

Code of conduct

Toulouse – Sept. 2020

Preamble of CYLAD's code of conduct

CYLAD is signatory of the United Nations Global Compact* (2020) and this Code of Conduct reflects our commitments.

During all working hours and throughout the duration of their contract/collaboration, **all Cyladians, from consultants to partners, embody the company, its values and conduct rules.**

The protection of CYLAD identity and reputation is a **shared responsibility** that requires all employees' attention. Therefore, **all Cyladians must comply with the following code of conduct, which includes the list of mandatory principles and ethical rules.**

Our recruiting process takes into consideration the matching between our **code of conduct & values and the candidate's profile**. When joining CYLAD, newcomers receive a copy of the code of conduct as **part of the welcome package**.

CYLAD Code of conduct is consistent and complementary to Social / Labour Laws and French SYNTEC Code of ethics (2009 version).

To ensure that we remain at any time within the limits given by our code of conduct we encourage our employees **to raise any doubts or questions** they may have towards the legality and the ethic in their work inside or outside CYLAD, in particular at our clients. **Cooperation, trust and honesty** among our people provides the necessary team spirit to discuss these serious issues.

* The 10 principles are described in appendix



CYLAD code of conduct lists ethical and mandatory rules

We are committed to respecting the internationally recognized Human Rights and Labor Law.

LABOR, HUMAN AND EMPLOYEE RIGHTS

Integrity is part of our DNA. We secure mind independence and place our client interests above all.

INTEGRITY

We are viscerally attached to fight all kind of discriminations and secure equity and fairness in our internal and external relations.

EQUITY AND FAIRNESS

We are committed to respecting confidentiality towards our employees as well as our clients.

CONFIDENTIALITY AND SECURITY

Labor, Human and Employees Rights 1/2

We all feel concerned by our social responsibility as a company and thus **embrace the respect of Human Rights and Labor Law, regardless of the job or its location.**

Labor and Employees Rights

- We have a **deep respect and consideration for our employees' Rights**, regardless of the nature of our contractual relationship.
- We ensure the **equality of Rights** between all of them, whatever the country / office they work for.
- We **respect our employees' Rights**:
 - we do neither tolerate any form of **forced labor**, nor require payments or any other deposit from employees as condition of employment,
 - we do not employ individuals who are under the **legal minimum hiring age**
 - all our employees have an **official employment status**, we always pay them on time and amount and make sure they enjoy the vacations defined by their contract,
 - employees are supposed to **work as per their contract** and encouraged to report any request of non contractual labor (activity, working hours, security...).
 - each employee has always the Right to stand for his opinion: we guarantee their **Right of association and collective bargaining**, their Right of speech and their Right for **security at work**.
- We promote those elementary Rights and Laws at our clients. As there is **no possible negotiation when it comes to Human Rights**, we don't make any arrangement about it and expect our **clients to behave as well**.

Labor, Human and Employees Rights 2/2

Harassment

- We take care that **no kind of harassment** has a place in our company.
- We take care that our employees do not suffer from physical, verbal, sexual or psychological harassment, abuse, threats **whatever their origin**, whether it's internal to CYLAD or coming from one of our clients.
- Our employees are encouraged to report any violent, threatening or abusive conduct from their professional environment (client, manager, provider, etc.) to HR Director or any Partner. Every employee has a **mentor** who may be a privileged contact to raise these concerns and alerts.
- Any complaint will be taken seriously and investigated. Towards our employees, disciplinary measures can be taken if needed. In the same way, in the event of a problem of this nature with a client, then we expect the client to investigate and take appropriate actions to prevent this from happening again.

If a consultant encounters a case in which the above principles are not respected, or has any doubts, he shall refer to the Procedure for reporting alerts and remediation of identified cases of discrimination and / or harassment.

Employee's Privacy

- We respect employee's privacy, and we care about their work/life balance.
- Private information is only collected when necessary. An employee may request to have access to their own private information and the reason for gathering it, at any time.
- We do not collect any data from employees privileged relations (partner, doctor, lawyer...)

Equity and Fairness 1/2

Non discrimination

We are committed to **fight all kind of discrimination**. We ensure there is no discrimination of any kind during hiring, remuneration, development or promotion of our employees.

When recruiting or evaluating employees, we never consider age, gender, sexual orientation, disability, political opinions, religion, ethnic, social, cultural or national origin as parameters. Our employment advertisements do not reference any of these elements and we do not ask applicants for information on them, including marital status, pregnancy, intent to have children, health status or any information that may lead to discriminatory decisions.

Recruitment decisions are based on the match between our operational needs and values, and the candidates' skills/expectations/values.

If a consultant encounters a case in which the above principles are not respected, or has any doubts, he shall refer to the Procedure for reporting alerts and remediation of identified cases of discrimination and / or harassment.

Equity

We believe a **fair assessment of our consultants' work** is the main condition to build a fair work environment. Our partners work together to provide such fair valorization for everyone, based on relevant, objective and pre-defined criteria.

- All managers must follow the **evaluations grids**, assess consultants on **predefined criteria** and **justify their evaluations** to other managers and to partners. Performance reviews are **fact-based** and **collectively performed** by all managers to foster fairness and **equity during evaluations**.
- Remuneration and promotion are only driven by seniority, maturity in the grade and performance. As an example, gender has no influence and our **gender salary index** is monitored to secure equity between women and men
- We ensure maternity or paternity leave, partial employment does not negatively impact employees' compensation and careers.

