAM** strictly complies with anti-corruption laws in all countries where it operates. We do not engage in or authorise corrupt practices, nor do we encourage others to do so.

**Practical example:** I need to travel on business to a country that requires a visa. At the embassy, the officer tells me that the visa process is taking much longer than expected. He suggests that he can speed up the process if I pay him the sum of €1,000.

- ➔ We do not tolerate any form of corruption. Politely decline the offer and report the situation directly to your manager.

## Anti-bribery

**'Bribery'** is the offer or receipt of a gift, loan, fee, reward or other advantage to or from a person as an inducement to engage in dishonest, illegal or breach of trust activity in the conduct of business (UN Global Compact Principle 10).

**LISAM** strictly prohibits bribery, illegal kickbacks, secret payments or any other form of improper remuneration. Associates, suppliers, and partners are prohibited from offering, paying, soliciting, or accepting bribes in any form. However, associates may exchange modest gifts with customers or suppliers or make charitable contributions within reasonable limits. As a global company, **LISAM** complies with anti-bribery and corruption laws and regulations in all regions in which it operates.

**Practical example:** I recommended a local "IT consultant" to help us. This consultant asked for a large retainer and said that the money would be used to "help speed things up". Since we don't know exactly where this money is going, is this arrangement allowed?

- ➔ No, this type of payment is a disguised bribe and is not permitted.



## Anti-money laundering

**LISAM** strictly complies with relevant anti-money laundering legislation and strictly prohibits any donations or contributions to political parties, candidates or organisations that act as intermediaries for political contributions on behalf of **LISAM**.

Associates are prohibited from using the **LISAM** brand, resources, assets or equipment to engage in political activities, including demonstrations or election campaigns. They must also remain vigilant to avoid situations where their personal political contributions or activities could create the perception of a conflict of interest.

**Practical example:** I am considering working with a supplier based and providing services in France who wants to be paid into a bank account in the Cayman Islands. Can I work with this supplier?

- ➔ Bank accounts based in jurisdictions other than where a supplier is headquartered or provides services raise red flags, particularly if the bank account is located in a jurisdiction that is known to be a tax haven.

## Political contributions

At **LISAM**, individuals involved in political activities in any jurisdiction must ensure that their involvement is clearly defined as personal and not representative of the company. Associates must comply with the requirements of the local laws governing political contributions in the countries in which they operate.

**Practical example:** A high-profile political candidate asks the company to make a substantial financial contribution to his or her campaign. The candidate argues that such support would be consistent with the company's values and would help promote policies that are favourable to the company.

- ➔ It is considered bribery. Engaging in bribery or any form of corruption is contrary to the company's values and policies. It is also against local and international law, which could have serious legal and reputational consequences for **LISAM**.

## Family and others

**LISAM** prohibits any direct or indirect involvement or influence in the solicitation, negotiation or decision-making process of any customer, supplier or business partner with whom there is a family or personal relationship that could create a conflict of interest or personal benefit. This includes relationships involving family members as partners, investors, agents or in any other capacity.



Associates who are responsible for monitoring, supervising, auditing or controlling areas overseen by family members must promptly disclose the situation to a manager or the Board of Directors. In addition, associates must refrain from intervening or fulfilling requests from superiors, subordinates, colleagues, family members, or friends if doing so could compromise the integrity of business operations.

**Practical example:** I have a brother who is a service provider for a training organisation, and his offers to the company are competitive and meet our needs. What should I do?

➔ To avoid any conflict of interest, you can't accept this kind of arrangement.

## Gifts

A '**conflict of interest**' occurs when an associate engages in a professional activity in a situation that may influence the way he or she performs his or her duties, thereby calling into question the impartiality and independence of decision-making.

**LISAM** must avoid any situation that may give rise to actual or potential conflicts of interest by promoting transparent decision-making throughout the company in relation to third parties and clients. Some of the most common situations that may give rise to a conflict of interest are:

- Professional or business-related conflict:

An associate must not participate in or attempt to influence any decision or business transaction with any current or potential competitor, customer, partner, vendor, supplier or other business entity in which there is a direct or indirect financial interest.

