

Code of Ethics



September 2025

LECTRA

We pioneer. You lead.

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Message from the CEO

Ethics and integrity lie at the heart of Lectra's identity.

These core values guide every action we take, both internally and externally. They represent important standards for all members of our team and are the reason why our clients, partners and investors place their trust in us.

Today, as we evolve in an increasingly complex and constantly changing environment, respecting these principles is more vital than ever for our collective success. Every action we take, every decision we make and every relationship we form must reflect our commitment to acting transparently and responsibly.

The purpose of Lectra's Code of Ethics is to set clear expectations. It should be used as a reference to guide our day-to-day actions and choices. It sets out the rules and behaviors to be followed by all Lectra staff, without exception.

Together we have a responsibility to contribute to an honest, respectful and positive working environment and to build a sustainable future based on ethical and inclusive commercial practices.

I encourage you to read this document and fully integrate it into your working practices. Your commitment to respect these principles is vital.



Daniel Harari
Chairman and Chief Executive Officer

Commitment of Executive Committee members

As members of Lectra's Executive Committee, we have a collective responsibility to conduct the Group's affairs with integrity and transparency.

We are fully aware of our role in the dissemination, explanation and day-to-day implementation of the principles in our Code of Ethics, which guide all our activities, wherever we operate in the world. **This is not only a moral imperative but is also vital for Lectra's sustainability and success.**

We have a duty, both individually and collectively, to set an example and show discipline in our behavior. We need to demonstrate through our day-to-day actions that the ethical principles governing our management do not just apply to our company culture but are embedded in it.

By acting thus, we strengthen our stakeholders' trust and ensure Lectra has a sustainable future.

We are counting on each of you to support and propagate our approach.



Commitment of Executive Committee members



Daniel Harari
Chairman & Chief
Executive Officer



Maximilien Abadie
Deputy CEO



Anne Berfiga
General Secretary



John Brearley
President,
Americas



Antonella Capelli
President,
EMEA



Thierry Caye
Chief Technology Officer



Olivier du Chesnay
Chief Financial
Officer



Javier Garcia
Chief Customer
Officer



Amit Gautam
Chief Executive Officer
of TextileGenesis



Laurence Jaquet
Chief Customer Success
Officer



Michael Jais
Chief Executive Officer
of Launchmetrics



Maria Medrone
Chief Marketing and
Communications Officer



Frédéric Morel
President,
Asia Pacific

Introduction to Lectra's Code of Ethics

At Lectra, ethics and integrity are the cornerstone of our corporate culture, guiding everything we do.

Each employee plays a vital role in this, which is why we have a Code of Ethics setting the standards of behavior expected of everyone.

This Code of Ethics goes above and beyond the legal obligations mentioned below. It is built around core principles such as business ethics and integrity, which are central to our day-to-day interactions.

The commitment to respect the environment and to promote social responsibility encompasses respect for the rights of employees and for human rights. Every action counts.

As a signatory of the **UN Global Compact** since 2023, Lectra is committed to complying with the laws and regulations in force in every country where it operates, with reference to:



- The Universal Declaration of Human Rights;
- The OECD (Organization for Economic Cooperation and Development) Guidelines;
- The UN Convention on the Rights of the Child;
- The United Nations Guiding Principles on Business and Human Rights, the Ten Principles of the UN Global Compact, and the associated Sustainable Development Goals (SDGs).

The fundamental rights of workers are also respected through full compliance with the standards set by the Fundamental Conventions of the **International Labour Organization** (ILO), such as:



- The effective abolition of child labor;
- The elimination of all forms of forced labor;
- A safe and healthy working environment;
- The elimination of discrimination in respect of employment and occupation;
- Freedom of association and the effective recognition of the right to collective bargaining.

With this Code of Ethics, Lectra is making a commitment as a company and encourages all its staff and partners to live up to the principles and values it contains in each of their day-to-day interactions.

In case of doubt

The aim of this Code of Ethics is to define and illustrate the types of behavior to avoid, considered contrary to the principles and values described in the Code.

