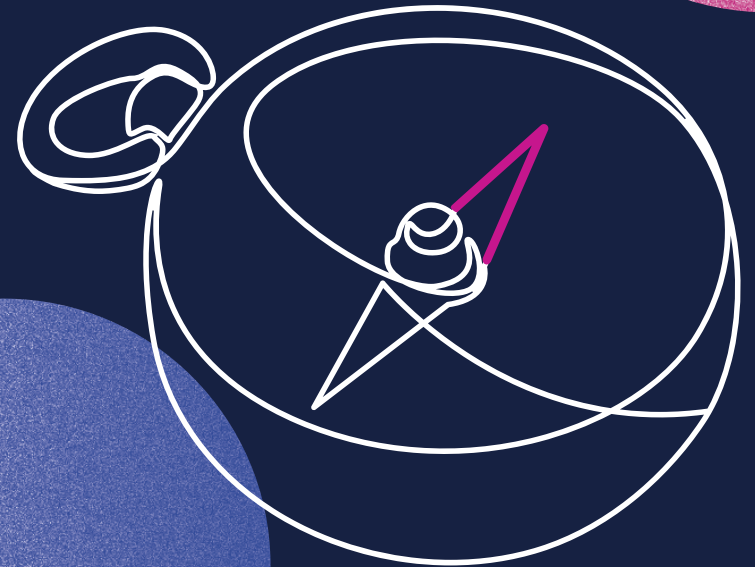


# CODE OF ETHICS AND BUSINESS CONDUCT

## WORKING TOGETHER

OUR VALUES, ETHICAL PRINCIPLES,  
AND EXPECTED BEHAVIORS



# 01

## A Message from Our CEO

Dear Colleagues,

Over the years, Planisware was always proud to be a leader of the Project and Portfolio Management (PPM) solutions that are trusted by leading companies in their industrial sectors and around the world. Such leadership is driven by our culture of commitment to our customers, colleagues, suppliers, shareholders, external organizations, and the wider community.

At Planisware, we live and work with a set of principles: earn the trust of our stakeholders, make our customers' vision a reality, bring innovation to market and build a highly principled community of Planisware colleagues.

We always pride ourselves for being a values-driven company and conducting our operations with honesty, integrity, and having the highest ethical standards in all areas of our business. As each of our stakeholders expects us to conduct our business in a completely ethical manner,

I am pleased to share with you our Planisware Code of Ethics and Business Conduct.

As such, Planisware is committed to an ethical behavior inside and outside the company, towards all our stakeholders whether they are employees, managers, trainees, or shareholders, partners or clients. We believe that each of you is an actor of a safer and compliant environment, and we count on each of you to share our beliefs and guiding principles.

Thank you for the value you bring to Planisware every day and for your commitment to upholding our high standards of ethical business practices.

*Loïc Santour,*

Chief Executive Officer,  
Planisware Group



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# Our Code

It is Planisware's desire to be a good "corporate citizen" not only by complying with applicable laws but also by holding itself to the highest ethical standards.

Our Code is our guide. It will help you live with our purpose, values, guiding principles and behaviors and keep them at the heart of your everyday work with Planisware.

## Who Is Required to Follow Our Code?

To obtain the best ethical environment, we need everyone to follow our Code.

No illegal or unethical conduct will be tolerated.

And by everyone, we mean all Planisware stakeholders such as: directors, officers, employees (whether permanent or temporary), trainees, contractors, but also shareholders, partners and clients.

## What Does Our Code Mean for You?

Everyone is expected to be fully aware and comply with our Code. This implies that you read, understand, and comply with our policies, laws, and applicable regulations and to seek guidance when it's not so clear.

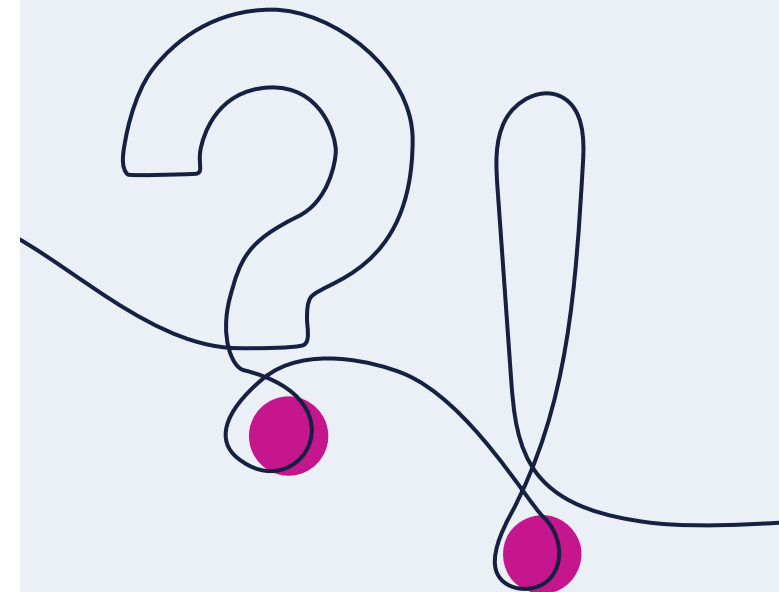
### Here are some advice to implement the Code:

- Make the principles your own.
- Lead by example, always acting with honesty and integrity.
- Take prompt actions regarding the raised issues and questions and redirect to the right people who can help.
- Don't hesitate to ask for advice or support in case of questions.

## What If Our Code Is Violated

Our values will be threatened, our reputation will be harmed, and our customers' and partners' trust will be weakened.

Any conduct violating the Code, the law or Planisware policies may lead to disciplinary action, up to and including termination of employment.





# Our People

Planisware strives to provide a work environment that is diverse, inclusive, respectful, free of discrimination and unlawful harassment, and provides equal opportunity to all employees.

Planisware expects its employees to use good judgment and hold themselves up to the high standards of integrity, professionalism, respectfulness, and conduct - both in and out of the workplace.

