

Date: July 2024

## **Policy on Prohibition of Corporate Funds for Political Activities**

Dear customers, suppliers and partners,

VusionGroup maintains a strict policy prohibiting the use of corporate funds or resources for political activities and does not allow reimbursing private political contributions. This encompasses contributions to political parties, political organizations, or candidates at any level in any country even when permitted by applicable law (including using funds for communication supporting or opposing political candidates or parties).

All charitable donations and sponsorships must adhere to the guidelines of the Group.

**Codes for Employees and Suppliers:** to ensure compliance, VusionGroup created two codes, which lay the foundations of this policy:

- **The Supplier Code of Conduct signed by every supplier**, who must respect it. The integrity values are clearly defined with zero-tolerance for any form of bribery, corruption, extortion, and embezzlement. Suppliers must avoid any behavior that might hinder trust and avoid any conflicts of interest or situations that appear to be potential conflicts of interest.
- **The Code of Ethics signed by each employee** upon arrival in the Group. The third part of this Code elaborates on anti-corruption rules regarding conflicts of interest, active and passive corruption, bribery and facilitation payments, gifts and invitations, charitable activities and sponsorship.

In alignment with these Codes and this policy, VusionGroup refrains from making political contributions, whether monetary or in-kind.

VusionGroup respects the rights of employees to engage in their communities and acknowledges their right and responsibility to participate as private citizens in political and governmental affairs or to join trade unions. Decisions regarding involvement in a political campaign or contributions to a candidate or political party are considered employees' personal decisions and are voluntary.

While VusionGroup upholds employees' rights to engage in political activities as private citizens, they are required to maintain a clear distinction between their personal political contributions and activities and their professional roles.

Additionally, employees, whether current or former, holding or seeking political office must avoid giving the impression of acting or speaking on behalf of the Group. If they intend to accept a political position based on their status as a current or former VusionGroup employee, prior approval from VusionGroup is mandatory.

VusionGroup strictly refrains from making any monetary or in-kind contributions for political purposes. If an employee makes such a gift in a personal capacity, they must ensure there is no implication that the gift is connected to the Group. Under no circumstances will VusionGroup reimburse or provide any in-kind benefits for personal political contributions made by employees or to compensate for private gifts or contributions made by employees.

VusionGroup also ensures it does not indirectly contribute to political parties or institutions.

This unwavering commitment underscores VusionGroup's dedication to ethical conduct and integrity in all aspects of its operations.

**E-learning for employees:** To reinforce these principles and to ensure full awareness and compliance among all employees, the Group developed an **e-learning training**.

Teams are trained on ethical business conduct, on topics such as money laundering, fair competition, conflicts of interest, passive and active bribery, kickbacks and facilitation payments, gifts and invitations, charitable works and sponsorship, as well as the whistleblowing procedure. **This training is mandatory** for all new hires and is part of the onboarding process.

Additionally, employees have the right to submit grievances and concerns related to their employment or workplace conditions without fear of retaliation. VusionGroup will ensure that employees are protected from any adverse actions for exercising their rights under this policy.

## **Advocacy:**

While VusionGroup abstains from endorsing political parties or candidates, it actively supports various associations and organizations to promote open dialogue and contribute to industry advancement. VusionGroup is involved in various organizations, including industry groups, trade associations, and discussion tables at national and international levels. In some cases, to participate or join these, VusionGroup must pay a membership fee. Every participation in trade associations or joining initiatives is subject to management approval and oversight.

Examples of major associations where VusionGroup pays for its membership or makes contributions include the *Consumer Goods Forum*, the *World Economic Forum's Future of Consumption Platform* and *Perifem*.

Participation in these groups and round tables enables VusionGroup to join other industry-linked companies in engaging in advocacy efforts, to stay informed about developments and trends in the IT and Retail industry, as well as issues important to VusionGroup as a global company and employer.

These organizations often provide valuable support to their member companies through educational forums, working groups, and advocacy efforts to address and advance common concerns in the IT industry, Retail industry, or the broader business community.

Periodically, VusionGroup may engage in direct public policy, political, or legislative advocacy. Such activities specifically focus on issues directly impacting VusionGroup's business and are undertaken to promote the interests of the Group and its shareholders, without consideration for the personal preferences of individuals within the Group.

## **Scope and Applicability of the Policy**

In aligning with its commitment to advocacy, VusionGroup ensures that its governance principles extend uniformly across all aspects of the company, irrespective of geographic boundaries or operational scale. This comprehensive approach underscores VusionGroup's dedication to upholding its policies and values, which are actively communicated and adhered to by employees at every level of the organization.

## **Reporting Mechanism**

In the unlikely event that our stringent policy against political activities is breached despite the precautions outlined, employees are encouraged to use our Whistleblowing process. This reporting mechanism not only safeguards the integrity of our operations and brand but also facilitates the continuous improvement of our ethical standards.

Indeed, asking a question or reporting a concern requires courage. All VusionGroup employees are expected to speak up. When they do, they protect VusionGroup, its brand and its facilities. This helps improve its operations and prevent potential misconduct.

If you are a VusionGroup employee and you feel you need to report unethical behavior, or if you have a doubt or question, please feel free to contact:

- Any manager
- A member of the HR or Legal Department
- A member of the employee representative committee

You can also contact the whistleblower service via MyLily, your internal digital platform. There you can choose to anonymously report an unethical situation or behavior through the "Ethics" dashboard or by emailing [ethics@vusion.com](mailto:ethics@vusion.com)

If you are an external or occasional contractor of VusionGroup please email [ethics@vusion.com](mailto:ethics@vusion.com)

For additional information on the reporting mechanism at VusionGroup please read the Ethical Alert Policy.

## **Responsibilities**

ExCom is responsible for the policy's approval.

EVP ESG and SEVP Group Human Resources own, endorse and ensure the implementation of the policy.

SEVP Group Human Resources drives the implementation of the policy and provides specific advice on the issue.

Relevant group VPs, Country Managing Directors, regional and local management are responsible for ensuring that this policy is implemented and adhered to, and that all relevant employees are made aware of the policy and its requirements. They ensure local compliance with the policy including adequate control measures to eliminate or reduce risks and direct behavior in breach of the policy.

Sustainability and Legal teams advise policy owners on policy content and ensure relevant and proper communication of policy efforts to external stakeholders.

Management, employees and contract employees across VusionGroup are responsible for adhering to this policy. This means complying with the letter and spirit of the policy. They must take responsibility for ensuring that they are in line with the policy.

All incidents (perceived or actual violations of this policy or ethical concerns) will be reported without delay as set out in VusionGroup's Ethical Policy, also stated above.

Authorized by the Chief Executive Officer, VusionGroup