Axway's priority corporate responsibility challenges

In 2018, Axway carried out an analysis to identify priority challenges in terms of corporate social responsibility (CSR) as part of the implementation of the EU directive regarding non-financial reporting.

Interviews were conducted with operating and support department managers. Challenges were reconciled using the risk mapping.

Two major challenges arose from this analysis:

- Human Resources: for Axway, attracting, developing and retaining talent;
- Ethical and environmental responsibility in Axway’s business.

In accordance with the identified priorities, its business model and Group commitments, in this chapter, Axway presents avenues to create value in relation to the Sustainable Development Goals, a reference now shared by many companies.
The Axway context

Axway's business

As a software publisher, Axway supports its customers - businesses and major organisations - each day to modernise their IT infrastructures, by securely moving, integrating and presenting their data.

Axway teams are located in 17 countries and distribute Group solutions across all continents. 11,000 customers worldwide use Axway solutions.

The AMPLIFY™ Hybrid Integration Platform offers Axway customers a comprehensive catalogue of digital services and tools, able to respond to IT integration requirements within a major organisation.

Axway solutions are offered in the form of perpetual software Licences or Subscription contracts. Billing depends on usage of the solutions. This two-part offer reflects the flexibility expected by customer companies.

Growth in Subscription contracts - and more generally the widespread adoption of cloud offers by major organisations - are strategic areas of development for Axway between now and 2020.

The sector context

Trends in Axway's infrastructure software sector are explained in Chapter 1 of the Registration Document page 3 and in the Group Profile pages 12 and 13.

In sum, Axway operates in a changing market which is characterised by the following major trends:

- cohabitation of legacy IT systems and new digital requirements;
- constant technological progress associated with new “IT data” consumption patterns, which require industry players to modify their organisation to support new business models;
- significant competition in terms of recruitment and talent retention;
- finally, and as a result, frequent consolidation movements between players.

Axway's business model

The Group's business model is presented in detail in the Axway Profile in the Registration Document and summarised below.

As a software publisher, Axway develops, distributes, integrates and maintains its own solutions.

Thanks to a strong and diverse product catalogue, Axway is able to connect all data from any terminal (computer, server, mobile devices, etc.) and in any location, transforming patchy data and services into simple and fluid digital experiences which provide value for each use case.

With the AMPLIFY™ platform, Axway aims to become a leader in the hybrid integration platform market [On-Premise and/or Cloud] by the end of 2020.
Axway ecosystem and stakeholders

By its very nature, software publication requires Axway to interact with several types of stakeholder within its ecosystem: Employees, Customers, Technology and Business Partners, Suppliers, Professional Bodies and Civil Society Organisations. The quality of relations and ethics within this ecosystem have always been core values of the Axway Group.

System and measures per stakeholder

<table>
<thead>
<tr>
<th>Stakeholders</th>
<th>Value Creation</th>
<th>System/Measures</th>
<th>SDG GOALS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employees</td>
<td>● Attracting, developing and retaining talent</td>
<td>● 2 in-house surveys to assess the relationship between each employee and the Company</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>● 4 areas of improvement: Collaboration, Empowerment &amp; Accountability, Continuous Improvement, Customer Centricity</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>● In-house social network</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td></td>
<td>● Labour relations with staff representative bodies</td>
<td>5</td>
</tr>
<tr>
<td>Customers</td>
<td>● Supporting customers by providing Axway Software to transform their information system, speeding up the launch of new products, new services and uses for their own customers</td>
<td>● Customer focused organisation</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>● Measuring customer satisfaction</td>
<td>6</td>
</tr>
<tr>
<td></td>
<td></td>
<td>● Ecovadis Label</td>
<td>7</td>
</tr>
<tr>
<td></td>
<td></td>
<td>● Recognition of Axway Products by Business Analysts</td>
<td>8</td>
</tr>
<tr>
<td>Partners and Suppliers</td>
<td>● Innovating and deploying projects with our partners</td>
<td>In total, + 100 partners:</td>
<td>9</td>
</tr>
<tr>
<td></td>
<td>● Collaborating with suppliers and service providers</td>
<td>● Business partners to extend Axway activity in consultancy, integration and resale of solutions in the Americas, Europe and Asia-Pacific</td>
<td></td>
</tr>
<tr>
<td></td>
<td>● Keeping business ethics in mind</td>
<td>● Technological partners for the co-creation of software, technological integration and hosting</td>
<td></td>
</tr>
<tr>
<td>Shareholders</td>
<td>● Communicating based on best practices</td>
<td>MiddleNext Code</td>
<td>10</td>
</tr>
<tr>
<td></td>
<td>● 271 investor meetings 10 investor seminars</td>
<td>Listing on Euronext Paris</td>
<td></td>
</tr>
<tr>
<td></td>
<td>● 2 roadshows</td>
<td>CAC Tech, Tech 400 indexes. Gaia Index</td>
<td></td>
</tr>
<tr>
<td></td>
<td>● 4 financial analysts</td>
<td>Historical redistribution rate &gt; 30% of net income</td>
<td></td>
</tr>
<tr>
<td></td>
<td>● Annual Shareholder Meeting</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>● Shareholder Website and digital tools</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Civil Society</td>
<td>● Contributing to sustainable development goals, particularly in relation to education and local engagement</td>
<td>● The Global Compact</td>
<td>11</td>
</tr>
<tr>
<td></td>
<td></td>
<td>● Participation in education and social programmes by associations and foundations in several countries</td>
<td></td>
</tr>
</tbody>
</table>

(1) France scope.
Governance and corporate responsibility tools implemented by the Group

Axway governance, described in Chapter 3 of the Registration Document and summarised in the Axway Profile, is based on a distribution of powers between the Board of Directors and the Chief Executive Officer in accordance with recommendations in the Middlenext Code, which the Group abides by.

<table>
<thead>
<tr>
<th>Board of Directors</th>
<th>Executive Committee</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chairman</td>
<td>Chief Executive Officer</td>
</tr>
<tr>
<td>14 members, including 7 independent members.</td>
<td>5 members responsible for implementing Group strategy</td>
</tr>
<tr>
<td>• Audit Committee</td>
<td></td>
</tr>
<tr>
<td>• Compensation Committee</td>
<td></td>
</tr>
<tr>
<td>• Selection, Ethics and Governance Committee</td>
<td></td>
</tr>
</tbody>
</table>

In terms of ethics and corporate responsibility, the Group has implemented processes and tools shared with all its stakeholders.

Axway became a member of the United Nations Global Compact in November 2016 and renews its support for this initiative each year, aware of future challenges regarding the environment and ethics in general.

Corporate responsibility tools

<table>
<thead>
<tr>
<th>Ethics and anti-corruption</th>
<th>Ethics charter and code of conduct</th>
</tr>
</thead>
<tbody>
<tr>
<td>Data protection</td>
<td>GDPR</td>
</tr>
<tr>
<td>Customer Satisfaction and Expectations</td>
<td>Net Promoter Score Measurement (1) and Surveys, Ecovadis</td>
</tr>
<tr>
<td>Employee well-being</td>
<td>Two annual in-house surveys Whistle-blowing system</td>
</tr>
</tbody>
</table>

Risk management

The Group’s risk management system is described in Chapter 1 of the Registration Document.