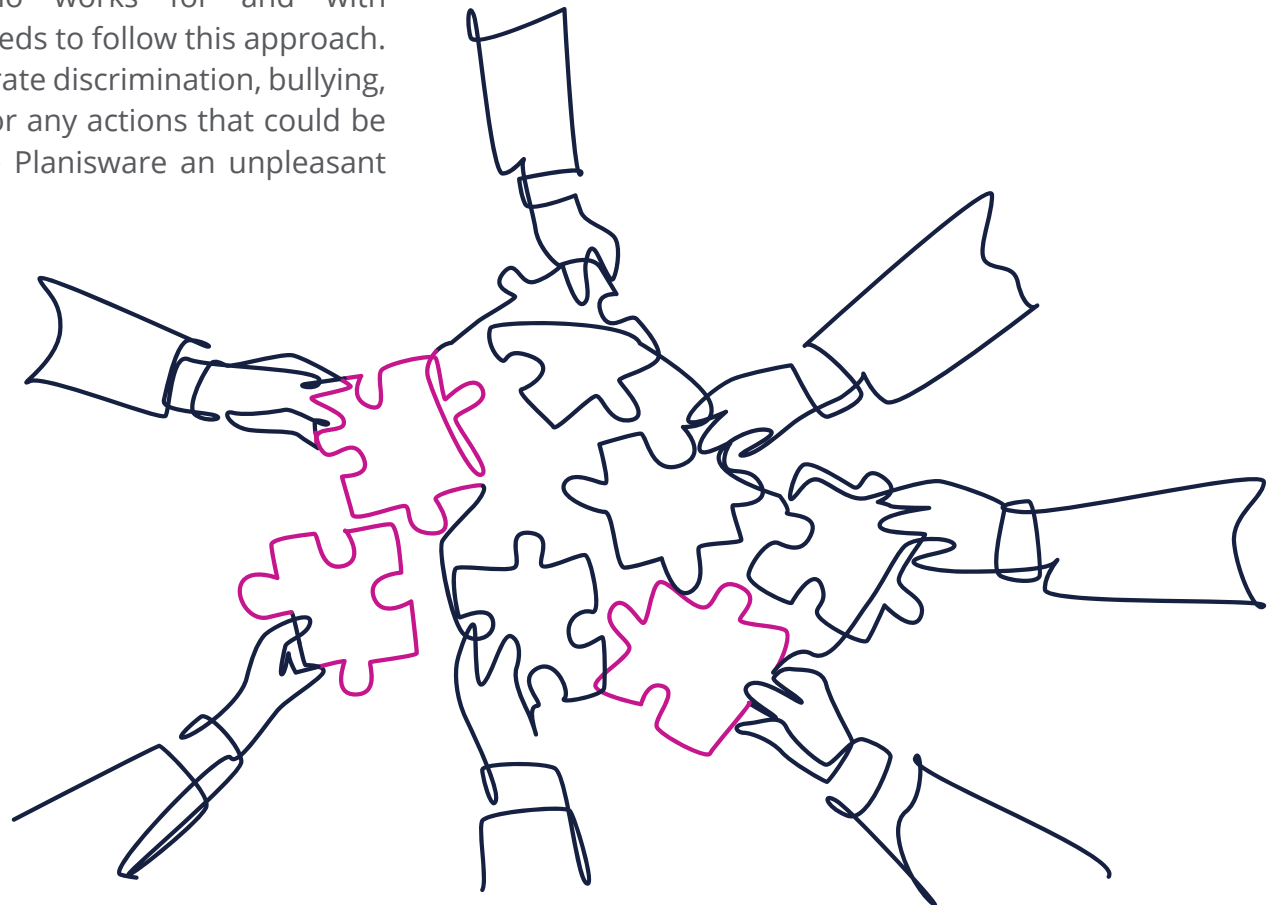
# We Are All Equal

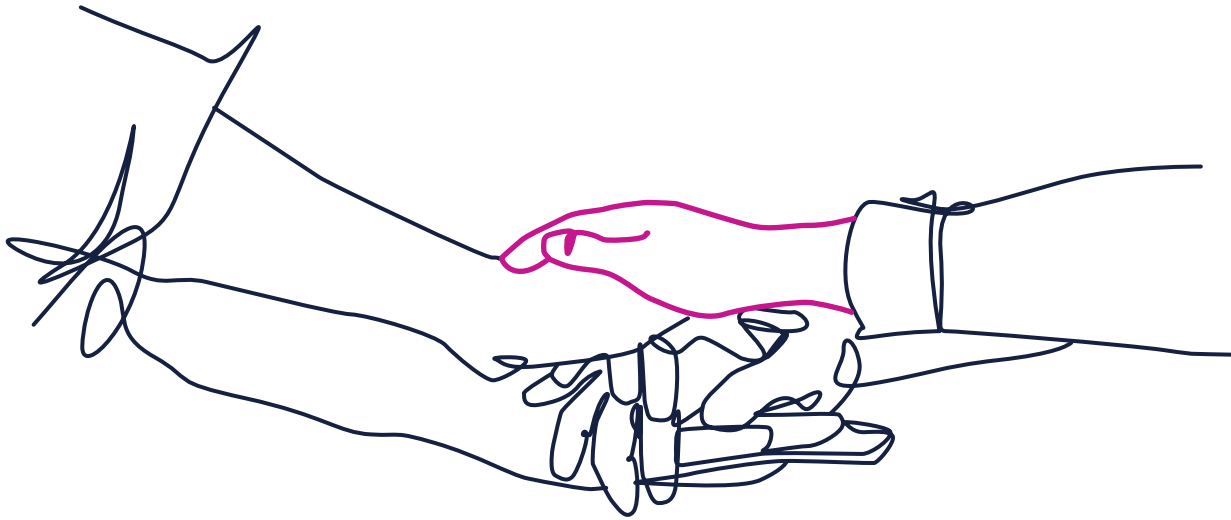
We believe that each human life is of an equal value and should be treated with respect and dignity.

Planisware is an Equal Opportunity Employer, which means we do our best to be fair and treat people in the right way. This means that job applicants, employees, suppliers, and clients will be treated fairly, and we won't treat anyone differently because of their race, religion or belief, age, disability including mental

health, gender reassignment, marriage and civil partnership, pregnancy and maternity, sex, sexual orientation and any other characteristic unrelated to job requirements.

Everyone who works for and with Planisware needs to follow this approach. We won't tolerate discrimination, bullying, harassment, or any actions that could be seen to make Planisware an unpleasant place to work.





## Anti-Discrimination, Anti-Harassment & Bullying

We want our work environment to be free from harassment or bullying. We all are responsible for making this happen and being aware of how our words, actions and behavior can be perceived by others.

Planisware does not tolerate any form of harassment, moral or sexual, no matter whether perpetrated at the work place or outside of work, including during work events.

These behaviors are considered as highly offensive for the dignity of the victim, due to their humiliating or degrading nature, and is likely to create an intimidating and hostile situation.

The general rule of thumb is, if a reasonable member of the team wouldn't like what's happened or found it offensive, it means it's a problem and should be stopped.



### Practical Example:

**Q:** You're having a coffee with colleagues when one of them starts insulting another one because of his origin and religion. It is not the first time you're witnessing such behavior and you can see that the insulted colleague feels attacked and doesn't know how to act. What should you do?

**A:** Planisware is committed to maintain a work environment free from harassment of any kind. Employees are encouraged to report any incident to:

- Your manager
- The HR Department
- The Ethics Committee

Or report it directly on the Whistleblowing tool.



