# CODE OF ETHICS

WALKING THE TALK

April 2023

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#### FOREWORD BY THE EXECUTIVE BOARD

Dear employees,

Our Group's active development for over 20 years rewards the expertise, professionalism and commitment demonstrated by its teams.

We have strived to achieve sustainable and responsible development, respectful of the Group's core values and conducive to strengthening a professional culture based on rigor and ethics.

The values that form the basis of Intelcia's strength and its unique culture have always been promoted by our employees, verbally, "by setting an example", or through local charters. These values are part of the implicit pact that binds each individual to the entire Group.

However, at a time when thousands of new employees are joining our Group every year, in Morocco and beyond, and particularly in so many new countries, we felt compelled to proudly re-emphasize the principles that must continue to guide our day-to-day interactions with all the stakeholders involved in our operations.

We have therefore decided to formalize and consolidate them in this Code of Ethics.

Each and every one of us is responsible for fully embracing this approach and adopting this Code to enable us to fully demonstrate our commitment, which will also be brought to the attention of all our stakeholders.

We urge you to read this reference document carefully and to embrace it by being a promoter of the principles it enshrines.



Karim Bernoussi CEO





Youssef El Aoufir coo



#### **PURPOSE**

This Code presents the set of values and behaviors by which Intelcia intends to conduct its operations.

It outlines our commitments and expectations towards our various stakeholders and serves as an ethics guide for our employees and any other person or entity working with Intelcia.

It is meant to supplement the applicable local and international laws and regulations, as well as Intelcia's internal regulations.

This Code is not a comprehensive document covering all legal and moral issues that employees may encounter.

However, it will point out the resources that can provide guidance when making the right choice is not obvious.

Intelcia reserves the right to change, modify or correct this Code at any time with or without notice.

#### **SCOPE AND APPLICATION**

This Code applies to the Intelcia Group, its subsidiaries around the world and all its employees, regardless of their position and hierarchical level, in their relations within the Group and with the outside world.

This Code is also intended for all our stakeholders: managers, employees, customers, partners, suppliers, etc.



#### INDIVIDUAL RESPONSIBILITIES

This Code of Ethics is for you. Read it. Understand it.

Each of us pledges to uphold it by acknowledging that we have read and understood it.

#### Every day,

- Each and every one of us must question ourselves and our practices :
- Am I true to Intelcia's values?
- Are my actions or decisions legal and ethical? Do they comply with Intelcia's policies?
- Could my actions or decisions have a negative impact on Intelcia's interests and reputation?
- Am I willing to be transparent about my actions or decisions? Am I willing to speak publicly about them?
- Each person must understand the risks to which their position is exposed and learn how to manage them
- Each person must seek advice from his or her line manager or the Human Resources Manager on site if in doubt
- Everyone must report cases of proven infringement, by alerting their hierarchy and/or the Human Resources Manager in the first place or, failing that, by reporting it via the Intelcia Integrity Counts platform as a last resort. This alert channel is accessible both internally via the intranet and externally via the website.

Due to their management and supervisory role, team leaders and managers, more than any other employees, must demonstrate unwavering commitment to the Group's ethical principles.

As such, they are even more bound by the following responsibilities, which apply to everyone:

- Embody Intelcia's values and ethical principles in all circumstances
- · Create an environment that fosters ethical behavior
- Ensure that their teams are involved in training and other arrangements provided on matters of ethics
- Be vigilant to prevent and detect any violation of the Code and take appropriate action
- Provide relevant advice or make the appropriate decision if approached on an ethical issue.

#### **SANCTIONS**

As a reminder, the principles laid down in this document, which have been reviewed and approved by Intelcia's management, are essential, and no one within Intelcia can deviate from them, regardless of his or her position in the company.

In light of the importance of integrity for our long-term success, any breach of this Code of Ethics by employees may result in disciplinary action up to and including termination of employment, in accordance with the law applicable, or even legal proceedings in the criminal courts, depending on the severity of the incident.

# OUR FUNDAMENTAL VALUES

#### RESPECT FOR OUR VALUES

Values bind us together.

Values are what sets us apart, what make us unique.

Values set the tone for our actions, our day-to-day activities and our decisions.