Equity and Fairness 2/2

Fair competition practices

An anti competition behavior occurs when a **company tries to reduce competition or overcome it with illegal means**. For example, ensuring a monopoly is considered as an anti competitive practice.

We only use **fair commercial and competition practices based on mutual respect** towards our clients, competitors and partners.

- In order to maintain a fair competition, we **never make agreements with our competitors** to regulate prices, allocate market shares or exclude a client.
- For any new contract we **always adhere to the client's ordering process**. If it means facing competitors, we base ourselves on our proposal to win the contract. We never encourage a client to discard our competitors.
- We **don't gather information about our competitor by illegal means**. Nevertheless, it is important for us to have knowledge of our competitors, for these purposes we use **only on public information**.

Integrity 1/2

Conflict of Interest

A conflict of interest is a situation where there are doubts about the drivers of a stakeholder's decision. In our business we see three cases when such ambiguity may occur: a consultant has both professional and personal interest, a consultant works with two competing companies, the client's interests are opposite to Cylad's interests.

- **Avoiding conflict between professional and personal interest is beyond ethical issues.** We don't let any personal interest affect our judgements or be considered during decision-making process: as an example, employees are not allowed to buy / trade / sell shares of firms for which they have access to sensitive data.
- **Transparency on potential conflict of interest is a cornerstone of integrity and trust.** It is the only way to do the business we do.
 - We proactively communicate capital, financial or commercial links with partners, suppliers or other customers likely to generate conflicts of interest in the context of the execution of missions
 - When we identify potential conflicts of interest, we **inform clients and with their agreement**, we ensure **no sensitive information is shared** inside Cylad and **exclude the concerned person(s) from the project**. The variety of our missions and clients ensure each employee may be staffed on an adequate project.
- Every Cylad's decisions is made to **achieve what is best for the company and our clients**. Our clients rely on us for our independence and our external point of view. We develop long term relationships with our clients and claim to be considered as trusted partner, thus no politics or commercial interest can subordinate our client interests.

Integrity 2/2

Bribery

Bribery refers to the offering or receiving of any item of value as means of influencing the actions of a professional. This may include money, services, products.

- We must participate in **fighting corruption**, therefore, we always obey the **local anti-bribery law**, depending on the area we work. We expect our contributors and clients to behave as well and **don't work with clients which have bribery issues**, even if these issues are not connected to our business.
- In some cases we may have **business courtesies** such as meals, entertaining and social events with our clients. We keep **track of these expenses and they remain moderate** and in line with our clients' policies. Similarly, employees are **not allowed to take personal advantage from their relationship with clients**.

If a consultant encounters a case in which the above principles are not respected, or has any doubts, he shall refer to the Procedure to report corruption and bribery and specific approval procedure for sensitive transactions (e.g. gifts, travel).

Fraud / Money laundering

Fraud consists in cheating towards law to obtain valued advantages. Typically, hiding part of revenues or benefits to avoid taxes. Money laundering consists in the concealment of the origin of money earned by an illegal activity.

- Cylad always keeps **clear, transparent and complete records of every business cost and revenues**. Each payment made to Cylad has previously been defined by a contract with the associated client. Each revenue is confirmed by a bill and remains within the limits defined by our contracts.
- We consider ourselves as responsible for ensuring that Cylad is **not part of any money laundering process**. Our sales must match with our clients' revenues and their departments' budget. Any doubt about the origin of our incoming payments is a reason enough to cancel any contract.

Confidentiality & security

Confidentiality

We have a **deep respect for our clients' confidentiality**. Any information concerning our clients, our projects and products could be considered as confidential.

- We **never disclose private information** without client's agreement.
- We never discuss our clients' private information with external stakeholders.
- When we refer to our previous projects, we never use the client's name or critical and confidential information.
- Our consultants are regularly reminded on our confidentiality rules.
 - Every employment contract contains a **confidentiality clause** applicable during execution of the contract but also after leaving Cylad.
 - Moreover, on client request, Cylad employees may be requested to sign **NDA** (Non Disclosure Agreements) for missions they are working on and are expected to respect it.

Security

We are **trusted with sensitive and confidential information** for our clients. It is part of our professionalism to avoid any situation that may jeopardize the security of the information we have been given.

- We **always comply with our clients' security rules**.
- Furthermore, we have our **own good practices for information security**. Our people **always use safety screens**, all data and IT productions should be stored on Cylad's environment only. In public area (e.g. airport) we never view critical information or any information that might help identify our clients, such as any documents with our clients' logo.

These rules and good practices are formalized in the IT charter section of our welcome package and signed by all consultants.

For more information, refer to the document [IT Security Policy](#). If a consultant encounters a case in which the above principles are not respected, or has any doubts, he shall refer to the part 5 "Risks & incidents management" of the IT Security Policy.

CYLAD

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The Ten Principles of the UN Global Compact

Human Rights

- 1 Businesses should support and respect the protection of internationally proclaimed human rights; and
- 2 Make sure that they are not complicit in human rights abuses.

Labour

- 3 Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- 4 The elimination of all forms of forced and compulsory labour;
- 5 The effective abolition of child labour; and
- 6 The elimination of discrimination in respect of employment and occupation.

Environment

- 7 Businesses should support a precautionary approach to environmental challenges;
- 8 Undertake initiatives to promote greater environmental responsibility; and
- 9 Encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

- 10 Businesses should work against corruption in all its forms, including extortion and bribery.