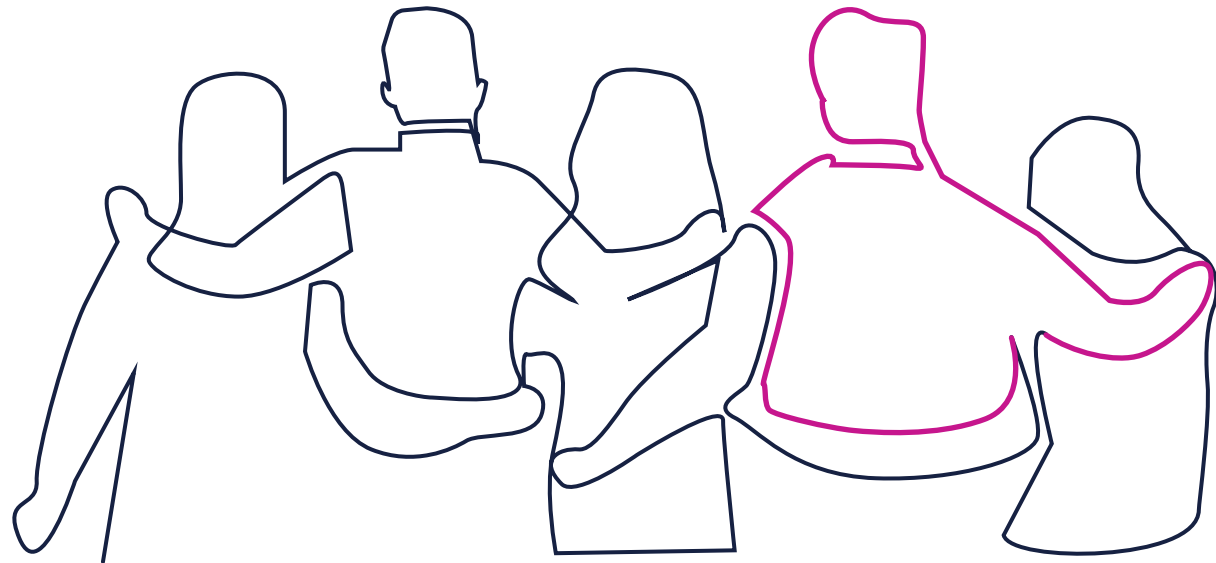
# Human Rights

Planisware supports and respects internationally proclaimed human rights. We align our business operations with the United Nations Guiding Principles on Business and Human Rights.

**We oppose all forms of violation of human rights, including but not limited to:**

- Child labor;
- Modern slavery (i.e., slavery, servitude and forced or compulsory labor) and human trafficking;

- Violation of applicable laws related to pay, benefits and working conditions (working hours, health, and safety requirements);
- We expect our suppliers to adhere to the same high standards of ethics, source responsibly and monitor their own suppliers as well to take corrective actions if needed. Planisware never knowingly does business with companies or individuals that engage in human rights abuses or violate employment laws.



# Health and Safety

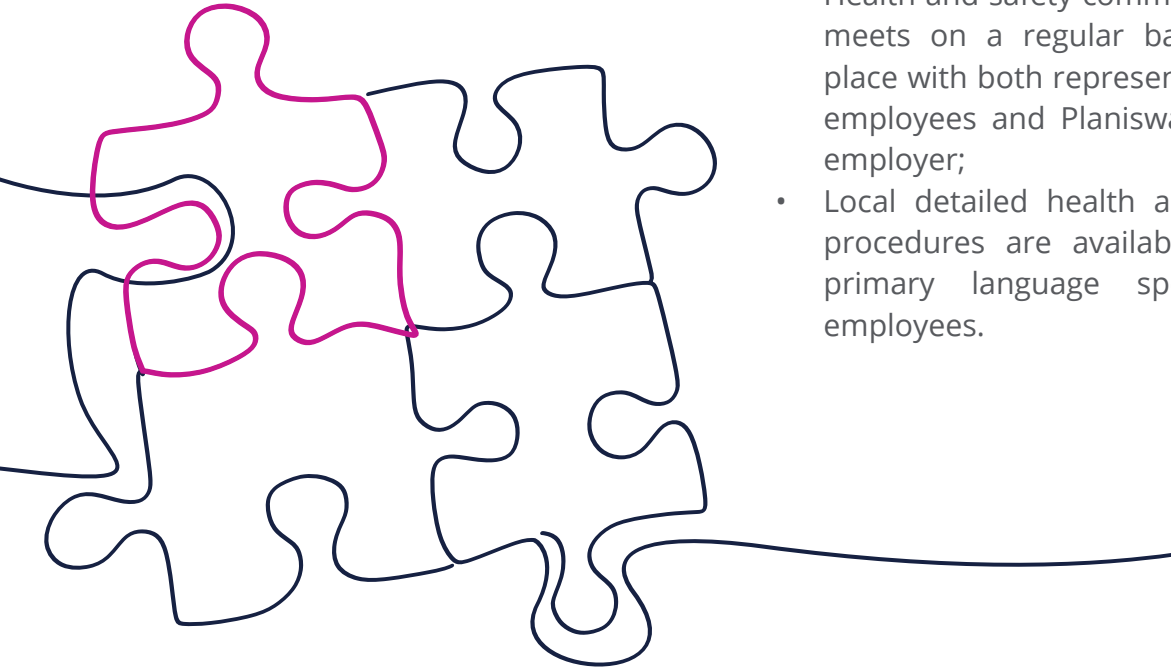
Planisware considers health, safety and security to be unquestionable obligations.

We believe that we all need to take some time to look after our physical and mental health. We often work in a fast paced and sometimes pressured environment, where we're trying to do our best for our clients and each other.

## Several actions are in place to ensure health and safety in our workplace:

- All Planisware offices are equipped with the necessary security equipment and regular inspections are performed by a third party to ensure the safety of the equipment;
- Locally, additional actions might be in place depending on local regulations such as (and not restricted to):
  - Health and safety committee, who meets on a regular basis, is in place with both representatives of employees and Planisware as an employer;
  - Local detailed health and safety procedures are available in the primary language spoken by employees.

You are required to comply with all health and safety policies, procedures and regulations depending on job position and location.



# Diversity and Professional Equality

At Planisware, we are deeply committed to fostering a professional environment where equality and diversity are fundamental to every part of the employee journey.

**We ensure all individuals, regardless of their background, are supported through:**

- Equal opportunities for recruitment, career development, promotion, and fair compensation;
- Objective decision-making based on performance criteria, ensuring merit, capability, and contribution guide our hiring, promotions, and compensation processes;
- Transparency in evaluations and regular compensation audits to ensure equal pay for equal work;
- Inclusive leadership and continuous efforts to address disparities, fostering an environment where everyone can grow and succeed professionally.

Diversity is integral to strengthening our organization. By embracing varied perspectives and experiences, we create an inclusive culture where all employees feel respected and empowered. Valuing diversity drives collaboration and innovation, enhancing our collective success.

By embedding both diversity and professional equality into all aspects of our operations, we strive to build a workplace that reflects our core values of dignity, respect, and inclusion, contributing to the success of both Planisware and its employees.

# Freedom of Association

Planisware recognizes employees' right to collective bargain and freedom of association, in accordance with local laws. We pursue social dialogue as a guiding principle and ensure that our employees and their representatives are kept informed and consulted.

# Training & Development

Development of its employees' skills is essential to Planisware and contributes to their career development. Planisware is committed to improve the access to training of its employees.

Planisware always encourages its employees and managers to pursue any opportunity for continuous learning through feedback and daily work.

# Our **Business Ethics**

Planisware is committed to the highest standards of integrity and transparency in all our operations. Thanks to strict guidelines and policies, we aim to prevent and combat any form of corruption, including bribery, fraud or money laundering.

# Conflicts of Interest

Conflicts of interest may impair or interfere with an employee's performance of its duties to the company or its ability to act in the company's best interests. A "conflict of interest" exists when an employee's personal or private interest improperly interferes with or is adverse (or appears to be adverse) to the interests of the company. A conflict situation can arise when an employee takes actions or has interests that may make it difficult to perform its work for the company objectively and effectively.

Employees of Planisware must never permit their personal interests to conflict, or appear to conflict, with the interests of Planisware, its affiliates, or its customers. Employees must be particularly careful to avoid representing Planisware in any transaction with entities in which the employee has a business affiliation, ownership interest, or other relationship.

Before engaging in any material transaction or relationship that reasonably could give rise to an actual or apparent conflict of interest, each employee must provide full and fair disclosure of all relevant facts and circumstances to the Human Resources team. After evaluating the reported transaction or relationship, Planisware management will determine the appropriate protective measures, if any, which may include restricting or prohibiting such transaction or relationship. Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with your manager, Human Resources, or the Legal Department.



