



# CODE OF **ETHICS**

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# Introduction

## TOP MANAGEMENT COMMITMENT

CS GROUP is a digital service company specializing in the design, integration, operation, and maintenance in operational condition of critical systems, particularly in the field of computer security.

The trust placed in us by our employees, our customers, shareholders and all our partners is partly due to our ethics in our business practices.

CS GROUP's Code of ethics is part of a process of transparency, integrity, and loyalty with all our stakeholders: customers, employees, shareholders, partners, suppliers, and civil society players.

Ethics, integrity, and regulatory compliance are key for CS GROUP and each of us shall apply these rules on a daily basis.

This Code of ethics has been drawn up in a realistic and pragmatic manner to provide the answers that may be required when facing tricky situation. This Code of ethics is also illustrating how we transform our values into actions.



CS GROUP has a voluntary approach in terms of ethics that can be illustrated with the following examples:

- We are a signatory of the United Nations Global Compact and support actively the ten principles of the Global Compact on human rights, international labor standards, environment, and anticorruption.
- We are actively promoting Corporate Social Responsibility by implementing a specific inhouse program called ReScuE and ensure continuous improvement by setting annual goals shown on external ratings.

**We are counting on each of you to support, implement and convey these values.**

## CS GROUP VALUES

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### CS GROUP VALUES ARE:

- 1
**Commitment** : CS GROUP continues to surpass itself in order to offer each customer the unique solution best suited to their needs.
- 2
**Proximity** : CS GROUP listens, shares and discusses with its customers in order to establish a tailor-made relationship for the success of their projects.
- 3
**Innovation** : CS GROUP offers its customers its expertise and its ability to adapt to their expectations thanks to its culture of work well done and mastery of its subjects.

### CS GROUP's core mission is to provide our customers with design, integration and operation of their critical systems based on:

- The defense of the highest standards of ethics, translated into professional rigor, commitment, loyalty, and solidarity,
- Personal development of CS GROUP's employees in promoting innovation, the acquisition of skills and sharing of expertise in a context of projects with cutting-edge technology,
- Sustainability by applying a long-term approach and reducing the impact of our activities on the planet by providing reliable systems.

### Our general objectives are thus reflected in:

- The anticipation and satisfaction of needs and expectations of our customers,
- A sustainable growth model implemented in France and internationally,
- The progression of the skills of our collaborators,
- The preservation of the environment.



## WHO DOES THE CODE OF ETHICS APPLY TO?

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**THE CODE OF ETHICS APPLIES TO EACH OF US, WHEREVER WE ARE AND WHATEVER OUR ROLE.**

In addition, CS GROUP encourages its third parties (e.g. partners, customers, and suppliers) to also adopt strict ethical standards.



## SPEAK-UP CULTURE

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CS GROUP encourages dialogue and ensure to its collaborators to openly express their legitimate concerns. If you have any question about a topic covered in this document, do not hesitate to contact:

- Your functional or operational hierarchy,
- A member of the legal department,
- A member of the human resources team.

**Furthermore, any wrongdoing can be reported thanks to the applicable whistleblowing procedure.**

# 1. Our employees

## 1.1 LEADERSHIP

### Fundamental principles

CS GROUP recognizes the role of managers in transforming and advancing the company, encouraging others to pursue collective goals, empowering, and coaching teams, and investing in improving performance.

We rely on the management to promote a culture based on integrity within CS GROUP.



### DOs

- ✓ Value, support and develop others, demonstrating a team spirit and proactively managing any risk or conflict.
- ✓ Promote a “Speak Up” culture where employees feel comfortable talking about risks or voicing concerns by taking the time to listen and foster dialogue and feedback.
- ✓ Make timely decisions and take personal care to act in accordance with this Code of ethics.

### DON'Ts

- ✗ Make complex decisions under pressure.
- ✗ Spread rumors, denigrate the work of team members or other colleagues.
- ✗ Think to have nothing to learn anymore.

## 1.2 HEALTH AND SAFETY

### Fundamental principles

Every person working for or with CS GROUP has the right to a healthy, safe and risk-free working environment.

CS GROUP commits to the highest standards in health and safety and applies the principles of the international standard ISO45001.

The group's priorities are:

- Protecting the employees from risks to health and safety that may arise from professional activities,
- Promoting a culture of health and safety in which each of us is responsible,
- Ensuring the proper management of the health, safety and well-being as an ethical imperative.



### DOs

- ✓ Take care of your health and safety as well as those of others.
- ✓ Report any hazard to health and safety.
- ✓ Commit to a goal of zero accidents or cases of illness due to work.

### DON'Ts

- ✗ Compromise on health and safety.
- ✗ Ignore the rules and procedures regarding health and safety.
- ✗ Fail to report accidents to your direct line manager or human resources manager.

