



Corporate Social Responsibility Report

NON-FINANCIAL PERFORMANCE STATEMENT

Extract from the 2021 Universal
Registration Document



This Non-Financial Performance Statement has been issued in the 2021 Axway Universal Registration Document the 24th of March 2022.

Corporate responsibility

NON-FINANCIAL PERFORMANCE STATEMENT

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A word from Management



“Thanks to the transformations undertaken since 2018, Axway's business model is now based on a solid foundation of recurring revenue, supported by a robust product portfolio.”

Pierre PASQUIER

Chairman of the Axway Board of Directors

To continue evolving and even better meet the critical needs of its 11,000 customers around the world. Axway must once again prove its ability to adapt. While we all hoped for a return to a calmer health and economic situation from 2021, it seems that uncertainty is here for the long term.

Thanks to the transformations undertaken since 2018, Axway's business model is now based on a solid foundation of recurring revenue, supported by a robust product portfolio. Axway's customer satisfaction is at an all-time high and the management team, led by Patrick Donovan, can also count on the unwavering commitment of its 1,700 employees. At the same time, the Company strengthened its corporate responsibility programme this year, integrating it more formally into its governance and setting ambitious non-financial objectives.

Axway must now be able to stabilise a growing and profitable model year after year, in line with its independent project and its historical values. After a second half of 2021 more difficult than anticipated, the 2022 objectives, which foresee a return to organic business growth and a further improvement in profitability, perfectly illustrate this ambition.

A pioneer in its industry, the Company must continue to combine experience with constant agility. After several years of internal transformation, Axway must once again assume a consolidator role in its markets and undertake a strategic refocusing of its product portfolio. The organic development of the Company must be founded on its most successful markets and I will fully support the management team in its external growth approach, which can prove complex in such a competitive environment.

In a world in motion, where change is increasingly rapid, we will strive, in 2022, to maintain a coherent and agile strategic course to support Axway's enlightened development. Being our customers' preferred partner remains our top priority, but we will continue to aim for a model which creates value for all stakeholders in our ecosystem.

In 2021, in an economic and health context that remains highly challenging, I was pleased with our teams' efforts to implement our new strategy.

After the successful transformation plan completed last year, it was important for us to launch a new momentum so as to continue moving forward and allow us to gradually establish the independent, growing, and profitable model we believe in for our Company.

Although we faced unusual buying patterns late in the year that prevented us from achieving our annual growth target, we still had several positive results in 2021.

On the ground, organisational adjustments continued around a more assertive product portfolio management strategy, positioning Amplify, our API platform, as the driver of our future business growth and the primary focus of our investments. The technological excellence of our offering, once again confirmed in 2021 by the most influential market analysts, allows me to reiterate my full confidence in this strategy.

Over the past two years, thanks to Amplify and our most important historical products (MFT, B2B-EDI, Digital Finance), our sales teams were able to meet or exceed their targets for seven consecutive quarters before the challenges faced at the end of 2021.

The continuous growth of our Net Promoter Score has confirmed the high level of satisfaction of our customers. More than ever, our customers trust us to guide them through the evolution of their most complex software

infrastructures. By choosing Axway, they benefit from one of the most comprehensive catalogs of offerings on the market, enabling them to turn their digitalization into a major competitive advantage through rapid and effective operational benefits.

This year, we have also succeeded in maintaining strong commitment among our employees despite the high turnover rates observed in our markets. We strive to maintain a transparent and regular dialogue with our teams to ensure that the relationship of trust we have established with them since 2018 continues. In this way, at the beginning of 2022, more than 1,000 employees who have been loyal to Axway for more than 3 years became shareholders in the Company.

Finally, we have taken new key steps in structuring our CSR programme and our corporate responsibility policy by defining more precise, well-defined non-financial objectives in line with our values and long-term ambitions.

We therefore begin 2022 with determination, ready to meet the challenges of a market characterised by limited visibility and strong competition, relying on the solid foundations we have built in recent years to best serve the interests of our stakeholders, including our Employees, Customers and Shareholders.

"More than ever, our customers trust us to guide them through the evolution of their most complex software infrastructures."















Patrick DONOVAN
Axway Chief Executive Officer



Governance

Axway's governance is founded on the sharing of powers between the Board of Directors and the Executive Committee, in accordance with the recommendations of the Middlednext Code.