## Practical Example:

**Q:** One of the procurement manager (responsible for selecting suppliers) informs you that he has just awarded a significant contract to his brother-in-law's company without disclosing it to the company. You told him it is essential that he discloses it to his manager and HR but he refused to do so. What should you do?

**A:** Planisware is committed to conduct business in a transparent way. Any potential conflict of interest must be disclosed, even though they don't all lead to an action. Conflicts of interest shall be reported to:

- Your manager
- The HR Department
- The Ethics Committee

Or report it directly on the Whistleblowing tool.



# Gifts and Entertainment

Exchanging gifts and entertainments can help strengthening the working relations with customers and partners, but, sometimes, they may also create a conflict of interest between professional duty and personal interest, unfairly influence a business decision or be seen as a bribe.

**Expenditures for gifts, business entertainment, or travel expenses for customers or prospects are permitted if they are:**

- Reasonable in their cost and amount (i.e. gifts of token value), limited in their scope (not repeated, not extended to spouses or entire teams) and fall within the ordinary course of business;
- Directly related to legitimate business purposes such as the promotion of products or services or the negotiation and execution of contracts;

- Supported by receipts and accurately reflected in the company's business records in the normal course;
- Not offered under circumstances that might create the appearance of impropriety (such as offered or provided in a secret or clandestine fashion). Lavish or unseemly accommodations or entertainment is not permitted.

As an employee of Planisware, if you are giving gifts or entertaining Government Officials (such as political candidate, an employee of a state-owned business, military personnel, or a member of a royal family) the rules of what you can give are even more strict – check with your manager and seek the Legal Department pre-approval before giving anything.



## Practical Example:

**Q:** You work as sales manager and a client sends you a box of champagne after a negotiation meeting where he requested a significant discount. It seems obvious that the gift is expected to make you swing your decision and allocate the discount. What should you do?

**A:** Our policy regarding gifts aims at preventing undue influence on business decisions. You are expected to decline politely and report it to your manager or HR.

# Anti-Bribery, Corruption, and Fraud

Corruption is a dishonest or fraudulent conduct, involving embezzlement, fraud, bribery and abuse of power.

A bribe is not always an envelope filled with cash, it can be a gift, entertainment, trip, charitable contributions or even an internship program or job offering. It is giving anything of value in order to obtain an unfair business advantage or influence the decision-making process.

Planisware is committed to fair competition and to conduct business with honesty and integrity. As an international company, Planisware is subject to applicable anti-bribery laws in the countries where we operate, including Sapin II Law.

Our Code is simple: bribery is prohibited in all its forms, in all situations, as well as facilitating payments (i.e. a tip or small payment (sometimes called “kickback”) to a government official in order to speed up a routine government action, like issuing licenses or permits, processing paperwork, or providing utility services).

## Act with integrity

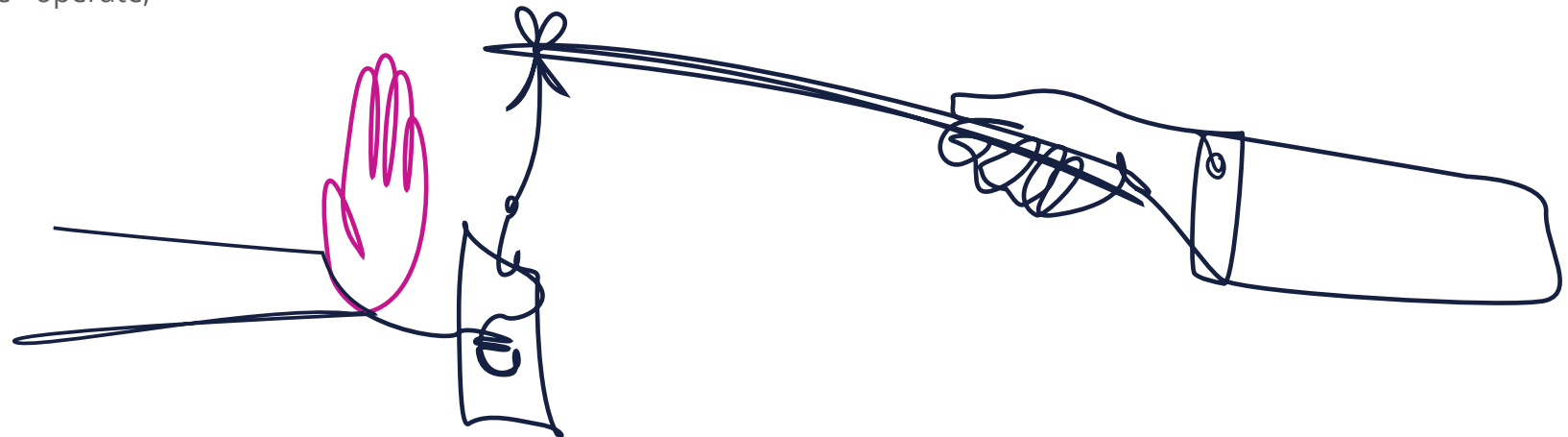
Don't give, offer, promise, or accept a bribe.

## Be transparent

Keep accurate records of anything given or received with sufficient and clear details.

## Remain compliant

Avoid any situation where a courtesy action can be perceived as a bribe. Before offering anything regardless its value, especially to a government official, check with your manager and the Legal Department to obtain their approval. Bribery can have severe consequences for individuals and for Planisware and its reputation, and must be fought in any situations.



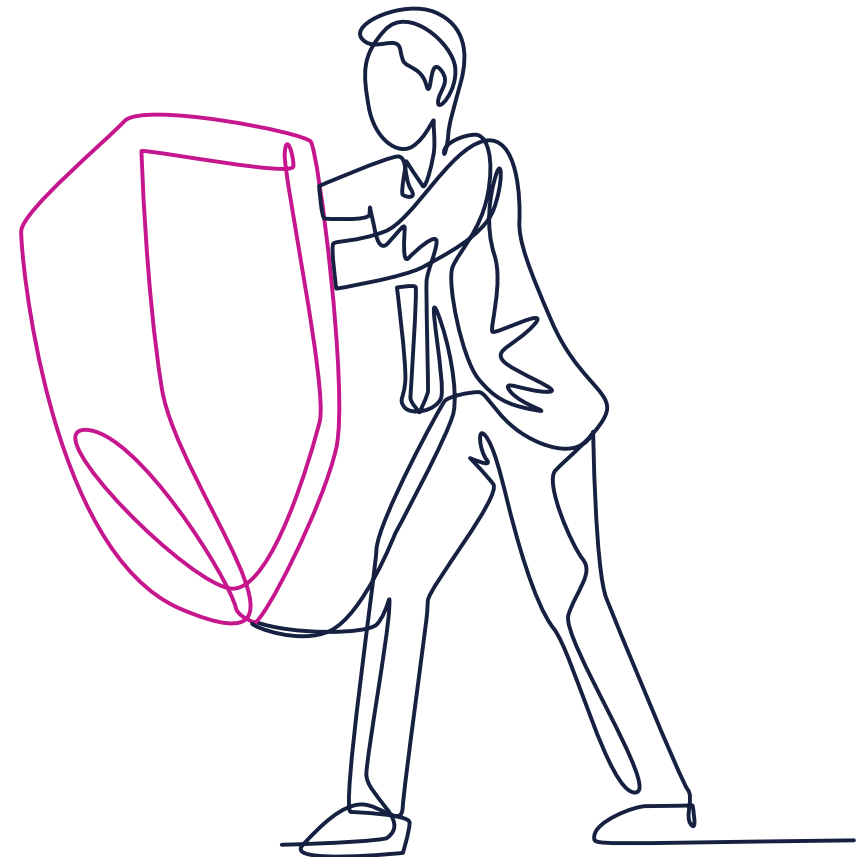
# Anti-Money Laundering and Anti-Terrorist Financing

The goal behind a large number of criminal acts is to generate a profit for the individuals or groups carrying them out.

