
CODE OF ETHICS

tessi



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Message from the Chairwoman

As a leader in Business Process Services and the digital transformation of companies, Tessi has been supporting companies and public services in optimising their business processes and customer experience for more than 50 years.

We operate in markets where it is essential to uphold the reputation, compliance and reliability of players. We must all protect and promote the culture and values of the Tessi Group, in particular transparency and honesty, in line with our CSR approach.

This Code of Ethics reflects our core values as a company. It embodies our commitment to integrity, transparency, social responsibility and compliance with laws and regulations in all areas in which we operate. It sets out the behaviours expected of each of us and provides clear guidelines for ethical business practices.

Our Code of Ethics is the result of careful consideration and close collaboration between our teams, our partners and our stakeholders; it should guide us in our daily decisions, whether in relation to our customers, our suppliers, our employees or our local communities.

Every action we take must be guided by our commitment to integrity, loyalty and mutual respect. We must be ethics ambassadors in our everyday work, ensuring that our decisions are in line with the values we stand for and the principles set out in this code.

I therefore encourage you all to read our Code of Ethics carefully and to put it into practice in your professional activities. We have also established communication channels to report any suspected breaches of this code, to ensure a safe and ethical environment for all.

The trust and reputation of our Group are based on the commitment of each of us to act with integrity and respect. By following the principles set out in this document, we will continue to build a strong and sustainable future for Tessi.

I would like to thank you for your commitment and involvement in preserving the Tessi Group's DNA, and thus ensuring its success, of which we can all be proud.

Claire FISTAROL
Chairwoman



Presentation of the Code of Ethics

6 Presentation of the Code of Ethics

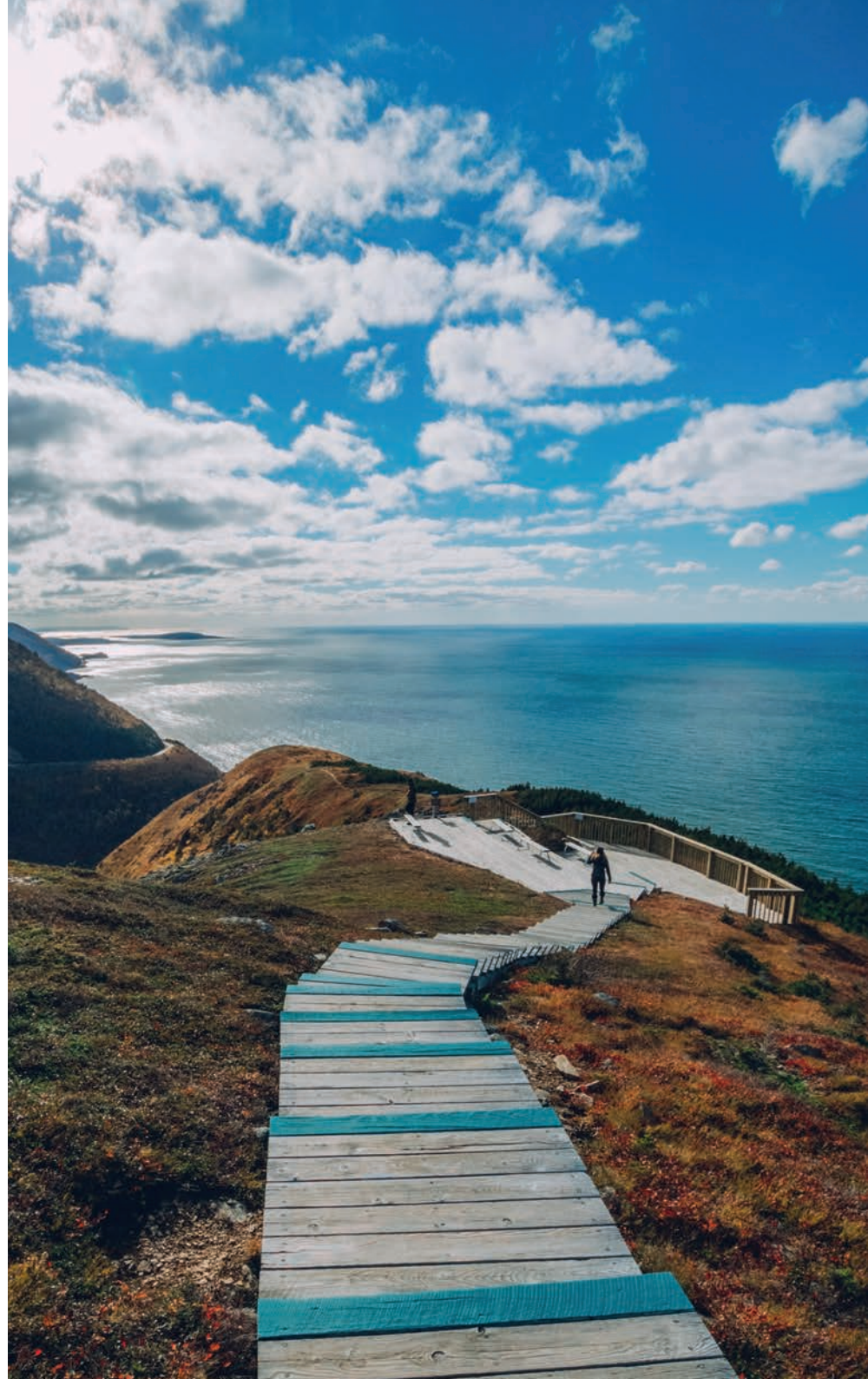
Tessi has built the trust of its customers and employees by prioritising local service, responsiveness, adaptability and integrity.