Board of Directors

| | | Age | Nationality | Number of offices in other listed companies | Audit Committee | Appointments, Governance and Corporate Responsibility Committee | Compensation Committee | General Meeting date of expiry of term of office | Shares in the Company held personally |
|-----------------------------|---|-----|------------------|---|-----------------|---|------------------------|--|---------------------------------------|
| Pierre Pasquier |  | 86 | French | 1 | | ■ | | 2023 | 0 |
| Kathleen Clark Bracco |  | 54 | American | 1 | | ■ | ■ | 2023 | 7,355 |
| Pierre-Yves Commanay |  | 56 | French | 0 | | ■ | ■ | 2022 | 2,816 |
| Hervé Déchelette |  | 76 | French | 0 | ■ | ■ | | 2023 | 22,734 |
| Nicole-Claude Duplessix |  | 62 | French | 0 | | | ■ | 2025 | 1,540 |
| Emma Fernandez |  | 58 | Spanish | 1 | | | ■ | 2023 | 0 |
| Michael Gollner |  | 62 | American British | 1 | ■ | | | 2025 | 100 |
| Helen Louise Heslop |  | 52 | British | 1 | ■ | | | 2023 | 0 |
| Pascal Imbert |  | 63 | French | 1 | | ■ | ■ | 2023 | 340 |
| Véronique de la Bachelerie |  | 62 | French | 0 | ■ | | | 2023 | 0 |
| Yann Metz-Pasquier |  | 33 | French | 0 | ■ | | | 2022 | 11,877 |
| Marie-Hélène Rigal-Drogerys |  | 51 | French | 1 | | | | 2022 | 0 |
| Hervé Saint-Sauveur |  | 77 | French | 0 | ■ | | | 2023 | 900 |
| Yves de Talhouët |  | 63 | French | 0 | | ■ | ■ | 2023 | 0 |

■ Chairman ■ Member ■ Independent Directors

Main topics covered in 2021

- Corporate strategy and associated budget;
- Approval of the financial statements;
- Quarterly results and related financial reports;
- Deliberations on workplace and wage equality;
- Social and environmental responsibility objectives;
- Composition of the Board and its committees;
- Procedures of the Board of Directors: amendment of the internal regulations and the self-assessment questionnaire;
- In-depth implementation of the ethics and anti-corruption internal systems;
- Qualification of directors as independent;
- Company officer compensation;
- Grant of free shares to employees;
- Legal monitoring: EU Green taxonomy, Middlednext code update.

Further information can be found in Chapter 4 of the 2021 Universal Registration Document.

14
members

4
nationalities

64%
independent directors

43%
women

6
meetings

98.8%
attendance

Executive Committee



Patrick Donovan
Chief Executive Officer
USA - France



Roland Royer
Chief Customer
Officer - USA



Cécile Allmacher
Chief Financial Officer
France



Vince Padua
Chief Technology
& Innovation Officer - USA



Marc Fairbrother
EVP Research & Development
UK



Paul French
Chief Marketing Officer
USA



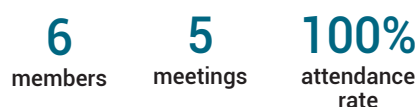
Rahim Bhatia
EVP Product Management
Canada



Dominique Fougerat
EVP People & Culture
France



Audit Committee



Among the duties performed in 2021:

- review the financial statements including the green taxonomy;
- review the general risk map;
- monitor internal audit procedures and statutory auditors procedures;
- review insurance and Company's IT security policies;
- supervise and monitor anti-corruption procedures;
- monitor the implementation project for the new financial information system.



Appointments, Governance and Corporate Responsibility Committee

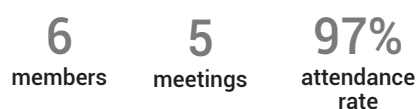


Among the duties performed in 2021:

- assess corporate responsibility commitments, through CSR policy follow-up;
- review the Board and Committees's composition and independence;
- update the Board's internal regulations & Ethics Charter in line with the updated Middennext governance code;
- review and amend the BOD self-assessment questionnaire;
- prepare deliberations of the Board of Directors on professional and employee equality;
- ensure the application and review of the conflict of interest, whistle-blowing and current & regulated agreements procedures.



Compensation Committee



Among the duties performed in 2021:

- prepare the company officer compensation policy;
- propose fixed and variable compensation including non-financial criteria and benefits granted to company officers;
- verify the application of rules defined for calculating variable compensation;
- verify the quality of the information provided to shareholders on compensation, benefits and options granted to company officers;
- prepare the free share grant policy and verify the implementation of related plans;
- prepare decisions concerning employee savings.

Corporate responsibility

Non-financial performance statement **NFPS**

Axway rolls out its Corporate Responsibility policy through three commitments: **Employer, Societal and Environmental**.

In 2021, Axway has positioned CSR in its governance model and defined quantified ambitions, supported by programmes that will be rolled out between 2022 and 2028.

