
Code of Business Conduct

May 2026

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1. Introduction

The ORIS Code of Business Conduct provides guidance and examples on how ORIS engages in business relations, with the highest moral and ethical standards. It helps our employees to navigate the complexity of business engagement, and - while it cannot anticipate every situation we might encounter in the workplace - it helps us to make sound and ethical decisions.

We expect our employees to have the courage to make the right decisions based on our ethical principles and to uphold them, even when under pressure. Using common sense and good judgment together with our Code and ORIS policies will ensure business is conducted with integrity at all times.

2. Scope of Policy

This Code applies to every ORIS employee and manager. All must follow this Code at all times when representing or working for ORIS.

All service providers and subcontractors acting on our behalf or in our name are required to act consistently with our Code.

If there is a difference between a local legal requirement and our Code, we always apply the higher standard.

3. Our Core Values: Care, Dare, Together

In 2024, ORIS formalized its core values—Care, Dare, Together—building on principles that have long defined our company culture. These values guide how we work, make decisions, and interact with each other, creating a strong and cohesive foundation for achieving our growth and mission to transform the infrastructure construction industry towards sustainability, using advanced digitalization.

Care is central to who we are at ORIS. We prioritize respect, and empathy, fostering an environment where everyone feels valued and supported. This extends to our commitment to delivering high-quality work that meets the needs of our stakeholders and contributes to a sustainable future. In caring for our stakeholders, a high ethical approach is indisputable.

Dare to innovate and push boundaries defines our approach. At ORIS, we empower individuals to think creatively, take ownership of their work, and embrace new challenges. This value drives our commitment to exploring innovative digital solutions and bold ideas that enable sustainable infrastructure. It also reflects our belief in continuous improvement, where calculated risks and learning from experiences are key to advancing our goals and driving impact. Taking risks must remain within the ethical and moral boundaries as set in this Code.

Together - Collaboration is at the heart of everything we do. ORIS thrives on the diversity of perspectives within our team, ensuring that everyone's voice is heard and valued. By

working together with trust, open communication, and mutual support, we achieve shared success and overcome challenges as a unified team. This collective spirit extends to how we engage with our customers and partners and we believe it has to be done on the basis of a shared common understanding of ethical values as outlined in this Code of Conduct

4. Our Vision: High Ethical and Business Standards

4.1 Mission Statement

As formalised in 2024, our mission is to "Enable the construction sector to design inclusive, efficient, resilient and low-carbon infrastructure projects by making the most of local resources and social & environmental data, connecting them through digital solutions (AI, data science and engineering)."

This mission drives our commitment to:

1. **Provide digitized knowledge** of the impact of the choice of construction materials used in infrastructure
2. **Enable the infrastructure construction sector** to measure and optimize the environmental impact of materials
3. **Contribute to inclusive transport networks** in line with global development objectives
4. **Build equitable and balanced growth** through an HR approach that cares about the well-being of employees and maintains healthy workplace relationships

Such a mission statement puts sustainability at the core of everything we do. And we believe that high integrity is key in delivering long term sustainable value.

4.2 Environmental and Social Responsibility

Through its core activity, ORIS is committed to supporting its clients and partners in protecting the environment and enhancing social impact for the benefits of local communities. We are particularly active in contributing to:

- Greenhouse gas emissions reduction
- Energy and water use reduction
- Circularity, reuse and reduction in use of primary raw materials
- Use of local materials and content
- Risk assessment and adaptation to climate change effects
- Rebalancing investments towards rural communities through our Roads4People program with UNIDO
- Compliance with environmental laws and carbon neutrality ambitions

4.3 Commitment and Responsibility

All concerned employees receive training on ethics and compliance. Managers are also expected to create an open environment where everyone feels comfortable to ask questions, raise concerns, and report misconduct.

