



Code of Conduct (CoC)

Third version (20/04/2026)





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Integrity

Be always honest and don't make promises unless you know you can keep them.

Respect

Without exception, treat every individual with dignity and respect—customers, employees, partners, vendors, competitors and strangers.

Service excellence

No matter how strong our software solutions, none of this matters without passionate customer service assuring your success. We are committed to serving our customers and service in general.

Value

Time and resources are precious. We seek to create value in everything we do by providing the highest quality and most affordable solutions for our customers.

Happiness

We believe it's easier to help our customers achieve safer, more sustainable success when we have fun along the way and promote the well-being of all. Achieving challenging goals with a servant's heart can bring its own satisfaction and happiness. Making our work and our workplace enjoyable makes work sustainable.



**Values That Drive Us to
Deliver Exceptional
Products and Services**



Purpose and scope

A Code of Conduct (CoC) is a common tool used by organisations of all kinds to establish and communicate responsible business practices and an ethical organisational culture. This document is designed to explicitly define the behaviour expected of **Lisam Group** associates in line with our values.

At **Lisam Group**, we adhere to a set of fundamental principles and standards that guide our ethical conduct in all our dealings with shareholders, customers, suppliers and authorities, as well as with everyone who engages with us.

These principles set out the ethical responsibilities of our directors, associates, external contractors, public officials and occasional collaborators (such as temporary associates, students and trainees).

These principles apply to all **Lisam Group** associates, regardless of their position, location or workplace. The purpose of this Code is not to list or explain all the laws and regulations in which **Lisam Group** operates. Local laws therefore prevail, if they are more restrictive, than the principles that are explained in this document. This Code of Conduct (CoC) has been established to guide our associates in their behavior in certain situations.

The scope of this Code of Conduct (CoC) includes the Lisam Connect and Lisam EH&S Software companies

➔ **Lisam Connect :**

- Hemmis
- Dinec International
- Dinec Assembly by HTS
- MegaByte Applications
- MegaByte Consulting
- Spiece

➔ **Lisam EH&S :**

- Lisam Systems et ses filiales étrangères
- Lisam.Cloud
- EcoMundo

➔ **WikiChemia**

N.B. : all the examples cited in this Code of Conduct (CoC) are hypothetical examples and not cases already encountered in the past.





Respect for human rights

To foster this respect within **Lisam Group**, we implement comprehensive policies and initiatives designed to uphold the dignity, equality and freedom of every individual.

Fundamental principles and rights at work

At **Lisam Group**, we foster a culture based on loyalty, respect and honesty in our dealings with our associates, customers and stakeholders. This include:

- ✔ A firm commitment to respecting people's dignity, freedom and privacy, by creating a working environment that enables our diverse workforce to fulfil their full potential.
- ✔ A compliance with the laws of the countries in which **Lisam Group** operates, as well as with the principles of the United Nations Global Compact (UNGC) and the International Labour Organisation (ILO) aimed at eliminating all forms of forced labour.
- ✔ A refusal to enter into a contract or the termination of a contract with any supplier or service provider that breaches laws on forced labour and child labour.
- ✔ A rejection of all forms of discrimination and opposition to any behaviour aimed at hindering, restricting, diminishing or denying the recognition of human rights and freedoms.
- ➔ We firmly believe that diversity within our workforce, in an environment characterised by equal rights and responsibilities, enhances both our human and professional value.





Moral harassment, sexual harassment, and violence

'Workplace violence' refers to any situation in which associates or others are stalked, threatened or physically assaulted in the course of their work.

'Moral harassment' in the workplace means a series of several abusive behaviours, whether external or internal, which occur over a period of time and which have the effect of undermining the personality, dignity or physical or mental integrity of an associate.

'Sexual harassment' means any act or behaviour which is intended to show contempt for a person on the grounds of his or her sex or which, for the same reason, regards a person as inferior or as essentially reduced to his or her sexual dimension and which results in a serious attack on his or her dignity.

