# Citizenship numberly





Presentation of Numberly

Citizenship, our vision

Our Key Impacts

- Diversity and Equality
- Environmental Responsibility
- Social Initiatives and Knowledge Sharing
- Corporate Social Responsibility and Ethics

What they are saying about us

**Appendices** 



Presentation of Numberly

# Numberly, Marketing Technologist

#### Digital native & Data driven

Digital native, Media, CRM and data have been at the heart of our business for 20 years. We use a data-driven approach to impact engagement and sales, in order to turn your marketing spend into a profitable investment. Optimizing your ROI is our strategic and operational priority.

#### Solid & International

Numberly is a financially strong, publicly traded company based in Paris, with operations in 53 countries and a team of 33 nationalities.

#### Engaged & Responsible

The consistency of our commitments for over 20 years is a testament to our convictions.

We believe in parity as a factor of performance and success, and the recognition and loyalty of our clients is proof of this commitment.

#### Passionate & Collaborative

More than 500 employees united by a "marketing & tech mindset". A focus on data and quality of execution and a flexible and pragmatic approach.

We pass on our passion and know-how to our clients' teams, but also our commitment to the ecosystem to defend the Open Internet and European digital sovereignty.

#### Tool-Agnostic Tech Experts

Internationally recognized and tool-agnostic technological expertise: activation of our tools (CRM, Numberly trading desk, CDP) and expertise in third party tools.

#### Innovative & Award-Winning

**R&D** investment of up to 10% of our turnover to maximise your performance. The performance we bring to our customers is demonstrated by the numerous awards we have received for the systems we implement.



















Paris

Brussels

London

Amsterdam

Tel Aviv

New York

# Our products and services

We drive value and growth for our clients by transforming their digital marketing spend into efficient and profitable data-driven investments.

#### CRM & Data Services

- CRM Strategy & Lifecycles
- CRM Campaign Management
- Collection and engagement operations
- Loyalty programs

#### MarTech Platforms

- Automated Marketing
- Messaging
- Customer Data Platform

## Digital Media

- Media Strategies
- Display & Video Programming
- Social Media
- Retail Media

## Strategy & Insights

Consulting

Insights & Analytics

Numberly Academy

# Citizenship Our vision

# Making a positive and lasting impact through our work ...and beyond

Numberly is a company known for its pragmatic commitment to setting clear and realistic priorities for action, including facilitating the professional development of our teams and promoting corporate philanthropy.

We strive to have a positive impact on our teams, our clients and partners, and the entire MarTech ecosystem.

We are aware of the need for an ecological and social transition. Sustainability is an important concept for Numberly, which is why we have invested in economic issues, social initiatives, diversity and the environment since our inception.

Our actions are recognized by the Gaia Rating and WEConnect International. We have obtained a Silver rating for Corporate Social Responsibility from Ecovadis. We are a member of the United Nations Global Compact program for our respect of their 10 fundamental principles (see appendices).











#### Our commitments

#### Social

- Boosting parity and diversity in the Tech ecosystem
- Take action for social inclusion
- Contribute to community projects and participate in Tech for Good
- Transmit and share our knowledge
- Give preference to suppliers with a socially inclusive approach
- Guaranteeing all our employees an income above the living wage

#### **Environmental**

- Monitor and reduce our environmental footprint
- Choose suppliers with an environmentally responsible approach
- Raise awareness of climate change and resource scarcity

#### Societally

- Maintain independent, equal and transparent governance
- Maintain transparency in decision making
- Defend the Open Internet
- Support Open Source
- Choose suppliers who apply ethical principles



Our Key Impacts

Diversity and Equality

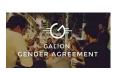
# Equality "by design"

Numberly's commitment to gender equality and diversity begins at the recruitment stage, with parity in hiring, compensation and promotion. This balance of men and women at all levels and in all professions contributes to strengthening Numberly's collective intelligence. The prospects for advancement and career opportunities are the same for both men and women. Numberly strongly encourages its employees to advance within the company's businesses, without differentiation by gender. Promotions are awarded to both men and women, women can remain in their positions during maternity leave, and maternity leave does not preclude the possibility of a salary increase.

As proof of this commitment, we have obtained an Index of 97/100 in 2022.

In line with this policy, Numberly has signed the Galion Gender Agreement (see appendices).

Since 2023, Numberly has been certified WEConnect International.





# 97/100

index of professional equality between women and men as of 2022

**50** %

perfect balance in all our governing bodies, management committees and board of directors

15

women invited to share their expertise and experiences in 2021 during webinars and talks

# Organization of awareness-raising events

Webinars Gender Equity on the occasion of International Women's Rights Day

Harassment awareness workshops with **The Women's Foundation** 

# Cultural and Geographic Diversity

Aware of the increasing internationalization of its activities, Numberly has chosen to embrace geographic diversity by including **33 different nationalities** in its teams. Numberly considers diversity to be an asset, offering a plurality of perspectives and experiences.





Our Key Impacts

**Environmental Responsibility** 

# Measuring our carbon footprint

Numberly is committed to developing the most complete and accurate carbon footprint possible, covering all of Numberly's activities and subsidiaries.

