Ipsos:
OUR CODE OF CONDUCT

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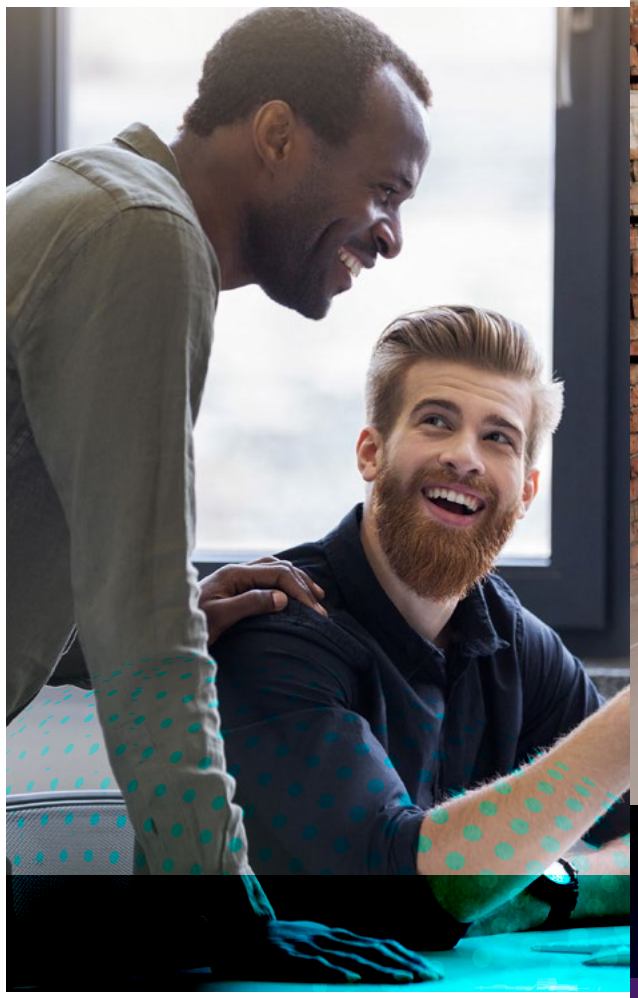


1 OUR VALUES

INTRODUCTION

The Code of Conduct summarizes our obligations and is not intended to be an exhaustive guide to all our legal, ethical, social, environmental and societal responsibilities.

The Code of Conduct should be read in conjunction with other relevant documents delivered to you or accessible on the Ipsos Intranet, namely:

The "Book of Policies and Procedures,"

which supplements the information set forth in this Code of Conduct and which all employees and managers must respect.

This Code of Conduct applies to everyone associated with Ipsos – that means full-time and part-time employees, consultants, and contractors.

We also expect our suppliers, who are bound by the same duty of care as Ipsos, to comply with our policies to the extent they are applicable, especially in the areas of human rights and environmental protection.

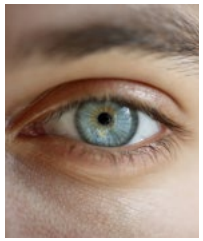
Violation of this Code of Conduct or of Ipsos' policies and procedures by Ipsos employees may result in disciplinary action, up to and including termination of employment. A violation by a contractor, consultant or supplier may result in termination of their contract with Ipsos. Misconduct that could result in disciplinary action includes:

- **Violating or circumventing, or inducing others to violate or circumvent, Ipsos' policies and procedures;**
- **Failure to promptly raise a known or suspected violation of relevant laws and regulations, or a significant breach of Ipsos policies. This can be done using the Whistle Blowing system or sending an e-mail to the Global Quality and Audit Director within 24 hours for any significant matter that could adversely impact Ipsos (see Section 5 (Fraud Prevention and Raising Concerns) for more details);**
- **Failure to cooperate with an Ipsos internal investigation; or**
- **Retaliation against another employee for reporting a concern relating to integrity.**

1 OUR VALUES

Being 'Proud to be Ipsos' means embracing who we are and looking for excellence together.

At Ipsos we encourage our leaders to lead by example.

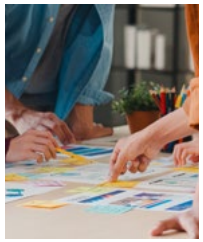


INTEGRITY

We demonstrate the highest ethical standards and principles. We are independent. cojective experts delivering reliable information to our clients.

CURIOSITY

We are curious about the world around us. We ask the right questions, we seek the new and unexpected.