The Group has been a signatory of the United Nations Global Compact since 2011, and undertakes to comply with the laws and regulations in force in each country where Tessi operates, with particular reference to:

- the Universal Declaration of Human Rights;
- the United Nations Guiding Principles on Business and Human Rights;
- the fundamental conventions of the International Labour Organization (ILO);
- transnational regulations, in particular the General Data Protection Regulation (GDPR 23 May 2018, Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016); Law no. 2016-1691 of 9 December 2016 on transparency, the fight against corruption and the modernisation of economic life (Sapin II); and Law no. 2017-399 of 27 March on the duty of care.

This Code of Ethics is aimed at all employees of Tessi subsidiaries worldwide, and aims to help them make the right decisions, in all places and in all circumstances.

Regardless of their level of responsibility, all employees must be aware of this Code, understand it and undertake to comply with it.



If in doubt...



The purpose of this Code of Ethics is to set out and illustrate the different types of behaviour and best practices to be adopted in terms of ethics, compliance and CSR.

Nevertheless, it does not claim to provide an answer to all the ethics questions that may arise in the course of your duties.

Tessi therefore encourages all employees to use common sense and good judgement to deal with various situations, in accordance with Tessi's values and in compliance with the law.

If you are unsure of what to do or to report a breach (actual or suspected) of the rules of the Code of Ethics, you should, depending on the context:

- talk to your line manager (this is the preferred option whenever possible);
- talk to your Human Resources Manager;
- contact your employee representative if necessary;
- as a last resort, follow the 'Internal Whistleblowing' procedure¹, available from Human Resources, and on the platform <https://tessi.signalement.net>.

Tessi will not accept any form of retaliation against an employee who, in good faith², expresses concerns or assists in the investigation of suspected breaches of the Code of Ethics.

1 - SMC-PR-03-Procedure-Internal Whistleblowing System

2 - 'In good faith' means the submission of a concern without malicious intent and without seeking personal gain, by a person with a plausible reason to believe it is true

As a moral reference, if you are faced with a situation where you are unsure of the implications, ask yourself the following questions:

- *Am I being fair and honest: are my actions legal?*
- *Is it the 'right' thing to do: does the situation comply with Tessi's values and Code of Ethics?*
- *Looking back, does my behaviour seem acceptable: can I openly talk about my attitude to my friends, family, colleagues, superiors or subordinates?*

General rules of good conduct

WORKING CONDITIONS AND RESPECT FOR EMPLOYEE RIGHTS

► The Tessi Group's commitment

Tessi complies with international labour standards¹, in particular those relating to the protection of workers and the prohibition of forced labour and child labour, in order to guarantee working conditions in which respect for fundamental human rights is mandatory. Tessi therefore prohibits any forced or illegal labour in all of its subsidiaries.

The Group is also committed to improving working conditions and preventing occupational risks, in particular through the implementation of specific training.

Tessi complies with applicable laws and regulations relating to relations with employees, in particular the protection of privacy.

In addition, the company ensures active social dialogue with employee representative bodies, with respect for union independence and pluralism.