Employer Commitment:

Continue to shape the company we want to work for

Diversity in the workplace

at 31/12/2021

1,712

employees
vs 1,888 in 2020



WOMEN

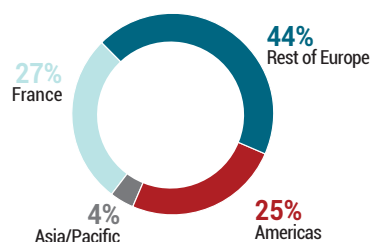
- 30% of total headcount
- 15% of managers

PEOPLE WITH DISABILITIES

- 1.7% of France headcount



EMPLOYEES AROUND THE WORLD



Research & Development
42%
of employees

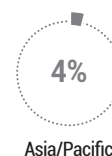
Customer Success Organisation
44%
of employees

Future of Work

- 100% of employees working from home according to their wishes
- 60% Home Office 40% On site

Recruitment

- 204 new employees
- 98% permanent contracts
- 33% women vs. 28% in 2020



Talents development

- 29,915 training hours vs 24,176 in 2020
- 77% training in digital format vs. 93% in 2020

Engagement

Independent employee engagement survey

| | 2021 | 2020 | 2019 |
|---------------------------|------|------|------|
| Participation rate | 79% | 86% | 83% |
| Employee engagement score | 66% | 69% | 58% |

2022-2028

Axway's CSR Targets



Further information can be found in Chapter 3 of the 2021 Universal Registration Document.

EMPLOYER

- Employee Engagement Score >70% for 2022 & 2023
- 33% of women in total headcount by 2023
- +25% of people with disabilities by 2023



Each year, Axway renews its commitment to the United Nations Global Compact

Learn more about the UN Global Compact
www.unglobalcompact.org

Societal Commitment:

Have a positive impact in our communities as a leading software company



ECOVADIS SCORE



STAKEHOLDER RELATIONS

EMPLOYEES

support knowledge sharing initiatives

SHAREHOLDERS

communicate according to transparency best practices

PARTNERS

innovate in responsible values

CUSTOMERS

increase customer satisfaction

SUPPLIERS

progress in Sustainable purchasing

CIVIL SOCIETY

digital development programmes for women
 awareness-raising programmes for the integration of people with disabilities

TOOLS & LABELS

Business ethics

Digital security

Winner of the Transparency award 2021 - Category Hors SBF 120

middlenext



Environmental Commitment: Contribute to climate change mitigation



In 2021, Axway continued to measure and reduce its direct impact...

| Direct Impact | Resources used for our internal activities | Scope 1 | Scope 2 | Scope 3 ⁽¹⁾ |
|--|--|---------|---------|------------------------|
| ...and for the first time, Axway also launched an analysis of its indirect impact. | | | | |
| Indirect Impact | Resources used for our external activities | | | Scope 3 ⁽²⁾ |

(1) Based on the Top 48 suppliers. (2) Based on the Top 4 IT suppliers.

Axway has set the target of achieving carbon neutrality by 2028. This project will involve employees and stakeholders and will be rolled out from 2022. The project is based on 3 levels of action: measuring, reducing and offsetting our impact.



SOCIETAL

- **Net Promoter Score > 40** by 2023
- **Gold EcoVadis ranking** by 2023
- **4 local programmes** in female digital education by 2023

ENVIRONMENTAL

- **10% reduction in paper consumption** in 2022 vs. 2019 (last normal year)
- **2 cyber clean up days** by 2023
- **Carbon neutrality** by 2028

Global Axway CSR internal training programmes



Business Model **NFPS**

Our Mission

Axway enables enterprises to Open Everything by securely integrating and moving data across a complex world of old and new.

INFRASTRUCTURE
SOFTWARE MARKET
TRENDS



CONVERGENCE
OF LEGACY
SYSTEMS
AND NEW
DIGITAL NEEDS

Strengths

PEOPLE

- 1,712 employees, women and men, of all ages, all origins, all countries, all cultures, all educational, professional or life paths

STRUCTURE & GOVERNANCE

- Locations in 18 countries
- Solid financial capacities
- Organic and external growth track record
- Independent enterprise project supported by reference shareholders
- Shared powers between Board & Executive Committee

PRODUCTS

- Robust and diverse products portfolio
- Recognised technological leadership
- Strong innovation investments
- 51 technology patents
- Distribution in 100+ countries

ECOSYSTEM

- 11,000+ customers in 100 countries
- Worldwide partners & suppliers networks
- Diversified minority shareholders base
- Established CSR Commitments