This work, carried out in collaboration with an independent expert (Mr. Séverin Fischer - One Earth Consulting), applying the official ADEME methodology - ABC Bilan Carbone® - and covering scopes 1, 2 and 3, resulted in a first version in September 2022.

Measuring the carbon footprint of the digital sector is still in its infancy and lacks standardization, particularly on an international scale. Nevertheless, we strive to be as precise and exhaustive as possible and we are following the work of the Boavizta and NegaOctet collectives with interest. Our sources are the GreenIT study, Ademe/Arcep and IEA.

This report will be updated every year to measure the evolution of our emissions and to prioritize our actions. Numberly is a signatory of the Climate Act, Paris Action Climat and SBTi charters.









### Carbon footprint

(in tons of CO2 equivalent)

Scope 1: 22.5 Scope 2: 66.8 Scope 3: 238

Total of these 3 scopes: 327.3

Real estate	88.19
Transportation	28.35
IT (excluding DC)	38.95
Consumables	74.76
DC Energy & Cloud	97.1

#### Zoom on Carbon Reduction and Net Zero contribution

Numberly aims to reduce its emissions by 28% by 2030 (scopes 1 & 2) by a 3 points plan, and is contributing to global Net Zero by 2023:



Replacement of our building's heating system for a less energy-consuming system (planned for 2023)
30% more efficient

- Building roof insulation (planned for 2025) 30% energy savings
- Replacement of gas boilers by CPCU in 2030, 16% reduction in direct emissions
- Reduction of travel / remote working and videoconferencing: 45% turnover of remote teams
- Awareness of eco-gestures:
  - 6% electricity savings by turning off the screens at night rather than leaving them on standby
  - 7% savings by lowering the heating from 20° to 19°



#### • Avoidance of scope 3 emissions for our clients:

Development of tools allowing our clients to reduce the carbon footprint of their campaigns:

- Campaign Sustain Score: allowing to know upstream and downstream the GHG emissions of an emailing and display campaign
- Email Expiration Date: Implementation of a date in the header of CRM emails to define the validity period of the message and facilitate their deletion in order not to store millions of useless messages on our servers
- Global Contribution programs: -328 mtCO2 / year

Carbon sequestration via our reforestation program in France (unaccounted): -150 mtCO2 / year

	2022	2030	2050
Scope 1	22.5	21	18
Scope 2	66.8	44	34
Scope 3	238	221	200
Contribution Net Zero 2023	-328		



# Reducing carbon footprint for our clients

Based on the results of our Carbon Assessment, the 3 priority axes for reducing our footprint are:

#### Optimize and reduce the number of emails sent and innovate

- Advise our clients and optimize targeting to reduce the number of emails sent
- Offer a "carbon" reporting to our clients so that they can measure the impact of their campaigns
- Optimize the weight of creations and lighten sendings

#### Analyze the lifecycle of our equipment

- Make all our equipment (employees and data centers) last as long as possible
- Minimize new purchases
- Ensure the end-of-life of our equipment by favouring reconditioning with an aim to reuse and if not feasible, at least ensure the quality of the recycling channels

#### Master the energy consumption of our data centers

 Optimize our calculation processes and algorithms (this allowed us to remove 18 processes and cut 37 servers in early 2022)



#### Awareness and innovation

#### Innovation to raise awareness

We are working on developing a **Campaign Sustain Score** within our reporting tool in an aim to integrate different sustainability criteria into the evaluation of the success of a campaign for our clients. This score will enable our clients to leverage various points to minimize the impact of their campaigns.

In addition, Numberly is participating in the implementation of an expiration date for emails and supports the collective initiative **Email Expiration Date** which seeks to reduce the impact of obsolete emails unnecessarily stored on servers. This feature **is deployed since december 2022** in the Numberly Martech Platform (NMP), a marketing automation product made available to our clients.

Numberly is participating in the **IAB Alliance Digitale** working group on the creation of a messaging footprint measurement framework (SMS - RCS).

#### Accessibility and eco-design training

All the UX/UI design teams within Numberly are trained in accessibility thanks to **Urbilog** and the development and project management teams will be trained in eco-design and AVC during 2023-2024, thanks to **GreenIT** certification training.









# Raising awareness of our teams and partners

#### Organisation of "Climate Fresk" workshops

Every month since September 2021, we have been organising "Climate Fresk" workshops to raise awareness about climate change.

This 3-hour workshop allows everyone to understand the functioning, scope and complexity of the issues related to climate change.

We are deploying the Climate Fresk with the objective of raising awareness among 100% of our teams by 2024, with 3 facilitators and 1 trainer on board.

#### Organisation of the "Digital Fresk" workshops

We are also deploying the "Digital Fresk" workshop since September 2022 with 1 integrated facilitator. This fun and collaborative 3.5 hour workshop aims to raise awareness and educate participants on the environmental challenges of digital technology as well as to explain the broad outlines of the actions to be taken to move towards a more sustainable digital environment. Version 2 of this workshop benefited from the expertise and contributions of EcoInfo CNRS.

#### Organisation of workshops on the Zero Waste approach

We occasionally call on the Zero Waste France association to present and explain the zero waste approach to our employees and thus work to reduce our waste. The provision of reusable bags for lunches is a concrete application of this.