COLLABORATION

Together, we are smarter than any one of us individually. We work in diverse teams combining clients and colleagues. Together we navigate the world towards common goals and open minds.

CLIENT FIRST

We put our clients first. Always. We focus on long-term partnerships and we understand our clients' businesses as if they were our own. We are responsible and accountable for providing our clients with the best solutions across our specialisations.

ENTREPRENEURIAL SPIRIT

We are different. Our culture encourages individuals to try different, innovative ideas. We are motivated. We work hard and smart, and we act quickly and decisively.

OUR POLICIES

2

2 OUR POLICIES

2.1 UNITED NATIONS GLOBAL COMPACT

Ipsos is a party to the UN Global Compact, meaning that we have undertaken to embrace, support and enact, within our sphere of influence, a set of core values in the areas of human rights, labour standards, the environment and anti-corruption. Specifically, this means that we adhere to the following 10 principles:

We support and respect the protection of internationally proclaimed human rights

We ensure that we are not complicit in human rights abuses

We uphold the freedom of association and the effective recognition of the right to collective bargaining

We support the elimination of all forms of forced and compulsory labour, including any form of modern slavery

We support the effective abolition of child labour

We support the elimination of discrimination in respect of employment and occupation

We take a precautionary approach to environmental challenges

We undertake initiatives to promote greater environmental responsibility

We encourage the development and diffusion of environmentally friendly technologies

We work against corruption in all its forms, including extortion and bribery

For more information on the UN Global Compact, see the website: www.unglobalcompact.org.

2.2 INTERNATIONAL LABOUR ORGANIZATION (ILO) FUNDAMENTAL PRINCIPLES AND RIGHTS AT WORK

Ipsos abides by the International Labour Organization's (ILO) Fundamental Principles and Rights at Work, specifically:

- **Freedom of association and the effective recognition of the right to collective bargaining;**
- **The elimination of all forms of forced or compulsory labour;**
- **The effective abolition of child labour;**
- **The elimination of discrimination in respect of employment and occupation; and**
- **A safe and healthy working environment.**

2.3 IPSOS' CLIMATE COMMITMENT

"Ipsos is committed to ambitious climate action."

We have joined the Science-Based Targets Initiative (SBTI) and committed to Net Zero carbon emissions by 2050 at the latest. This means we have aligned our decarbonisation plans with the Paris Climate Agreement's objective of limiting the rise in global temperatures to well below 2°C by 2050 compared with pre-industrial times.

2.4 EQUAL OPPORTUNITIES POLICY

"We aim to provide a healthy and ethical work environment for all our employees. We are committed to equal treatment of all employees and employment applicants."

We expect all Ipsos employees to treat one another professionally and with mutual respect, and the same should apply when interacting with clients, contractors, the general public and the media.

We do not tolerate discrimination by treating any individual less favourably than others on grounds of gender, gender identity, colour, race, religion, age, sexual orientation, marital status, ethnic or national origin, disability, or membership or non-membership of a trade union or other association. Additionally, we do not tolerate harassment of any kind, including sexual harassment, or other offensive behaviour and actions (this includes any behaviour or action that may interfere with an employee's performance and/or create a hostile, intimidating or offensive work environment).

As part of Ipsos' commitment to equal opportunities, we are a member of the Tent Partnership for Refugees and the United Nations' High Commissioner for Refugees' #WithRefugees coalition. Through these initiatives, companies like Ipsos support refugees' integration into their host countries through employment and economic activity by offering them jobs, mentoring and training.

2.5 PROMOTING WOMEN'S EMPOWERMENT AND GENDER EQUALITY

Ipsos is a member of the United Nations' Women Empowerment Principles (WEPs) and of the Unstereotype Alliance.

Ipsos actively promotes gender equality and the promotion of more women to leadership positions.

2.6 HEALTH AND SAFETY POLICY

We prioritize the maintenance of safe working environments and arrangements that facilitate the welfare of employees while at work. All employees are expected to responsibly take care of their own health and safety and the health and safety of others who could be impacted by their workplace conduct.

2.7 ONBOARDING SUPPLIERS: THE IPSOS SUPPLIER CODE OF CONDUCT

Ipsos expects its suppliers to abide by the same demanding standards it applies to its own activities and operations.

Ipsos applies fair treatment to its suppliers and aims to ensure all relevant suppliers, whatever their size, have equal opportunities to work with us.

These requirements from, and commitments towards, our suppliers are listed in the Ipsos Supplier Code of Conduct in ***Section 1.8*** of the Book of Policies and Procedures.

