



Non-discrimination and anti-harassment policy

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(The French version prevails)

1. Preamble / regulatory references

ABC arbitrage is firmly committed to maintaining a respectful, inclusive working environment, free from any form of discrimination or harassment. The aim of this policy is to prevent, identify, report and remedy any situation of discrimination or harassment in the course of its business, whether sexual or non-sexual, or any other form of discriminatory or harassing behavior.

Preventing verbal, sexist and sexual violence contributes directly to protecting employees' mental health. Indeed, it can have repercussions such as anxiety, depression, isolation and burn-out.

In its internal rules, ABC arbitrage draws attention to the main French regulatory provisions in this respect, in particular concerning :

- **sexist behaviour**: Pursuant to the provisions of article L. 1142-1 et seq. of the French Labor Code:
 - Article L1142-1 :

"Subject to the specific provisions of the present code, no one may :

1° Mention or cause to be mentioned in a job advertisement the sex or marital status of the candidate sought. This prohibition applies to all forms of recruitment advertising, whatever the nature of the employment contract envisaged;

2° Refusing to hire a person, making a transfer, terminating or refusing to renew an employee's employment contract on the grounds of sex, marital status or pregnancy, on the basis of selection criteria that differ according to sex, marital status or pregnancy;

3° Take into consideration gender or pregnancy in any measure, in particular with regard to remuneration, training, assignment, qualification, classification, professional promotion or transfer."

- Article L1142-2 :

"When being of one sex or the other meets an essential and determining professional requirement, and provided that the objective is legitimate and the requirement proportionate, the prohibitions set out in article L. 1142-1 do not apply.

A decree of the Conseil d'Etat, after consultation with representative employers' and employees' organizations at national level, shall determine the list of jobs and professional activities for which being of one or other sex constitutes the determining condition. This list is revised periodically".

- Article L1142-2-1 :

"No one shall be subjected to sexist behaviour, defined as any behaviour related to a person's gender, which has the purpose or effect of violating their dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment."

- Article L1142-3

"Any clause in a collective bargaining agreement or employment contract that reserves the benefit of any measure whatsoever to one or more employees on the basis of gender is null and void.

However, these provisions do not apply when the purpose of the clause is to apply provisions relating to :

1° Protection of pregnancy and maternity, as provided for in articles L. 1225-1 to L. 1225-28;

2° Prohibition of prenatal and postnatal employment, as provided for in article L. 1225-29;

3° breast-feeding, as provided for in articles L. 1225-30 to L. 1225-33;

4° to the resignation of an employee in a medically certified state of pregnancy, as provided for in article L. 1225-34;

5° Paternity and childcare leave, as provided for in articles L. 1225-35 and L. 1225-36;

6° Adoption leave, as provided for in articles L. 1225-37 to L. 1225-45."

- **Sexual harassment:** Pursuant to the provisions of article L. 1153-1 et seq. of the French Labor Code:

- Article L1153-1

"No employee shall be subjected to :

1° Either sexual harassment, constituted by repeated comments or behavior with a sexual or sexist connotation which either violate their dignity because of their degrading or humiliating nature, or create an intimidating, hostile or offensive situation against them ;

Sexual harassment also occurs:

a) When the same employee is subjected to such comments or behavior by several persons, in concert or at the instigation of one of them, even though each of these persons has not acted repeatedly;

b) When the same employee is subjected to such remarks or behavior, successively, by several persons who, even in the absence of concerted action, know that such remarks or behavior constitute repetition;

2° Is assimilated to sexual harassment, consisting of any form of serious pressure, even if not repeated, exercised with the real or apparent aim of obtaining an act of a sexual nature, whether this is sought for the benefit of the perpetrator or a third party."

- Article L1153-2 :

"No employee, no person undergoing training or internship, no candidate for recruitment, internship or in-company training may be punished, dismissed or subjected to any direct or indirect discriminatory measure, particularly in terms of remuneration, training, reclassification, assignment, qualification, classification, professional promotion, transfer or renewal of contract for having suffered or refused to suffer acts of sexual harassment as defined in Article L. 1153-1, including, in the case mentioned in 1° of the same article, if the comments or behaviour have not been repeated."

- Article L1153-3 :

"No employee, trainee or intern may be punished, dismissed or subjected to a discriminatory measure for having witnessed or reported acts of sexual harassment."

- **Moral harassment:** Pursuant to the provisions of article L. 1152-1 et seq. of the French Labor Code, as amended from time to time :

- Article L1152-1 :

"No employee shall be subjected to repeated acts of moral harassment which have as their object or effect a deterioration in his or her working conditions likely to infringe his or her rights and dignity, to alter his or her physical or mental health or to compromise his or her professional future."

