

Statement of Business Integrity

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Summary

The Word of the CEO	2
01 Introduction	3
Upholding standards beyond Pluxee employees	3
Upholding ethical and legal standards worldwide	3
02 Ethical Principles	4
03 Compliance	4
Confronting Bribery and Corruption Head-On	4
Ensuring Fair Play: Competition Standards	5
Mitigating Conflicts of Interest	5
Anti-Money Laundering and Counter Financing of Terrorism (AML-CFT)	6
04 Data Protection	6
Data Protection and Privacy	6
New Technologies and Data	7
Safeguarding Pluxee's Assets and Information	7
Ensuring Transparency in Financial Practices	7
05 Human Rights	7
Respect and Equality: Ensuring a Safe Workplace for All	7
06 Sustainability	8
Employees contribute to a positive impact on the Environment	8
07 Speak Up	9
Upholding Standards and Reporting Violations	9

The Word of the CEO

“At our core, we’re on a mission to enhance the individual’s well-being while fostering economic, social, and environmental progress in the communities we touch. Guided by ethical principles, we navigate our day-to-day operations with integrity. Pluxee commitment is to build a company that earns the trust of employees, clients, consumers, merchants partners and all stakeholders.

Mutual respect is the cornerstone of every relationship forged within our company. We hold ourselves to the highest business integrity standards, recognizing that adherence to these principles is not just a requirement, but a legal and moral obligation.

We take all the necessary actions to uphold the law and ensure a workplace where everyone feels confident in their association with us. This document serves as a guide, empowering you to play your part and reinforcing our unwavering support for doing what is right. I thank each of you for your personal and continuous commitment on these principles.”

01 Introduction

Embracing the highest standards of ethics and integrity in every facet of Pluxee's activities is not just a commitment; it's a beacon guiding us toward our mission of empowering individuals, enhancing their well-being and all those we serve. Our dedication extends beyond mere compliance — it forms a vital pillar of our Responsible Business Conduct commitments. With optimism and focus, we cultivate a culture where business integrity becomes a driving force for positive impact in the local communities where we operate.

This Statement of Business Integrity ("Statement") outlines the integrity standards that Pluxee upholds on its business. **These guidelines constitute a non-negotiable framework which apply to all members of our team, from Board members, leaders, top management and executives to managers and front-line employees**. It is essential for everyone in Pluxee to be familiar with and adhere to these principles. Pluxee employees are expected to always prioritize these standards over financial or other business objectives and personal gain. We steadfastly reject any form of corruption, fraud, or illegal practices wherever our operations extend.

As global player, we recognize the inherent challenges that arises when operating business in multiples countries and cultures. However, the principles established in this Statement shall remain resolute. Pluxee trust its employees to exercise good discernment and use the tools available to them to uphold these standards consistently without exception and without seeking loopholes or shortcuts to bypass them. Every action we take should not only comply with legal requirements but also reflect our commitment to Business Integrity, appearing ethical and fair to our colleagues, ourselves, stakeholders and the public.

Upholding standards beyond Pluxee employees

We are all responsible to comply with these standards, not only Pluxee employees but also our consultants, and anyone representing Pluxee or hired to act on our behalf. Those engaging consultants or other representatives on behalf of Pluxee are responsible for ensuring that these individuals adhere to the standards stated herein. Due diligence shall be conducted on all Pluxee's consultants and representatives to confirm that they do not have a history or reputation for unethical behavior.

Each one of us plays an important role in helping to maintain our reputation as a responsible business. Pluxee's employees must avoid attempting to perform indirectly through third parties what they are prohibited from doing directly.

Upholding ethical and legal standards worldwide

We operate a complex business working with different products in several countries and cultures. However, the principles in this document are consistent across our entire business. We all have a responsibility to understand these principles, follow them to the letter and ensure we use good

judgement, not only to ensure we are legally compliant, but to ensure we always do the right thing, that we are ethical, fair and a good corporate citizen.