2.8 DRUG-FREE WORK PLACE

The use or possession of illegal drugs or unauthorized alcohol while at work, on Ipsos property or a client's facility is strictly prohibited.

Employees must not, either directly or indirectly, including through the Ipsos entity for which they work, offer, promise to give or give any payment or other incentive to any person outside Ipsos to obtain an improper advantage or induce favourable action.

Unlawful payments include any monetary incentive, including cash, gifts, free samples, payment of non-essential travel and entertainment expenses, as well as facilitation payments. In addition, bribes to any person, company or government official are strictly prohibited.

Any direct or indirect benefit granted to Ipsos or Ipsos' employees (or their family members) by a third party is prohibited because it may result in dependency and may affect the recipient's decision-making process in performing their duty.

Exceptions to this are small gifts of negligible value deemed to be common in the context of relevant standard business practice, such as occasional promotional gifts or invitations. The value of such benefits has to remain reasonable, and in all cases, local laws must be respected.

2.9 ANTI-CORRUPTION

Ipsos' Anti-Corruption Policy can be found in ***Section 1.7*** of the Book of Policies and Procedures. Ipsos' parent company is French and therefore, the policy is modeled on Loi Sapin II, the French anti-corruption law.

Ipsos strictly prohibits all corrupt practices and will not tolerate any violation of laws or regulations relating to anti-corruption, bribery and similar matters.

2.10 GRIEVANCE AND DISCIPLINARY PROCEDURE

Each Ipsos entity abides by applicable regulations in their jurisdiction and follows fair procedures in dealing with disciplinary, dismissal and grievance issues, should any arise. Please refer to the HR Department of your country for additional information.

2.11 SECONDARY ACTIVITIES

We define a secondary activity as one whereby a member of Ipsos staff provides their services, with or without remuneration, outside of the working relationship with Ipsos. In general, Ipsos encourages participation in voluntary and unpaid charity work as part of its social impact. Ipsos permits two days of paid time off per year to all employees in order to enable them to participate in volunteer activities, such as joining a charity board or a commercial organisation board. Beyond this, secondary activities are only permissible if they do not restrict the work or diminish the performance capability of the Ipsos employee(s) concerned, and if there are no associated conflicts of interest. If you would like to participate in such an activity, contact your local HR representative and the Group General Counsel, who will initiate the necessary approval process.

2.12 TIMESHEET COMPLIANCE

Each week, all Ipsos employees and managers must record their time in the Ipsos Timesheet System (iTime) against jobs they are working on and other tasks they might be pursuing, including declaring their absences and holidays.

Time should be recorded in an accurate manner. All managers are expected to reinforce the importance of timeliness and accuracy.

2.13 DATA PROTECTION AND PRIVACY

Ipsos collects and analyzes private information about individuals and needs to collect and use information about people it deals with, including its employees and contractors, in a transparent, safe and effective manner. Compliance with relevant privacy and data protection laws and regulations is essential. The Ipsos Global Privacy and Data Protection Policy adopts the fundamental principles of the EU's General Data Protection Regulation ("GDPR") as the minimum standard to which Ipsos Group, its employees and suppliers are required to adhere regarding privacy and data protection. Personal data (also erroneously referred to as "personally identifiable information" or "PII") must be treated as confidential information and handled in strict compliance with our legal obligations. It may only be used for the purposes for which it was collected and must not be disclosed to third parties without appropriate authorization.

Protecting the data privacy of our respondents is our responsibility and one of our highest priorities.

We have designated a Global Chief Privacy Officer and Data Protection Officers in each country.

For more information on data protection or privacy obligations, please see the Ipsos Global Privacy and Data Protection Policy in Section 8.1 of the Book of Policies and Procedures. Privacy training is also available on our intranet. If you have questions, please contact your local Data Protection Officer or the Legal Department.

2.14 COMPUTER, EMAIL AND INTERNET POLICIES

Every employee is responsible for using Ipsos' computer systems, including PCs, laptops, work phones, servers, cloud applications and platforms, its electronic mail (email) system and the internet, properly and in accordance with Ipsos policies.

See Ipsos' Information Security Policy in ***Section 7.2*** of the Book of Policies and Procedures. Any questions about these policies should be addressed to the employee's immediate supervisor or the Country IT Services managers. Employees should be particularly aware of the following:

1 Computer security

2 Avoiding external fraud and protection of your computer from external risks such as:

- Phishing Attempts
- Hacking
- Malware
- Social Engineering

See Section 5 (Fraud Prevention and Raising Concerns) for further details, including instructions on what to do if you receive an email that you suspect is an attempt at external fraud.