# Reforestation, collection and recycling program

We observe our environmental impact every day, from the choices of our partners to our technical investment decisions, in order to reduce our carbon footprint to a minimum.

**The Joyeux Recycleurs** collect certain types of waste from the company such as cardboard, paper, plastic cups and bottles, cans, cartridges, batteries, lamps, pens, corks, cigarette butts, light bulbs. They then share the statistics of the waste and also pay 5 cents per kilo collected to **Ares atelier** (center for adaptation to active life).

**Reforest'Action** is a company that enables individuals and companies to take concrete action in favour of reforestation in France and around the world. We have committed ourselves to planting 11,153 trees in Mont-Saint-Père (02) to restore a forest after a disease, between 2018 and 2020, which will generate numerous benefits:

- Climate: capture potential of 1,500 tons of CO2
- **Biodiversity:** over 30,000 future shelters for animals
- Health: close to 40,000 months of oxygen in the future
- Employment: close to 10,000 hours of work created

From 2023 onwards, Numberly is committed to planting an additional 1000 trees each year.

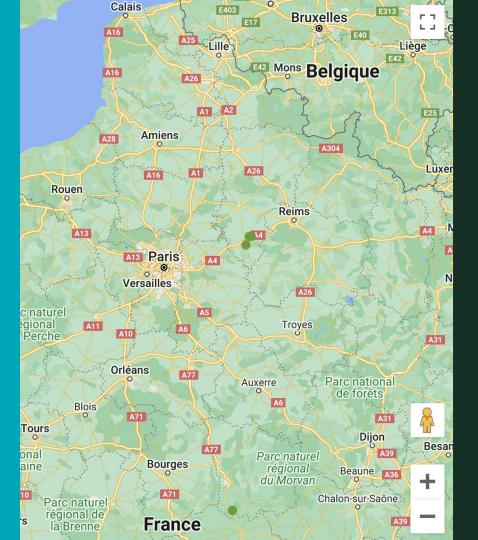
**Emmaüs Défi** provides **Amistock** containers on our premises to collect clothes and small household appliances. More than 6,000 liters are donated to the association per year.











# 10 000 tree(s)

planted by NUMBERLY in this forest



reforestaction.com/numberly

Benefits created by the trees already planted



1500 ton(s) of CO2 stored



30 000 shelter(s) for animals created



40 000 month(s) of oxygen generated



10 000 hour(s) of work created

# Employees intervention and mobilization

Numberly regularly organizes events and workshops dealing with environmental issues:

**Webinar** "Less is the new more": marketing at the test of sobriety

#### Talks

- Maud Sarda, co-founder and director of Label Emmaüs
- Les Autruches Utopistes: "De l'autre coté" project presentation
- Zero Waste France Zero Waste approach presentation

#### **Internal Challenges**

- Clean your mailbox
- Zero Waste Lunch
- Sports challenges in support of the Zero Waste association

#### Workshops

- Do it yourself: cosmetics household products nutrition
- Climate Fresk
- Digital Fresk
- Diversity Fresk
- New stories Fresk



Impact

Hours completed

Challenges completed

Organizations helped

7 +75%

Areas of action	Hours completed	Challenges completed		
Environment	164	147		
Social inclusion	19	76		
Education	10	3		
Gender equity	10	10		

Our key impacts

Social Initiatives and Knowledge Sharing

# Partnership with associations since 2004

Our partnerships with numerous associations are designed to improve social cohesion or to raise awareness of environmental issues:

- Sponsorship of 41 youths with Télémaque
- Mentoring of 6 SSE projects with high schools and universities in partnership with Latitudes
- 10 hours of classes given at Label École
- Mentoring with Tower Hamlets Education Business Partnership (THEBP) for the benefit of local children (London)
- Support of beekeepers via the association Un toit pour les abeilles
- Participation in the popularization of the "Giving Tuesday" movement in France
- Participation in training workshops at the Melun prison with CodePhenix
- Organization of Talks with various associations and notably Zero Waste France
- Regular organization of workshops to raise awareness of climate change with the Climate Fresk (once a month) and the Digital Fresk

During the **EuroPython** conference, Numberly was able to promote non-profit organizations we work with such as: CodePhenix and Latitudes.

















# Skills sponsorship

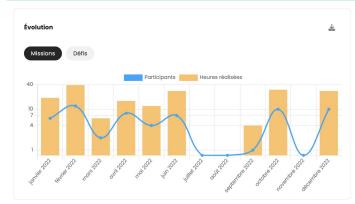
Numberly is involved with associations, particularly through skills sponsorship.

These missions allow employees to make a commitment by making their expertise available to an association during their working hours. These actions have been simplified since 2021 thanks to the introduction of our Wenabi employee Volunteering platform.

