



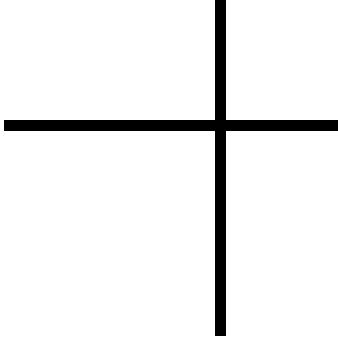
CODE OF CONDUCT

 anywr

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INTRODUCTION

Anywr defines itself first and foremost as a human and responsible company that is committed to the highest standards of safety, environment and integrity.

In order to further its commitment, Anywr has become a mission-led company, in July 2021.

Our purpose is the following:

**"BUILDING TOGETHER A MORE RESPONSIBLE, OPEN AND FLUID
PROFESSIONAL WORLD"**

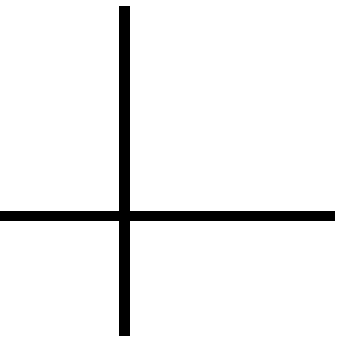
OUR GOALS

VALUES

Anywr today operates in a dozen countries with more than 450 corporate partners, and it was founded in 2012 on the following values: Audacity, Enjoyment, Commitment and Diversity.

MISSION

To support life projects and prove that talent is borderless. Our growth is based above all on the respect of human values that is the core of our commitment.



FOREWORD



Olivier Desurmont,
Director and co-founder of
Anywr

"Ethics must be the first value supported by Anywr.

Our aspiration, as a mission-led company but also as an employer, is to be an example in terms of ethics, probity and transparency.

Our ethical charter must guide our daily work and allow us to question our choices, regardless of the country we are in or the position we hold.

I am committed to making this code of ethics a reality in my daily work and I need every employee and partner to make it happen.

Thank you for taking notice of this charter, for applying it and for embodying it together."



APPLICABLE LAW AND REGULATION

INTERNATIONAL REGULATION

- Universal Declaration of Human Rights
- OECD Convention
- ILO Convention
- United Nations Convention

FRENCH LAWS

- The 2001 new economic regulations law (called the "NRE" law)
- The 2015 law for energy transition
- The 2019 law related to the growth and transformation of company (called the "PACTE" law)

REGULATIONS IN PARTNER COUNTRIES

Anywr is operating in many countries and continents, each country having distinct cultures and laws.

Thus, compliance with the laws and regulations of the countries in which Anywr operates is essential.

CODE OF CONDUCT TERMS



N° 01 - The reference for employees and stakeholders

The Code of Conduct is the reference document for all our employees as well as all our stakeholders: customers, corporate officers, partners, suppliers, host countries, shareholders.... throughout the world. Our stakeholders are therefore required to apply standards equivalent to ours, particularly with regard to their employees.

In order to allow as many employees as possible to read the Code of Conduct, it is currently available in English. The French version is the reference document in France and the English version is the reference document outside France.



N° 02 - Anywr's commitments

It is commonly accepted that when it comes to ethics, there are still unclear situations. This Code is intended to set Anywr's standards, sometimes beyond the legal framework, to respond to these situations as best as possible.

Amongst our employees, the role of managers is paramount:

- They must ensure that their team members have a good understanding of the Code of Conduct.
- Their role is to create a climate of trust to enable employees to share their concerns in complete serenity.
- Finally, managers, as true ambassadors, must adopt an exemplary conduct that embodies our values.



N° 03 - Use of the Code

When you face a decision which is difficult to make, ask yourself whether this decision you want to make is in line with this Code of Conduct and the laws in force. Also ask yourself what the impact of the decision will be and whether you will be able to justify it.

If the answer to any of the latter questions is no, or if there is any doubt, the golden rule is to contact the relevant person(s) in the area: the ethics committee together with the legal department are there to advise you in some cases.

This Code refers to the company's internal rules. In case of non-compliance, the disciplinary sanctions set out in the internal rules are applicable.



