

INFOTECH SERVICE FZ-LLC - Duty of Care Plan

1. Introduction

The INFOTECH SERVICE FZ-LLC Duty of Care Plan is designed in compliance with French law No. 2017-399 (March 27, 2017) concerning parent companies and subcontracting companies, and integrates elements of the revised European Directive 2019/1937. It applies to all business activities within INFOTECH SERVICE FZ-LLC, its subsidiaries, subcontractors, and long-term suppliers.

The plan seeks to identify and prevent risks related to the following areas:

- **Ethics:** Combatting corruption and upholding ethical standards.
- **Human Rights:** Ensuring respect for human rights and fundamental freedoms.
- **Health and Safety:** Protecting the health and safety of individuals.
- **Environmental Protection:** Preserving biodiversity and minimizing environmental impacts.

The overarching goal is to mitigate adverse human rights and environmental impacts throughout the company's operations and value chains.

2. Governance

The plan is overseen by the **Duty of Care and Human Rights Committee**, which includes heads from key departments such as Purchasing, Sustainability, and Legal. The committee is responsible for:

- Designing and enforcing the Duty of Care Plan.
- Conducting risk assessments related to INFOTECH's business partners.
- Ensuring compliance with the French Duty of Care and Sapin II anti-corruption laws.
- Supervising continuous improvements in the Duty of Care Plan.

3. Policies

The Duty of Care Plan is built on several key policies:

- **Environmental Commitment**
- **Health, Safety, and Well-being Commitment**
- **Human Rights Policy**
- **Responsible Purchasing Policy**
- **INFOTECH SERVICE FZ-LLC's Code of Ethics and Business Partner Code of Conduct**

These policies are designed to enforce ethical behavior, uphold human rights, and ensure environmental sustainability across the business operations and supply chain.

4. Risk Mapping

Risk assessments are conducted by theme:

- **Human Rights:** Risks related to violations of human rights, such as forced labor, are mapped by the Chief Sustainability Officer.
- **Health & Safety:** Workplace health and safety risks are reviewed based on historical incident data.
- **Environment:** Environmental risks are analyzed based on the company's and its partners' operations.
- **Ethics:** Corruption risks are assessed based on country-specific factors using the Corruption Perception Index (CPI).

5. Duty of Care Implementation

The Duty of Care Plan includes both **permanent** and **reinforced monitoring** of high-risk business partners. INFOTECH SERVICE FZ-LLC applies rigorous risk assessments and follows up on corrective actions for partners classified as "high risk."

High-risk partners are required to implement corrective actions within six months of initial evaluation, and regular audits are conducted to ensure ongoing compliance. Strategic partners undergo a comprehensive risk self-assessment every three years.

6. Risk Attenuation and Monitoring

INFOTECH implements measures to continuously monitor and mitigate identified risks. The company maintains a rigorous audit trail, ensuring that its business partners adhere to the Duty of Care Plan's requirements.

7. Key Indicators and Reporting

INFOTECH SERVICE FZ-LLC tracks the following indicators to evaluate the effectiveness of the Duty of Care Plan:

- Breaches of the Code of Ethics.
- Violations of the Human Rights Policy.
- Accidents involving employees and subcontractors.
- Coverage and acceptance rates of the Business Partner Code of Conduct.

The results of these indicators are reviewed annually to ensure compliance and inform future improvements.