## 1.3 DIVERSITY

### Fundamental principles:

Diversity is part of CS GROUP's identity.

We recruit, select, and contribute to develop the competencies of employees on the basis of merit independently from their origin, color, religion, sex, age, sexual orientation, gender identity, family situation, handicap or any other characteristic.

We strive to create an inclusive work environment which respects the differences of our employees.

CS Group is committed to diversity by signing the diversity charter and adopting an action plan related to professional equality between women and men, quality of life and working conditions within CS GROUP.



### DOs

- ✓ Favor pluralism and seek diversity through the recruitment and career development to help the company grow.
- ✓ Respect and promote the application of the non-discrimination principles in all the steps of human resource management, notably throughout hiring and promotions.
- ✓ Put in place performant and innovative teams, leaning on the collective strength resulting from the diversity of our staff.
- ✓ Report any behavior that appears to fall under bullying, harassment, or discrimination.
- ✓ Oppose to any inappropriate behavior and report any misconduct.

### DON'Ts

- ✗ Discourage or prevent others to grow professionally or exclusively focus on high-potentials- everyone has the right to develop.
- ✗ Practice all forms of harassment including expressions, gestures, comments, or importunate physical contact.
- ✗ Ignore signs of discrimination and harassment around yourself.

## 1.4 HUMAN RIGHTS

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### Fundamental principles

We respect the principles and fundamental rights mentioned in the Universal Declaration of Human Rights (UDHR).

CS GROUP does not tolerate any form of human rights violation including modern slavery and child labor whether it is in its activities and within its supply chain.

#### DOs

- ✓ Treat every person with dignity and respect.
- ✓ Recognize and report all forms of violations of human rights.
- ✓ Fight against child-labor and exploitation or other forms of compulsory work.
- ✓ Respect social European or national legislations and collective conventions in each country the group carries out its activities.
- ✓ Respect the trade union right in all countries.

#### DON'Ts

- ✗ Attempt to solve a problem yourself without using the mechanisms or channels of appropriate reporting.



## 1.5 LABOR LAW

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### Fundamental principles

By committing to respect the conventions of the International Labor Organization (ILO) and the Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, CS GROUP acknowledges to its employees the right to form, join and be active in trade unions and employee representative bodies, in accordance with national laws and collective agreements.

#### DOs

- ✓ **Work together in an open and respectful way. Teamwork is encouraged and both successes and failures should be shared.**
- ✓ **Foster social dialogue to ensure the fair and equitable treatment of all employees.**

#### DON'Ts

- ✗ **Interfere with or influence the free choice of employees to form or join an organization to represent their interests.**
- ✗ **Discriminate positively or negatively against union representatives compared to other employees.**



# 2. Business Ethics

## 2.1 ANTI-CORRUPTION

### Fundamental principles

Bribes, kickbacks, influence peddling or any other improper inducement involving government officials, customers, suppliers or any other counterparty is prohibited.

CS GROUP implements a specific anticorruption and antibribery compliance program in compliance with applicable regulatory requirements.

This program deals among others with:

- Situations of conflict of interests,
- Applicable rules in terms of gifts and hospitalities.

### DOs

- ✓ Manage our business with the utmost integrity, always respecting the anti-corruption laws in force as well as our internal policies and following the mandatory training on the subject.
- ✓ Report to your line manager any personal or professional relationship likely to give rise to a conflict of interest.
- ✓ Ensure that conflicts of interests are reported and managed.
- ✓ Respect the applicable rules when offering or receiving a gift or hospitalities.

### DON'Ts

- ✗ Offer, accept, or promise anything of value for the purpose of obtaining or retaining an improper advantage, including small amounts paid to expedite the completion of administrative proceedings (facilitation payments).
- ✗ Use a third party to make promises or payments that do not comply with CS GROUP's internal policies and guidelines.
- ✗ Conceal information about any real or potential conflict of interest.
- ✗ Be in a situation in which the personal interests may influence the professional decisions within CS GROUP.
- ✗ Receive or give cash gifts, personal services or goods and work carried out free of charge or under abnormal market conditions, gifts in the form of services or other benefits in kind (for example a promised employment).

## 2.2. EXPORT CONTROLS AND SANCTIONS

### Fundamental Principles:

Governments enact export control laws and impose sanctions and embargoes to protect certain interests, such as national security and the fight against arms proliferation.

Any violations of these laws have serious consequences on national and international security and can cause CS GROUP interruption of commercial activities or fines.

As such, we must make sure before collaborating or negotiating with a third party, or carrying out export, re-export or transfer of controlled items, to respect the applicable export controls regulations and sanctions regimes.

