

WORD FROM THE DIRECTOR

Today more than ever, ethics, integrity and the fight against all forms of discrimination have become major and structuring issues for all companies. Changes in the national and international regulatory and normative framework have contributed to making these key concepts universal values that every Company must promote. This virtuous approach to making the business world more responsible for the major challenges facing society is also supported by a large part of public opinion.

In this context, EXTRA TIME intend once again to strongly reaffirm, in a broader approach, the values that have always been ours and that structure us, namely respect, trust and exemplarity. It is essential that all of our activities in a globalized world be conducted with the utmost integrity and transparency by all our employees.

The purpose of this Code of Ethics is to detail the pillars that will contribute to our success as a socially responsible Company:

- ✚ Zero tolerance, through the fight against all forms of corruption, fraud and anti-competitive practices.
- ✚ Constantly striving for the highest level of safety and security in the conduct of all our activities, both for our employees and for third parties.
- ✚ Strong commitments to environmental protection.
- ✚ The fight against all forms of discrimination, in compliance with national and international standards.

This approach is ambitious, but I am convinced that it will strengthen the reputation of EXTRA TIME, and that together we can create the conditions for sustainable and responsible growth.

Through this Code of Ethics, the Management Committee and I are setting out principles of professional conduct which must, everywhere and in all circumstances, inspire our behavior and that of our partners. We therefore expect each one of us to adhere strictly to the values set out in this Code, so that together we can contribute to the reputation of our Company in terms of ethics and integrity.

Alexandre Michel
Director

OUR PRINCIPLES

1. OPTIMAL WORKING CONDITIONS

We are particularly sensitive and attentive to the working conditions of all our employees.

We are committed to ensuring that every EXTRA TIME employee is treated fairly, and to guaranteeing his or her physical integrity and respect for all his or her fundamental rights. At the same time, we expect total reciprocal loyalty from the employee towards his colleagues, his hierarchy and/or his subordinates.

Therefore, our human resources department is committed to an approach based on the following principles of action, which are largely inspired by international standards, particularly principles 3 to 6 of the Global Compact:

- All employees, regardless of their hierarchical level, must refrain from any act of disparagement towards a colleague or subordinate ;
- Every employee must contribute daily to the respect of the commitments made in this Code of Ethics and ensure his or her own safety and that of his or her colleagues.
- Managers must treat each member of their teams fairly, in accordance with the principles set forth in this Code of Ethics ;
- EXTRA TIME is committed to fighting all forms of discrimination and to providing equal opportunity to all our employees ;
- Promote the development of our employees by considering their wishes for career development, in particular by offering them the opportunity for training;
- Promote good working conditions for our operational staff on site, by totally banishing the risks of forced, concealed or undeclared work;
- Maintaining and guaranteeing social dialogue within the Company, in particular by respecting staff representation bodies and freedom of association;
- Insist that our suppliers, subcontractors and business partners comply strictly with national and international labor law standards.

2. HEALTHY COMPETITION

As a major player in our various fields of activity, we are committed to ethical behaviour by refusing all offers of illegal agreements and generally all concerted practices. Business partners must be treated, without exception, fairly in all countries where our Company operates.

In order to combat these concerted practices, all employees are asked to:

- Not to exchange sensitive information, whether commercial or not, strategic or not, with competitors or interested third parties. This may concern, for example, our price lists, the names of our customers, development projects or capacity reductions.
- In the event of market delineation, use the legal department to assess the risks and our market position to avoid infringement.
- Do not boycott a customer or supplier in a concerted effort to distort competition and profit from it.

3. A STRONG AND PROTECTED IMAGE

As a major historical player, we have a brand image that we must protect in all circumstances.

In order to strengthen our reputation and the quality of our image, EXTRA TIME has implemented the following measures:

- Each employee must be aware of the values that structure us and the principles that are attached to them, namely respect, trust, exemplarity and, of course, the quality of customer service and the services provided.
- Each employee is the guardian of the Company's assets, which alone reflect the good health of our Company.
- Each employee is subject to a duty of confidentiality, so that he or she must not, throughout his or her term of office and even after leaving the Company, pass on information that would damage the Company's image. Finally, the communication of professional information is the responsibility of the Communication Department, which alone has the power to share the life of our Company in the media and social networks.

4. DATA PRIVACY

The management of information and data collected by our Company is a subject of permanent attention, which requires responsible behavior from each of our employees.

In order to comply with our legal obligations but also to protect our information, we have decided to implement the following measures:

- Each employee holding information is responsible for its protection and its distribution, both internally and externally. Our employees are asked to limit disclosure to those who have a legitimate interest in knowing about it. Only strictly necessary information should be disclosed. In general, our employees are asked to exercise the utmost discretion both in their work environment and in their private sphere. All data must be stored on a secure medium.
- The acquisition of information must be done in compliance with the legal framework. Information can be obtained by legal means: monitoring tools, note-taking, brochures, websites, etc. We therefore firmly prohibit our employees from fraudulently acquiring data, by means such as theft or hacking.
- All information that is not public must be protected. Especially when our Company collects or receives personal data from employees or third parties.
- We are committed to a process of continuous improvement of our IT systems in order to avoid any disastrous consequences of a cyber-attack or an intrusion. To this end, we constantly seek to improve the protection of sensitive information. We ask the same attention from all our business partners.

5. POLITICAL NEUTRALITY AND SPONSORSHIP

EXTRA TIME has decided to be completely politically neutral, and therefore all political contributions made by or on behalf of any of one of our entities are prohibited. All benefits in kind offered to political figures or parties are prohibited.