The risk management policy is part of strategy implementation and contributes to overall corporate performance in the long-term. The risk management system is based on a risk identification, regular evaluation and handling process controlled by the Group’s internal audit department.

(1) Net Promoter Score: customer satisfaction measurement tool.
1. Attracting, developing and retaining talent

Against a backdrop of technological transformation and significant changes in uses and development models, Axway’s primary challenge is to attract, develop and retain talent.

*There is a constant value creation cycle between Axway employees and customers who enhance each other’s experiences.*

The cultural and geographic diversity of Axway employees helps develop the skills of the Company and its stakeholders; the collaborative working method which supports the Group at an international level encourages action, innovation and collective initiative.

**New types of skills and collaboration**

Whilst Axway activities require constantly changing technological skills and methodologies, they also rely on new jobs, greater flexibility and new aptitudes. Amongst the major requirements, this includes:

- new jobs focused on community management (Community managers);
- more specialised marketing roles, notably product management, or the creation of new expertise regarding “lead generation”, where processes are supported by social networks, websites, mobile apps and new digital tools;

Furthermore, Axway’s activities require greater flexibility between jobs, greater transparency in managerial communication to share strategy, explain it and associate teams via more participative methods.

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**The “Hacking Week”**

* A week for alternate Innovation or Experimentation.

In 2018, each of the five Axway Research & Development sites dedicate 2 weeks to the “Hacking Week”, during which a team put their usual tasks to one side and instead focused on an innovation or experience. At the end of this week, the team - whose members were chosen freely - presented its results, which will help develop our products and working methods.

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**Employees committed to ethics and the environment**

Employees’ expectations from their company have changed over the years, and the search for “meaning” has become vital for both employees and potential employees. The positions taken by the company in their market and within their ecosystem are important to employees and encourage a closer bond with the company.

Axway’s role for its customers and its commitment to stakeholders provide meaning and generates interest in their job.

Axway has always carefully considered ethical and environmental responsibility.

With its employees, customers, prospects and shareholders, the Group makes ethics and trust key parts of its business relations, in all countries where it operates and with all its contacts.
Human Resources in figures at Axway

Workforce

With 1,848 employees in 17 countries, Axway is an international group acting locally with its customers and with its stakeholders.

Axway overall workforce

<table>
<thead>
<tr>
<th></th>
<th>2018</th>
<th>2017</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Workforce (1)</td>
<td>1,848</td>
<td>1,839</td>
<td>1,930</td>
</tr>
</tbody>
</table>

(1) As of 31 December - fixed and permanent contracts.

Payroll (including social contributions)

<table>
<thead>
<tr>
<th></th>
<th>2018</th>
<th>2017</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>177</td>
<td>188</td>
<td>190</td>
</tr>
</tbody>
</table>

Breakdown of the workforce by geographic location

- Americas: 29%
- North America: 28%
- Europe excluding France: 42%
- Asia/Pacific: 4%
- France: 25%
- Trade: 19%
- Customer Service Organisation: 49%
- Research and Development: 37%
- Support functions: 14%

Axway staff are 85% focused on customers and creating our solutions.

Average length of service: 6.5 years

The average length of service of Group employees was 6.5 years at 31 December 2018 vs. 7.2 in the previous year.

It is longer in Europe (6.8 years) than in North America (5.0 years).

The average length of service in France is 9.1 in 2018, vs. 10.7 years in 2017.

Average age: 40 years

The average employee age was 40 years old in 2018, vs. 41.7 years old in 2017.

Average age by geographic region

<table>
<thead>
<tr>
<th></th>
<th>2018</th>
<th>2017</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Europe</td>
<td>38.4</td>
<td>39.6</td>
<td>37.8</td>
</tr>
<tr>
<td>North America</td>
<td>43.4</td>
<td>44.5</td>
<td>42.8</td>
</tr>
<tr>
<td>Asia</td>
<td>41.5</td>
<td>41.0</td>
<td>40.3</td>
</tr>
</tbody>
</table>

Women in the workforce: 28%

As of 31 December 2018, women represent 28% of the Group’s workforce, vs. 26.8% in 2017. This improvement reflects Axway’s commitment to workplace gender equality.

In France, 81% of women are in a management position at Axway Software.
Attracting talent: recruitment

The Axway recruitment policy is presented here in more detail by the number of people who have joined the Group, and the profiles and systems in place to attract talent.

Recruitments

392 new employees

Axway recruited 392 new employees in 2018, vs. 283 in the previous year, 32% are women.

Highly sought-after engineers

In a sector where the number of IT jobs generally exceeds demand in many countries, there is significant competition for job adverts.

The European Commission estimates that there will be a shortage of 756,000 employees in the digital sector in Europe in 2020. (source: Talents du Numérique).

In France, three out of four companies in the industry confirm that they have difficulties in recruiting suitable candidates for their jobs (source: Syntec Numérique 2017).

Breakdown of recruitment by geographic region:

- 49% in Europe (excluding France);
- 17% in France;
- 29% in North America and South America;
- 5% in Asia/Pacific.

Average age of our new employees in 2018: 34 years old

23% of employees joining us in 2018 were over 40, 10% over 50 and finally 5% over 55.

The Axway recruitment policy focuses on permanent jobs (excluding temporary cover). These contracts represented over 95% of recruitment in 2018.

Level of education

Nearly all employees recruited were higher education graduates. However, new profiles have been targeted. This includes candidates who have changed career and who can provide new insights on the requirements and use of IT and digital technologies, notably to support new customer requirements (web platforms, mobile applications, new selling methods, etc.).

Relations with schools

Axway maintains close partnerships with 10 universities and engineering schools in several countries and offers internship opportunities each year. In addition to helping students learn about the Company and its business, they enable the students to join the Group upon completion of their studies.

A “learning” company in the onboarding process

Amongst the new employee onboarding processes, Axway has implemented the 3 years-3 jobs programme, during which employees on a work-study contract and apprentices discover Research and Development, Service and Customer Support jobs in turn.

20 work-study/apprentice employees benefited from this programme in France in 2018.

Axway’s objective is to write a shared employee-company history. This shared history is already demonstrated by the average length of service of Axway employees - 6.5 years - in a volatile job market.

Encouraging co-optation and writing a shared history

Axway has developed an attractive co-optation programme, encouraging Axway employees to propose candidates.

Internally, all positions are published via the company’s in-house social network.

On social networks, Axway employees can become Axway brand ambassadors by posting “Axway life stories” or short messages on the Group’s offer and innovations via Twitter, LinkedIn, Facebook and Instagram. To better understand and then share best practices in terms of social networks, a “Voice Storm” course was deployed with 206 managers.
Retaining talent

Identifying employee expectations and engaging in close dialogue

To retain employee talent, Axway is interested in their opinions. Satisfaction and workplace well-being surveys have been deployed and the results published throughout the Group for 3 years.

In 2018, internal dialogue was particularly active, following encouragement by the Human Resources Department and the steady involvement of Executive Management and members of the Executive Committee, who are keen to form closer ties.

Very detailed surveys helped identify the employees’ level of connection to their Axway company.

