



ARCAD
SOFTWARE

2023

Breaking Barriers...



ARCAD
SOFTWARE

Code of Conduct



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Purpose and scope of application

Purpose

This Code of Conduct sets forth a number of essential rules and provides guidelines to ensure that all of us, including those acting on behalf of Arcad Software, act with the utmost integrity and in accordance with the many laws, regulations and policies that govern us. All of our activities are based on trust; without it, our stakeholders would not work with us. Our Code of Conduct expresses our personal commitment to earning that trust every day, in every community and in all our business activities. It reflects our values through clear and simple guidance to all our employees and business partners.

Scope and applicability

The Code of Conduct establishes standards of ethical behavior for Arcad Software employees and business partners. It outlines our 3 core principles and 6 risk areas, each with a detailed explanation. It explains how compliance is a shared commitment and responsibility for all of us. The Code of Conduct applies to Arcad Software's officers, managers and employees. Arcad Software will make every effort to ensure that third parties such as suppliers, partners, and subcontractors are committed to the same values and principles embodied in this Code of Conduct.



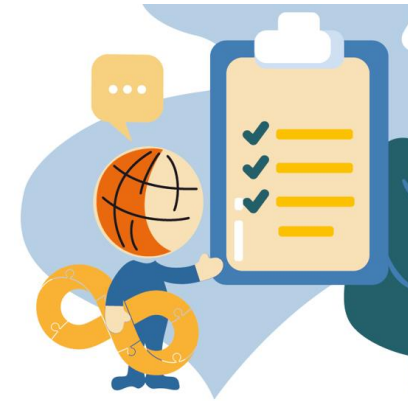
The 3 basic principles of our Code of Conduct



We respect the laws of the countries in which we operate or where we have customers.



In all our business relationships, we value a culture of integrity based on mutual respect, reciprocal trust and high ethical standards.



We are all responsible for this Code and if we become aware of any violations, we will promptly report them.

Your responsibilities

- Read, understand and follow the Code of Conduct
- Promptly report any compliance issues
- Do not hesitate to report any concerns
- Avoid any practice that could result in illegal behavior or the appearance of impropriety or damage Arcad Software's reputation.
- Provide full support to anyone reporting a compliance concern
- Cooperate fully in all compliance investigations

