



OVHCLOUD

CODE

OF ETHICS





OVHCLOUD
CODE
OF ETHICS













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A WORD

FROM OCTAVE

When I founded OVHcloud in 1999, I wanted to build a different kind of company. A company in which everyone is free to express their talents to boost innovation and benefit our customers.

This mindset is at the heart of the company, and integral to our organisation. The OVHcloud mindset is more than just a set of values. It lies within a particular ethical framework that guides both our internal interactions, and our external relationships.

Today, I am proud to present to you our Code of Ethics, which formalises, demonstrates and reinforces our commitments in this area. This Code of Ethics applies to all OVHcloud employees, and we must all adhere to it. Respect for one another and for the environment, questioning our place in society – these have always been part of OVHcloud's ethics and values. Setting these out clearly is important for me, and for us all.

Kind regards,

Octave Klaba, founder of OVHcloud



WHY WE ARE IMPLEMENTING THIS CODE OF ETHICS

Our Code of Ethics has special significance for the entire OVHcloud Group. We started creating this document because we wanted to share our values, and were conscious of the role we had to play in promoting a responsible business environment. The work allows us to set in stone the way we have always behaved, not because it's written down, but because it's part of the OVHcloud mindset.

TO SHARE OUR VISION OF BUSINESS WITH THE WIDEST POSSIBLE AUDIENCE

As society progresses, ethical values change. We keep pace with societal changes, so that we can grow together and remain a leader in these matters. As the European leader in cloud services, it is our responsibility to set out a framework, and define the rules that could become IT industry standards. We should look ahead, raise awareness and innovate in ethical areas, just as we are already doing in our core business.



OVHcloud CODE OF ETHICS

INTRODUCTION

TO CONTINUE DEVELOPING INTERNATIONALLY AND IN NEW MARKETS

Since the very beginning, OVHcloud has been a company that faces outwards towards the rest of the world. We are aware that different countries have different needs and requirements. But we know that for the Group as a whole to succeed, we need the full involvement of each one of you. This was the seed that has now grown into a shared culture, an OVHcloud culture. Our Code of Ethics allows us to formalise this shared framework. In this way, we can support and help all our employees to grow, by encouraging responsible behaviour. It also helps us to welcome all of our talents equally, whatever their backgrounds. In the context of our international development, this Code of Ethics also acts as a powerful tool for decision-making. It enables us, for example, to anticipate the basis of our relationships with future vendors and customers.

TO CONSOLIDATE OUR ORGANISATION IN LINE WITH THE GROUP'S MATURITY

The creation of our Code represents a strong commitment from the management of OVHcloud, who were involved in the process from the start. The management has made sure that this document is a faithful representation of our collective mindset, and is in line with our values. This is particularly true for the questioning aspect, which is part of our DNA. Our Code, and the guidelines it contains, will act as a valuable monitoring tool in this. The Group's executive committee are really looking forward to receiving your feedback and thoughts on the document.

TO STRENGTHEN THE ROLE OF COMPLIANCE IN OUR DEVELOPMENT

The work we carried out while developing our Code of Ethics has helped us get a clear picture of all topics related to compliance. These efforts make us able to address sensitive subjects, and place more emphasis on them. As a result, we have been able to define suitable methods and a framework for giving these issues the attention they deserve, and finding the best solutions.

WHO THE CODE IS FOR

Our Code of Ethics is a tool for raising awareness, and is freely available to everyone.

It enables us to formalise clear procedures for managing specific or difficult situations. In addition to traditional points of contact, like bodies that represent employees in certain countries, it also identifies our specialists in different areas of compliance: our Compliance team, our Staff Managers, our HR Business Partners (HRBP), etc.

Covering a variety of topics, our Code of Ethics protects and raises awareness among everyone within the OVHcloud Group.

It is also important for us to make this document freely available. We want to share our best practices and our vision of the business environment with as many people as possible.

OVHcloud CODE OF ETHICS

INTRODUCTION

OUR EMPLOYEES



To help our employees develop with a responsible approach.



SUPPORT
AND GUIDANCE

OUR CUSTOMERS AND VENDORS



To help our customers and vendors understand us better, and learn about our values and principles.

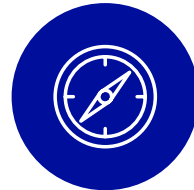


**AWARENESS
AND UNDERSTANDING**

OUR INVESTORS AND PARTNERS



To promote a responsible strategy for decision-making among our partners and investors.



**INSIGHT
AND VISION**

OUR VALUES

“People are at the centre of OVHcloud Group, in that the role of each employee is essential in offering the best possible quality of service. It is a real paradox for a company that manages so much physical infrastructure, so many machines and services. But it’s true: people are what our business is based on.”

Octave Klaba



INNOVATION, OUR DNA

Looking ahead and questioning ourselves are automatic reflexes at OVHcloud. It's what differentiates us from our competitors, and keeps us ahead of the market. Disruptive innovation is deeply ingrained in the Group's past and present activity. Our teams are constantly optimising and inventing in every single area of our business. They are practical, and highly determined. This continuous innovation doesn't only apply to technology. It's true for all areas of the company. Everyone has the opportunity and the means to bring new ideas to the table.

PASSION, OUR MINDSET

Passion is something all OVHcloud employees have in common. Passion for new technologies, and for the digital world. Passion for creating and delivering high-quality services for every single one of our stakeholders – not least, of course, our customers. This enthusiasm acts like an engine, driving us to develop our skills, and strive constantly for excellence – indeed, to go beyond the limits of excellence.



TEAMWORK, OUR STRENGTH

We are better together. OVHcloud is a team in which the whole is greater than the sum of its parts. It is a company in which solidarity, trust, integration and respect for individual talents allow us to achieve common goals. Our richness comes from exchanging ideas in an atmosphere that feels human, diverse and stimulating. Sharing our knowledge and experience is something we do every day. Just like the internet, our work is all about participation and collaboration. Our collective strength comes from individual fulfillment.