- **Axwegian’s Voice: the in-house discussion programme:**
  Aimed at all companies at the end of 2017, the “Axwegian’s Voice” in-house survey provided a complete analysis for each country regarding areas of satisfaction and expectations with a response rate of 83%.
  In early 2018, based on this detailed information, Axway launched 4 themes for improvement:

  1. “Customer Centricity”: Focusing our actions on our customers;
  2. “Collaboration”;
  3. “Continuous Improvement”: Continuous Improvement;

Community working groups managed by employees themselves met in the first half of 2018 to make progress on these themes and propose initiatives.

A new “Axwegian’s Voice” survey took place mid year, and a particularly high participation rate was achieved again -72%.

A complete summary of the results was shared with teams through internal messaging, in-house social network blogs and roadshows involving managers and members of the Axway Executive Committee.

Providing employees with the best possible working conditions

In a company where human capital is vital, the well-being of each employee is essential. Other than the ethical expectations mentioned above, work-life balance is important to each person.

Working time and pace

For each of its subsidiaries, Axway complies with its legal and contractual obligations concerning working time. The working time depends on local requirements and activities. For example, in France, Axway Software SA implements the French National Collective Agreement for technical design and engineering offices, engineering consultants and consulting firms.

In 2018, 2% of Axway Group employees worked part-time, mostly within the scope of parental leave.

Home Office

A “Home Office” Group agreement allowing remote working was signed in 2018, allowing employees to work at home or in a private space 5 times a month (day or half-day).

The Home Office system is supported by collaborative tools accessible to all employees: web conferencing, sharing secure data, in-house social network. It also encourages improved professional travel management through remote meetings.

Additional leave

Additional leave is granted according to several criteria: length of service, age, family situation or private events in order to improve each employee’s work-life balance.
Absenteeism at Axway

Absenteeism is very low at Axway and linked to family events such as maternity/paternity and adoption.

<table>
<thead>
<tr>
<th>Reasons for absenteeism</th>
<th>% absenteeism</th>
</tr>
</thead>
<tbody>
<tr>
<td>Illness</td>
<td>1.07%</td>
</tr>
<tr>
<td>Occupational/commuting accident – occupational illness</td>
<td>0%</td>
</tr>
<tr>
<td>Maternity – adoption</td>
<td>1.16%</td>
</tr>
<tr>
<td>Family events</td>
<td>0.11%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>2.42%</strong></td>
</tr>
</tbody>
</table>

Health and safety

Axway is committed to providing its employees with a safe and healthy workplace. Health and safety are vital concerns. For several years now, Axway has implemented a well-established health and safety policy. At Axway Software SA, a Health, Safety and Working Conditions Committee helps coordinate this policy, in close collaboration with occupational doctors and site managers. In 2018, the committee met eight times.

Beyond regulations, the collaborative working model adopted by Axway is accompanied by careful attention to premises where employees work and meet in welcoming, sometimes fun places and shared time linked to unified themes.

Attractive financial and social conditions

The Axway compensation policy reflects the Group’s industry in each country as well as the evaluation of each employee’s performance and career development.

In 2018, as every year, Axway paid salary increases on an individual basis.

Profit sharing

Every Axway Software SA employee benefits from a profit-sharing agreement as well as a Company Savings Plan. A new incentive agreement was signed for the 2018-2020 period.

Social welfare schemes

In accordance with each country’s laws and customs, Axway also takes part in retirement and pre-retirement schemes, as well as occupational-insurance schemes covering its employees for various additional contingencies.

Workplace equality

Axway does not discriminate during recruitment, and deploys a policy in favour of diversity with several aspects described below.

Encouraging female engineers and digital workers

In 2018, 31.89% of new employees were women.

In France, whilst the number of female graduates from engineering schools increased slowly (29% in 2015 vs. 22% in 1995), the Observatoire des femmes ingénieurs (Female engineers observatory) indicates in its latest study that young girls and women are disinterested in digital jobs, which is underlined by the fact that there are fewer than 10% women. Thus 20% of IT engineers and study, research and development managers are women, and only 16% of IT study and development technicians are women.

The average number of girls in digital education schools and establishments was assessed at around 15%.

The Digital sector now has 33% women in its workforce, vs. 53% for all business sectors. This gap increases further if looking at more technical profiles (source: Talents du Numérique).

The profession is facing a female recruitment crisis. However, at Axway, the proportion of female engineers recruited is higher than the percentage of women graduating from engineering schools.

Axway takes part in awareness programmes with young girls to attract new candidates into engineering and technology.
**Senior employability**

Across the entire Group, Axway does not discriminate based on age when recruiting, welcoming both young people and seniors to the company and working on their employability during their career at Axway.

For employees already in a position, a professional interview is held every 2 years to look at career monitoring, training requirements, etc.

See also recruitment figures in this chapter.

**Employment of people with disabilities: raising awareness and understanding**

A Disability unit (Mission handicap) at Axway is responsible for pooling the programme carried out with Sopra Steria. Awareness activities such as the Handigital week and Handidays help combat misconceptions which often pit performance and disability against each other.

In 2018, Axway teams were able to attend an event on 23 November 2018 with Dorine Bourneton, the first disabled female aerobatics pilot in the world, to tell them about her experience. More generally, every Axway site has a disability officer who is responsible for supporting employees who are personally or indirectly dealing with disability. Axway also offers assistance when submitting a disabled worker recognition file but also offers “family caregiver” status to employees dealing with disability in their family.

Furthermore, Axway implements a strict equality policy in terms of compensation and access to training.

**Recognising and celebrating employee loyalty**

Each year, employees’ career milestones are celebrated for 3, 5, 10, 15, 20, 25, 30 and 40 years of service.

**Interacting internally through Axwegian communities**

A genuine everyday tool for exchanges between employees, the Axway in-house social network can be accessed anywhere on a computer, tablet or smartphone. It is aimed at all employees and it is the company’s internal space for discussions.

Organised by spaces and communities, it offers all social network services: internal resources, HR information, Group tools, instant messaging, customer directory, product catalogue, etc.

Several spaces are dedicated to life at Axway: projects completed together, CSR initiatives, social events, testimonials.

The Griffin Digest: The Friday in-house e-newsletter.

Sent to every employee every Friday, the in-house e-newsletter contains Group news, information about projects, documents and blogs available on the company social network. It is published in English and French.

**The internal mobility policy, a source of motivation**

In response to expectations expressed by employees during the first in-house surveys, Axway pursued its internal mobility policy in 2018. This policy is disclosed to managers and all Axway employees and it is made up of several systems.

All job adverts (excluding exceptionally confidential jobs) can be viewed by all employees. By visiting the Pulse Career in-house social network Make your Move (or MY Move), employees can view all adverts by using an application management tool, iCIMs.

The mobility policy and the rules – a more dynamic way to present internal mobility standards - are available in various formats and distributed on a regular basis. 326 employees changed positions internally during 2018. In addition, we use this same social network to invite employees to promote open positions at Axway in their own network, using a co-option programme.
Developing talent

Self-assessment to move forward

For several years, Axway has implemented an employee assessment and progression system based on skills development and reaching defined objectives.

The assessment system for each employee operates under the responsibility of line managers and 100% of employees who are present must have an annual appraisal.