Optimism. Ambition. Boldness.



Transparency. Respect. Caring.



**Excellence. Agility. Inventiveness.** 

Our optimistic vision is resolutely forward-looking. It helps us to envision and shape a better future.

At Intelcia, we value differences. This is how we create meaningful, lasting relationships that inevitably lead to collective success.

We are builders.

We go the extra mile every day to find solutions to every hurdle. This is what allows us to be agile in responding to our clients' requirements and needs.

#### RESPECT FOR PEOPLE

Respect for people is one of Intelcia's fundamental values.

Everyone must play their part to create both hierarchical and functional quality professional relationships, by being honest, loyal and respectful of everyone.

Thus, Intelcia intends to combat all forms of discrimination and harassment, whether they are of a moral or physical nature (ethnicity, age, gender, physical appearance, disability, educational level, hierarchical level, religion, nationality, sexual orientation, membership in groups or political orientation, ...).

This commitment applies to Intelcia employees as well as all those connected to its stakeholders.

#### Your responsibilities:

- Always treat others with respect
- Recognize and promote people based on their inner qualities and treat them with dignity and without discrimination
- · Refrain from all forms of harassment and intimidation
- Report any behavior that violates a person's dignity.

#### RESPONSIBLE COMMUNICATION

Our communication reflects who we are and what we stand for.

Our interactions aim to foster Group cohesion, promote our values and uphold our reputation and objectives.

In an increasingly digital world, we are all responsible for our e-reputation.

Information or comments shared on the Internet (social networks, blogs, etc.) may have a considerable and permanent detrimental impact on our image.

#### Our commitments:

- Develop ever more effective internal communication tools
- Communicate regularly and in a transparent manner with the Group's employees.

- Avoid insulting, hateful or threatening language in your internal and external interactions and communications
- Be honest and accurate in your communication. Misrepresentation can be seriously detrimental to Intelcia and to your own self
- Control the content of your internal and external publications.
   The NetBehav'ln available on MyIntelcia intranet is your reference document
- Be cautious when interacting through digital media, whether on behalf of or about Intelcia
- Never speak or act on behalf of Intelcia, or give any impression of doing so. Only designated spokespersons are authorized to do so.

#### PROTECTION OF INTELLECTUAL PROPERTY

The term "intellectual property" refers to Intelcia's intangible assets created and developed by employees in the course of their their professional duties at Intelcia: ideas, know-how, documents, practices, methodologies and organizations, etc.

Our employees are expected to respect and protect our intellectual property and to avoid any unauthorized or inappropriate use or distribution.

Similarly, we respect the legitimate rights of third parties to intellectual property

#### Your responsibilities:

- Ensure that Intelcia's intellectual property and know-how, regardless of their nature, are not made available to others
- Not to copy, share or modify any third party copyrighted material, unless you or Intelcia have obtained prior written permission from the copyright holder. Failure to do so may tarnish the Group's image and may result in criminal sanctions
- Respect the confidentiality of the information or intangible assets of partners or colleagues, whose disclosure would be likely to harm their interests
- Report any misuse of Intelcia's intellectual property rights by a colleague.

These obligations remain in effect even after the departure from Intelcia, according to the contractual provisions.

#### PREVENTION OF ECONOMIC CRIMES

Our Group is careful to comply with local legislation and international law, particularly with regard to business law and ethics.

We take very seriously all subjects relating to economic offences, mainly: fraud, corruption, conflicts of interest, scam, theft, abuse of corporate assets, counterfeiting, forgery and use of forgery, and any related offense.

On a more serious and more international scale, we guard against and forbid ourselves from taking part in any activity directly or indirectly linked to embargoes, arms and narcotics trafficking, money laundering, terrorism, influence of all kinds and in particular the political destabilization of a country, region or locality, etc.

We undertake to carry out our economic exchanges within the framework of the rules of competition and international trade, respecting intellectual property law, import and export licenses and customs, and all principles of this order.

We expect all our stakeholders, in particular our employees, our customers, our investors and our suppliers, to comply with these principles.

