

# CODE OF BUSINESS CONDUCT

A white play button icon with a small 'TM' trademark symbol at its base.

**IF WE** ask the right questions  
we can change the world.

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## **MESSAGE FROM THE VICE-CHAIRMAN OF THE BOARD OF DIRECTORS AND CHIEF EXECUTIVE OFFICER**

### **INTEGRITY IS NON-NEGOTIABLE**

Compliance with ethical rules and international standards is an integral part of the purpose of Dassault Systèmes, to “imagine sustainable innovations capable of harmonizing product, nature and life”. There is no harmony, nor sustainability without good ethics.

These ethical principles must guide our corporate conduct and are key to our role and reputation as a strategic partner to our customers.

Dassault Systèmes is a long-term focused company that has always sought to build enduring relationships of trust with its stakeholders - its employees, customers, partners, suppliers, shareholders and government/regulatory bodies.

For Dassault Systèmes, the pursuit of ethical and sustainable growth is fundamental and one of the pillars of the company’s corporate responsibility policy deeply rooted in our values.

Acting with integrity means making the right choices and adopting the highest standards of conduct. Each of us must be exemplary, engaging on both an individual and collective level inside our company as well as in our relationships with all stakeholders.

Dassault Systèmes therefore expects its employees to act in accordance with the highest ethical standards, especially in terms of integrity, collaboration and mutual respect. We also expect our partners to adhere to the same principles.

We all need a high quality work environment to fulfill our vision. Having a comprehensive Code of Business Conduct enables us to act and behave according to our values and to the ethical standards and laws that apply in all countries in which we operate.

I’m counting on you.

**Bernard Charlès**  
**Vice Chairman of the Board  
and Chief Executive Officer**

# PRINCIPLES OF THE CODE OF BUSINESS CONDUCT

Ethical practices and compliance with applicable international standards are at the core of Dassault Systèmes (“3DS” or the “Company”) business conduct and form the basis of our well-established reputation as a strategic player in the field of technological, industrial and economic innovation.

3DS complies with local regulations and laws, as well as international standards, such as the International Charter of Human Rights, the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work, OECD Guidelines for Multinational Enterprises and the United Nations Convention on Children’s Rights. Dassault Systèmes therefore strictly prohibits child labor and any form of forced labor, servitude or modern slavery.

The Company is committed to protecting basic freedoms and promoting diversity within a multicultural organization.

This Code applies to all 3DS employees, irrespective of their function or position. It supplements, but does not replace, local or international laws, regulations and obligations, together with generally accepted standards of business conduct (the “regulations”). In cases where regulations require standards that are higher or in addition to those set out in the Code, these regulations must apply. Conversely, if the Code sets out higher standards, the Code prevails over local regulations. In the event of incompatibility, however, local regulations prevail over this Code.

Finally, although this Code provides an overview of the Company’s policies and procedures, it cannot describe all situations in which 3DS employees might experience and implement our professional ethics. The Ethics and Compliance Department is available to help you understand the applicable rules and provide advice and assistance whenever required.

## Question

What should I do if the legal provisions in the country where I am working differ from those in this Code?

## Answer

The best approach is to comply with the strictest requirement. If you’re not sure which is the strictest requirement between the Code and local law, please consult the Ethics and Compliance Department at the following address:

[people.ethicscommittee@3ds.com](mailto:people.ethicscommittee@3ds.com)

**3DSone-oneConduct** is the 3DS dashboard dedicated to Ethics, Compliance and Security topics. 3DS policies related to the Code of Business Conduct are located there.

## ASKING THE RIGHT QUESTIONS

3DS commits to ensuring its activities are performed according to the highest level of integrity.

As such, all our employees and partners must comply with the laws, rules and regulations in force in the countries where 3DS operates and behave according to the strictest ethical standards.



# SOCIAL AND ENVIRONMENTAL COMMITMENT

## MUTUAL RESPECT AND DIVERSITY

Our corporate culture is based on a shared ambition, our purpose and the unique, shared values within our ecosystem.

This offers a workspace that is conducive to personal achievement, enabling the mutual enhancement of knowledge and promoting growth through change in a collective, fulfilling environment.

3DS considers diversity as an asset that encourages creativity and mutual enrichment.

We are committed to providing a working environment without any form of discrimination, harassment or intimidation, and we must treat our colleagues, customers and partners with respect in all circumstances.

