

Quality & CSR Policy



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1. PREAMBLE

This Quality & CSR policy reflects CODRA's ongoing commitment to excellence, continuous improvement and sustainability, in compliance with international standards and the expectations of its stakeholders.

In the remainder of this document, CODRA refers to any Group company, in France or abroad.

Commitments

CODRA recognizes the impact of its activities on society and is committed to assuming its responsibilities towards its customers, employees, subcontractors and the ecosystem in which it operates. As such, CODRA adopts a proactive approach to sustainable development, aimed at promoting social equity, economic efficiency and respect for the environment, and integrates a process of continuous improvement to meet the expectations of its stakeholders.

Committed to a Corporate Social Responsibility (CSR) approach, CODRA aspires to be a catalyst for positive change. It wishes to encourage its partners, customers, suppliers and subcontractors to adhere to and contribute to the fundamental values it upholds. CODRA Ingénierie Informatique's adhesion, in July 2025, to the United Nations Global Compact, is a sign of this commitment, aimed at aligning its strategies and practices with ten universally recognized principles in the fields of human rights, labour, environment and anti-corruption.

CODRA is committed to:

- Guaranteeing operational excellence by placing quality at the heart of its processes, products and services, in order to meet the most demanding expectations of its customers and stakeholders;
- Acting ethically and responsibly in all its activities, ensuring integrity and compliance with applicable regulations;
- Creating and maintaining a stimulating and inclusive work environment, where continuous improvement and team training are essential levers for performance and innovation;
- Actively supporting local communities and contribute to their development, while ensuring that its actions are in line with a social and societal quality approach;
- Making listening to and satisfying customers a top priority;
- Maintaining fair, transparent and sustainable relations with suppliers and partners;
- Constantly innovating to minimize its carbon footprint, by integrating sustainable practices and high-performance technologies.

This policy is reviewed by CODRA Management at least once a year, and communicated to all employees. Progress in relation to the commitments and the set of objectives is monitored by Management and the relevant activity managers, enabling the effectiveness of the actions implemented to be checked, and to ensure continuous improvement in its practices.

Eric ODDOUX
CODRA Group President

2. QUALITY POLICY

Management commitment

CODRA Management affirms its commitment to excellence and customer satisfaction. This commitment is demonstrated by:

- Compliance with applicable requirements (customer, statutory and regulatory);
- Implementing rigorous, standardized processes to ensure consistent, reliable products and services;
- The adoption of proven project management practices;
- A continuous improvement approach to respond to market trends and the needs and expectations of customers and stakeholders.

Strategic orientations and objectives

To achieve its ambitions for growth and sustainability in the industrial IT markets, CODRA has set itself the following objectives:

- **Software durability and performance:** To develop software that is ever more efficient, rich in features and in line with technological developments, while ensuring rigorous control of its design. This means guaranteeing backward compatibility, meeting high quality and security standards, and precisely meeting user expectations;
- **Digital Sovereignty:** Ensuring full control of its technologies, infrastructure and value chains, by prioritizing independent, interoperable solutions that comply with open standards;
- **Project management expertise:** Cultivate project management expertise to master development cycles and deliver projects on time and on budget;
- **Strengthening positioning:** Maintain a high level of service positioning, by being a driving force behind innovative solutions for customers. Increase market share in France and abroad, by strengthening presence and reputation in French and international markets;
- **Employee well-being:** Fostering a working environment conducive to employee well-being and fulfilment, essential to performance and innovation.

Customer satisfaction

CODRA is particularly mindful of customer satisfaction across its various activities, and to maintaining long-lasting relationships with its customers, hence is committed to:

- Providing its customers with staff best suited to their needs;
- Fulfilling its commitments, particularly with regards to compliance to specifications and product quality;
- Providing customers with responsive support and appropriate training.

Customer satisfaction is regularly measured through surveys to identify areas of improvement.

ISO 9001 certification

CODRA's ongoing commitment to process improvement, customer and stakeholder satisfaction, and employee development has been reflected in the ISO 9001 certification of its French subsidiary, CODRA Ingénierie Informatique, since 1998. It is planned to extend this certification to all subsidiaries by 2027.

3. SOCIAL POLICY

CODRA recognizes that its employees are essential to its success, and is committed to creating a safe, tolerant working environment where each individual can flourish, develop his or her skills and maintain a healthy work-life balance.

Working conditions and social dialogue

CODRA is committed to guaranteeing the fundamental rights of its employees. In particular, it recognizes and respects freedom of association and the right to form trade unions or to set up staff representation bodies, in accordance with the laws and regulations in force. It fosters constructive and regular social dialogue with employee representatives in order to promote a harmonious and productive working environment.

To ensure the well-being of its employees, CODRA offers suitable working conditions: flexible working hours and homeworking, enabling everyone to better reconcile their professional and personal lives, as well as providing modern, comfortable offices and practical tools.

Employee health and safety

CODRA complies strictly with current occupational health and safety regulations, ensuring a safe and healthy working environment for all its employees. It implements occupational risk prevention programs and provides safety training.

By 2026, the objective is to maintain the number of lost-time accidents at zero.