ETHICS COMMITTEE

Anywr has also set up an ethics committee to ensure compliance with this Code of Conduct. The missions of the ethics committee are manifold:

- Submit recommendations in the areas of development with regard to the values of the company and the ethical principles adopted by the company.
- Ensure the dissemination and good understanding of the ethical principles and rules of conduct by the entire Group
- Review and update the Group's risk map
- Develop the Group's compliance program

The ethics committee meets once every two months. It is composed of 6 permanent members. The ethics committee ensures that the provisions of the Code are implemented and respected. It deals with complaints that state their ignorance as well as their limits/shortcomings. Finally, the ethics committee ensures that the provisions of the Code of Conduct are kept up to date depending on legislative and societal developments in the countries in which Anywr operates.



WHISTLEBLOWER PROTECTION



The Sapin II French law provides for a gradual system that Anywr has adopted.

Indeed, when an employee has information proving unethical and illegal behavior, there are several ways of reporting internally, either through their manager or directly to one of the members of the ethics committee.

It is also possible to send an e-mail to the address below and to request anonymity:

lanceur.alerte@anywr-group.com

When an alert is made, Anywr undertakes to investigate the allegation while respecting the confidentiality of the alert.

The law issued on March 21, 2022, known as the "Waserman law", has extended and strengthened the protection granted to whistleblowers as enshrined in the Sapin II law. This protection applies to "natural persons who report or disclose, without direct financial compensation and in good faith, information related to a crime, an offence, a threat or a harm to the public interest, (...)".

When, as a result of his or her reports, repressive measures are taken against the whistleblower, these are considered to be contrary to the law and they are therefore null and void. Moreover, in this specific case, the burden of proof is reversed. It is thus up to the organization, which is accused of a serious violation of the general interest, to prove that it did not take repressive measures against the whistleblower.

Anywr is committed to whistleblowers' protection, protecting them from retaliation and supporting them in their efforts.





MEETING OUR COMMITMENTS AS A COMPANY

- Selection and fair treatment of suppliers
- Fight against corruption
- Confidentiality
- Privacy and personal data

SELECTION AND FAIR TREATMENT OF SUPPLIERS

Anywrr chooses its suppliers in a transparent and impartial manner.

We respect the independence of our suppliers at all times and we are dedicated to our commitments to our stakeholders.



We shall :

- **Ensure that our suppliers are selected based on objective criteria and without favoritism.**
- **Ensure that our ethical requirements have been communicated, understood and respected by all suppliers.**
- **Protect our suppliers' data in the same way that we protect ours.**



We shall not:

- Continue to work with suppliers who do not respect our ethical principles and national and international laws.
- Start working with suppliers who do not meet legal requirements, in particular in the areas of human rights and anti-corruption.

SCENARIO 1

We are looking for a new supplier for our computers, one of them offers us a very cheap price but the second one has better quality products. In order to lower the price of the second supplier, can I reveal the prices offered by the first supplier?

It is allowed to mention the fact that a supplier has offered you a lower price, but you must not reveal the name of the supplier and the exact price of the offer.

This information has been provided as part of a pre-contractual negotiation and it is protected by the principle of confidentiality.

SCENARIO 2

I heard from a confidential source that one of our suppliers was under investigation for sexual harassment.
Should I talk about this or not?

We cannot deny or ignore this type of information. The ethics committee must be informed, and it will take this information into account and may request further information from the supplier. If necessary, an audit may be conducted.

FIGHT AGAINST CORRUPTION

The fight against corruption is an issue in which Anywr places significant importance.

It is the subject of a specific policy which is annexed to the Code of Conduct.

The main topics covered are:

GIFTS AND ENTERTAINMENT

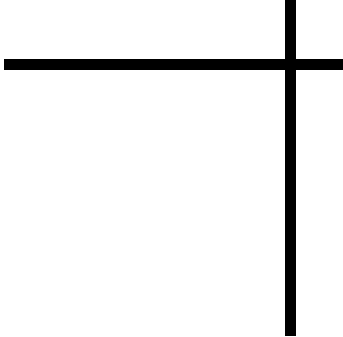
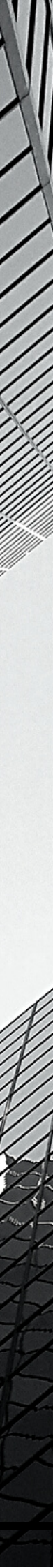
We understand that the exchange of gifts and entertainment can be part of a business relationship, but it can also lead to conflicts between personal interests and the interests of the company.