Money laundering is a financial crime in which the illegal origin of acquired money or goods is hidden from law enforcement and financial regulatory and disguised to make them appear as if they came from a legitimate source.

Terrorism activities can take place in many different forms ranging from isolated acts to planned activities of organized groups. Terrorist financing involves the solicitation, collection, or provision of funds, from both legal and illicit sources, with the intention that they may be used to support terrorist acts or organizations.

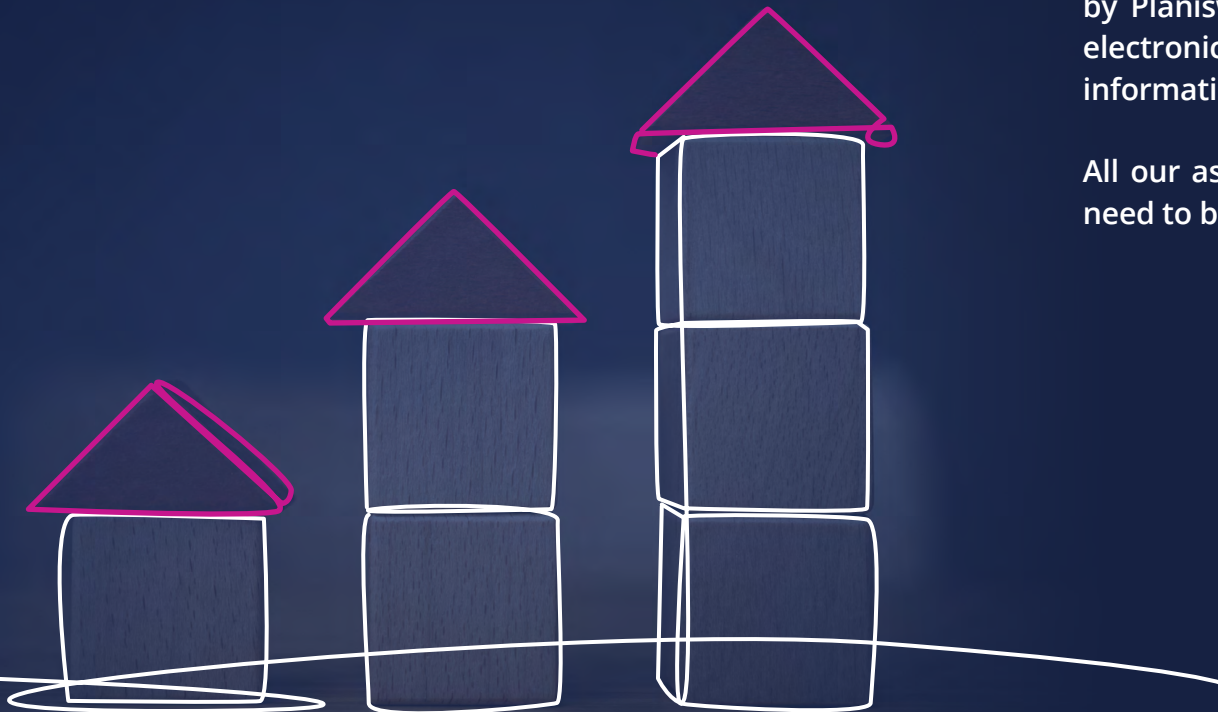
Planisware is committed to conduct its business in compliance with applicable anti-money laundering and combatting terrorist financing laws and regulations.



# Our **Assets**

Planisware assets are anything that is owned or used by Planisware to conduct business, whether physical, electronic, or financial assets as well as confidential information.

All our assets are considered of a big importance and need to be protected adequately.



# Safeguard Planisware Assets and Information

As a global software provider, some of our most valuable assets are intangible such as our customers' confidential information or our intellectual property.

Planisware has built a robust Information Security Management System (ISMS) to safeguard our information assets. It focuses on protecting four key aspects of data: confidentiality, integrity, availability, and reversibility. Planisware Compliance team performs regular internal audits to assess the performance and monitor the effectiveness of our ISMS that is also subject to formal annual external audit performed by a third-party.

## Confidentiality and Proprietary Rights

Employees may have access to Planisware's confidential information, intellectual property and other trade secrets. This information could include strategic business plans, product

development roadmaps, operating results, marketing strategies, customer lists, personnel records, new investments, operational costs, processes, and methods. Proprietary, confidential, and sensitive business information about Planisware, its affiliates, customers, and business partners should be treated with sensitivity and discretion and only be disseminated on a need-to-know basis in accordance with applicable confidentiality agreements. Hence, all employees are responsible for preserving the security of Planisware's information and must take appropriate steps to assure that such information is strictly safeguarded.

A confidentiality clause is incorporated by default in all employment or subcontracting contracts. Employees responsibility applies beyond the employment contract and does not end when they leave the company. Employees remain legally obliged to protect Planisware confidential business information and you should never share it with former or future employers.





# Financial Integrity

## Use of Planisware Funds and Assets

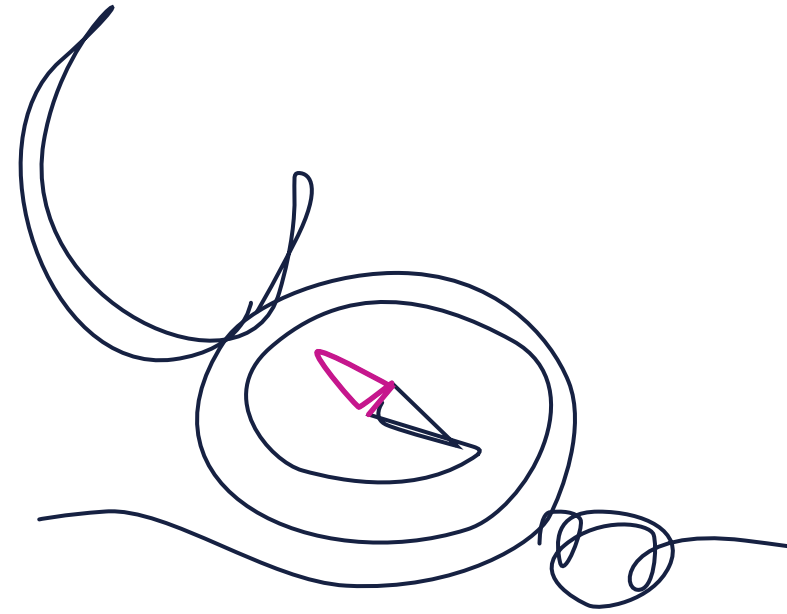
Employees are personally responsible for any Planisware assets or funds over which they have control, and anyone spending Planisware money should always be sure Planisware receives good value in return. Employees must not make any personal use of any Planisware tangible or intangible assets (including credit card).