Recruitment, training, promotion, appointment and other work-related decisions are based on the qualifications, talent and performance of each employee, as well as on our professional motivations.

All our human resources practices comply with local and national legislation in the countries where we operate, as well as with international standards.

3DS strictly prohibits moral harassment, sexual harassment and discrimination in work relations for whatever reason, in particular during the recruitment process and during employment.

Situations that may involve harassment or discrimination are assessed on a case-by-case basis, as established by specific facts and circumstances and according to their legal qualification.

## DEFINITIONS

**Sexual harassment** is defined as a situation in which unwelcome behavior with sexual overtones, being expressed physically, verbally or non-verbally, occurs with the aim or the effect of compromising the dignity of a person and, in particular, creating an intimidating, hostile, degrading, humiliating or offensive environment.

**Discrimination** refers to a situation in which a person is treated differently and negatively, without objective justification, due to or in relation to their age, handicap, gender, marital status or pregnancy, ethnic origin, national origin, social origin, religion, sexual orientation, union membership, opinion or political affiliation.

### Question

My boss has made malicious comments on several occasions about the work of a colleague. Is this harassment?

### Answer

You are entitled to work in an environment that is free from intimidating, hostile or offensive behavior. However, not all critical remarks constitute harassment. If you feel uncomfortable about a situation, you can contact your Human Resources Manager or write to [people.ethicscommittee@3ds.com](mailto:people.ethicscommittee@3ds.com) for help.



## A SAFE AND HEALTHY WORKING ENVIRONMENT

A safe environment is necessary for everyone to perform their tasks. Consequently, we count on the attention of all employees to ensure their own security and that of their colleagues in a responsible manner. 3DS complies with applicable legislation and regulations in terms of health and safety. We make sure any accidents, harm, dangerous equipment, violence or other threats to safety are rapidly reported. Our partners are obliged to act likewise.

Alcohol, together with illicit and regulated substances, can adversely affect safety and productivity, as well as having a negative impact on behavior, reliability and judgement. Except for legal, moderate consumption of alcohol during authorized professional events at work, employees are prohibited from consuming or being under the influence of alcohol, and possessing, distributing or being under the influence of illicit substances.

Firearms are prohibited on 3DS sites and in 3DS buildings. No conduct that creates a hostile, violent or intimidating working environment will be tolerated at 3DS.

## RESPECT FOR THE ENVIRONMENT

Sustainable development is at the core of Dassault Systèmes' purpose to provide professionals and the public with *"3DEXPERIENCE® universes to imagine sustainable innovations capable of harmonizing product, nature and life"*. With this in mind, we endeavor to put protection of the environment at the center of all our operations.

3DS also endeavors to minimize the impact of its own activities on the environment. We apply the precautionary principle in relation to environmental issues. We comply with legislation and regulations applying to the protection of the environment, including the necessary measures to manage environmental risks.

3DS considers that the daily actions of each person play a crucial role in contributing to 3DS progress in this area. Commitments to protect the environment are embodied in its Corporate Social Responsibility Principles, available on the **3DEXPERIENCE** platform, in **3DSone-oneConduct**.





## ETHICAL BUSINESS CONDUCT

Our integrity and ethical conduct are fundamental to the internal and external operations of the Company wherever we operate.

Our long-term relationships with our customers, suppliers and partners are based on the honesty and integrity that all 3DS employees show at all times.

We expect our suppliers and partners to act similarly.





## FIGHTING CORRUPTION

3DS has a zero tolerance policy with respect to corruption and influence-peddling, including bribes and facilitation payments, regardless of local customs or commercial pressure and even if this means losing out on business opportunities.

Consequently, 3DS employees must remain vigilant, comply with laws and regulations in force and never, whether directly or indirectly, encourage, offer, attempt to offer, allow, promise or accept, in any form, any advantage (e.g. payment, gift, bribe or illegal commission) in order to obtain or retain a contract or gain an inappropriate advantage, even if they believe they are acting in the best interest of 3DS.

Breaching anti-corruption laws and regulations, including the French Penal Code and the Sapin 2 law in France, the FCPA anti-corruption law in the USA and the UK Bribery Act, can result in severe sanctions, both for the individuals and legal entities they represent. These sanctions can include heavy fines and prison sentences, in addition to harm to the reputation of the company and commercial losses. The consequences of corruption are even more serious when public officials are involved.