VOUS MUST ALWAYS

- ✔ Show respect towards your colleagues ;
- ✔ Refrain from any form of harassment, however it may be defined in each country, whether within the company or in relation to the **Group's** customers, suppliers or partners;
- ✔ Managers should ensure that employees are able to speak freely within the company about issues relating to their working conditions.

Situation : I feel very uncomfortable because the head of my department keeps asking me out to dinner. I am afraid to tell him to stop because I think it might backfire.

- ➔ Such behaviour is inappropriate. Harassment can cause distress and make even someone in a position of responsibility feel vulnerable. You must immediately report any instances of harassment or bullying of which you are aware to the designated contact person via ESG@lisam.com and/or complete the questionnaire on **harassment and violence in the workplace**.





Safety and health at work

We firmly believe that the well-being of our employees, in terms of health and safety at work, is just as vital as any other function or business objective. We strictly prohibit any behaviour that jeopardises the safety or well-being of our staff, customers, suppliers or other visitors to any of our premises. This includes:

- ✔ Create a safe working environment by maintaining appropriate equipment and work systems.
- ✔ Preventing psychosocial risks in the workplace by providing contact persons and the necessary information to ensure associates well-being.
- ✔ Comply with the relevant legal regulations and implement safety procedures.
- ➔ For further information, please refer to the **Occupational Health and Safety (OHS) Policy**. Please note that the Belgian subsidiaries have access to a health and safety adviser and two trust persons in the event of a risk to well-being at work.

Situation : An associate was recently involved in an accident at work. It wasn't very serious, so some of our colleagues encouraged him not to report it so as not to affect our zero accident targets.

- ➔ Workplace accidents must be reported promptly to the managers of each subsidiary/office. These reports ensure that associates receive appropriate medical care and that steps are taken to ensure all necessary safety measures are put in place.





Respect for our resources

At **Lisam Group**, we recognise that our associates worldwide may have access to materials, supplies, equipment and intellectual property belonging to **Lisam Group** or our clients. We respect the rights associated with all forms of property and regard information as a valuable corporate asset that we handle with care and integrity.

Use of assets

All associates members are required to use the company's tangible and intangible assets, as well as those of its subsidiaries, customers and other stakeholders, in a responsible manner. Tangible assets include cash, premises, office supplies and equipment, while intangible assets include the brand, customer base, trade marks, copyright, patents and other intellectual property of the company.

Lisam Group expects its associates to use these assets efficiently to help achieve the company's objectives. It is essential that resources are used responsibly, solely for the benefit of the company. Although equipment, such as computers, is provided for business purposes on behalf of **Lisam Group**, private use for personal activities is permitted. However, personal use must not interfere with the running of **Lisam Group**'s business operations.

Situation : A visitor to a **Lisam Group** site is stuck at a door to which I have access. What should I do?

- You must not grant access to visitors without meeting them first. In the case of a building managed by **Lisam Group**, visitors must complete a visitor log, noting their arrival and departure times.





Information technology security

Lisam Group recognises its collective responsibility for safeguarding and maintaining the security of the information it manages through our ISO 27001* certification. With this certification, **Lisam Group** implements a comprehensive Information Security Management System (ISMS) to protect sensitive information and ensure the confidentiality, integrity and availability of data. This includes implementing access protection for accounts and passwords assigned to these resources, as well as recognising the crucial importance of managing them responsibly.

Associates of **Lisam Group** must be aware of the difference between:

- ✔ “Teleworking”, which is the exercise of a professional activity carried out in whole or in part at a distance from the place where the result of the work is expected. It could be in a client's office or you may have to work from a hotel (the WIFI must be password protected!).
- ✔ “Home working” is the same definition as teleworking, but you need to be in a personal or family place.

You must also let your manager know if you change your location when working remotely.

Situation : During my teleworking days, I sometimes check sensitive emails in public places such as airports or train stations. Is it OK for me to work in public if others can see what I am working on?

- It is permissible for you to work in public spaces as long as you: take steps to keep the information private from public viewing, this is done on a temporary basis, and you must be connecting to a private WIFI (it's necessary to have a password). If it's not the case, it's considered a non-secure connection, and it's prohibited.

