

EMPLOYING FRIENDS OR FAMILY MEMBERS

PROCEDURES AND POLICIES RELATING
TO THE BUSINESS CODE OF CONDUCT

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1 Context and purpose

This policy sets forth the key principles that govern the employment of friends or family members to limit the risk of conflicts of interest that are inherent to this situation.

These principles apply both to when the recruitment decision is being made and to the hierarchical relations between people with close ties to each other.

2 Scope of application

The key principles detailed hereinafter apply to all employees in the group, regardless of the nature of their contract, and to all workers involved through a service contract.

The following people are therefore concerned: company representatives, salaried employees, workers with the status of independent worker or sole trader, etc., and are hereinafter referred to as 'employees'.

3 Definitions

The terms '**close ties**' or '**friends or family members**' mean the following: the employee's spouse or partner; their relatives; their siblings; their children and their children's spouses or partners; their brothers-in-law and sisters-in-law; their parents-in-law; their nephews and nieces; their uncles and aunts; their grandparents; their grandchildren; or anyone else among the people close to them, including those to whom they are attached sentimentally and/or close friends.

4 Key principles

The Econocom group's employees can of course recommend employing people they are close to. However, to ensure respect of the principles of fairness and equal opportunities in employment and career development, the group has set forth key principles to be respected in regard to the employment of friends or family members. These principles encourage greater transparency and seek to limit real or potential conflicts of interest brought about by this situation.

The principles set forth below apply to the process of recruiting a person with close ties to an employee in the Econocom group but also to a situation in which two employees in the Econocom group are close to one another.

It is the Human Resources department's responsibility to implement measures ensuring that the principles below are respected.

Key principles:

- Recommendation of a friend or family member for a job vacancy should be made in writing and mention the existence of the close ties;
- Employees should refrain from intervening or attempting to intervene, directly or indirectly, in:

- the recruitment process,
- the decisions on pay or benefits,
- career management (transfers, postings, etc.),
- any other decision affecting the work of friends or family members.
- Employees should avoid becoming part of direct or indirect hierarchical relationships with friends or family members. If this situation arises, they should comply with procedure #105 Conflicts of interest and follow the measures taken to resolve this conflict of interest.

To respect the privacy of employees, this information shall be processed confidentially and shall only be shared with people who legitimately need to know it, unless provisions agreed on with the people concerned run counter to this.

- Particularities in recruiting a candidate, in particular a friend or family member:
 - the recruitment should reflect a real operational need,
 - the job vacancy advertisement should be published internally and/or externally, except for confidential or critical jobs,
 - the principles of fairness and impartiality should be respected throughout the recruitment process,
 - several candidates (unless there is a lack of candidates) should be welcomed for an interview with operational workers and the Human Resources department for the job vacancy in question,
 - the recruitment decision should be objective and should only be determined by the candidate's profile, skills and experience in light of the job position in question.

5 Co-optation bonus

For group Entities that allow it, employees who recommend a friend or family member can enjoy a co-optation bonus under certain conditions and depending on the entity's business policy. The rules to respect and the bonus amount are set by the senior management of the entity concerned.