Offers





**RAMP-UP
OF CLOUD
AND SAAS
MODELS**

**CONSTANT
INNOVATION**

**SECURITY
THREATS AND
GREATER
REGULATORY
PRESSURE**

TALENT WAR

**SECTOR
CONSOLIDATION**

Strategy

Value creation

**Technological
excellence &
Portfolio focus**

**Sustained growth
and profitability**

**Reinforced CSR
ambitions**

With our Stakeholders

EMPLOYEES & CANDIDATES

- Employee engagement score of 66%
- 204 recruitments with 98% permanent contracts
- Skills developments with 29,915 training hours
- Open dialogue with management
- Employee share ownership plans

CUSTOMERS

- Best in class products
- Technology agnostic solutions
- Strong security standards
- High satisfaction rate
- EcoVadis silver ranking

SHAREHOLDERS

- Euronext listing
- Middlednext code compliance
- Gaïa rating participation
- Information transparency awards
- Dedicated team and website

PARTNERS & SUPPLIERS

- Ethics tools and whistle-blowing system
- Sustainable purchasing initiatives (in progress)

CIVIL SOCIETY

- UN Global Compact commitment
- Recycling & donation programmes
- Charity initiatives
- Education partnerships
- Carbon neutral programmes (in progress)



Day to day, it is the actions of our employees, as a team, at customer premises and with our stakeholders, that truly embody our Company's commitment.

At Axway, we live Social and Environmental Responsibility as both a moral obligation and a strategic behaviour contributing to the long-term profits of the Company.

In 2021, we strengthened our objectives to promote diversity, increase work flexibility and boost employee satisfaction. These ambitions are all implemented through local programs, broken down in the different countries where we are located.

We have also set an ambitious environmental target of achieving carbon neutrality by 2028. And now we've got the ball rolling. Together - Executive Management, employees, experts, suppliers and customers - we are embracing this vital approach which involves allocating our resources as sustainably as possible.

In these early months of 2022, in an international context which remains turbulent, Axway's commitment as an employer and the opportunities for action undertaken with our employees in Europe, the Americas and Asia, share a common objective: to make Axway a place of sustainable meaning and action.

Dominique Fougerat,
EVP People & Culture at Axway

The new Corporate responsibility markers

2021 will have seen a major step forward in incorporating company and individual commitments to corporate, social and environmental responsibility.

International commitments to combating global warming, the ongoing uncertain health situation, accelerating digital transformation and changing work patterns are affecting citizens and all economic players.

European directives, particularly the new sustainable taxonomy standard, introduce non-financial key performance indicators which have become essential to access business financing and market confidence. These indicators are expected and shared by all Company stakeholders: employees, customers, shareholders, suppliers, partners and societal organisations.

In 2021, Axway strengthened its CSR commitments, setting quantified objectives and a timeline comprising performance measurement indicators monitored by the Company.



Each year, Axway renews its commitment to the United Nations Global Compact, in the areas of corporate, social and environmental responsibility. For more information: <https://www.globalcompact-france.org/participants/3773>

1. Axway, an innovative and responsible player in the digital sector

AFR

As a software publisher Axway supports companies and organisations in their digital transformation. Strongly committed to its stakeholders, Axway discharges its corporate responsibility, including it in its business model, governance and risk management.

In 2021, Axway strengthened its system and launched new programmes covering the three commitments: social responsibility as an employer, societal and environmental responsibility to take into account its climate impact. Axway's CSR key indicators are now deployed in its strategy and monitored in its performance objectives.

Axway's operating context, strategy, risk monitoring and corporate governance are presented in Chapters 1, 2 and 4 of the 2021 Universal Registration Document, and summarised below.

Axway's strategy and business model

The software solutions developed by Axway help modernise the IT infrastructures of companies and organisations by securely transferring, integrating or exposing their data.

Axway has many assets enabling it to innovate and support its customers, and to succeed with its employees:

- constant dialogue with its team members, *i.e.* over 1,700 employees across 18 countries;
- an organisation focused on satisfying its 11,000 customers, measured by the Net Promoter Score (NPS);
- a portfolio of products recognised by market analysts;

- a responsive operational structure supported by a healthy financial position;
- ambitious investments in Research and Development and Sales and Marketing;
- balanced governance and a shareholder structure guaranteeing an independent corporate project;
- strong ethical values, shared with all the Company's stakeholders.

These assets support Axway's ambition to become an independent and committed leader in the infrastructure software market.

