



COMMUNICATION ON PROGRESS (COP)

Period covered by our Communication on Progress (COP):
06/06/2016 - 09/19/2018

1. STATEMENT OF CONTINUED SUPPORT BY NEOXAM'S CEO

Paris, on the 19th of September, 2018

To our stakeholders:

I am pleased to confirm that NeoXam reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Sincerely yours,

AURELIUS PARTNERS, CEO of NeoXam SAS,
duly represented by Mr. Serge Delpla

Signature:

2. DESCRIPTION OF NEOXAM ACTIONS

The ten principles protected and promoted by the United Nations Global Compact are a natural component of the NeoXam Group's DNA and have therefore been fully integrated by NeoXam Group, since its origin, in its internal policies. Those principles are also strategic for our Group as our customers are very attentive to the Corporate Social Responsibility process engaged by their providers.

The actions implemented by NeoXam are the following:

❖ Human rights

As a software editor, NeoXam Group runs an activity whose nature doesn't threaten or harm human life. Our Group pays nevertheless close attention to its employees' safety, and to their physical and psychological health.

To do so, the main actions carried out by NeoXam are the following ones:

- NeoXam ensures to provide safe, suitable and sanitary work facilities wherever our activities are performed, around the globe.
- NeoXam protects its employees from any kind of workplace harassment (including physical, verbal, sexual or psychological harassment), abuse or threats. Such behaviors are expressly prohibited and punished under the Group internal rules, in addition to local applicable laws. Local internal rules are currently being reworked to establish a global Code of conduct.
- Moreover, in order to enable any employee to easily alert the top management of any kind of unadapted behavior or event, including those threatening employees' safety or health, NeoXam will enlarge the current whistleblowing process already implemented within a part of its affiliates.

❖ Labour

- NeoXam ensures not to participate in any form of forced or bonded labor, directly through its affiliates, as well as indirectly through its suppliers; and complies with minimum wage standards locally applicable to either NeoXam's affiliate.
- Furthermore, NeoXam ensures that employment-related decisions are based on relevant and objective criteria, to fight against any kind of discrimination and promote equity and equality of treatment.
- Beyond its actions against discrimination, NeoXam also encourages the respect of individual differences, either in its quality of employer, or as a business player.

This will have been translated into a Diversity policy enforced within all NeoXam's entities:

- In NeoXam's eyes, diversity of its employees, worldwide, embraces all differences that make individuals unique. Among these are nationality, ethnic origin, language, gender, age, physical abilities, sexual orientation, culture, religion, education, beliefs, and life experiences. When we think of inclusion, we think of behaviors that show that Diversity is welcome and that no one will be shelved or treated differently because of their differences.

- NeoXam is proud of the Diversity of its employees and continuously cultivates a corporate culture in which people from varied backgrounds have actual equal opportunities of success, limited only by their personal ambition, skills and efforts.
- The safety of its employees is another point of attention for NeoXam:
 - To identify safety risks for its employees and take relevant actions mitigating them, Neoxam is accompanied by an internal Health Safety and Working Conditions Committee (French “CHSCT”), as well as the competent Occupational Health Doctor.
 - Furthermore, NeoXam has wished to carry out actions beyond its legal obligations, by closely working with its employees on the quality of life at work. In this context, actions such as the intervention of an ergonomist were conducted to enhance workstation ergonomics.

❖ Environment

As a software editor, NeoXam’s activity doesn’t have major effects on the environment.

Nevertheless, NeoXam being sincerely convinced that anyone has the power to protect the environment through small or bigger actions taking part to global changes, we pay attention to select suppliers, especially IT manufacturers, environmentally aware:

- Our equipment choices are therefore made on the basis of the highest environmental standards including ISO 14001 and energy star label or similar.
- NeoXam is additionally attentive to recycle its products (including IT equipments, batteries, bulbs, papers) throughout appropriate networks.
- Our company ensures to limit its energy consumption by turning all the lights off and the climatization system at the end of each working day, and by setting automatic sleep modes on its employees’ IT equipments.
- Furthermore, NeoXam encourages alternative means of transport and alternative work organization modes:
 - NeoXam encourages common transportation and cycling:
 - (i) by granting transportation indemnities to the employees who regularly come to the office by riding a bicycle;
 - (ii) through the implementation of dedicated areas to ease the parking of the bicycles;
 - (iii) by limiting the number of its company cars;
 - (iv) through the reimbursement of a significant part of the common transportation costs born by its French employees to go to work.
 - NeoXam promotes alternative work organization modes:
 - (i) By encouraging remote meetings (e.g via Skype and webcams) when employees implied are not located on the same site;
 - (ii) by promoting teleworking for its employees whose home is far from their workplace.