► In practice

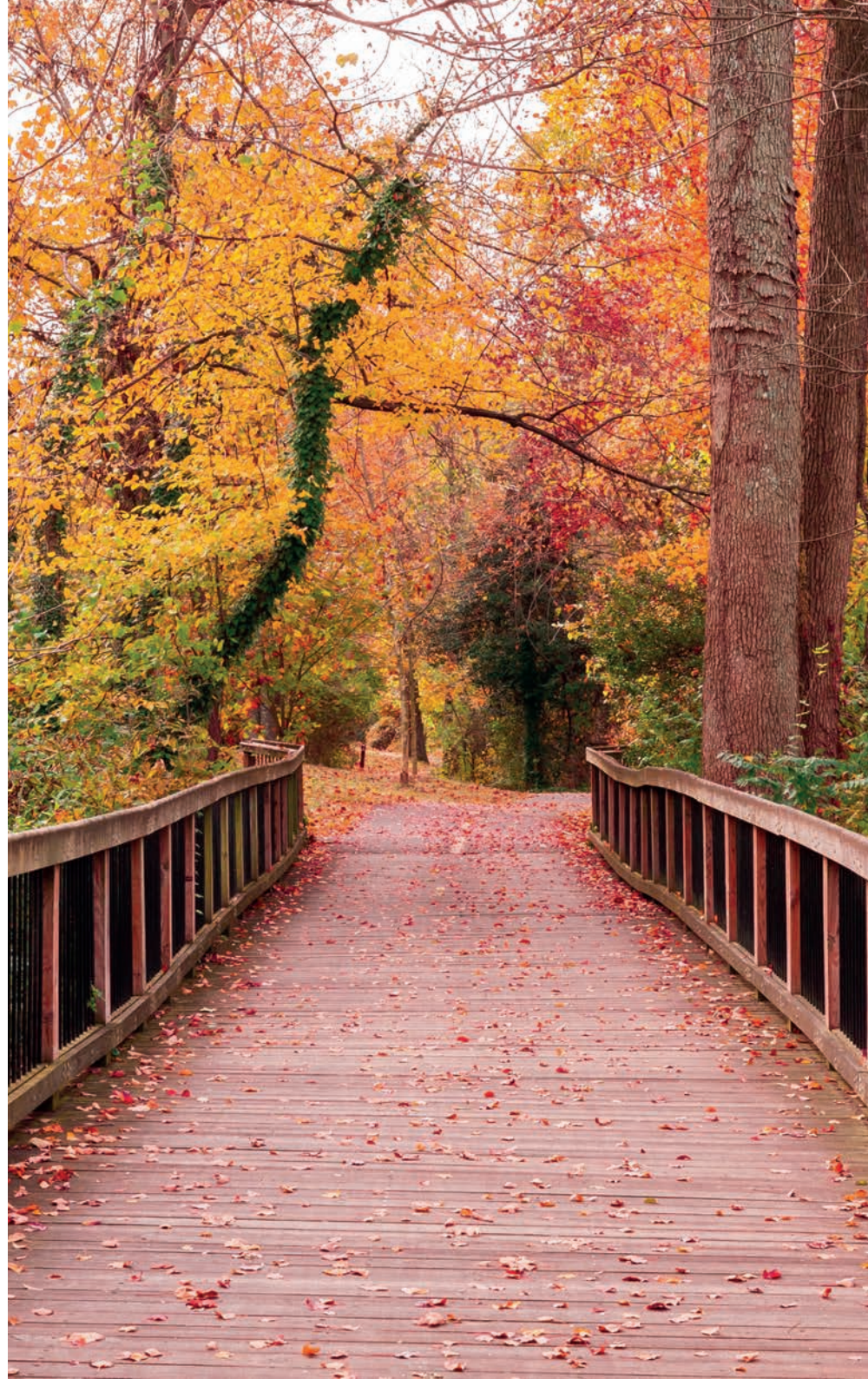
We ask everyone to comply with:

- the company's rules and regulations and their appendices;
- the Universal Declaration of Human Rights (available from your HR department);
- the local regulations in force in the course of their professional activities.

More generally, employees are asked to do their best to work together in a pleasant environment, treating people with respect and courtesy.

In the course of their professional activities, all employees must always demonstrate neutrality and respect each other's differences and commitments.

¹ - ILO Fundamental Conventions No. 29 (Forced Labour), No. 105 (Abolition of Forced Labour), No. 138 (Minimum Age) and No. 182 (Worst Forms of Child Labour)





RESPECT FOR HUMAN RIGHTS

► The Tessi Group's commitment

Each year, the Group draws up and publishes a vigilance plan: <https://www.tessi.eu/en/ethics-and-compliance/>.