The following sponsorships were carried out:

- A free media campaign for Entrepreneurs du Monde
- A study for the Restos du Coeur via Latitudes
- Development of a contact tracing application in the context of Covid, through a European hackathon organised in collaboration with Latitudes
- Conducting a study for La Fondation des Femmes
- Conducting a study for Imagine for Margo in the UK
- The co-creation and financing of the website "De l'autre côté" for the **Autruches Utopiste** with **CodePhenix**







# Sharing knowledge

#### Transmission, Training, Role Model

- 150 hours of teaching in higher education in 2022
- 66 hours of courses teach in associations through skills sponsorship in 2022
- Organization of visits and sharing with young people from "Télémaque" and "Les Apprentis d'Auteuil" every year
- Role model: Yseulys Costes (CEO and co-founder of the group) in podcasts, videos and during training sessions
- FNEGE Pedagogical Innovation Award in 2021





150 hours of teaching in higher education

hours of courses teach through skills sponsorship

Our key impacts

Corporate social responsibility and ethics

#### Governance

The Board of Directors is committed to good governance practices, in particular by complying with the recommendations of the AFEP-MEDEF Corporate Governance Code.

- **Independence o**f corporate bodies ensured by a Board of Directors that includes 50% independent directors (article 8)
- Board of directors composed of **50% of women** (article 6.3)
- Creation in 2010 of a compensation committee (article 16)

Numberly is a member of the **Pacte PME**, which promotes interaction between SMEs and large companies. Yseulys Costes (CEO of the group) was elected to the board of directors in 2022.

Since its inception, Numberly has undertaken to closely associate employees with the company's capital.



# Transparency and data privacy

Numberly wishes to be transparent with its ecosystem and therefore makes all key information available on its website. The website contains notices of meetings, the results of the General Assembly vote, the end of each year's financial year and the half-yearly results of the liquidity contract.

Numberly chooses its suppliers on the basis of their acceptance of a code of conduct (see Appendix: Code de Conduite Fournisseurs). This implies compliance with current labour legislation and the fight against child labour, all forms of discrimination and corruption.

Numberly makes very clear commitments regarding data security, integrity and data confidentiality: the group undertakes to use clients' personal data only for the purposes of its missions and only for the purposes for which the data was communicated.



The SNCD Pacte de Protection de la Vie Privée label confirms Numberly's quality of respect for personal data security.



We are a member of the EDAA, which ensures the privacy of European Internet users with regard to targeted advertising.



We are a member of the YOC platform, which allows EU users to control the collection of their data and exercise their choices about targeted advertising.



We are a member of the DAA, which ensures the privacy of US Internet users with respect to targeted advertising.



We are members of the NAI, which promotes the privacy of Internet users targeted by advertising in the United States and gives Internet users the opportunity to exercise their choices via an opt-out platform.



We are a member of TCF which helps advertising and digital marketing companies comply with their obligations under the GDPR and ePrivacy directive.



We are published members of the DMA, which provides a collaborative and informative environment for specialist data and marketing activity in the UK.

#### Influence in our environment

The company is keen to encourage young entrepreneurs to start up, to advise them in their approach and in this way to enable the French entrepreneurial fabric to develop more and more. To do this, we participate every year in digital events, in France and abroad.



Numberly was founded with the development of digital technology and the company quickly became aware of the power and potential of data. From the outset, Numberly has encouraged the **ethical use of data in a way that respects Internet users**.



Numberly's CEO, Yseulys Costes, was awarded the Medal of Merit in recognition of the **spirit of enterprise and innovation** that enables France to shine internationally in the digital world.

# 2019

Yseulys Costes is ranked 12th in the Forbes ranking of 40 French women.

Numberly is also active in developing the talents of tomorrow through partnerships with Dauphine, ESSEC, Centrale Paris and the CMLA of ENS Cachan.



#### Academic research

#### Numberly also actively contributes to academic research:

- Contribution to 15 theses (CIFRE and collaboration), including:
  - Optimisation d'ordre zéro en Real Time Bidding" (2022)
  - "L'influence de la stratégie omni-canal des marques" (2020)
  - "Application des processus stochastiques aux enchères en temps réel" (2017)
- 30 publications in scientific journals and research conferences, including:
  - Efficient Algorithms for Stochastic Repeated Second-price Auctions (2021)
  - Algorithmic Learning Theory , Paris (2021)
  - The Marginal Impact of an Additional Brand-Initiated Communication Channel: a People-Based and Incremental Approach (2019)
  - European Marketing Academy Conference, Hamburg
- Contributions to the publication of white papers:
  - Center for Customer Management
  - Baromètre de l'innovation commerciale SCOPS (Master 206 Paris Dauphine)



# Advocacy and promotion of the Open Internet

#### The facts

#### The internet is divided into 2 zones:

- The GAFA's Internet, creators of soft laws and standards for the entire Internet, "logging companies" with simple uses but which, under the guise of protecting their privacy, eliminate all innovation and therefore ultimately penalize Internet users by eliminating the Open Internet.
- The Open Internet, a "free zone": a zone of possible innovation, experimentation and data processing, the only zone in which Europe could really express itself and find its place, while developing free competition and innovation.

#### The challenges

- Economic independence of our companies against GAFA
- **Employments** to be protected against the arbitrary actions of the GAFA, to be created by developing the Open Internet
- Political sovereignty: we won't have a political weight if we don't weigh in the digital economy or in the digital soft law
- Protection of our political project: diversity, political plurality, gender equity, fight against discrimination. In the digital space, this project is concretely inscribed in coding, algorithms and standards

#### The project

Bring the economic civil society into the latent balance of power.

To elaborate free, positive and powerful convictions in our ecosystem on the public scene in order to get out of the fatalistic, anaesthetized and lenient comments on the digital.