For more information on this subject, 3DS employees are encouraged to carefully read and comply with the Anti-corruption policy and recommendations relating to interactions with 3DS intermediaries, available on **3DEXPERIENCE** platform, in **3DSone - oneConduct**.

### Question

A customer's employee has asked me if I can find an internship in our company for his daughter. He said this could be "beneficial" for me.

### Answer

Do not accept. "beneficial" suggests that he may intend to commit an improper action in exchange for a favor (helping his daughter find a work placement in the company). If you encounter this type of situation, the best solution is to refer the person (whether a public official or not) to the 3DS Human Resources Department, which will be able to provide them with information on the company's work placement schemes, to enable his daughter to apply and to ensure her application is treated identically to those of all other applicants. Any additional action could be perceived as a bribe.

## DEFINITIONS

**Corruption** means a situation in which something of value is promised, given or allowed to be given improperly, directly or indirectly to a public official or a person from the private sector, with the aim of obtaining an undue advantage by inciting this person to perform or not to perform an action as part of their duties. The person giving and the person receiving the undue advantage are both liable for their act of corruption.

Corruption also includes **influence-peddling**, which involves offering a person an undue advantage, with the aim of obtaining special treatment, a job, contract or any other favorable decision from an authority or body, through the influence or relations of this person.

The words "something of value" and "advantage" are interpreted in the broadest terms in the context of corruption. Many people might think that a bribe is a direct payment in exchange for a commercial advantage, yet it may also involve a less direct transaction. A bribe can take the form of a donation to a charity, sponsorship or an activity such as a seminar, contribution to a social fund, a gift or a sign of hospitality, such as paying for a meal or travel expenses.

### Question

Corruption of public officials is severely punished in many countries and needs to be considered as a specific risk.

What is a public official?

### Answer

A public official is any civil servant or employee of a government, national or international public organization or of a department or body that depends on the above, or any person acting in an official capacity. This title covers the civil servants or elected representatives of executive, legal or parliamentary branches or the employees of an entity directed or controlled by a State, such as a public service company or a university. We need to be particularly vigilant in our exchanges with public officials to avoid any situation of conflict of interest, whether perceived or real.



### THIRD-PARTY RELATIONS

Under anti-corruption legislation in force, 3DS may be liable in cases of faults committed not only by its employees, but also by third parties. Consequently, 3DS employees must remain vigilant when performing their duties to avoid the Company being directly or indirectly involved in acts of corruption. 3DS counts on its suppliers, partners, distributors, agents, consultants and all third parties to adopt ethical behavior in their interactions with or on behalf of 3DS. These third parties are obliged to comply with the principles set out in this Code, together with the contractual clauses that bind them to 3DS.

In order to comply with its obligations under international anti-corruption legislation, 3DS must perform prior verifications on any third parties with which it becomes involved. Prior verifications are important tools for managing risks, which help companies to detect and mitigate any indications of alerts and risks that a third party may present.

3DS must therefore perform due diligence on third parties presenting the highest risks before contracts are entered into. Although checks performed during prior verifications may vary according to the category of third party involved, they must pursue the following objectives:

- identify the ultimate shareholders of the third party;
- establish the qualifications of the third party and those connected to it, including the reputation of the Company and any link with public officials;
- establish the commercial justification that would lead to this third party being selected, including the type of services to be provided;
- guarantee appropriate payment methods (for example, no acceptance of payment in cash or to several accounts or to a country other than that in which the third party conducts its business)
- spot alerts and mitigate risks; and
- obtain approval from the Ethics and Compliance Department wherever necessary.

#### Question

A potential government-owned client (therefore considered to be a “public official”) has told me it cannot buy software licenses directly from 3DS because 3DS is not one of its accredited suppliers. It has suggested that the transaction be performed through a listed distributor that it frequently uses.

What should I do?

#### Answer

This situation does not in itself constitute a reason not to continue with the transaction, but it does require additional verification under the 3DS verification procedure. You should therefore forward all the information you have to your management and the Ethics and Compliance Department to avoid any conflict of interest or other similar risks.

Similarly, the proposal to appoint a distributor or agent late in an ongoing commercial process constitutes an alert that requires informing the Ethics and Compliance Department in order to perform an additional assessment.