Preparation for the interview is coordinated by the Human Resources Department, which provides the schedule, key dates and interview tools. Each employee is invited to prepare for the interview with their line manager.

The annual interview is organised around two areas: evaluating assignments completed during the year based on objectives defined at the start of the year, the employee’s thoughts on the year and their projects, areas for progress or development, and jointly defined objectives for the following year.

Axway University

Each year, Axway invests in skills development, and a dedicated team creates the training required for new skills.

In 2018, new programmes were proposed to support implementation of the Axway strategy in the development of its offers and new required skills. These programmes include:

- sharing the Axway detailed strategy, with 207 people;
- understanding the new subscription model, with 145 people;
- becoming a Trusted Adviser, training for sales teams: with 123 people;
- discovering the Amazon Web Services (AWS) module, with 124 employees;
- informing about “It’s all about respect” for 242 employees in the United States;
- better grasping the Integration Platform as a Service (iPaaS), for 152 people;
- mastering the basics of API, 175 people;
- exploring micro-services, 163 people.

The online training platform and the “on demand” content allows employees to select their training as they need it.

In total, 36,934 training hours have been given in 2018 (vs. 34,272 the previous year) for 17,035 trainees.

Succeeding thanks to customers

The adoption of Axway solutions by the customer is Axway’s core business. Like all Axway employees, new employees benefit from this customer-focused culture in all projects in which they are involved.

If they do not work directly with customers, they will benefit from customer feedback through constant monitoring of “customer centric” customer satisfaction for all Group activity.

This customer experience significantly improves professional skills beyond training.

Customer satisfaction

Due to the emergence of new subscription models, Axway has also implemented a training module dedicated to the Net Promoter Score (NPS) to ensure company efforts are aligned with this core theme. No fewer than 1,165 employees were trained.

(1) Net Promoter Score: customer satisfaction measurement tool.
2. Ethical and environmental responsibility in Axway's business

Axway developed an internal network of correspondents in its main countries of operation to collect environmental data regarding energy consumption, recycling and charitable initiatives. This network is key. It allows information feedback at Group level and adjustment of resources based on requirements and the areas in question.

The network of correspondents covers the following countries: France, United States, Germany, Bulgaria and Romania.

Ethics and initiatives

Axway has decided to work both on an ethics programme which creates value for the entire Group, as well as local initiatives in response to specific requirements in each country.

The ethics programme: trust in our business relationships

The Group has implemented tools to ensure respect of key values with regards to the different stakeholders with which it interacts on a daily basis.

As part of its review, Axway designed a reference of key values shared on a daily basis, both by its employees in a broad sense, as well as its stakeholders: customers, shareholders and its service providers.

The Ethics charter is applicable to employees as well as stakeholders with which the Group works on a daily basis. It aims to promote key values for the Group as part of its activities. This charter underlines human values and the legal arsenal linked to the protection and respect of these values to ensure fair treatment of all stakeholders.

The Group has demonstrated the principles underlying this charter through specific examples. As part of e-learning, Axway wanted to continue the implementation and consideration of specific examples to help people to understand this charter. An "ethics" e-learning programme was implemented and completed by 1,919 employees in 2018. The Group's objective is that this e-learning is completed by all employees. Automatic reminders are sent if this training is not completed.

In order to protect its key values, the Group has also implemented a whistle-blowing system to underline the effectiveness of its key values.

Anti-corruption: In addition to this charter, Axway has adopted an active anti-corruption initiative. The Group abides by the United Nations Convention of 31 October 2003 against corruption, and is committed to applying prevailing laws, including anti-corruption laws, particularly the Sapin 2 law. The Group has taken all provisions to respond and develop its code of conduct in this sense.

Duty of care: As part of its responsible procurement policy, Axway fulfils its duty of care by asking its suppliers to provide attestations that prove that they prohibit concealed employment and child labour and they meet their obligation to hire disabled workers.

In 2018, Axway continued its initiative relating to the social & solidarity economy, by contracting with the adapted company, the "protected workshop" for the purchase of office furniture.
A recognised platform for customers

In 2018, Axway had its corporate social responsibility approach evaluated by the EcoVadis platform to encourage transparency and trust by customers and business partners. The Silver rating obtained last year was confirmed again this year.

Bringing employees, process, and platform together, EcoVadis has implemented a broad-spectrum CSR assessment methodology covering 150 purchasing categories, 110 countries and 21 CSR indicators. This is the first collaborative platform evaluating suppliers’ sustainable development performance for global supply chains. EcoVadis has become a trusted partner for buyers at a significant number of multinational companies.

Co-innovation

There have been an increasing number of co-development or co-innovation projects bringing together a customer, a partner and a civil society organisation. The development of mobile apps to which Axway contributes by providing data helps offer new services to users.

Axway contributed to the City-Data Info-Travaux programme with the mayor of Paris and several companies and start-ups, which aims to improve the daily lives of citizens.

A responsible index with investors

After three years of contribution and the implementation of a data collection system, Axway joined the Gaia index in 2017. Gaia selects 70 companies from the 200 companies listed on the French stock market based on CSR criteria: social, environmental and governance. This index, recognised in the financial markets, enables investors to evaluate general company performance beyond financial criteria, and to promote responsible investment.

With Partners and Suppliers

Axway applies ethical rules and anti-corruption rules to its partners:
- technology partners for data hosting, technology integration and software co-creation;
- business partners in the areas of advice and integration, or the resale of its solutions.

Each year, Axway surveys partners as part of its “Net Promoter Score” satisfaction survey that enables partners to voice their satisfaction of their relationship with Axway.

The Group prioritises service providers with a responsible approach to business.

Local initiatives in civil society and for environmental protection

Approaches and initiatives are not standard at Group level. Employees have significant independence in their choice of CSR initiatives in order to respond locally to requirements in countries where the subsidiaries are located.

For this 2018 report, we thought it was important to highlight Axway employee initiatives. These employees have not only dedicated resources but also their own personal time.

Whilst these approaches are independent, they reflect the Group’s spirit and values.

In Bulgaria

- Sveti Nikola Foundation: Axway volunteer employees collect clothes, books and toys for children.
- To raise awareness of the impact of human activity on natural resources, employees have set up awareness workshops relating to (i) recycling and combating clothing waste and (ii) training and workshops to raise awareness of Pletchica “Zero waste”.
In the United States

- American employees decided to set up a blood drive. This initiative is in collaboration with Vitalant (FKA United Blood Services).

In France

- The FACE foundation Wi-Filles programme was chosen to support the digitisation campaign with individual Axway shareholders. Wi-Filles is a programme to introduce young girls between 14 and 16 years old to digital uses, jobs and skills. It encourages young girls to further their understanding of a future with digital, develop their independence and their ability to act and to make them leaders in their education and career. (https://www.fondationface.org/projet/wi-filles/)

- “Elles bougent”, which promotes female engineers who pass on their passion and generate interest in the career. Five employees, sponsors and representatives take part in Elles bougent events.

- ADIE: 5-year partnership with ADIE (non-profit association) to which Axway supplies software. This association helps people marginalised in the labour market (without access to a traditional banking system) to set up businesses, and thus create their own jobs, via the use of microcredit.

