



SHIPPEO

ETHICS CHARTER OF SHIPPEO

Executive Summary

Our Commitment to Excellence and Responsibility

At Shippeo, we believe in the power of ambition, care, collaboration, and delivering excellence. These values form the heart of our commitment to responsible and ethical business practices, and they are the essence of who we are.

This Ethics Charter isn't just a rulebook; it's a roadmap for creating a better future—one built on trust, transparency, and sustainability.

By embracing these principles, we're a community of individuals dedicated to shaping a future based on trust, ethics, and responsible business practices.

Accountability and Governance

Shippeo places a strong emphasis on accountability and governance to ensure the effective implementation of our Ethics Charter. The responsibility for upholding and monitoring the commitments outlined in this charter rests with the Shippeo CSR Committee (csr@shippeo.com) and our Legal Team (legal@shippeo.com). These dedicated teams are entrusted with overseeing compliance, addressing concerns, and continuously improving our ethical practices.

To foster transparency, Shippeo's Ethics Charter undergoes an annual review, during which adjustments are made to reflect evolving standards and commitments. We embrace a culture of openness, sharing this charter with all employees through our internal knowledge system. Any updates or new versions will be promptly communicated to employees to keep everyone informed.

In our commitment to ensuring that every team member is acquainted with our ethical standards, starting from 2024, we will systematically track the completion of reading and agreement through our internal learning management system, "Shippeo Academy." Acknowledgment of this charter will be mandatory for all employees, reinforcing our collective responsibility to uphold the values and principles set forth in this charter.



Content

EXECUTIVE SUMMARY

OUR COMMITMENT TO EXCELLENCE AND RESPONSIBILITY

ACCOUNTABILITY AND GOVERNANCE

CONTENT

INTRODUCTION

- Background and Purpose
- Scope of the Ethics Charter
- Commitment to Ethical Conduct

IN GENERAL: CORE VALUES AND PRINCIPLES

- Integrity
- Transparency
- Applicable Laws And Regulations
- Accountability
- Respect For Individuals
- Innovation For Responsibility
- International Standards
- Monitoring And Enforcement
- Reporting Mechanisms

UPHOLDING DIGNITY AND EQUALITY

- OUR COMMITMENT TO DIVERSITY
- EMPOWERING EMPLOYEES' RIGHTS
- NO HARASSMENT
- CHILDREN'S RIGHTS
- FAIR WAGES
- HEALTH & SAFETY
- WORK-LIFE BALANCE

BUSINESS ETHICS

BRIBERY

COMPETITION

FINANCIAL INTEGRITY AND CONFIDENTIALITY

CONFLICTS OF INTEREST

RESPONSIBLE SOURCING

DATA PRIVACY: SAFEGUARDING INFORMATION IN THE DIGITAL AGE

COMPLIANCE WITH DATA PROTECTION REGULATIONS

DATA CONFIDENTIALITY AND SECURITY

SECURITY AND INFORMATION SYSTEMS

RESPECT FOR PROPERTY RIGHTS

STAKEHOLDER RELATIONS

ENGAGEMENT WITH EMPLOYEES

EMPLOYEE CONCERN MECHANISMS

ENGAGEMENT WITH SHAREHOLDERS

CONCLUSION

EVOLUTION OF THE ETHICS CHARTER

Introduction

Background And Purpose

SHIPPEO recognizes the importance of ethical conduct in the rapidly evolving tech industry.

This Ethics Charter outlines our commitment to maintaining the highest standards of integrity, transparency, and responsibility in all aspects of our operations.

Scope of the Ethics Charter

This charter applies to all employees, contractors and partners associated with SHIPPEO.

Commitment to Ethical Conduct

SHIPPEO is dedicated to upholding ethical principles in every decision and action, fostering trust among our employees, customers, and the broader community.



Accountability

SHIPPEO holds itself accountable for the impact of its decisions on the environment, society, and individuals. We acknowledge responsibility for our actions and actively seek to address any negative consequences.



Respect for Individuals

We celebrate diversity and foster an inclusive environment that respects the dignity and rights of every individual. Discrimination, harassment, and unfair treatment have no place in our company.



Innovation with Responsibility

While pursuing technological advancements, SHIPPEO is committed to ensuring that innovation aligns with ethical principles. We prioritize the development and deployment of technologies that benefit society as a whole.



International Standards

In addition to legal requirements, we commit to aligning our practices with internationally recognized ethical standards and guidelines.