- Ensure that any transaction with any stakeholder involving Intelcia complies with the above principles
- If in doubt, seek the advice of your line manager, the Compliance Manager or the Legal Manager (depending on the subject).
- Alert in the event of an infringement or suspected infringement to General Management or via the Intelcia IntegrityCounts alert platform.

## PREVENTION OF CONFLICTS OF INTEREST

Regardless of our functions, every single one of us must perform our duties in good faith and show loyalty to Intelcia.

This principle entails the need to protect ourselves from behaviors and situations that may constitute a conflict of interest.

A conflict of interest is defined as any potential or actual conflict, involving the interests of the Group or one of its external stakeholders, and the personal interests of an employee or any natural or legal person of his or her circle, which may affect the normal course and/or outcome of a business relationship, a contract, positions taken, etc.

- Ensure that your personal interests or those of your family members do not conflict with the interests of Intelcia and its external stakeholders
- Protect yourself by always disclosing your relationships, partnerships or activities, when they may create actual or potential conflicts of interest, to your manager and/or the Human Resources department, so that the situation can be assessed and managed appropriately
- Avoid responsibilities and actions that could have an impact on Intelcia and its reputation (e.g. public speaking, affiliations with groups, financial interests in companies in the value chain or related to the business...)
- In case of doubt, refer to your manager or to the Compliance Department; any conflict of interest must be reported immediately.

#### PREVENTION OF FRAUD

Fraud is defined as an act that has been carried out by unfair means and whose purpose is to obtain consent, to obtain an undue material or moral advantage or eluding law enforcement. The notion of fraud includes, for example: misleading, swindling, forging or altering records and documents, forgery and the use of forgeries ....

Any form of fraud is prohibited, whether it concerns company property or third party property.

Intelcia has a rigorous compliance program based on a "Zero Tolerance" principle.

Fraud damages our reputation and harms us all.

- To avoid any act of fraud as it has been defined, whether it is for personal purposes or by yielding to pressure from a third party
- To protect, from any disclosure and any illicit use, the personal and confidential data concerning Intelcia, its customers or its employees (operational, financial, human resources, legal affairs, development, audit, contracts, commercial data, etc.)
- To perform all your activities with professionalism, independence of judgment and integrity. These must be documented fairly, accurately and transparently, and properly archived so that they can be substantiated at a later time if needed
- To help protect the Group's business and reputation by monitoring any fraudulent activity against our customers, shareholders, partners or other stakeholders
- Immediately report any irregularities or suspicious activity to your management
- In the event of the discovery of an inaccuracy in the accounting or financial information, or if you believe that someone has improperly concealed, modified or destroyed a register, you must report it to your hierarchy or via the Intelcia IntegrityCounts alert platform accessible on the intranet and our website.

#### PREVENTION OF CORRUPTION

Corruption refers to the diversion of the course of a transaction or a relationship through the granting of favors and the exchange of benefits between the bribe-giver and the bribe-taker

Georruption inflicts significant costs to businesses and therefore reduces opportunities for investment, growth and innovation. It creates dependencies and hinders sustainable business relationships. Products are more expensive, national economies grow at a slower pace and fail to achieve the expected level of prosperity. Thus, corruption harms everyone. Transparency International

#### Rules for donations:

Within the framework of its social responsibility, Intelcia enshrines solidarity actions in its corporate identity.

Donations to charities and associations made on behalf of the Group and using its financial resources and reputation are authorized subject to compliance with applicable laws and regulations.

These donations must serve the cause of the associative or charitable organization in question, while contributing to the Group's image as a good corporate citizen.

In addition, being completely neutral, Intelcia refrains from supporting any political, religious or other organization or activity by donations or subsidies, even when the local legislation allows it.

#### Rules on Sponsoring:

Sponsoring is a part of the marketing and communication strategy. It is authorized subject to compliance with applicable laws and regulations and is done within the exclusive framework of the Group's communication strategy, as well as the Group's societal responsibility.

It obeys the same rules and principles as those related to the Donations.

- Never engage Intelcia in a donation or sponsoring operation without the prior and duly informed approval of General Management, through the Brand & Engagement Department of the Group
- Make sure to apply the ethical principles to sponsoring activities, and ensure that no other considerations than those related to Intelcia's goals and communication strategy are made.