HOW

TO RESPECT

OUR COMMITMENTS

ONE PERSON = ONE VOICE





BY LEARNING
ABOUT OUR ETHICAL
COMMITMENTS



BY ADOPTING
AND ADHERING
TO THEM



BY SHARING THEM
EVERY DAY



BY BEING ALERT
TO RISKY BEHAVIOUR



BY REPORTING
VIOLATIONS TO HELP
PROTECT US ALL



BY CONTRIBUTING
TO THEIR DEVELOPMENT
AND GROWTH

OUR PROCEDURE FOR REPORTING VIOLATIONS

Since ethics are integral to our DNA, the OVHcloud Group's commitment to this matter is all the more important. That's why we are taking advantage of the French law on transparency, anti-corruption and economic modernisation, known as Sapin II, to formalise our practices and implement this Code of Ethics. This approach enables us to share our vision of the company today, and imagine its future development.

OVHcloud CODE OF ETHICS

INTRODUCTION

WHO CAN USE THE PROCEDURE FOR REPORTING VIOLATIONS?

This Code of Ethics and the procedure for reporting violations apply to the whole of the OVHcloud Group worldwide.

It can apply to anyone interacting with us: employees, customers, vendors, service providers and partners, as well as representatives of public authorities. Whatever your status or role, we guarantee that we will handle your report objectively.

Everyone has the right to the same level of attention, protection and thorough analysis.

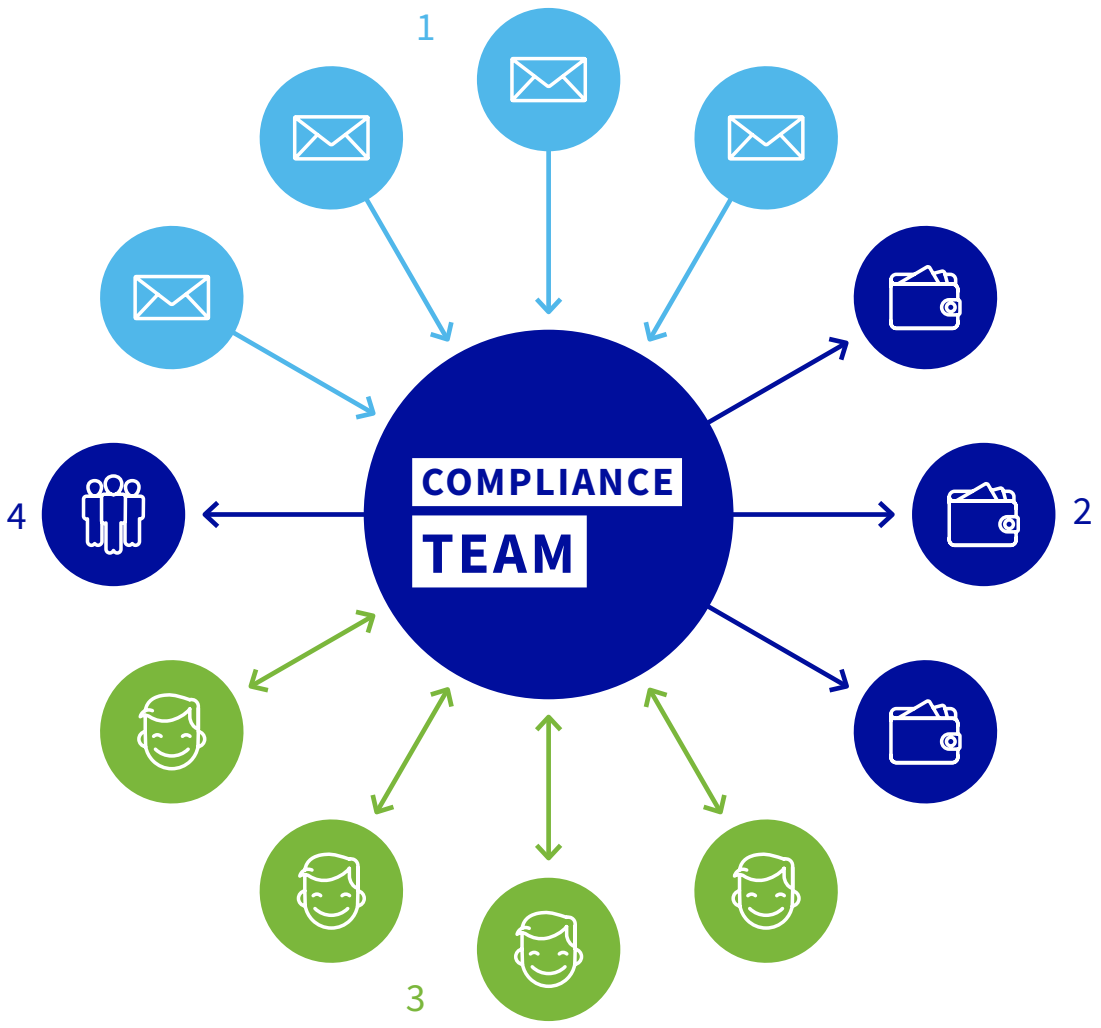
WHO IS RESPONSIBLE FOR IT WORKING PROPERLY?

Our Compliance team ensures that the procedure for reporting violations is correctly followed.

Its members are responsible for:

- receiving reports of violations (1)
- categorising them (2)
- communicating with the person who reports the violation (3)
- contacting the relevant ethics committee depending on the subject (4)

With strict confidentiality, the Compliance team will protect all those who report a violation, as well as analyse and deal with all aspects of each case.





HOW DOES OUR REPORTING PROCEDURE WORK IN PRACTICE?

A memorable name

ROGER stands for Respect OVHcloud Guidelines & Ethical Rules.

Via the ROGER platform, you can declare anything you observe that violates our Code of Ethics. It provides a central point for reporting violations, and tracking how they are handled. It also serves as a communication channel between our Compliance team and those who report a violation.

An online tool

The platform is accessible at any time, and from any device: computer, tablet or smartphone.