Raise the alarm so that business leaders measure their digital dependence on GAFA.

Raise awareness among political leaders and accelerate the training of elites. Push the issues of digital independence and sovereignty to the media, academic and intellectual agenda.

In fine, facilitate concrete regulatory battles thanks to a better understanding of the issues.



#### Open Source contribution



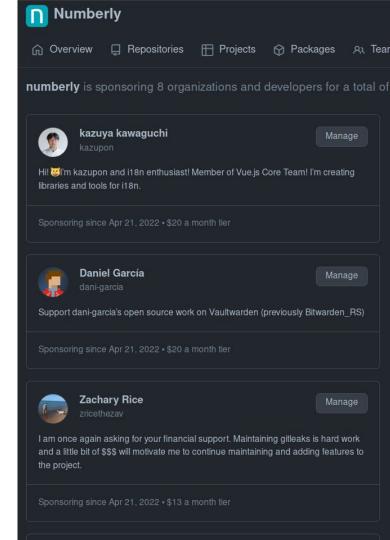
#### Why?

- Numberly relies heavily on Open Source softwares
- Numberly has been an open source contributor since its inception
- Numberly has released several of its projects as Open Source
- Numberly contributes to various third party open source projects

#### How?

Numberly has allocated an annual funding budget on GitHub and already has 8 projects supported and active:

- Kazupon: VueJS multilang frontend support
- Drakkan: SFTP software
- Dani-garcia: bitwarden
- Samuel Colvin: backend data validation library
- Zricethezav: security and passwords leaks on Gitlab scanner
- Ricoberger: synchronization magic of SSL certificates in Kubernetes
- Encode: Python API frameworks
- Axios: Frontend web queries



# **Employees Support**

Talents working at Numberly are supported throughout their careers:

- Training to develop and diversify skills and careers
- Performance evaluation and rewards through follow-up for each employee
- Valuing and encouraging diversity, which is made possible by the company's geographic location to develop an international career

Soft skills training available on request:

- Public speaking
- Management peer-coaching workshop
- "How to give feedback to a peer" workshop

Since its inception, Numberly has continually sought to maintain an environment that encourages free speech. The development of a flat hierarchy encourages initiative and freedom of opinion.



2756 hours of internal training in 2022

hours external training in 2022

# Working environment

**Flexibility** of the working rhythm adapted to employees: the hybrid working framework proposed, with 120 possible days of teleworking per year, at the employee's choice, and up to 60 cumulative working days.

**Internal mobility**: during the annual job review, employees are invited to express their desire for geographic mobility and/or job mobility (within the group).

**Employees' wellbeing**: access to yoga, sports, culture and discounts.

Access to awareness workshops, talks and webinars. Possibility for teams to bring their pets (dogs) to work. Numberly has also adopted two cats from a charity and is experimenting with vermicomposting to help employees recycle their food waste.

**Offices** in the 9th arrondissement of Paris, with their Haussmann-style architecture and original layout, allow us to maintain a pleasant, small office environment with no open space or private offices.

Internationally, the link between the different offices is fundamental: time slots adapted to the time zone are dedicated to exchanges and travel between the different countries is facilitated.

Each workspace has a fully equipped kitchen and is supplied with free drinks (milk, tea, coffee).



# Health and Safety

To ensure the health and safety of our employees, Numberly has many preventive measures in place:

- We make sure that each employee has a health check-up, systematically when they join the group, then repeated every 2 years
- Each employee is assigned a referent from another team, without any hierarchical link, to allow optimal freedom of speech on all subjects
- Personal development support is available to employees requesting it
- Noise exposure is reduced by installing "sound traps" in the premises
- A team of people with knowledge of first-aid is in place and regularly trained (training includes fire extinguishing and fire prevention)
- Numberly seeks to improve the daily lives of its employees with musculoskeletal disorders and provides adapted equipment: dual screen, high reactivity of 24 hours on the change of office equipment (headset, mouse, keyboard, office chair) on request



What they say about us

# What they say about us

#### Télémaque

An association that works for equal opportunity in education by supporting young people from modest backgrounds from middle school onwards by organizing sponsorships. Numberly has sponsored over 40 young people since 2015.

"Numberly has been a partner of Télémaque since 2015. Beyond the young people supported by the company and mentored by Numberly employees, it's an incredible opportunity for our young people who were able to discover innovative digital jobs or participate in collaborative workshops with the passionate teams of this inspiring company! Thank you to Yseulys Costes and her teams for their loyalty and active participation in our national movement for equal opportunity!"

#### Ericka Cogne (General Manager)

#### CodePhenix

A social economy company whose objective is to train prisoners in programming to enable them to reintegrate into society and fight against recidivism. Numberly intervenes by offering interventions and missions.

"Numberly has been working with CodePhenix since 2019, from our first promotion in a detention center.

By allowing their employees to come and intervene with us in the prison environment with our learners, and by collaborating with our web agency in detention, they have been a particularly important support in the development of CodePhenix.

In addition, our collaborations allow us to make more people aware of the problems of prison leavers, a subject that is very little known by the general public."

