

**PUBLIC**

**Global policy**

# **Global Code of conduct and ethics**

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## A message from our CEO

Dear Associate,

At Foundever, we are proud of our company's high ethical standards, respect for people and commitment to having a positive impact around the world.

We strive for excellence in what we do and how we do it. We value honesty and integrity in our business practices and are committed to providing the best customer service through maintaining respectful relationships with all interested parties.

At Foundever, we believe conducting business with a high standard of professional conduct, ethics and proficiency is critical to our success and our clients' success. We continually strive to achieve the highest quality standards and the best results for our clients.

We further believe we can only achieve these goals by conducting business with integrity and in accordance with the highest ethical standards, in compliance with all applicable laws and regulations and by respecting accepted international standards for human rights.

The commitments contained in this Code are our guide and they extend to all of our Associates (including officers and directors) and other company representatives. We recognize that with our global footprint and the diversity of cultures in which we operate, this Code cannot address every situation that might arise. It should, however, provide the basic principles and core behaviors to help you resolve the ethical issues you may face on a day-to-day basis. Our Code is a summary of principles to guide our business dealings, our communications and our conduct.

We expect you to be well informed and exercise good judgment when making business decisions. We all have a responsibility to ensure the principles of this Code are taken seriously. If you see something that doesn't seem ethical or right, speak up! Foundever prohibits retaliation against any employee who in good faith seeks guidance or reports a possible violation of our ethical standards.

Given the importance of the Code to all of us and the way that we do business, we trust you will read it with due care and attention. Thank you for your commitment.

**Laurent Uberti**

President & CEO, Foundever

## OUR COMPANY

People are Foundever's most important asset and top priority.

### 1. We treat each other fairly and respectfully

Foundever (or the "Company") believes our Associates are the core of our business and we conduct our business with respect for, and adherence to, principles of diversity and equal employment opportunity.

Our Associates are entitled to work in a place which is free from harassment, discrimination, harsh treatment and acts or threats of violence. It is our goal to promote an environment that encourages open communication, promotes mutual respect and teamwork, and develops leaders.

We maintain a diverse and inclusive work environment where the cultural differences of our Associates are embraced. Associates are expected to be respectful of local customs and honor local laws, rules and regulations.

#### What it means to you

- Treat others with respect and dignity. Never engage in, nor tolerate the abuse, harassment or discrimination of Associates, contractors, clients, suppliers or others;
- Do not make any statement concerning a person's race, color, ethnic or national origin, religion, sexual orientation/identity, gender, disability or age, if such statement is likely to make any individual or group of individuals feel unwelcome, offended or uncomfortable;
- If you are a leader, make sure employment decisions - including hiring, promoting and compensating - are based on lawful business reasons. Applicants and Associates should be evaluated and compensated based on their qualifications, demonstrated skills and achievements; and
- Speak up if you become aware of any action or omission that may conflict with these principles of fairness and respect, including actions or omissions by or on behalf of our clients, vendors or their employees or affiliates. As discussed in more detail below, you can report your concerns to your direct supervisor, Human Resources or the Legal Department or use the EthicsPoint hotline.

### 2. We protect the health and safety of our people

The health and safety of Associates, contractors, suppliers and the public are of utmost importance to Foundever. We comply with all applicable health and safety laws and regulations and are committed to providing a safe and healthy work environment that minimizes work-related injury.

#### What it means to you

- Act in a safe manner;
- Participate in safety drills and training; and

- Promptly report unsafe conditions, hazards or workplace accidents to your manager, Human Resources or Facilities personnel.

### **3. We provide accurate information for use in reports, audits and official corporate communications**

Communicating and recording accurate information for use in reports, audits and official corporate communications is vital to our image and is required to meet regulatory and legal obligations. Foundever prepares periodic reports capturing certain financial information required by regulating agencies or other Company stakeholders. It is our obligation to make full, fair, accurate, timely and understandable reports in accordance with applicable laws and other requirements.

