

Business Ethics Charter

Wavestone is committed to ensuring ethical business practices and fighting against corruption, conflict of interest, and any other form of fraud or illicit practice. Wavestone strives to be a trusted partner by maintaining transparent, responsible, and sincere relationships with its various stakeholders (clients, employees, suppliers, subcontractors, and partners).

The purpose of this charter is to present the principles to ensure ethical behaviors in day-to-day activities in a rapidly changing environment (e.g., artificial intelligence). All employees, managers, and business partners* acting on behalf of Wavestone are expected to:

- Be aware of their obligations and act in an ethically responsible manner that is beyond reproach;
- Commit to respecting and upholding these principles;
- Report any situation that they believe does not comply with this Charter;
- Act in accordance with applicable laws, regulations, and standards in the countries where they operate.

This charter is based on the principles of the Middledex Anti-Corruption Code of Conduct.



Honesty & loyalty

Wavestone employees are sincere and transparent in their dealings with all stakeholders.

Towards customers

Wavestone is committed to:

- Make tenable commitments in any commercial offer to customers;
- Provide trustworthy data throughout the business relationship (business references, CVs, assignment progress etc.);
- Work with all customers' suppliers (when existing) with loyalty and fairness.

Towards suppliers

Wavestone is committed to:

- Act fairly, transparently, and impartially towards all bidders, during all phases of the selection process for a new supplier;
- Fulfill its contractual commitments to suppliers, particularly in terms of payment deadlines, confidentiality agreements, and non-solicitation agreements;
- Ask its subcontractors to fully commit to all the principles of this Charter.

Data protection

As a responsible player, we do everything in our power to ensure the protection of sensitive data.

Wavestone is committed to:

- Guarantee the confidentiality of customer and supplier data, including personal data, by default;
- Comply with any NDA or confidentiality and security clause contained in a contract signed between Wavestone and a client or supplier, in line with Wavestone's security procedures.

Conflicts of interest

Employees perform their duties in a selfless manner. As such, they must avoid any situation of conflict of interest.

Wavestone is committed to:

- Prevent conflicts of interest and unfair competition;
- Inform clients and partners of any such situation as soon as it is identified;
- Comply with the law and competition rules when responding to calls for tender.

Gifts & invitation

- Gifts and invitations must not be such as to call into question the impartiality of the parties in current or future dealings;
- The gift or invitation must be offered within a professional context. Its value must be in line with the firm's guidelines.



In addition to the FAQ and mobilization of management and HR teams, two channels are available to support employees and facilitate reporting of alerts:

- Whispli, an anonymous alert system accessible to all,
- Ethics Officers, who can be contacted directly at ethicsofficers@wavestone.com

These channels can be used to ask any questions related to the Charter and its application, to report situations that may be inappropriate, and to help define the most appropriate response, while ensuring the protection of whistleblowers.

*business partners: consultants, intermediaries, joint venture and consortium partners, as well as their employees