



COMMUNICATION ON PROGRESS (COP)

Period covered by our Communication on Progress (COP): 09/19/2018 - 09/19/2019

1. STATEMENT OF CONTINUED SUPPORT BY NEOXAM'S CEO

Paris, on the 19th of September, 2019

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:

A handwritten signature in black ink, appearing to read 'Serge Delpla', with a horizontal line underneath.

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 inadequate behavior or event, including those threatening employees' safety or health, NeoXam is enlarging the current whistleblowing process already implemented within a part of its affiliates to all of them.

› 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 has 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 "Commission Santé, Sécurité et Conditions de travail") 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 work life. In this context, a working group has been put in place, bringing together different representatives of the group: Executive Committee, internal communication, employee representatives, facilities and HR. The group decides each year the actions to implement, such as the intervention of an ergonomist to enhance workstation ergonomics, conferences, intervention of a sophrologist, improvement of rest areas (decoration, games, walls of expression, etc.), etc.

› Environment

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

However, NeoXam has implemented an Environmental Policy, is committed to a sustainable ecosystem and aims to control and reduce the environmental footprint of its products and processes throughout their entire life cycle.

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 and office furniture, environmentally aware:

- Our equipment choices are therefore made based on the highest environmental standards including ISO 14001 and energy star label or similar. Moreover, NeoXam promotes the purchase of second-hand furniture, and reconditioned computer equipment, Eco labeled and certified environmental hygiene products and supplies.

- NeoXam is additionally attentive to recycle its products (including IT equipment's, batteries, bulbs, Ink cartridge recycling, waste recycling: cardboard, paper, plastic, coffee capsules...), 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 equipment.
- Furthermore, NeoXam encourages alternative means of transport and alternative work organization modes:
 - NeoXam encourages common transportation and cycling:
 - (i) by setting up transport shuttles in countries with limited public transport facilities to avoid the use of more polluting personal cars;
 - (ii) through the implementation of dedicated areas to ease the parking for employees who come to work with their personal bikes;
 - (iii) by limiting the number of its company cars;
 - (iv) through the reimbursement of a significant part of the common transportation costs borne by its employees to go to work.
 - NeoXam promotes alternative work organization modes:
 - (i) By encouraging remote meetings (e.g via Skype/Teams 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 ethic

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, approved by the employee representatives and being communicated.
- 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

Based on 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/ age-based discrimination – key figures

a. No gender-based discrimination

- **Recruitment:**

In October 2019, women represented 1/3 of our Group's workforce. We are proud to highlight that the percentage of women hired in 2019 has significantly raised and we hired more women than men to improve the proportion of women in the headcount.

Total employees of NeoXam Group (10/2019)		
	# of employees (worldwide)	% difference (worldwide)
Male	320	66,39%
Femal	162	33,61%
Total	483	100,00%
New hires in 2019		
	# of employees (worldwide)	% difference (worldwide)
Male	35	46.67%
Female	40	53.33%
Total	75	100,00%

- **Wage increase:**

The following analysis of 2019 individual increases in a representative population of employees in France (hired before the 1st of January 2019 and not leaving the Group) is a good indication of NeoXam's intent to protect its female employees against wages gender discrimination. Amongst 61 employees receiving a wage increase in 2019:

	# of employees considered	Rate of individual wage increase
Male	39	4.8%
Female	22	4.3%
Total	61	4.65%

- **Training:**

The analysis of the training actions carried out by NeoXam for its employees in is another demonstration of our commitment in fighting against gender discriminations:

All employees are trained each year on courses necessary to ensure the safety of equipment, workspaces and people.

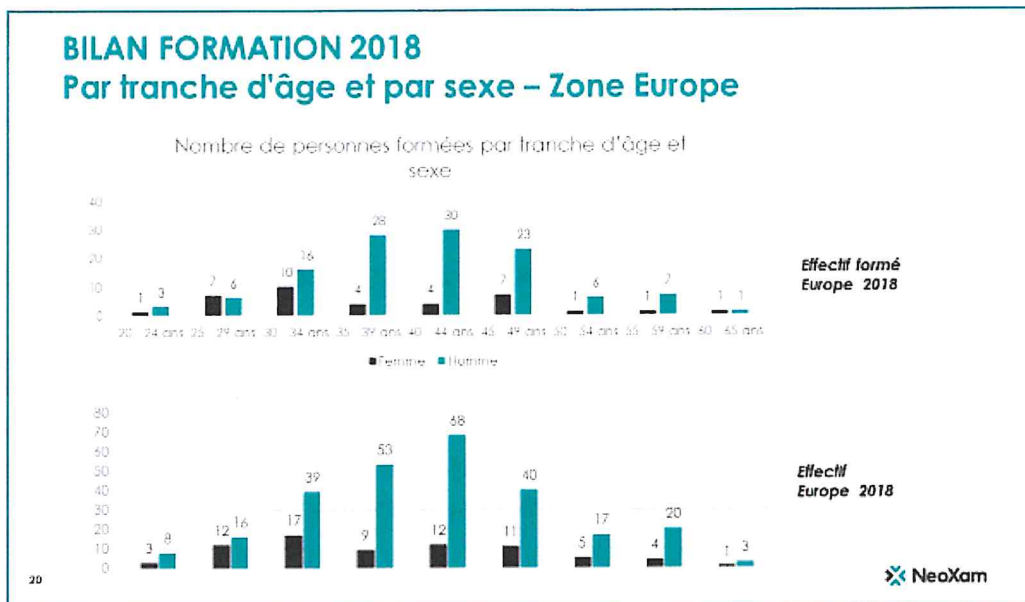
The analysis of the total courses shows, for example in Europe, that employees are trained in skills that promote their technical and personal effectiveness regardless of gender. Thus, in 2018, 46.15% of our workforce had been trained, and amongst them 48.65% of women received a training during this year.

b. No age-based discrimination

- The analysis of 2018 individual increases in a representative population of 236 employees in France (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 2018 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.



➤ 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 (1 recognition obtained)

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

- (iv) 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 equipment, including 12 meeting rooms in Paris.
- Teleworking promotion has reached a significant level as all employees worldwide can work remotely
- NeoXam encourages common transportation by reimbursing to about 300 of its employees in different countries part of their common transportation costs to go to NeoXam's workplaces; mainly in France, China and Tunisia.

➤ **Recycling – detailed actions and measures**

- NeoXam aims at recycling 100% of its products and equipment throughout the appropriate networks. To do so, we recycle most of our IT equipment through their manufacturers and distributors.
- NeoXam has set up water fountains with filtered water to avoid the waste that water bottles represent
- Concerning the coffee pods provided to our employees for free, their recycling rate has reached to date 100%.
- When office equipment needs to be modified, unnecessary furniture is given to associations

➤ **Prevention and lifestyle: NeoXam encourages employees to go green:**

- Impression Limitation Policy
- Communication for sustainable development of NeoXam
- Communication on raising awareness of "eco-responsible" actions in companies
- Access to organic foods
- Encourages employees to use public transportation/ bicycles