All representations made by Associates concerning our products and services must be accurate, current and not misleading. This is particularly important when engaging in any communication made outside Foundever, including, but not limited to, marketing materials, press releases, Internet posts, blogs, customer meetings and sales presentations. Only people authorized by our Corporate Communications Department may speak as a Company representative or about our Company with the press or at external events, conferences or forums.

#### What it means to you

- Make sure information you disclose about our Company is accurate, clear and truthful;
- Submit accurate entries and receipts for expense reports and timekeeping information;
- Process and record transactions in a timely and accurate manner;
- Do not knowingly misrepresent, omit or cause others to misrepresent or omit material facts about Foundever, whether inside or outside the Company, including our independent auditors;
- Cooperate with internal and external audits sanctioned by Foundever;
- Consult with the Legal Department before responding to requests for information from government agencies and regulators;
- Do not speak on behalf of Foundever unless you are authorized to do so; and
- Direct any inquiries from the media and other organizations to the Corporate Communications Department.

### **4. We protect confidential information**

Foundever is committed to protecting the confidential information of the Company, our Associates, our clients and their customers and other stakeholders. “Confidential Information” includes information regarding the development of trade secrets, business systems, proprietary processes, products, know-how and technology, client lists, vendor lists, pricing lists, non-public sales and profit data, strategic business plans, trademarks, service marks, patents and copyrighted material, as well as internal reports, procedures, and other internal business-related confidential communications. This also includes any such Confidential Information entrusted to the Company by our clients, their customers and other third parties.

Certain Associates may be given access to sensitive personal information about other Associates or our clients' customers as part of their job duties, such as government-issued identification numbers, credit card information, bank account information, PIN numbers, or personal health information. This information is also included within the definition of "Confidential Information." Associates who are granted access to Confidential Information as part of their job duties are responsible for protecting such Confidential Information from disclosure, inappropriate use and theft.

Confidential Information should only be accessed, disclosed, transmitted, used, stored or disposed of with care and for appropriate business purposes and never for personal benefit or for any other inappropriate purpose. The Company will handle all personally identifiable information and sensitive personal information in a manner that complies with all applicable data protection laws.

#### What it means to you

- Handle Confidential Information, including sensitive data and personal information, according to Company Policy and applicable laws;
- Disclose Confidential Information for authorized business purposes only and consistent with Company policy;
- Discuss Confidential Information with Associates or third parties on a need-to-know basis;
- Store Confidential Information in limited-access areas;
- Require, where appropriate, that third parties sign a confidentiality agreement before disclosing Confidential Information to them;
- Safeguard and do not share passwords and access codes;
- Do not discuss Confidential Information with the media, or disclose it on websites, chat rooms, blogs or other non-Company related or public forums without authorization from the Corporate Communications and/or Legal Departments;
- Do not to make unauthorized copies of copyrighted materials or unlawfully use the property or information of others. Consult with the Legal Department prior to using materials protected by copyright, trademark or patent to avoid unlawful use; and
- Remember that your obligation to protect Confidential Information applies even if you stop working at Foundever.

## 5. We use social media responsibly and carefully

We recognize the power and reach of social media and how these channels can support the business goals of Foundever. We encourage a responsible and careful use of social media platforms. When an Associate communicates through social media, his or her behavior and opinions reflect on the Company.

If you publish or post information through social media regarding any aspect of the Company and its business, you must make it clear that your opinions are your own and do not represent the Company's opinions or positions.

Associates must not disclose Confidential Information, including the names of clients and business partners, without proper authorization. Associates should use their best judgment when deciding whether content is appropriate to publish and may consult the Corporate Communications Department prior to publication when they have a question.

These recommendations also apply to the use of our internal communication and productivity tool, which is open only to Foundever Associates and is intended to provide timely non-confidential Company-specific communications to our Associates.