Secure interactions

Each report has a private messaging system for sending and receiving messages. This allows those who report a violation to remain anonymous if they wish.

Confidential and anonymous – guaranteed

Open to all, the ROGER platform accepts both internal and external reports of violations while respecting confidentiality and anonymity. There will be no reprisals against anyone who reports a violation.



BE PRUDENT

Although it is easy to report a violation, please be aware that this process carries great responsibility. For this reason, you should be fully able to justify the truthfulness of any facts observed, and statements reported. A declaration can have really serious consequences for the person or people involved, both professionally and personally. We therefore ask you to use your best judgement. Disciplinary action could be taken to punish false accusations.



OVHcloud CODE OF ETHICS

OUR RESPONSIBILITY
AS A COMPANY



OUR RESPONSIBILITY AS A COMPANY

Respectful, thorough, considerate... OVHcloud is well aware of its duties as an engaged and responsible group. This translates into the creation of a fulfilling work environment, being in control over our development, and paying attention to the effectiveness of our practices and policies.

OUR “ZERO CORRUPTION” POLICY



We’re having none of that!

Corruption is unacceptable, incompatible with the OVHcloud mindset, and therefore forbidden. It not only damages the company, it also harms the communities in which we are growing. Our policy is zero tolerance, with facilitation payments strictly forbidden.

OVHcloud CODE OF ETHICS

OUR RESPONSIBILITY
AS A COMPANY

✓ WE PROMISE TO

- Ensure that our partners, vendors and customers are aware of our policy on corruption.
- Immediately inform our supervisor if someone approaches us or makes a request that could constitute corruption.

✗ WE REFUSE TO

- Make “*facilitation payments*” in order to carry out or speed up certain administrative formalities, like requesting permits.
- Offer, promise or give money or anything else of value to a representative of public authorities, a political party, a union, a charity or a representative of another company (competitor or not), with the aim of giving OVHcloud an unfair advantage.
- Accept or request money or anything else of value that could lead to us failing to honour our obligation of loyalty to OVHcloud, or being seen as influencing a business relationship.

A FEW ANSWERS TO YOUR QUESTIONS...

? *“I’m opening a new office, and the local authorities are demanding a little “tip” in order to install our phone lines. Should I pay?”*

No! We forbid this type of practice. You must refuse the request politely, saying that it goes against OVHcloud policy. Then report it to the Compliance Officer straight away, so that they can determine the best way to proceed.

? *“We are competing in a public tender. I know that my contact loves the US. Can I pay for him to go to New York for a week?”*

No! We forbid any behaviour that could unfairly influence the result of this public tender. Our values must be upheld under all circumstances.



For more information or to report a violation, contact:

the Compliance
Officer

or



HOW WE

COMBAT

MONEY LAUNDERING

AND TERRORIST

FINANCING



Because honesty is the best policy

As a company, it is essential to act in a clear, honest and lawful way, in order to combat money laundering and terrorist financing effectively. For this reason, we promise to provide transparent, accurate and reliable information to our investors and shareholders. We should also ensure that everyone we do business with understands and complies with our commitments.

OVHCLLOUD CODE OF ETHICS

OUR RESPONSIBILITY
AS A COMPANY



WE PROMISE TO

- Demonstrate vigilance, and actively contribute to combatting financial crime such as money laundering, fraud and terrorist financing.
- Provide honest and fair financial reports.
- Implement procedures that enable us to identify our customers (KYC), and ensure compliance with international regulations (embargos, sanctions, etc.).
- Report any suspicious behaviour by anyone we deal with.



WE REFUSE TO

- Fail to apply our procedures.
- Carry out any transactions with suspicious people or organisations.

A FEW ANSWERS TO YOUR QUESTIONS...

? *“I’ve noticed a customer who pays their bills with payment methods registered in different countries. What should I do?”*


Report this customer’s transactions to the Compliance Officer. They will carry out the analyses required to rule out any risks.

? *“I’ve identified a transaction made in a conflict zone subject to international sanctions. How should I act?”*

We need to make sure that the person who made the transaction doesn’t appear in the list of individuals subject to sanctions, and doesn’t contribute to terrorist activities. That means the order cannot be authorised without extensive investigations.



For more information or to report a violation, contact:

your manager _____ or _____	the Compliance Officer _____ or _____	
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SUPPORTING OUR EMPLOYEES



You're in good hands

Our employees are at the heart of OVHcloud and its organisation. To help them thrive, we have built a network of experts in providing professional support to both individuals and groups: Staff Managers, doctor, nurse...

OVHcloud CODE OF ETHICS

OUR RESPONSIBILITY
AS A COMPANY



WE PROMISE TO

- Support all OVHcloud employees in their professional lives, without taking over the manager's role or affecting any aspect related to contracts or assessments.
- Act as an independent third party, and listen considerately while respecting everyone's confidentiality.
- Provide a dedicated medical facility with a doctor and nurse. This is open to any employee at the OVHcloud headquarters.



WE ARE SURE TO

- Guarantee a calm working environment for all of our teams.
- Respect each and every employee's personal choice to use or not use these services.
- Be attentive to signals, however subtle, and offer appropriate support if needed.

A FEW ANSWERS TO YOUR QUESTIONS...

? *“I’ve noticed tensions in my team in the last few days. This is affecting the general atmosphere and level of motivation. What can I do?”*

Your Staff Manager can listen to your issues, and talk through them with you. They will act as a facilitator, working together with both teams and managers to help find solutions.

? *“I’m new to the company, and haven’t yet registered with a doctor. Can OVHcloud help me in this process?”*

In our Roubaix headquarters, we have set up a facility offering medical services. They can definitely perform the role of your GP or primary care physician, and will respect the confidentiality of your consultations.

? *“I have to talk to my team about some sensitive or controversial subjects. Can I get some support?”*

Yes, your Staff Manager or HR Business Partner (HRBP) can help you face this type of situation, and develop new skills. However, it is up to each employee to choose their own approach.