#### **Brieuc Le Bars (Founder)**



## What they say about us

### Latitudes

A pioneering "Tech for good" community with over 3,000 members, including companies, associations and students from the Grandes Ecoles (France's higher education system). Numberly has been a partner since its inception and participates in mentoring and skills sponsorship.

"Numberly was the first digital company to support Latitudes in 2018. Since then, we have been growing together in our thinking to make digital a force for solving social and environmental challenges.

Over the past 3 years, we have notably been able to set up:

- + a data analysis skills sponsorship mission with the Restos du Cœur (French charity offering meals),
- + mentoring actions with engineering students to help them discover commitment,
- + interventions within Numberly's teams to raise awareness of the social and environmental challenges of digital technology.

Of course, much remains to be done collectively, and we look forward to continuing the journey with Numberly as they work in an area where digital accountability needs to advance and is essential.

We especially appreciate the sincere questioning of Numberly's teams about their impact."

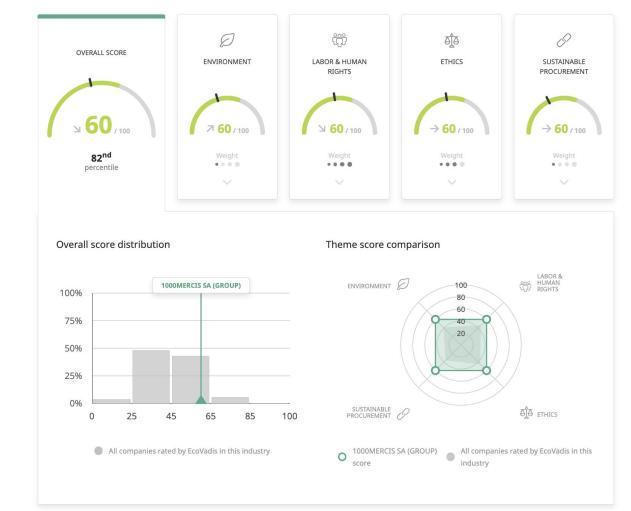
Augustin Courtier (Co-founder)



Appendices

# Labels





### Labels



**WEConnect International** is a global network connecting women-owned businesses with qualified purchasing teams around the world.

Numberly is certified WEConnect International and aligned with its vision of helping women entrepreneurs succeed in different markets.

The 4 criteria considered for WBE certification by WEConnect International are ownership, management, control and independence. Companies meeting these 4 criteria must be at least 51% managed by one or more women.



**The Galion Project** provides Tech entrepreneurs with the <u>Gender Agreement</u>, a tool helping to establish a better gender balance in the teams.

With this convention, The Galion Project offers 45 simple and concrete solutions that have been defined with Galion's members to promote gender equity in companies.



### Labels



Our CSR policy abides by the UN Global Compact established guidelines and revolves around 4 universal principles:

- Human rights
- International labor standards
- Environment
- Fight against corruption



Numberly is a leader in digital business innovation. As a socially and environmentally responsible company, Numberly is the guarantor of the values we stand for and must ensure that these values are upheld in every innovation.



Since its inception, Numberly has been recognized for its commitment to Social, Environmental and Economic Responsibility. Our actions are recognized by the Gaia Rating and we have achieved a Silver rating in the Ecovadis Corporate Social Responsibility rating.



## **Data center Certifications**



Numberly has its own server secured in two data centers located in France.



This technological edge allows the group to ensure a complete transparency of the data cycle.



Our data center partners are certified:



HDA



ISO 22301



ISO 50001



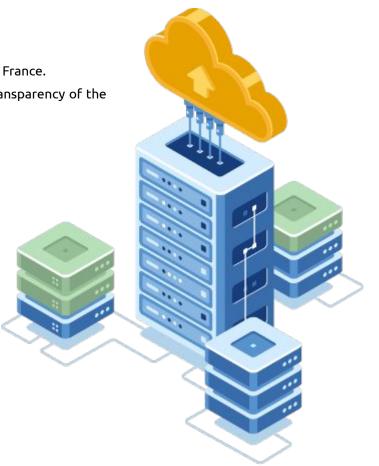
- OHSAS 18001
- PCI DSS
- SOC 1 Type II













# The 10 principles of the United Nations Global Compact

#### Global Compact

Announced by United Nations Secretary-General Kofi Annan during the World Economic Forum of January 1999 in Davos, Switzerland, and officially launched at UN Headquarters in July 2000, the Global Compact calls on companies to adopt ten universal principles on human rights, labor standards, the environment and anti-corruption in the spirit of responsible and sustainable development.

The Global Compact's principles on human rights, labor standards and the environment are the subject of universal consensus and are inspired by the following instruments:

- The Universal Declaration of Human Rights;
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work;
- The Rio Declaration on Environment and Development.

