



# Code of conduct

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## PREAMBLE

At Flowbird, we all share a mission: to deliver high quality software, services and products to customers. As a global leader, we challenge ourselves, we constantly innovate and we support an ethical culture to remain a trusted company and a great place to work.

### Ethics and Equality

We are transparent in our actions and accountable for them. We place ethics at the heart of our business and we expect our partners to do the same.

We condemn inappropriate or discriminatory behaviours, child labour and modern slavery. We act with integrity and we value Flowbird's reputation above everything.

Each individual contributes to our collective success. We promote equality and diversity of people, of mindset and of vision. Flowbird's multiculturalism is a strength.

### Protecting the environment

Respect for our planet is a core principle. We strive to reduce our carbon footprint and lower the impact of our activities on the environment. We encourage green mobility through our solutions and internally, promoting public transport and sustainable mobility.

### Commitment and trust

This document summarizes fundamental requirements of Flowbird of its partners. We expect you, as a partner or third party, in your collaboration and partnership with Flowbird, to respect and apply these principles, mitigate the risk of deviation and guarantee continuous improvement.

Confidentiality and protection of Flowbird's assets are paramount in our relationship.

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## 1. GENERAL GUIDANCE

Partners must always act with integrity to ensure Flowbird's reliability of its supply chain allowing Flowbird to be trusted by its customers and business partners.

We are all responsible for behaving ethically and this code of conduct contains guidance to help us do so. Partners must be familiar with this code of conduct and apply it. The principles contained in this code of conduct are essential ingredients of the way we do business, regardless of who the partners are or where they work.

With Flowbird doing business worldwide, this code of conduct cannot cover all the different laws, applicable regulations and other legal requirements. It is important for partners to be familiar with any laws and local customs. First and foremost, partners

must comply with all legal requirements. Where there is a difference between a legal requirement and our code of conduct (hereafter the "Code of conduct"), partners shall always apply the most stringent standard. Moreover, since it is not possible for this document to cover every situation that may arise, partners must be prepared to exercise good judgment and common sense in deciding the right actions to take in accordance with the present code of conduct

Partners undertake to follow the present Code of Conduct and all related applicable regulation and law, which cannot be replaced by the present Code of Conduct.

Partners shall adopt the same or similarly high standards of ethical behaviour with their own partners and business partners.



## 2. SOCIAL RESPONSIBILITY

### 2.1. Relationship with Employees

Partners must treat all employees fairly, with respect and courtesy. Partners must not abuse or harass their employees, business partners, customers, or any person they work with.

Partners are committed to promoting and maintaining a culture of respect and equal opportunities.

Partners shall ensure their employees work in a respectful environment, meaning that any form of unfair or illegal discrimination shall not be tolerated. Partners undertake not to allow age, colour, gender, disability, ethnic origin, marital status, nationality, religion, beliefs, sexual orientation or any other discrimination to be a factor in hiring people and/or in decisions that relate either directly or indirectly to the career management of any of their employees.

### 2.2. Health, safety and security

Partners must conduct all their operations and decisions in compliance with applicable health and safety laws and regulations.

It is Flowbird's first priority that everyone is kept safe. Under all circumstances this supersedes and takes priority over any commercial or schedule considerations.

Partners commit to take all reasonable and practical steps to ensure that the premises where their employees work are secured and provide a zero harm working environment. Partners undertake that products and services supplied to Flowbird are safe and are provided in a secured manner. Amongst other things, partners

ensure they have a strict prevention of addictions policy.

### 2.3. Environment

Flowbird is committed to addressing its environmental impact and to seeking opportunities to improve our performances. Flowbird takes steps to identify, prioritize and manage our environmental risks - both direct (e.g. consumption and disposal of resources within its operations) and indirect (e.g. those arising through its supply chain or through the provision of financial services to other businesses or projects having material environmental impacts).

Partners will have systems in place to ensure the safe handling, movement, storage, recycling, reuse and management of waste, air emissions and wastewater discharges. Any activities having the potential to adversely impact human or environmental health will be appropriately managed, measured, controlled and handled prior to release of any substance into the environment.

Partners will have systems in place to prevent or mitigate accidental spills and releases into the environment.