We hold our employees to the same standard, expecting diligent compliance with legal requirements. While we don't expect our team to be legal experts, we do encourage familiarity with the laws relevant to their roles. When in doubt about legal concerns, Pluxee employees shall seek guidance from our legal function to ensure clarity and compliance.

Pluxee will unwaveringly adhere to all applicable laws and regulations across our operational landscape and commits to uplift the ethical standards whenever possible, linked to our ethical principles reminded below.

02 Ethical Principles

LOYALTY	RESPECT FOR PEOPLE	TRANSPARENCY	BUSINESS INTEGRITY
<p>A foundation of loyalty, shared by Pluxee with its clients, employees and shareholders, based on honest, open relations. Loyalty is one of the cornerstones of operations in our organization.</p>	<p>Humanity is at the heart of our business. Pluxee is committed to providing equal opportunities, regardless of race, origin, age, gender, beliefs, religion or lifestyle choices. Improving quality of life means giving each person respect, dignity and consideration.</p>	<p>This is one of Pluxee's major principles and a constant with all stakeholders: clients, consumers, employees, shareholders and the general public.</p>	<p>We do not tolerate any practice that is not born of honesty, integrity and fairness, anywhere in the world where we do business. We clearly communicate our position to our clients, suppliers and employees and expect them to share this rejection of corrupt and unfair practices.</p>

03 Compliance

Pluxee pledges to act honestly and fairly in all our interactions with our employees, clients, customers, partners, and suppliers. This commitment extends to honoring our contractual obligations and upholding the essence of our business agreements.

Confronting Bribery and Corruption Head-On

Pluxee is committed to securing business based on merit rather than resorting to bribery and corruption.

We emphasize that our business success is founded on the strength and quality of our service offerings. Pluxee and anyone representing us, will not offer gifts or other valuables to public officials or private parties to gain a business advantage. Whether engaging with government officials, private customers, or potential clients, we refrain from giving gifts, providing entertainment, or making inappropriate political contributions to influence decisions related to Pluxee, secure contracts, or gain unfair business advantages. Similarly, our employees are prohibited from accepting gifts or entertainment from suppliers or potential suppliers in exchange for business favors, better pricing, or any improper business advantage.

Pluxee employees must consistently adhere to our standards of integrity and honesty. They should avoid any actions that could appear improper and must not accept, offer, or give gifts or entertainment that might compromise their conduct, influence others, or cast a negative light on Pluxee.

While certain limited gifts and business entertainment may be acceptable within our Business Integrity standards, they must be of modest value, comply with all applicable laws and local business practices, and not be intended to gain an improper advantage.

It's crucial to recognize that gifts or entertainment permissible for non-governmental customers might be illegal or unethical when dealing with public officials. Given varying government rules and potential challenges in distinguishing between commercial and government officials, employees must exercise particular caution when interacting with public officials.

Ensuring Fair Play: Competition Standards

Pluxee is dedicated to fair, open, and legal competition.

The global free enterprise system is built on principles of fair and legal competition, and as a global leader, Pluxee is committed to operating and expanding our business profitably through intelligence, innovation, hard work, and a continuous focus on improving the employee engagement for our clients and enhancing the well-being of our customers and employees.

We uphold the principles of objective decision-making in our selection and purchasing processes, considering factors such as price, delivery, quality and Environmental, Social and Governance criteria. It is our expectation that our clients and suppliers will follow the same principles.

Pluxee independently determines pricing and financial deals, refraining from making agreements with competitors to divide markets or clients. We strictly adhere to antitrust laws, which prohibit competitors from engaging in practices such as fixing prices, rigging bids, or allocating markets, geographies, or clients.

In our commitment to fair competition, we do not engage in misrepresentation of our competitors' businesses, nor do we attempt to acquire a competitor's trade secrets or confidential information through theft or fraudulent means. Our focus remains on maintaining integrity and transparency in all our competitive endeavors.

Mitigating Conflicts of Interest

All business decisions should be grounded in objectivity and a sincere belief in what is best for the business, without any influence from individual employees' personal benefit or advantage. Pluxee employees are expected to be vigilant in recognizing and addressing actual or potential conflicts of interest.