In Ireland

- For the elderly: employees decided to promote a communication programme through which they help the elderly to look after their garden and go shopping. The objective is helping to maintain a social link between generations on a daily basis.

- Women ReBOOT is an Irish initiative aimed at experienced and qualified women in the information technologies sector who have taken a career break. Axway Ireland supports this initiative, and during the Women Hack Dublin event in November 2018, it was able to get into contact with talented women with the required skills for the jobs on offer.

In Romania

- Aura Ion: Christmas gift donations for underprivileged families, particularly in rural areas, via this association, which provides help and support to children and the elderly.

At a Group level, Axway is involved with the Malala Fund: during International Women’s Day, Axway employees supported the Malala Fund for Education created by the Nobel Prize-winning activist Malala, in order to raise public awareness of the benefits of providing girls with the same access to education as boys worldwide. 7,000 euros were raised.
Acting eco-responsibly

Raising employee awareness of environmentally-friendly actions: the network of correspondents

Axway encourages its employees to play a key role in the eco-responsibility process in order to raise awareness of environmental challenges. Axway encourages employee environmental protection initiatives and promotes the avoidance of excess consumption of non-renewable energy resources in our working methods.

Axway is committed to an environmental policy promoting eco-responsible practices within the Company, developing initiatives and leading actions to support this approach.

Software publishing is not an industrial activity. It does not directly release waste into the air, water or soil. It does not use water or resources considered fragile. It does not really present any direct risks to the environment.

Nevertheless, Axway is committed to preserving the environment. Through its locations in 17 countries, and its teams working across the world where its customers are located, Axway has always encouraged the use of video conferencing. Investments in audio/video equipment, messaging platforms and shared tools encourage team communication whilst protecting the environment by limiting travel.

The need to control our environmental impact is therefore covered by a continuous improvement program that specifically involves the relevant functional divisions, employees, service providers and shareholders.

Audio-conferencing is now widely used within the Group.

Furthermore, to reduce daily document printing, the Docusign electronic signature tool installed in 2016 is now systematic and its use multiplied fivefold between 2016 and 2018, i.e. 3,487 uses in 2018 compared to 719 in 2016.

Controlling our direct ecological footprint

As a tenant at all its sites, Axway seeks to optimise the energy performance of its facilities. These were therefore equipped with modern environmentally-friendly heating and air-conditioning systems when existing systems require replacement. The French headquarters located in Paris La Défense benefit from La Défense’s highly environmentally-friendly air conditioning and heating system which uses the county’s waste. The latest technologies are used, such as timers to switch off lights, reduce heating, and air conditioning outside of working hours; radiant ceiling panels with an individual control option; the use of LEDS and motion sensors to switch lighting on or off, combined with individual remote controls to adjust intensity. Preventive installation maintenance operations help guarantee their performance in the long-term. In 2018, a new fluid exchange system (iced water) was installed at Tour W, resulting in considerable energy savings.

This desire to control our consumption and reduce our impact on the environment is extended to our suppliers. Site managers are encouraged to implement best practices in this topic. Axway has a proactive policy of working with suppliers who offer eco-responsible products for purchases of consumables, office equipment and IT hardware. It also asks cleaning service providers to use non-toxic and non-hazardous products.

Axway’s activity generates waste with a high recycling potential. It mainly includes paper and cardboard as well as computer consumables. For this reason, the Group has chosen a supplier who ensures collection for recycling of cardboard, paper, plastic, cans and printer cartridges. The supplier does both regular and one-off collections. Voluntary collection points have also been installed.

Concerning waste electrical and electronic equipment (WEEE), Axway is pursuing its global policy of waste recycling, particularly through the use of competent service providers.

In 2018, in France, Axway recycled 1,037 kg of WEEE, 610 kg of plastic, 475 kg of cartridges and 9,799 kg of paper/cardboard.

The company canteen is also committed to an environmentally-friendly approach, with the collection and recovery of biowaste.

New ergonomic workstations improve the working conditions of employees, but also optimise their energy and resource consumption, with low-power laptops, adhesive walls and whiteboards which consume less paper.
Climatic impact of the Group’s operations

During the 2018 fiscal year, the Axway Group decided to step up its environmental-protection approach via a network of internal local correspondents in the countries deemed key to collect environmental data on energy consumption relating to fuel, electricity, gas and water.

Axway Group carbon assessment (Bilan Carbone®)

It was decided to establish a greenhouse gas emissions account (BEGES) using the Ademe carbon assessment (Bilan Carbone®) methodology, in order to measure the impact of the Group’s activity on the environment.

The countries included in the scope of the Greenhouse Gas Emission account (BEGES) are France, Germany, Romania, Bulgaria and the site at Phoenix, USA.

The following should also be kept in mind:
- in France, the Annecy site was viewed as negligible and since the heating-energy consumption at the Lyon site is included in service charges, this data could not be retrieved; and
- for the Phoenix site, only the electricity consumption data could be obtained.

The scope as described above accounts for 80% of the surface area of premises and 76% of personnel for the consolidated group.

The BEGES was completed by an independent service provider with a Bilan Carbone® licence issued by the Association Bilan Carbone (ABC) for 2019. The GHG emissions account (BEGES) was drawn up on the basis of the updated official greenhouse gas emissions assessment in accordance with version 4 of the assessment production methodology published in July 2015 by the French Ministry for the Ecology, Sustainable Development and Energy.

The findings of the report are:
- direct greenhouse gas emissions in CO₂ metric ton equivalents came to 287 (t eq. CO₂);
- indirect GHG emissions associated with the production of electricity, imported steam or heat amounted to 1,408 CO₂ metric ton equivalents (t eq CO₂); and
- other indirect greenhouse gas emissions amounted to 184 CO₂ metric ton equivalents (t eq CO₂).

Thus, total greenhouse gases emissions by the Axway Group within the scope defined above totalled 1,879 (t eq. CO₂).

The 2017 assessment was updated with updated emission factors, as recommended by the Ministry in their methodology. Greenhouse gases therefore increased 18% between 2017 and 2018. This increase is linked to more stable use of the La Défense building (more precise consumption meters, use of spaces for a full year in 2018, unlike in 2017).
A breakdown of greenhouse gas emissions (GHG) is presented below:

**GHG EMISSIONS BY SCOPE (in t eq. CO₂ and as %)**
- 75% Indirect energy-related emissions
- 10% Other indirect GHG emissions
- 15% Direct GHG emissions

**BREAKDOWN OF GHG EMISSIONS BY COUNTRY (in t eq. CO₂ and as %)**
- 29% USA Phoenix
- 24% Bulgaria
- 17% Germany
- 16% Romania
- 14% France

**BREAKDOWN PER M² AND PERSON FOR EACH COUNTRY**
- **USA Phoenix**
  - 0.090 t eq. CO₂/m²
  - 0.036 t eq. CO₂/person
- **Romania**
  - 0.104 t eq. CO₂/m²
  - 0.117 t eq. CO₂/person
- **Bulgaria**
  - 0.179 t eq. CO₂/m²
  - 1.916 t eq. CO₂/person
- **Germany**
  - 1.523 t eq. CO₂/m²
  - 3.333 t eq. CO₂/person
- **France**
  - 0.502 t eq. CO₂/m²
  - 0.502 t eq. CO₂/person
Axway continued to apply the best practices already in place for several years, particularly by taking the following measures:

- more widespread use of conferencing facilities (Webex and SkypeTeam) in order to limit travel;
- over the last three years, the Car Policy has set a maximum CO₂ limit of 130g.
Donations of equipment

Axway donates equipment to employees. This year in Europe, around 192 various pieces of equipment (work stations, servers, monitors and peripherals) were donated to schools and humanitarian associations.