## GIFTS AND INVITATIONS

The exchange of gifts, meals and entertainment between companies and customers, partners or suppliers is common practice. This remains acceptable, providing the exchange of courtesies involves reasonable amounts.

The 3DS Anti-corruption policy provides further details on this practice and sets the specific amounts that cannot be exceeded without authorization. It also sets out the validation procedure to be followed according to the various types of gifts and hospitality.

Under this Anti-corruption policy, the offering and acceptance of gifts and invitations must:

- Be compatible with local practice and customs and comply with applicable legislation;
- Involve reasonable amounts, be appropriate and not include anything that may embarrass 3DS if revealed publicly (for example, it is strictly prohibited to offer or receive entertainment such as gambling or “adult entertainment”);
- Comply with the policies applying both to the person offering and the person receiving. Many large corporations and government and public entities forbid their employees from accepting any gratification, including meals and entertainment;
- Be correctly documented and recorded in the Company’s accounts. For example, entertainment-related expenditure must be entered under “Hospitality expenses” and not under “Training expenses”.

Before accepting or offering gifts or hospitality of a value that exceeds the amount set in the 3DS Anti-corruption policy, employees must fill in and submit a declaration of gifts and invitations for approval, in accordance with the procedure set out in the documents available on the **3DEXPERIENCE** platform, on [3DSone oneConduct Gift/Hospitality request form](#).

## DONATIONS, SPONSORSHIP, PATRONAGE AND POLITICAL CONTRIBUTIONS

Donations and sponsorship are occasions for 3DS to contribute to charitable or humanitarian projects, to support cultural or sports activities and projects and to promote educational institutions, as well as the Company’s values. Membership in business associations is also a chance for 3DS to support local organizations in relation to its business objectives.

However, these types of contributions and memberships may be used to hide acts of corruption. Consequently, donations, charitable contributions, corporate sponsorship and memberships are subject to special verifications and precautions to ensure these actions do not involve corruption.

3DS participation in donations, patronage and sponsorship must comply with applicable law in the countries involved and be completely transparent. Furthermore, these actions must comply with 3DS values, priorities and communication strategy, as well as being the subject of a written contract approved by the Legal Department.

The Dassault Systèmes Foundation provides a secure framework for skill sponsoring patronage.

3DS does not make any political contributions or provide any benefits to promote and support any specific political party or public official. All 3DS employees are forbidden from using 3DS resources to procure any benefit for political parties or public officials.

### Question

I have received a gift from a customer and I know that I can’t accept it. What should I do?

### Answer

Return the gift to the customer and politely explain our policy. If you cannot return a gift because it is perishable, such as flowers or a food hamper, put it in a communal area where everyone can enjoy it.

## CONFLICTS OF INTEREST

3DS employees must adopt exemplary behavior and act in the best interests of the Company. A conflict of interests, whether perceived or real, occurs when the capacity of an employee to make choices, recommendations or decisions or to act objectively with respect to 3DS interests, may be influenced by a personal interest. This could be due to the fact that the employee, a close relative or friend could personally benefit from the 3DS business relationship with a third party.

**Examples of situations that may lead to a conflict of interest include:**

- Making decisions or recommendations based on external interests that go against the best interest of 3DS, or an employee taking advantage of their position within 3DS to hire a relative or friend, without notifying their management and Human Resources of the potential conflict of interest;
- Joining the Board or acting as a consultant for a competitor, partner, customer or supplier;
- An employee personally benefiting from their position within 3DS, for example, having a direct or indirect business interest in a company with which 3DS does or is considering doing business (such as a supplier, distributor, consultant or acquisition target).

If an employee discovers a potential conflict of interest, they must notify their manager, the Legal Department or the Ethics and Compliance Department by writing to [people.ethicscommittee@3ds.com](mailto:people.ethicscommittee@3ds.com).

The Human Resources Department can also provide additional advice to 3DS employees and help them establish whether a situation could lead to a conflict of interest.

To avoid embarrassing situations, 3DS employees must notify their management and Human Resources of any prior or future external commitments, or any personal or professional relationship that may interfere with their obligations to 3DS and create a perceived or real conflict of interest.

For more information on this subject, 3DS employees are encouraged to carefully read “Recommendations on 3DS conflicts of interest”, available on **3DEXPERIENCE** platform, in **3DSone - oneConduct**.