*ISO 27001 is only applicable to the offices in Nivelles, Écaussinnes and Lisam.Cloud.





Information and intellectual property management

Lisam Group associates are prohibited from disclosing confidential information about the company. Only designated official spokespersons are authorised to share such information with the media. It is important to note that trading on the basis of inside information or using such information for personal financial gain is illegal.

Situation : I receive a market study for a benchmark and am asked to provide information about the company. Is it okay to share commercially sensitive information?

→ No. Sensitive information about **Lisam Group** is confidential.

The associates of **Lisam Group** are committed to protecting all confidential information, including trade secrets, processes, methods, strategies, plans, projects, technical or market data, and any other sensitive information. We respect the confidentiality of this information even after our employment relationship has ended, extending this commitment to confidential information arising from previous collaborations with other companies.

Situation : During a Teams call with a client, my colleague recorded the call on their phone to capture all the details and avoid having to take handwritten notes. We didn't tell anyone during the call that it was being recorded.

→ Recording calls or meetings is not permitted and contravenes data protection regulations. However, where necessary and with the consent of those concerned, recording is permitted.

Furthermore, associates are required to report any instances of disclosure of confidential information, misuse of information or infringement of intellectual property rights, in accordance with company policy. Reports should be sent to the appropriate email address.





Personal data

The associates at **Lisam Group** handle the collection and processing of personal data responsibly and with due care. We ensure compliance with all applicable data protection laws and regulations in every country where we operate. We ensure that this data is used only for the purposes for which it was collected, unless consent is obtained or there is a legal obligation to the contrary. Associates are then required to:

- ✔ Classify and process all information relating to the **classification matrix**.
- ✔ Be connected to a VPN to handle any confidential data. Such data may be stored on a local hard drive for a very limited period and only if no other alternative is available. All removable and storage media (CD-ROMs, USB sticks, tapes, etc.) are treated as confidential by default.
- ✔ Remove all paper documents and data storage media marked as confidential or if an authorised person is not at their workstation.
- ✔ Not keep any records (digital files, emails, paper documents, sticky notes, etc.) of your login details and change these details if they have been compromised by contacting the IT department.
- ✔ Take their laptops home. If associates members do not have their laptops with them, they must collect them from the office as soon as possible. Setting up a VPN connection on a personal computer is strictly prohibited without authorisation from management or the IT department.
- ✔ Use the **LISAM TRANSFER** software to transfer data.
- ✔ Greet guests, clients, contractors and suppliers in person and do not leave them alone in the office. All visitors must sign the register at the entrance to any building assigned to the **Lisam Group**.





Personal data

In addition, associates are required to report any incident involving the disclosure of confidential information, such as a data breach. Reports can be sent to: data_breaches@lisam.com

Situation : I want to transfer information, including an associate's personal data, to a USB key so that I can work from home. What other steps should I take before transferring this data?

- Transferring associates or other company data to removable media such as USB keys is particularly risky and should not be done, even in exceptional circumstances.

Information security incident

Every member of associates is responsible for the security of personal and company information, as well as **Lisam Group's** assets. Failure to report security vulnerabilities or incidents and failure to comply with the reporting procedure, will result in disciplinary action. Furthermore, associates are required to report, via the appropriate means of communication, any security incidents such as:

- ✓ Loss of service, functionality, equipment or other facilities.
- ✓ System, software or hardware malfunctions, unplanned downtime, errors or unexpected system overloads.
- ✓ Human error and breaches of physical security measures.
- ✓ Non-compliance with the requirements of the safety management system and breaches of access.



Artificial intelligence

AI has enormous potential to improve our efficiency, automate tedious tasks and even extract valuable insights from vast amounts of data. However, it is important to recognise the potential dangers that can arise from irresponsible or unsafe use of this technology.

Firstly, AI can be prone to bias and error. This can lead to poor decisions with potentially (serious) consequences for the people involved.