CS GROUP implements a specific export controls and sanctions compliance program in compliance with applicable regulatory requirements.

### DOs

- ✓ **Contact the Export control function if you are concerned by the export, re-export or transfer of controlled items (goods, services, software, technologies, etc.)**
- ✓ **Contact the Export control function as soon as possible during the launch of new projects to avoid any delay in delivery.**
- ✓ **Comply with sanctions and national or international embargoes and contact the export control function before launching new projects located in sensitive jurisdictions.**
- ✓ **Categorize the items (equipment, plans, drawing etc.) to facilitate the determination and licensing process.**

### DON'Ts

- ✗ **Forget to consider the necessary time to obtain an export license in the global calendar of the project.**
- ✗ **Assume that only hardware sales of military materials are subject to export restrictions.**

## 2.3. ANTI-MONEY LAUNDERING

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### Fundamental principles:

CS GROUP respects the laws relating to the fight against money laundering and against the financing of terrorism and accepts to only use funds coming from legitimate sources.

Moreover, CS GROUP maintains commercial relations with clients of good reputation exercising legal commercial activities.

Furthermore, CS GROUP refuses any contract that could favor or facilitate tax evasion of its suppliers, clients or third parties.

### DOs

- ✓ Pay attention to warning indicators that could lead to money laundering or terrorism financing.

### DON'Ts

- ✗ Accepting payments made by entities other than the client itself.
- ✗ Concluding an agreement whose elements or financial arrangements are opaque or insufficiently documented.
- ✗ Agree to reimburse a deposit to a third party to a bank account other than the one from which the initial payment has been done.



## 2.4. WORKING WITH THIRD PARTIES

### Fundamental principles

The nature of our work leads us to frequently collaborate with third parties. These may be customers, suppliers, distributors, resellers, advisers or any other person or entity that is not an employee or company of CS GROUP.

We are appreciated for the quality of the relationships we maintain with our third parties.

With respect to title 2.1, 2.2, 2.3 of our Code of ethics, we carefully assess the risk associated with our third parties before starting a collaboration and throughout the duration of the commercial relationship. We perform the risk based associated due diligences thereto.



#### DOs

- ✓ Properly categorize third parties to ensure they are subject to appropriate risk-based screening and investigation (due diligence) before engaging with CS GROUP.
- ✓ Control the work carried out to ensure that the third party provides the goods and services ordered from it, with professionalism and within the established deadlines.
- ✓ Take the necessary measures if the behavior of a third party is contrary to the principles of this Code of ethics.

#### DON'Ts

- ✗ Think that a well-drafted contract is enough to exempt CS GROUP from its legal liability.
- ✗ Turn a blind eye or fail to report a third-party concern.
- ✗ Attempt to override company policies on third-party selection and enhanced investigation (due diligence).

## 2.5. ANTITRUST AND COMPETITION LAW

### Fundamental principles

CS GROUP respects all stakeholders in the business environment, including its competitors.

We do not obtain competitive information by illegal or unethical means.

It is prohibited to share information with our competitors on matters such as pricing, costs or marketing strategies that may give the impression to agree on prices, sharing territories or other kinds of manipulation or distortion of competition.

Our compliance program aims at complying with the antitrust regulation applicable in the country where we are active.

#### DOs

- ✓ Promptly inform your hierarchy if you have accidentally received or used confidential or proprietary information concerning competitors.
- ✓ Just talk about generalities with the competitors.
- ✓ Distance yourself from meetings where competitors exchange commercially sensitive information.
- ✓ Abstain from any action depriving a competitor of a source of supply or commercial outlets.

#### DON'Ts

- ✗ Gather competitive information unlawfully or by failing to clearly identify yourself as an employee of CS GROUP when collecting such data.
- ✗ Engage in discussions relating to bid manipulation, price fixing or the allocation of markets or customers.
- ✗ Exchange information with competitors on prices, pricing methods or policies, margins, terms of sale, production capacities or participation in tenders.
- ✗ Agree or suggest exclusivity clause or other similar clause without first consult the Legal Department.

## 2.6. INFORMATION SECURITY AND DATA PRIVACY

### Fundamental principles:

In compliance with the laws and in the interest of CS GROUP, everyone must ensure to protect our assets, ensuring the confidentiality of information communicated or received, by not using them outside the professional realm, by respecting the confidentiality clauses, by not communicating sensitive information to others of the group to employees that are not authorized to know.

Particular attention should be paid to the confidentiality of information provided by our customers and the application of contractual rules or associated regulations. Any external requests for information, any audit, external or regulatory investigation must be subject to prior information to the Legal Department.

CS GROUP is committed to protecting the privacy of individuals and to complying with applicable personal data protection laws.