However, it does not pretend to answer every ethical question that could arise in the course of our work. Lectra therefore encourages everyone to use common sense and discernment when handling different situations, and to act in keeping with the Lectra Group's values and in accordance with the law.

The Group will not tolerate any form of retaliation against an employee who, in good faith, raises concerns or cooperates with investigations into alleged breaches of this Code of Ethics.

In case of doubt or if you have any questions, or to report an actual or suspected breach of the rules set out in this Code, depending on the situation and you should:

1. Speak to your line manager (preferred wherever possible);
2. Seek advice from your Human Resources Department;
3. Contact the Group's Compliance Manager:
ethics.compliance@lectra.com;
4. Use the whistleblowing procedure, accessible on the Group's website and in Human Resources within all subsidiaries, where you can remain anonymous if you wish.

In complex situations, the following questions can be used to guide you:

1. **"Is this the right thing to do?":**
does this situation respect the values and principles set out in this Code of Ethics?
2. **"Am I acting within the law?":**
are there any laws or regulations that could be broken in this situation?
3. **"Is my behavior acceptable?":**
could I talk about it openly to my family, colleagues, customers and partners?
4. **"Would I/the person gain any undue advantage in this situation, without acceptable justification?"**





Lectra's
commitments

Lectra's commitments

Integrity

Lectra undertakes to maintain the highest standards of integrity in all its operations.

With this Code of Ethics, the Group is clearly setting out its expectations of all staff in regards to integrity. The Code includes guidelines on reporting inappropriate behavior, particularly corruption and fraud, to ensure that all employees understand the importance of integrity in their day-to-day actions.

Lectra regularly organizes training sessions on corruption prevention and ethical behavior. During these sessions employees learn to recognize risky situations and to act appropriately, through case studies and practice scenarios tailored to their jobs.

Business ethics

Lectra undertakes actions to ensure its commercial practices are fair and transparent, as defined in the Code of Ethics, and to respect more specific procedures related to business ethics.



Lectra cannot tolerate any practices contrary to ethical business ethics, even in countries where locally certain practices are commonly encountered in business. The Group also applies a fair competition policy banning all forms of anti-competitive practice, such as defamation of competitors or price fixing.

Finally, Lectra prioritizes transparent and fair relationships with its suppliers, undertaking to respect contracts and avoid abusive practices. In return, **the Group asks its suppliers to sign a responsible purchasing charter in which they undertake to respect each point in the “What Lectra asks of its suppliers” section.**

Lectra works to ensure respect for human rights in all its activities and to prevent any human rights breaches in its supply chain.

Respect for human rights

For this reason, Lectra publishes a **Human Resources charter** accessible both internally and externally. This charter sets out its principles of respect for human rights, workers' rights, and health and safety at work.

The selection of subcontractors is dependent on them signing the **Lectra's responsible purchasing charter** and on a regular audit of their practices for subcontractors requiring **FSC® (Forest Stewardship Council®)** certification.



Lectra's commitments

Workers' rights

Lectra respects and defends the rights of workers by guaranteeing fair and legal working conditions. The Group guarantees employee representation by holding workplace elections to select staff representatives in the relevant countries and then consulting the resulting staff representatives regularly and also when any major changes in working conditions occur.

Equal opportunities and non-discrimination

Lectra promotes diversity and inclusion by prohibiting all forms of discrimination and promoting equal opportunities both when hiring and in day-to-day relationships at work.

Lectra therefore undertakes not to discriminate against anyone on the grounds of gender, sexual practices or sexual orientation, but also age, family situation, pregnancy, genetic characteristics, affiliation or not to an ethnic origin, presumed or professed political opinions, trade union activities, presumed or professed religious beliefs, physical appearance, first name or surname or, except in the case of unfitness recognized by the occupational physician, health status or disability of any kind.

Lectra ensures that all staff have equal access to opportunities for professional development through a career management scheme integrated into the Human Resources Information System (HRIS), for which training and mentoring programs are run.

Finally, Lectra ensures that promotions and pay increases are based on objective and transparent criteria.

Prevention of harassment

Lectra has a policy of zero tolerance towards all forms of harassment, whether psychological or physical.