When an employee holds a position where their influence on a Pluxee decision could lead to personal gain for themselves, a relative, or a close acquaintance, a conflict of interest arises. In such cases, the employee is required to disclose the situation, and steps may be taken to mitigate their influence on the decision. For instance, management employees are advised not to work for Pluxee's competitors, and employees should refrain from creating or operating businesses that supply, partner with, or provide services to Pluxee while concurrently employed by Pluxee. This ensures transparency and upholds the integrity of our decision-making processes.

Anti-Money Laundering and Counter Financing of Terrorism (AML-CFT)

Pluxee is committed to tackle any form of money laundering (ML) and financing terrorism (FT) through the use of Pluxee products and services we offer in our 32 entities worldwide. Implementing the international standards set by the Financial Action Task Force¹ will help deter any threat of money laundering and financing terrorism and therefore, protect the integrity of the financial system of countries wherever Pluxee does business.

In particular, employees must ensure Pluxee complies with economic sanctions laws and regulations. This includes identifying internally the level of money laundering and financing terrorism risk exposure and setting up an adapted program locally to ensure that the level of risk exposure is controlled and mitigated as possible.

By among other things, such program makes sure employees involved in onboarding new clients verify their identity and legitimacy prior to starting a business relationship. During the entire life of the business relationship, risk-oriented monitoring of transactions must be performed by dedicated Pluxee employees. As part of our global standards, risks of potential money laundering or terrorism financing must be assessed when providing new business activities and/or products and employees must be trained to better understand and approach the risks they face.

04 Data Protection

Data Protection and Privacy

Employees are responsible to respect privacy and to protect confidential information, including personal data.

Employees are responsible for respecting privacy and protecting confidential information and personal data of their colleagues but also of any other data subject (eg. consumers, clients'

¹ the global AML/CFT standard-setting body

employees, merchants' employees, business partners, shareholders). Employees must comply with Company policies and processes intended to ensure compliance with all relevant privacy and data protection and cybersecurity laws.

New Technologies and Data

Employees must use new technologies and data in compliance with our ethical principles.

Data usage is essential to improve the quality of life of our clients' employees and more broadly, of all consumers. It is essential to contribute to the economic, social and environmental development of the communities, regions and countries where we operate. Artificial Intelligence and Advanced Analytics ('AI') and Internet of things, amongst other innovations, can help us in this mission. However, these innovations need to respect "by design" our ethical principles as well as the digital rights and freedoms of individuals.

Safeguarding Pluxee's Assets and Information

Our employees are entrusted with safeguarding and utilizing Pluxee's assets, which include proprietary information and intangible property, solely for the benefit of the organization. It's imperative that our team works professionally and in good faith to promote the best interests of our company. Proper use of assets, in alignment with management authorization, is key, and misuse or waste is strictly prohibited. The duty to protect confidential information about Pluxee, its clients, suppliers and employees extends beyond employment, requiring ongoing commitment even post-departure. Personal gain, whether for oneself or relatives, friends or acquaintances, using company property or insider information, is strictly off-limits. Our employees must refrain from leveraging insider information - such as non-public information about financial results, mergers or acquisitions, large contract awards or strategic plans - for personal securities trading or sharing it with third parties. Integrity and responsibility guide our actions to ensure the enduring success of Pluxee.

Ensuring Transparency in Financial Practices

Our commitment to keep accurate and reliable business records and provide transparent financial statements is part of the foundation of our integrity. Every Pluxee employee plays a crucial role in maintaining records that reflect a true and fair view of our financial landscape which includes results of operations, transactions, assets and liabilities of our company. Upholding generally accepted accounting principles and our internal controls is not just a practice; it's our standard. There's no room for false entries – our books tell the honest story of our operations. We stand firm: no compromise on the integrity of our financial statements. Coercion, manipulation, and misleading actions have no place here. Let's champion transparency, ensuring our financial records shine with credibility at every glance.