### DOs

- ✓ Respect applicable rules on information management.
- ✓ Safely store all confidential data of customers and suppliers, those in paper as well as electronic format.
- ✓ Before sharing inside information with person external to CS GROUP, check what you have the right to communicate.
- ✓ Collect personal data only to the extent it is strictly necessary to fulfil a lawful or legitimate purpose.
- ✓ Seek advice from the Data Protection team before transferring personal data.
- ✓ Immediately report any personal data breach.

### DON'Ts

- ✗ Discuss or work on inside information in public places where conversations can be heard, and data security may be compromised.
- ✗ Maintain internal information (including all copies) on a private device in the event of departure from CS GROUP.
- ✗ Assume that personal data collected for one purpose can be used for other purposes.
- ✗ Collect sensitive data (e.g. health data) if not required by law or agreed to by the data subject.

## 2.7. COMMUNICATION AND SOCIAL MEDIA

### Fundamental principles

CS GROUP's brand and reputation is one of our most valuable asset. We must promote and protect our brand coherently, consistently, and accurately to maintain our strengths on the market.

External and internal communication shall always be done by people authorized to represent CS GROUP.



#### DOs

- ✓ Send any request for comment from the media to the communication function.
- ✓ Secure approval before making any public statement about CS GROUP.
- ✓ Provide accurate information to the public regarding our business.
- ✓ Use care when speaking about CS GROUP on social media.

#### DON'Ts

- ✗ Provide information to the media without prior authorization and without the assistance of the service concerned.
- ✗ Post photos of CS GROUP sites on social media.
- ✗ Publicly denigrate CS GROUP or a competitor's products, services, or employees.

## 2.8. DIGITAL ETHICS

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### Fundamental principles

Digital technologies are becoming increasingly important in our company and our professional lives particularly with the use of AI systems.

While leveraging new digital technologies to enhance our business performance and customer satisfaction, we also commit to respect applicable requirements and recommendations on trustworthy AI by strengthening protection against cyber-attacks, respect ethical rules (fairness, privacy and non-discrimination, etc.) and be explicable and transparent to the best extent possible.

✓ **Use digital technologies in the service of the human being to enrich our customer experience as well as to develop the competencies and skills of our teams and every individual.**

✗ **Develop AI systems that would not meet trustworthy AI regulatory requirements.**

## 2.9. PRIVILEGED INFORMATION

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CS Group is a subsidiary of Sopra Steria whose shares are admitted to trading on the Euronext Paris market.

In the event of knowledge of privileged information, we must refer to the SOPRA STERIA's applicable procedures.



# 3. Honoring our commitments as a responsible company

## 3.1. POLITICAL ACTIVITIES

### Fundamental principles

CS GROUP makes no contributions to political parties, politicians, and related institutions.

CS GROUP respects the rights of each employee to participate in a personal capacity in political activities when it is clear that by doing so, the employee is not representing the company.



### DOs

- ✓ If you participate in personal political activities, clearly indicate that you do not represent CS GROUP in any way.
- ✓ Inform your hierarchy if your participation in political activities could prevent you from fulfilling your functions or create confusion between your political positions, and CS GROUP.

### DON'Ts

- ✗ Use company funds and resources (including your working time, telephone, paper and any other property of the company) in order to support personal political activities.
- ✗ Make politics in the workplace.
- ✗ Let people think that CS GROUP supports your personal political activities.

## 3.2. ENVIRONMENT AND SUSTAINABLE DEVELOPMENT

### Fundamental principles

CS GROUP is committed to acting responsibly and to protect the environment in its operations and throughout its value chain. We commit to respect the environmental laws and regulations in force wherever we are active.

CS GROUP makes its decisions by ensuring the compatibility between its economic objectives and the principles of sustainable development.

#### CS GROUP also applies a voluntary approach in favor of sustainability by:

- Developing a digital eco-design approach (also known as green IT) where the carbon footprint is taken into consideration in the design of our solutions,
- Adhering to PLANET TECH'CARE that promote green IT,
- Embedding our suppliers in our sustainable approach by adhering to sustainable buyer guidelines and requiring from critical suppliers to have a sustainable voluntary approach verified with an external rating.

#### DOs



Apply a sustainability by design approach in what we do.

#### DON'Ts



Tolerate within our supply chain practices that are environmentally unacceptable.

## 3.3. BEING A CORPORATE CITIZEN

### Fundamental principles

CS GROUP is taking into consideration its social responsibility and may adhere to local initiatives linked to its activities or values.

As an example, CS GROUP adhered to ELLES BOUGENT to promote female vocations in engineering professions in aeronautics, space, rail transport, etc.

#### DOs



Ensure to act as a corporate citizen by promoting local initiatives.

#### DON'Ts



Adhere to political initiatives.