5. Ethics and Integrity

5.1 Human Rights and Labor Law

We are committed to respecting human rights wherever we conduct business. We prohibit and will not knowingly do business with any individual or company that participates in:

- Exploitation of children, including child labor
- Physical punishment or violence towards employees
- Forced or compulsory labor
- Provision of unsafe working conditions
- Salary payments that illegally leave workers below minimum wage

5.2 Conflict of Interest

We are required to make business decisions in the best interests of ORIS, not based on personal interests. A conflict of interest may arise when a person's personal and family interests interfere, or may be perceived as interfering, with our ability to do business in the most efficient way.

You must disclose promptly to your manager any relationship or activity that might impair your judgement or your ability to make objective decisions when taking decisions on behalf of ORIS.

Example: A supplier is in competition with two other companies to work with ORIS. If your father-in-law owns the supplying company, your decision-making should not be influenced by this personal relationship. You must act in ORIS' best interests and report the conflict to your manager.

5.3 Anti-Bribery and Corruption

ORIS sells its products and services based on quality and reliability, never bribes. Paying bribes causes tremendous harm to doing good business.

It is never acceptable to offer, give, authorize, or receive any form of bribe or kickback, including to or from any public official or private person. We do not ask or hire third parties to do such things.

Example: During negotiations for a new road assessment project, a public official indicates that ORIS' support in her reelection plans would help to secure the contract. This could be considered a breach in anti-corruption laws and should be reported immediately to your manager, HR or someone in the Management Team.

5.4 Money Laundering

We do business with reputable partners who conduct lawful business activities and whose funds come from legitimate sources. Money laundering involves disguising the source of money connected with criminal activity.

We are vigilant in detecting payment irregularities and suspicious behavior. If you have suspicions about a proposed transaction, raise questions with your manager immediately.

5.5 Fraud

Falsification or improper recording of transactions is prohibited. You must never instruct someone else to prepare false records or do so yourself at another person's direction. We are also accurate and truthful in all communications. Sanctions and penalties will apply.

Example: Recording an unconfirmed sale in the wrong quarterly period to meet targets is misrepresentation and could amount to accounting irregularities, even if the sale will be finalized the following week.

6. Fairness

6.1 Fair Competition

We are committed to competing vigorously but fairly. Employees must never enter into agreements with competitors to fix prices, limit supply, allocate markets, coordinate bids, or engage in any behavior that limits competition.

6.2 Neutrality

ORIS maintains strict neutrality in its results and recommendations. While ORIS may work with business players across different sectors, including those in competition with one another, ORIS does not favor any actors, sectors, or construction materials in its assessments. All performance evaluations are based on internationally recognized standards and objective metrics.

6.3 Gifts and Hospitality

Good business relationships are built on trust and goodwill. Gifts and hospitality must always be moderate and should never be used to exert improper influence or create conflicts of interest. By exercising common sense, discretion, and sound judgment before offering or receiving any gifts or hospitality, we can avoid good intentions being misinterpreted. A Gift and Hospitality Policy has been developed more specifically on this.

Examples: During price or contract negotiations, neither party should offer or accept gifts, entertainment, or other benefits (such as event tickets) before the contract is finalized, as this may compromise objective judgment and fair decision-making.

7. Employee Behavior

7.1 Respectful Work Environment and Wellbeing

At ORIS, we are committed to creating a workplace where everyone feels valued, heard, and supported. We promote a culture of mutual respect, collaboration, and wellbeing that enables all employees to thrive both professionally and personally.

Respectful Communication and Collaboration: We encourage open dialogue where every voice matters. We listen actively to others' perspectives, even when opinions differ. We approach disagreements with curiosity rather than defensiveness, seeking to understand before responding.

Mutual Support and Stress Management: We recognize that work can be demanding. We support colleagues during busy periods and challenging projects. We encourage our colleagues to be open about workload and stress levels, as asking for help is a sign of strength, not weakness. We encourage practices that promote wellbeing, including taking regular breaks and using stress management techniques that work for each individual.

Work-Life Balance: We respect that our employees have lives, families, and interests outside of work. We encourage to set healthy boundaries around working hours and disconnect when off duty.

Creating this environment is everyone's responsibility. If you observe behavior that undermines our respectful workplace, address it directly with the person involved when appropriate, or raise it with your manager, the Culture Team, or Human Resources.