Diversity, professional equality, combating discrimination and harassment and sexist behaviour

CODRA is committed to combating all forms of discrimination, whether based on origin, sex, morals, sexual orientation, gender identity, age, family situation, ethnicity, political opinions, trade union activities, religious beliefs, physical appearance, state of health, disability or any other discriminatory criteria. CODRA also undertakes to prevent and address any situation of harassment, as well as any sexist behaviour, and actively protects its staff from any conduct that creates an offensive or hostile working environment.

To reinforce this approach, CODRA aims to have 100% of its business managers trained in the prevention and management of harassment and sexist behaviour by the end of 2026.

In addition, CODRA pays particular attention to professional equality between women and men and continues its actions to reduce, by 2029, the identified pay gaps and to promote greater representation of women among the highest-paid employees, in accordance with the action plan established under the professional equality index.

Skills development

CODRA promotes access to ongoing training, which is essential both for the personal development of employees and for the quality of the services offered to customers. It is committed to supporting its employees in their professional development by offering opportunities for training and growth within the company.

In addition, and being aware of the importance of onboarding, CODRA – whose workforce has been growing for several years and plans to pursue this momentum in the coming years – places particular emphasis on supporting its new talent. Onboarding is facilitated by apprenticeship programs, enabling the transfer of know-how and a rapid immersion in the company's culture and values.

4. ENVIRONMENTAL POLICY

CODRA is committed to complying with all applicable environmental legislation and to adopting a responsible approach aimed at reducing its carbon footprint and acting positively for the environment.

Controlling consumption and GHG emissions

The use of energy and water in buildings and processes is optimized to minimize the consumption of natural resources. Wherever possible, the procurement and promotion of environmentally-friendly products and services are given priority.

In 2025, CODRA carried out an initial assessment of its greenhouse gas (GHG) emissions, which will serve as a basis in 2026 for defining actions to control and limit its environmental impacts, taking into account its operational constraints, in particular those related to the development of its activities.

CODRA also supports its customers (public and private) in their policy of optimizing their consumption. The Panorama Suite platform, developed by CODRA, enables the measurement of consumption, the identification of deviations and applies optimisation instructions to users.

Sustainable IT

CODRA integrates sustainable IT at all levels of its activities, combining software eco-design and operational best practices:

- For its products: optimized code (event-driven processing, intelligent caching), shared cloud infrastructures and simple development rules (eliminating unnecessary variables, reducing network traffic);
- For its organization: reuse of hardware, and team awareness of responsible practices (limited storage, lighter messaging, etc.).

Waste management

Waste is reduced by evaluating and optimizing operations for maximum efficiency. CODRA works with specialized companies to collect and recycle electrical and electronic equipment (WEEE). In 2026, CODRA maintains the objective of ensuring that 100% of its WEEE is recycled through an appropriate channel.

Sustainable transport

The vehicle fleet is selected according to strict CO₂ emission criteria, in order to give preference to more environmentally-friendly vehicles. Thus, the partial renewal of the fleet in 2025 focused on hybrid vehicles, aimed at reducing GHG emissions; this objective will continue to be pursued over the coming years.

To further limit its carbon footprint, the internal policy encourages:

- Low-carbon travel (train, public transport) whenever possible, rather than planes or private cars;
- Homeworking and videoconferencing, reducing business travel while maintaining collaborative efficiency.

Awareness

CODRA raises employee awareness of environmental issues and encourages them to adopt responsible behaviours.

5. SUSTAINABLE PURCHASING

As a company conscious of its impact, CODRA considers that its purchasing and subcontracting choices are not limited to a simple commercial transaction, but reflect its values and long-term vision. CODRA is committed to responsible purchasing practices.

By choosing suppliers who respect human rights, environmental standards and ethical business practices, CODRA aims to play an active part in building a fairer, greener economy. This includes promoting fair working conditions, reducing carbon footprint, and supporting local economies, in particular by prioritising, whenever possible, partnerships with local suppliers, and by favouring purchasing practices that contribute to the inclusion of people with disabilities.

Supplier selection

Suppliers are selected according to rigorous, objective criteria, including quality and technical excellence. As part of its responsible purchasing approach, CODRA also takes into account, where relevant, social, environmental and ethical criteria.

In addition, CSR clauses are included in contracts with subcontractors in order to formalise commitments relating to human rights and working conditions, environmental protection, and business ethics (in particular anti-corruption).

Transparency

CODRA is committed to transparency in its purchasing processes, respecting the principles of fair competition and ensuring that purchasing decisions are based upon objective and ethical criteria.

CODRA strives to establish transparent and fair contracts with its suppliers, and ensures that it strictly adheres to agreed payment terms.

6. ETHICS POLICY (ANTI-CORRUPTION)

CODRA is committed to conducting all its activities with honesty, integrity and transparency, and to complying with all applicable anti-corruption laws and regulations, fraud and conflicts of interest. CODRA's Management greatly respects the importance of maintaining an ethical working environment and to acting in a cordial manner with all its stakeholders.

CODRA encourages a culture of accountability and the reporting of suspicious behaviour, while protecting whistle-blowers from any form of reprisal.