3 No expectation of privacy

Ipsos reserves the right to monitor any and all aspects of its computer systems, including reviewing documents created and stored on its computer system, deleting any matter stored in its system, monitoring sites visited by employees on the internet, monitoring chat and news groups, reviewing material down-loaded or uploaded by users from the internet, and reviewing email sent and received by users. Employees should not have an expectation of privacy in anything they create, store, send or receive on an Ipsos computer system or device.

4 Solicitations; offensive and inappropriate material; illegal activities

Employees may not use Ipsos' computer system to solicit for religious or political causes, commercial enterprises, outside organisations, or other activities not related to an employee's responsibilities at Ipsos. Using the Ipsos computer system to send messages or files that are illegal, sexually explicit, abusive, offensive or profane is prohibited.

5

Copyrights and trade secrets

Ipsos' computer system may not be used to send (upload) copyrighted materials, trade secrets, proprietary financial information or similar materials, unless for Ipsos' business purposes, and then only if sufficiently secured and legally permissible.

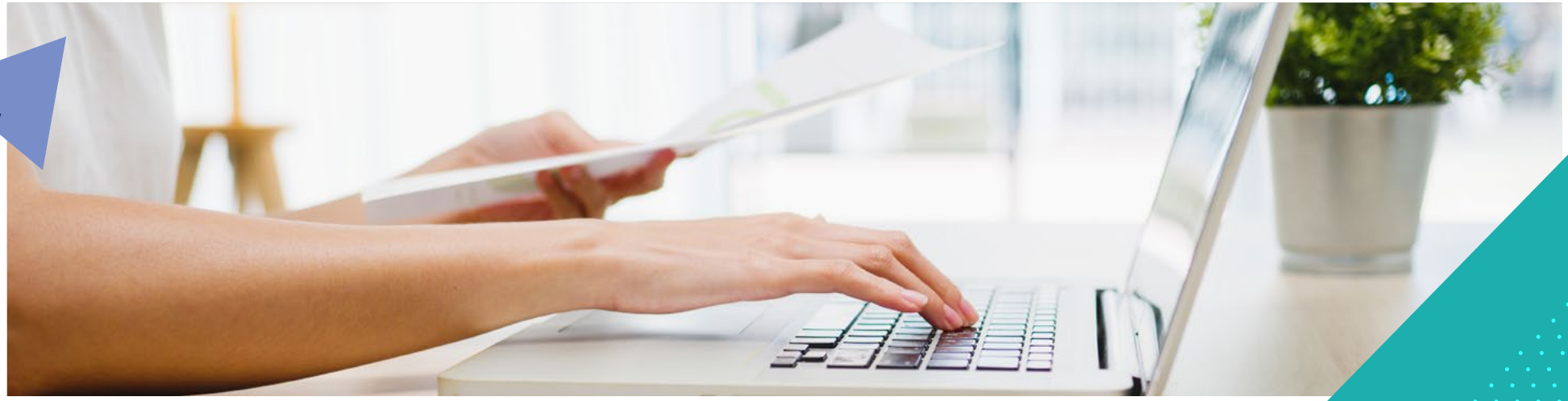
6

Document retention

The periodic deletion of documents is necessary to save storage space and costs. However, there are sometimes legal requirements that certain records be retained for specific periods of time. Retention and disposition of documents must be in accordance with the Information Security Policy in ***Section 7.2*** of the Book of Policies and Procedures.

When documents may be required in connection with a lawsuit or government investigation, all possibly relevant documents should be preserved, and ordinary disposal or alteration of documents pertaining to the subjects of the litigation or investigation must be suspended immediately. Furthermore, an IT representative should be immediately notified so that IT can assist with the preservation of any electronic records. If an employee is uncertain whether documents under their control should be preserved because they might relate to a lawsuit or investigation, the employee should contact the Legal Department.

All documents related to clients' projects and any other information which belongs to Ipsos must not be transferred or kept on personal computers and systems and must be stored using Ipsos' internal systems. Employees must not use personal e-mail systems for business purposes.



2.15 IPSOS MEDIA GUIDELINES

Guidelines for Publication by Ipsos Employees of Client and Third-Party Names/Logos

Employees should abide by all relevant copyright and other intellectual property rights, as well as normal computer use policies, when publishing content in the public domain, specifically:

1. Ipsos, client or third-party names, logos or trademarks should not be used without written agreement from the relevant intellectual property owner.