The Group has deployed training modules on prevention of harassment as part of its professional development program. This mandatory training alerts all employees to the issues and to appropriate behavior.

Lectra also has an anonymous reporting system enabling all employees to report incidents of harassment without fear of reprisals.



Lectra's commitments

Transparency

Lectra guarantees total financial transparency by publishing clear and accessible information, in accordance with legal and ethical standards, particularly through its publication of quarterly and annual financial reports accessible to all shareholders and stakeholders, setting out in detail its financial performance.

The Group relies on its statutory auditors to audit its half-yearly financial statements. These audits aim to ensure compliance with the **international financial reporting standards** (IFRS) and ethical principles, and to verify the effectiveness of its internal control procedures, thus eliminating any misleading accounting practices.

Lectra regularly publishes detailed information about its activities and its extra-financial performance. Since 2018 this information has been included in the annual **Extra-Financial Performance Declaration** (DPEF), and since 2025 it is presented in the **Sustainability Report** which meets international ESG standards (ESRS).

The publication of policies and procedures, whether these concern all staff (e.g. travel and purchasing policies) or only certain roles, promotes transparency regarding the rules that employees should follow in their day-to-day tasks.

Finally, internal webinars are held on a quarterly basis, or when the situation requires, to inform all employees of the company's results, the strategy adopted, the impact of a reorganization or an acquisition, for example, followed by a Q&A session open to all employees.

Health and safety at work

Lectra implements strict policies to guarantee a safe and healthy working environment for all staff.

Measures are therefore taken to address every exposure risk within each of the subsidiaries. This involves training in health and safety at work, along with regular training exercises, and specific training for employees handling hazardous products, particularly on industrial sites. Finally, the Group maintains a permanent labor relations dialog on issues related to health and safety at work.

Responsibility

Lectra takes a proactive, methodical approach to assessing the risks associated with its activities, recognizing that managing risk is essential to guarantee the Group's sustainability and resilience. This process is not limited to financial aspects, but also covers operational, reputational, social and environmental risks.

At a financial level, this means constant monitoring of financial performance and proactive management of accounts receivable.

At an operational level, Lectra implements rigorous procedures including regular audits, employee training and updating security procedures.

Finally at a reputational level, customer satisfaction surveys and media coverage analyses are carried out to anticipate and quickly deal with any situation likely to affect the perceptions of the company.

Lectra's commitments



Confidentiality/Intellectual property

The protection of information belonging to Lectra itself, its employees, or the stakeholders with which it works, is absolutely vital.

Whether it is intellectual property or other kinds of information (commercial data, personal data), Lectra commits contractually, but also internally through its policies and procedures, to respect the confidentiality of the information.

Finally, the Group asserts its intellectual property rights if it believes a breach has occurred.

Lectra's commitments



Environmental responsibility

Lectra takes measures to reduce its environmental impact and promote sustainable practices, particularly through the deployment of its environmental policy and its climate plan.

The Group implements an ecodesign policy to take account of the environmental impact of each project and minimize it.

Lectra has also committed, as part of its **Forest Stewardship Council® (FSC®)** certification program, to certify its chain of custody for certain consumables sold to its customers. This involves annual internal and external audits to check that the necessary criteria to maintain the certification obtained in 2023 is being correctly applied.



Lectra's staff commitments

Integrity

Lectra's staff will act with honesty and transparency in all interactions with other employees and with anyone in connection with the Group, and report any dubious situations or unethical behavior, strictly rejecting any direct proposition designed to influence their choices or decision-making.

Business ethics

Staff report every situation they witness that is contrary to business ethics as defined by Lectra. If gifts are offered by a partner (customer, prospect, supplier, etc.), they shall systematically forward the request to the Compliance Manager for assessment.

Transparency

In financial matters, the staff concerned shall handle information responsibly and shall report all irregularities, in compliance with established accounting procedures. They shall respect the insider risk prevention timeframe.

More generally, staff shall communicate openly with all their colleagues, and share relevant information transparently in compliance with the confidentiality rules, regardless of their hierarchical position. Staff shall listen actively and then communicate clearly in their day-to-day interactions.

