

SUPPLIER
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 and suppliers to do the same.

We refuse inappropriate or discriminatory behaviors, 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 suppliers.

We expect you, as a partner, supplier 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.

Élodie Pommepuy - *General Counsel & ESG* and **Frédéric Beylier** - *Flowbird CEO*





1. GENERAL GUIDANCE

Supplier 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 this. Supplier 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 suppliers 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 Supplier to be familiar with any laws and local customs that apply to where he works. First and foremost, Supplier

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

Supplier undertakes to follow the present Code of Conduct and all related applicable regulation and law which cannot be replaced by the present Code of Conduct.

Supplier shall adopt the same or similarly high standards of ethical behaviour with their own suppliers and business partner.



2. SOCIAL RESPONSIBILITY

2.1. Relationship with Employees

Supplier must treat all employees fairly and with respect and courtesy. The supplier must not inflict the abuse or harassment against its employees, its suppliers, its customers, or any person with whom he works.

Supplier is committed to promoting and maintaining a culture of respect and equal opportunity.

Supplier shall ensure its employees to work in a respectful environment meaning that any form of unfair or illegal discrimination shall not be tolerated. Supplier undertakes 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 its employees.

2.2. Health, safety and security

Supplier must conduct all its operation and decision 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.

Supplier commits to take all reasonable and practical steps to ensure that the premises where its employees work are secured and provide a zero harm working environment. Supplier undertakes that products and services supplied to Flowbird are safe and are provided in a secured manner. Amongst other things, supplier ensures having in place a strict policy regarding prevention of addictions.

2.3. Environment

Flowbird is committed to addressing its environmental impact and to seeking opportunities to improve our performance. FLOWbird takes steps to identify, prioritise 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 which have material environmental impacts).

Supplier will have systems in place to ensure the safe handling, movement, storage, recycling, reuse and management of waste, air emissions and wastewater discharges. Any of these activities that have 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.

Supplier 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 the Supplier, Supplier undertakes to inform the Quality department that 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.

Supplier has to hold himself to the highest ethical standards and to behave in ways which earn the trust of the communities in which he operates by, for instance, involving itself in local community improvement projects.

2.5. Human Rights

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

Supplier undertakes to comply with highest existing standards and moreover all applicable law and regulation related to human rights. Supplier must also implement effective, credible and independent monitoring of its 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. Supplier undertakes to avoid any sort of child labour in their business operations consistent with the ILO's¹ (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. Supplier must not use or tolerate any form of slavery or forced labour. Modern slavery is a crime and a violation of fundamental human rights. Supplier is committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in his own business or in any of his supply chains.

Supplier also commits itself to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. Supplier as part of its 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 suppliers will hold their own suppliers to the same high standards.

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



3. ETHICS

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

3.1. Business Integrity

Supplier shall not offer to Flowbird's employee gift 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. Supplier will comply with the full requirements of highest standard including applicable law and regulation².

Supplier is 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. Supplier is expected to provide notification to all affected parties in the event that an actual or potential conflict of interest arises.

Supplier is 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

Supplier must comply with the anti-corruption laws, directives and regulations that govern operations in the countries in which they do business. Supplier is 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, Supplier must not fix prices or rig bids with their competitors. It must not exchange current, recent, or future pricing information with competitors. Supplier must refrain from participating in a cartel.

3.3. International sanctions and illicit trade

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

3.4. Conflict mineral

Supplier is expected to ensure that 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

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

Supplier and its 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.

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

3.6. Cybersecurity

Supplier must take 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, having regard to the state of the art and the cost of their implementation.



4. IDENTIFICATIONS OF CONCERNS

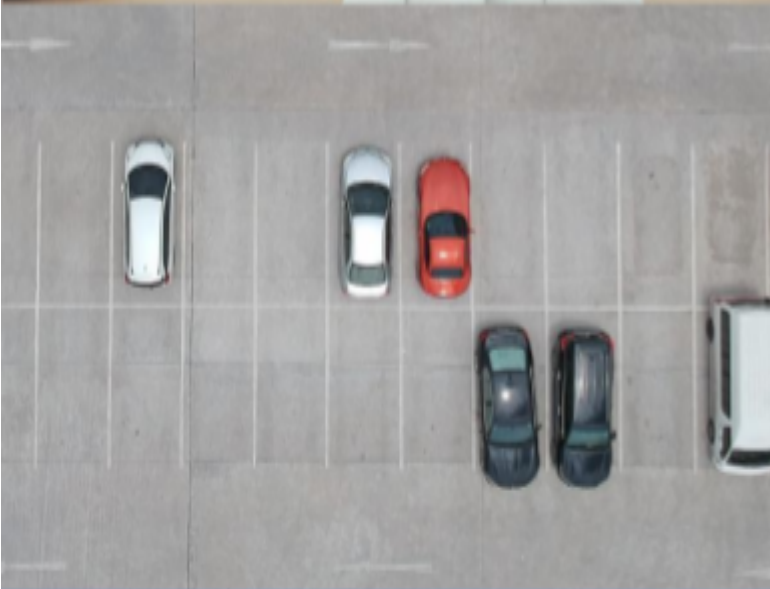
Supplier will provide means for their employees to report concerns or potentially unlawful activities in the workplace.

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

In any case, any identified or potential misconduct compare to this Code of Conduct

shall be raised to Flowbird through the following identification of concerns tool

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



Registered office
2 Ter rue du château
92200 Neuilly sur Seine

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<https://www.flowbird.group/>

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