2. Employees are contractually obliged to maintain the confidentiality of client and respondent information as well as the information of any third parties with whom we have signed non-disclosure agreements.

3. Neither Ipsos nor any of its suppliers should publicly use the other party's name without its prior written consent.

4. Where approval to cite or reference clients or suppliers is granted, employees must ensure the information published is fair, accurate and will not allow inferences to be drawn which could embarrass or damage the client/supplier.

5. Any published content must accurately represent Ipsos' position, strategy or opinion and should be reviewed and approved in advance by the relevant service line leader.

Guidelines for Publication by Clients Using Ipsos' Name or Work Product

From time-to-time, our clients commission research that is released to the media, to stakeholders such as governments, or used in client advertising and promotional materials. Because our name is often associated with these results and the Ipsos name (our brand equity) is valuable, this process must be managed very carefully, and we have a professional obligation to ensure that the results are depicted accurately. Otherwise, we run the risk of tarnishing our credibility and irreversibly diminishing the value of our name.

The Ipsos Media Release Policy for Surveys, which can be found in ***Section 2.2*** of the Ipsos Book of Policies and Procedures, lists the principles that must be followed whenever a client intends to (or believes that it may) publicly release research results. These include, without limitation, the following:

1. Ideally, clients should inform Ipsos upfront if the client knows the results are intended to be used in the public domain.
2. Similarly, at the start of any research assignment that could involve a public release of research results, clients must be made aware of the Ipsos Media Release Policy for Surveys.
3. All questionnaires associated with research for public release need to be approved by Ipsos at the local level by the Country Manager or their designee prior to fielding.
4. Clients are never permitted to use our name in the public domain for advertising or promotional purposes without our prior written consent, and this must be provided for in all of our contracts.
5. For claims testing, it is mandated that the Country Manager or their designee review both the use of Ipsos' name, and the context in which it is used, to avoid mistakes. The study design (prior to the commencement of the study), collected data and potential claims must be reviewed and approved by the Country Manager or their designee.
6. Clients should not be permitted to make the results of our research public without our advance permission even if the Ipsos name is not used. This is our position for our client contracts, but if the client refuses to agree to this restriction, then they must indemnify us if their use of the results causes us to face third party liability.

For tobacco/e-cigarette clients, Ipsos has a specific policy with respect to the publication of research results and the use of our name. Please ensure that in any instance where such client expects to publish results that you first ensure Ipsos can perform the work by consulting the Media Release Policy for Tobacco and E-Cigarette Research Services in Section 2.2.1 of the Book of Policies and Procedures. You may contact the Group General Counsel if you have any questions.

See the Ipsos Media Release Policy for Surveys (in ***Section 2.2*** of the Book of Policies and Procedures) for a full list of principles and additional details.

Social Media Policy

We encourage sensible social media use. We want to share our key findings and raise the profile of the company.

At the same time, employees must make it clear in their social media profile that their posts related to Ipsos, the market research industry or any Ipsos clients are personal and do not reflect the views and opinions of Ipsos.

Employees must show proper consideration for topics that may be considered objectionable, inflammatory or controversial or which otherwise might offend our clients or large segments of society. If posting from an account that acknowledges your employment at Ipsos, we expect you to ensure that all opinions you make are based on firm evidence/data that can be cited to support any assertions made.

On these public sites, each employee's personal views can be construed as an expression of the company's position, so we all need to exercise our points of view in a professional manner.

Please review the Social Media Policy in ***Section 2.3*** of the Book of Policies and Procedures for additional details.

2.16 WORKING IN A LISTED COMPANY

Each employee must be aware of the particular restrictions associated with Ipsos being a listed company. See the Insider Trading Rules and Practices on the Global Intranet and in ***Section 1.4*** of the Book of Policies and Procedures.

Where employees obtain information concerning the business of Ipsos or its clients which might potentially affect the price of Ipsos stock, the confidentiality of this information must be preserved and may not be used or disclosed. Any use of such information for an employee's own purposes or in the interests of third parties is strictly prohibited. For purposes of clarity, this means you cannot trade in Ipsos securities if you have this kind of sensitive information.

All financial information not included in our annual or half-year reports or press releases, or not disclosed during a quarterly result call or in our Investors Day presentation, all of which are available on www.ipsos.com, is strictly confidential. Staff are not authorised to talk to third parties about Ipsos' strategic and financial affairs. In any instance where you are asked to provide non-public information to respond to an RFP or other client request, you must refer the request to your Country CFO, who will then seek the mandatory Group Finance approval before such information may be released.