### Question

Can you give an example of a conflict of interest?

### Answer

Your brother-in-law has a company that is about to be considered as a new 3DS distributor. You are part of the decision chain approving this new distributor.

In this case, you must disclose the potential conflict of interest to your manager and the Human Resources Department and withdraw from the approval process.



## INSIDER TRADING

3DS shares are listed on the Paris stock exchange. Under applicable law, any person holding important confidential information concerning a listed company that may influence the price of shares issued by this company ("insider information") must not disclose this insider information or purchase or sell company shares for as long as the information in question has not been made public.

Any person who fails to do this may be guilty of insider trading.

In such a situation, a person may be found guilty of insider trading, even if:

- They obtained the insider information unintentionally (for example, information was passed on by another employee);
- They make no profit on an operation involving insider information; or
- The insider information is communicated to a third party, which then performs an operation involving the purchase or sale of listed shares.

3DS complies with legislation with respect to insider trading. Consequently, to avoid insider trading, 3DS employees must not:

- Purchase or sell the shares of 3DS or of a customer, partner company or any other listed company when they have insider information on this company;
- Disclose insider information, including accidentally, to any person (close relation, friend, family member or partner).

Severe sanctions apply to perpetrators of insider trading.

### Examples of insider information:

- Financial reports, announcements on dividends and profits that have not yet been made public
- Income forecasts
- Ongoing negotiations with key customers and partners
- Important operations, such as mergers and acquisitions
- Changes in strategy
- Important investments, both nationally and abroad
- The financial consequences of any losses relating to an incident.

For more information on this subject, employees are encouraged to carefully read "3DS Insider Trading rules", available on **3DEXPERIENCE** platform, in **3DSone - oneConduct**.

### Question

If I gain knowledge of 3DS quarterly financial results before they are announced publicly, am I allowed to purchase 3DS shares prior to this publication?

### Answer

No. As this information is deemed to be "important confidential information", the purchase of 3DS shares would breach 3DS policy and may be considered insider trading.





## FINANCIAL RECORDS

As it is listed on the Paris stock exchange, 3DS must comply with strict rules and principles regarding accounting and financial information. It is essential that 3DS employees ensure all operations are correctly identified, analyzed and recorded in the Company's accounts, in compliance both with generally accepted accounting standards and internal rules and procedures. Any infringements of accounting and financial laws may lead to civil and criminal proceedings being brought against 3DS and its executive management.

All 3DS employees are responsible for ensuring sound accounting practices and proper financial records, including those who do not directly participate in preparing the Company's accounting and financial reports. Most employees will gain knowledge of certain types of financial documents or operations within the context of their employment at 3DS. Keeping proper financial records involves keeping documents such as receipts, invoices and expense claims.

### Important:

- We do not tolerate any intentional false statements concerning our financial records, including any attempt to deliberately create incorrect or misleading records for any reason, or to hide the true nature of an operation.
- We do not help any party carry out such wrongdoing or provide misleading financial information.
- We do not pay any bribes or use 3DS funds or assets for this purpose or for any other similar act of corruption.
- We reserve the right to immediately report any situation generating incorrect financial and accounting information, in accordance with the 3DS

whistleblowing procedure.

Our internal controls must ensure the thoroughness, reliability, accuracy, timely transmission and clarity of our financial reports, in order to keep the trust of our shareholders, customers, partners and employees. If the Company is subject to an enquiry or inspection, we will respond openly to questions and continue to be honest and transparent in our exchanges with the authorities.

### Question

I don't work in the Finance or Accounting Departments.

Am I responsible for "financial integrity"?

### Answer

Yes. The accuracy of records is not the responsibility of a single team or Department. Instead, it is a responsibility that we all share. Whether it relates to expense claims or invoices, all our daily operations must be true, accurate and correctly recorded.



## COMPLIANCE WITH COMPETITION LAW

Competition law is designed to protect and encourage competition between economic players. The rules of competition law prohibit unfair business practices as well as sharing commercially sensitive or strategic information with competitors. Failure to comply with applicable competition rules could expose 3DS, its directors and employees to administrative and criminal sanctions, as well as heavy fines and damage to the reputation of 3DS.

3DS policy imposes strict compliance with national and supranational rules regarding competition law in all countries in which we operate. 3DS is vigorously competing on its markets.