For more information or to report a violation, contact:

your manager	your Staff Manager	your HR Business Partner	
_____ or _____	_____ or _____	_____ or _____	



INTERACTING WITH OUR ECOSYSTEM



Because it's better to play within the rules than to play with the rules!

Customers, partners, vendors, subcontractors, institutions, society... these days, there's no action without interaction. That's why ethical principles should always be present and applied at all levels, supported by open dialogue and transparent communication.

Ovhcloud CODE OF ETHICS

OUR RESPONSIBILITY
AS A COMPANY



WE PROMISE TO

- Create and maintain good relationships with everyone we deal with, based on the principle of open dialogue.
- Be attentive to our vendors' practices and financial dependence on us, without preventing ourselves from collaborating with freelancers or micro-enterprises who are just starting out.
- Respect our commitments, including the principles of data security, confidentiality and freedom of competition against current and future market players.
- Use our position and influence to encourage everyone we deal with to adopt an ever more responsible approach.
- Pursue growth ethically, respecting the values (see our list of values on pages 6-7) that have enabled us to develop and innovate.
- Boost our entire ecosystem by advocating for our industry via projects like the Digital Launch Pad, which supports and guides innovative startups.
- Promote innovation and access to new technologies like cloud computing.



WE REFUSE TO

- Use our position as the European leader in cloud services to prevent our vendors from working with our competitors.
- Confine our customers to our ecosystem.

A FEW ANSWERS TO YOUR QUESTIONS...

? *“I’ve heard that one of our subcontractors was subject to an investigation into forced labour. When I visited the site, I didn’t see anything out of the ordinary. What should I do?”*

In this case, you should contact the Compliance Officer. The subcontractor should be challenged to verify the information. If needed, an audit can be initiated, with the possibility of breaking off the collaboration.

? *“I’ve learned that we are the only customer of one of our vendors. What should I do?”*

We advise you to report this to the purchaser, who can be aware of the situation, and encourage the vendor to seek other customers to diversify their business.

? *“A prospect told me a competitor’s prices. How should I react?”*

It’s simple: we forbid ourselves from using this type of information. You could also gently remind the prospect about confidentiality clauses!

Witnessed an unethical practice?



HOW WE PROTECT THE ENVIRONMENT



Being green means stronger growth!

Innovate, yes, but not if it costs the earth! Our business activity has direct consequences on our environment, and we know that everything we do counts. It is, therefore, our duty to minimise our environmental impact by reducing our carbon footprint and designing more eco-friendly solutions.

OVHCLLOUD CODE OF ETHICS

OUR RESPONSIBILITY
AS A COMPANY

✓ WE PROMISE TO

- Find out, understand and follow the environmental standards in force in each country.
- Follow best practices based on environmental standards.
- Consider environmental aspects in the production, usage and recycling phases of our products.
- Be in control of the lifecycle of our servers, as well as the datacentres that host them.
- Implement a policy that aims to reduce our CO2 emissions.
- Follow a responsible negotiation and purchasing policy, making sure that our vendors comply with our specifications.

✗ WE REFUSE TO

- Downplay our environmental impact, and ignore the negative effects that our core business can cause.

A FEW ANSWERS TO YOUR QUESTIONS...

? *“I work in product recycling, and the bin for computing components is full. Can I use the one for general waste?”*

We are conscious of our environmental impact, and each one of us takes care to respect the environment on a daily basis. That’s why we have separate bins for different sorts of rubbish. If they are full, you should inform your supervisor so that it can be emptied more frequently.

? *“I’ve just joined OVHcloud, and I’d like to use environmentally friendly transport where possible. How can OVHcloud help me?”*

We have set up a system to support the use of environmentally friendly transport: an electrical shuttle, e-bikes, awareness events, etc.



For more information or to report a violation, contact:

your manager	 ROGER
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or

HOW WE PROTECT PERSONAL DATA



We like to laugh, but we take data seriously!

The OVHcloud group has been hosting customer data for nearly 20 years. Our obligation remains the same: it is essential for us to guarantee data integrity, and pay special attention to data protection.

OVHcloud CODE OF ETHICS

OUR RESPONSIBILITY
AS A COMPANY



WE PROMISE TO

- Ensure the integrity, confidentiality and availability of data stored at OVHcloud.
- Supply all information and documentation enabling our customers to act in accordance with applicable data protection regulations.
- Inform and notify our customers and users in the event of any security incidents that could have potential consequences for their personal data.



WE REFUSE TO

- Access customer data for any purpose other than those for which the data has been entrusted to us.
- Transfer information to a third party without prior consent.
- Move data to any country other than those authorised by the customer.

A FEW ANSWERS TO YOUR QUESTIONS...

? *“I’m an administrator for a dedicated infrastructure at OVHcloud. For a maintenance operation, I have to transfer some customer data to a server located in a different country. Can I do this?”*

Before any such operation, it is essential to ensure that the customer has authorised the transfer of their data to the country in question. If not, this data must remain in the primary country.

? *“A customer would like to know which personal data we have about them. What can I give as a reply?”*

This is a legitimate request, and there is a specific procedure for responding to it. To learn about this procedure, simply contact our Data Protection Officer (DPO).

For more information or to report a violation, contact:

your manager _____ or _____	the Data Protection Officer _____ or _____	 ROGER
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HOW WE MANAGE CONFIDENTIALITY



A little gossip could harm your career a lot

All information is precious. Our job is to look after it. That's why disclosing internal information without authorisation could harm the company. Together, we should follow our rules strictly to ensure we protect each and every piece of data.

OVHCLLOUD CODE OF ETHICS

OUR RESPONSIBILITY
AS A COMPANY



WE PROMISE TO

- Circulate the Group's rules on data management, and help keep them up to date.
- Transmit confidential data to a third party only within the framework of a non-disclosure agreement (NDA).
- Ensure that confidential data belonging to our customers or anyone else we do business with is protected, for those of us who have access.
- Store confidential data relating to our stakeholders, customers and vendors in total security, whether in paper or digital format.
- Respect third-party assets (belonging to our vendors, partners and customers), whatever they are: software licence, copyright, etc.