This includes, in particular, reasonable measures to identify risks and prevent serious breaches of human rights and fundamental freedoms resulting from the Group's activities as well as those of its subsidiaries, subcontractors and suppliers with which it has an established business relationship.

► In practice

Stakeholders (managers, employees, suppliers, partners, etc.) are asked to familiarise themselves with and comply with the [Tessi vigilance plan – 2022](#), in particular with regard to human rights, in the course of their activities.

OCCUPATIONAL HEALTH AND SAFETY

► The Tessi Group's commitment

Tessi is committed to implementing the legal provisions relating to health and safety in the workplace. Tessi also has an active prevention policy in terms of occupational health and safety and ensures its consistent application.

Tessi asks any subcontractors and suppliers to comply with the same commitments.

Tessi maintains a social dialogue on issues relating to occupational health and safety.

► In practice

All employees have a duty to:

- comply with and enforce health and safety instructions;
- keep their working environment in the best possible condition;
- work with respect for all.

FIGHT AGAINST DISCRIMINATION AND HARASSMENT

► The Tessi Group's commitment

Tessi's policy is not to discriminate, for any reason whatsoever, in recruitment or labour relations.

As such, Tessi does not disadvantage any person because of their gender, customs, sexual orientation, age, family status or pregnancy, genetic characteristics, actual or perceived ethnic origin, political opinions, trade union activities, religious beliefs, physical appearance, surname, or health or disability, unless deemed unfit for their role by the occupational physician.

In addition, no employee may be subjected to acts likely to constitute bullying and moral or sexual harassment. Tessi will take all measures to prevent such acts.

► In practice

The Tessi Group does not tolerate any form of discrimination or harassment in working relationships.

All employees have a duty to behave towards the people they work alongside with dignity and with total respect for their physical and moral integrity.





RESPECT FOR CUSTOMERS

► The Tessi Group's commitment

Customer satisfaction is a priority for Tessi.

To this end, Tessi strives to deliver outstanding quality of service, in compliance with the applicable regulations in force, and to improve its services, taking into account comments from its customers as well as structural and economic changes in their markets.

For Tessi, being a responsible business also means offering an innovative range of useful products and services, which are sustainable responses to the basic needs of its customers and partners.

► In practice

Employees must comply with the procedures applicable to their role, in particular to achieve customer satisfaction targets.

In their dealings with customers, employees must demonstrate good faith, and be fair and honest.

ENVIRONMENTAL PROTECTION

► The Tessi Group's commitment

For several years, the Tessi Group has followed a simple and effective environmental policy (<https://www.tessi.eu/wp-content/uploads/2023/10/politique-environnementale-tessi-2023-en.pdf>), based on taking into account the most significant environmental implications of its activities. It aims to prevent environmental risks and strengthen our contribution to the fight against climate change, in accordance with the regulations in force.

These commitments determine our environmental trajectory and our low-carbon action plan aligned with the global targets set by the Paris Agreement and the Science Based Target Initiative for 2025. These global targets commit companies to reducing their greenhouse gas emissions by at least 50% by 2030 and achieving 'Net Zero GHG emissions' by 2050.

This approach allows us to contribute to the UN Sustainable Development Goals (SDGs), in line with our decision to join the United Nations Global Compact in 2011.

Setting and managing the environmental policy is the responsibility of the Group CSR Department and covers all areas of the Group's activities, including its French and international subsidiaries.

► In practice

We are committed to:

- optimising and reducing our energy consumption (Group energy efficiency plan);
- contributing to the circular economy by optimising waste recycling and recovery (implementation of selective sorting on our sites);
- limiting travel and promoting the use of eco-mobility (business travel policy and mobility plans);
- taking into account and reducing the environmental impact of our digital solutions (environmentally friendly actions in the office, limiting printing, shutting down workstations, optimising the sending of emails, practices in line with our Responsible Digital programme).



CONFIDENTIALITY AND PERSONAL DATA PROTECTION

► The Tessi Group's commitment

Data protection and cybersecurity are priorities for the Tessi Group. As a major player in the digital transformation of companies, digital trust is a strategic focus for development in this fast-growing market.