3DS interacts with its suppliers, customers and distributors in compliance with all applicable competition rules. For more information on this subject, 3DS employees are encouraged to read the Policy on 3DS compliance with competition law available on **3DEXPERIENCE** platform, in **3DSone - oneConduct**.

### 3DS employees must ensure they:

- Avoid discussing certain subjects, such as prices and the issues involved in setting prices (for example, actual prices, discounts, rebates and calculation methods), pricing strategies, planned changes to prices (increases and decreases), marketing plans and our commercial terms, with our competitors;
- Refuse to enter into agreements with competitors concerning prices, customers and sales territories,
- Defend 3DS interests as best they can and treat distributors fairly.

### Question

What should I do if a competitor or one of its employees or representatives (for example, through a business association) directly or indirectly brings up a sensitive business issue and/or gives me sensitive information regarding prices (orally or in writing)?

### Answer

- Immediately end the conversation (do not accept any documents).
- Specify that 3DS policy imposes compliance with competition law.
- If the discussion continues, leave the meeting immediately (if possible, ensuring your objections and departure are recorded in the minutes).
- Do not share any commercially sensitive information internally.
- Immediately notify your Legal Department.

## EXPORT CONTROLS

3DS endeavors to strictly comply with all applicable laws and regulations relating to trade and export controls.

Rigorous 3DS procedures aim to ensure that the Company conducts its business, grants licenses for its products and supplies technology solely in compliance with applicable rules relating to trade, sanctions and embargoes. This specially includes the legislation of the United States and the European Union. 3DS employees must comply with the internal rules and procedures implemented within 3DS to ensure compliance with laws and regulations applying to the control of trade and exports.

For example, all 3DS products and solutions are given an ECCN (Export Control Classification Number) and end users are systematically controlled to verify export restrictions, including when transactions are conducted through a distributor.

For more information on this subject, 3DS employees are encouraged to read the rules on the 3D Dashboard [Export Compliance @3DS](#) or contact the Export Control Department :

[3ds.compliance-export@3ds.com](mailto:3ds.compliance-export@3ds.com)

### Question

Do Export Control regulations apply to areas other than Sales at 3DS?

### Answer

Yes, not only is 3DS obliged to ensure its software license sales comply with these regulations, but we must also ensure that the customer data provided to us through our Support and Services activities is protected according to the same criteria, namely the citizenship and location of employees that access the data.





## PROTECTION OF PERSONAL DATA

3DS has always recognized the importance of protecting personal data in the digital era and is fully aware of its responsibilities when processing personal data.

3DS complies with applicable legal requirements, including the General Data Protection Regulation (GDPR), both for its internal needs and for the needs of all its partners, including:

- Ensuring compliance with GDPR requirements within its organization such as Human Resources (personal data policies), Finance, Legal, Marketing (internet sites and communications) and Sales through recommendations on data protection matters.
- Ensuring that 3DS products may be used by its customers and other partners in compliance with GDPR regulations.

3DS employees must not compromise personal data security. Personal data must not be collected, used and more generally processed, other than for one or more specified purposes, which must be legitimate and necessary for the Company's activities. As such, it is the responsibility of each employee to ensure the necessary security measures and applicable laws are implemented and respected.

3DS employees that become aware of any personal data leaks or breaches must immediately notify their manager and the 3DS Data Protection Officer. The Data Protection Officer can be contacted at:

[3DS.compliance-privacy@3ds.com](mailto:3DS.compliance-privacy@3ds.com)

### Question

What is Personal Data?

### Answer

Relates to any information about a natural person that enables them to be directly or indirectly identified.

Examples include a name, photo, fingerprint, postal address, email address, telephone number, social security number, internal ID number, IP address, login details and a voice recording.

# PROTECTION OF ASSETS AND CONFIDENTIAL INFORMATION

## INTELLECTUAL PROPERTY ASSETS

The notion of intellectual property applies to all intangible assets resulting from intellectual activity that are protected or protectable, in accordance with national and/or international laws and treaties on intellectual property rights and related rights (such as the protection of business secrets).

Intellectual property is a key 3DS asset. As it is crucial for the success of the Company's activities and its development, it is the responsibility of all employees to ensure it is protected.