EXTRA TIME does not engage in any lobbying activities designed to influence in any way the production of legislation or the decisions of a government or institution in favor of a cause relevant to our business.

However, EXTRA TIME intends to promote its brand image by supporting a certain number of events, particularly in the field of sports. Sponsorship is therefore an important part of the Company's

communication, and such activities must be approved by the General's management.

6. PREVENTION OF CONFLICTS OF INTEREST

A conflict of interest arises whenever an employee is confronted with a private or personal interest that may influence him/her in the performance of his/her duties and cause him/her to act against the interests of the Company.

This personal or private interest must be understood in the broadest sense and includes both the direct interests of the employee and those of his or her family or close friends.

- All employees have a duty of loyalty to the Company. Thus, and insofar as possible, each employee is asked to limit all external activities that could place him or her directly or indirectly in a conflict of interest situation with EXTRA TIME. It is forbidden, without the Management's agreement, to work, directly or indirectly, on behalf of an existing or potential competitor.
- When the context surrounding a decision raises doubts for the employee as to impartiality or integrity, he or she must, in all transparency, inform the Legal Department.
- A transaction between EXTRA TIME and another Company in which one or more employees have a direct or indirect private or professional interest must be authorized in advance by the Company Director. Particular attention will be paid to transactions involving former EXTRA TIME employees, in order to avoid any risk of favoritism.
- All employees are prohibited from using their position within the Company to obtain privileged information about EXTRA TIME, with the aim of benefiting personally or a third party.

7. REFUSAL OF ANY FORM OF FRAUD

Fraud can be defined as conduct intended to deliberately deceive others in order to obtain an improper benefit or to evade a legal obligation. Fraud is therefore characterized by an intentional element and by a willingness to conceal the unauthorized act. Without distinction, fraud can be characterized either by an action or by a voluntary omission.

For example, typical cases of fraud are the misappropriation of products, materials or confidential information, the falsification of the Company's financial data in order to conceal figures or, on the contrary, to present more advantageous accounts, or to produce false expense reports. This list is not exhaustive, and many other cases can be cited as examples.

In keeping with its principles of transparency and integrity, EXTRA TIME will not tolerate fraud.

To this end, we are committed to the following principles:

- Under no circumstances will techniques of fraudulent circumvention of the law be tolerated or promoted within the Company.
- We are careful to produce reliable and accurate accounting and tax information, while maintaining traceability of all our operations in order to avoid any participation in operations that could be qualified as money laundering or terrorist financing. Should such a case arise, we will cooperate in a fully transparent manner with the competent authorities.
- Regular checks of our processes are carried out in order to secure all transactions and to make the rules applicable in the Company known.

8. FIGHT AGAINST CORRUPTION

EXTRA TIME is committed to preventing and combating all acts of corruption, influence peddling, misappropriation of public funds, favoritism or any other breach of integrity.

Corruption can be defined as an act by which a person, invested with a specific public or private function, solicits or accepts a gift, an offer or a promise with a view to performing, delaying or omitting to perform an act that falls, directly or indirectly, within the scope of his or her duties. Corruption, because it vitiates all of our relations with suppliers, customers or the administration, must not be tolerated.

To this end, we wanted to set up:

- (i) Increased monitoring by management of all commercial transactions with our clients, the choice of our subcontractors and, in general, any third party with whom we may deal;
- (ii) Involvement of human resources from the moment a new employee is recruited and throughout the employee's career within our Company (regular and appropriate training, propagation of the Company's values, monitoring and sanctions for questionable behavior, etc.);
- (iii) Internal audits of the various entities in order to analyze all current contracts, practices and the assimilation of expected rules;
- (iv) Increased vigilance with regard to our main suppliers, subcontractors and clients, particularly in the form of due diligence, in order to choose our commercial partners wisely;
- (v) The promotion of collective initiatives in order to put in place procedures adapted to the constraints in the field;

All employees are asked to be very transparent with their superiors and business partners, in order to avoid any behavior or facts that could be qualified as active or passive corruption, complicity in influence peddling or favoritism.

9. OUR RELATIONS WITH THIRD PARTIES

Due diligence procedures are implemented for all third parties with whom we collaborate.

. **Customers :**

In our relations with our customers, we constantly seek to offer the highest quality of services and products. This is achieved through the continuous evaluation of our processes through controls and the constant improvement of our technologies or processes.

We refuse any business relationship that would lead us to directly or indirectly violate the commitments we have made.

. **Administration :**

In the conduct of our business, we are sometimes required to interact with the administration of a state.

To this end, we prohibit all our employees from granting directly or indirectly, to any public official whatsoever, an advantage or an undue favor, so that he favors us by his actions or his behavior.

Also, transparency is a condition for the success of these principles, and we therefore strive to

conduct our activities in cooperation with the administration of the various states in which we operate, for example by offering our assistance during investigations or by providing fair information about our financial situation.

- **Suppliers and Subcontractors :**

Our commitment to integrity means that special care is taken when selecting our suppliers and subcontractors. We expect them to meet standards at least equivalent to those we meet today.

We ask our subcontractors and suppliers to be particularly attentive to their standards and procedures in terms of respect for human rights, particularly concerning the working conditions of their employees.

We make a point of not entering into a business relationship with a supplier, distributor or subcontractor who has been convicted, either at the Company level or at the level of its managers, for acts of corruption, non-respect of human rights, money laundering, etc.

Our subcontractors or suppliers are asked to sign a Supplier Code of Conduct to ensure that their own subcontractors adhere to principles equivalent to ours and to agree to be audited so that we can verify the compliance of their procedures.

Anti-bribery clauses are included in our standard contracts and terms of sale with third parties.