In light of this, for its own activities as well as those carried out on behalf of its customers, the Tessi Group is committed to guaranteeing the availability, integrity, confidentiality and traceability of information, aiming for an optimal level of data protection and compliance with applicable laws and regulations.

With this in mind, Tessi has implemented a Group information systems security policy that applies to all its subsidiaries and carries out regular risk analysis and controls in this area.

More specifically, Tessi has put in place a general personal data protection policy that applies to all Group subsidiaries, and which ensures compliance with the obligations of the GDPR and local laws in this area. These protection measures are supplemented by ISO 27701 certification for subsidiaries hosting data. Tessi thus demonstrates its ongoing desire to remain a trusted operator in terms of secure hosting and processing of sensitive and/or personal data.

Lastly, Tessi also ensures that the intellectual property of others is respected and prohibits any unlawful reproduction.

► In practice

All employees are contractually bound by the duty of confidentiality. In addition, information belonging to Tessi or its customers may be sensitive, or even covered by professional secrecy.

All employees are therefore required not to disclose any confidential business information to which they have access to third parties or Tessi employees who are not authorised to access it.

Similarly, employees are prohibited from directly or indirectly using any inside information they may hold in the course of their duties for personal purposes.

All employees must comply with the IT Charter and all of the Tessi Group's policies and procedures, particularly those relating to information system security and personal data protection.

In accordance with the regulations, all employees have an individual right to access and rectify processed data relating to them. This data is available on request from the recipients of the information. All employees also have the right to object, for legitimate reasons, to the processing of personal data relating to them.





TRANSPARENCY OF INFORMATION

► The Tessi Group's commitment

Loyalty to its customers and suppliers is a guiding principle for Tessi, in order to build and maintain lasting relationships of trust.

Tessi's shareholders and partners, as well as public services, rely on the detail and accuracy of the information contained in our documents. In particular, Tessi accurately, transparently and comprehensively reports its transactions in its accounts.

► In practice

Employees must ensure that the information provided in the course of their duties is accurate, timely, complete, correct and understandable.

In particular, all employees undertake not to falsify any document or data in order to mislead readers or conceal illegal activity. The implementation of internal control is essential, in particular for the preparation of financial documents.

FAIR COMPETITION

► The Tessi Group's commitment

Tessi undertakes to act in strict compliance with the rules and laws relating to competition applicable in the countries where the Tessi Group operates.

► In practice

Entering into agreements or engaging in any conduct likely to restrict or impair free competition is prohibited.

Sharing or disclosing commercially sensitive information concerning competitors, customers or suppliers may also constitute a breach of competition rules and the duties of loyalty and confidentiality, to which all employees are subject.

CONFLICTS OF INTEREST

► The Tessi Group's commitment

All employees must avoid conflict between their direct or indirect personal interests and those of the Group.

Tessi makes every effort to prevent such situations from occurring, in particular by:

- regularly analysing the risk factors to which the company is exposed;
- raising employee awareness of this risk;
- applying control procedures;
- providing its employees and stakeholders with a tool¹ - where they can make any relevant internal whistleblowing reports; processing whistleblowing reports and advising the players concerned via an Ethics Committee.

► In practice

Employees must avoid any situation in which their personal interests, or those of their close friends and family, influence or appear to influence the impartial and objective performance of their duties. They have an obligation to immediately report any incidents in which they are involved or which they may have witnessed, in accordance with the internal whistleblowing procedure.

In addition, in accordance with their obligation of loyalty, employees are prohibited from competing with Tessi's activities.

¹ - Internal whistleblowing platform: <https://tessi.signalement.net>





FIGHT AGAINST CORRUPTION

► The Tessi Group's commitment

Tessi opposes all forms of corruption in its relations with commercial and institutional partners.

In order to effectively combat the risks of corruption, Tessi has implemented an anti-corruption programme that meets the obligations of the Sapin II law for all its subsidiaries.

In particular, the following measures are applied:

- a regularly updated corruption and influence peddling risk mapping;
- an awareness-raising programme for employees and people who are more specifically exposed;
- a Code of Ethics;
- a process for assessing third parties before entering into a business relationship;
- an internal whistleblowing process;
- an accounting control process;
- an appropriate disciplinary process where applicable.

Compliance with these systems is also subject to regular checks and audits.

► In practice

Employees of the Tessi Group are required to implement the Group's compliance policy and applicable procedures in this area.

All employees are required to receive training on this topic, through:

- mandatory e-learning training modules;
- awareness training for exposed persons, if relevant to the employee.