Monitoring Enforcement

SHIPPEO will establish mechanisms to monitor compliance with laws and ethical standards, with appropriate enforcement measures in place.



Reporting Mechanisms

We encourage employees and stakeholders to report any suspected legal or ethical violations through established reporting channels. Whistleblowers will be protected from retaliation.

In general: Core Values and Principles



Integrity

SHIPPEO commits to honesty and fairness in all interactions, both internally and externally. We strive to build trust through consistency in our words and actions.



Transparency

We value open communication and will provide clear and accurate information to our stakeholders, promoting a culture of transparency that extends to our products, services, and business practices.



Applicable Laws and Regulations

SHIPPEO will comply with all applicable laws and regulations governing its operations.

Upholding Dignity and Equality

Our Commitment to Diversity

At Shippeo, we're passionate about diversity and inclusion. We pledge to eliminate all forms of discrimination, whether blatant or subtle. We value and respect every individual, regardless of their age, race, marital status, disability, nationality, sexual orientation, ethnicity, religion, or gender.

Our commitment to zero discrimination doesn't end with hiring; it's a promise that lasts throughout your journey with Shippeo.



Our Actions

● Foster accessibility:

We are committed to fostering an inclusive workplace by offering tailored accommodations and have nominated a dedicated Disability Advisor whose role is to support candidates or employees with disabilities, ensuring an environment where everyone can thrive

● Foster Gender equity:

- Equal treatment in accessing training and career advancement
- Equal treatment on compensation with benchmark-based salary grid, annual increases based on performance, implementation of a dedicated control on equal pay for men and women in equal positions for annual increases
- Supporting mothers returning from maternity leave: women returning from maternity leave or on maternity leave are considered in the annual increase exercise and can benefit from flexibility in the organization of their working hours

● Foster Belonging and Inclusion

We organize regular "Talk2Connect" sessions internally to raise awareness around diversity (starting Q4 2023)

Empowering Employees' Rights

We're tenacious advocates of employee rights. Whether it's the freedom to associate, engage in collective bargaining, or move freely, we're dedicated to upholding these rights. All terms and conditions must be crystal clear and timely and fair compensation is non-negotiable.

Our Actions

● Every 5 years, we elect employee representatives as part of our Social & Economic Committee "CSE"

- CSE serves as a staff representative body responsible for presenting individual and collective concerns to the management, advocating for employee welfare, and promoting health and safety in the workplace.
- Monthly meetings with the management provide employees with the opportunity to submit questions and concerns in advance, and a subsequent report is shared to keep the workforce informed.

No Harassment

At the heart of the Shippeo organization and its working approach is a concern for the Individual. We take the well-being of our employees to heart. Harassment, whether physical, psychological, or sexual, has no place at Shippeo.

We ensure that every employee feels safe, respected, and valued. It's not just a policy; it's a commitment to fostering a culture of fairness, trust, and unity.



Our Actions

- In accordance with applicable law, Shippeo has implemented measures to prevent and punish harassment at work.
- Two contact persons have been appointed (i) within the employees' elected workers council ("CSE") and (ii) among the employees in order to provide guidance, information and support to the employees who are victims of harassment and bullying. These representatives can be contacted simply. Their contact details have been communicated to all employees and their rights are set out in an easily accessible internal memo.
- If a situation of harassment is proven, Shippeo will take the appropriate disciplinary measures, in accordance with the applicable law.

Children's Rights

We're committed to upholding the rights of children as outlined in the Convention on the Rights of the Child. Child labour is never an option.

We adhere to the minimum age for employment, which should allow children to complete their compulsory schooling.

Our Actions

- Our contracts with customers and suppliers include explicit clauses addressing the prohibition of child labour, underscoring our commitment to ethical business practices and the prohibition of any involvement with child labour in our supply chain.

Fair Wages

We are dedicated to providing our employees with fair wages for the work performed. This includes respecting the legal minimum wage set in the country of operation. If there is no legal minimum wage or if it doesn't meet the minimum subsistence level, we engage to pay employees a wage sufficient to ensure a decent standard of living and meet the basic needs of employees and their families.

Our Actions

- We review annually our salary grid based on external benchmark tools to make sure we offer attractive compensation to our employees

Health & Safety

Shippeo is responsible for providing a safe and healthy working environment for all employees. This entails maintaining the highest standards of physical, mental, and social well-being through preventive measures, training, communication, and the establishment of worker health and safety committees.