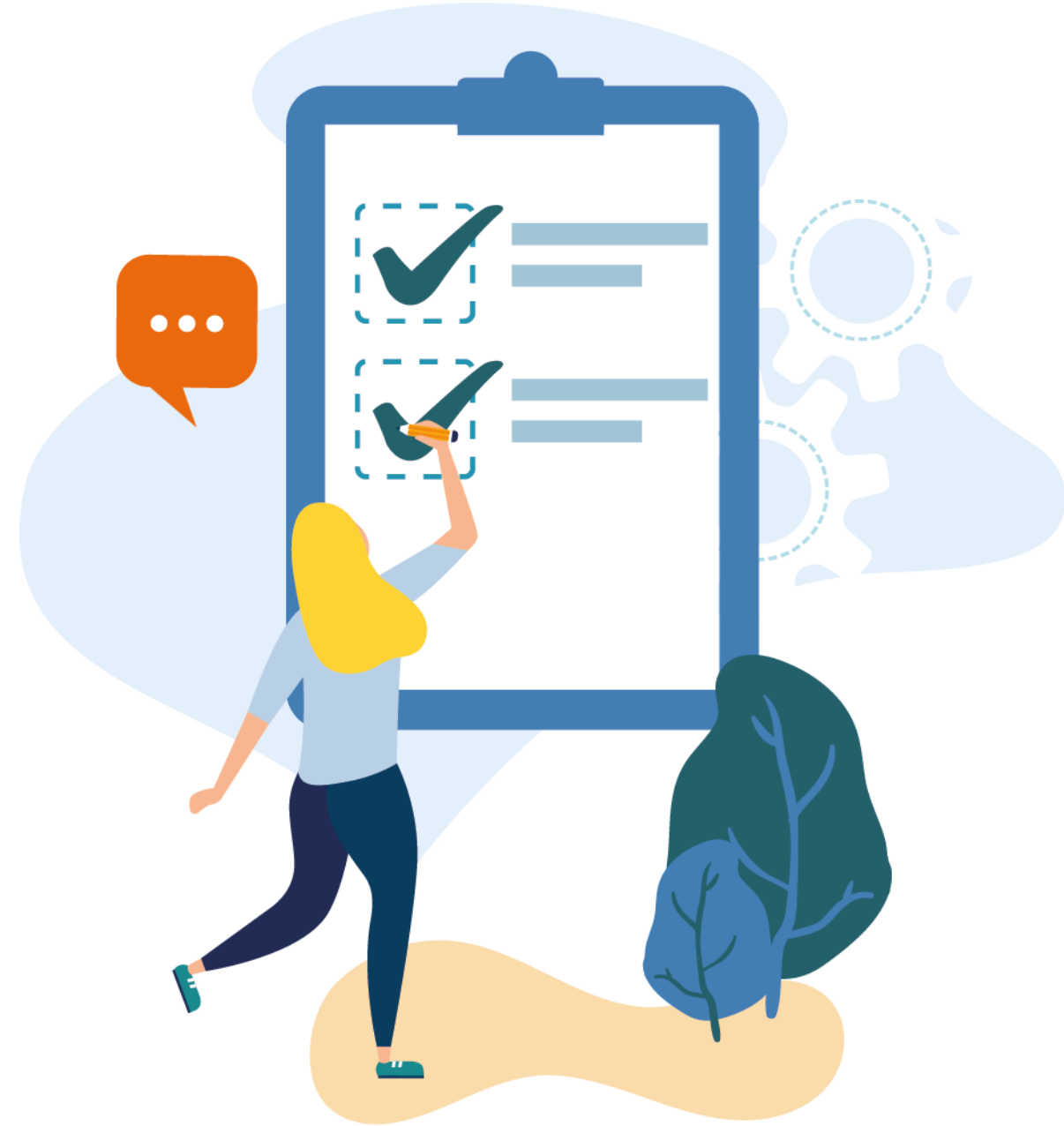
The alert process

The dysfunctions and problems observed can be reported confidentially and without risk of reprisals via different channels:

- to management: Strategycommittee@arcadsoftware.com
- the Human Resources Department: rh@arcadsoftware.com
- the Security Committee: security-committee@arcadsoftware.com



Compliance policies



Conflict of interest - professional ethics

What you need to know

A conflict of interest arises when an employee's professional or personal interests are divergent, making it difficult for him or her to perform his or her duties in an impartial manner.



Consider this scenario

My uncle holds a position of responsibility with one of our suppliers. I have the autonomy to choose the suppliers. Is this a conflict of interest?

Yes, management must be informed of this relationship and ensure that you are not involved in purchasing decisions regarding this supplier or its competitors.

Fair competition - professional ethics

What you need to know

In most countries there are antitrust or competition laws that regulate the activities of companies in the market to ensure fair competition for the benefit of consumers and market players. Compliance with competition rules and fair competition is important for our business strategy.

Consider this scenario

I have just received confidential information about a competitor's prices. I didn't ask for this information, but it could be useful to me. What should I do?

If you receive, directly or indirectly, confidential or competitively sensitive information about a competitor, do not distribute or use it. You can reply to the sender of the information that you did not request the information and emphasize our commitment to comply with competition laws.



Improper payment - professional ethics

What you need to know

We do not tolerate fraudulent or hidden payments, such as bribes or kickbacks, whether paid directly or indirectly to or by a client, government official or third party, including payments:

- Undue gifts ;
- Entertainment, gratuities, favours, gifts;
- Other inappropriate transfers of value.

We ensure financial ethics by externally auditing our accounts to combat corruption and money laundering.

Consider this scenario

I have been asked by a customer to approve a new supplier order that includes a commission on which the customer does not clearly respond. What should I do?

The commission may be a disguised kickback or fraudulent payment, if you have any doubts, speak to your manager or management.

Fair employment – professional ethics

What you need to know

Equality and respect are fundamental principles of our culture. Arcad Software promotes a diverse and inclusive work environment, based on ethical recruitment and where opportunities for success and development are based on merit.

Benefits are harmonized and pay policies are controlled. Particular attention is paid to women's rights and minorities.

Discrimination, harassment and retaliation in any form are prohibited.



Consider this scenario

A colleague is insistent with you, you reported this behavior to your manager, who did not take it seriously. What should you do?

You should inform the Human Resources department or the management of this situation. The harassment referents of the company are also a privileged channel for this type of alert.

Human rights – professional ethics

What you need to know

At Arcad Software, we do not tolerate, contribute to, or facilitate any activity that fuels conflict or violates human rights. We do not tolerate, in any context, the use of servitude, child labor, forced labor, human trafficking, or slavery in our operations in any region in which we operate or with our suppliers or subcontractors.



Consider this scenario

I have heard that one of our suppliers withholds employees' passports for "safekeeping". Is this a concern?

Yes. Employers who retain travel documents and have other unacceptable controls over employees might be committing modern slavery offenses. It is an obligation to report this to the management of the company.

Health, safety and labor conditions

What you need to know

Arcad Software provides a safe, healthy, and fair work environment by defining and following internal procedures, which meet the regulatory requirements in force notably on working hours and salary policies.



Consider this scenario

A project manager is under enormous pressure from his client to get the technical team to meet expectations quickly, but this situation, which was supposed to be a one-off, continues over time. Is this practice acceptable?

No, this situation should be handled differently so that it does not continue, for example by redefining the deadlines with the client.

Privacy

What you need to know

Arcad Software respects the privacy and maintains the highest standards of personal data protection for both employees and customers.

Appropriate security measures to protect personal data from unauthorized use or disclosure are taken and monitored.



Consider this scenario

I accidentally received a file containing personal data. Should I just close the document and ignore what I have seen?

No, the disclosure of such information, even inadvertently, requires corrective action. Inform your manager or our security committee: security-committee@arcadsoftware.com.