The Global Compact calls on companies to embrace, support and enact a set of core values in the areas of human rights, labor standards, the environment and anti corruption within their sphere of influence. The ten principles are as follows:

### **Human rights**

**Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and

**Principle 2:** make sure that they are not complicit in human rights abuses.

#### Labor Standards

**Principle 3**: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

**Principle 5:** the effective abolition of child labour; and

**Principle 6:** the elimination of discrimination in respect of employment and occupation.

#### Environment

**Principle 7**: Businesses should support a precautionary approach to environmental challenges;

**Principle 8**: undertake initiatives to promote greater environmental responsibility; and

**Principle 9**: encourage the development and diffusion of environmentally friendly technologies.

### Anti-Corruption

**Principle 10**: Businesses should work against corruption in all its forms, including extortion and bribery.

To know more: www.unglobalcompact.org

## Supplier Code of Conduct - Part 1

Where national, other applicable laws and this present Code of Conduct cover the same subject matter, the more stringent provision shall apply. In addition, where this Code of Conduct conflicts with applicable laws, the applicable law shall apply. We are committed to working with suppliers who agree to comply with the requirements of this Code of Conduct which also respects the principles set forth in the International Labor Organization Conventions, the Universal Declaration of Human Rights, the OECD Guidelines and the Global Compact principles. Any breach of conduct or violation of this Code of Conduct by our suppliers or their subcontractors will result in the review and possible termination of the business relationship.

#### SOCIAL REQUIREMENTS AND RESPONSIBILITIES

**Forced Labor**: The use of forced labor by our suppliers, whether obtained through the threat of sanctions, withholding identity papers, any security deposit from workers or any other coercion, is strictly prohibited.

**Child Labor**: The employment of children under the age of 15 is strictly prohibited. In countries where local law provides for a higher working age or extends compulsory schooling beyond 15, the higher age will apply.

**Harassment and Abuse:** Respect and dignity are principles to which the Company is committed. We therefore do not tolerate any form of physical punishment, moral or physical harassment or any other abuse.

**Discrimination:** We expect our suppliers to treat all employees equally and fairly. Our suppliers shall not discriminate in hiring, training, promotion or termination on the basis of gender, race, religion, age, disability, sexual orientation, political opinion, nationality, social or ethnic origin.

**Wages and Benefits:** Our suppliers shall, as a minimum, pay a regular wage and overtime at the legal rate imposed by the country of origin of manufacture and provide the workers with the legal benefits in force. In the event that the country of origin does not have a legal minimum wage and overtime rate, the supplier shall ensure that the wage is at least equal to the minimum average for the industry sector concerned and that overtime is at least equal to the usual hourly rate of pay. No deductions in wages shall be made for disciplinary reasons.

**Hours:** Our suppliers shall comply with the limits imposed by the laws of the country of manufacture with respect to hours of work and overtime. Our suppliers shall not impose excessive overtime. The total number of working hours per week shall not exceed 60 hours, including all overtime hours, and at least one day of rest per seven-day period or, in either case, the maximum set by the laws of the country.

**Freedom of Association:** We expect our suppliers to respect and recognize the right of every employee to bargain collectively and to form or participate in a labor organization of their choice without penalty, discrimination or harassment.

**Health and Safety:** Our suppliers will provide a safe and healthy work environment to prevent accidents or injuries that may be caused by, associated with, or occur during the course of work or while handling equipment. They will implement systems to detect, prevent or neutralize any threat to the health and safety of personnel and will comply with applicable local and international laws and regulations. The same principles will apply to providers of accommodation.

## Supplier Code of Conduct - Part 2

### **ENVIRONMENTAL REQUIREMENTS AND RESPONSIBILITIES**

We expect our suppliers to share our commitment to a clean and safe environment. We encourage initiatives enabling to reduce our impacts in particular through the use of environmentally friendly technologies.

Our suppliers will commit to comply with local and international environmental regulations and standards. Our suppliers shall be able to demonstrate the effective application of the following criteria:

- There is an environmental management system in place, possibly ISO 14001 or EMAS certified.
- Waste and emissions to air and water are adequately treated, with particular attention to hazardous waste and emissions that must not be abandoned, released or dumped illegally.
- People whose activities have a direct impact on the environment are trained, are competent and have the necessary means to accomplish their mission.
- There is an action plan for the management of waste and hazardous substances.

#### WAYS OF WORKING

**Legal requirements**: The Company expects its suppliers to comply with the law. Our suppliers must comply with national, local and international laws and regulations that govern their activities.

**Customs and Security Authorities:** Our suppliers will comply with all applicable customs laws, including those concerning the importation and prohibition of transshipment of goods in the country of importation.

**Subcontractors:** Our suppliers must obtain approval from Numberly before subcontracting any part of the manufacturing process. As a condition of our approval, subcontractors must agree to this Code of Conduct and all other applicable requirements.

**Anti-Corruption:** Numberly condemns all forms of corruption, extorsion, bribery, etc. and expects the same commitment from its suppliers.

#### MONITORING AND AUDITING

**Verification:** We reserve the right to monitor compliance with these principles and to conduct compliance audits at any time without prior notice. Our suppliers will provide necessary information and access to Numberly representatives who seek to verify compliance with the requirements of this code. They will be required to commit to improving and correcting any deficiencies found.

**Availability of Information:** The supplier shall maintain sufficient records to demonstrate compliance with this code of conduct. Our suppliers shall make available to our representatives complete, authentic and accurate records.



# Board of Directors bylaws - Part 1

#### **PREAMBLE**

In accordance with the principles of good governance, the Board of Directors bylaws, as adopted by the Board of Directors at its October 1st, 2010 meeting, sets out the duties and obligations of each director.