WE REFUSE TO

- Discuss or work on internal matters in a public or private space in which conversations may be overheard, and data security may be compromised.
- Use confidential information for any purpose apart from the purpose for which it was entrusted to us (see also the Information and Communication Code of Conduct).
- Give a vendor information about another vendor.

A FEW ANSWERS TO YOUR QUESTIONS...

? *“My friends often ask me questions about the company, like ‘How does OVHcloud manufacture its servers?’ I would like to avoid doing anything wrong here... What can I say?”*

Feel free to talk about using our solutions. For the rest, limit yourself to public information published on the OVHcloud website and general aspects, to avoid disclosing trade secrets or information that could harm the company.

? *“Can I work on my projects while on the train?”*

Yes, as long as the projects are “*non-sensitive*”, and provided that you have the tools you need to ensure confidentiality, like a privacy filter and VPN. You can find this information in our Information System Security Policy (ISSP).

? *“In the context of submitting a tender with a partner, I’m supposed to share confidential information. What should I do?”*

If we have a non-disclosure agreement (NDA) with this partner, and you use a secure method to transfer the document, you can share relevant confidential information.

? *“I’m with a vendor, and a colleague mentions a project we’re working on with one of their competitors. How should I react?”*

We should be particularly vigilant when dealing with third parties, and even more so when we are subject to a confidentiality agreement (NDA). It is essential to remind your colleague of the confidentiality of the information they mentioned, and make sure that they take more care in future.

For more information or to report a violation, contact:

your manager	the SOC team	
_____ or _____	_____ or _____	



LOYALTY IN OUR DAILY BUSINESS



Making a commitment means respecting that commitment!

Respect is fundamental to everything we do. Encompassing values of tolerance, it applies to everyone, everywhere, without exception. Respect underlies our compliance with laws and regulations. Respect encourages us to assess the loyalty of our daily business.

OVHCLLOUD CODE OF ETHICS

OUR RESPONSIBILITY
AS A COMPANY



WE PROMISE TO

- Foster a positive, collaborative and constructive spirit.
- Fully respect business secrets, and everyone we do business with.
- Act in accordance with the laws and regulations to which we are subject in our various points of presence.
- Communicate transparently.
- Respect fundamental rights: human rights, International Labour Organization (ILO) guidelines, etc.



WE REFUSE TO

- Use our position as the European leader in cloud services to bend the rules and regulations that apply to our industry.
- Take any malicious steps that would put us in a position of corruption, whether actively or passively, in relation to third parties.

A FEW ANSWERS TO YOUR QUESTIONS...

? *“I’ve taken a large order made by a small business. They are worried about the consequences for their cash flow. How should I respond?”*

We are particularly attentive to payment timeframes, and don’t wish to jeopardise the financial security of our vendors. So you can reassure this company that we will respect our commitments.

? *“When launching a new activity, which regulations should I comply with?”*

By default, we commit to complying with local regulations. However, if our Code of Ethics goes beyond local regulations in certain areas, it is essential to comply with our Code of Ethics. We always apply the most demanding regulations in terms of respect for fundamental freedoms.

For more information or to report a violation, contact:

your manager	
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OUR BEST PRACTICES FOR GIFTS AND INVITATIONS



To preserve the joy of exchanging gifts

Exchanging gifts and invitations contributes to mutual understanding, and helps to improve and strengthen business relationships. But it can also lead to conflicts of interest. So we should act in such a way as to preserve only the good aspects of this custom.

OVHCLLOUD CODE OF ETHICS

OUR RESPONSIBILITY
AS A COMPANY



WE PROMISE TO

- Circulate our policy on gifts and invitations before starting any new collaboration, in order to ensure that everyone is informed, both internally and externally.
- Stick to a set maximum amount for gifts and invitations, depending on the country.
- Contact the Compliance Officer if unsure about the amount or purpose of a gift or invitation.
- Demonstrate total transparency by informing a supervisor of any gift or invitation received.
- Systematically assess current practices to ensure that they adhere to our policy, and don't hesitate to contribute to improving the policy if needed.



WE REFUSE TO

- Accept gifts or invitations that clearly exceed the set country-specific amount.
- Accept or give cash or benefits in kind.

A FEW ANSWERS TO YOUR QUESTIONS...

? *“A vendor has just offered me an exclusive 15% discount – personally. Is it right for me to accept it?”*

In this situation, simply contact the Compliance Officer to decide how to proceed.


? *“Can I offer an OVHcloud customer tickets to a sports event?”*

You should check the compliance of your gift with the Compliance Officer and your manager. Getting an exemption may well be possible – but only if you do it like this!

? *“A vendor has just offered me tickets to a cultural event. I know it wasn’t expensive for them. How should I react?”*

You should inform the Compliance Officer. If nothing stands against accepting this gift, all of your colleagues should be able to benefit from it. If there are not enough tickets, perhaps there could be a draw.

For more information or to report a violation, contact:

your manager	the Compliance Officer	 ROGER
_____ or _____	_____ or _____	





OVHCLLOUD CODE OF ETHICS

**OUR RESPONSIBILITY
AS AN EMPLOYER**



OUR

RESPONSIBILITY

AS AN

EMPLOYER

Alert, reactive, impartial... OVHcloud is well aware of its duties as an honest and people-focused group. This translates to taking action against any form of discrimination or harassment, considering the wellbeing of our employees, and respecting our values and principles.

HOW

WE COMBAT

FRAUD



**100% of fraudsters
have tried their luck.
Bad luck!**

Fraud is incompatible with the OVHcloud mindset, because it damages the company and puts it at a disadvantage. Our Security Operations Centre (SOC), which is responsible for information security, continually analyses these risks. Remember, anything provided to our employees should only be used to serve the interests of the company – not harm them.

OVHcloud CODE OF ETHICS

OUR RESPONSIBILITY
AS A COMPANY



WE PROMISE TO

- Be clear and transparent about possible risks of fraud.
- Adopt common measures to deal with the risks of fraud, in order to share them with all employees and thereby comply with OVHcloud requirements.
- Implement and comply with these measures to combat fraud.