Diversity, inclusion and combating harassment

All staff are an active part of a workplace that promotes equality and respects differences due to culture, gender, age, ability or sexual orientation.

On this basis they contribute to combating all forms of harassment. This commitment is apparent in particular during team meetings, where everyone ensures certain voices do not always dominate, intervenes when they witness inappropriate behavior, and encourages their colleagues to adopt the same proactive attitude.

Workers' rights

All staff support their colleagues with handling difficult situations that could lead to a violation of their rights. Managers are aware of everyone's rights in the workplace, and ensure the regulations are respected.

Lectra's staff commitments

Respect for human rights

Staff respect the fundamental rights of each individual, and report any situations in which these rights could be threatened.

Health and safety at work

Staff follow the safety protocols, correctly use protective equipment where necessary, and report any safety hazard or incident to the relevant people.

Responsibility

Regardless of their position in the organization, staff fulfill their responsibilities within the limits of their competencies and powers, while respecting the commitments made and actively contributing to the objectives of the team and the company.

Responsibility towards stakeholders

Staff listen to and take into consideration the needs of customers, suppliers and partners, engaging in constructive dialog to improve mutual relations, while finding compromises.

Equal opportunities

Each staff member takes the fairest and most balanced decisions possible in their day-to-day activity. More generally, the initiatives aimed at ensuring equal treatment and non-discrimination, whether during hiring, promotion or talent development, are respected by everyone.

Confidentiality/Intellectual property

All staff will follow the company's internal policies and procedures when handling and processing confidential and sensitive information, and/or personal data, whether it belongs to Lectra, one of its employees or its partners. All failures must be reported to an employee's line manager to protect the company from any information leaks detrimental to one of the parties.



Lectra's staff commitments

Compliance with laws and regulations

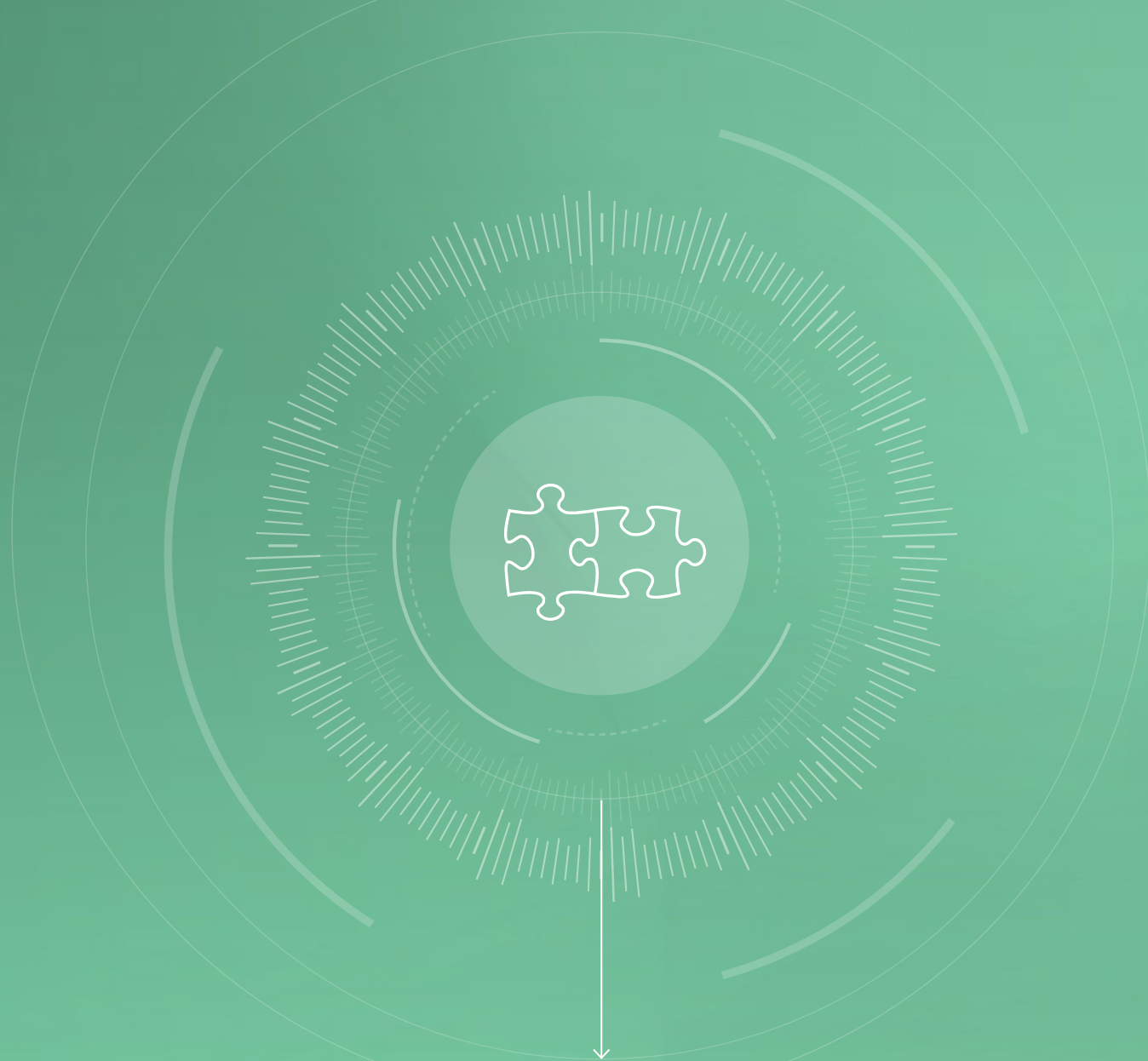
All staff keep abreast of the laws and regulations relevant to their job, and ensure that all their working practices are compliant with them, whether in their workplace or while traveling for work.

