

# ETHICS CHARTER

**MiGSO-PCUBED**

AN ALTEN COMPANY



ALTEN

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## Message from the CEO

Since its creation in 1988, the ALTEN Group has established itself as a world leader in the field of engineering and IT services, supporting its customers' development strategies.

Our corporate culture is based on the key values and principles of integrity and transparency. They are at the very heart of our corporate strategy, enabling us to build lasting relationships with all our stakeholders.

Our excellent reputation can only be maintained by acting in the strictest compliance with the laws and ethical standards. This is why our Ethics Charter is intended to describe the principles of action that should inspire everyone's behaviour under all circumstances and in all the countries in which we operate. Updating this Charter is an opportunity to reaffirm our commitment to the ethical approach that we have consistently pursued for many years now.

Each of us, whatever our position in the hierarchy or level of responsibility, must act responsibly and in accordance with the requirements of this Charter by:

- putting the principles of the Ethics Charter into practice on a daily basis;
- inculcating a culture of ethical awareness in our teams;
- encouraging the flagging of ethical concerns;
- reporting any conduct that may violate our ethical principles.

Ethics is everyone's business; I am convinced that the actions of each and every one of us contribute to making our approach effective and sustainable, enabling us to consolidate our position as a key player in the world of IT engineering and services.

Together with the Executive Committee, I affirm our commitment to maintaining the highest ethical standards. We are counting on your active engagement and vigilance.

**Simon AZOULAY**  
CEO of ALTEN Group

# I. FOREWORD

## The values of the ALTEN Group

Our corporate culture is based on key values. These guide our day-to-day actions.