GIFTS AND ENTERTAINMENT POLICY

► The Tessi Group's commitment

Gifts and entertainment may constitute active or passive bribery. In this context, the Tessi Group has implemented a policy to be followed by all employees, which sets out the rules and limits on gifts and entertainment in business relationships.

► In practice

- Business meals, entertainment and gifts must comply with the rules set out by the Group in the 'gifts and entertainment' procedure referred to as 'SMC-PR-05-Gifts & Entertainment Procedure'.
- If necessary, gifts and entertainment must be declared on the relevant form. Links can be found in the procedure.

In general, any Group employee may accept a gift or entertainment, or offer a gift or entertainment, if the following conditions are met:

- they are not requested by the beneficiary;
- they are not intended to obtain a quid pro quo or an unfair advantage;
- they are not intended to influence a decision and are therefore not carried out at a strategic time (e.g. ongoing call for tenders, signing of agreements, granting of authorisations, obtaining contracts, etc.);
- they are occasional in accordance with the professional activity;
- they do not cause embarrassment if they are revealed publicly;
- they are carried out in a strictly professional context;
- the beneficiary must not exercise any decision-making power concerning a future or ongoing decision affecting Tessi's interests.





PURCHASING POLICY AND RELATIONS WITH SUPPLIERS

► The Tessi Group's commitment

Any use of a third party is subject to several conditions that must be met prior to entering into a relationship.

It is therefore necessary:

- to measure its level of compliance (GDPR, Sapin II, duty of care, CSR, etc.) and information security according to the Group's specifications;
- for the third party in question to demonstrate a sound financial position and that it has no convictions with regard to the regulations in force.

► In practice

All buyers must comply with the purchasing compliance procedure, referred to as 'SMC-PR-02-Purchasing compliance procedure', and apply the following rules:

- send the compliance questionnaire to the third parties in question;
- collect information from third parties;
- decide whether or not to enter into a relationship, depending on the level of compliance.

POLITICAL NEUTRALITY

► The Tessi Group's commitment

Tessi is not aligned with any political party and does not contribute to the funding thereof.

► In practice

Any employee participating in a political activity must do so outside of their working hours, without identifying themselves as employees of Tessi and without using the company's resources (telephone, email, letterhead, etc.). They must also refrain from exercising any influence on these matters with their colleagues, business contacts and partners.

PATRONAGE

► The Tessi Group's commitment

Patronage or any payment to organisations, whether charitable or otherwise, must comply with Tessi's policy and the strict limits of the regulations.

► In practice

Donations to private or public organisations may be authorised, if they are not prohibited by local laws or contrary to Tessi's policy. This type of contribution must be approved in advance by senior management.



Implementation of the Code of Ethics

1. IMPLEMENTATION OF THE CODE OF ETHICS IN BUSINESS LINES

All of the Group's business lines are responsible for implementing this Code of Ethics. They may supplement it, if necessary, according to the specific legal, practical or geographical nature of their activities. However, these additional provisions must not contravene the values and principles of action set out in this code. They must be approved by the Group's Ethics Committee. For maximum ownership of the Code of Ethics, as well as the compliance programmes and related policies, the Group's employees and managers have access to these documents at all times (<https://www.tessi.eu/en/ethics-and-compliance>).

Business lines may also make these documents available to employees and managers by any other means (onboarding procedure, company rules and regulations, etc.).

2. ETHICS COMMITTEE

An Ethics Committee has been set up. It meets to consider ethics-related issues. In particular, it helps set the rules of conduct or action plans that should guide the behaviour of managers and employees, including setting the Code of Ethics. This committee is also responsible for processing internal whistleblowing reports, the categories of which are specified in the procedure 'SMC-PR-03-Procedure-Internal Whistleblowing System'.

3. DISCUSS AND PREVENT: CREATING A CLIMATE OF DIALOGUE WITHIN THE GROUP IS OUR PRIORITY

Tessi is aware that day-to-day implementation of the Code of Ethics is sometimes not easy and may raise questions. The Group therefore wants everyone to be able to express their opinions and concerns regarding the Code of Ethics, in the knowledge that they will be listened to and supported by their line managers. If any employee or manager has any doubts or questions, they are asked to speak to their line manager, the Legal Department, the HR Department or the Compliance Department.