Furthermore, in the context of our business, where we may be dealing with sensitive and confidential data, it is all the more important to take appropriate precautions when using AI. This includes the need to anonymise data before subjecting it to machine learning algorithms or other AI applications. By anonymising data, we reduce the risk of inadvertent disclosure of personal or confidential information, while maintaining the integrity and confidentiality of the data we process.

All associates are collectively responsible for ensuring that our use of AI is guided by ethical and privacy principles. This involves taking steps to minimise the risks associated with this technology, as well as committing to transparency and accountability in our data handling practices.

Situation : I want to optimise source code via ChatGPT. Is it okay?

- It is forbidden to send **Lisam Group's** source code to any artificial intelligence tool, as this could compromise the company's security and intellectual property. Sensitive data and proprietary algorithms could be exploited by malicious parties or competitors.



Respect of our relationship with parties

Client, competitor and fair and equitable choice of supplier

Associates at **Lisam Group** are committed to serving our clients with integrity, ensuring fair and honest dealings in every transaction. We uphold principles and values that emphasise the provision of services of the highest quality and greatest efficiency, in accordance with ISO 9001 certification standards.

This involves implementing a Quality Management System (QMS) designed to improve customer satisfaction, optimise internal processes and promote continuous improvement. Our aim is to gain a thorough understanding of our customers' needs and to continue innovating in order to meet and exceed their expectations.

- For further information, please refer to the document **Quality Policy** or send an email to the appropriate email address.

Lisam Group guarantees that all its service providers are treated fairly and equally during the selection of project bids. The selection process is based on impartiality through fair competition and objective assessment, focusing in particular on: financial equality, equal treatment, transparency of the process, the promotion of sustainable, balanced relationships and the prevention of corruption.

Consequently, all associates involved in the selection process must refrain from giving priority to their personal interests. This obligation to act in good faith during the pre-contractual phase is now required by law and regulatory standards.



United Nations
Global Compact

Culture of lawfulness

Regulatory compliance

Lisam Group complies with the laws, regulations and codes of conduct in each country in which it operates, as well as with this Code of Conduct (CoC) and the company's established policies, rules and procedures.

Fight against corruption

'**Corruption**' means the solicitation of a bribe by asking or inducing another person to give a bribe and escalates to extortion when accompanied by threats to personal integrity, life or the private actors involved (Principle 10 of the UN Global Compact).

Lisam Group strictly complies with anti-corruption laws in all countries in which it operates. We do not engage in, authorise or encourage corrupt practices.

- For further information, please refer to the **Anti-corruption policy** or send an email to the following address: **ESG@lisam.com**

Situation : I need to travel on business to a country that requires a visa. At the embassy, the officer tells me that the visa process is taking much longer than expected. He suggests that he can speed up the process if I pay him the sum of €1,000.

- We do not tolerate any form of corruption. Politely decline the offer, report the situation directly to your manager and send an email to **ESG@lisam.com**.





Combating illicit inducements and policy on hospitality

'Bribery' is the offer or receipt of a gift, loan, fee, reward or other advantage to or from a person as an inducement to engage in dishonest, illegal or breach of trust activity in the conduct of business (UN Global Compact Principle 10).

Lisam Group strictly prohibits bribery, illegal kickbacks, secret payments or any other form of improper remuneration. Associates, suppliers and partners are prohibited from offering, paying, soliciting or accepting bribes in any form.

However, associates may exchange modest gifts with customers or suppliers or make charitable contributions within reasonable limits. As a global company, **Lisam Group** complies with anti-bribery and corruption laws and regulations in all regions in which it operates.

Situation : I recommended a local "IT consultant" to help us. This consultant asked for a large retainer and said that the money would be used to "help speed things up". Since we don't know exactly where this money is going, is this arrangement allowed?

→ No, this type of payment is a disguised bribe and is not permitted.

A **'conflict of interest'** arises when an associate is personally engaged in a professional activity that could influence the way in which they perform their duties and, consequently, affect the impartiality and independence of their decision-making.

