

## CODE OF CONDUCT

Founded in October 2003 under the corporate name PC30, SOLUTIONS 30 sought to provide services relating to computers and digital equipment right from the beginning. Now present in seven European Member State countries and organized around a network of local technical experts, SOLUTIONS 30 has become Europe's leading provider of support services relating to new technologies.

SOLUTIONS 30 Group's ambition is to make the technological changes that transform our daily lives accessible to everyone, individuals and businesses alike: **yesterday**: computers and the Internet; **today**: digital; **tomorrow**: the technologies that will make the world ever more connected in real time.

SOLUTIONS 30 has a reputation for excellence, honesty and integrity in its management practices and in all its business transactions. It is, therefore, of paramount importance, for SOLUTIONS 30 Group (including each subsidiary), and each of its employees and members, to preserve this reputation and maintain the relationship of confidence and trust that must exist with all the individuals and companies with whom SOLUTIONS 30 Group is dealing.

End-customer satisfaction is SOLUTIONS 30's priority cornerstone and purpose.

Our basic values and principles guide our conduct and set the expectations, standards and ethical practices that underpin all our dealings; therefore, the aim of this Code of Conduct shall promote the moral culture and ethical values which represent the basis of this satisfaction.

This Code of Conduct applies to all directors, officers and employees of SOLUTIONS 30 Group including its subsidiaries worldwide or all persons working for or on behalf of SOLUTIONS 30 Group. It is aimed to assess and understand the ethical and legal obligations in handling SOLUTIONS 30's activity. Although this Code of Conduct does not cover every issue that may arise, it is intended to establish guidelines to which it can be referred about in situations where the proper course of conduct may not seem clear. It shall help each employee of the SOLUTIONS 30 Group or person who works with SOLUTIONS 30 Group to take the right decisions in respect of our core values and principles of conduct.

SOLUTIONS 30 code of conduct objective is to set up a culture of openness, trust and integrity in business relationships. In addition to technical engineering necessary for this objective, recruiting criteria of our employees are strongly influenced by these culture and values of our Group.

The guidelines set out in this code of conduct are mandatory and, as such, must be observed by every one of us at all times.

**SOLUTIONS 30 VALUES TO MEET OUR CUSTOMERS' SATISFACTION:**

The main values shared by our Group are the following: (i) dedicated sense of customer service; (ii) honesty, integrity and professional awareness; (iii) compliance with laws and regulations; (iv) anti-corruption policy; and (v) protection of the environment.

## **1. DEDICATED SENSE OF CUSTOMER SERVICE**

SOLUTIONS 30 Group prosperity is founded on customer satisfaction; therefore, SOLUTIONS 30 invests all its energy and talent in helping its end customers to find a solution to their everyday technological problems via an outstanding quality service.

SOLUTIONS 30 Group expects each member of SOLUTIONS 30 Group to preserve the quality of customer relations by maintaining business relationships that are based on integrity, fairness and mutual respect. Only clear, concrete, pertinent and honest information is to be given to customers. SOLUTIONS 30 Group members must be careful to avoid making any statement to a customer that could be misinterpreted.

Consequently, SOLUTIONS 30 Group does not tolerate the making of promises to customers which will probably be impossible to keep, regarding product quality and characteristics, delivery times and prices.

SOLUTIONS 30 Group commitments can be proved everyday through direct contact of our technical engineers with our end customers, on site, in order to make technology and digital accessible for everybody. Our values are based on respect and courtesy; duty of discretion and confidentiality; pedagogical assistance and advice.

## **2. HONESTY, INTEGRITY AND PROFESSIONAL AWARENESS**

Honesty, integrity and fairness are our rules in any circumstances as far as the working procedures of SOLUTIONS 30 Group and its employees are concerned.

In any commercial attitude, honesty and integrity must be the priority of each member of SOLUTIONS 30 Group. SOLUTIONS 30 Group members make a point at always acting with professional awareness: efficiency, promptness, reactivity and proactivity.

SOLUTIONS 30 does not accept any form of harassing or discrimination. Each member of SOLUTIONS 30 Group shall combat all forms of discrimination. Therefore, each member has to provide a working environment free from any form of harassment and to ensure that each employee is treated fairly and with dignity; so that any discriminatory practice based on race, colour, sex, age, religion, ethnic or national origin, disability or any other illegal basis will never be tolerated, it being understood that the distinction between individuals based on the skills or qualifications required for a particular job does not constitute discrimination.