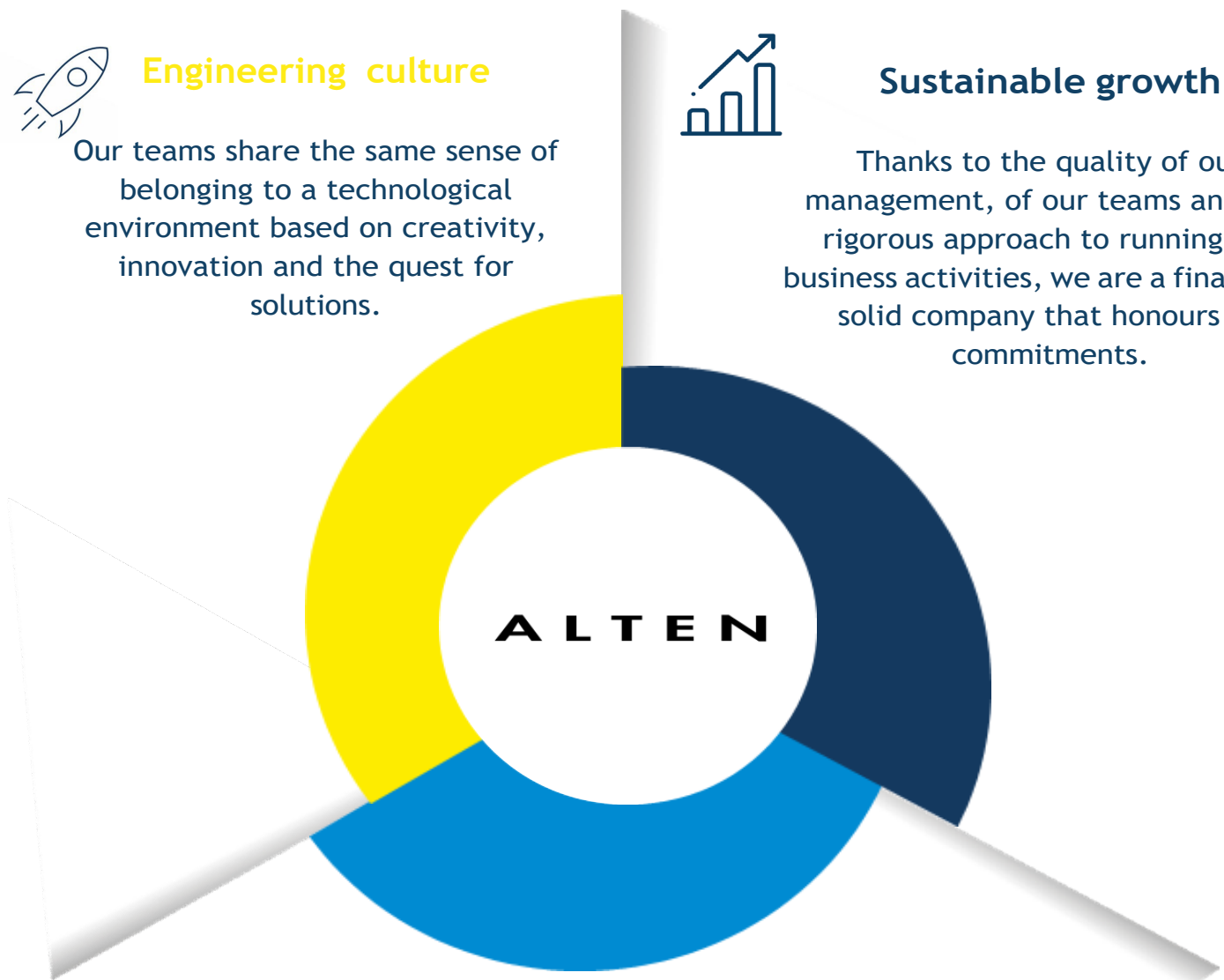
### Engineering culture

Our teams share the same sense of belonging to a technological environment based on creativity, innovation and the quest for solutions.



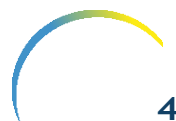
### Sustainable growth

Thanks to the quality of our management, of our teams and our rigorous approach to running our business activities, we are a financially solid company that honours its commitments.



### Human capital development

Nurturing talent, facilitating individual development, building expertise and acting as a springboard into the future are among our fundamental commitments.



# Ethics and compliance governance in MIGSO-PCUBED

An organisation dedicated to ethics and compliance.



## II. ETHICS CHARTER

The Ethics Charter sets out the ethical principles applicable within our Group and is designed to guide us in the day-to-day application of the Group's values. It describes the Group's guiding principles and illustrates them so that everyone can apply these under all circumstances.

The Ethics Charter is addressed at all the Group's directors, managers and employees, regardless of the country or legal entity concerned. We also ensure that our partners (suppliers, subcontractors, partners, etc.) are aware of our ethical commitments, and we expect them to align themselves with our ethical approach and to share and respect the guiding principles set forth in the ALTEN Ethics Charter.

Available in several languages, our Ethics Charter is accessible to everyone on our various internet and intranet sites. It is also presented to all new employees, managers and directors when they first join the Group.

Obviously, the Ethics Charter cannot cover all situations likely to raise ethical questions in the context of our business activities. **It follows that each and every one of us needs to be discerning and ask ourselves the following questions before making any decisions:**



If I have answered **NO** to any of these questions or if I have any doubts, I should consult my Manager, my MP Ethics & Compliance Ambassador ([compliance@migso-pcubed.com](mailto:compliance@migso-pcubed.com)) or my Ethics & Compliance ambassador or the Compliance Department ([compliance@alten.com](mailto:compliance@alten.com)).

They will advise me on the right course of action.

I can also report this problem on the Group's whistleblowing system: [ALTEN Integrity Line](#).

It is up to each and every one of us to know, understand, respect and apply the ethical principles set out in the Ethics Charter.

## Employee health and safety

All employees must be familiar with, and comply with, the health and safety rules established by MIGSO-PCUBED (“MP”) and the wider ALTEN Group. This includes observing all Company procedures and responsibilities as set out in the Health & Safety Policy and Manual.

When working on client premises, employees must also adhere to the health and safety protocols specific to the client site. It is our shared responsibility to maintain a safe working environment - both within our organisation and in partnership with our customers.

### Compliant conduct

- I have read and understood MP’s [Health and Safety Policy Statement](#) and [Health and Safety Manual](#),
- I have completed the required health and safety e-learning modules,
- I apply the health and safety rules in my daily work and ensure I act in accordance with them at all times,
- As a manager, I am also responsible for ensuring that my team members understand and strictly adhere to these rules. I lead by example and promote a culture of safety and accountability.