If ways to reduce our environmental impacts are identified by partners, they undertake to inform Flowbird's Quality department, which strives to continually work in this area.

### 2.4. Community relations

We want to make a positive difference with local communities wherever we do business.

Partners have to hold themselves to the highest ethical standards and to behave in ways which earn the trust of the communities in which they operate by, for instance, involving themselves in local community improvement projects.

## 2.5. Human Rights

Respecting human rights is a key requirement for Flowbird, as we work in varied, often complex environments.

Partners undertake to comply with the highest existing standards and all applicable law and regulation related to human rights. Partners must also implement effective, credible and independent monitoring of their operations to ensure there is no complicity with human rights abuses.

## 2.6. Child labour

Flowbird does not tolerate child labour in its supply chain. Partners undertake to avoid any sort of child labour in their business operations, consistent with the ILO's<sup>1</sup> (International Labour Organization) core labour standards and the United Nations Global Compact principles.

## 2.7. Modern Slavery and human trafficking

Flowbird does not tolerate any form of slavery or forced labour. Partners must not use or tolerate any form of slavery or forced labour. Modern slavery is a crime and a violation of fundamental human rights. Partners are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in their own business or in any of their supply chains.

Partners also commit themselves to ensuring there is transparency in their own business and in their approach to tackling modern slavery throughout their supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. Partners, as part of their contracting processes, shall include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our partners will hold their own business partners to the same standards.

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<sup>1</sup> Minimum Age Convention, 1973 ; (No. 138);  
Worst Forms of Child Labour Convention, 1999, (No. 182)





## 3. ETHICS

To meet social responsibilities, partners are expected to conduct their business in an ethical manner and to act with integrity.

### 3.1. Business Integrity

Partners shall not offer Flowbird's employees gifts or benefits that could affect or appear to affect, impartial decision-making by Flowbird's employees. Offering anything of value as a bribe, whether cash or non-cash items, is prohibited. Partners will comply with the full requirements of the highest standard, including applicable law and regulation<sup>2</sup>.

Partners are expected to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest. Conflicts of interest are situations in which competing interests may impair the ability to make objective and unbiased business decisions. Partners are expected to provide notification to all affected parties in the event that an actual or potential conflict of interest arises.

Partners are expected to exert reasonable due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of intermediaries such as agents or consultants.

### 3.2. Fair Competition

Partners must comply with anti-corruption laws, directives and regulations that govern operations in the countries in which they do business.

Partners are required to refrain from offering or making any improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons.

In any case, partners must not fix prices or rig bids with their competitors. They must not exchange current, recent, or future pricing information with competitors. Partners must refrain from participating in a cartel.

### 3.3. International sanctions and illicit trade

Partners must comply with international sanctions and local laws aimed at detecting and preventing terrorism and other criminal activities. Therefore, we request our partners to establish mechanisms that provide checks and safeguards at key steps in the business processes when dealing with customers and business partners.

### 3.4. Conflict mineral

Partners are expected to ensure products supplied to Flowbird do not contain metals derived from minerals or their derivatives originated from conflict regions that directly or indirectly finance or benefit armed groups.

### 3.5. Privacy & Intellectual Property

Partners will safeguard and only make appropriate use of confidential information and ensure that all employees' and business partners' privacy and valid intellectual property rights are protected.

<sup>2</sup> e.g. FCPA, UK Bribery Act and the french law ref. n°2016-1691

Partners and their personnel must not use any material or non-publicly disclosed information obtained in the course of their business relationship with Flowbird as the basis for trading or for enabling others to trade in the stock or securities of any company.

### **3.6. Cybersecurity**

Partners must take all appropriate technical and organisational measures to protect our data from accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access. These measures shall ensure a level of security appropriate to the risks represented by the processing and the nature of the data to be protected, in regard to the state of the art and the cost of their implementation.






## 4. IDENTIFICATIONS OF CONCERNS

Partners will provide means for their employees to report concerns or potentially unlawful activities in the workplace.

Any report should be treated in a confidential manner. Partners will investigate such reports and take corrective action if needed.

In any case, any identified or potential misconduct compared to this Code of Conduct shall be raised to Flowbird through the following identification of concerns tool

 over the Internet :  
<http://flowbird.ethicspoint.com/>