Planisware assets are provided for legitimate business purposes. They should never be sold, loaned, or removed from Planisware property without permission from the manager. It is recognized, however, that occasional personal use by employees may be reasonable if it does not adversely affect the interests of Planisware. Employees should always consult with their managers for appropriate guidance.

## Records, Costs and Controls

Keeping accurate and complete records is necessary for Planisware to meet its financial and legal obligations. Records must be kept in accordance with accepted accounting rules and controls at all times and should fully and accurately reflect all business transactions. All reports, vouchers, bills, payroll and service records, expense accounts and other important operational and financial

information must be prepared with care and honesty. Employees are responsible for ensuring that labor and material costs are properly recorded on Planisware's records for faithful billing to Planisware customers, as applicable. No employee should ever, under any circumstances, misrepresent facts or falsify records about the number of hours or days worked or out of pocket expenses incurred.



# Personal Data and Privacy Rights

Data privacy refers to the protection of “personal data” (or “personal information”), which is any information that identifies or can identify, directly or indirectly, a physical person.

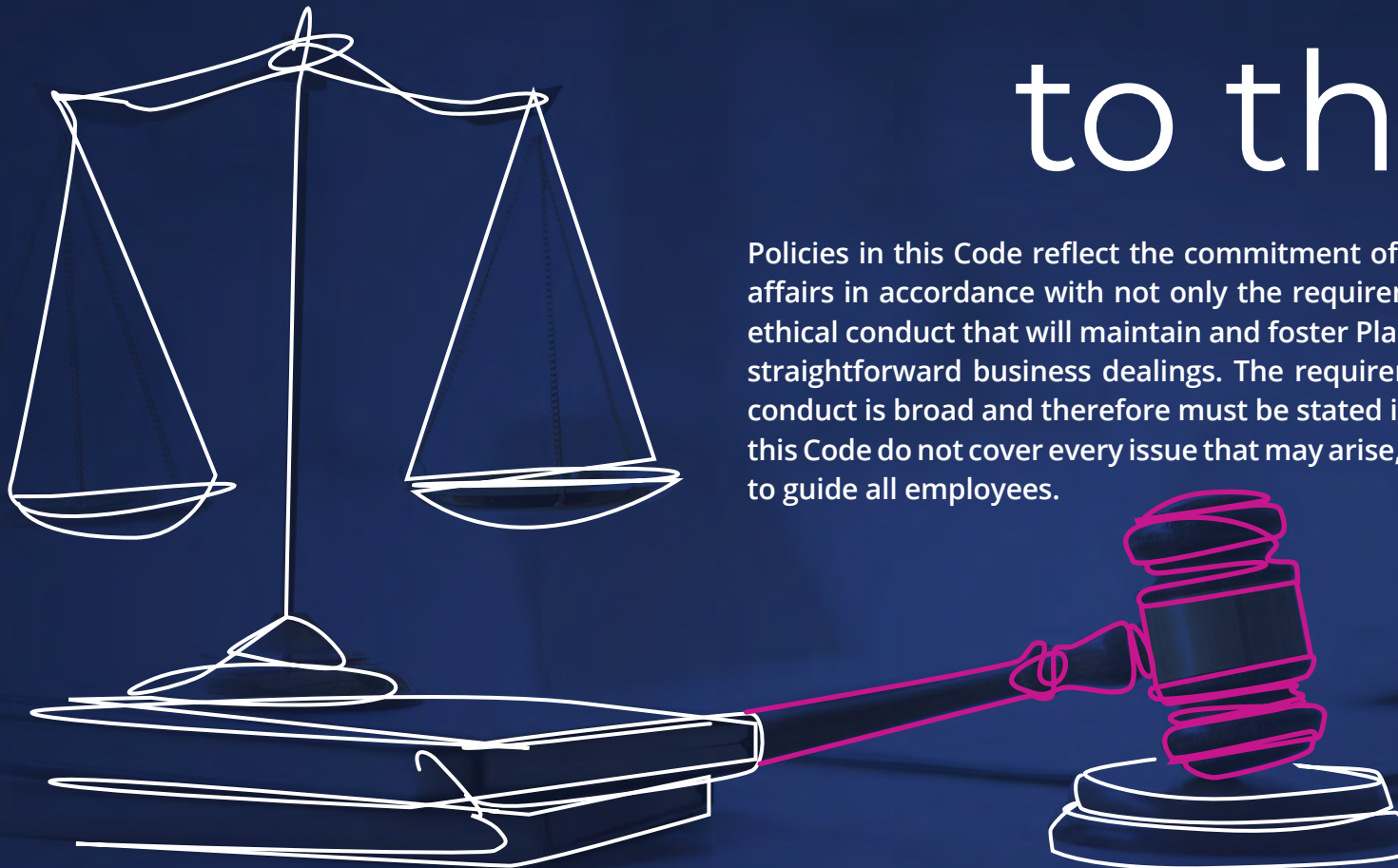
Personal data protection is a fundamental right protected by international conventions and legislations. Planisware is committed to protect personal information of customers, employees and business partners and handle it with care in accordance with applicable data protection law and Planisware privacy policies (<https://planisware.com/privacy-policy>).

Personal information shall remain confidential at all times and should not be shared with anyone without a business need to access it. If you suspect a personal information breach or a conduct that violates our policies, report it immediately to our Data Protection Officer and Legal Department ([dpo@planisware.com](mailto:dpo@planisware.com)).



# Our **Commitment** to the Law

Policies in this Code reflect the commitment of Planisware to conduct its business affairs in accordance with not only the requirements of law, but also standards of ethical conduct that will maintain and foster Planisware's reputation for honest and straightforward business dealings. The requirement of honest, lawful, and ethical conduct is broad and therefore must be stated in general terms. As such, Policies of this Code do not cover every issue that may arise, but instead sets out basic principles to guide all employees.



# Fair Competition and Anti-Trust

It is Planisware's policy to compete fairly in the marketplace based on our ability to provide high-quality products and service on reasonable terms.

Conspiracies and understandings that may improperly "restrain trade", including any understanding between competitors regarding price or price stabilization, are prohibited.

Also forbidden are understandings between competitors with respect to the division or allocation of markets, territories or customers and the boycotting of third parties. Prohibited arrangements between competitors do not require formal documentation or evidence of an oral understanding to be illegal.

A violation will be found to exist whenever it is shown that there was any kind of mutual understanding which gave the parties a basis for expecting that a business practice or decision adopted by one would be followed by the other.

Employees must also refrain from gathering competitor intelligence by illegitimate means and refrain from acting on knowledge which has been gathered in breach of a confidentiality obligation by a third party.

Failure to comply with antitrust laws could result in serious consequences for Planisware and its employees.

You are expected to report suspected antitrust problems to the Legal Department including invitations or offers from competitors or customers to engage in any suspicious activities.



## Practical Example:

**Q:** You are part of the Sales team and you are participating in a Tech Forum that occurs annually in San Francisco. A happy hour is organized at the end of the forum and you start discussing with a peer working for a software company which happens to be a competitor. He suggests that you concentrate on Western Europe while his company would concentrate in Eastern Europe, to be more efficient and get more clients. What should you do?

**A:** This practice is called "market sharing" and is illegal. You are expected to inform him that such practice is strictly prohibited and walk away. You can report it to the Legal Department for more information.