### Communication is key

If I become aware of a potential health or safety issue affecting employees, I will raise it with my Manager or the designated Health and Safety Manager/Advisor.

## Diversity, inclusion and non-discrimination

We offer equal employment and career opportunities to all, irrespective of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, sexual orientation, religion or belief, sex, or any other protected characteristic.

At MP, we are committed to maintaining a respectful, inclusive, and discrimination-free working environment. All employees are expected to treat colleagues with dignity and to uphold the principles of our Diversity and Equality Policy in both conduct and decision-making. This applies equally to our recruitment, career development, and day-to-day workplace interactions.

### Compliant conduct

- I have read and understood MP's [Diversity and Equality Policy](#),
- I treat all colleagues, clients, and third parties with dignity and respect,
- I do not tolerate or engage in any form of harassment, bullying, or discrimination,
- I challenge or report behaviour that is inconsistent with the principles of this policy,
- I understand my responsibility to help maintain an inclusive and supportive workplace.



### Communication is key

If I encounter an issue relating to diversity, inclusion or discrimination - whether personally or as a witness - I will raise it with my line manager or the [HR Team](#). I understand that concerns will be treated seriously, confidentially, and without fear of victimisation.

## Preventing harassment

We do not tolerate any form of harassment, bullying, or intimidation - whether sexual, physical, psychological, or verbal. Inappropriate gestures, language, or conduct - including racist, discriminatory, sexist, or sexual comments - are strictly prohibited, whether directed at individuals or occurring in their presence.

All employees have the right to work in an environment that upholds dignity, respect, and professionalism at all times. Allegations will always be taken seriously, with each case assessed on an individual basis. Where concerns warrant disciplinary action or are raised formally, they will be handled in line with our Disciplinary and Grievance Policy and Procedure.

### Compliant conduct

- I have read and understood MP's [Bullying and Harassment Policy](#) and [Sexual Harassment Policy](#).
- I treat all colleagues and third parties with dignity, courtesy, and respect at all times,
- I do not engage in or tolerate any form of bullying, intimidation, or harassment,
- I understand that harassment includes unwanted conduct, whether direct or overheard,
- I take responsibility to challenge or report inappropriate behaviour if I witness it,
- I understand how to raise a concern using the harassment and bullying or sexual harassment disclosure form, and where to find these resources,
- I understand that harassment or bullying may lead to disciplinary action, including dismissal.



### Communication is key

If I encounter or witness a problem relating to harassment, bullying, or intimidation, I will report it to my Line Manager or the [HR Team](#). I may also choose to raise the issue by completing the relevant [Harassment & Bullying](#) or [Sexual Harassment Disclosure Form](#). I understand that all concerns will be handled with sensitivity and taken seriously, and that I will be protected from any retaliation for raising a concern in good faith.

# Protection of intellectual property and know-how

MP strictly respects the intellectual property rights of our clients, partners, suppliers, and other third parties. This includes patents, trade secrets, brands, copyrighted materials, and all forms of proprietary know-how.

We are equally committed to protecting the Group’s own intangible assets, including internal methods, technologies, designs, trademarks, and confidential information. Any idea, method, or innovation developed during the course of employment that relates to the business of MP or its clients must be disclosed and will be treated as the property of the Company.

All employees are required to maintain the confidentiality of sensitive information - both during and after employment - and to handle all data and intellectual property with integrity and in accordance with MP’s Information Security Policies and Employment Terms.

Compliant conduct
<ul style="list-style-type: none"> <li>• I respect and protect the intellectual property rights (e.g. patents, trade secrets, brands) of clients, partners, and third parties,</li> <li>• I treat all MP and client know-how, data, and proprietary information as confidential - during and after employment and I do not share or use any confidential information for personal gain or outside of authorised purposes,</li> <li>• I follow MP’s Information Security Policies when handling sensitive materials or accessing company and client systems,</li> <li>• I use Group assets only for business purposes, and only after obtaining the necessary internal authorisations. I always act in accordance with the Group’s policies.</li> </ul>

## Practical Example

**Q.** I would like to include a customer’s logo in one of my sales presentations. Can I do this?

**A.** No, I must obtain prior written authorisation from the customer before using their logo or any other brand material.