WE REFUSE TO

- Get around measures that are in place to combat fraud.
- Try to hide or downplay cases of fraud.
- Limit the definition of fraud to financial matters only.

A FEW ANSWERS TO YOUR QUESTIONS...

? *“I’ve noticed a customer who has 50 servers, but is not being invoiced. Who should I tell?”*

In this situation, you should alert your supervisor. They will be able to investigate this situation.

? *“I’m an accountant, and I’ve received an email with a change of bank account for a vendor. Should I approve it?”*

Before approving it, you should check its legitimacy with the vendor by following the procedure in place. To avoid any risk of fraud, it is essential to discuss it with other members of your team.

? *“I’m a manager in the Support team, and I’ve noticed that one of my advisors regularly refunds one of our customers more than usual. How should I act?”*

You should inform the Compliance Officer, while checking on your side whether the refunds are justified.

For more information or to report a violation, contact:

your manager	the Compliance Officer	the SOC team	
_____ or _____	_____ or _____	_____ or _____	



WHAT WE DO TO PREVENT INSIDER TRADING*



An early warning prevents problems later (like a prison sentence and a massive fine!)

Our employees are free to make whatever personal investments they like, as long as they comply with insider trading regulations. This means that privileged information to which they have access should remain strictly confidential, and not be used for the purposes of personal enrichment.

OVHCLLOUD CODE OF ETHICS

OUR RESPONSIBILITY
AS A COMPANY

✓ WE PROMISE TO

- Make our employees aware that using privileged information in the context of personal investments could fall foul of insider trading legislation.
- Preserve the confidentiality of all privileged information to which we might have access, in order to avoid its accidental disclosure. This includes information about OVHcloud and any other information about our customers, service providers, vendors, partners, etc.

✗ WE REFUSE TO

- Buy or sell shares in any company in which we might have privileged information, in such a way as to constitute insider trading.
- Share privileged information with people who are not supposed to know it.

* Insider trading is when someone buys or sells financial assets, such as stocks and shares, basing their decision on information that is not publicly available.

A FEW ANSWERS TO YOUR QUESTIONS...

? *“I have just learned that OVHcloud is about to acquire a certain company. I think this is the ideal moment to buy shares in this other company, given that its value will definitely rise after the announcement. Is it right for me to do this?”*

No, because this would clearly be insider trading. You would obviously be using privileged information to orient your investment decisions. In this case, you should wait for the official announcement before investing in the Group's newly acquired company.

? *“On account of my position and a call I've just had, I have access to confidential information about another company. I know that in the next few days, the company will announce it is restructuring. That will certainly impact its share price. How should I act?”*

This is another example of what could constitute insider trading. You should be particularly careful to preserve the confidentiality of this information. Obviously, it is not possible to draw any benefit from it whatsoever, even if it is not you personally doing the buying!

Witnessed an unethical practice?



OUR COMMITMENT TO AVOIDING CONFLICTS OF INTEREST*



To stay safely within our ethical boundaries!

As the European leader in cloud services, we are particularly alert to conflicts of interest. Each of us, within our level, should avoid and prevent situations in which our personal interests could clash with those of OVHcloud.

OVHcloud CODE OF ETHICS

OUR RESPONSIBILITY
AS A COMPANY



WE PROMISE TO

- Guard against any situation which could result in a conflict of interest.
- Immediately inform a supervisor in the case of a potential or proven conflict of interest.



WE REFUSE TO

- Create a situation or environment that makes it easy for conflicts of interest to arise.

* Conflict of interest refers to a clash between professional roles and private interests, with the potential to influence the way a person carries out their tasks and cast doubt on their neutrality and impartiality.

A FEW ANSWERS TO YOUR QUESTIONS...

? *“My partner works for one of our competitors. We don’t discuss our daily business at home. Even so, could there be a conflict of interest?”*

It is not a problem in itself, as long as the separation between your private and professional life is respected. You should both be careful not to disclose information in your possession, and protect the confidential data of both companies. To protect yourself, we encourage you to discuss it with your supervisor or HR Business Partner (HRBP).

? *“I would like to co-opt my best friend into OVHcloud. Is that possible?”*

Yes, as long as you follow our official process via the “co-opt” tool in Moov’up, and are not the sole decider.

? *“In addition to my contract with OVHcloud, I have a second job. Do I have the right to do this?”*

Of course! You just have to do this outside of your regular working hours, and not use the access or tools that OVHcloud has provided to you for your second job.

? *“I’ve recently joined the Travel service. I know someone with a hotel in Bordeaux who could offer us competitive rates. Can I book rooms in their hotel?”*

First of all, you need to engage this vendor in a tender or bidding process, and not be involved yourself in the choice of vendor. If someone close to you works for a vendor or a corporate partner, whether it’s current or potential, you should inform your supervisor. They can then take the necessary measures to avoid putting you in a tricky situation.

For more information or to report a violation, contact:

your manager	or	your HR Business Partner	or	 ROGER
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HOW WE COMBAT HARASSMENT



#ZeroTolerance

Everyone has the right to be treated with respect and dignity. At OVHcloud, this principle is fundamental to the way we work.

OVHcloud CODE OF ETHICS

OUR RESPONSIBILITY
AS A COMPANY



WE PROMISE TO

- Support and promote OVHcloud's commitment to keeping a workplace free from any form of moral and sexual harassment.
- Guarantee the confidentiality of communications, and the anonymity of those who report a violation.
- Communicate in a people-centred environment where diversity stimulates our activity.
- Treat any report of harassment seriously, and with good judgement. We should respond personally to those who report harassment within a reasonable timeframe.



WE REFUSE TO

- Turn a blind eye, and ignore any situations that could lead to harassment or other mistreatment of our employees.
- Show bias in how we handle reports.

A FEW ANSWERS TO YOUR QUESTIONS...