Eco-responsible actions with respect to the shareholders

By involving investors and shareholders upstream, the Axway Group also hopes to increase their awareness of the environmental difficulties encountered by the Group, both in its business operations and its daily resource management. By implementing different processes, the Company is able to reduce paper consumption, the transport necessary for sending by mail, and consequently, its CO₂ impact and more globally its annual environmental impact.

Individual shareholders:
1 e-mail = 1 tree planted program

In 2018, Axway continued its digital document campaign with individual shareholders: “1 e-mail = 1 tree planted”. This initiative aims to limit printing, notably when preparing and holding the General Meeting. Hence, in 2018, the printing of 14,880 sheets of paper was avoided and replaced by sending documents for the General Shareholders’ Meeting by e-mail.

At the end of 2018, 49% of Axway shareholders had agreed to receive documents by e-mail. Those who agreed to provide their personal e-mail address received a certificate for the planting of a tree in the Amazon in exchange for their consent to digitised exchanges. Axway takes part in the Alto Huayabamba reforestation program in Peru, a PurProjet organisation.

This is a small “sprout” which will gradually replace the considerable volume of documents exchanged.

During the 2018 General Meeting, Axway offered a small traditional gift to participants: a Goby Label bottle; encouraging them to reduce the number of plastic bottles used when travelling.

Internet voting for shareholders:
the Vote Access website

In 2018, the Axway Group also provided individual shareholders with access to online voting. This online voting site enables them to vote for resolutions at the General Shareholders’ Meeting and to consult all the regulatory documents made available in digital version. This new procedure helps to limit the exchange of paper mails between the Company and its shareholders under the postal voting system.

Digital tools for investors: website and mobile applications

Relations with investors are based upon individual meetings, forums, road shows and conferences. They represented 271 meetings in 2018. Each of the contacts was asked to download Axway’s PDF presentation from the Investors website or the Axway IR mobile application. These paper and document transport savings were well received by investors and financial investors.
Methodology note

Scope of consolidation for employee data, health and safety data, indicators, and reporting method and systems.

Human Resources information

Consolidation scope

The workforce shown in the “Workforce” and “Breakdown of Workforce by Geographical Area” tables corresponds to the total number of employees at 31 December 2018.

Indicators

The indicators chosen are those used for personnel management and the Group’s employee-related issues. They reflect the results of the Human Resources policy.

Data

For the scope defined, the data stems from country-specific reporting and the reporting produced by the divisions concerned. A continuous improvement process has been set up for those systems.

Methodology note (HR Section)

Information provided about Axway Software SA concerns France. The indicators used are those of the French Grenelle II Act. The principle of consistency of accounting methods year-on-year is respected. The data was collected from the counties concerned.

Relations with employees

Axway Software SA

At Axway Software SA, employer-employee dialogue hinges on a Plant Committee, a Health, Safety and Working Conditions Committee, employee representatives and three Trade Union Representatives (CGT - CFDT & TRAID UNION).

Labour relations at Axway GmbH

At Axway GmbH employer-employee dialogue takes place through four Plant Committees and a Central Works Council.

Overview of collective agreements

Within Axway, 70 agreements were in force at 31 December 2017. In 2018, 23 agreements were signed in France and seven were signed in Germany.

The collective agreements signed at Axway Software SA in 2018 are the following:

- Home Office agreement;
- Agreement promoting professional equality between men and women;
- Amendment no. 1 to the agreement on change management at the Annecy site;
- 2018-2020 incentive agreement;
- Agreement promoting employment of disabled workers;
- Amendment no. 3 to the agreement on travel expenses.

The following collective agreements were signed at Axway GmbH in 2018.

8 agreements were signed in Germany with the Works’ Council:

- Home Office Agreement;
- Sales Policy & Plans;
- Bonus Plans;
- Planning Tool;
- Security Operation Planer (SOC);
- Salary increase process (3 locations);
- Lumaps;
- Office 365.
Health and safety information

Consolidation scope
The safety indicators concern all Axway sites.

Indicators
The indicators chosen are those used for the management of Axway sites. They reflect the results of Axway’s policy regarding the environment, health and safety.

Data
This year’s health and safety information was collected by the site managers for Axway Software SA.

A continuous improvement process has been set up for those systems.

Health and safety conditions at Axway Software SA
In 2018, the CHSCT (Health, Safety and Working Conditions Committee) held eight meetings.

During this period, there were:
- 2 lost time injuries;
- 5 commuting accidents, including 4 with lost time.

Measures taken to improve safety:
- Preserving the health and safety of employees is a fundamental goal and an integral part of the Human Resources and social policy;
- The health and safety procedures are part of an overall procedure conducted in close collaboration with the occupational health doctors, site managers and CHSCT.

Summary of collective agreements concerning health
No agreement has been signed in this regard.

Occupational health doctors
In Germany, like in France, an occupational health doctor performs employee check-ups on a regular basis.

Awareness-raising actions were conducted at French sites concerning on-screen work. In addition, Axway Software called in an ergonomist to carry out work on workstation positions.

Programs are being conducted in collaboration with Irish and US governments to promote carpooling and cycling.

Evaluation of psychosocial risks
A steering committee comprised of members from Human Resources and representatives from CHSCT was assembled in 2015 to evaluate psychosocial risks within Axway France. The work resulting from this collaboration made it possible to deploy a questionnaire in January 2016 to employees, aimed at evaluating their work conditions. This survey represents a first step in the eventual identification of psychosocial risk factors, with a view to improving the quality of life in the workplace.
Certificate of disclosure by an independent third-party body

Verifying Auditors’ Report

Year ended 31 December 2018

This is a free translation into English of the Statutory Auditors’ report issued in French and is provided solely for the convenience of English speaking readers. This report should be read in conjunction with, and construed in accordance with, French law and professional standards applicable in France.

To the Shareholders,

Further to a request by Axway Software (hereinafter the “entity”) and in our capacity as an independent third party certified by COFRAC under number 3-1081 (scope available at www.cofrac.fr), we hereby report on the consolidated non-financial performance statement for the year ended 31 December 2018 (hereinafter the “Statement”), presented in the Group management report, in accordance with the legal and regulatory provisions of Article L.225-102-1, R.225-105 and R. 225-105-1 of the French Commercial Code (Code de commerce).

Responsibility of the entity

Pursuant to legal and regulatory requirements, the Board of Directors is responsible for preparing the Statement, which must include a presentation of the business model, a description of the principal non-financial risks, a presentation of the policies implemented in light of those risks and the outcome of said policies, including key performance indicators.

The Statement has been prepared in accordance with the benchmarks used by the entity (hereinafter the “Guidelines”), the main elements of which are available at request at the Company’s registered office.