### **Communication is key**

If I have any doubts about the use of a work, confidential material, or intellectual property rights, I will speak with my Manager and my Ethics and Compliance Ambassador so they can help me seek further guidance or contact the Legal Department if needed.

## Compliance with data and information protection and security rules

We comply with all the rules governing the protection and security of data and information, both internally and for our customers and partners, in accordance with the UK GDPR and the Data Protection Act 2018. We also ensure that international data transfers comply with the UK's post-Brexit data protection framework, including the International Data Transfer Agreements (IDTAs) where applicable.

### Compliant conduct

- I am aware of, understand and comply with all Group policies on data and information protection and security including MP's [Information and Data Security Policy](#),
- I complete all mandatory training courses on data privacy, cybersecurity, and information protection,
- I protect the confidentiality, integrity, and availability of all data I access, whether it belongs to ALTEN, MP or its customers,
- I respect and follow the data protection and information security rules of our clients and partners when working on assignment,
- I do not collect, copy, or transfer any data/information without authorisation – regardless of the medium (USB, external drive, email, etc.),
- I classify internal data according to the information classification levels outlined in the [Information Classification & Handling Policy](#).



### Communication is key

If I encounter a problem relating to the protection and security of data and information, I speak with my Line Manager or contact the MP Security Controller ([p3-uk-infosec@migso-pcubed.com](mailto:p3-uk-infosec@migso-pcubed.com)).

## Data privacy

We respect individual privacy and are committed to protecting personal data. MP complies strictly with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and all other applicable local laws and regulations relating to data privacy.

We handle personal data lawfully, fairly, and transparently – whether it belongs to our employees, clients, candidates, or other third parties.

### Compliant conduct

- I am aware of, understand and comply with the Group’s policies on data privacy and personal data protection including MP’s [Data Privacy Policy for Employees](#),
- I complete all mandatory data privacy training as required by the Group, as well as the UK GDPR Training on the iHasco platform.
- I only collect, use, or share personal data when it is legally justified, in line with Group policies, and after obtaining the necessary internal approvals,
- I handle all personal data with strict confidentiality, regardless of its format or source,
- I ensure that personal data is processed fairly, transparently, and only for its intended purpose.

### Practical Example

**Q.** I’m working on a client site and have access to a list of trainees’ email addresses. Can I share these with our recruitment managers to add to the candidate database?

**A.** No. It is strictly prohibited to collect or share personal data you access during a client assignment, including names, contact details, or any other personal



#### Communication is key

If I have any questions or doubts about data privacy or the handling of personal data, I speak with the MP UK Data Protection Officer ([p3-uk-infosec@migso-pcubed.com](mailto:p3-uk-infosec@migso-pcubed.com)).

## Financial and non-financial communications

We apply the highest standards of accuracy, integrity, and transparency in all our financial and non-financial communications. Whether reporting internally or externally, we ensure that all information - from financial results to sustainability metrics - is prepared with rigour, communicated in good faith, and reflects the reality of our business activities.

### Compliant conduct

- I am aware of, understand, and follow the Group's policies on financial and non-financial communication, and I act in accordance with all applicable local laws and regulations,
- I do not disclose financial or business performance information without prior authorisation from the appropriate internal contact,
- I take care to ensure that all accounting, financial, and non-financial data I contribute to is accurate, complete, and reliable, especially when included in official documents, reports, or communications.

### Practical Example

**Q.** I am preparing an communication and would like to include financial and non-financial information about the Group. I found some relevant information on a SharePoint. Can I use this?

**A.** No, you must always contact the department responsible for the information you wish to use to obtain prior authorisation and ensure that the content is accurate, up to date and approved for disclosure.



#### Communication is key

If I have a question about the use or disclosure of financial or non-financial information, I contact the Finance or the HR department, respectively.

## Stock market regulations

We strictly comply with all applicable stock market regulations, including rules relating to insider information and the prohibition of insider trading.

Employees who may have access to confidential or price-sensitive information - directly or indirectly - must not use, share, or act on that information for personal gain or to benefit others.

### Compliant conduct

- I maintain the strict confidentiality of any sensitive, non-public, or privileged information I may access,
- Before carrying out any transaction involving ALTEN securities, I ensure that I am not in possession of insider or price-sensitive information,
- I am aware of, understand, and comply with all internal rules related to stock market regulations, including the ALTEN Stock Trading Code of Conduct,
- I never use insider information for personal gain or to benefit others, and I understand the legal and disciplinary consequences of insider trading.