#### ARTICLE 1 – SOCIAL INTEREST

Each Director represents all the shareholders and must act in all circumstances in the interests of the shareholders and the Company.

They shall alert the Board of Directors to any factor of which they are aware that may affect the Company's interests.

#### ARTICLE 2 – ACCORDANCE WITH LAWS AND BYLAWS

Unless otherwise required by law or regulation, the director must be a shareholder in their own right and hold at least the number of shares in the company required by the bylaws. If they don't hold such shares at the time of taking office they must acquire said shares within three months. If at the end of the period the director has not acquired the required number of shares, they are deemed to have resigned automatically. Before accepting their appointment the director must take full cognizance of their rights and obligations and must ensure that they are aware of their general and specific duties. In particular they must be familiar with the legal and regulatory requirements, the company bylaws, the internal rules of the Board of Directors, the present bylaws and any supplements that the Board of Directors may provide. If a director is a member of a committee they must also familiarize themselves with the internal operating procedures of that committee.

#### **ARTICLE 3 - INDEPENDENCE - CONFLICT OF INTEREST**

Directors shall ensure that they remain independent in all circumstances, in terms of analysis, judgment, decision and action. They shall refrain from being influenced by any element external to the corporate interest that he is charged with defending.

The director undertakes not to seek or accept personal benefits that could be considered as compromising their independence from the company or from other companies and entities directly or indirectly related to the company.

The director is required to inform the Board of Directors of any direct or indirect conflict of interest, or even potential conflict of interest, with the company. In such situation they shall abstain from taking part in the vote on any deliberation of the Board of Directors as well as in the discussion preceding the vote. The Chairman may ask them not to attend the deliberations. This rule shall not apply if all the directors abstain from participating in the vote in application of this rule.

Directors are required to inform the Board of Directors without any delay of any links that may exist between themselves or companies in which they have a direct interest and the company. They must in particular inform the Board of Directors of any proposed agreement to which article L. 225-38 of the French Commercial Code applies prior to its conclusion. The Chairman of the Board of Directors must also be informed of agreements relating to current operations and concluded under normal conditions.

#### **ARTICLE 4 - LOYALTY DUTY**

The director is bound by a duty of loyalty towards the Company.

They shall not take any initiative that could be detrimental to the interests of the Company or of other companies or entities of the Group and shall act in good faith in all circumstances.

They may not take on personal responsibilities in companies or businesses that compete with those of the Company and its subsidiaries without first informing the Chairman of the Board of Directors and the Chairman of the Nominating and Compensation Committee.

### ARTICLE 5 – EXPRESSION DUTY

Directors have a duty to express their questions and opinions clearly.

# Board of Directors bylaws - Part 2

## ARTICLE 6 - PARTICIPATION IN THE BOARD OF DIRECTORS ACTIVITIES - ATTENDANCE

A director must devote the necessary time and attention to the preparation of Board Meetings as well as the meetings of the committees of which they are a member.

They must be assiduous and unless impossible must participate in all the Board meetings, meetings of any other committees they might be a member of as well as the shareholders' meetings.

A director learns about the company's businesses and specificities, its challenges and value. They must ask the Chairman of the Board of Directors for the information needed for a relevant intervention on the subjects on the Board's agenda. They shall endeavor to update the knowledge useful to them in the performance of their duties. If deemed necessary, they may ask upon appointment or throughout their term of office to receive additional training on the specific characteristics of the company, its businesses and its sector of activity. Such training is organized, offered and paid for by the company.

When they hold executive positions they must not, in principle, accept to hold more than four other directorships in listed companies, including foreign companies outside the Group.

#### ARTICLE 7 - CONFIDENTIALITY

Directors are bound by a genuine professional secrecy obligation, which goes beyond the simple obligation of discretion provided for by law, with regard to information gathered during or outside Board meetings under the conditions set out in article 11 of the Board of Directors' internal rules.

#### **ARTICLE 8 - PRIVILEGED INFORMATION - SECURITIES TRANSACTIONS**

Directors shall refrain from using privileged information to which they have access for their own personal profit or for the profit of anyone else. In particular, when in possession of information that has not been made public, they shall refrain from using it to carry out transactions in the Company's securities or have them carried out by a third party. They must only carry out transactions in the Company's securities in compliance with the legal and regulatory provisions. Directors undertake to strictly observe and comply with the provisions of the guide to preventing insider trading, the text of which is appended to the internal rules of the Board of Directors.

#### ARTICLE 9 - CONTRIBUTION TO GOOD GOVERNANCE

The director contributes to the collegiality and efficiency of the work of the Board of Directors and the specialized committees. They shall make any recommendation they consider likely to improve the way the Board of Directors operates, in particular during its periodic evaluation. They accept the evaluation of their own action within the Board of Directors.

Together with the other members of the Board of Directors, they are committed to ensuring that the control tasks are carried out efficiently and without hindrance. In particular, they shall ensure that procedures are in place within the Company to monitor compliance with laws and regulations, both in letter and in spirit.

# ARTICLE 10 - NON-ACCUMULATION OF A CORPORATE OFFICE WITH AN EMPLOYMENT CONTRACT

The executive who becomes a corporate officer of the Company undertakes to terminate the employment contract binding them to the Company, either by contractual termination or by resignation.



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