We require full transparency in this area.

CONFLICTS OF INTERESTS

According to the French Anti-Corruption Agency, a conflict of interest is "any situation of interference between the position held within a company and a personal interest, so that the interference influences or appears to influence the loyal exercise of the position on behalf of that company".

In the event of potential conflicts of interest, the rule is to immediately notify the management to allow it to have a thorough understanding of the situation.



MONEY LAUNDERING

All data contained in financial documents or in any other documents must be accurate and disclosed in a transparent manner in accordance with the law.

We must ensure that our activities are not used to fund criminal activities through questionable transactions.

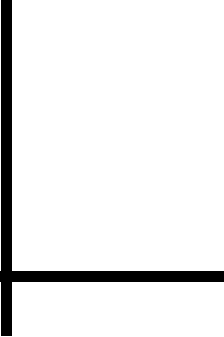
COMPETITION

There are a substantial number of competitors in the current market.

Competition law lays down very strict rules in this area, it is important to comply with such rules in order to avoid being targeted by the relevant authorities.

BRIBERY AND FACILITATION PAYMENT

Anywr has a zero-tolerance policy on bribery: it is prohibited in all countries where we operate, and it is the exact opposite of our values.



CONFIDENTIALITY

Disclosing information without Anywr's consent may harm us, our partners and our customers.

Our employees who have access to certain information, whether internal or relating to our stakeholders, must comply with Anywr's rules in this regard.



We shall :

- Do everything possible to keep confidential information safe, in particular by avoiding communication via unsecured media.
- Ask ourselves, at all times, what we are allowed to communicate or not.
- Restrain communication related to professional information to those who have a legitimate interest to have access to it.
- Comply with signed non-disclosure agreements together with contracts that require us to delete data within certain time limits.



We shall not :

- Leave media containing confidential information unattended.
- Work on confidential information in public places without taking any precautionary measures, putting the security of the data at risk.
- Disclose this confidential information within our personal circle.
- Keep copies of data at the end of your collaboration with Anywr.

SCENARIO 1

I travel a lot for my work, especially by train. I use these journeys to work on my laptop but sometimes some passengers look at my screen while I am working on confidential matters. What can I do about this?

Wherever possible, we recommend not to open sensitive files in public places such as public transport.

However, if your activity makes this necessary, you should ask IT support to provide you with a privacy filter so that no one but you can view the confidential content.

SCENARIO 2

I am a manager working on a confidential matter for an important client. The client asks me to ensure that the whole operation is treated with the utmost confidentiality. How can I ensure that my team members comply with this requirement?

Where services and/or contracts require confidentiality, you should contact the legal department so that all employees working on the project sign a non-disclosure agreement.

PRIVACY AND PERSONAL DATA

In accordance with the General Data Protection Regulation of the European Parliament, Anywr has committed to respecting the personal data of all its stakeholders.

Therefore, we only collect and store personal data when necessary for our business.



We shall :

- Ensure that individuals have given their prior consent to the collection of their data and are well informed about the use of their data by Anywr.
- Ensure the protection of this data.
- Ensure compliance to the various retention periods.
- Contact the DPO and/or the legal department in case of doubt about a situation related to the personal data process.



We shall not :

- Disclose personal data to persons who do not have a legitimate interest.
- Agree to work with subcontractors who are not in compliance with our personal data protection commitment.

SCENARIO 1

In the middle of the evening, I realized that my phone was no longer in my pocket. In addition to my personal data and apps, I have downloaded Teams and therefore have access to confidential information on my phone.
What should I do?

In the event of theft or loss of a tool containing confidential information related to Anywr or our stakeholders, the IT department and the DPO should be immediately informed at the following address: **dpo@anywr.com**

SCENARIO 2

One year ago, I applied on Anywr's website. Is my résumé still in the database and is it still accessible?

If you have not made a request for the deletion of your résumé, when such deletion is one of your rights that can be expressed via the email address **dpo@anywr.com**, your résumé will still be stored in our database for one more year. Résumés are being kept for a total period of 2 years without any request from you.

However, since February 2022, all résumés that are available to our clients are anonymized.



