



WAVESTONE

Business Ethics charter

Wavestone is committed to being a trusted partner by maintaining a transparent, responsible, and sincere relationship with its various stakeholders (clients, employees, suppliers and partners). The purpose of this charter is to present the principles that enable us to drive behaviors in our day-to-day activities. Each employee, acting as a Wavestone ambassador, must commit to respect and adopt these principles, and report any situation that one feels does not comply with this charter. The same applies to our subcontractors.

This charter is based on the principles of the [Middlenext code of conduct](#).

Honesty & loyalty

Wavestone employees are sincere and transparent in their dealings with all stakeholders.

Towards customers

Wavestone is committed to:

- Make tenable commitments in any commercial offers to customers;
- Provide trustworthy data throughout the business relationship (business references, CVs, assignment progress etc.);
- Work with all customers' suppliers (when existing) with loyalty and fairness.

Towards suppliers

Wavestone is committed to:

- Act fairly, transparently and impartially towards all bidders, during all phases of the selection process for a new supplier;
- Fulfill its contractual commitments to suppliers, particularly in terms of payment deadlines, confidentiality agreements, and non-solicitation agreements;
- Ask its subcontractors to fully commit to all the principles of this charter.

Data protection

As a responsible player, we do everything in our power to ensure the protection of sensitive data.

Wavestone is committed to:

- Guarantee the confidentiality of customer and supplier data, including personal data, by default;
- Comply with any NDA or confidentiality and security clause contained in a contract signed between Wavestone and a client or supplier, in line with Wavestone's security procedures.

Conflicts of interest

Employees perform their duties in a selfless manner. As such, they must avoid any situation of conflict of interest.

Wavestone is committed to:

- Prevent conflicts of interest and unfair competition;
- Inform clients and partners of any such situation as soon as it is identified;
- Comply with the law and competition rules when responding to calls for tender.

Gifts & invitation

- Gifts and invitations must not be such as to call into question the impartiality of the parties in current or future dealings;
- The gift or invitation must be offered within a professional context. Its value must be in line with the firm's guidelines.



In addition to the FAQ and mobilization of management and HR teams, two channels are available to support employees and facilitate reporting of alerts:

- [Whispli](#), an anonymous alert system accessible to all,
- [Ethics Officers](#), who can be contacted directly at ethicsofficers@wavestone.com

These channels can be used to ask any questions related to the charter and its application, to report situations that seem inappropriate, and to help define the most appropriate response.