Independence and quality control

Our independence is defined by the provisions of Article L.822-11-3 of the French Commercial Code and the French Code of Ethics (Code de déontologie) of our profession. In addition, we have implemented a system of quality control including documented policies and procedures regarding compliance with the ethical requirements, French professional standards and applicable legal and regulatory requirements.

Responsibility of the independent third party

On the basis of our work, our responsibility is to provide a reasoned opinion expressing a limited assurance conclusion on:

• the entity’s compliance with other applicable legal and regulatory provisions, in particular the French duty of care law and anti-corruption and tax evasion legislation;
• the consistency of products and services with the applicable regulations.

Nature and scope of our work

We conducted our work in accordance with standards applicable in France determining the conditions in which an independent third party performs its engagement and with the international standard, ISAE 3000.

Our work was conducted between 18 March and 6 April 2019 and took approximately five man-days.

We conducted three interviews with the individuals responsible for preparing the Statement.

Our procedures allowed us to assess the consistency of the Statement with regulatory provisions and the fairness of the Information:

• we obtained an understanding of the activities of all the companies included in the consolidated scope, the description of the labour and environmental risks associated with their activities, and the impact of those risks on compliance with human rights and anti-corruption and tax evasion legislation, as well as the resulting policies and their outcomes;
• we assessed the appropriateness of the Guidelines with respect to their relevance, completeness, reliability, objectivity and understandability, with due consideration of industry best practices, where appropriate;
• we verified that the Statement includes each category of labour and environmental information set out in Article L.225,102(1) III, as well as information regarding compliance with human rights and anti-corruption and tax evasion legislation;

However, it is not our responsibility to comment on:

(1) Axway Software.
we verified that the Statement includes an explanation for the absence of the information required under Article L.225-102-1 III, 2;
we verified that the Statement presents the business model and the principal risks associated with the activities of all the companies included in the consolidated scope, including where relevant and proportionate, the risks associated with their business relationships and products or services, as well as their policies, measures and the outcomes thereof, including key performance indicators;
we verified, where relevant with respect to the principal risks or the policies presented, that the Statement provides the information required under Article R.225-105 II;
we assessed the process used to identify and confirm the principal risks;
we asked what internal control and risk management procedures the entity has put in place;
we assessed the consistency of the outcomes and the key performance indicators used with respect to the principal risks and the policies presented;
we verified that the Statement covers the scope of consolidation, i.e., all the companies included in the consolidated scope in accordance with Article L.233-16;
we assessed the data collection process implemented by the entity to ensure the completeness and fairness of the Information;
for the key performance indicators and other quantitative results that we considered to be the most important, we implemented:
• analytical procedures to verify the proper consolidation of the data collected and the consistency of any changes in those data,
• tests of details, using sampling techniques, in order to verify the proper application of the definitions and procedures and reconcile the data with the supporting documents. This work was carried out on a selection of contributing entities and covers between 20% and 100% of the consolidated data relating to the key performance indicators and outcomes selected for these tests(1);
we referred to documentary sources and conducted interviews to corroborate the qualitative information (measures and outcomes) that we considered to be the most important;
we assessed the overall consistency of the Statement based on our knowledge of all the companies included in the consolidated scope.
We believe that the work carried out, based on our professional judgment, is sufficient to provide a basis for our limited assurance conclusion; a higher level of assurance would have required us to carry out more extensive procedures.
Due to the use of sampling techniques, as well as other limits inherent to the operation of any information and internal control system, the risk of failure to detect material misstatements in the Statement cannot be entirely eliminated.

Conclusion
Based on our work, nothing has come to our attention that causes us to believe that the non-financial performance statement is not in accordance with the applicable regulatory provisions and that the Information, taken as a whole, is not presented fairly and in accordance with the Guidelines.

Lyon, 12 April 2018
FINEXFI
Isabelle Lhoste
Partner

(1) Employment, recruitment, training, general environmental policy, climate change, direct ecological footprint.
## HR and environmental information cross-reference table

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<tr>
<td>GP1 (A.R225-105.1-I)</td>
<td>The NFPS mentioned in part I of article L.225-102:1 and the consolidated non-financial performance statement mentioned in part II of the same article present the company’s business model, or where applicable the business model for a group of companies for which the company prepares consolidated financial statements.</td>
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<td>GP2 (A.R225-105.1-I)</td>
<td>For each information category, they also present: 1. A description of the main risks linked to the company’s activity or the activity of all companies, including when relevant and proportionate, the risks created by its business relationships, products or services; 2. A description of the policies applied by the company or all companies including, where applicable, reasonable due diligence procedures put in place to prevent, identify and mitigate the risks indicated in 1); 3. The results of these policies, including key performance indicators. (Decree of 09/08/2017)</td>
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<td>GP3 (A.R225-105.1-I)</td>
<td>If the company does not apply a policy to one or several of these risks, the statement includes a clear and reasoned explanation of the underlying reasons. (decree of 09/08/2017).</td>
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<td>GP4 (A.R225-105.1-I)</td>
<td>Published information is presented “in a manner to allow data comparison” (Law of 12/07/2010). The Board of Directors or Management Board report “presents data observed during the fiscal year, and where applicable, during the previous fiscal year, in order to compare this data” (decree of 24/04/2012).</td>
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<td>GP5 (A.R225-105.1-II)</td>
<td>When a company voluntarily complies with a national or international reference to acknowledge its obligations in view of this article, it mentions it, indicating the recommendations of this reference which have been selected, and the methods to consult the latter (decree of 24/04/2012)</td>
</tr>
<tr>
<td>GP6 (A.R225-105.1-III)</td>
<td>Without prejudice to the publication obligations applicable to the report as indicated in article L.225-100, these declarations are made public and easily accessible on the company’s website within eight months from the end of the fiscal year and for a period of five years. (decree of 09/08/2017).</td>
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* **GP**: General reporting principles.
The independent third-party organisation mentioned in part V of article L.225-102-1 is appointed, where applicable, by the Chief Executive Officer or the chair of the management board, for a period which cannot exceed six fiscal years, from amongst the organisations accredited for this purpose by the French accreditation committee (COFRAC) or any other accreditation organisation which has signed the multilateral recognition agreement established by the European accreditation organisation coordination. The independent third-party organisation is subject to the incompatibilities indicated in article L.822-11-3.

When the information is published by companies whose thresholds exceed 100 million euros for the total balance sheet or 100 million euros for the net revenue and 500 for the average number of permanent salaried employees during the fiscal year, the report by the independent third-party organisation includes:

a) A reasoned opinion on the statement’s compliance with the provisions indicated in parts I and II of article R.225-105, as well as the honesty of the information provided pursuant to point 3) of parts I and II of article R.225-105;
b) Due diligence to carry out the verification procedure. (Decree of 09/08/2017).