All staff contribute to the spread of the sustainable best practices to be adopted day to day, independently of what is requested by the Group, and report any situation requiring improvement.

Environmental responsibility

All staff are encouraged to adopt sustainable practices on a daily basis, particularly by reducing waste, encouraging recycling, and giving preference to more environmentally friendly choices in their work, such as using digital resources instead of paper.





What Lectra asks
of its partners

What Lectra asks of its partners

Echoing the commitments made by the Group, Lectra asks its stakeholders to apply the same principles in their internal organization and towards their own stakeholders.

Integrity

Suppliers undertake not to offer gifts or financial incentives to Lectra's purchasing managers, and to inform Lectra immediately of any conflict of interest that could affect their mutual business relationship.

Business ethics

Suppliers must abide by Lectra's Code of Ethics, or provide an equivalent document that has already been published, covering the whole of their value chain. In any event, suppliers must commit by signing **Lectra's responsible purchasing charter** and acknowledging that they have read the Code of Ethics.

The Group asks its suppliers and partners to ensure that their pricing practices are fair and transparent, avoiding any form of unfair competition.

Lectra's commercial agents are also required to comply with the Group's rules on ethics and are bound by a specific business contract, since their work contributes directly to the Group's financial results.

Transparency

The publication of audited financial statements, such as the statements the Group publishes, provides a guarantee of transparency and financial responsibility.

Industrial suppliers regularly share reports on their supply chain, giving Lectra visibility over the materials supplied and the production conditions. Any obstruction in one of these processes, such as a freight forwarder notifying of changes in customs administrative formalities, must be reported.

What Lectra asks of its partners

Diversity, equal opportunities and combating harassment

Lectra asks its partners to implement hiring programs targeting candidates from diverse backgrounds, and to train its employees on working together and respecting differences.

Lectra asks its partners to deploy a strict policy on preventing harassment.

Respect for human rights

Lectra asks its stakeholders to deploy and comply with policies in respect of:

- The Universal Declaration of Human Rights;
- The OECD (Organisation for Economic Cooperation and Development) Guidelines;
- The standards established by the Fundamental Conventions of the International Labour Organization (ILO), such as:
 - The effective abolition of child labor;
 - The elimination of all forms of forced labor;
 - A safe and healthy working environment;
 - The elimination of discrimination in respect of employment and occupation;
 - Freedom of association and the effective recognition of the right to collective bargaining.