05 Human Rights

Respect and Equality: Ensuring a Safe Workplace for All

Pluxee is dedicated to promoting diversity, equity and inclusion among all its staff and all external stakeholders. Our objective is that every person feels valued and empowered to contribute as much as possible to the growth of our business and organization, and that our people are authentically representative of all groups in society.

Consistent with our Statement of Respect for Human Rights and our Diversity and Inclusion Policy, our commitment to Business Integrity includes treating our employees with honesty, fairness, respect, and dignity.

Pluxee will provide a safe and healthy workplace. Working conditions must comply with applicable laws and regulations at a minimum. Pluxee expects all employees to treat each other with decency and respect. No violence in the workplace is permitted as well as any verbal, emotional, psychological, sexual, physical, or any other form of harassment, abuse, intimidation, or bullying.

Pluxee will not tolerate any form of discrimination against employees in the following characteristics to age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief and sexual orientation. Also, Pluxee forbids discrimination and works to ensure a high-level diversity, equity and inclusion across the following key employment lifecycle touch points but not limited to compensation and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, selection for employment, evaluation, promotion and training or other development opportunities.

Employees who fail to comply with this policy may be subject to constructive counseling up to and including termination of employment.

Pluxee does not tolerate the use of indentured, slave, bonded or other forced involuntary labor. Nobody under the age of 15, or the legal age of employment in any country or local jurisdiction, whichever is higher, may be permitted to work for Pluxee, and no minor may be employed to perform hazardous work, and any employment of minors is subject to any legal limitations regarding hours of work, wages, working conditions, and minimum education.

Pluxee respects the rights of our employees to decide whether or not to be represented by a trade union and to bargain collectively. We will not discriminate or retaliate against any employee or employee representative because of affiliation with, support for, or opposition to any union. Pluxee pays employees lawful wages and benefits on a timely scheduled basis for all time that they have worked. The teams observe all applicable laws and regulations for working hours for employees, including maximum hour limitations and requirements for break times. Overtime may be required only as permitted by law based upon the nature of the work.

06 Sustainability

Employees contribute to a positive impact on the Environment

Pluxee is committed to operating with high environmental standards to ensure a positive impact and build a sustainable relationship with our partners and clients. At Pluxee, we expect our employees to commit to addressing climate change and supporting us in achieving our Net Zero target by 2035. In

accordance with our business conduct standards, we also rely on our employees to be responsible for making a conscious use of resources, water and energy consumption, and contribute to limiting the environmental impact in our direct operations and value chain.

07 Speak Up

Upholding Standards and Reporting Violations

All Pluxee employees are entrusted with the responsibility to comprehend and adhere to this Statement along with all other Pluxee policies in force. Failure to comply with this Statement or other Pluxee policies may lead to disciplinary measures, including possible termination of employment, in accordance with local laws and applicable collective bargaining agreements.

Employees are encouraged to promptly report any suspected violations of laws or Pluxee policies as soon as they become aware of them. Pluxee is committed to providing our employees and other stakeholders with effective mechanisms to voice concerns related to business integrity.

All reports shall be submitted in good faith and will be handled with the utmost seriousness and confidentiality to the fullest extent possible. Employees filing such reports will be shielded from retaliation, threats, or harassment and their identity will be kept confidential to the extent permitted by law.

Employees bear the responsibility of comprehending and adhering to this Statement and all other Pluxee policies. It is also incumbent upon them to promptly report any suspected violations of laws or Pluxee policies. This commitment ensures that our workplace operates in alignment with established standards, fostering a culture of integrity and accountability.

Recognizing the complexity of the issues addressed in this Statement and the dynamic nature of business, unforeseen circumstances may arise. Pluxee is dedicated to providing employees with the necessary resources and support to meet the standards of business integrity. This includes offering further guidance to elucidate the principles outlined in this Statement and practical tools to assist employees in applying these principles to our business. Additionally, different units within the Group may issue additional guidance tailored to their specific situations, reinforcing our commitment to upholding the highest standards of integrity throughout our organization.