- Conflict related to personal relationships:

An associate should not participate in, or attempt to influence, any decision or business transaction that could benefit, or appear to benefit, a relative, a close personal friend, or a business in which a relative or close personal friend has a direct or indirect financial interest.

An associate should not accept anything that is designed to obtain or retain preferential treatment, business advantage or favour. Accepting or offering such gifts could be considered bribery or corruption.

All gifts offered, received or declined must be recorded in the Gift Register. It is important to report all offers of gifts as soon as they are received.

**Practical example:** I received an iPad as a gift from a supplier, and they had it personalised with my initials. Can I keep it?

➔ No. Politely return the item to the supplier and explain the company's policy.



## Alcohol and drugs

**LISAM** wishes to promote the safety, health, and well-being of all its associates. In fact, associates with alcohol and drug problems are more likely to be absent, have an increased risk of accidents at work and their performance is generally lower than that of the average associate. The aim of **LISAM** is to prevent functional problems caused by problematic alcohol and drug use and to respond appropriately when this problem occurs.

**LISAM** identifies the types of alcohol that are likely to be consumed at work:

- It is forbidden to be under the influence of alcohol or other drugs when starting work or during work.
- It is forbidden to consume alcohol, to make them available to others or to dispose of them beyond the limits established by the working rules in force in each subsidiary (possible exceptions for alcohol are gifts on the occasion of birthdays, events, departures, etc.).
- Contracts with third parties or sub-contractors will stipulate that it is forbidden to consume alcohol/drugs on the **LISAM** site, or to supply or make them available, under penalty of possible termination of the contract in the event of non-compliance.

Absolute zero tolerance is always required for all drugs. If an associate finds a colleague under the influence of alcohol or drugs, the associate must contact the line manager who will, for safety reasons, remove the associate from the workplace and ensure the associate's safe return home. A meeting should be arranged after the incident and a written report of the incident will be prepared. If the incident is repeated, associates should follow the procedure for frequent use of alcohol and drugs:

- The supervisor notices a malfunction on the part of the associate;
- The associate is confronted with operational problems in production that are factual, concrete and objective;
- The associate must contact the person of trust/advisor for external prevention of psychosocial problems and the company doctor (if there is one);
- A support plan for psychological problems is drawn up in consultation with the supervisor;
- A contractual obligation to support these measures.
- If the agreements made are not respected or the situation does not improve, a penalty may be considered.



# Our responsibilities

## Board of directors

**LISAM** is responsible for approving the content and revisions of the Code of Conduct (CoC) and policies, and overseeing their distribution. In collaboration with the General Management, **LISAM** ensures that the Code of Conduct (CoC) and policies are effectively disseminated throughout the organisation.

## Directors

**LISAM**'s associates are familiar with the Code of Conduct (CoC) and the policies and annually sign a commitment letter each year in which they confirm their commitment to comply with its provisions and updates. If any aspect of the Code of Conduct (CoC) or policies is perceived as unclear or difficult to apply, associates are encouraged to notify the Human Resources Department ([hr@lisam.com](mailto:hr@lisam.com)) and/or the CSR Committee to facilitate clarification and resolution.

## CSR Committee

**LISAM** ensures that all departments comply with the Code of Conduct (CoC) and policies by facilitating their dissemination, promoting their understanding and encouraging their consistent application through the CSR Committee (Corporate Social Responsibility). We provide guidance and support for the handling of reports relating to the Code of Conduct (CoC) and policies, and promptly address any doubts or concerns regarding potential violations.

We also monitor the confidentiality and impartiality of investigations into reported incidents and facilitate discussions to determine appropriate corrective action for acts or omissions that violate the CoC and policies.

## Associates

**LISAM** associates are entrusted with the responsibility of reporting any integrity concerns, potential violations of the Code of Conduct (CoC) and policies, or instances of unethical, illegal or improper behaviour. Reports should be made to Human Resources, the line manager and/or the CSR Committee.