SOLUTIONS 30 Group's suppliers are to be chosen in consideration of objective criteria, based on quality, reliability, price, utility and performance or service. Suppliers are to be treated justly, fairly and honestly. Fees and commissions are to be paid to consultants only in the course of ordinary business relations. Any fees must be substantiated by documentation demonstrating that the amount charged is commensurate with the value of the services rendered.

Each member of the Group has to comply with these principles within or outside the SOLUTIONS 30 Group towards its customers, suppliers or any other third parties.

## **3. COMPLIANCE WITH LAWS AND REGULATIONS**

SOLUTIONS 30 Group and its employees worldwide must observe and comply with every local, state, federal, national, international or foreign law or regulation that applies to SOLUTIONS 30 Group activities.

Members of SOLUTIONS 30 Group must in any circumstance act in SOLUTIONS 30 Group's interest and in compliance with applicable laws and regulations.

If SOLUTIONS 30 Group members are unsure whether a particular legal provision is applicable or how it should be interpreted, they should consult the competent supervisor or the Legal Department. Many of SOLUTIONS 30 Group's activities are subject to complex and changing legislation governing domestic and international trade and commerce.

In particular without being exhaustive, all members of the SOLUTIONS 30 Group must respect laws in the following fields: human rights, labor and employment, quality rules, health and safety, corruption, competition and environmental protection.

SOLUTIONS 30 Group shares these principles with its business partners and make sure to the best of its knowledge that they undertake to comply with the same laws and rules.

#### **4. ANTI CORRUPTION POLICY**

SOLUTIONS 30 Group has zero tolerance towards corruption in all of its business activities across the entire SOLUTIONS 30 Group; this implies in particular that corruption in any kind and form is strictly prohibited, active or passive, direct or indirect, for the benefit of those in the public or private sector. Bribery could occur in both the private sector and the public sector.

To this end, SOLUTIONS 30 Group members will never directly or indirectly offer or give anything of value to any government official, including employees of state-owned enterprises, for the purpose of influencing any act or decision in order to assist SOLUTIONS 30 Group in obtaining or retaining business or to direct business to anyone. SOLUTIONS 30 Group members will also ascertain that any agent that is engaged to conduct business on behalf of SOLUTIONS 30 Group are reputable and that they also shall comply with these guidelines.

This anticorruption policy is adopted not only to comply with national and international laws combating corruption but also to best position SOLUTIONS 30 Group to protect its reputation and to uphold our commitment to carrying out business fairly, honestly and openly, in accordance with the highest ethical standards.

Practices that violate these principles will not be tolerated and breaches of this policy can lead to disciplinary and other actions up to and including termination of employment or agreement in case of sub-contractors.

##### **4.1.Principles and rules:**

Bribery means, any offering, promising or giving (active bribery) and soliciting, demanding, receipt, agreement to the receipt or acceptance (passive bribery) of anything of value as an inducement of an action (or lack of action) which is improper, illegal, corrupt, unethical or a breach of duty. Any attempt to bribe shall be included in this definition.

In particular, **are strictly prohibited:** bribery, extortion and solicitation, trading in influence, laundering the proceeds of corrupt practices.

##### **4.2.Compliance with applicable laws and international conventions:**

The SOLUTIONS 30 Group's companies shall apply all international conventions on combating corruption and the anti-corruption laws in force in the countries where they do business. Each entity of

SOLUTIONS 30 Group shall therefore take all necessary steps to inform its employees, its associated persons and third parties of their respective relevant obligations, responsibilities and applicable offences in light of their respective local laws and regulations.

#### **4.3.SOLUTIONS 30 policies:**

**Giving and receiving bribes:** employees including agency workers and contractors must never promise, offer or give a bribe; they must never request or accept a bribe; no employee will suffer demotion, penalty or other adverse consequences for refusing to pay or receive bribes, even if the refusal may result in the SOLUTIONS 30 Group losing business.

**Gifts and hospitality policy:** Gifts, hospitality, and entertainment must be modest, reasonable and infrequent so far as any individual recipient is concerned. In general, offers of entertainment in the form of meals and drinks may be accepted, provided that they are reasonable, infrequent and, as much as possible, reciprocal.

