

Code of conduct for Sidetrade's Suppliers

At Sidetrade, we are committed to conducting our business with transparency, integrity and fairness, while complying with all applicable laws in the countries where we operate.

In line with this commitment, **we expect our Suppliers to adhere to the principles outlined in this Code of conduct, reflecting our dedication to transparency, integrity and fairness.**

"The development of our solutions is guided by an impact-driven approach, aiming to minimize negative externalities on society and our planet while maximizing positive effects for our clients. To sustain this approach, we have structured our corporate social responsibility commitments around four pillars: reducing our carbon footprint, supporting innovation and talent diversity, digital responsibility, and governance based on trust and ethical business practices. These principles must be shared by all our Suppliers to create a sustainable environment. As partners, we are collectively responsible for maintaining ethical and environmental standards in every aspect of our business interactions. Therefore, we expect our Suppliers to adhere to the principles outlined in our Code of conduct, just as we are fully committed to them.

Thank you for your commitment to respecting this Code of conduct. Together, we can create an ethical and sustainable working environment for everyone."

– Sidetrade CEO, Olivier Novasque

Scope of application

This Code of conduct applies to all suppliers with whom Sidetrade works, including subcontractors, consultants, vendors, service providers, and other business partners, as well as their employees, representatives, advisors, and subcontractors (hereinafter referred to as "Suppliers").

Sidetrade expects its Suppliers to be fully aware of the principles of this Code of conduct, to understand them, and to implement appropriate processes to comply with them in all regions where they operate.

Requirements & responsibility regarding human rights and working conditions

Sidetrade's Suppliers agree to:

- ✓ Respect the principles of the Universal Declaration of Human Rights, conventions of the International Labour Organization (ILO), and the United Nations Global Compact.
- ✓ Ensure they do not become complicit in human rights violations.
- ✓ Respect freedom of association and the right to collective bargaining.
- ✓ Contribute to the elimination of forced labor and child labor.
- ✓ Contribute to the elimination of employment and occupational discrimination.
- ✓ Adopt a precautionary approach to environmental issues and promote responsible practices.

Requirements & responsibility regarding compliance with laws and regulations

Sidetrade's Suppliers agree to:

- ✓ Respect all laws regarding competition, export control, and economic sanctions.
- ✓ Comply with anti-money laundering and counter-terrorism financing laws.
- ✓ Inform Sidetrade of any criminal or civil proceedings.
- ✓ Ensure the compliance of their own Suppliers and subcontractors with all applicable laws and regulations in the countries where they operate.

Requirements & responsibility regarding diversity and inclusion

Sidetrade expects its Suppliers to treat their employees fairly, without discrimination, and to encourage an inclusive work environment.

Requirements & responsibility regarding environmental protection

Sidetrade expects its Suppliers to comply with applicable environmental regulations. Sidetrade also encourages them to measure their carbon footprint and minimize their ecological impact, focusing on natural resource management, waste treatment, air, water, and soil pollution prevention, as well as greenhouse gas emissions reduction throughout the value chain.

Requirements & Responsibility Regarding Business Ethics

Fight against corruption

Sidetrade's Suppliers must comply with anti-corruption laws, including the Sapin II law, the US Foreign Corrupt Practices Act, and the UK Bribery Act 2010, and establish procedures to ensure that their employees and subcontractors comply with these laws and regulations.

Sidetrade's Suppliers do not offer, promise, authorize, give, request, or accept gifts, loans, commissions, rewards, or any other benefits to or from any person as an incentive: to commit dishonest, illegal acts, or breaches of trust; to obtain, prevent, or influence business; or to ensure any other inappropriate benefit.

Prevention and management of conflicts of interest

Sidetrade expects its Suppliers to exercise due diligence against all conflicts of interest situations, namely conflicts between the professional activities of the Supplier's employees and their personal interests or those of their close associates. Suppliers must implement policies to prevent all conflicts of interest or situations likely to lead to a potential conflict of interest, including policies allowing employees facing such a situation (real or potential) to report it to their superior.

Requirements & responsibility regarding confidentiality and information protection

Sidetrade's Suppliers agree to:

- ✓ Process all information obtained in the course of their business relationship with Sidetrade in a secure manner and in accordance with applicable laws and regulations.
- ✓ Comply with personal data protection laws and ensure that any collection, processing and storage of personal data is carried out in a lawful and transparent manner, informing data subjects of their rights and obtaining their informed consent where necessary.
- ✓ Implement appropriate security measures to protect information obtained in the course of doing business with Sidetrade from loss, disclosure, unauthorized access, destruction or alteration. Including the use of information security technologies, access management policies and employee training on information security practices.
- ✓ Limit access to information obtained in the context of the commercial relationship with Sidetrade to employees and agents of the Supplier who need this information to fulfill their contractual obligations, informing them of the confidential nature of the information and the obligations associated with its protection.
- ✓ Inform Sidetrade as soon as possible of any breach of information security and cooperate fully in remedying the situation.

Compliance verification

Sidetrade's Suppliers agree to:

- ✓ Promote a culture of transparency, including encouraging their employees to express any legal or ethical concerns.
- ✓ Improve or correct any identified deficiencies, whether committed by their own employees, subcontractors, or Suppliers, by implementing and enforcing best practices to address any potential non-compliance cases.

In parallel, Sidetrade has established a reporting mechanism covering corruption, influence peddling, accounting offenses and fraud, as well as serious violations of the environment, human rights, fundamental freedoms, health, and safety.

The reporting tool is available online at: [WhistleB, Whistleblowing Centre.](#)



Sidetrade reserves the right to verify its Suppliers' compliance with this Code of conduct. Suppliers must promptly and comprehensively respond to any request for information, in accordance with the applicable contractual provisions. This process is essential for Sidetrade to fulfill its obligations of monitoring, reporting and verifying its supply chain.

In case of non-compliance with this Code of conduct, Sidetrade reserves the right to review business relationships and impose corrective measures.

The adherence of Sidetrade's Suppliers to this Code of conduct is crucial to ensure a strong partnership and create a more ethical and sustainable future for all.