Shippeo also adheres to applicable health and safety laws and develops policies for occupational health, safety, and risk prevention in the workplace.

Our Actions

- We have implemented Health and safety protocols for our offices (2023)
- We provide Health recommendations for employees working remotely
- We conduct an annual Engagement & Satisfaction Survey, encompassing comprehensive assessments of workload and mental health, reflecting our dedication to understanding and prioritizing the well-being of our employees.
- We conduct regular fire drills and safety trainings with our employees to ensure everyone is well-prepared and informed in case of emergencies

Work-Life Balance

At Shippeo, we're dedicated to ensuring that our employees have a healthy work-life balance. We encourage open dialogue to accommodate personal and professional responsibilities.

Our employees' well-being is our concern, and our work environment is built on genuine care for every individual.

Our Actions

- Work-life balance assessment twice a year through our annual Engagement & Satisfaction Survey
- Dedicated work-life balance review twice a year during the bi-yearly reviews
- Working hours tracked into our HRIS
- Managers trained on work-life balance and psychosocial risks (starting Q4 2023)



Business Ethics

At Shippeo, we are committed to conducting our business with unwavering integrity and fairness. By fostering a culture of integrity and ethical behaviour, we collectively contribute to a business environment founded on trust, transparency, and responsible conduct.

Bribery

At Shippeo, there's no room for bribery in any shape or form, regardless of the circumstances. We unwaveringly adhere to the highest ethical standards and firmly reject any involvement in bribery. This means we never accept, request, practice, make, offer, promise, or authorize any form of bribery, whether monetary or otherwise.

Our commitment to zero tolerance for bribery is not just a policy—it's a core value that guides our actions, strengthens our reputation, and underscores our dedication to conducting business with integrity.

Our Actions:

- In accordance with applicable law, we have implemented measures to prevent and punish bribery. The procedure is detailed in the Shippeo anti-corruption guide.
- If a situation of bribery is proven, Shippeo will take the appropriate disciplinary measures, in accordance with the applicable law.





Competition

At Shippeo, we champion the values of fairness, transparency, and competition in the marketplace. We firmly believe that these principles are essential for building a sustainable, thriving business environment. To support these values, we pledge to never engage in practices like price-fixing or any actions that hinder fair competition.

Our commitment to fair and transparent competition extends not only to our internal operations but also to our relationships with suppliers, partners, and the wider business community.

Our Actions:

- We collect information about our competitors only by transparent and legal means.
- We notify our Legal Department of any meetings with our competitors or before taking any action that could prevent a company from buying from or selling to one of our competitors.
- We never interfere directly or indirectly with our competitors' pricing policies.
- We do not disparage our competitors

Financial Integrity and Confidentiality

Transparency is the foundation of our financial activities at Shippeo. We meticulously adhere to local legislation, ensuring that our financial records are not only accurate but also a reflection of our commitment to ethical financial practices. We hold the highest regard for financial integrity, and this extends to our commitment to prevent and prohibit money laundering in any form.

All professional, commercial, and financial information related to Shippeo is treated with the utmost confidentiality, underscoring our dedication to maintaining trust and privacy.

Conflicts of Interest

Our commitment to ethical conduct extends to making decisions in the best interests of Shippeo. We are dedicated to avoiding situations where conflicts of interest may arise, potentially compromising our commitment to the organization. Every stakeholder, from employees to partners, is expected to comply with this requirement.

Our Actions:

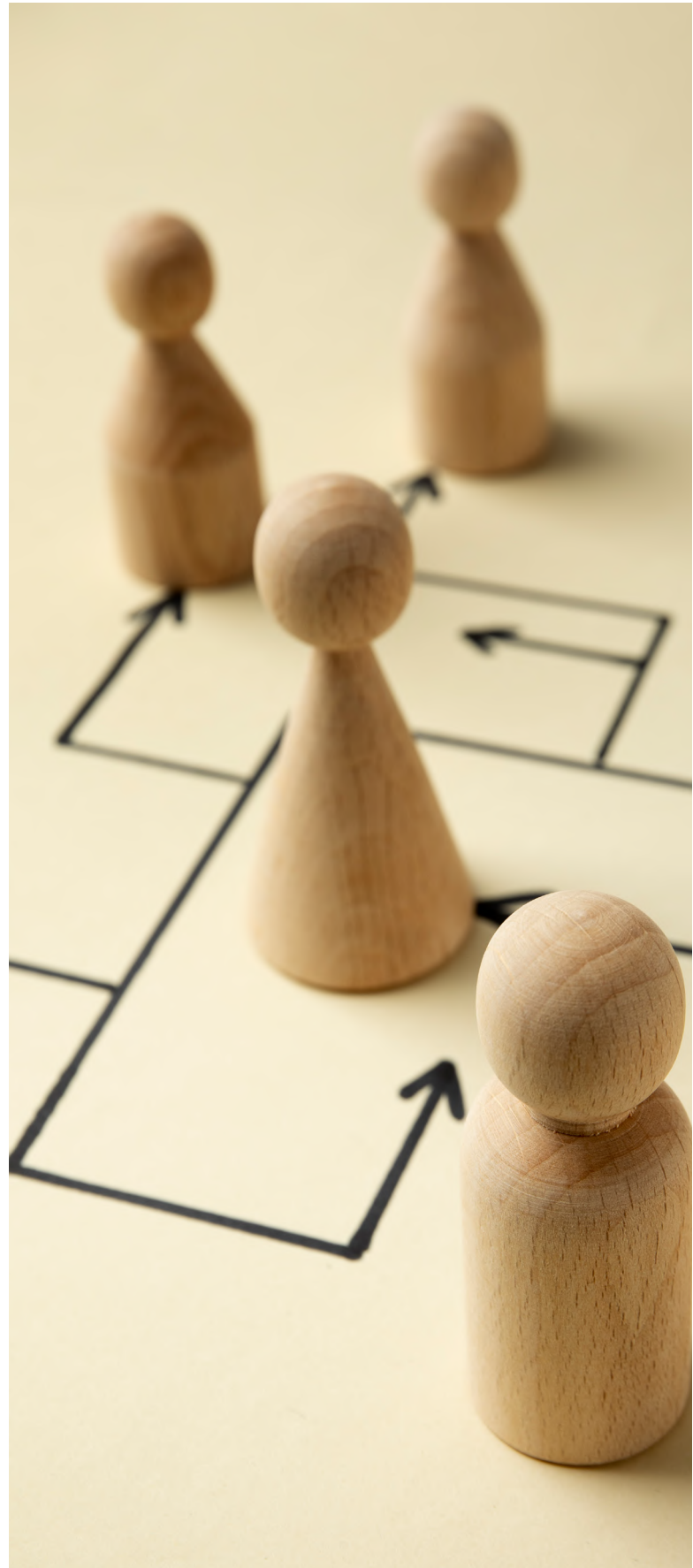
- We strongly encourage all stakeholders to cooperate with us in ensuring ethical conduct throughout Shippeo. Should any stakeholder perceive a potential conflict of interest, we urge them to promptly inform Shippeo. This proactive approach helps us maintain trust and transparency within the organization.
- Our supplier code of conduct includes a dedicated section on the prevention of conflicts of interest

Responsible Sourcing

We recognize our responsibility to contribute positively to the communities and environments from which we source our products and services. This approach reflects our spirit of leaving a positive impact wherever we operate.

Our Actions:

- We conduct annual audits of our office-related suppliers to ensure their adherence to sustainable practices



Data Privacy: Safeguarding Information in the Digital Age

At Shippeo, we are aware of the critical importance of data privacy and security in our rapidly evolving digital landscape. We hold a deep commitment to the protection of personal and sensitive information belonging to our customers, employees, and all stakeholders. In an era where data is a valuable asset, expect our stakeholders to maintain the highest standards of data protection and privacy.

Data Confidentiality and Security

We take comprehensive precautions, both in terms of technical and organizational measures, to uphold the confidentiality and security of personal data belonging to Shippeo. This includes measures to prevent data distortion, damage, or unauthorized access by third parties.

Compliance with Data Protection Regulations

We have a responsibility to ensure that everyone's right to privacy is respected. The way we collect, store and use personal data is an important factor in maintaining the trust of our stakeholders.

We therefore ensure to fully comply with obligations arising from current European regulations, notably the European Union (EU) Directive 95/46/EC and the EU General Data Protection Regulation (GDPR). We also adhere to any relevant local laws and regulations governing the collection, processing, and utilization of individual personal data. This compliance implies:

Our Actions:

- Ensuring that individuals whose personal data we have collected personal data are informed about the type of information we collect, how we intend to use it with whom we may share it and who they can contact if they have any questions;
- Collecting only relevant and necessary personal data, and ensuring their complete security;
- Ensuring that third parties from whom we obtain or collect, store or use personal data on our behalf share our data protection standards. We don't collect any personal data that is considered "sensitive" in the sense of GDPR unless we are compelled to do so by a legal obligation, or only with the prior consent of the data subject.