### Practical Example

**Q.** As part of my role, I've been informed of the Group's half-year results before they are published. I would like to buy shares before the information is made public. Is this allowed?

**A.** No, you are not permitted to trade in ALTEN shares while in possession of non-public financial information, such as the Group's half-year results. This would constitute insider trading. You must also keep this information strictly confidential and must not advise or encourage anyone, including third parties, to trade based on it.



#### Communication is key

If I have a question about stock market ethics or the use of insider information, I contact my Ethics and Compliance Ambassador who can help me reach the Legal Department for further guidance.

## Conflicts of interest

We must act objectively and in the best interests of MP and the ALTEN Group in the performance of our duties. We avoid any situation where our personal interests - financial, professional, or otherwise - may conflict with or influence our professional judgment or responsibilities.

Where a real or potential conflict exists, it must be declared openly and managed transparently, in line with internal policies.

### Compliant conduct

- I act objectively and do my utmost to protect the interests of MP and the ALTEN Group in the course of my professional duties,
- I am aware of, understand and comply with [the Group's Conflicts of Interest Policy](#),
- I avoid any personal, financial, or professional situations that could interfere with my responsibilities or influence my decisions,
- I promptly inform my Manager or the Compliance Department of any actual, potential, or perceived conflict of interest involving me.

### Practical Example

**Q.** I'm a buyer managing a call for tenders, and one of the responses came from a company where a close relative of mine works. Do I need to report this?

**A.** Yes, this situation presents a conflict of interest and must be flagged. You should immediately inform your Manager, who will determine the appropriate preventive measures, such as appointing a neutral party to oversee key steps, introducing collegiate decision-making, or removing you from parts of the supplier selection or negotiation process.



#### Communication is key

If I encounter a situation involving a potential conflict of interest, I speak with my Manager or my Ethics and Compliance Ambassador ([compliance@migso-pcubed.com](mailto:compliance@migso-pcubed.com)).

## Fighting corruption

We apply a strict zero tolerance policy toward all forms of corruption, bribery, and influence peddling. We act in accordance with national and international anti-corruption laws, including the UK Bribery Act 2010, Section 7, which holds companies liable for failing to prevent bribery.

We act with honesty, fairness, and integrity in all business dealings and require the same of our third-party partners. We do not offer, accept, or authorise any form of bribe, facilitation payment, or kickback, whether directly or indirectly, under any circumstances.

### Compliant conduct

- I do not engage in or tolerate any form of corruption, bribery, facilitation payment, or influence peddling,
- I am aware of, understand and comply with the [Group's Anti-corruption Code of Conduct](#),
- I complete the Group's mandatory anti-corruption training and keep my knowledge up to date,
- I ensure that the necessary due diligence and integrity checks are carried out before entering into any business relationship with third parties,
- I report any suspicion or indication of corrupt activity immediately, in line with the Group's [whistleblowing procedures](#).

### Practical Example

**Q.** During a tender process, a client's employee approaches me with a proposal: they will ensure MP wins the contract if I invite them to attend an all-expenses-paid international sporting event. Should I accept?

**A.** No, offering hospitality in exchange for securing a contract is an act of corruption. This is a conditional request for personal gain, and responding to it would breach the Group's anti-corruption policy. I must refuse the request and immediately report the incident through the appropriate internal channels.



### **Communication is key**

If I encounter a situation that could constitute an act of corruption or influence peddling, I report it immediately to my Manager or my Ethics and Compliance Ambassador ([compliance@migso-pcubed.com](mailto:compliance@migso-pcubed.com)).

## Gifts and invitations

We are extremely vigilant in our business relationships and apply the principles of integrity, transparency and proportionality when it comes to offering or accepting gifts, hospitality or invitations. We refrain from any gesture that could be perceived as an attempt to influence a business decision or gain an improper advantage, in compliance with the UK Bribery Act 2010. All gifts and hospitality must be lawful, appropriate, of symbolic value, and offered or accepted in good faith and within a professional context.