4. INTERNAL WHISTLEBLOWING: BEING RESPONSIBLE MEANS WHISTLEBLOWING

The Group encourages employees (including external or temporary) and managers to report any ethical issues to their direct or indirect line manager, the Legal Department, the HR Department or the Compliance Department.

Tessi has set up a whistleblowing system, governed by the procedure 'SMC-PR-03-Procedure-Internal Whistleblowing System'.

This system, on the one hand, enables it to comply with its various legal and regulatory obligations (Sapin II Law, duty of care, provisions of the Labour Code, local laws, etc.) and, on the other hand, provides it with an efficient tool for processing all types of internal whistleblowing reports.

► In practice

All internal employees and external or occasional partners (including subcontractors, suppliers or business partners) can make a report on the platform¹ <https://tessi.signalement.net>. This platform should not replace the usual internal communication channels through the reporting lines (the direct or indirect line manager) to the Human Resources Department or an employee representative. It is therefore of a subsidiary nature.

The internal whistleblowing system keeps the identity of both the whistleblower and the person accused of the breach confidential, both when collecting and processing or storing the report received. No discriminatory measure or disciplinary sanction may be taken against a whistleblower who issued a report in good faith and without direct financial compensation.

¹ - All reports made on this platform are handled in accordance with the provisions of the Wasserman Law Decree of 3 October 2022.

Monitoring, control and sanctions



MONITORING AND CONTROL

The proper application of these rules is monitored by:

- management, through the exercise of day-to-day supervision over the work of employees;
- ongoing and periodic controls;
- an internal whistleblowing system;
- regular updating of risk mapping in the relevant areas (in particular personal data protection, anti-corruption, duty of care, CSR, etc.).

SANCTIONS FOR BREACHES OF THIS CODE

All employees are required to comply with the rules set out in this code, as part of their job-related responsibilities.

The principles set out in this Code of Ethics are covered by legal and regulatory provisions or rules applicable within Tessi. In the event of non-compliance, the employee may be held personally liable.

Any act considered to be wrongdoing may, depending on its seriousness, be subject to a sanction as provided for in the company's rules and regulations.

Furthermore, all employees involved may, where applicable, be subject to legal action before the competent court.

In the event of non-compliance with the guidelines set out in this code, Tessi undertakes to:

- Take all declarations into account;
- Investigate reports with due care;
- Assess the facts objectively and impartially;
- Take appropriate and proportionate corrective measures and disciplinary sanctions.
- In the event of non-compliance with the rules of confidentiality and/or information security, it may be decided, upon knowledge of the facts, to immediately suspend access rights to the information systems of the employee concerned.

**Appendix applicable to employees
involved in the trusted remote identity
verification service**

ENHANCED REQUIREMENTS FOR THE REMOTE IDENTITY VERIFICATION SERVICE

► The Tessi Group's commitment

Tessi is tasked with providing a remote identity verification service in which all actions are carried out with loyalty, discretion and impartiality.

Tessi undertakes to comply in full with the Requirements Framework applicable to remote identity verification providers.

In this respect and in addition to the confidentiality commitment already described in the text of the Code of Ethics, Tessi undertakes not to disclose any information obtained or generated in the performance of its duties to a third party, even if anonymised and decontextualised, unless expressly authorised in writing by the sponsor.

Tessi encourages its employees, who are involved in the remote identity verification service, to report any illegal content identified or suspected in the performance of their duties and to use only the methods, tools and techniques made available to them.

Tessi maintains its commitment, including in the provision of a remote identity verification service, to comply with applicable national laws and regulations and best practice related to its activities.

► In practice

All players in the remote verification service must comply with the ethics rules set out above and in particular the following principles:

- They may only use the methods, tools and techniques made available to them by Tessi to carry out their duties;
- They undertake not to disclose any information obtained or generated in the performance of their duties to a third party, even if anonymised and decontextualised, unless expressly authorised in writing by the sponsor;
- They must report any illegal content, identified or suspected in the performance of their duties, to the relevant persons as soon as it is discovered;
- All their actions must be carried out with loyalty, discretion and impartiality.

This list of commitments does not provide an exhaustive answer to all the ethics questions that Tessi employees may face in the course of their duties.

All employees involved in the remote identity verification service must therefore exercise good judgement in each situation, in accordance with Tessi's values and this Code of Ethics and in compliance with the law.

If they are unsure of what to do or to report a breach (actual or suspected) of the rules of this Appendix, employees are encouraged to contact their line manager.



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