❖ Anti-Corruption / Business ethics

As an editor of software programs dedicated to financial entities, who operates within a strong regulatory framework, NeoXam has a natural sensitivity to anti-bribery and anti-money-laundry issues.

But we deeply think that ethics in business shall go beyond law enforcement. Our approach is to act with honesty and integrity in all aspects of NeoXam's activities, even in the absence of any particular legal or administrative obligation.

- Such an approach leads our choices regarding our providers, as well as our customers, and is transcribed in our contracts through adapted specific clauses, incl. through "anti-corruption", "ethical behavior" and "conflict of interest" provisions in order to:
 - Avoid any conflict of interest that may interfere with, influence or alter the conclusion or performance of a contract.
 - Ensure the parties comply with the provisions for combatting corruption applicable (to both public and private sectors), as such, that the parties, their employees and corporate officers, will not (directly or indirectly) offer or receive offers, promises, donations, gifts, presents, or advantages of any kind, for themselves or others, for the purpose of performing or refraining from performing or facilitating an act in violation of their obligations under laws and/or professional rules and/or the contract.
 - Ensure the parties comply with the provisions for combatting money laundering and terrorism financing, as such, that the parties undertake, within the framework of their relations under the contract and in compliance with the applicable provisions in force, to cooperate closely in the implementation of their respective obligations with regard to the fight against money laundering and terrorism financing.

Additionally:

- NeoXam's ethical commitments have been translated into some internal rules, incl. inside NeoXam's ethics and conformity charter, which is under rewriting to date.
- And, this topic will also benefit from the broadening of the current internal whistleblowing process already locally implemented in some entities of our Group.

3. MEASUREMENT OF OUTCOMES

Outcomes resulting of the actions carried by NeoXam over the past 2 years have not all been measured yet, but on the basis of the measurement finalized and presented hereafter, our progress can be identified concerning the protection and promotion of the fundamental principles and rights defended by the UN Global Compact Program, that NeoXam has chosen to embrace in 2016.

❖ No gender based discrimination / key figures

- In June 2018, women represented 1/3 of our Group's workforce. We are proud to highlight that the share of women is expected to increase further in relation to the proportion of women in new hirings.

Total employees of NeoXam Group (06/2018)		
	# of employees (worldwide)	% difference (worldwide)
Male	331	66,33%
Femal	168	33,67%
Total	499	100,00%
New hires in 2017/18		
	# of employees (worldwide)	% difference (worldwide)
Male	90	54,88%
Female	74	45,12%
Total	164	100,00%

- The following analysis of 2018 individual increases in a representative population of 236 French employees (hired before the 1st of January 2018 and not leaving the Group) is a good indication of NeoXam's intent to protect its female employees against wages gender discrimination :

	# of employees considered	Rate of individual wage increase
Male	51	2,5%
Female	185	2,4%
Total	236	2,4%

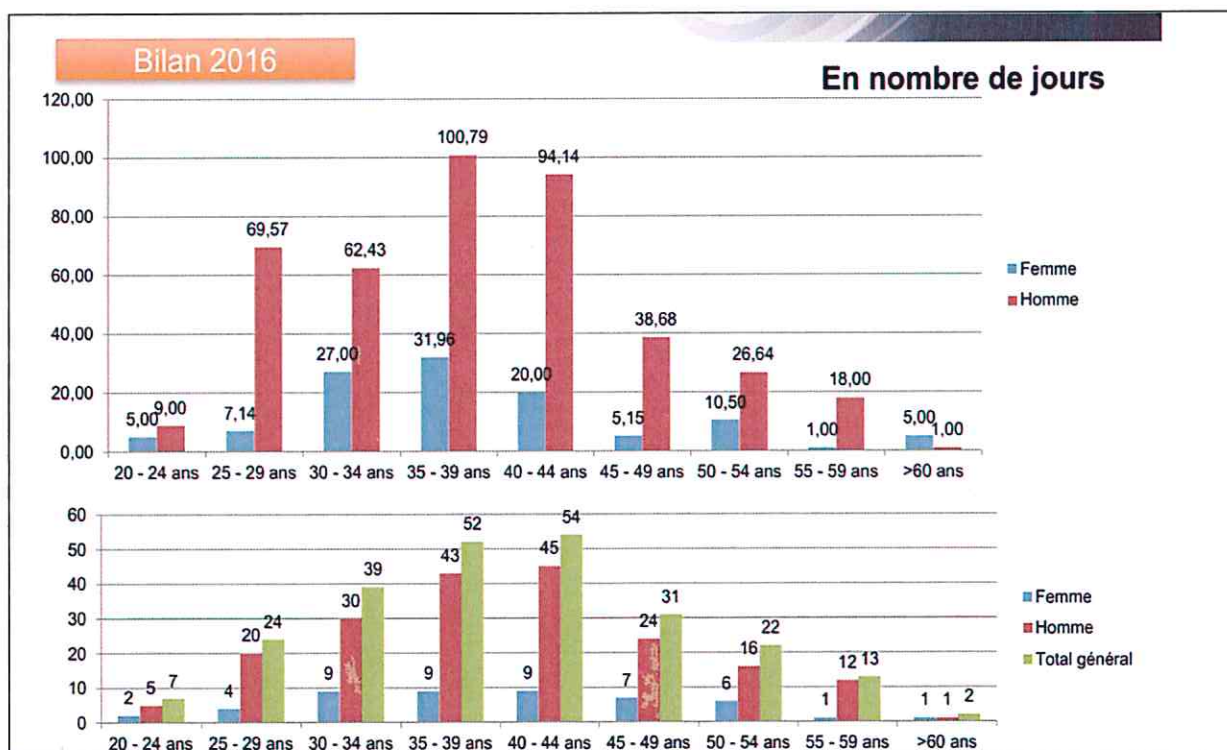
- The analysis of the training actions carried out by NeoXam for its French employees is another demonstration of our commitment in fighting against gender discriminations:
- In 2016, whereas 63.52% of our total French workforce had been trained, the portion of female beneficiaries was of 68,75%.

