NUMERYX

CSR – ETHICS
ACTIVITY REPORT NUMERYX

NUMERYX GROUP

NUMERYX

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OUR COMMITMENTS

Since its creation, NUMERYX has been committed, alongside its partners, to defending the major principles of ethics and the fight against corruption. NUMERYX therefore proposes more ambitious actions in this area each year.

2023 was the pivotal year, marking NUMERYX's ambition to work operationally on a genuine strategy for defending business ethics and fighting corruption.

To this end, the company has committed to its various partners and customers to uphold its commitments and actions in favor of ethics.

SIGNATORY OF THE UNITED NATIONS GLOBAL COMPACT

Since the beginning of 2024, NUMERYX has been defining actions to defend the Compact's 10 major principles on human rights, labor, the environment and the fight against corruption. This membership makes it possible to act against corruption in all its forms, including extortion and bribery.

2024: Joined the United Nations Global Compact

December 2023: awarded the EcoVadis bronze medal

End of 2023: NUMERYX Technologies obtained the bronze medal with a score of 52/100 from its very first year of participation, demonstrating a particular determination to quickly implement its energy transition

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The promise of the NUMERYX group

The NUMERYX group complies with international labor standards, in particular those relating to the protection of workers and the prohibition of forced labor and child labor, in order to guarantee working conditions in which fundamental human rights are necessarily respected. The NUMERYX group therefore prohibits all forced or undeclared work across all of its subsidiaries. It is also committed to improving working conditions and preventing occupational risks, notably through specific training. The NUMERYX group respects the rights of its employees and protects individuals' privacy. In addition, active social dialogue is ensured with employee representative bodies, in respect of union independence and pluralism.

In practice, the NUMERYX group asks everyone to comply with:

- the internal regulations, their appendices and the rules of conduct,
- the Universal Declaration of Human Rights (available from the HR department),
- the local regulations in force in connection with their professional activities.

More broadly, employees are asked to do their best to work together in a pleasant environment, treating people with respect and courtesy. In their professional activity, they consistently show neutrality of opinion and respect everyone's differences and commitments.

This is reflected in steering indicators that are monitored on a monthly basis.

The indicators in question:

- Percentage of targeted suppliers having signed the supplier code of conduct
- Employee signatures / acknowledgment of receipt and understanding of the ethics policy
- Annual reminder of the ethics policy with an internal awareness campaign
- Number of reports of corruption or bribery made via the whistleblowing channel
- Number of reports of corruption or bribery reported to managers

For all of these indicators, NUMERYX has set itself the following objectives by 2030:

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100%
of targeted suppliers will have signed the supplier code of conduct

100%
of employees will be trained in the ethics policy

An annual ritual
will be set up to raise internal awareness of the ethics policy

0
reports of corruption or bribery made via the whistleblowing channel

0
reports of corruption or bribery reported to managers

Highlights of the year 2024

Key figures of the year

1 An update of the Ethics Charter and Sapin II compliance

35 Employees made aware of ethics-related risks

2 Ethics Committee meetings held

1 Presentation to the executive committee

0 Ethics incident reported

Key events

The year 2024 made it possible to complete the alignment of the ethics charter with the Sapin II law, and to continue prevention and dialogue within the NUMERYX teams

- End of the Sapin II compliance work: update of the Ethics Charter by strengthening and formalizing the anti-corruption section and by adding and grouping together examples of concrete cases
- Ethics awareness sessions within each department
- Specific ethics awareness for new hires and work-study students
- Increased assessments of suppliers and stakeholders present in partnership/sponsorship contracts (due diligence).

An online course on corruption risk is available to all employees and helps them better understand and prevent issues of conflict of interest, corruption, gifts and invitations. This tool was co-financed and co-developed with companies that had a comparable need.

