BUSINESS ETHICS CHARTER



EDITO

Wavestone is committed to **being a trusted partner** by maintaining a transparent, responsible and sincere relationship with its clients, suppliers and partners.

The Business Ethics Charter sets out the key principles to ensure this commitment while providing a clear framework for acceptable and unacceptable behaviour and situations. Each employee, as an ambassador of Wavestone, must be aware of these principles and commit to respect them.

COMPLIANCE WITH THE LEGISLATION IN FORCE

All employees must act in accordance with the laws, regulations and standards that regulate the professional environment in the country where they work.

They must comply with the <u>Middlenext Anti-Corruption Code of Conduct</u>, adopted by the firm in December 2017.

Any illegal practice must be prohibited, including non-compliance with competition rules or unlawful agreements.

SINCERITY AND LOYALTY TOWARDS CLIENTS

Wavestone is committed to:

- / Making tenable commitments in its commercial offers with its clients.
- / Providing authentic commercial references and CVs.
- / Providing sincere and transparent information concerning the progress of an assignment.
- / Formulating its recommendations in the exclusive interest of its clients, without any further consideration.
- / Working with the (potential) suppliers of its clients with loyalty and fairness.
- / Preventing situations of conflict of interest or, alternatively, informing the client of such situation as soon as it is identified.

RELATIONS WITH SUPPLIERS

Wavestone is committed to:

- / Acting with fairness, transparency and impartiality in all stages of selecting a new supplier, and towards all bidders.
- / Respecting its contractual commitments with its suppliers, particularly in terms of payment deadlines, confidentiality agreements and nonsolicitation.
- / Asking its subcontractors to subscribe to all the commitments in this charter

DATA PROTECTION

Wavestone is committed to protecting the confidential data of its clients and suppliers, including their personal data. In this sense, any NDA or any confidentiality & security clause included in a contract signed between Wavestone and a client or supplier must be respected following Wavestone security procedures.

APPLICATION OF THE BUSINESS ETHICS CHARTER

Wavestone has put in place various means to enable employees to take ownership of the charter and apply it on a daily basis:

- / It is the responsibility of each employee to report any situation that does not seem to comply with this charter.
- / If the alert could not be treated by the management or if the person does not wish to reveal his/her identity, a <u>system accessible to all</u> enables questions to be asked and unsuitable situations to be raised in an entirely anonymous manner. An Ethics Officer will then be in charge of dealing with the alert.
- / Resources are available to employees, such as the Information System user charter or the address <u>WL Ethics Officers</u> to answer any questions related to these topics.