### Compliant conduct

- I am aware of, understand and comply with the Group's [Gifts and Hospitality Policy](#),
- I have completed the Group's mandatory anti-corruption training, including modules on gifts and hospitality,
- I do not attempt to influence any business decision through gifts, invitations, or benefits of any kind,
- Before accepting or offering any gift or invitation, I consult the Group's policy and, where relevant, the policy of the third party involved,
- I declare all gifts or invitations I offer or receive in accordance with the internal reporting procedures.

### Practical Example

**Q. For the festive season, I'd like to give a scarf to a client to thank them for their support on a complex project. What should I do?**

**A.** First, I must check both the MP and ALTEN Gifts and Hospitality Policy and the client's own policy to ensure that such a gift is permitted. If both policies allow for symbolic gifts, I must confirm that the value of the scarf does not exceed the threshold set by either party. I then need to seek prior authorisation from my Manager before offering



#### Communication is key

If I have any doubts or questions about offering or accepting gifts and hospitality, I speak with my Manager or my Ethics and Compliance Ambassador ([compliance@migso-pcubed.com](mailto:compliance@migso-pcubed.com)).

## International sanctions and embargoes

We conduct all business activities in strict compliance with national and international economic and financial sanctions, as well as trade embargoes, applicable to the Group. MP and the ALTEN Group apply a zero-tolerance policy for any violation of sanctions laws. This includes compliance with the UK sanctions regime, EU and UN regulations, and other international frameworks as relevant to our operations.

### Compliant conduct

- I am aware of, understand and comply [the Group's policy](#) on International Sanctions and Embargoes, including [the Handbook Ethics and Compliance in a nutshell](#),
- I comply with all local, national, and international laws and regulations relating to economic and financial sanctions,
- I remain vigilant and perform the necessary due diligence and screening checks before entering into any business relationship or transaction,
- If I have any doubts about the status of a business relationship, I consult the Compliance Department before proceeding.

### Practical Example

**Q.** I'm considering entering into a business relationship with a new third party. What should I do?

**A.** Before proceeding, I must refer to the Group's official guidelines and ensure that the third party undergoes the required sanctions and compliance checks. This includes verifying that they are not listed on any sanctions lists and that the relationship poses no legal or ethical risk.



#### Communication is key

If I have a question or encounter a situation relating to international sanctions or embargoes, I speak with my Manager or my Ethics and Compliance Ambassador ([compliance@migso-pcubed.com](mailto:compliance@migso-pcubed.com)).

## Export controls and national security

We comply with all applicable export control and national security laws and regulations in every country where we operate.

### Compliant conduct

- I am aware of, understand and comply with [the Group's policy](#) on export controls and national security, including [the Handbook Ethics and Compliance in a nutshell](#),
- I act in full accordance with local and international laws and regulations governing export controls and national security.
- I am able to identify activities that may be subject to export control or national security regulations.
- I carry out all required due diligence and checks before engaging in activities or transactions related to export-controlled projects.
- I consult the Export Control Manager before proceeding with any export transaction or transfer of controlled goods, software, or technologies.
- I ensure that I have the appropriate authorisation, licenses, or access rights before using or working with controlled technology, assets, or data.
- I confirm that all necessary clearances or approvals for activities affecting national security are in place before starting the work.

### Practical Example

**Q. My mission involves transferring software, hardware or technical know-how to another country. What should I do?**

A. Certain goods, technologies or software, especially those classified as dual-use (usable for both civilian and military purposes), may be subject to export control regulations. In such cases, I must consult the Export Control Manager before proceeding, to determine whether an authorisation or export license is required.



#### Communication is key

If I encounter a situation or have a question relating to export controls or national security regulations, I speak with my Manager or the Export Control Manager ([export-control@migso-pcubed.com](mailto:export-control@migso-pcubed.com)).

## Competition law

We comply fully with competition laws and regulations, including the UK Competition Act 1998, which prohibits practices such as price-fixing, bid-rigging, market-sharing, and abuse of dominant position. We also operate in strict compliance with the principle of fair competition and we do not tolerate any behaviour that distorts or restricts competitive markets.