#### PREVENTION OF CORRUPTION

#### Gifts & Entertainment Guidelines:

Offering or accepting gifts or entertainment are courtesies that strengthen a business relationship.

However, they can lead to a risk of conflict of interest and a threat to the Group's reputation.

Anti-bribery laws prohibit giving gifts or services to a person for the purpose of obtaining an undue advantage or influencing a business decision or any other action, if the professional independence of employees is likely to be compromised, either for real or in perception.

Intelcia is vigilant with regard to this concern, particularly within the Purchasing, Marketing & Sales, Brand & Engagement Departments, and within Top Management.

In addition to the measures that Intelcia has implemented at the global level, the Group is fully aware of the legislative and legal specificities of each country.

#### Your responsibilities:

- Ensure you are in line with the following principles for gifts and hospitality, given as received
- Any gift must comply with the principles of integrity, in the sense that it occurs in a context of symbolic and courteous thanks for the partnership, without any intention of influence and without expectation of immediate and obligatory consideration, present as coming.
- Any gift must be symbolic and reasonable, according to the customs of the local culture, its global rules and convetions.
- The same goes for invitations, which must be limited to a moment of catering or a shared event (for example a gala, a show, a charity, ..), excluding luxury invitations (such as trips for example).

#### In any situation, make sure to respect our gifts and invitations policy

- 1 -Avoid building any relationship involving gifts or invitations being made or expected by you and/or the other party
- 2 -Ask yourself, if the case arises: Is it legal? Does it comply with the Group policy and the Code of Ethics? Is it with an ulterior motive? Will this change the relationship or put one of the parties in a situation of accountability?
- 3 -Politely refuse an invitation or a gift if they seem disproportionate or do not respect the above principles
- 4 -Seek advice from the line manager in case of doubt
- 5 -Systematically record all gifts and invitations received as offered in a register kept by the Compliance Manager, regardless of their scope or value, as well as at the level of the Order Office
- 6 -Contact the Compliance Manager in case of doubt or problem.

#### **TOWARDS OUR CUSTOMERS**

Attentive to the needs and expectations of its customers, Intelcia harnesses all its skills and energies to serve its primary mission: customer satisfaction.

We build and maintain the trust of our customers, in particular through full respect of their brand, the preservation of their interests and a constant concern to only make commitments that can be kept and fulfilled.

#### Our rules of conduct:

- To provide customers with fair, clear and non-deceptive information
- To be transparent, in particular by providing our customers, upon request, with all information concerning the execution of their operations
- To respect the principles and values of our customers
- To protect our customers' brand image
- To observe appropriate data privacy practices in the collection, processing and/or transmission of personal data of end customers
- To have well-defined policies and processes and sufficient system and network capacity to deliver reliable services
- To have a business continuity plan that outlines the different crisis situations and how Intelcia plans to deal with them
- To ensure training and monitoring of our production teams to ensure the provision of high-quality, reliable services and comply with all the requirements of the customer partner

#### **TOWARDS OUR SHAREHOLDERS**

Intelcia is committed to transparency and responsible business practices.

Driven by its values and compliance with the laws that govern its operations in all its locations, Intelcia is committed to fulfilling its obligations to its shareholders and respecting their brand image.

- To manage the business with professionalism and diligence
- To protect the assets from any foreseeable and avoidable risks
- To maintain and process our business transactions and records with accuracy and integrity
- To report to investors on the management of the business
- To create accounting records that accurately reflect the underlying event or operation
- To record transactions as required by our internal control system and applicable laws
- To preserve, protect and dispose of records in accordance with applicable policies
- To manage our tangible and intangible capital in a manner that enhances the trust and investment of our shareholders

#### **TOWARDS OUR EMPLOYEES**

In order to uphold our commitment to attract and retain talent, our work environment must be continuously pleasant, professional and respectful.

Such an environment not only contributes to the Group's success, but also to the creation of an environment conducive to employees' growth and achievement of their full potential.

Our responsibility is to create and enrich such a collaborative environment, ensuring that it is geared towards diversity, inclusion, meritocracy, and free from any form of discrimination, harassment, favoritism, or any other behavior inconsistent with our principles, values and identity.