Respect for Property Rights

We condemn counterfeiting and all forms of unfair competition which prevent healthy competition and the normal development of the market.

We commit to promoting the respect of both physical and intellectual property rights. This involves a commitment to not infringe upon the intellectual property rights of third parties, such as patents, trade secrets, trademarks, copyrights, and other proprietary information.

By adhering to these principles, we collectively reaffirm our commitment to responsible data handling, trust, and transparency, ensuring the privacy and security of information in our digital age. This commitment strengthens the trust of our customers and suppliers and upholds our dedication to ethical business practices.

Security and Information Systems

We exercise due care and diligence to ensure that all applicable security and information system security requirements are met. This includes the protection of key assets, both tangible and intangible. Information should be managed and hosted at the appropriate security levels. It must not be used for any purpose other than the specific business purpose for which it was provided, and it should be handled according to the terms of its disclosure.

Our Actions:

- As part of this commitment, we are actively working towards obtaining ISO 27001 certification (year 2024), a globally recognized standard for information security management systems. This certification reflects our dedication to protecting sensitive information and maintaining the utmost confidentiality for our customers, employees, and stakeholders. By pursuing ISO 27001 certification, we aim to strengthen our information security practices and demonstrate our ongoing commitment to excellence in safeguarding data in our rapidly evolving digital landscape.



Stakeholder Relations

At Shippeo, we firmly believe that mutual respect, transparent behaviour, and open dialogue are the cornerstones of building strong and trusting relationships with the diverse stakeholders we interact with.

Engagement with Employees

Active engagement with our employees is a core principle at Shippeo. We are committed to fostering open and transparent social dialogue with our workforce, especially with employees and their representatives.

By maintaining continuous, constructive communication, we can ensure fair labour practices, build a workplace that prioritizes the well-being of our employees, and nurture a culture of trust and respect. We believe that an engaged workforce is the base of our success.

Our Actions:

- Regular employee feedback sessions: Annual Engagement & Satisfaction Survey, bi-annual reviews
- Employee Representative involvement in decision-making processes
- Transparent communication channel with bi-monthly all-hands meetings
- Training and development opportunities: Learning Management System "Shippeo Academy", internal mobility policy
- Work-Life balance Initiatives (see above), including flexible work arrangements and remote work options
- Diversity and Inclusion practices (see above)

Employee Concern Mechanisms

In line with our values, we provide effective mechanisms for raising legal or ethical issues or concerns. It's essential that employees can voice their worries without fear of retaliation. As a responsible company, we take proactive measures to prevent, detect, and rectify any punitive actions, demonstrating our commitment to a safe and ethical work environment.

Our Actions:

- Following each all-hands meeting, employees have the opportunity to submit questions and comments through an online questionnaire, whether anonymously or not. Shippeo commits to address all submitted questions during the following all-hands meeting.
- We conduct annual Engagement & Satisfaction Surveys for all employees
- We have implemented whistleblower policies

Engagement with Shareholders

Transparency is key in our stakeholder relations. We maintain an open and candid dialogue with our shareholders, providing them with information about our activities, objectives, and performance. This exchange of information occurs without prejudice to any other applicable provisions, further emphasizing our commitment to transparent and ethical business practices.

Our Actions:

- We conduct regular shareholder meetings to provide updates on company activities, discuss objectives, and share performance metrics, fostering an ongoing and transparent dialogue.
- We provide comprehensive and easily understandable financial reports, including key performance indicators, financial statements, and analyses to keep shareholders informed about the company's financial health

Conclusion

Shippeo's Company Ethics Charter stands as a testament to our unwavering dedication to excellence in all facets of our operations. It serves as a blueprint for ethical, responsible, and sustainable business practices that we hold dear.

Our commitment to integrity, fairness, and transparency, as outlined within this code, not only supports our values but also strengthens the trust and partnerships we share with our valued stakeholders.

We believe that by working collectively to maintain the highest standards of ethical conduct, we contribute to a brighter, more responsible, and sustainable future.

Evolution of the Ethics Charter

This Ethics Charter is a living document that will be reviewed and updated periodically to reflect changes in technology, societal expectations, and ethical standards. We invite feedback from all stakeholders to contribute to the ongoing improvement of our ethical practices.



Pierre Khoury, CEO



Lucien Besse, COO