Employees of **Lisam Group** must avoid any situation that could give rise to actual or potential conflicts of interest by promoting transparent decision-making within the company in relation to third parties and customers.





Combating illicit inducements and policy on hospitality

Here are some of the most common situations that can give rise to a conflict of interest:

- ➔ **Conflict of interest or business-related conflict:** An associate must refrain from participating in any decision or exerting influence over business dealings with a competitor, customer, partner, vendor, supplier or any other commercial entity, whether current or potential, in which they have a direct or indirect financial interest.
- ➔ **Conflicts of interest relating to personal relationships:** An associate must refrain from participating in any decision or exerting influence over business dealings that might favour or appear to favour, a relative, a close friend or a company in which any of them has a direct or indirect financial interest.

Associates must not accept items intended to secure preferential treatment, maintain a commercial advantage or seek favouritism. Accepting or offering such gifts could be regarded as a bribe or an act of corruption.

To view the list of gifts that are accepted and may be given, please refer to our **[Gifts Policy](#)**. All gifts offered, received or declined must be recorded in a register. The gifts register will be updated annually and can be viewed via the following links: **[Gifts and Hospitality Register](#)**

Situation : I received an iPad as a gift from a supplier, and they had it personalised with my initials. Can I keep it?

- ➔ No. Politely return the item to the supplier and explain the company's policy.





Anti-money laundering and political contributions

Lisam Group complies with the relevant laws governing the prevention of money laundering and strictly prohibits any donations or contributions to political parties, candidates or organisations acting as intermediaries for political contributions on behalf of **Lisam Group**.

Associates are also prohibited from using the **Lisam Group**'s brand, resources, assets or equipment to engage in political activities, including demonstrations or election campaigns. Associates must also remain vigilant to avoid situations where their personal political contributions or activities might give the impression of a conflict of interest.

Situation : I am considering working with a supplier based in France who would like to receive payment into a bank account in the Cayman Islands. Can I work with this supplier?

- Bank accounts held in jurisdictions other than the one in which a supplier has its registered office raise red flags, particularly when the bank account is held in a jurisdiction known to be a tax haven.

At **Lisam Group**, associates involved in political activities are required to ensure that their participation is clearly identified as personal and not representative of the company. Associates must also comply with the requirements set out in local laws regarding political contributions in the countries where the company operates.

Situation : A leading political candidate has asked the company to make a substantial financial contribution to his campaign. Is it acceptable to make such a request?

- This is considered corruption. Engaging in bribery or any form of corruption is contrary to the company's values and policies, as well as to many local and international laws.



Our responsibilities

Board of directors

Lisam Group is responsible for approving the content and revisions of the Code of Conduct (CoC) and its associated documents, as well as for overseeing their distribution. In collaboration with senior management, **Lisam Group** ensures that the Code of Conduct (CoC) and its associated documents are effectively disseminated throughout the company and its subsidiaries.

Administration

Lisam Group associates are fully familiar with the Code of Conduct (CoC) and its associated documents, as well as their annual updates. If any aspect of the Code of Conduct (CoC) or related documents is perceived as unclear or difficult to apply, associates are encouraged to inform the CSR Committee at ESG@lisam.com.

CSR Committee

Lisam Group ensures that all departments adhere to the Code of Conduct (CoC) and its associated documents by facilitating their dissemination, promoting understanding and encouraging their consistent application through the CSR (Corporate Social Responsibility) committee. We provide guidance and support for handling reports relating to the Code of Conduct (CoC) and its associated documents and respond promptly to any queries or concerns regarding potential breaches.

Furthermore, we ensure the confidentiality and impartiality of investigations into reported incidents, facilitating discussions to determine appropriate corrective measures for acts or omissions that contravene the Code of Conduct (CoC) and its associated documents.





Associates

All **Lisam Group** associates are responsible for reporting any concerns relating to integrity, potential violations of the Code of Conduct (CoC) or company policies, and any instances of unethical, illegal or improper behaviour. These reports should be made to Human Resources, the direct manager and/or the CSR Committee.