A corruption risk map has been drawn up to identify the activities most at risk, and to implement appropriate preventive measures.

Principles

The awarding, negotiation and operation of public or private contracts must not give rise to behaviour or facts that could be qualified as active or passive corruption, or complicity in influence peddling or favouritism. Bribery of foreign public officials in international business transactions is strictly prohibited.

Gifts and benefits may only be offered or accepted on condition that their value is symbolic or low, that they are given only occasionally, and that they do not call into question the integrity or impartiality of the parties concerned. It is strictly forbidden to offer, promise, give, solicit or accept bribes in any form whatsoever. Employees are invited to refer to the Anti-Corruption Charter for detailed guidelines.

Employees must avoid any situation likely to create a conflict of interest, and report to Management any potential or actual conflict.

CODRA prohibits all forms of fraud, including the falsification of documents or information, false statements, misappropriation or improper appropriation of assets (tangible or intangible), as well as any act aimed at obtaining an undue advantage. Any suspicion of fraud must be reported in accordance with the whistle-blowing system.

CODRA ensures that its partners, customers and suppliers share the same values and are equally committed to the fight against corruption.

Training and awareness-raising

CODRA aims, by the end of 2026, to train 100% of the employees most exposed to the risks of corruption and to raise awareness among all its staff.

Employees can consult the Compliance Officer if they have any doubts about how to deal with a potentially risky or ambiguous situation.

Whistle-blowing system

Employees and stakeholders (in particular suppliers and customers) are encouraged to report any behaviour or practice that is inappropriate, contrary to current laws and regulations, or to the principles set out in this policy and the internal charter. A procedure for collecting and handling ethical alerts, and a dedicated e-mail address - compliance@codra.fr - have been set up for this purpose.

CODRA is committed to protecting employees who report suspicions of corruption in good faith from any form of reprisal, even if this information proves to be false or inaccurate.

Any failure to comply with the above provisions will be thoroughly investigated, and appropriate disciplinary action will be taken if necessary.

CODRA's Management, applying a zero-tolerance policy towards corruption and fraud, maintains for 2026 the objective of recording no proven cases of corruption or fraud within the company.

7. PROTECTION OF PERSONAL DATA

CODRA places respect for privacy and the protection of personal data at the heart of its commitments. As part of its activities, it implements personal data processing and ensures that every piece of data collected is handled fairly, transparently and securely, in compliance with the General Data Protection Regulation (GDPR) and current legislation.

Collection and processing principles

Personal data is collected solely for specific, explicit and legitimate purposes. They are kept for a period of time proportionate to requirements and their use is limited to what is strictly necessary.

Security and confidentiality

CODRA implements appropriate organizational and technical measures to guarantee the confidentiality, integrity and availability of the data collected. CODRA ensures that only authorized persons have access to data within the scope of their duties, and demands the same level of security from its partners and subcontractors.

Data collected is not shared with any third parties for commercial purposes and is hosted in France.

Individual rights

Each data subject has recognized rights, including the right to access, rectify, object to processing, request erasure, or its portability.

A dedicated point of contact (DPO - Data Protection Officer) has been identified to facilitate the exercise of these rights and to provide a transparent response to requests, within a maximum of one month of receipt. Requests should be sent by e-mail to codra-dpo@codra.fr or by post to: CODRA - for the attention of the DPO - 2 rue Christophe Colomb - CS 0851 - 91300 Massy - France.

8. INFORMATION SYSTEMS SECURITY

Information systems security is a strategic issue for CODRA. It aims to protect all infrastructure, applications and data against any form of threat, whether accidental or malicious.

Protection measures

CODRA implements robust technical and organizational measures: secure networks and workstations, rigorous access control, encryption of sensitive data, system monitoring and backup and continuity plans in the event of an incident.

Cybersecurity culture

Protecting information is everyone's responsibility. That's why employees are regularly made aware of good IT security practices and the actions to make in the face of cyberthreats, in order to actively contribute to securing systems and data. This awareness-raising relies in particular on internal communication initiatives as well as phishing simulation campaigns aimed at strengthening vigilance. It is complemented by regular penetration tests to identify and remediate system vulnerabilities.

At CODRA, this culture of cybersecurity is also anchored in engineering and product development activities. In particular, the security of monitoring systems is a strategic priority, integrated right from the design stage (secure by design) and supported by a continuous improvement approach. This approach has enabled Panorama E2 to obtain, in 2019, CSPN Certification (First-Level Security Certification) issued by ANSSI (French National Agency for the Security of Information Systems), thus becoming the first certified SCADA platform to do so. This was further confirmed by ANSSI Qualification of the Panorama monitoring software in 2020, and renewed in 2023. These certifications are a guarantee of robustness and reliability for users of Panorama.

Incident management

Procedures are in place to manage and respond to security incidents in order to minimize their impact on CODRA's activities and customers.

Any employee or stakeholder is encouraged to report without delay any security incident, suspected incident, or detected vulnerability to the CISO at: codra-rssi@codra.net, or via the Panorama CSIRT (Computer Security Incident Response Team): <https://my.codra.net/fr-fr/csirt>

CODRA