? *“My relationship with my manager is difficult. Our discussions are tense, and this affects my personal life. What can I do?”*

Firstly, don’t hesitate to approach your Staff Manager or HR Business Partner (HRBP) with the aim of improving this situation. If it gets worse and starts feeling like harassment, you can use the ROGER reporting platform, or approach the Compliance Officer.

? *“One of my close work contacts outside of OVHcloud is quite touchy-feely with me; he makes comments about my figure. What attitude should I take towards this person?”*

OVHcloud will not tolerate this type of situation. Report this incident to your manager and to the Compliance Officer, so that they can intervene directly with the other person’s supervisor. They can potentially take any action necessary to put a stop to this, including cancelling the relationship with the other company.

? *“I keep getting pushy messages from a colleague via our instant messaging tool. It makes me feel uncomfortable, and it just carries on. What can I do to stop this?”*

You need to report this behaviour. As well as the Staff Manager, HRBP and your own manager, the ROGER platform is available for you to do this. You can even report it anonymously to avoid any conflict. The Compliance Officer can then communicate with you securely and confidentially via the integrated messaging system.

For more information or to report a violation, contact:

your manager	or	your Staff Manager	or	your HR Business Partner	or	the Compliance Officer	or	
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RESPECTING DIVERSITY AND COMBATTING DISCRIMINATION



OVHcloud welcomes diversity: Linux, Windows, VMware...

Team spirit, fairness and sharing are three values that are fundamental to OVHcloud. They are shared with all new employees right from the start, during their integration programme. Every day, we are sure to respect gender equality, encourage diversity, and make it easier for workers with disabilities to join us.

OVHcloud CODE OF ETHICS

OUR RESPONSIBILITY
AS A COMPANY



WE PROMISE TO

- Communicate in a people-centred environment, where respect and diversity flourish.
- Select and support our employees by considering only their skills.
- Make sure that our vendors, partners and customers are aware of our policy regarding diversity, and also commit to this approach.



WE REFUSE TO

- Practise any form of discrimination or harassment related to a person's gender, disability, family situation, political involvement, religious faith, sexual preferences, union activities or ethnic origins.

A FEW ANSWERS TO YOUR QUESTIONS...

? *“I’ve identified a skilled applicant with a physical disability. Will that make it more complicated to hire them?”*

OVHcloud hires solely on the basis of skill, and commits to doing anything it can to support each and every employee within the organisation. It is the manager’s role to determine an employee’s expectations, and work with the HR Business Partner (HRBP) and/or Chief Happiness Officer to provide an appropriate response.

? *“I’m going to be supervising an international team, but I don’t know how to manage the multicultural aspect. Can OVHcloud help me in this situation?”*

Although it is important to integrate cultural differences day to day, these shouldn’t clash with our values, or jeopardise the harmony of everyone working together within the company. Your HRBP is there to help you approach this situation.

? *“I’m online with a customer who keeps making racist comments; this makes me really uncomfortable. What attitude should I take?”*

This type of behaviour is unacceptable, and OVHcloud does not tolerate it. You should inform your manager of the discussion, and take any steps necessary to politely end the communication. An internal process will be initiated, to avoid such a situation happening again.

For more information or to report a violation, contact:

your manager	your HR Business Partner the Chief	Happiness Officer	
_____ or _____	_____ or _____	_____ or _____	



HEALTH, SAFETY AND QUALITY OF WORK LIFE



A healthy mindset in a healthy workplace

We know how important it is to make our workplaces safe and healthy for everyone on our sites. Because of this, we invest in everyone's safety and wellbeing via dedicated teams that have been put together specifically to deal with these issues.

OVHCLOUD CODE OF ETHICS

OUR RESPONSIBILITY
AS A COMPANY



WE PROMISE TO

- Maintain a safe, healthy workplace environment, ensuring that everyone is aware of emergency procedures and that our actions do not lead to any risk for ourselves or others.
- Report to a supervisor regarding any behaviour, equipment or situations with the potential to cause an accident.



WE ARE SURE TO

- Raise awareness of, and adhere to, guidelines relating to hygiene, safety and workplace conditions. Each new employee is made aware of this during their integration programme.
- Support all employees in their professional development, with personal attention from experts in their fields (see also “Supporting our employees” on page 22).

A FEW ANSWERS TO YOUR QUESTIONS...

? *“One of our service providers is asking if they can use an OVHcloud forklift truck. Can I accept their request?”*

We cannot run any risks, either to OVHcloud or to the service provider. Before accepting their request, speak to the Security service. They will check the required permits, and ensure the procedure for loaning such equipment is properly followed.

? *“One of my colleagues seems really stressed at the moment. I’ve tried to talk to them about it a few times, but without any success. What’s the best way to help them?”*

In this type of situation, it may be necessary to remind your colleague that they can speak to a Staff Manager. Thanks to their deep understanding of psychology in the workplace, they can take on the role of an independent third party who can support employees personally and confidentially.

? *“I’m in a team meeting, and one of my colleagues doesn’t feel well; he says he feels dizzy. How should I react?”*

We have Occupational First Aiders (OFA) in all of our sites. Contact them in any emergency situations. These employees are an essential part of the first aid system at OVHcloud.

? *“I’m new to OVHcloud, and I need daily care from medical staff. What kind of system is in place at the moment?”*

In our Roubaix headquarters, there is a medical facility with a doctor and a nurse. These two professionals are both authorised to provide medical care. Feel free to approach them for personal guidance.

For more information or to report a violation, contact:

your manager	your Staff Manager	the Chief Happiness Officer	the Security service	the OFA	
or	or	or	or	or	



RESPECTING

PRIVATE LIFE



“That’s not our business...”

In all our policies, we place special emphasis on respecting the private lives of our employees. Faithful to our values of innovation, we also recognise their right to be entrepreneurs.



WE PROMISE TO

- Circulate and enforce a detailed IT Code of Conduct that takes into account the private lives of our employees.
- Respect all personal commitments: associations, political parties, unions, etc.
- Encourage innovation, the freedom to create, and the spirit of individual entrepreneurship (e.g. filing patents).
- Respect time for resting between two working days.



