



# Non-discrimination and anti-harassment policy

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(The French version prevails)

## 1. Regulatory references and principles

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 in order to ensure the right to work free from discrimination, violence, and harassment in the workplace.

This policy covers all forms of discrimination and harassment, whether based on gender, origin, race, age, disability, sexual orientation, religion, political views, or any other protected characteristic.

It also includes behaviors known as “microaggressions,” defined as everyday comments, attitudes, or behaviors, sometimes implicit or unintentional that convey hostile, demeaning, or stereotypical messages toward a person or group.

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.

This policy complies with the applicable legal requirements in the jurisdictions where the ABC arbitration Group operates, including the provisions of the French Labor Code regarding non-discrimination, psychological harassment, and sexual harassment. In its internal rules, ABC arbitration 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."*

This policy is also consistent with applicable international human rights and labor standards, including International Labour Organization (ILO) Convention No. 100 concerning Equal Remuneration for Men and Women Workers for Work of Equal Value (1951).

Potential witnesses, that is, anyone present during an incident of discrimination, violence, or harassment who is not directly involved, are encouraged to show empathy toward victims and to help raise awareness of the workplace community's responsibility in preventing sexual harassment.

An active witness is someone who observes an act of violence, discrimination, or any other unacceptable or offensive behavior and takes action, for example, by reporting the discrimination or harassment, intervening to support a targeted colleague, or speaking privately with a colleague exhibiting such behavior or with the victim.

## 2. Scope

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

In line with best practices in corporate governance and social responsibility, the principles of this policy are intended to be applied, to the fullest extent possible and subject to applicable local laws, to all subsidiaries and entities of the ABC arbitrage Group located outside France.

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;
- disclose personal data or sensitive information without prior written authorization from their manager;
- use web services not specifically authorized for the dissemination of information.

### 3. Rights and Responsibilities

Employees have the right to work free from discrimination, violence, and harassment in the workplace.

It is the responsibility of employees to interact professionally and resolve issues in a non-violent manner.

Those targeted, victimized, or affected may discuss their situation with a confidential and informal resource, such as a harassment liaison (member of the CSE), who can assist them by explaining the applicable legal framework and the options available under the company's policies and practices, and by pointing them toward available support resources.

Employees who observe or become aware of inappropriate behavior should take the appropriate measures as described in this policy.

Employees must cooperate with any investigation into incidents of discrimination or harassment. Anyone providing evidence or information as part of an investigation, or participating in one, must maintain confidentiality, unless it is necessary to effectively address the issue. Appropriate measures will be taken to ensure the employee's safety. Employees must be aware of existing policies on this matter and complete all mandatory training on workplace discrimination and harassment provided by the company so that, where applicable, to be able to provide impartial support to the affected person, inform them, and refer them to appropriate resources, or report any incident to the Human Resources department, and take any other measures likely to mitigate hostility within the work environment or prevent harm to individuals.

No retaliation against an employee who reports acts of discrimination or harassment in good faith in accordance with this policy, nor against any person providing information in good faith, even if the investigation reveals no acts of discrimination, violence, or harassment, will be tolerated. Similarly, any manifestly false or proven allegation of discrimination or harassment will be sanctioned, and any person making a false allegation may be subject to disciplinary action.

This policy does not affect employees' right to file a complaint under the laws of the applicable jurisdiction.

## 4. 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
- repeated microaggressions or any behavior that contributes to creating a hostile, humiliating, or intimidating environment.

In the event of a breach of this policy, disciplinary 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.

## 5. Whistleblower system

A whistle-blowing procedure enables an employee or an external individual to report, confidentially and securely (specific mailbox), any violation of the law, regulations, or this policy of which he or she has knowledge. There is no deadline for submitting reports.

The Group's anonymous reporting system can be used to allow employees and third parties to report any suspected discrimination or harassment without fear of retaliation. Anyone who deems it necessary (the target, victim, affected person, or individuals with direct knowledge of possible discrimination or harassment) may submit a report via email to [lanceurdalerteabc@gmail.com](mailto:lanceurdalerteabc@gmail.com) or by mail to 18 Rue du 4 Septembre, 75002 Paris. Confirmation of receipt of the report, along with a reasonable and foreseeable timeframe for reviewing its admissibility and details regarding the follow-up actions taken, will be provided as soon as possible. In the case of an anonymous letter, no confirmation of receipt or information regarding the follow-up actions taken may be provided to the sender. Reports are processed according to a formalized procedure, ensuring their analysis, follow-up, and the implementation of appropriate corrective or disciplinary measures in the event of a proven violation. Full details are available in the dedicated public procedure.

## 6. Prevention

Preventing verbal, sexist, and sexual harassment in the workplace is addressed in the company's internal policies, which are reviewed with every new hire, including a reminder of what constitutes such behavior and the potential consequences. A meeting with the ethics officer is systematically scheduled within six months of an employee's start date to ensure a clear understanding of the internal policies and procedures.

Awareness-raising and training initiatives on the prevention of harassment and discrimination or on cognitive biases may be conducted.

A disability liaison officer is also responsible for guiding, informing, and supporting individuals with disabilities.

## 7. 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 and can be reached with any related inquiries.
- **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.
- **Monitoring:** The Group regularly collects and analyzes indicators related to diversity, equal treatment, and the work environment, including data broken down by gender (e.g., average years of service, new hires, days of remote work, family leave, etc.) and, where relevant and in compliance with regulatory requirements, by other diversity criteria. This information enables the Group to track any discrepancies, guide corrective actions, and evaluate the effectiveness of policies and measures aimed at preventing discrimination and harassment and promoting an inclusive and respectful work environment.
- **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 voluntarily disclosed sustainability information report.