MEETING OUR REQUIREMENTS AS AN EMPLOYER

- Fight against irregular work
- Diversity
- Health and safety at work
- Right to disconnect
- Moral harassment
- Sexual harassment

FIGHT AGAINST IRREGULAR WORK

Anywr promotes the values of human rights and fundamental rights. As such, any irregular work situation is strictly prohibited.

This includes undeclared work, forced labour and child labour.

DIVERSITY

Diversity is one of the 4 values on which Anywr founded itself in 2012. We believe that diversity of our talents is our greatest asset. One of Anywr's goals is to facilitate employment access for people experiencing difficulty.



We shall :

- **Accept all the differences of the people we meet, without any judgement.**



We shall not :

- Discriminate against people on the basis of gender, religion, disability, age, sexual orientation or ethnic origin.

SCENARIO 1

During a meeting with a client, I noticed that my colleague made several inappropriate jokes about our client's ethnicity.

I didn't know how to react, and I no longer dare contact the client.

Any discrimination based on ethnicity, nationality or other differences is contrary to Anywr's principles.

You should immediately inform your supervisor or any other relevant person who may intervene.

SCENARIO 2

I am a young pregnant woman.

Since I announced it to my hierarchy, I have been the subject of some thoughts about my condition, and I am wondering how I will be treated when I return from maternity leave.

Professional equality between men and women is a principle enshrined in law and strongly respected at Anywr.

Employees are protected, regardless of their condition.

I must inform at least the HR department and/or the ethics committee so that measures can be taken.

HEALTH AND SECURITY AT WORK

Each of us has the right to a healthy working environment where we feel safe. Anywr is committed to helping create this environment, which depends on the actions of each one of us.



We shall :

- On a daily basis, make sure that our actions do not put ourselves or others at risk and = ensure that we know what to do in the event of an emergency.
- Communicate about occupational risk we face, including potential work overload.



We shall not :

- Ignore safety rules in the workplace.
- Consume alcohol in the workplace.

SCENARIO 1

My line manager is very stressed and tired at the moment, she refuses to take any time off. Today she even collapsed in the break room. What should I do?

You must inform human resources quickly so that they can act accordingly.

SCENARIO 2

One of my colleagues comes back from lunch drunk and spills a few files on his path. What should I do?

You must immediately inform his manager about the colleague's condition as this behavior could put the safety of the work environment or the safety of others at risk.

RIGHT TO DISCONNECT



In accordance with the French Labor Code, Anywr is committed to enforcing the right to disconnect. Each of our stakeholders has the right not to be connected to their digital tools outside working hours.



We shall :

- **Respect office hours as much as possible regarding the sending of communications in any form.**
- **Consider, as far as possible, the time difference when sending requests to people living in other countries.**
- **Raise awareness and inform employees and managers on the right to disconnect.**



We shall not :

- **Contact employees at weekends or during their holidays.**

SCENARIO

My manager keeps sending me emails or messages via Teams until 11pm every night.
What can I do about it?

I can assert my right to disconnect, which is a principle of labor law allowing a balance between personal and professional life.
I am allowed to not reply after a certain time, and to deal with the relevant e-mails during my working hours the next day.

MORAL HARASSMENT

Every individual has the right to respect as a person, together with human dignity. An insulting or humiliating behavior cannot be accepted within Anywr.



We shall :

- Demonstrate respect for our colleagues, clients, service providers and all other stakeholders in the company.
- Speak up at the first sign of any wrong behavior so that the situation does not get worse.



We shall not :

- Seek to hurt, belittle or denigrate anyone in the company, intentionally and with the aim of harming them
- Minimize the speech of the person who feels harassed
- Witness moral harassment and ignore it.

SCENARIO 1

My line manager gives me a lot of tasks to complete, and every time I hand in my work, he/she publicly humiliates me in front of my other colleagues by questioning my skills and my work. What can I do about it?

The line manager is there to motivate and stimulate teams, not to denigrate them in a totally disrespectful way and make them lose confidence in themselves.

Not only should he/she be made aware of this, but also the human resources department so that the necessary measures can be taken.

This behavior will not be tolerated within Anywr.

SCENARIO 2

My colleague has been talking to me for several weeks about the behavior of a person in his/her team that is weighing him/her down. He/she is increasingly tense and stressed but refuses to talk about it to his hierarchy. What can I do to help him?

The ethics committee should be notified. It is important to respect the anonymity of this person if desired.

However, we have to be aware of the situation in order to protect the employee.