In addition, associates are required to sign a Commitment Letter, in accordance with the company's specified frequency, affirming their commitment to adhere to the Code of Conduct (CoC) and policies.



## Human resources

**LISAM** Human Resource Department ensures the widespread distribution of the Code of Conduct (CoC) and policies among associates by providing copies and collecting signed acknowledgments of receipt. In addition, the issues outlined in the Code of Conduct (CoC) and policies are included in the induction and training programmes for new associates.

## Marketing

**LISAM** is committed to conducting business in a legal, ethical, honest and truthful manner, in accordance with the principles of fair competition, good business practices and social responsibility.

Associates are required to avoid unethical situations that compromise integrity and human dignity or involve culturally offensive symbols. They must also refrain from using elements that could potentially lead to misinterpretation of the characteristics of the services offered.

## Internal audit

**LISAM** monitors compliance with the guidelines set out in the Code of Conduct (CoC) and the policies and immediately informs the Board of Directors of any breaches detected. We closely monitor the actions taken by management to address reported violations.

## Ethical compliance system

**LISAM** maintains the confidentiality of all reports received from associates and other parties, unless disclosure is required by applicable law, in which case only the information necessary for the investigation will be disclosed. We do not tolerate unsubstantiated reports made in bad faith against innocent individuals.

To determine whether an individual has violated the Code of Conduct (CoC) and policies, we conduct impartial and thorough investigations, ensuring that any alleged misconduct is supported by evidence.

**LISAM** prohibits any form of retaliation against individuals who report violations or who cooperate in good faith with investigations of suspected violations of the Code of Conduct (CoC) and policies. Failure to report known violations of the Code of Conduct (CoC) and policies may result in shared responsibility and require corrective action.





## Government and authorities

**LISAM** is committed to full compliance with the laws, regulations and relevant guidelines issued by the governments of all countries in which we operate. We maintain open communication and cooperation with the relevant authorities at all times. Associates will show respect to government agencies and officials, treat them courteously and foster an environment of openness and trust conducive to constructive discussions and agreements.

Associates are expected to respond promptly to and comply with all requests or observations from governments and authorities, and to cooperate effectively and courteously within the limits of laws and regulations. All interactions between **LISAM** and government agencies or officials will strictly comply with applicable laws and the principles outlined in this Code of Conduct (CoC) and related policies.

## Reporting for associates

If you find yourself in a situation where you perceive a conflict between the language of the policy and the laws, customs, or practices of your workplace, or if you have any questions about this Code or wish to report a possible breach of it, you are encouraged to raise your questions and concerns through established channels. These channels prioritise confidentiality to the fullest extent possible. Whether you have an inquiry or wish to report a potential violation, you can contact the CSR Committee or via the email address [ESG@lisam.com](mailto:ESG@lisam.com).

**LISAM** is committed to thoroughly investigating, addressing and responding to associates' concerns and to taking appropriate corrective action in the event of policy violations.

## Sanctions or penalties

Failing to comply with this present Code of Conduct (CoC) may result in severe penalties for the individual and for **LISAM**, which may cause insecurity, financial loss and damage to its image or reputation.

A violation may result in:

- Disciplinary, civil and criminal sanctions against any associate involved in such behaviour.
- Termination of a business relationship with a partner who does not accept or comply with this present Code of Conduct (CoC).



## Revision

The practical application and effectiveness of this present Code of Conduct (CoC) will be evaluated each year following its adoption. In the light of this evaluation, this policy may be revised as appropriate.

## Acknowledgment

I declare that I have read and understood **LISAM**'s Code of Conduct (CoC). I agree to fully comply with this policy and the related guidelines in all my activities related to **LISAM**.

Date: \_\_\_\_\_

Place: \_\_\_\_\_

Signature:



**CEO:**

Michel Hemberg

CEO

**CSR Committee:**

Thierry Levintoff

CFO / CSR Committee Chairman

Pauline Cinarelli

Certification officer / CSR  
Committee Vice chair

Océane Denis

Certification officer / CSR  
Committee Vice chair