Finally, we place particular emphasis on excluding the use of child labor, any other form of forced or compulsory labor and clandestine work, whether among our teams or those of our partners and each of our stakeholders.

#### Our rules of conduct:

- To adopt the same standards at the global level while adapting to the labor code of each country
- To offer suitable training programs, reconciling the needs of the company and the development of our employees' professional qualities
- To implement a fair and transparent employee management policy
- To inform our employees of internal growth opportunities by means of dedicated communication tools
- To guarantee the health and safety of our employees at all our sites

- To provide each employee with the tools to ensure compliance with the rules of equity and the company's operations
- To encourage managers to develop a good working environment, in particular through mutual respect, proximity, regular information to their employees and the promotion of team spirit
- •To offer our employees a forum for personal expression and to allow them to take part in our commitments within their communities, in order to create a human dynamic centered on work
- Ensure an alert channel through Intelcia IntegrityCounts.

#### **TOWARDS OUR SUPPLIERS**

Our suppliers and business partners significantly contribute to our prosperity.

Intelcia looks after the interests of each party, in accordance with clear and fairly negotiated contractual terms.

This relationship is based on integrity, professionalism and respect of commitments.

Our Responsible Purchasing Charter, which we share with all our business partners, seals the principles of the relationship we have with them and which is under the seal of social, societal, ethical and environmental responsibility.

- To be transparent in our selection rules and strategies: based on our needs, quality, service, price, terms and other relevant criteria;
- To guarantee a business relationship with a proportionate balance of power, respect for mutual interests and the principles of negotiation and win-win services
- Refrain from any conflict of interest that could alter objectivity and independence of judgment
- Respect and enforce mutual commitments.

#### In addition, our suppliers must:

- Observe ethical standards equivalent to our own
- Not to commit Intelcia's reputation or to act on its behalf
- Report situations that are in violation of these rules rules via the Intelcia IntegrityCounts platform available on the website

Failure to observe these principles is taken very seriously. It can lead to the deterioration of business relationships.

#### **TOWARDS OUR COLLEAGUES**

Competition between colleagues is based solely on the criteria of competence and quality of services offered to customers

We are committed to fair competition and to complying with applicable laws.

#### Our rules of conduct:

- To refrain from diverting a colleague's customers by using methods that go against competition laws and practices
- To refrain from harming a colleague by way of any procedures, maneuvers or statements that go against the principles of truthfulness and fair competition
- To refrain from any disparagement of a colleague, by any means whatsoever.

## TOWARDS THE ENVIRONMENT AND CIVIL SOCIETY

By establishing ethical rules, Intelcia underlines the importance of social, environmental and economic concerns in its relationship with all its stakeholders in each of its locations.

Intelcia is committed to adopting Corporate Social Responsibility (CSR) principles and to acting as a role model in terms of responsibility.

In each of the sites where Intelcia is established, the group operates as a local reference, forging ties with its host environments and seeking to positively influence their development.

Our Eco-responsibility Charter, available on our website, is the cornerstone of our policy in this area.

- To develop strong relationships with local authorities at the time. of our establishment, in order to maintain an ongoing dialogue and to always have insight into the security situation of the countries
- To manage in a transparent way the actions and budgets with social and environmental partners (associations, NGOs, etc.)
- To communicate in a transparent way about the social and societal impact as well as the ecological footprint of Intelcia, at the local and global levels
- To maintain communication channels with the company's stakeholders, in particular NGOs and associations.

#### **TOWARDS OUR ECOSYSTEMS**

Wherever the Group is established, our success and reputation rely on our compliance with all applicable local, national and international laws, regulations and conventions.

Regardless of the field, Intelcia strives to strictly comply with all national and international laws and conventions, whose principles of respect for rights and freedoms are also shared by the Group.

#### These include in particular:

- -The United Nations Universal Declaration of Human Rights
- -The United Nations Convention on the Rights of the Child
- -The principles of the International Labour Organization
- -The principles of the World Health Organization
- -The United Nations Convention against Corruption
- -The EU whistleblowing law
- National legislation relating to work and social dialogue, ethics, and respect for the environment.

