

TAKOMA 2024 ETHICS CHARTER

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I. FUNDAMENTAL PRINCIPLES OF THE TAKOMA ETHICS CHARTER

A. Why a TAKOMA Ethics Charter?

The TAKOMA Ethics Charter sets out the values that the company stands for. It's a best practice guide that goes beyond laws, regulations and internal company rules.

The Ethics Charter concerns all stakeholders: employees, suppliers, subcontractors, clients, partners and other organisations with which the company has a relationship. All employees must comply with it and be familiar with it, including "seconded" employees.

It encourages responsible and exemplary behaviour and provides guidance in the event of a situation, inappropriate behaviour or any other breach of the rules of good conduct.

The Charter covers all subjects: health and safety, personal integrity, good business management, as well as TAKOMA's CSR strategy commitments.

The aim is to prevent any risk of corruption, harassment, money laundering or inappropriate behaviour.

B. TAKOMA's ethical commitment

TAKOMA is committed to complying with the laws and regulations applicable in France and in countries where the company may conduct its activities, no matter how insignificant or infrequent it might be. Respect for the law is a fundamental and essential value.

TAKOMA develops its business around values that place people at the heart of its activity.

Solidarity, sharing, trust, client focus and ethical, sustainable and responsible business development are the key values that the company stands for.

In terms of TAKOMA's CSR strategy, the Social pillar is based on the principle of principled development of human capital, which implies fairness, transparency and protection for employees.

All TAKOMA employees take measures to uphold the values of fairness, transparency, the fight against corruption and against moral or sexual harassment, whatever their hierarchical level or status within the company.

II. ENSURING HEALTH AND SAFETY FOR ALL

TAKOMA offers working conditions that guarantee health and safety for all.

In order to guarantee the health and safety of our employees, identified risks and preventive actions are recorded in the 'What is the Single Occupational Risk Assessment Document' (DUERP).

This Document is updated regularly and can be consulted by all employees in the shared space (link: https://agencetakoma.sharepoint.com/sites/Portail_Takoma).

All employees are obliged to follow the rules of good conduct, and preventive recommendations set out in the document.

Employees can recommend that this document be updated and added to if there are proven cases of risks that are not being taken into account or are only being taken into account to a limited extent.

Any recommendations or comments may be communicated to your superiors and should be sent by email to: ethique@takoma.fr.

III. PREVENTING HARASSMENT AND DISCRIMINATION

TAKOMA treats its employees fairly and is committed to a balance between men and women, and equal treatment with regard to gender.

TAKOMA is committed to respecting individual freedoms and human rights. All forms of discrimination, whether sexual, ethnic, religious, social, trade union or political, are excluded. Inappropriate behaviour towards people in vulnerable situations is prohibited.

TAKOMA ensures equal opportunities for all. When recruiting, promoting or changing jobs, only professional skills are taken into account.

Within the framework of fundamental freedoms, all TAKOMA employees are required to behave appropriately. No political activity or religious practice is tolerated in the workplace or during working hours. These activities must take place outside working hours, with respect for others.

TAKOMA has set up a procedure that alerts us about any form of discrimination, whether religious, ethical, cultural or linked to sexual orientation.

Anyone can contact the "Harassment & Discrimination" advisor, Karine Zedde (karine.zedde@takoma.fr), or the Human Resources department.
Victims and witnesses can report incidents in complete confidentiality. A specific internal communication is available to all TAKOMA employees.

IV. GUARANTEEING DATA SECURITY AND PROTECTION

TAKOMA has set up an IT data security procedure (GDPR). This procedure is regularly updated and can be consulted internally or by anyone would like to consult it.

Link: <https://www.takoma.fr/en/data-privacy/>.

Everyone must comply with all of the procedures, which also cover documents sent externally (emails, business proposals, quotations, contracts).

Any attempt to use personal or commercial data to exert pressure (moral or sexual harassment) is strictly prohibited and may result in severe penalties.

Any action such as installing software, producing documents or communicating data with defamatory or illicit content is strictly prohibited and liable to severe penalties.

Due to the sensitive nature of the information involving certain major accounts, TAKOMA employees may be required to sign a confidentiality clause. This confidentiality clause must be strictly adhered to by all signatories, regardless of their status within the company or the nature of their employment contract (permanent, fixed-term, trainee, work-study program).

V. ADOPTING BEST PRACTICES IN BUSINESS MANAGEMENT

A. Fighting corruption

TAKOMA does not tolerate any corrupt practices and strives for total transparency and fairness towards its partners, suppliers, subcontractors, clients and prospects.

All employees are committed, in the context of commercial practices (sales, negotiations, purchases), to preserving and not undermining TAKOMA's integrity.

Any pressure or fraudulent attempt from a person outside the company (buyer, supplier or other stakeholder) must be reported to management as quickly as possible.