❖ No age based discrimination – key figures

- The analysis of 2018 individual increases in a representative population of 236 French employees (hired before the 1st of January 2018 and not leaving the Group) demonstrates that all of the age groups represented in NeoXam's workforce has been granted some wage increase.

Age groups	# of employees considered	Rate of individual wage increase
<25 year old	3	11,6%
25 – 30 year old	17	7,0%
30 – 35 year old	42	3,5%
35 – 40 year old	49	2,9%
40 – 50 year old	87	1,9%
>50 year old	38	0,8%
Total	236	2,4%

- The review of trainings carried out in 2016 is another good indication of NeoXam's intent to protect senior employees against discriminations, as the figures demonstrate that all of the age groups represented in NeoXam's workforce had attended a training.



- Since october 2017, a specific plan (French « Contrat de génération ») has entered into force within NeoXam's French companies, in order to promote a sustainable integration of young people into employment, the hiring of older employees as well as the and enhancement of their employability, and the share of knowledge accross the different age groups of NeoXam's workforce. All the actions planed have been launched to date, and NeoXam expects to be able to measure some of their effects by the following Communication On Progress (COP).

❖ **Actions carried out within the scope of NeoXam's Handicap Program**

Concerned by disability issues, NeoXam has decided to lead different actions to the benefit of its employees as well as of people affected by any disability outside its organization:

- In order to protect its employees who may be affected by a disability, NeoXam has worked with them on the recognition of their disabled worker status.

- In order to act against the effects of disability on employment, NeoXam has decided to buy services from companies employing disabled workers:

(i) with a partnership with a consulting company employing a disabled person and advising us on the implementation of action plan relatively to disability issues;

(ii) by contracting with other companies employing disabled workers, for the following needs: purchase and maintenance of green plants (*ESAT / APAJH*) ; purchase of meal trays and gourmet coffees; telephone reception (*Handivia*) ; purchase of office supplies

- Additionally, over the past two years, we have carried out the following actions:

(i) the organization of internal workshops aiming at awaring and demystifying disabilities,

(ii) the assistance of some employees in the recognition of their disabled worker status (4 files in progress and 1 recognition obtained)

(iii) the organization of a conference presented by a disabled speaker on the theme "surpassing oneself"

(iv) Participation in a job forum specially dedicated to disabled workers (*Talents Handicap*)

(v) All published job ads state that applications by disabled candidates are welcomed.

❖ **Actions carried out to promote alternative work organization and transportation modes**

- Remote meetings are encouraged: 19 meeting rooms around the world are equipped with accurate equipments, including 10 meeting rooms in Paris.
- Teleworking promotion has reach a significant level as 1200 working days are actually realized remotely per year in France.
- NeoXam encourages common transportation by reimbursing to about 200 of its French employees half of their common transportation costs to go to NeoXam's Parisian workplaces.

❖ **Recycling – detailed actions and measures**

- NeoXam aims at recycling 100% of its products and equipments throughout the appropriate networks. To do so, we recycle most of our IT equipments through their manufacturers and distributors, and donate the other part of it to associations and schools:

- 12 notebooks have been donated to a school located in Noisy le Grand – France, after having wiped their HDD and reinstalled a free operating system ;
- 18 computers have been donated and 25 screens have been donated to an association in charge of their reuse.
- Concerning the coffee pods provided to our employees for free, their recycling rate has reached to date 100%.