The defined companies which are under the control of a company which includes them in the consolidated accounts pursuant to article L.233-16 are not required to publish a non-financial performance statement if the company which controls them is established in France and publishes a consolidated non-financial performance statement or if the company which controls them is established in another European Union member state and publishes this statement pursuant to the relevant legislation. (Order of 19/07/2017)

For companies whose total balance sheet or revenue and number of employees exceeds the thresholds set by a decree in the State Council, where applicable on a consolidated basis, the information contained in the statements is subject to verification by an independent third-party organisation, based on the terms set in the decree by the State Council. This verification leads to an opinion which is sent to the shareholders at the same time as the report mentioned in the second Section of article L.225-100. (Order of 19/07/2017)

Human Resources Information

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## General reporting principles

### Axway Group NFPS

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## Environmental Information

### General environmental policy

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<th>GP</th>
<th>General environmental policy</th>
<th>Page</th>
<th>Name</th>
<th>Comment</th>
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<tbody>
<tr>
<td>II.a</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>II.a.1</td>
<td>Company organisation to consider environmental issues</td>
<td>Pages 62; 64-68</td>
<td></td>
<td></td>
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<tr>
<td>II.a.2</td>
<td>Environmental evaluation and certification initiatives</td>
<td>Pages 62; 71-72</td>
<td></td>
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<tr>
<td>II.a.2</td>
<td>Resources dedicated to the prevention of environmental risks and pollution</td>
<td>Non-material Non-material</td>
<td></td>
<td>Axway is not affected by this point due to its tertiary activity.</td>
</tr>
<tr>
<td>II.a.3</td>
<td>Provisions and guarantees for environmental risks</td>
<td>Non-material Non-material</td>
<td></td>
<td>Axway is not affected by this point due to its tertiary activity.</td>
</tr>
<tr>
<td>II.b</td>
<td>Contamination</td>
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<tr>
<td>II.b.1</td>
<td>Prevention, reduction, repair measures: AIR</td>
<td>Non-material Non-material</td>
<td></td>
<td>Axway is not affected by this point due to its tertiary activity.</td>
</tr>
<tr>
<td>II.b.2</td>
<td>Prevention, reduction, repair measures: WATER</td>
<td>Non-material Non-material</td>
<td></td>
<td>Axway is not affected by this point due to its tertiary activity.</td>
</tr>
<tr>
<td>II.b.3</td>
<td>Prevention, reduction, repair measures: SOIL</td>
<td>Non-material Non-material</td>
<td></td>
<td>Axway is not affected by this point due to its tertiary activity.</td>
</tr>
<tr>
<td>II.b.2</td>
<td>Consideration of any form of contamination specific to any activity, notably sound and light disturbances</td>
<td>Non-material Non-material</td>
<td></td>
<td>Axway is not affected by this point due to its tertiary activity.</td>
</tr>
<tr>
<td>GP</td>
<td>General reporting principles</td>
<td>Page</td>
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<td>Comment</td>
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<tr>
<td>II.c)</td>
<td>Circular economy</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>II.c)i)</td>
<td>Waste prevention and management</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>II.c).i)</td>
<td>Measures of prevention, recycling, reuse, other forms of recovery and disposal of waste</td>
<td>Pages 64-68</td>
<td></td>
<td>The La Défense facilities (France) have a canteen which is committed to combating food waste. (1)</td>
</tr>
<tr>
<td>II.c).i)</td>
<td>Actions in the fight against food waste</td>
<td>Non-material</td>
<td>Non-material</td>
<td></td>
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<tr>
<td>II.c).ii)</td>
<td>Sustainable use of resources</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>II.c).ii)</td>
<td>Water consumption</td>
<td>Non-material</td>
<td>Non-material</td>
<td></td>
</tr>
<tr>
<td>II.c).ii)</td>
<td>Water supply in keeping with local constraints</td>
<td>Non-material</td>
<td>Non-material</td>
<td>Axway is not located in countries where water use is restricted.</td>
</tr>
<tr>
<td>II.c).ii)</td>
<td>Raw material consumption</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>II.c).ii)</td>
<td>Measures taken to improve efficiency in use</td>
<td>Non-material</td>
<td>Non-material</td>
<td>Axway only uses paper and office supplies for its tertiary activity.</td>
</tr>
<tr>
<td>II.c).ii)</td>
<td>Energy consumption</td>
<td>Pages 64-68</td>
<td></td>
<td></td>
</tr>
<tr>
<td>II.c).ii)</td>
<td>Measures taken to improve energy efficiency</td>
<td>Pages 64-68</td>
<td></td>
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</tr>
<tr>
<td>II.c).ii)</td>
<td>Measures taken to improve the use of renewable energies</td>
<td>Pages 64-68</td>
<td></td>
<td></td>
</tr>
<tr>
<td>II.c).ii)</td>
<td>Soil use</td>
<td>Non-material</td>
<td>Non-material</td>
<td></td>
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<tr>
<td>II.d)</td>
<td>Climate change</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>II.d)</td>
<td>Significant greenhouse gas emissions items generated as a result of the Group's activity, particularly by the use of goods and services it provides</td>
<td>Pages 64-68</td>
<td></td>
<td>Scope: France, Germany, Bulgaria, Romania</td>
</tr>
<tr>
<td>II.d)</td>
<td>Adaptation to consequences of climate change</td>
<td>Non-material</td>
<td>Non-material</td>
<td>Axway is not directly affected by this point, but its products and services help some of its customers to adapt to climate change (for example: managing the data flows of local authorities to optimise resident multi-modal transport)</td>
</tr>
<tr>
<td>II.d)</td>
<td>Reduction objectives set voluntarily in the medium and long-term to reduce greenhouse gas emissions and resources implemented for this purpose</td>
<td>Pages 64-68</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

(1) The following topics (that must be covered in the NFPS): fight against food shortages, respect of animal well-being and responsible, fair and sustainable food supply are not significant at Axway.
**Societal Information**

**III.a) Social commitments in favour of sustainable development**

- **III.a) 1** Company activity impact in terms of employment and local development
  - Pages 55-56

- **III.a) 2** Company activity impact on local and neighbouring communities
  - Non-material
  - Axway is not affected by this point due to its tertiary activity.

- **III.a) 3** Relations with company stakeholders and dialogue methods
  - Pages 61-63

- **III.a) 4** Partnership and corporate patronage initiatives
  - Pages 62-63

**III.b) Subcontractors and suppliers**

- **III.b) 1** Integration of social and environmental criteria in the Company's purchasing policy
  - Pages 61-68

- **III.b) 2** Importance of subcontracting and consideration, in the relationship with subcontractors and suppliers of their social and environmental responsibility
  - Pages 61-62

**III.c) Fair trade practices**

- **III.c) Measures taken in favour of consumer health and safety**
  - Non-material
  - Axway is not affected by this point due to its tertiary activity. Its products and services have no effect on consumer health and safety.

**Anti-Corruption And Tax Evasion**

**Information About Actions Taken To Promote Human Rights**

- **V.a) Promoting and abiding by the stipulations of the international labour organisation's (ILO) fundamental conventions**
  - Pages 53; 61

  - **V.a) 1** Freedom of association and the right to collective bargaining
    - Non-material
    - Non-material

  - **V.a) 2** The elimination of discrimination in employment and occupation
    - Non-material
    - Non-material

  - **V.a) 3** Elimination of forced or compulsory labour
    - Non-material
    - Non-material

  - **V.a) 4** The effective abolition of child labour
    - Non-material
    - Non-material

  - **V.b) Other actions taken to promote human rights**

  - By abiding with the Global Compact, Axway is committed to these topics but it is not located in at-risk countries.