Examples of 3DS intellectual property assets include inventions, source codes, software, documentation, designs, specifications and tools, trademarks, drawings and models, and protected confidential information (formulae, know-how, organizational charts, commercial procedures, marketing plans, etc.).

These intellectual property assets are protected by intellectual property rights (such as patents, copyright, trademarks, or industrial models or drawings) or related rights (such as the protection of business secrets). The means of protecting intellectual property assets can vary depending on the type of assets.

Certain assets, in particular inventions, must remain confidential in order to be properly protected, for example by a patent. Trademarks, like patents, must be registered in order to benefit from intellectual property rights.

3DS respects the intellectual property rights of third parties and ensures they are used according to the licensing agreements in force. The use of intellectual property assets of a third party (code, logo, image, etc.) requires prior authorization from the holder of the assets. Any use of an intellectual property asset must strictly comply with the authorization limits granted by the holder of the rights.

### Important:

3DS employees must be particularly careful to protect the Company's intellectual property assets, even after they have left 3DS.

They must comply with 3DS policies and procedures applying to intellectual property.

Another important aspect is to ensure 3DS confidential information is protected, together with any confidential information transmitted by third parties (see "Protection of confidential information").

For more information on this subject, 3DS employees can contact the 3DS Intellectual Property Department at [3DS. Legal-IP@3ds.com](mailto:Legal-IP@3ds.com)



## PROTECTION OF CONFIDENTIAL INFORMATION

Confidential information is considered to be information or data related or belonging to a natural or legal person, for which communication and/or use is limited and/or prohibited by a contract or by law on account of its nature (for example, data covered by insider trading laws) or information marked with a confidentiality or internal use restriction.

A “natural or legal person” means an individual or company, whether a company belonging to the Company or a third party.

Information freely accessible to the public is not considered as confidential information, providing its disclosure is not the result of a breach of a confidentiality obligation.

Communication of confidential information is governed by the terms and regulations applying to its protection.

### Examples of Confidential Information:

Documents bearing the words “confidential” or any other reference to confidentiality.

Information that is confidential by nature, such as:

- Unpublished corporate strategy;
- Current or future research and development programs, technological innovations, advanced technology, inventions, planned mergers or acquisitions, investments or divestments;
- Information received from customers or partners, such as their development plans/models or any other type of information for which communication has not been explicitly authorized;
- The existence and details of ongoing negotiations with partners or customers;
- Financial information (actual or provisional data) prior to its publication.

### Important:

- The word “Confidential” must be marked on a document for it to be identified as such.
- Confidential information relating to 3DS activities may only be communicated to authorized recipients, whether or not they are part of 3DS.
- The confidential information of our customers or partners, such as their development plans or best practices, must not be disclosed.
- The confidential information of 3DS, its customers or partners must not be discussed in public places (such as in an airplane, train, restaurant or seminar). This also entails taking extreme care over subjects discussed with friends, relations or any other third party, when these involve 3DS, its customers or its partners.
- Only authorized persons may communicate on behalf of 3DS with the media, journalists, consultants and analysts, as this communication can impact the reputation and share price of 3DS, its customers and partners.

### Question

Sometimes it is easier for me to email confidential documents using a private email account so that I can work from home. Is that allowed?

### Answer

No. We must be extremely careful to protect 3DS confidential information. Sending documents using an unsecured messaging account can lead to the inadvertent disclosure of the Group’s confidential information. For more information on this subject, please refer to the IT security rules available on the 3DEXPERIENCE platform, in the **3D Dashboard 3DSone – oneConduct, 3DS Information Security** or contact:

**[INFORMATION.SECURITY@3ds.com](mailto:INFORMATION.SECURITY@3ds.com)** or  
**[3DS.Legal-IP@3ds.com](mailto:3DS.Legal-IP@3ds.com)**



## MEDIA, ELECTRONIC AND DIGITAL TOOLS

3DS provides its employees with a range of media, electronic and digital tools. These media and tools, which are the exclusive property of 3DS, are for professional use and intended to improve the efficiency and productivity levels of the Company. The occasional use of the media, electronic and digital tools for personal purposes is tolerated, but must not be excessive or go against the interests of the Company or negatively impact employee efficiency.

Media and electronic and digital tools include computers, messaging systems, landline and mobile phones, voice messaging, photocopiers, fax machines, videoconferencing facilities, the Internet and intranet, applications and platforms.