In terms of ethics, the NUMERYX ethics framework consists of the following documents:

- Ethics Charter 23-06-2023
- NUMERYX Anti-corruption Policy 2024 v1
- Anti-corruption whistleblowing channel
- Corruption risk analysis 12-07-2024

The following highlights can also be noted:

- Annual review of ethical risk in the NUMERYX risk mapping
- Benchmarks with companies pursuing the same approach, such as Freelance.com and Inops
- 3 Ethics Committee meetings

DISSEMINATION AND MANAGERIAL SPONSORSHIP OF ETHICAL PRINCIPLES / OWNERSHIP OF ETHICS BY MANAGEMENT / ROLL-OUT OF POLICIES

Ethics discussed at the executive committee

At NUMERYX, ethics is the subject of an annual presentation to share with its representatives the latest developments in this area (action plan, incidents, regulatory compliance). The ethics approach is also presented to regional agencies, depending on current events and at least once a year, to present the annual review and planned actions.

Dissemination and promotion of the ethics charter

The NUMERYX Ethics Charter is given to new employees, who acknowledge receipt electronically.

Dissemination and promotion of NUMERYX's own ethics documents

The ethics page of the NUMERYX intranet recalls the main documents and provides useful contacts, in particular the members of the Ethics Committee, as well as the annual report and communication materials. The e-learning on corruption prevention is also available. In addition, every contract with service providers or suppliers includes an ethics clause from the Responsible Purchasing policy, which provides for acknowledgment of adherence to NUMERYX's commitments as set out in the Suppliers' Ethics Charter.

Compliance of the anti-corruption system with applicable legislation

NUMERYX ensures compliance with the obligations of Law No. 2016-1691 of December 9, 2016 on transparency, the fight against corruption and the modernization of economic life, known as Sapin II. Compliance completed in 2024:

- Anti-corruption charter OK
- Risk mapping updated
- Ethics charter updated OK
- Anti-corruption training system OK
- Internal control and evaluation system OK

IMPLEMENTATION OF THE ANTI-CORRUPTION POLICY

Ethics of the business relationship / gifts and invitations policy

The Ethics Charter on Relations with Suppliers is applied by NUMERYX's suppliers. The Suppliers' Code of Conduct is applied internally.

NUMERYX carries out internal controls concerning:

- compliance with ethical principles, in particular the policy on gifts and invitations,
- the distribution of the Ethics Charter to all employees by Management,
- compliance with the Code of Conduct for relations with suppliers.

These controls demonstrate the application of the Ethics Charter by each Department, including the traceability of gifts and invitations received or offered.

Prevention of conflicts of interest

The rules on preventing conflicts of interest are described in the Ethics Charter. Situations likely to pose a difficulty in this regard are identified by employees and then, if necessary, analyzed and handled by the ethics officer and the Ethics Committee (CSR steering committee).

Integration of ethics into management references

Ethics awareness: the ethics training organized in 2024 included:

- An awareness session for the CODIR and the CSR steering committee on the risk of sexual harassment and sexist remarks and behavior, led by an employee appointed to the CSE, who is the referent for sexual harassment and gender equality,
- Awareness sessions for the management teams (CODIR), carried out remotely from early March 2024. These sessions were cascaded within the departments;
- Awareness sessions for new hires and work-study students.

GOOD PRACTICES TO REPORT ON THE INTEGRATION OF ETHICS INTO MANAGERIAL REFERENCES

Involvement of General Management

The personal involvement of the CEO was demonstrated in particular in 2024 by:

- A CEO address on 10/16/24 on the importance of the program to promote ethical issues among employees,
- An address on the importance of complying with the ethical risk prevention program,
- The attention he devotes to following up investigations into incidents and suspected ethical incidents and, where applicable, corrective actions,
- His participation in the scoping and feedback meetings of ethics audits and in internal control meetings on compliance with the Ethics Charter,
- The importance of managerial exemplarity, emphasized on several occasions by the CEO and the HR Director.

Involvement of directors and managers

Directors and managers are increasingly involved in preventing ethical risks: listening to employees, vigilance toward weak signals, interventions in meetings, seminars, and training modules for management teams.