7.2 Diversity and Inclusion

We believe in treating each other with dignity, appreciating diversity whether it exists because of race, religion, gender, sexual orientation, or any other difference. We value and promote a workplace that is inclusive and fair, which fosters respect for all employees, customers, and business partners.

All employees will be treated fairly in matters affecting promotion, training, hiring, compensation, and termination.

7.3 Discrimination and Harassment

We work with individuals of various backgrounds and do not tolerate discrimination against anyone based on ethnic background, culture, religion, age, disability, medical condition, race, sexual identity, gender, world views, or affiliation to organizations.

Harassment is unwelcome behavior that creates an intimidating, hostile, or offensive work environment. This includes physical actions, verbal or written remarks, or visual depictions. ORIS strictly prohibits any form of harassment and will take seriously any wrong-doing.

Example: If a colleague regularly shares jokes that others find offensive, you should speak to your colleague about this behavior. If it doesn't stop or you feel uncomfortable, raise the matter with your manager, the Culture Team or Human Resources.

8. Data Privacy

8.1 Confidentiality and Data Protection

We regularly come in contact with data from our clients that are valuable, non-public and business information that must be protected and kept confidential. Improper disclosure of confidential information is prohibited.

Access to employee records and personal data is only permitted to persons with proper authority and in accordance with data privacy laws. We protect confidential information entrusted by customers, suppliers, and business partners as carefully as we protect our own.

8.2 Privacy

As ORIS takes data privacy and security seriously, you must comply with our policies under ISO 27001, SOC 2, and EU GDPR. Internal policies in this field are referenced [here](#). All business communication must be done using ORIS approved electronic communications and email accounts. Privacy screens should be used when working in a public environment on sensitive topics (preparing a bid, reviewing sales results, etc.)

Example: When commuting on public transport, be careful not to discuss non-public company information. Use privacy screens when working in public environments on sensitive topics (preparing a bid, reviewing sales results, etc.). When conducting telephone calls in public places, be mindful of your surroundings.

9. Whistleblower Line - Integrity Line

If you are uncomfortable discussing an issue with your manager or Human Resources, the ORIS Integrity Line provides another alternative to obtain advice or raise concerns about situations that violate our Code or the law.

Reports can be made at: <https://integrity.oris-connect.com>

Email: integrity@oris-connect.com

Your report will be read and investigated by the management team professionally. Reports will be treated confidentially and shared only with those who need to know to safeguard company interests.

Protection from Retaliation: ORIS does not tolerate retaliation against any employee who reports a concern in good faith. Individuals who take action against someone for raising concerns will be subject to disciplinary action.

10. Governance

The HR team with the Mission Committee and Culture Team are responsible for:

- Overseeing implementation and compliance with this Code
- Conducting regular reviews and updates
- Ensuring proper training and communication
- Investigating reported violations
- Maintaining the integrity of our ethical standards

11. Code Acknowledgment

All employees must sign and acknowledge receipt of this Code of Business Conduct.

12. Consequences of Violations

Violations of our Code, policies, directives, or the law can have serious consequences, including disciplinary action up to and including termination of employment, as well as possible civil or criminal penalties for both the company and individuals.

Before you act, always ask yourself:

- Could my conduct be viewed as dishonest, unethical, or unlawful?
- Would it damage ORIS or its reputation if it became public?
- Could it cause ORIS to lose credibility with employees, customers, shareholders, or communities?
- Might it hurt other people?

If the answer to any question is "YES" or "MAYBE," seek guidance from your manager, Human Resources, or via the [whistleblower channel](#).

13. Formal Review Mechanism

This Code will be formally reviewed on an ad hoc basis by the Mission Committee and its Culture Team to ensure it remains current and effective. Updates will be communicated to all employees. Any employee can raise concerns about the inadequation of this policy with the Mission Committee and its Culture Team.

The present Code has entered into force on April 22, 2026.

Nicolas Miravalls

P.O CEO

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Mission referent