Employees must comply with the terms of use of the 3DS IT Charter available on **3DEXPERIENCE** platform, in **3DSone – oneConduct**.

### Important:

- For security reasons, passwords are personal and may only be disclosed in exceptional circumstances, under the responsibility of the employee.
- 3DS employees must ensure they respect the confidential nature of information classified as such.

- 3DS employees must not attempt to read, copy, disclose, modify or destroy information that is not intended for them or which belongs to other employees, even if this data is easily accessible.
- Security measures covering computers, networks, servers and any other IT media must be complied with (for example, unauthorized access to the login details or passwords of another person or access to data files).
- Protected electronic media must be used to transmit, register and receive data that may be sensitive or confidential, either for 3DS or a third party.
- When required by law, commercial documents and information must be preserved in an appropriate manner. Consequently, the use for professional purposes of any communication methods designed for the content to be instantly or rapidly deleted, is prohibited.
- The use of communication services provided by 3DS is recommended.
- 3DS employees using communication services provided by a customer must consult the Legal Department for details on the requirements regarding communication data preservation and traceability provided by law.



## DISCIPLINARY SANCTIONS

In the event of a breach of one or more of the provisions of this Code of Business Conduct, employees may be subject to disciplinary sanctions under the provisions of the Internal Regulations relating to disciplinary sanctions.

# WHISTLEBLOWING

3DS relies on its employees to understand and apply its internal policies and procedures. If an employee suspects or has knowledge of an ethics breach (as defined below), they are encouraged to notify their manager or the 3DS Ethics and Compliance Department.

As outlined in the 3DS internal whistleblowing procedure, employees that have personal knowledge of:

- Conduct or a situation that may constitute an act of corruption or influence peddling, as described in the 3DS Code of Business Conduct and Anti-corruption policy,
- A crime or criminal offense, an established serious breach of applicable laws or regulations or of an international commitment ratified or approved by France, a threat or serious consequences for the general interest,
- A risk of a serious infringement of Human Rights, basic liberties, the health and safety of individuals or damage to the environment,

can notify either their line manager of this ethics breach (joining supporting documents) or the Ethics and Compliance Department at the following address:

[people.ethicscommittee@3ds.com](mailto:people.ethicscommittee@3ds.com)

Although reports can be made anonymously, we encourage employees not to report ethics breaches anonymously, to enable the 3DS Ethics and Compliance Department to contact the reporting employee to obtain additional information. The identity of a person reporting an ethics breach remains strictly confidential and will not be disclosed to persons other than those specifically in charge of whistleblowing within 3DS. Furthermore, 3DS prohibits any retaliation against a whistleblower acting in good faith and will protect their identity.

Any third party may also report an ethics breach to 3DS at the following address: [people.ethicscommittee@3ds.com](mailto:people.ethicscommittee@3ds.com)

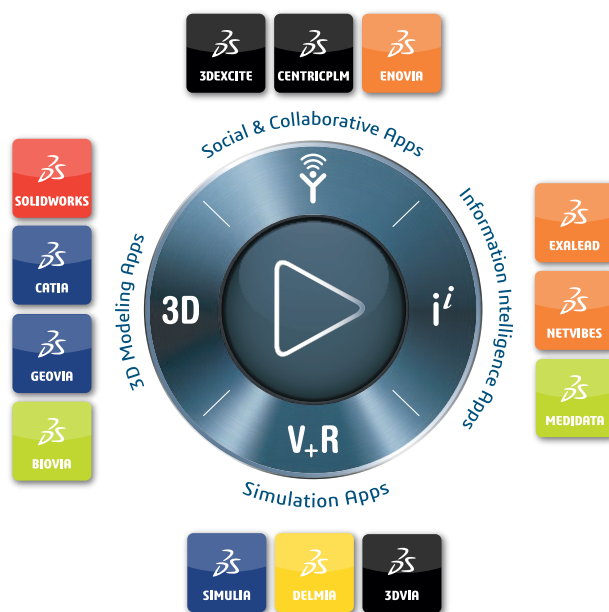
For more information on this subject, 3DS employees are encouraged to carefully read the 3DS Internal whistleblowing procedure available on **3DEXPERIENCE** platform, in **3DSone - oneConduct**.



**Dassault Systèmes**  
**Ethics and Compliance Department**  
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 78946 Vélizy-Villacoublay  
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