Trading of any Ipsos securities, such as Ipsos shares (including free shares), is strictly forbidden for anyone who is registered on the list of Ipsos Insiders (including but not limited to members of the Executive Committee, members of the Group Management Committee, and any person working for Ipsos and having permanent access to Insider Information as a result of their function) during specific periods known as "black-out periods", which usually precede the public announcement of Ipsos' financial results. Trading by Non-Insider employees of Ipsos free shares or stock options is also strictly regulated. The precise rules that apply to the trading of Ipsos securities, as well as the annual calendar listing the black-out periods for Ipsos Insiders and employees, are published and available both on the Global Intranet under "Insider Trading Rules and Practices" and in Section 1.4 of the Book of Policies and Procedures.

2.17 APPROVAL LIMITS

The Approval Limit Guidelines, which can be found in Section 1.13 of the Book of Policies and Procedures, (1) establish who in the Ipsos organization has authority to make decisions and sign documents on behalf of Ipsos, (2) specify what actions require Group approval and (3) set out, with respect to each action, who needs to be involved in the approval process.

The Approval Limit Guidelines cover the following areas:

- **Business acquisitions/divestitures, joint ventures, partnerships, cooperation agreements, strategic IT investments, licensing of IP and other transactions**
- **IP rights and rules regarding use of the Ipsos name**
- **Leases**
- **Client contracts and RFPs**
- **Vendor and other contracts – including agreements with competitors (which need Group approval)**
- **Financial operations (financing, bank relationships, letters of comfort, guarantees, etc.)**
- **Insurance**
- **HR (hiring, dismissal, compensation, etc.)**
- **Pension and similar benefits**
- **Share based payments (stock options, bonus shares, etc.)**
- **Litigation**
- **Corporate and other**

For each action, the Approval Limit Guidelines identify (1) the final decision maker, (2) those who also need to review and approve the action, (3) the person to contact to initiate the decision process and (4) those who need to be informed or consulted.

One of the key principles to remember is that certain actions can only be approved at the Group level—local and even regional approval is insufficient.

Here are some examples of actions that must be approved at the Group level:

- **Mergers and acquisitions**
- **Joint ventures**
- **Partnerships and cooperation agreements (especially where co-branding exists)**
- **Developing IP for clients**
- **Investments in IT**
- **Co-branding with any vendors or Ipsos competitors**
- **Real estate transactions including entering into leases over a certain threshold**
- **Certain financial terms in client agreements, such as payment terms that exceed 90 days**
- **Hiring Level 1 or 2 employees or promoting current employees to Level 1 or Level 2**

3

OUR PROFESSIONAL OBLIGATIONS

3 OUR PROFESSIONAL OBLIGATIONS

3.1 ADHERENCE TO THE ESOMAR CODE OF MARKET AND SOCIAL RESEARCH

We take our professional responsibilities very seriously. We adhere to the letter and the spirit of conducting relevant business under the terms of the ICC/ESOMAR International Code on Market, Opinion and Social Research and Data Analytics (the "Code"). Ipsos has entered into a global agreement with ESOMAR to be bound by the Code, which provides safeguards for the public, clients and research agencies.

3.2 INTEGRITY OF RELATIONSHIPS WITH CLIENTS, SUPPLIERS, RESPONDENTS AND OTHERS

We also have a duty of fair treatment to our clients, suppliers, competitors and any other stakeholders. The essence of Ipsos' business is based on the integrity of the data measurement, products and services that we sell to our clients.

3.3 CONFIDENTIALITY

Compliance with confidentiality obligations towards clients and third parties is fundamental. Employees, suppliers, and contractors may have access to confidential information relating to Ipsos, our clients, suppliers, respondents or other stakeholders ("Confidential Information").

Confidential Information must be stored securely and conveyed only to those persons who have a "need to know" and are bound by confidentiality obligations in their respective agreements.

In certain situations, clients contractually require Ipsos to segregate their Confidential Information, which will require collaboration with IT to ensure compliance with such contractual provisions.

Employees and contractors may not do any of the following:

- ✕ **Discuss Confidential Information outside work;**
- ✕ **Share any results of their work without Ipsos' authorisation;**
- ✕ **Try to obtain access to Confidential Information related to clients or projects that they are not working on, or if not otherwise related to a specific business need; and**
- ✕ **Discuss a client's Confidential Information with other Ipsos employees who are not working on matters for the same client.**

Non-Disclosure Agreements are mandatory for all disclosures to third parties:

Confidential Information cannot be disclosed to any third party (client, vendor or otherwise) without that third party first signing a non-disclosure agreement ("NDA").