# Inside Information and Insider Trading

As a listed company, Planisware's communication is highly supervised and regulated. Management and employees must therefore comply with strict rules in terms of sharing and dissemination of any information that could have an impact on the company's share price (share price sensitive information), including financial information but not only like some extra financial information (ESG), regulated information and strategic information (acquisition, new contract, ...).

Management and employees are therefore strictly prohibited to share inside information with third parties. Employees can refer to the Group Sensitive Communication Guidelines for more information. In case of doubt, employees shall discuss it with management.

In addition, misusing information in order to disadvantage financial market investors or to gain an unfair advantage as an investor, is strictly prohibited as it is not just unethical and breaching our Code and policies but also illegal. In order to prevent people with insider information from trading their shares based on such information before it is made public, Planisware has set blackout periods: these are periods of time during which employees are prohibited from selling or buying Planisware shares. The blackout period lasts 30 calendar days before any results publication is made public (H1 and FY results) and 15 calendar days before quarter revenue releases (Q1 and Q3). A blackout period can also be imposed in connection with important corporate changes, such as mergers and acquisitions.





# Our Society

Planisware is a global supplier of software solutions with a long-standing commitment both to protecting the environment and to promoting social values.



# Responsible Communication

Planisware respects everyone's opinion and the freedom of speech. However, everything we say on behalf of Planisware may affect its name and reputation. Employees and contractors are expected to be honest, respectful, and polite when communicating with customers, colleagues, partners, or others. Everyone should clearly identify and mention whether speaking on behalf of itself or on behalf of Planisware.

Any employee receiving requests for a comment, statement, or opinion regarding a topic from a member of media, industry analyst or others, must refer them to Planisware Investor's Relation or the Marketing Department. No one should talk on behalf of Planisware unless "authorized or approved" to do so.

**Social media communication must comply with the principle of responsible communication and comply with the following general guidelines:**

## Take Responsibility

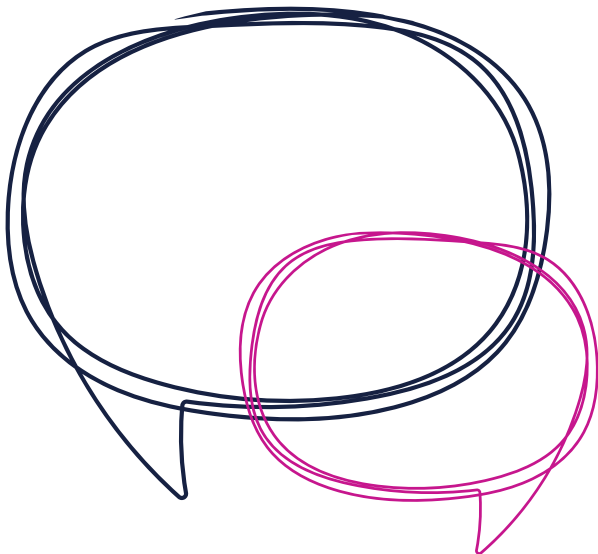
Employees are responsible for anything they write or do online. They should use good judgment when posting online and understand it may be affecting the company's reputation. Do not express, communicate, or link to comments that are vulgar, obscene, threatening, pornographic, harassing, defamatory, or which are a violation of the company's policies.

## Approval Process

Testimonials and endorsements shall be checked with the Marketing Department.

## No Confidential Information

No Confidential Information shall be shared including trade secrets, confidential strategic business initiatives (e.g., unreleased product roadmap plans) or any information that would compromise the company's intellectual property rights in any way. Employees may not use any client, vendor, or commercial partner name, trademark or logo for commercial use and may not disclose any confidential information of a Planisware customer, vendor, or commercial partner.



# Corporate Social Responsibility

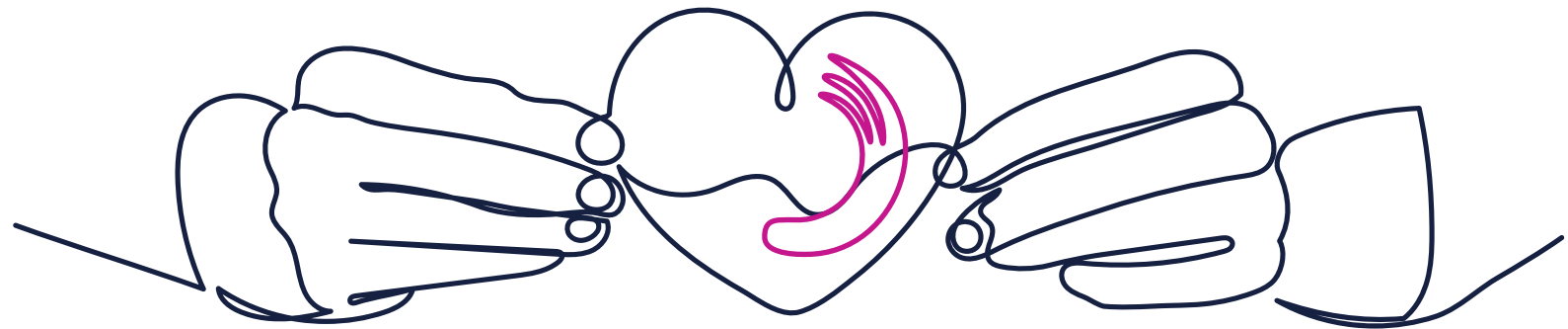
We commit to respect the Corporate Social Responsibility principles as set forward in the “ISO 26000 - Social Responsibility” standard and the “UN Global Compact”.

Our software solutions meet the growing demand for companies to drive their product development and maintenance activities more efficiently thus promoting lean practices, reducing usage of non-renewable resources, and contributing to the development of more environmentally respectful practices and solutions.

Based on Planisware long-term business management vision, our company strives to contribute to social responsibility standards in the software industry. We do this by implementing a set of clearly defined commitments to ensure that profitable growth goes hand in hand with environmental quality and social progress.

We are in process of building a list of performance indicators that we aim to report on a regular basis so that our

stakeholders can stay updated and track our progress on Environmental, Social and Governance (ESG) topics. The objective is to have quantitative and qualitative indicators to ensure that ESG topics are considered in our strategy, integrated in our operations and to communicate about our impact.



# Commitment to the Environment

At Planisware, we recognize our responsibility to protect the environment and strive to embed sustainable practices into every facet of our business. While the environmental impact of our operations is relatively modest compared to other industries, we are committed to continuous improvement and innovation to minimize our footprint and support a sustainable future.

We adhere to all applicable environmental regulations and aim to go beyond compliance by actively reducing energy consumption in our offices and data centers, optimizing business travel, managing waste responsibly, and integrating sustainability criteria into procurement decisions. Collaboration with partners who share our values amplifies our efforts, ensuring that sustainability is a central part of our decision-making process.

Environmental responsibility is a collective effort, and our employees play a vital role in achieving our goals. We encourage them to make informed choices, such as reducing waste through recycling, saving energy, and opting for sustainable travel and procurement options. Employees are also empowered to propose ideas that improve environmental performance and act as ambassadors of eco-conscious practices within and beyond the organization.