#### **4.4.It is strictly forbidden to:**

- 4.4.1. Give, promise to give, offer or solicit a payment, gift, travel, hospitality or other benefit with the expectation or hope that a business advantage will be received, or to reward a business advantage already given ;
- 4.4.2. Give, promise to give, or offer a payment, gift, travel, hospitality or other benefit to a governmental representative to “facilitate” or expedite a procedure;
- 4.4.3. Accept payment or the promise of payment from a third party in case of suspicion it is offered with the expectation that it will obtain a business advantage;
- 4.4.4. Accept a gift, hospitality, travel or other benefit or the promise of such from a third party in case of suspicion it is offered with the expectation that a business advantage will be provided in return.

**4.5. Facilitation payments:** SOLUTIONS 30 Group does not tolerate facilitation payments.

## **5. CONFLICTS OF INTEREST**

SOLUTIONS 30 Group’s members shall always act in the best interests of the SOLUTIONS 30 Group and they must, therefore, avoid any situation where our personal interests conflict or could conflict with our obligations towards the Company.

Practices that violate these principles will not be tolerated and breaches of this policy can lead to disciplinary and other actions up to and including termination of employment or contract.

As these instructions cannot cover every eventuality, SOLUTIONS 30 Group members are all required to exercise good judgment.

## **6. TRADING IN THE SECURITIES OF THE COMPANY**

SOLUTIONS 30 SE is a company whose shares are admitted to listing and trading on a stock exchange; therefore, if some employees or members of the SOLUTIONS 30 Group decide to acquire, any shares issued by any listed company in the SOLUTIONS 30 Group, they must be aware that the purchase of securities of any corporation listed on a stock exchange entails a certain risk and that the corresponding assessment to purchase listed shares is strictly a personal one.

Additionally, securities laws prohibit us from purchasing, selling or otherwise trading in or recommending, for our own account or for others, any securities of corporations where SOLUTIONS 30 Group members are in possession of any «*material inside information*» concerning the captioned company. Communicating such inside information to others is equally also prohibited. For more information, please refer to our dedicated policy.

## **7. PROTECTING THE ENVIRONMENT**

Facing the growth of technological improvements and technological costs that are unfortunately involved, our Corporate Social Responsibility (**CSR**) is to contribute to sustainable development issues.

Our objective is to take into consideration social and environmental impacts to our activity in order to take steps and contribute to improve our society and protect environment. CSR allows us to combine economic decisions and social responsibility.

Consequently, SOLUTIONS 30 Group has taken several decisions in order to inform its employees about issues regarding sustainable development and CSR (incentive for saving energy: how to reduce paper use, save electricity, reduce travelling etc.).

SOLUTIONS 30 Group's customers are also fully aware of environment respect matters and take measures to reduce the impact of their activity on environment. For more information, please see our corresponding policies.

## **8. PROPERTY OF THE COMPANY**

The loss, theft or inappropriate use of SOLUTIONS 30 Group's property is bound, sooner or later, to affect its profitability. Consequently, the protection of SOLUTIONS 30 Group's property by each one of us is a matter of integrity and honesty. SOLUTIONS 30 Group's property must be used exclusively for its activities and can thus in no circumstance be used for personal purposes.

In this context, inventions, ideas, documents, software, patents and other forms of intellectual property related to SOLUTIONS 30 Group's activities, created or conceived by employees in connection with the performance of their duties, belongs, on that basis, to SOLUTIONS 30 Group.

## **9. A SHARED RESPONSIBILITY**

Each one of us is responsible for adhering to the values of SOLUTIONS 30 Group in our daily lives as employees or member of any of the SOLUTIONS 30 Group's companies and for making every effort to ensure that our rules of conduct are respected by all.

Conduct that is contrary to these rules is punishable by disciplinary action up to and including termination of employment or contract, in compliance with all applicable laws and procedures.

## **10. WAIVERS OF THIS CODE OF CONDUCT**

A waiver of any provision of this Code of Conduct will only be given if it is deemed absolutely appropriate under the circumstances on a case by case basis and by the competent organ depending from the circumstances.

## **11. REPORTING ANY ILLEGAL OR UNETHICAL BEHAVIOUR**

Any behaviour that deviates from this Code of Conduct should be reported immediately to a dedicated supervisor, a member of management or the head of the Legal Department.

It is the policy of the Company not to allow retaliation of reports of misconduct by others made in good faith. Employees and members of SOLUTIONS 30 Group are expected to cooperate in internal investigations of misconduct.

**April 23<sup>rd</sup> 2019**