Any identified fraudulent act, whatever its origin, must be reported. It can result in severe penalties.

This commitment also applies in the context of negotiations for the purchase of companies, and for TAKOMA personnel involved in acquisition projects.

These principles also apply to all business relationships in the broadest sense, including public and private sector partners, associations, banks, insurance companies and other organisations.

Business gifts, invitations, lunches and other gratuities are prohibited, with the exception of those that comply with the rules in force within TAKOMA. However, they must be visible, declared and remain exceptional in nature and of moderate value.

Any proposal for a "gift" or "invitation" must be communicated upstream to the employee's hierarchy for prior approval.

B. Balanced and transparent commercial relations

Customer satisfaction is at the heart of TAKOMA's concerns.

TAKOMA treats all its clients' requests fairly and equitably.

Client files are all honoured and monitored by TAKOMA personnel with the same degree of involvement, regardless of the nature of the project and the amount of the contract.

Discretion must be respected in every case, and fair practices must be applied.

Any attempt to discriminate against a contact person, to prioritise a file or to take favourable action on behalf of a client is totally out of the question and punishable by law.

C. Competitive practice

TAKOMA bans any practice of unfair competition towards its clients, prospects and partners.

The principle of confidentiality must be respected in commercial practices.

Any tactics likely to distort good commercial practice (price-fixing agreements, market sharing, abuse of a dominant position in a sector or service) are strictly prohibited.

Proven misconduct may result in sanctions, up to and including termination of employment.

Dissemination of confidential client data to third parties, such as the price of a service, is also totally prohibited and may result in legal action.

D. Responsible Purchasing

TAKOMA is a signatory of the Sustainable Purchasing Charter.

The Sustainable Purchasing Charter commits us to adopting best practices towards all of our suppliers and subcontractors, and to respecting our values (a relationship based on trust, balance and fairness).

TAKOMA is committed to developing commercial relations with partners who are committed to reducing their environmental and social impact, who are irreproachable in terms of human rights and who respect the health and safety of their employees.

Any interference by a partner in the face of legal obligations in terms of human rights, fundamental freedoms, safety and security at work, would lead to a breakdown in the commercial relationship with the supplier or subcontractor.

VI. DUTY OF CARE

TAKOMA implements measures to prevent risks to human rights, the health and safety of employees and the environment, for activities carried out within the company, but also for upstream and downstream activities throughout the value chain (suppliers, subcontractors, clients).

As part of its Sustainable Purchasing policy, TAKOMA ensures that all its suppliers and subcontractors comply with ethical codes.

VII. IMPLEMENTING DIGITAL SOLUTIONS THAT HAVE A POSITIVE IMPACT ON PEOPLE AND THE ENVIRONMENT

TAKOMA complies with current regulations concerning the legal provisions in force regarding the protection of the environment.

TAKOMA is fully aware of the environmental and social challenges associated with its core business: digital technology.

The digital sector is responsible for 4% of greenhouse gas emissions, and has a significant impact on society, particularly when it comes to equipment.

Through its actions, TAKOMA aims to significantly limit the environmental and social impact of this activity. Its Responsible Digital approach structures all its actions on this major theme, particularly in terms of services designed in an eco-responsible way that takes into account the life cycle of products and services.

Our employees are key players in TAKOMA's CSR approach.

In order to contribute to the smooth running of the CSR strategy, each employee must strive to implement actions which are possible at their level, commensurate with their commitment and involvement.

Any deliberate act, such as a negative incentive or counter-productive action, that runs counter to the objectives set and the CSR action plan cannot be accepted. The CSR plan is an integral part of the company's strategy.

VIII. MONITORING PROCEDURE - WARNING SYSTEM

TAKOMA, in the interests of transparency, encourages all employees to report any problem linked to shortcomings, doubts or erroneous information that may be prejudicial to the smooth running of the company and contrary to the principles of the Ethics Charter.

Any information or alerts can be passed up the chain of command.

However, any TAKOMA employee, as well as any person outside the company, may report a breach with regard to the rules of good conduct, or inappropriate behaviour, to the e-mail address provided for this purpose mail:

ethique@takoma.fr.

Reports submitted via the address: ethique@takoma.fr are systematically recorded, whatever the reason, the degree of importance, and the type of follow-up to be given to the file in a document: Follow-up_ethical_alerts_TAKOMA

All information received is treated in the strictest confidence. Following the e-mail, a discussion may take place with the Ethics Representatives to supplement the information. If a decision is taken to proceed, an investigation may be opened, depending on the nature of the report.

Failure to comply with the Code of Ethics principles may result in disciplinary action. The nature of the problem: non-compliance with internal regulations, collective agreements, individual freedoms and human rights, leading to varying levels of sanctions

The content of the Code of Ethics may be amended at any time, in response to new situations or changes in regulations.