Lectra also asks its stakeholders to ensure that their subcontractors respect human rights, particularly in countries with regulations that offer fewer protections than in the European Union.

Health and safety at work

Lectra asks its suppliers to implement strict safety measures and to train their employees in best practices for health and safety at work.



What Lectra asks of its partners

Responsibility

Lectra encourages its customers, particularly in the fashion sector, to consider adopting sustainable production practices, particularly by reducing waste and using materials sourced more responsibly.



The Group also recommends that its partners document every step in their process. This enables them to trace tasks chronologically if an incident occurs affecting the persons involved or their business relationship with the Group, related to the principles described in this Code.

The Group asks its suppliers to take account of impacts on the environment, health, safety and the welfare of surrounding communities in all their projects.

Confidentiality/Intellectual property

Everyone who has any dealings with Lectra must sign a confidentiality agreement to protect sensitive information shared by the two parties.

Partners with an account enabling them to access Lectra's information system must comply with the policies in force, which may for example be set out in an IT charter, and must sign an agreement to access Lectra's network.

In the context of joint projects, the Group and the partner shall define in advance, together, the contours of the resulting intellectual property, in a contract specifically for this purpose.

What Lectra asks of its partners

Compliance with laws and regulations

Stakeholders are asked to carry out regular checks of their compliance with local and international regulations on trade, the environment, data protection and labor law. Transport service providers must ensure that their operations meet safety standards and standards for the transport of goods, regardless of the means of transport used.

Environmental responsibility

In addition to signing the **Lectra's responsible purchasing charter**, industrial suppliers must commit to reducing their carbon footprint, particularly by investing in renewable energy technologies for facilities where they process product orders for Lectra.

The Group also asks its transport service providers, as far as possible, to offer means that reduce the overall carbon footprint of their operations.

Similarly, partners must implement a recycling program to reduce the amount of waste generated by activities done for Lectra.

Lectra encourages its customers to work actively to reduce their industry's carbon footprint, whether by optimizing certain processes such as tanning baths for leather hides in the automotive and furniture sectors, finding more responsible supply sources, or guaranteeing the traceability of materials. In addition, for devices supplied by Lectra, dismantling instructions are provided for the end of life of the device, to facilitate the recycling of the various parts.



What Lectra asks of its partners





Lectra's
Ethics Committee

Lectra's Ethics Committee

Lectra's Ethics Committee is responsible for

- Ensuring the Code of Ethics is widely disseminated, particularly through training sessions, and proposing any changes it considers necessary;
- Listening, supporting and advising employees and other stakeholders;
- Receiving whistleblowing reports related to the Code of Ethics and ensuring they are handled appropriately;
- Making recommendations to the senior management teams on ethical issues, while drawing their attention to risks that could affect Lectra's activities for ethical reasons;
- Examining, if necessary, all Lectra's ethics-related communications, including those with international, governmental and non-governmental organizations;
- Participating on request in the development of specific procedures or policies at a local level to put into operation each of the principles and values set out in this Code of Ethics.

Lectra's Ethics Committee is composed of

-  **Daniel Harari**, *Chief Executive Officer*
-  **Anne Borfiga**, *General Secretary*
-  **Frédérique Duffaud**, *Vice President Sustainability*
-  **Clément Castano**, *Compliance Manager*

The Ethics Committee works closely with Legal Affairs and with Human Resources to ensure this Code is implemented and respected. The Ethics Committee has the power to order inspections of all Lectra's sites to check the application of this Code, or to appoint third parties to do this. The Ethics Committee examines the results.

The Ethics Committee regularly reports to the different Sustainability Committees of the Board of Directors.



Monitoring, control and
whistleblowing system

Monitoring, control and whistleblowing system

At Lectra, transparency and responsibility are vital.

The monitoring and whistleblowing system enables all staff, partners and stakeholders to report any situation that constitutes a potential breach of this Code of Ethics. The whistleblowing system is designed to protect people's rights and to guarantee a safe and respectful working environment for all.