SEXUAL HARASSMENT

Sexual harassment, whether in the form of severe pressure to perform a sexual act or in the form of repeated and unwanted sexual comments or behavior, is unacceptable at Anywr.

If such conduct occurs at work, you may be entitled to specific protection from your employer and from the authorities.



We shall :

- Be respectful of our colleagues, clients, providers or others.
- Promote the company's commitment to a place free of all forms of sexual harassment.
- Consider the sensitivity of each person to any remarks or jokes that may be wrongly perceived, especially in the professional world.



We shall not :

- Behave in a way that is inappropriate or tendentious towards anyone we work with in the course of our missions.
- Take advantage of our position towards a subordinate to exert pressure that should not take place.

SCENARIO 1

I am about to sign a contract with a major client of Anywr. The client is insistent, he makes disturbing allusions, telling me that he/she would sign faster if I agreed to have dinner with him/her and maybe more. What should I do?

The matter should be raised immediately with the hierarchy or human resources management.

Anywr does not accept that its employees may be subjected to sexual harassment, including from customers or partners.

SCENARIO 2

One of my colleagues is constantly making sexist and even gravelly jokes. This makes me feel extremely uncomfortable and I do not know how to react.

You should not hesitate to contact the human resources, who are there to resolve this type of situation and to guarantee a respectful and safe working environment.



MEETING OUR COMMITMENTS AS A RESPONSIBLE COMPANY

- Environment
- Community impact

ENVIRONMENT



As part of its mission-led company, Anywr is committed to reducing its carbon footprint over the next five years and it is therefore placing the environment at the heart of its concerns.

Anywr's commitment to environmental protection is also measured by the actions of its teams on a daily basis. A new travel policy has been in place since July 2022 with the aim of reducing travel.

From now on, it is necessary to:

- Make video conferencing your first choice
- Limit travel to specific occasions
- When travel is necessary, pick the most responsible transport: the plane should only be used when travelling abroad or if the train journey is longer than 5 hours.

In addition, every day, the mission-led company's environmental project ensures Anywr's employees' awareness and take care to meet the following environmental goals from the 2020 taxonomy regulation n°2020/852:

- climate change mitigation;
- climate change adaptation;
- transition to a circular economy;
- pollution prevention and reduction.

Finally, Anywr takes into consideration the 17 United Nations Sustainable Development Goals in its business, working towards a better and more sustainable future for all by 2030.



We shall :

- **Identify areas where it is possible to work to reduce the company's impact on the environment**
- **Contribute to initiatives developed by Anywr as part of the mission-led company**
- **Raise awareness among customers and partners on their carbon impact and accompany them towards an ecological transition**



We shall not :

- **See Anywr as a purely for-profit company**
- **Ignore the rules implemented within Anywr with the aim to protect the environment and reduce carbon impact**

SCENARIO

Since Anywr complies with the legislation in force in France regarding environmental protection, why should we be bound by additional environmental rules that Anywr has set for itself?

By becoming a mission-led company, Anywr has chosen to put the environment at the heart of its ethical commitment in order to pave the way for the companies' transformation prescribed by the PACTE law and to actively provide a positive impact for society as a whole.

COMMUNITY IMPACT

As part of its mission-led company, Anywr is also committed to contributing to the well-being of its employees, customers, and partners and to strengthening the diversity within its teams.



We shall :

- Think about the concept of general good and the optimal way for Anywr to contribute to it
- Take an active part in the actions launched by Anywr within the framework of the mission-led company
- Encourage participation in solidarity initiatives related to Anywr's business (Les Enfants du Mékong, Nos Quartiers ont du Talent...). In particular, Anywr, through its subsidiary The Map, finances tree planting in Madagascar.



We shall not :

- Engage Anywr in actions that would be inconsistent with the principles set out in this Code of Conduct.
- Forget to bring Anywr's stakeholders together to improve their well-being at work.

SCENARIO

The refugee center where I volunteer every week asks that every volunteer help recruit new volunteers and would like me to get Anywr more involved.

I know that several of my colleagues might be interested - can I talk to them directly?

If the activity in which I take part as a volunteer is consistent with the principles stated and adopted in this Code of Conduct, it is possible to discuss this with Anywr's HR team to consider the most appropriate communication on this matter.

CONTACTS



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www.anywr-group.com

Talent is borderless.