- Article L1152-2 :

"No person who has suffered or refused to suffer repeated acts of moral harassment or who has, in good faith, reported or witnessed such acts may be subject to the measures mentioned in article L. 1121-2.

The persons mentioned in the first paragraph of this article benefit from the protections provided for in I and III of Article 10-1 and Articles 12 to 13-1 of Law 2016-1691 of December 9, 2016 on transparency, the fight against corruption and the modernization of economic life."

2. Scope

Provisions concerning the prohibition, prevention and repression of moral and sexual harassment and sexist behavior are explicitly included in the internal rules. Like the internal rules, this policy therefore applies to:

- any person bound by an employment contract to the "Unité Economique et Sociale" (UES) formed between Entreprises ABC arbitrage and ABC arbitrage Asset Management ("UES ABC arbitrage"),
- including temporary employees, apprentices and trainees working for companies belonging to the UES ABC arbitrage.

These provisions apply in general to all persons performing work or services within the companies of the UES ABC arbitrage. ABC arbitrage also reserves the right to take action if it becomes aware of actions contrary to this policy by its partners, subcontractors and members of its supply chain.

The provisions of the internal regulations apply not only in the workplace itself, but also in outbuildings (premises or areas outside the establishment).

These provisions cover the use of electronic communications, as also specified in the internal regulations. Electronic exchanges (mail, discussion forums, etc.) must respect the correctness normally expected in any type of exchange, whether written or oral. When using the information system, users are strictly forbidden to:

- consult, upload, store, distribute or forward information, images or files whose content is likely to offend the dignity of others, in particular to consult sites that are racist, pornographic or pedophilic, abusive, offending human dignity, revisionist, advocating discrimination on the basis of gender, sexual orientation, disability, religion or the political beliefs of a person or group of people;
- disseminate sensitive information without the prior written consent of his/her Manager;
- use web services not specifically authorized for the dissemination of information.

3. Zero tolerance and sanctions

ABC arbitrage adopts a zero-tolerance policy towards discrimination and harassment in order to guarantee a working environment in which all employees can grow without fear of discrimination, harassment or abusive behavior.

Discrimination or harassment of any kind is strictly forbidden within our company and in all professional interactions with our partners and suppliers:

- no form of discrimination based on origin, gender, color, religion, sexual orientation, disability, age or any other personal characteristic will be tolerated
- harassment in all its forms, whether sexual or non-sexual, including physical, verbal, non-verbal and emotional behavior that may create a hostile or intimidating environment, is explicitly prohibited

In the event of a breach of this policy, corrective measures will be taken in accordance with the internal rules. Such measures may range from a warning to termination of employment, depending on the seriousness of the offence. In addition, any partner or supplier violating this policy may be subject to contractual measures and partnership termination.

4. Whistleblower system

An internal whistle-blowing procedure enables an employee to reveal or report, confidentially and securely (specific mailbox), a crime or offence, a violation of the law or regulations (e.g. discrimination, harassment) of which he or she has personal knowledge.

An anonymous alert system has been set up to enable employees and third parties to report any suspicion of discrimination or harassment without risk of reprisal. Anyone who deems it necessary can make a report by e-mail to lanceurdalerteabc@gmail.com or by post to 18 Rue du 4 septembre, 75002 Paris. He/she will be informed as soon as possible that the alert has been received, of the reasonable and foreseeable time required to examine its admissibility, and of the procedures for following up the alert. In the case of anonymous mail, no confirmation of receipt or information on the action taken will be sent to the sender. Full details are available in the dedicated [procedure](#).

5. Publication and transparency

The prevention of verbal, sexist and sexual violence in the workplace is included in the company's internal rules. To ensure that this policy is widely disseminated and properly understood, the following principles are applied:

- **Accessibility:** This policy is available on the UES ABC arbitrage intranet.
- **Support:** The prevention of verbal, sexist and sexual violence within the company is included in the internal regulations, which are reviewed with each new employee, with a reminder of what it is and what the sanction would be. A meeting with the compliance officer is systematically organized within 6 months of new employees taking up their duties, to ensure that they fully understand the internal rules and procedures. A Disability Officer is also in charge of guiding, informing and supporting people with disabilities.
- **Reminders and communications:** Periodic reminders may be issued by means of memos or postings on signs reserved for this purpose. In addition, the articles of the French Labour Code on harassment are displayed in the office, and a member of the Comité Social et Economique (CSE) is the in-house referent for these issues.
- **CSR:** ABC arbitrage has a long-standing commitment to professional equality. In addition to complying with the law, a task force dedicated to diversity and inclusion issues can make recommendations.
- **Publication:** The policy is also publicly accessible on the Group's website to guarantee transparency and foster stakeholder confidence. ABC arbitrage undertakes to publish an annual review of breaches of its Code of Ethical Conduct, including violations relating to discrimination and harassment, in its voluntary extra-financial information report.