- To develop processes and procedures, as well as provisions in our contracts, to ensure that the above-mentioned laws and conventions are integrated into our operating rules and practices
- To demonstrate our commitment by signing covenants, or by obtaining labels that control our application of the principles set out in these documents;
- To train and raise the awareness of our employees in this respect, for example on the topic of non-discrimination, corruption and data privacy
- To provide various whistleblowing mechanisms and means of recourse for our stakeholders, in order to ensure that no obstacles are created.

# GOVERNANCE

## **GOVERNANCE**

#### **GOVERNANCE BODIES**

General Management, and regional and local managements, through the various governance bodies dedicated to CSR, ensure that the actions of its employees comply with ethical values.

These governance bodies are planned at all levels, from the Clusters to the Corporate, including the Regions. They discuss and coordinate topics related to CSR, including ethics.

A cross-functional thematic committee dedicated to Ethics and Data Protection is even planned to ensure that the subject is well handled.

All of this governance plays the role of guardian of the Group's ethical values, being mainly in charge of:

- Monitoring ethics-related topics and projects on all levels mentioned in this Code
- \*Keeping reports on the monitoring of ethical indicators
- Internal and external audits of the ethics system on the sites, if deemed necessary
- •Monitoring of technologies, legislation or other obligations and opportunities relating to this subject.

#### WHISTLEBLOWING MECHANISM

The conduct of each individual can contribute to consolidating an ethical environment and positively influencing other people's behavior.

Ethics whistleblowing mechanisms allow Intelcia to continuously improve its procedures such that it can continue to conduct its business in an ethically sound manner.

The alert platform, Intelcia IntegrityCounts, has been set up so that no conduct that deviates from our principles and values is ignored. It has been made accessible to all stakeholders by means of a redirect link to the platform available on the intranet and the website.

Reports via the Intelcia IntegrityCounts ethics alert platform reach the highest regional and corporate level, and give rise to a preliminary assessment to verify whether they fall within the scope of the alert system.

If necessary, an Investigation Team treats the case confidentially. If the case turns out not to be of an ethical nature, it is redirected to the most appropriate Direction to deal with it.

#### Our commitments:

- We take all reports of violations of the law, this Code or company policies seriously;
- We conduct investigations in an impartial, thorough, timely and caring manner
- We cooperate truthfully with any investigation and maintain the appropriate level of confidentiality.

#### Your responsibilities:

Any employee, acting in good faith, is free to report any suspected violation of the principles set forth in this Code.

Reporting may relate to:

- Violations of the Code of Ethics
- Any felony or misdemeanor, clear violation of laws
- A serious threat or harm to the public interest.

The whistleblower must objectively present ascertainable facts of which he or she has personal knowledge, first to his or her line manager or to the Human Resources Manager on site or, as a last resort, via Intelcia IntegrityCounts.

### GOVERNANCE

#### Before sending a feedback via Intelcia IntegrityCounts remember to:

- Make sure you know how serious your whistleblowing is;
- Take a step back from the situation and do not get caught up in your emotions
- Report proven violations, first to your line manager and/or Human Resources Manager, and as a last resort via Intelcia IntegrityCounts making sure to:
- ✓ Provide proofs
- √ Stay impartial

#### PROMOTING THE CODE

Measures must be implemented to ensure that this Code of Ethics remains a living tool:

- Raising employee awareness of this Code
- \*Training employees, according to their job, on the ethical principles set out in the Code
- Disseminating the Code among all stakeholders
- Incorporating ethical issues as detailed in this Code into the CSR Committees
- Implementing tools to access the Code and report misconduct.

#### Our commitments:

- Instill the Group's values and principles of action from the moment an employee joins the Group
- Make this Code available to all stakeholders: employees, suppliers, customers, etc.
- Materialize adherence through training to the principles of this Code of Ethics
- If deemed necessary, carry out an internal audit to ensure compliance with the provisions of this Code in the context of the missions and procedures specific to each department and function.

#### Your contacts for ethical issues:

- Team managers and Human Ressources have a specific responsibility for implementing the principles of the Code
- In addition to acting as role models in all circumstances, they must assist and support their teams on a daily basis with regard to ethics
- To this end, they must receive specific training on this Code.

# Delecia Better together.