#### What it means to you

- When posting on social media, ensure you speak on your own behalf;
- Do not make statements that you know to be false;
- Think carefully about content you share or publish and pay special attention to privileged and confidential information, intellectual property and personal data protection;
- Do not use Foundever client names and do not speak on their behalf if you don't have permission to do so;
- If you write about our competition, be fair and polite. Stick to the facts and make sure you have appropriate permissions; and
- If you are unsure about any particular posting, please consult the Corporate Communications Department for guidance.

## 6. We protect and preserve Company assets from misuse and waste

Associates of Foundever and third parties acting on the Company's behalf must protect and ensure proper use of Foundever's property including Company funds, information, logos, trademarks, intellectual property, facilities, office supplies, equipment, computers, networks, software, telephone and internet services, voicemail and email.

Foundever and its clients' resources should only be used for lawful business purposes and must not be used for fraudulent or other inappropriate purposes or for personal gain. Company assets should be used and maintained with care and guarded against waste and abuse.

#### What it means to you

- Use computer and communication resources in accordance with all Foundever policies, including those that relate to harassment, privacy and data security;
- Do not use Foundever resources in a way that is unlawful, disruptive, or offensive to others;
- All computing and communications resources at Foundever are the property of Foundever and data from those resources may be inspected, monitored, collected or disclosed by Foundever in accordance with applicable law; and
- Foundever licenses the use of computer software from third parties. Do not make, acquire or use unauthorized copies of such software.

## 7. We protect internationally proclaimed Human Rights

Foundever is committed to ensuring our Associates' human rights and dignity through thoughtful, responsible business decisions and rigorous application of the laws that protect those rights. Foundever's position on human rights is compatible with the United Nations Universal Declaration of Human Rights, the core conventions of the International Labor Organization and the United Nations Global Compact.



Foundever does not condone the use of child or forced labor. Human trafficking and forced, debt bonded, indentured and slave labor are unacceptable, and we are committed to preventing these practices in our operations and supply chain. Foundever prohibits harassment and harsh or inhumane treatment, including corporal punishment or the threat of such punishment.

We uphold Associate rights to freely chosen employment and the right to join or refrain from joining worker associations.

#### What it means to you

- Help us in creating a work environment where human rights are understood and respected; and
- Speak up if you become aware of any action that may conflict with accepted human rights standards, including from our suppliers and their employees or contractors.

## 8. We respect our community and the environment

Foundever strives to be a good citizen of the communities in which it does business and actively works to improve the quality of life of our Associates throughout the world.

Foundever believes in being a responsible, environmentally aware company, minimizing, wherever possible, the impact of our business on the environment and natural resources. Our sustainability programs help us reduce our environmental impact by reducing waste and engaging in responsible recycling. All Associates are expected to be respectful of the communities and environment within which we operate, safeguarding the health and safety of fellow Associates and the public.

#### What it means to you

- Conduct business in an environmentally responsible manner;
- Make use of resources, such as electricity, water and paper wisely; and  
Make proper inquiries into the background, integrity and responsibility of all companies performing disposal or other environmentally sensitive services for Foundever.

## OUR BUSINESS RELATIONSHIPS

Our business relationships are based on trust and integrity.

## 9. We compete fairly in business

Foundever believes in fair trade and competition. It is Foundever's policy to sell our services fairly, based on our reputation and performance. We should not make defamatory comments about the services of competitors or unlawfully use the confidential or proprietary information of others.

Further, Foundever recognizes the importance of compliance with antitrust laws. We should not share pricing, business terms, or marketing plans with competitors and should be cautious about discussing business terms outside the Company.

#### What it means to you

- Consult with the Legal Department before you communicate with a competitor regarding business issues, attend external meetings where competitively sensitive topics may be discussed or enter into any joint ventures or join any trade associations or standards-setting bodies;
- Do not agree with competitors to allocate or restrict customers, suppliers, markets, products, purchases, services or sales territories. Don't even discuss these kinds of matters with a competitor; and
- Do not agree with competitors to set prices or price-related terms or conditions.