### Compliant conduct

- I know, understand and comply with the [Group's competition](#) policies, including [the Handbook Ethics and Compliance in a nutshell](#), and the Group's guidelines.
- I complete all mandatory competition law training courses provided by the Group.
- I refrain from having any contact or discussion with competitors without prior approval from the Legal Department.
- If I have any questions or doubts about competitive practices, I contact the Legal Department for advice before acting.

### Practical Example

**Q.** I need to respond to a customer's call for tenders and am considering forming a technical partnership with other market players. What should I do?

**A.** You must contact the Legal Department before engaging in any discussions. They will assess whether the proposed partnership is legally permissible under competition law, and under what conditions it can proceed to ensure full compliance.



#### Communication is key

If I have to deal with a competitor in any context, I first speak with my Manager or my Ethics and Compliance Ambassador who will help me contact the Group Legal Department.

## Charities, donations, sponsorship

We are committed to making a positive and responsible impact on civil society through our corporate sponsorship, charitable donations and local initiatives (particularly in the social, environmental and health sectors). We carry out these actions in full compliance with local laws and regulations.

### Compliant conduct

- I am aware of, understand and comply with [the Group's policies](#) relating to charitable activities, sponsorships, and donations,
- I ensure that the necessary due diligence checks are carried out before engaging in any charitable or sponsorship initiative,
- I follow the Group's authorisation process before launching or participating in any sponsorship, donation, or volunteer activity on behalf of the company,
- I ensure that all initiatives I promote are free from personal interest or improper influence, and aligned with the Group's values.

### Practical Example

**Q.** I would like to support a charity project through the company. What should I do?

**A.** You should first inform your Manager, then contact the Corporate Social Responsibility team within MP UK. You can reach the CSR Steering Group via Mark Sorrell at [mark.sorrell@migso-pcubed.com](mailto:mark.sorrell@migso-pcubed.com) to ensure the project aligns with the Group's values and follows the correct approval process.



#### Communication is key

If I have a question about donations, sponsorship, or charitable activities, I speak with my Manager and contact the CSR Steering Group ([mark.sorrell@migso-pcubed.com](mailto:mark.sorrell@migso-pcubed.com)).

## Lobbying

We are committed to conducting all lobbying activities in full compliance with applicable local laws and regulations and in compliance with the UK Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014. All lobbying engagements and political donations must be transparently disclosed and reviewed to ensure regulatory compliance.

### Compliant conduct

- I obtain prior approval from the Group's General Management before undertaking any lobbying activities,
- I strictly comply with all applicable regulatory obligations, including registration and reporting duties.

### Practical Example

**Q:** I want to lobby for changes to legislation related to innovation. What should I do?

**A:** You should first contact the Legal Department. They will coordinate with the Group's General Management to assess the request and define the appropriate conditions and procedures to be followed.



#### Communication is key

If I have a question about lobbying, I speak with my Manager or my Ethics and Compliance Ambassador who will liaise with the legal department to ensure the appropriate guidance is provided and that all activities remain compliant.

## Human rights

We are committed to respecting and promoting human rights in all aspects of our operations, in line with the UK Modern Slavery Act 2015.

We uphold working conditions that safeguard the fundamental rights of all workers, including the right to fair and decent working hours. We strictly prohibit all forms of modern slavery, forced labour, human trafficking and child labour.

We work exclusively with suppliers and partners who share our values and demonstrate compliance with applicable legal obligations as well as our internal standards.

### Compliant conduct

- I ensure that human rights are respected and upheld within my area of responsibility and contribute to promoting them across the wider business,
- I make sure our partners are informed of, and committed to, the principles outlined in the [Responsible Purchasing Charter](#),
- I verify that all necessary due diligence checks are completed before establishing any new business relationship.

### Practical Example

**Q.** I've discovered that a potential third-party partner of MIGSO-PCUBED or the ALTEN Group has been convicted of human rights violations. What should I do?

**A.** You must refrain from engaging in any business activities with this third party and immediately inform your Manager and the Compliance Department.



#### Communication is key

If I become aware of a human rights issue or have a related concern, I speak with my Ethics and Compliance Ambassador ([compliance@migso-pcubed.com](mailto:compliance@migso-pcubed.com)).

## Environment and sustainable development

We are committed to reducing our environmental impact and adhering to applicable environmental laws. We comply with international standards and are ISO 14001 certificated. Our actions are guided by our CSR initiative Deliver Green Together, which promotes responsible purchasing, low-carbon practices, and eco-efficient digital solutions.