Appointment to positions of responsibility

When a line manager appoints someone to a position of responsibility, they make sure the person appointed has the skills, aptitude and means needed to fulfill their duties in full respect of the company's values and the Ethics Charter.

Ethical risk management

Analysis of ethical risks (fraud, corruption, harassment, etc.) Ethical risk, which is among NUMERYX's major risks, has been stable since its creation in 2023 in the risk mapping: the rising expectations of our stakeholders are "offset" by the prevention actions implemented. The residual risk scenario (reasonably pessimistic scenario) adopted is as follows:

- a repetition of ethical breaches within NUMERYX, or a major ethics case involving NUMERYX, which could call into question NUMERYX's image or even its legitimacy among stakeholders.

Corruption risk has been identified for employees in contact with suppliers and, more generally, any external stakeholder. The corruption risk matrix will be updated every year in cooperation

Confidentiality and anonymity of whistleblowing

The Ethics Committee ensures the protection of whistleblowers' anonymity and the confidentiality of the information received. The e-mail address ethique@numeryx.fr is intended to encourage the reporting of ethical dilemmas, questions, weak signals and alerts. It also guarantees the confidentiality of the sender.

Suppliers and subcontractors

In application of the "gifts and invitations" policy, the registers of gifts and invitations (received and offered) for year N are sent by our marketing department to the ethics referent. In addition to sales staff, support functions and consultants are made aware of the importance of ethical behavior in dealings with subcontractors through the distribution of the Supplier Relations Charter, Purchasing department documents and training on corruption risk. Suppliers are made aware of ethics through the Suppliers' Ethics Charter, which is referenced in the general terms of purchase and through the CSR clause to be signed before any contract.

Financing of political activities

NUMERYX has not financed any political activity since its creation in 2005 and prohibits itself from doing so.

Good practices to report

- NUMERYX complies with the legal obligations on sexist behavior, law no. 2018-703 of August 3, 2018 "strengthening the fight against sexual and sexist violence".

- Through its CSE, NUMERYX has a referent for combating sexual harassment. Awareness actions were carried out in person for the CODIR and the Ethics Committee.

- Respect for human rights is integrated into all of NUMERYX's approaches in accordance with the CSR Charter. In this context, NUMERYX has launched a stakeholder consultation and listening process. This process strengthens dialogue and in particular facilitates the delivery of activities relating to development or maintenance projects.

- Scrupulous compliance with the regulations in force, notably in France and Germany, ensures respect for human rights (labor code, labor inspectorate, GDPR). Apprentices receive particular follow-up from the managers concerned with the support of the HR department.

Compliance management

Reporting and handling of ethical incidents: Ethical dysfunctions, suspected dysfunctions and/or non-conformities are tracked by the ethics referent and handled by management. Ethical incidents are shared in the Ethics Committee while respecting anonymity. Ethical incidents are handled by the ethics referent in liaison with General Management, the HR department, management and the stakeholders of the Ethics Committee.

Crisis management system

The crisis management system is led by the Quality and Risk Manager in cooperation with General Management.

Confirmation of archiving of supporting documents for this report

NUMERYX has duly identified and archived the supporting documents for the information given in this report and in the table of indicators.

CONCLUSION

This ethics and anti-corruption activity report highlights the continuous efforts of NUMERYX Technologies to integrate the principles of societal responsibility into its practices, and demonstrates its desire to establish a climate of trust with its employees as well as with its customers and partners.

Through solid governance, structured around the ethics task force and decision-making bodies such as the COPIL and the CODIR, the company is strengthening its commitment to limiting and eradicating all forms of irresponsible behavior or behavior contrary to NUMERYX's values, as set out in its various charters (CSR, Ethics, Responsible Purchasing) and in the anti-corruption policy, by aligning its actions with its long-term strategic objectives.

This governance framework ensures effective and transparent decision-making, essential for achieving our ethical ambitions by 2030.

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