Disclosures to third parties without the protection of a NDA can result in Ipsos losing its valuable trade secrets and other proprietary information because the information is now in the public domain and not covered by any confidentiality obligations.

The Legal Department has prepared a standard NDA that can be provided to third parties. When a third party provides its own nondisclosure agreement or a third party proposes revisions to the Ipsos NDA, the Legal Department should be involved in the review. The Legal Department will lead negotiations to finalize the agreement and coordinate the signing process.

See the Ipsos Information Management Policy in Section 7.4 of the Book of Policies and Procedures.

3.4 IPSOS INTELLECTUAL PROPERTY

When delivering professional services to its clients, Ipsos can draw upon its broad collection of Intellectual Property developed and accumulated over time.

Intellectual Property includes, without limitation:

i. **Any proposals for clients**

ii. **Ipsos' trademarks, logos, copyrights, trade secrets and other intellectual property rights;**

iii. **Ipsos' know how, technologies, and proprietary methodologies, including, without limitation, processes, products, tools, formulae, algorithms, lesson learned presentations, models, databases, computer programs and software used, created or developed by Ipsos in connection with Ipsos' performance of services, including, without limitation, any derivatives, modifications or enhancements thereto; and**

iv. **All questions and questionnaires.**

Never disclose Ipsos Intellectual Property without ensuring that an NDA is already in place.

Ipsos owns all intellectual property rights developed by its employees and contractors related to the Ipsos business, whether developed during or after usual working hours, and whether on or off the premises.

Any questions about the protection of Ipsos Intellectual Property, including a client request to develop intellectual property, should be directed to the Legal Department.

3.5 ANTI-TRUST, ANTI-CARTEL AND ANTI-COMPETITION POLICY

Anti-trust and competition laws and regulations are issued by a national or regional government or agency and have a national, regional and/or global reach. These laws and regulations define acceptable competitive behaviour when operating in a given territory and aim at promoting fair competition. Ipsos strictly prohibits any actions that would violate antitrust and competition laws and regulations.

3.6 SEPARATION OF PERSONAL AND BUSINESS EXPENSES

Personal and business expenses must be kept separate at all times.

Personal expenses must not be settled through Ipsos accounts (unless duly authorised and reimbursed promptly). Reimbursement of employee expenses is subject to prior consent of your manager and all expenses shall be incurred and recorded in accordance with the following:

i. the Ipsos Group's Travel and Expenses Policy, which can be found in Section 4.6 of the Book of Policies and Procedures; and

ii. your local Travel policy (if relevant).

The resources and assets of Ipsos or Ipsos stakeholders shall not be used for personal purposes.

Subject to applicable law, Ipsos reserves the right to deduct any amounts you owe to the company from your salary.

3.7 CONFLICT OF INTEREST

Personal interests must not interfere with business relationships or decisions, which should be based solely on business and ethical considerations. Contracts shall be awarded strictly on the basis of objective principles. This also applies to the hiring and evaluation of employees.

When does a conflict of interest exist?

It exists if an employee has a personal relationship with, or a financial interest in, a potential business partner (such as a vendor) or a potential employee or contractor. Examples include:

i. Hiring a company where your spouse works;

ii. Entering into a partnership with a company in which you or a family member has an ownership interest; or

iii. Hiring a family member as a consultant.

Apotential conflict of interest can only be addressed by obtaining a written conflict of interest waiver from the Group (i.e., the Global Quality and Audit Director). Even if an employee gets approval from their manager, HR, or anyone else, unless they have obtained a written waiver from the Group, that conflict still exists from the company's perspective. An employee with a potential conflict should contact HR or a member of the Legal Department to initiate the approval process.

For further information, see the Anti-Corruption Policy in Section 1.7 of the Book of Policies and Procedures.

3.8 INTEGRITY OF PROJECT AND FINANCIAL RECORDS

Ipsos requires fair, timely, full and accurate recording and reporting of project related and financial information. All supporting documents must be maintained and presented in accordance with these standards, local law and generally accepted accounting principles.

Job owners and service line leaders have the duty to ensure that all financial information on proposals and projects is kept accurate, complete and updated.

3.9 POLITICAL CONTRIBUTIONS AND GOVERNMENT RELATIONS

Due to the nature of the work undertaken by Ipsos (i.e., social research, opinion and political polls), it is important that Ipsos always maintains a neutral, non-partisan position. This also applies to Ipsos' managers and spokespersons as far as their public statements are concerned.