## 10. We avoid conflicts of interest

Foundever strives to avoid matters and situations that appear to present conflicts of interest that may cast doubt on the fairness and integrity of our business processes. Associates have a duty of loyalty to the Company and should not engage in any activity that is in conflict with Foundever's interests and are expected to make business decisions based on sound business judgment that is not motivated by personal gain or interest.

#### What it means to you

- You are responsible for disclosing to Human Resources or the Legal Department any personal investment, business or other relationship that creates an actual or appearance of a conflict of interest between you and Foundever;
- You may not have an ownership interest or serve as director, officer or employee of a competitor of Foundever and may not participate in any activity that enhances a competitor's position in the market;
- You may not serve as director, officer or employee of clients or suppliers; and
- You must immediately disclose to Human Resources or the Legal Department the possibility of doing business or working with a family member, a close friend or an individual with whom you have a romantic involvement and avoid the appearance of preferential treatment.

## 11. We do not engage in insider trading

Associates may not use confidential information for personal benefit or trade securities, or tip others to trade securities of Foundever or other companies, on the basis of material information before it is made publicly available to ordinary investors through appropriate media. Material information may include news about acquisitions, investments, new business relationships, financial results, important management changes and other information that has the potential to affect the price of securities of Foundever or another company.

#### What it means to you

- Do not trade in Foundever securities or the securities of any other company (including Foundever business partners or clients) when you possess material non-public information;

- Be aware that insider trading can result in criminal penalties, civil penalties and/or disciplinary action, including termination; and
- If you have questions about securities trading or insider information, contact the Legal Department.

## 12. We do not accept courtesies that influence or appear to influence our business decisions

It is sometimes customary to exchange with third parties business courtesies, such as gifts, meals, recreation, discounts, promotional items, etc. Associates must exercise good judgment in giving or receiving such gifts or entertainment.

Hospitality, gifts or entertainment should enhance professional relationships and overall goodwill and should not appear to compromise integrity. Associates should not solicit clients, suppliers or other business contacts for gifts, entertainment or hospitality and may only accept reasonable non-cash gifts or entertainment that do not influence or appear to influence objectivity or independence and that is in accordance with local requirements. Regular gifts from a supplier or a supplier representative are not acceptable.

Associates should consult with Human Resources or the Legal Department if clarification of any of the foregoing requirements is needed in particular circumstances.

### What it means to you

Do not offer or accept a business courtesy with a client, supplier or business partner when the courtesy:

- Is intended to influence a particular decision or create a reciprocal obligation and not for the purpose of promoting goodwill;
- Is not of customary value, as determined by Foundever and industry practices; and
- Is not customary in the country where the exchange takes place and/or is in violation of any laws, regulations or policies.

## 13. We do not engage in bribery or corruption

Foundever prohibits corruption of government officials and the payments of bribes or kickbacks of any kind, whether in dealings with public officials or individuals in the private sector.

As a company with global operations, many anti-bribery and corruption laws apply to our business, such as the U.S. Foreign Corrupt Practices Act (“FCPA”), French Sapin II Law and the UK Bribery Act (“UKBA”).

Foundever Associates or anyone acting on behalf of Foundever may not pay or give anything of value, directly or indirectly, to any employee or official of a foreign government, foreign political party, candidate for political office, Foundever client, vendor or other business partner to obtain or retain business (including non-government business) or obtain an improper business advantage or for other purposes prohibited by law, even when “facilitating payments” are allowed by the applicable law.

Foundever also must comply with certain trade and financial transaction restrictions, which prohibit dealings that could aid terrorists or organizations that support terrorists, and ensure that transactions are not used for money laundering.