In addition, associates are required to sign a letter of commitment, in accordance with the frequency specified by the company, confirming their commitment to adhere to the Code of Conduct (CoC) and its associated documents.

Internal audit

Lisam Group associates assesses compliance with the guidelines set out in the Code of Conduct (CoC) and its associated documents and promptly informs the CSR Committee of any breaches detected. The Committee closely monitors the measures taken by management to address the reported breaches.

Government and authorities

Lisam Group is committed to full compliance with the laws, regulations and relevant guidelines issued by the governments of all countries in which we operate. We maintain open communication and cooperation with the relevant authorities at all times. Associates will show respect to government agencies and officials, treat them courteously and foster an environment of openness and trust conducive to constructive discussions and agreements.

Associates are expected to respond promptly to and comply with all requests or observations from governments and authorities, and to cooperate effectively and courteously within the limits of laws and regulations. All interactions between **Lisam Group** and government agencies or officials will strictly comply with applicable laws and the principles outlined in this Code of Conduct (CoC) and its associated documents.



Reporting for stakeholders

Means of communication

The stakeholders of **Lisam Group** include:

- Associates
- Suppliers
- Shareholders
- Partners
- Clients
- Board of directors

If you find yourself in a situation where you perceive a conflict between the language of the policy and the laws, customs, or practices of your workplace, or if you have any questions about this Code of Conduct (CoC) or wish to report a possible breach of it, you are encouraged to raise your questions and concerns through established channels. These channels priorities confidentiality to the fullest extent possible:

- ➔ [Anonymous form for reporting an ethical issue](#)
- ➔ Enquête sur nos politiques et notre Code de Conduite (CoC)
- ➔ Code of Conduct (CoC) and policies survey
- ➔ [Incident report](#)
- ➔ ESG@lisam.com





Whistle-blower and non-retaliation protection

Retaliation refers to any adverse action taken against a member of staff for having reported, in good faith, suspected or proven misconduct, by any means possible, or for having cooperated with an investigation into such misconduct.

Examples of retaliation include dismissal, demotion, or denial of a promotion following the reporting of an incident of harassment or discrimination. Retaliation may also involve exclusion from important meetings, unjustified negative performance reviews, reduction in working hours or pay, or reassignment to a less desirable role.

Confidentiality cannot be guaranteed where **Lisam Group** is required by law to disclose an allegation of retaliation to an authority such as a government body, or where disclosure is necessary in order to investigate and/or resolve a complaint. **Lisam Group** may choose to publicly disclose the total number of alleged reports of retaliation received, substantiated and/or resolved.

Immunity in cases of reporting in good faith

Associates who reports, in good faith, an issue of alleged or proven misconduct, including retaliation, shall not face any adverse consequences for **Lisam Group** as a result of having reported the matter. This includes adverse employment measures, as well as any civil, criminal or administrative proceedings brought by the **Group**, regardless of whether the report is substantiated or not.

This protection does not apply where allegations of misconduct are made in bad faith or where it is established that an allegation was made with the malicious intent to harass or harm another associate. Nor does this provision mean that an associate will be protected against legitimate adverse employment measures that are not related to their complaint.

Approval

Sanctions or penalties

Failing to comply with this present Code of Conduct (CoC) may result in severe penalties for the individual and for **Lisam Group**, which may cause insecurity, financial loss and damage to its image or reputation.

A violation may result in :

- Disciplinary, civil and criminal sanctions against associate involved in such behaviour.
- Termination of a business relationship with a partner who does not accept or comply with this present Code of Conduct (CoC).

Revision

The practical application and effectiveness of this Code of Conduct (CoC) will be assessed annually following its adoption. In light of this assessment, this policy may be revised as necessary.



Michel Hemberg
CEO

Thierry Levintoff
CFO / CSR Committee chairman

Pauline Cinarelli
Certification officer / CSR
Committee Vice Chair

Océane Denis
Certification officer / CSR
Committee Vice Chair



Thank you!