All employees are required to complete Environmental Awareness training, reinforcing our shared responsibility for sustainability. We also follow the UK Government’s Carbon Reduction Plan (PPN 06/21) as part of our path to net zero, which we publish annually.

Through these measures, we actively support sustainable development and the delivery of ALTEN’s ‘*Responsible Digital Business*’.

### Compliant conduct

- I ensure compliance with relevant environmental laws and regulations,
- I am aware of, understand, and respect the [Group’s environmental and sustainability direction](#).
- I attend the awareness and training sessions organised by the Group (e.g., Environmental Awareness),
- I adopt environment-friendly behaviours in my daily work,
- I ensure our commercial partners comply with environmental regulations and our Group’s sustainability expectations.

### Practical Example

**Q.** How can I contribute to reducing MIGSO-PCUBED’s environmental footprint?

**A.** I can support the Group’s sustainability goals through simple everyday actions—such as switching my computer to standby mode, sorting waste, choosing videoconferencing over travel whenever possible, and using public transport.



#### Communication is key

If I have a question or concern about environmental or sustainable development matters, I speak with my Manager.

## Protecting the image of the Group, our customers and partners

We are the guarantors of MIGSO-PCUBED and the ALTEN Group’s image and it is therefore our duty to act responsibly and ethically in all circumstances.

We must avoid behaviours - whether in our professional actions, communications, or online presence - that could harm the reputation of the Group, our customers or our partners. It is essential that we exercise professionalism, protect confidential information, and communicate in ways that are respectful, accurate, and aligned with company policies and values. This includes how we use social media, email, and internet tools provided by the company.

### Compliant conduct

- I behave responsibly, professionally, and with vigilance at all times to protect the image of MIGSO-PCUBED and the ALTEN Group,
- I use social media and professional networks wisely, ensuring that my posts reflect our values and commitments,
- I ensure that my email and internet communications are respectful, accurate, and comply with internal policies,
- I avoid engaging in any online or in-person activity that could damage the reputation of the Group, its clients, or its partners,
- I respect MIGSO-PCUBED’s [Graphic Charter](#) when creating or sharing communication materials.

### Practical Example

**Q.** I’m preparing a corporate event. What should I do?

**A.** I make sure the event reflects the professional image of MIGSO-PCUBED and the ALTEN Group. I remind my team of the expected standards of conduct, including appropriate behaviour, respectful communication, and alignment with the Group’s values and branding guidelines.



#### Communication is key

If I am faced with a situation that could harm the image of MIGSO-PCUBED, the ALTEN Group, our clients or our partners, I speak with my Manager and inform the Marketing and Communications Manager ([communication@migso-pcubed.com](mailto:communication@migso-pcubed.com)).

### III. WHAT SHOULD YOU DO IF YOU HAVE QUESTIONS RELATING TO ETHICS?

Any MIGSO-PCUBED/ALTEN Group stakeholder (internal or external) who witnesses or is the victim of an act contrary to the Ethics Charter may report it via the secure platform using the whistleblowing system: <https://alten.integrityline.com/>, in accordance with the Public Interest Disclosure Act 1998 (PIDA). Alternatively, you can also use the [MP Whistleblowing Disclosure Form](#).

If I have any doubts or questions about the ethical guidelines (Ethics Charter, Anti-Corruption Code of Conduct, gifts and entertainment policy, etc.) or a situation relating to business ethics (corruption, conflicts of interest, etc.), I can consult the [HR Team](#), my Manager, my Ethics and Compliance Ambassador ([compliance@migso-pcubed.com](mailto:compliance@migso-pcubed.com)) or the Group Compliance Department ([compliance@alten.com](mailto:compliance@alten.com)).

MIGSO-PCUBED and ALTEN Group protects whistleblowers who, in good faith and without direct financial compensation, report an illegal act or risks of harm to the general interest. Every effort is made to protect the confidentiality of whistleblowers.

Version	Year of publication	ALTEN Group reference document	Comments on version
V1	2011	EPO-GRI-002-V1-C0-FR	Cancelled and Replaced

# MIGSO-PCUBED

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