#### What it means to you

- You should not offer or make any corrupt payment intended for influencing any act or decision of an entity with which the recipient is associated or for inducing the recipient to use the recipient's influence to improperly affect or influence any act or decision;
- Keep in mind that prohibited conduct can include paying for meals or entertainment and making gifts;
- Do not conduct business with parties listed on governmental trade exclusion lists; and
- If you are responsible for hiring or managing partners or other third parties to act on Foundever's behalf, exercise due diligence to ensure they are not engaged in corrupt activities and are conducting Foundever business in accordance with our anticorruption policies.

## OUR RESPONSIBILITY

We all have the responsibility to ensure our Company's compliance with the highest ethical standards.

### 14. Seeking Guidance

Associates are expected to take appropriate action to address any situation that may conflict with this Code or other Company policy.

If you have questions regarding any of the content discussed in this Code, or if you are in doubt about the best course of action in a particular situation, please seek guidance from your local management, Human Resources or the Legal Department.

### 15. Reporting known or suspected violations

Associates have a responsibility to prevent actions that may damage Foundever's reputation and business, and to avoid complicity in any human rights abuses. Associates should disclose any activity that may have the appearance of being unethical and also report behaviors, known or suspected, that involve fraud, dishonest acts, misappropriation of Company property, misuse of confidential information or financial transactions, unauthorized destruction of property or records, or other violations of the laws or this Code.

If we observe things that fall short of those standards, we encourage people to raise concerns without fear. Foundever respects the confidentiality and protection of 'whistleblowers' under applicable law and strictly prohibits retaliation against any person for making a report in good faith or cooperating in an investigation.

If you want to seek guidance and report known or suspected violations, use any of these channels:

Management, Human Resources and Legal Department

Actual or potential violations of this Code or applicable law or questionable conducts may be reported to an Associate's direct supervisor, another member of the management team, Human Resources or the Legal Department.

#### EthicsPoint

You may also report ethical, compliance and legal concerns via the Foundever ethics hotline:

- Website: [www.ethicspoint.com](http://www.ethicspoint.com) (answered by an independent company and available 24 hours, every day);
- Local toll-free numbers may be found at the EthicsPoint website.

Reports may be submitted anonymously where permitted by law.

## 16. Investigating suspected violations

All reported issues will be promptly investigated and treated confidentially. Associates must cooperate fully with investigations and promptly comply with all requests for information or documents.

Associates should not alter or destroy documents or records in response to an internal or external investigation or other legal request.

## 17. Discipline for violations

All Associates are required to comply with this Code. Subject to applicable law, failure to comply with this Code may result in disciplinary action, up to and including discharge from employment.

In conducting disciplinary actions, Foundever treats all personnel with dignity and respect. Foundever does not engage in or tolerate the use of corporal punishment, mental or physical coercion, or the verbal abuse of Associates.

## 18. Changes to or waivers of the Code

Changes to or waivers of obligations under this Code for any Associate may be made only by the Board of Directors of Foundever, and will be promptly disclosed if and as required by law.

Foundever reserves the right to amend this Code at its discretion. The standards and policies discussed in this Code may be amended from time to time and Associates should access the Foundever Code of Conduct and Ethics posted at [www.Foundever.com](http://www.Foundever.com) for the most current version.

## **19. Compliance with laws**

The provisions in this Code are intended to comply with applicable laws and regulations in all locations where Foundever does business. In the event of a conflict between a provision of this Code and applicable law in your area, applicable law shall control.

## Document Control Page

### 1. Document Identification

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### 2. Referenced Documents

N.A.

### 3. History

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5.	March 2023	Corinne Suné	Annual Review, rebranded.
5.1.	September 2024	Corinne Suné	Annual review. Rebranded. Renumbered.

Foundever attaches particular importance to the appropriate protection of the information assets of Foundever and those of its clients (that it is responsible for) in terms of people, processes and systems. Foundever requires that all Foundever associates and third party suppliers become familiar with, support and comply with the appropriate parts of this policy. An organizational infrastructure has been established and is empowered to ensure that this policy is appropriately and successfully deployed and supported across all Foundever's operations.