Financial contributions to political parties, politicians or related institutions in the name of Ipsos are not allowed under any circumstances.

4 FRAUD PREVENTION AND RAISING CONCERNS

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4.1 FRAUD PREVENTION

Fraud, in the corporate setting, can be defined as any deceitful practice, willful scheme, or intentional distortion of financial statements or other records or information by a person, internal or external to the organisation, that is carried out to conceal or induce the misappropriation of assets or otherwise for improper benefit.

Fraud can occur internally (e.g., by an employee) or externally (usually using electronic means, such as via email or email attachments, to steal financial and other sensitive data belonging to Ipsos and our clients and/or to fraudulently induce us to make payments by impersonating vendors and Ipsos personnel).

A key component of fraud prevention is to make every employee of the Group aware of the risks, the controls we can set up to avoid fraud, and the actions to take in case fraud is encountered in one's area of responsibility. This applies to any fraud or suspected fraud, theft, money-laundering, waste or abuse involving an employee (including management), a consultant, a vendor, or a contractor.

> **Measures that can be taken to reduce the possibility of fraud or theft include the following: assessing the exposure, implementing adequate internal controls, segregating duties, and regular reviews by management.**

To avoid internal fraud, managers and staff must ensure the security of Ipsos' assets within their area of responsibility and should be alerted to any warning sign that might indicate that fraud may be taking place, such as: unusual employee behaviour, reluctance to take leave, a cosy relationship with contractors/suppliers, and missing documentation.

To avoid external fraud, our Information Security personnel have recommended that each employee take the following precautions in order to mitigate the risk of a security breach: do not click on any links or open any attachments that come from strange email addresses and immediately send such emails as attachments (do not forward these emails) to the Global Security team; and if you receive an unusual request from someone who supposedly works for Ipsos, please carefully look at the email address and verify via a phone call that it is a legitimate request. Note that as an added security measure, a warning banner is displayed at the top of each external email.

For additional information, please take the **Information Security User Awareness Training**, which is available on the Ipsos Training Center.

Employees are required to update their Ipsos credentials (i.e., individual choice of password) regularly, based on the guidance of our Information Security personnel, and strictly restrict access to the Ipsos network and systems. Reuse of the same password from a social media site such as LinkedIn or Facebook to access Ipsos' network is prohibited by Ipsos' Information Security Policy in Section 7.2 of the Book of Policies and Procedures.

When an employee suspects fraud, they must first report the incident to their line manager, who must ensure that, within 24 hours, the fraud is reported to the Global Quality and Audit Director and the Group CFO. If the employee is not comfortable with this procedure (for example, if the report of fraud concerns the line manager or their supervisor), the employee must report the fraud via the whistle-blowing system described below.

A fraud response plan ensures that timely and effective action can be taken to prevent loss of funds, reduce adverse impact on the business and prevent fraud in the future.

The Anti-Fraud Policy is available in ***Section 1.6*** of the Book of Policies and Procedures.

Raising other concerns: Concerns about corruption or any other significant breaches of Ipsos' policies set forth in this Code of Conduct and the Book of Policies and Procedures should be reported using the same process as reporting fraud (namely, report to your line manager, who must report to the Group within 24 hours, or via the whistle-blowing system).

4.2 THE WHISTLE-BLOWING SYSTEM

The whistle-blowing system can be used to report fraud or any other violation of Ipsos' policies, including acts of harassment or discrimination at Ipsos.

Two different methods can be used to report a concern via the whistle-blowing system to an independent company, EthicsPoint:

i. By telephone: using the Freephone numbers shown on the Ipsos Intranet

ii. By web reporting: www.ipsos.com/en/our-alert-system or via the link pages on the Ipsos Intranet

Who will access the information provided? What outcomes are reported?

Cases raised via the whistle-blowing system are transmitted to the Group Audit department on an anonymous basis unless the employee agrees otherwise.

The system is structured to organise a verification of the data collected in order to enable Ipsos to decide what measures should be taken to address the issue raised. Follow up on all cases will be made in a consistent and efficient way and will be reported to the Group Audit department and any other appropriate people.

Unless the report was made anonymously, and unless otherwise inappropriate, the employee raising the concern will be informed of the status of the report and any remedial measures taken.

Ipsos: Our Code of Conduct

Ipsos
35, rue du Val de Marne - 75013 Paris - France
ipsoscommunications@ipsos.com

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