WE REFUSE TO

- Create a situation that impacts negatively upon our employees’ personal lives.
- (Mis)use IT tools for something other than their original purpose.

A FEW ANSWERS TO YOUR QUESTIONS...

? *“I’m a telephone support adviser. Do I have the right to start my own activity as a webmaster?”*

Yes, we recognise and encourage entrepreneurship. However, this initiative should not interfere with your work at OVHcloud.

? *“For personal reasons, I have to return to the region where I came from. Can OVHcloud support me in this?”*

We have a geographical Mobility service that can answer these issues individually.

? *“It’s 11pm, I’m a manager and I want to send an important (but not urgent) email to my team. Can I send it right away, so I don’t forget to do it later?”*

We discourage non-urgent communications outside of regular working hours. In this particular case, we advise that you write your message and send it the next day.



For more information or to report a violation, contact:

your manager	your Staff Manager	your HR Business Partner	 ROGER
_____ or _____	_____ or _____	_____ or _____	

PROTECTING

OUR ASSETS



Assets are our friends, we need to treat them well!

An asset is something that has potential or real value for an organisation. It could be physical (“tangible”), like our servers, or non-physical (“intangible”), such as our customer data. OVHcloud holds a large amount of sensitive data, infrastructures and intellectual resources. These are our great strength, and it’s therefore vital to protect them.

OVHcloud CODE OF ETHICS

OUR RESPONSIBILITY
AS A COMPANY



WE PROMISE TO

- Ensure the protection of intellectual property and all assets of the OVHcloud Group, whether physical, technological or financial.
- Circulate and keep in mind all corporate assets and documents belonging to the Group.
- Create an environment that fosters innovation, and take sufficient legal measures to protect it.
- Protect all of our directors via appropriate procedures according to their involvement.



WE REFUSE TO

- Make inappropriate use of IT systems and tools available in a professional context.
- Tolerate behaviour that demonstrates a lack of respect for the physical assets provided.

A FEW ANSWERS TO YOUR QUESTIONS...

? *“I’m at an event, and a journalist takes me aside, asking me questions about OVHcloud. How should I react?”*

Any information leaks can jeopardise the brand, and have a direct impact on the company. You should contact the Communication service for guidance in this sort of situation.

? *“I’m on a business trip, and I’ve left my work laptop on the plane. Who should I tell?”*

If you lose a physical asset, you should contact the Security Operations Centre (SOC). They will then take all the necessary measures to preserve the confidentiality and security of our information systems.



For more information or to report a violation, contact:

your manager	the Communications service	the SOC team	
or	or	or	

SHARING

OUR VALUES



Because with great power comes great responsibility!

When speaking publicly, OVHcloud employees convey the Group's values. We encourage them to share their passion for their profession in their daily life and on social media, while demonstrating a professional and respectful attitude.

OVHcloud CODE OF ETHICS

OUR RESPONSIBILITY
AS A COMPANY



WE ENCOURAGE YOU TO

- Act as ambassadors of OVHcloud in everything we say and do.
- Promote the company's values in our language and behaviour.
- Communicate around our area of expertise in social media (see also the social media policy) and at work-related meetings or events.



WE ARE SURE TO

- Identify ourselves as OVHcloud employees both online and in real life, to share our passion for our work with total transparency.
- Demonstrate a faultless professional attitude, and respect the people we deal with under all circumstances.
- Express our opinions on subjects we know about, without making any commitments on behalf of the company.
- Use the means of communication provided to us (messaging service, email, headed paper, etc.) only as part of our professional correspondence.

A FEW ANSWERS TO YOUR QUESTIONS...


? *“I’m taking part in a work-related event with my team. One of my colleagues is behaving really inappropriately, making rude remarks and being generally aggressive. How should I react?”*

This type of behaviour is unacceptable. We should act respectfully and demonstrate good judgement in all circumstances. It is your duty to remind your colleague of this. If the situation gets worse, contact the Compliance Officer.

? *“I read a blog by a colleague expressing their dissatisfaction with OVHcloudcloud without mentioning that they are an employee. Should I report it?”*

Everyone is free to express themselves on the internet. However, it is important to be aware of the impact of online statements, because OVHcloud could suffer as a result. We advise that you talk to your colleague, so that they understand the consequences of their actions. If nothing changes, you can contact the Compliance Officer.

For more information or to report a violation, contact:

your manager _____ or _____	the Compliance Officer _____ or _____	 ROGER
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PARTNERSHIPS, PHILANTHROPY AND SPONSORSHIP



Seeking a special company for a special partnership!

More than just a company, OVHcloud is a group of citizens, who are socially responsible and engaged. We also encourage our employees to play an active role in supporting the community.

OVHcloud CODE OF ETHICS

OUR RESPONSIBILITY
AS A COMPANY



WE PROMISE TO

- Draw a clear, practical line between activities of philanthropy and those of sponsorship.
- Only select our partners if they adhere to our values, and our ethical principles.



WE REFUSE TO

- Commit OVHcloud to doing things that go against its values.
- Oblige employees or any other partner of the Group to contribute to gifts or philanthropic funds supported by OVHcloud.

A FEW ANSWERS TO YOUR QUESTIONS...

? *“I’m a volunteer in an association, and we’re launching our annual campaign for donations. Can OVHcloud give us money?”*

We are happy to be involved in good causes that are in line with our values. Any request for a donation (physical or financial) should include a file that will enable us to better understand the causes and projects that the association supports. OVHcloud’s ethics committee will then consider the application.

? *“I’m an employee of the Group, and I’m also president of a sports club. We’re planning to organise a tournament, and we would like help financing this event. Can I submit a request to OVHcloud?”*

We wish to encourage our employees to get involved in associations. Sponsoring is a way to communicate externally; it allows us to promote our company, and convey our values. Any such request should be made in the form of an application backed up by justifications. This application will then be considered.

For more information or to report a violation, contact:

your manager	the Ethics Committee	 ROGER
or	or	



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