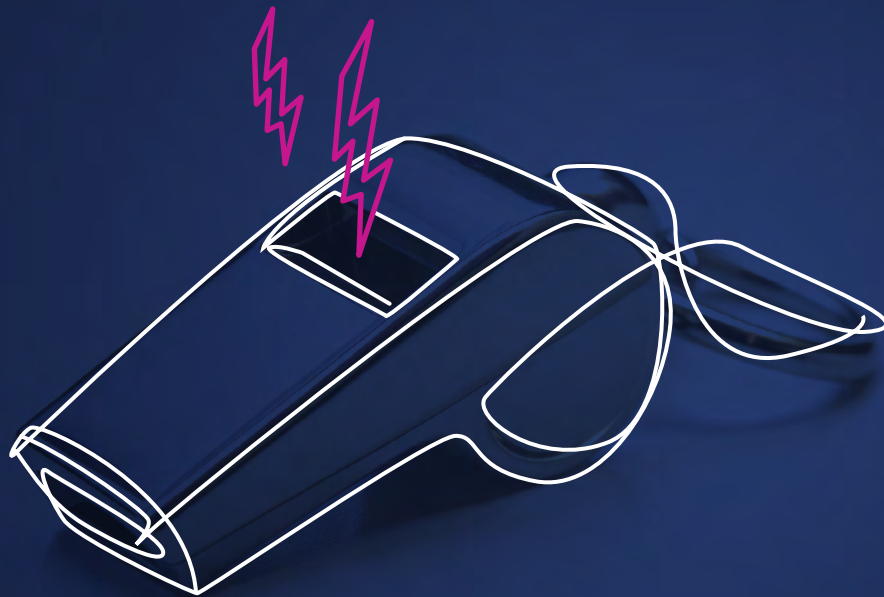


## Practical Example:

**Q:** I need to travel abroad for work. Should I take the train or the plane?

**A:** First, evaluate whether the trip is essential. Planisware offers virtual collaboration tools, such as Microsoft Teams, which can often eliminate the need for travel. If the trip cannot be avoided, consider the environmental impact of your options: a train journey typically has a carbon footprint 6–10 times lower than a flight over the same distance. If flying is necessary, prioritize direct flights to reduce emissions and avoid unnecessary stopovers. Additionally, opt for shared transport or public transit to and from the airport to further minimize your impact.

# Our Whistleblowing Policy



Planisware is dedicated to fostering a culture of transparency and accountability. Our whistleblowing policy is designed to provide a secure and confidential channel for all stakeholders to report any unethical or illegal activities. We ensure that all reports are taken seriously and investigated thoroughly, without fear of retaliation.



# Ask Yourself

Before you engage in any activity that makes you uncomfortable, make sure you take these steps:

## Stop and reflect

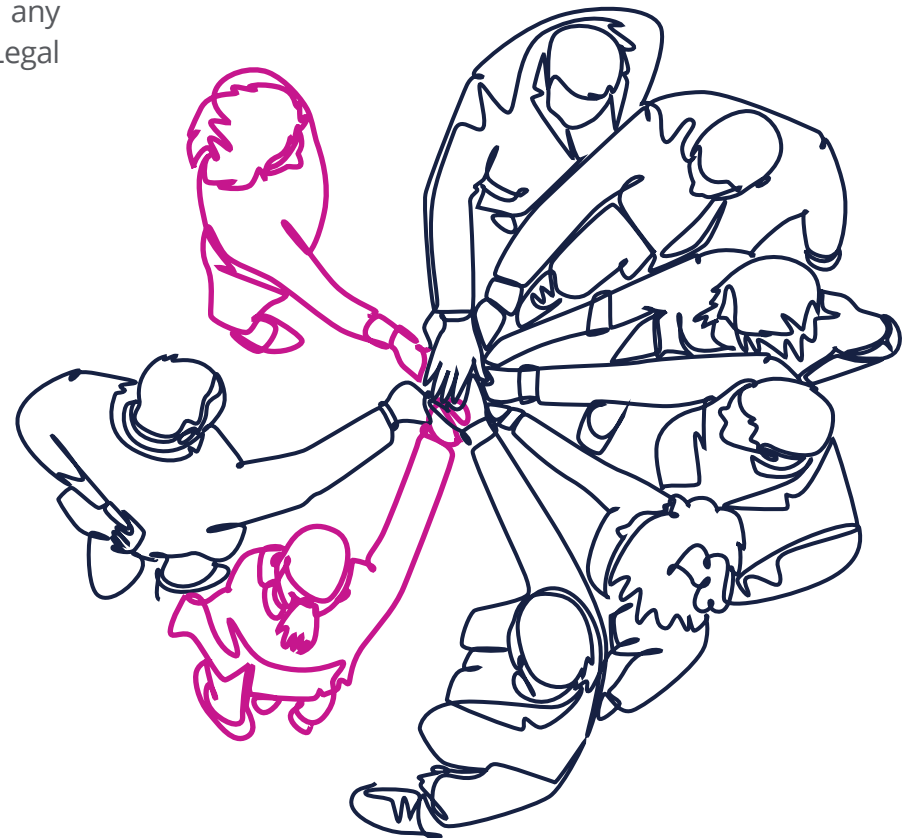
Ask yourself “what specifically am I being asked to do? Does it seem unethical or improper?” Use your judgment and common sense; if something seems unethical or improper, it probably is.

## Discuss with your manager

If your manager is requesting you to perform the actions that are making you uncomfortable, discuss with other managers or a member of the executive team.

## Seek legal advice

If you are unsure of what to do in any situation, seek guidance from the Legal Department before you act.



# Whistleblowing: Speak Up!

Your voice matters. Whether you are an employee of Planisware, a trainee, an officer, a member of the management team, a shareholder, a contractor, or a client, it is also your role to ensure that Planisware respects its commitments towards ethics and compliance with laws and regulations.

However, problems can only be fixed if we are aware of them. The earlier we learn about them, the greater our chances to deal with them and limit the harm they can have for Planisware and our stakeholders.

We have an “open door policy” at Planisware; we promote an atmosphere where you can talk freely and discuss any concerns or issues that you might have. You can reach out to your manager, a member of the Human Resources team, Legal Department or whenever there is something that doesn't feel, look, or sound right.

You can also report any breach of the Code of Ethics and Business Conduct, or of any laws and regulations on the tool at your disposal:

→ **Report Tool**



Our Ethics Committee will handle your alert with great care and confidentiality, and will revert to you in due time in accordance with applicable laws.

Nothing in this Code or in any Planisware policy prevents you from communicating directly with law enforcement or government agencies about actual or potential violations of laws or regulations.

No prior permission of Planisware's Legal Department is needed to engage in such communications, nor do you need to inform the company about such communications.

# Confidentiality Guarantee

Planisware whistleblowing procedure guarantees the strict confidentiality of the facts reported, as well as the personal data of the whistleblower, the person(s) implicated or named in the alert, and any third party mentioned in the alert.

Also, the whistleblower has the right to remain anonymous through the Whistleblowing Tool.

This information is accessible only to the persons in charge of handling the alert, under the conditions of confidentiality required by current legislation. This confidentiality applies without prejudice to Planisware's right to initiate disciplinary and/or legal proceedings in relation to the facts reported, as soon as the investigations carried out in the context of handling the alert make it possible to establish that they are true.



# Protection of the Whistleblower

At Planisware, we are committed to protecting individuals who report unethical or illegal activities. In compliance with the French Sapin II law, our whistleblower protection policy ensures that anyone who raises concerns in good faith is safeguarded against retaliation, discrimination, or any adverse consequences.

We provide a secure and confidential reporting channel, and all reports are handled with the utmost seriousness and integrity. By protecting whistleblowers, we reinforce our dedication to ethical conduct and transparency within our organization.