Monitoring of the proper application of this Code is provided by:

- managers, on a day-to-day basis;
- a system of permanent and periodic controls managed within each region and at Group level;
- an internal whistleblowing system (see whistleblowing procedure).



Monitoring, control and whistleblowing system

Whistleblowing principles

- > **Confidentiality:** all whistleblowing reports are handled confidentially. The whistleblower's identity is protected and the information concerning the reported facts is handled as carefully as possible;
- > **Accessibility:** the whistleblowing procedure is accessible to all Lectra's staff and stakeholders, whether internal or external. Whistleblowing reports can be made via a secure online form or communication channels specifically for this purpose;
- > **Whistleblower protection:** Lectra guarantees that no retaliatory or discriminatory measures will be taken against those who whistleblow in good faith, to give people confidence to report information;
- > **Follow-up of whistleblowing reports:** every report is examined by a special team and forwarded to Lectra's Ethics Committee. Appropriate measures are then taken to resolve the reported situation. Whistleblowing reports will be followed up with a transparent communication on the action taken, as far as possible.

Lectra is committed to creating a working environment in which everyone feels safe to express their concerns. The extended whistleblowing system, which is an essential component of Lectra's corporate culture, reflects its desire to promote integrity and respect for human rights.

All staff and partners are invited to use it if necessary to promote a workplace that is ethical, responsible and respectful of the Group's values.

Reports submitted using the whistleblowing procedure must not contain facts, information or documents subject to protections such as attorney-client privilege, the secrecy of investigations, the secrecy of deliberations in a court case, national defense secrecy or medical confidentiality.





Sanctions

Any behavior considered inappropriate may, depending on its seriousness, lead to sanctions in accordance with the provisions laid down in the internal regulations.

In addition, every staff member involved could be subject to prosecution.

If confidentiality rules and/or data security rules are broken, a decision could be made as a protective measure to immediately suspend the information system access rights of the staff member concerned as soon as the facts are brought to light, pending an investigation.



**Whistleblowing platform
(open to anyone in and out of Lectra):**
<https://www.lectra-ethics.com/>



Glossary

Glossary

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1.
Business ethics
set of principles governing fair and transparent commercial practices.
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2.
Social responsibility
commitment by a company to act ethically and to contribute to the welfare of society.
-
3.
Ethics committee
body responsible for implementing and monitoring the Code of Ethics within Lectra.
-
4.
UN Global Compact
initiative that encourages companies to adopt sustainable and socially responsible practices.
-
5.
Sustainability report
document presenting an organization's performance on sustainability and social responsibility. It aims to communicate transparently the organization's environmental, social and economic impacts.
-
6.
ESG standards
ESG (Environmental, Social and Governance) standards are a set of criteria used to assess a company's performance on sustainability and social responsibility. They are increasingly used by investors, regulators and consumers to assess the sustainability and responsibility of companies, thereby influencing investment decisions and consumption choices.
-
7.
Whistleblowing system
system enabling staff to report behaviors contrary to the company's ethical values. It is based on a clearly defined, published procedure that has been explained to staff.
-
8.
Whistleblowing
reporting of a potential breach of the Code of Ethics or of the law.
-
9.
Sanctions
disciplinary measures that may be taken in the case of a breach of the Code of Ethics or inappropriate behavior.
-
10.
Ethics training
training sessions to make staff aware of ethical principles and the expected behavior.
-
11.
Stakeholder
any person, group or organization that has an interest in a company's activities, decisions or results. This includes but is not limited to, employees, customers, suppliers, investors, local communities, regulatory authorities and non-governmental organizations. Stakeholders may influence or be influenced by the company's actions; their engagement is necessary to ensure the sustainability and social responsibility of the organization.
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12.
Partner
a partner is an entity (individual, company or organization) that works with Lectra in the context of a commercial relationship or on a joint project sharing goals, resources and responsibilities to attain mutually beneficial results. Partners can include suppliers, distributors, strategic customers or other companies that Lectra works with to develop specific products, services or initiatives.

LECTRA

We pioneer. You lead.