Industry context

In the software publishing sector, Axway's human capital and innovative capacity represent major strategic challenges, including:

- talent development and the recruitment of rare and highly sought-after profiles;
- quality of life and a good balance between working on-site and from home, of increased importance with the global health crisis;
- innovation around cloud and SaaS solutions and hybrid offers more broadly;
- changes in digital usage and the need to constantly measure customer satisfaction;
- accelerated data consumption and the need for analysis, monitoring and performance of exchanges;
- Integration of social and environmental responsibility performance objectives in digital activities.



Main risk factors, including non-financial risks

Axway's main financial and non-financial risks are organised into four categories:

- market risks;
- risks relating to the business and organisation;
- security risks;
- legal and compliance risks.

These risks were assessed based on their probability of occurrence and their potential impact on business. The assessment takes into account all mitigation measures already implemented and effective (net risk). For each of these risks, the document describes how it could impact Axway and the risk management systems implemented.

Board of Directors

Chairman
14 members, including 9 independent members;
43% women, 57% men;
3 committees:
• Audit Committee;
• Appointments, Governance and Corporate Responsibility Committee;
• Compensation Committee.
Responsible for defining Axway's strategy.

Axway's governance

Axway's governance is based on a distribution of powers between a Board of Directors and an Executive Committee in agreement with the recommendations of the Middelnext Governance Code to which Axway adheres.

In 2021, Axway modified some of its governance arrangements to comply with the new European directives and the Middelnext Governance Code, updated at the year-end.

New features include:

- publication of the Board of Directors' internal regulations on the Company's website;
- changes to the Appointments, Ethics and Governance Committee to materialise the work of Corporate Responsibility.

Executive Committee

Chief Executive Officer
8 members
25% women, 75% men;
Responsible for executing Axway's strategy.

Axway's corporate social responsibility structure

In support of its stakeholder responsibility policy and in accordance with the recommendations of the Middelnext Governance Code updated in 2021, Axway strengthened its Corporate, Social and Environmental Responsibility (CSR) framework within its governance bodies and teams.

Within the Board of Directors and its committees:

- CSR is included on the agenda of the Appointments, Ethics and Governance Committee, renamed the Appointments, Governance and Corporate Responsibility Committee.

Within Executive Management:

- Patrick Donovan, Chief Executive Officer, leads the CSR policy and defines the roadmap in monthly Committee meetings with the Human Resources Director, Head of Investor Relations and the CSR Coordinator;
- the main social, societal and environmental indicators are included and measured as part of the Company's performance.

With dedicated internal teams:

- **the CSR working group**, in place for a number of years, includes representatives of the Financial Communications, Legal, Human Resources, Pre-sales, Purchasing and IT activities. It drafts and monitors the CSR programmes;
- **the network of correspondents** present in Axway's subsidiaries and responsible for gathering social, societal and environmental data in line with the CSR roadmap.

The Non-Financial Performance Statement (NFPS), an annual statement presenting Axway's CSR policy, programmes, indicators and performance monitoring.

Materiality tools

Axway has implemented processes and tools that are shared with its stakeholders to evidence its commitments:

- ethics and anti-corruption: Ethics charter and Securities Trading Code of Conduct;
- data protection: privacy programmes;
- digital security: charters, standards and internal and external security training programmes;
- customer satisfaction surveys and supplier assessments;
- employee satisfaction independent survey;
- whistle-blowing system;
- Corporate, Social and Environmental performance measurement using ranked indicators, quantified with a timeline;
- materiality matrix for CSR commitments.

Responsible recognition and indices

Each year, Axway renews its commitments with recognised organisations and initiatives, including:

- the United Nations Global Compact since 2016;
- Gaïa rating, the responsible investment stock market index;
- EcoVadis, a global CSR assessment standard;
- Acesia, the AFNOR assessment platform;
- quality and safety standards and particularly ISO/IEC 9001 and 27001, AICPA SOC2.

Reference guide: United Nations Sustainable Development Goals

Axway's three Corporate Social Responsibility commitments - Employer, Societal and Environmental - correspond to 12 of the 17 Sustainable Development Goals - SDGs - defined by the United Nations:

SDG 3 Good health and well-being

SDG 4 Quality education

SDG 5 Gender equality

SDG 8 Decent work and economic growth

SDG 9 Industry, innovation and infrastructure

SDG 10 Reduced inequalities

SDG 11 Sustainable cities and communities

SDG 12 Responsible consumption and production

SDG 13 Climate action

SDG 15 Life on land

SDG 16 Peace, justice and strong institutions

SDG 17 Partnerships for the Goals



Stakeholders in Axway's ecosystem

As a software publisher, Axway is required to interact with numerous stakeholders within its ecosystem: employees, customers, partners, suppliers, shareholders and societal organisations.

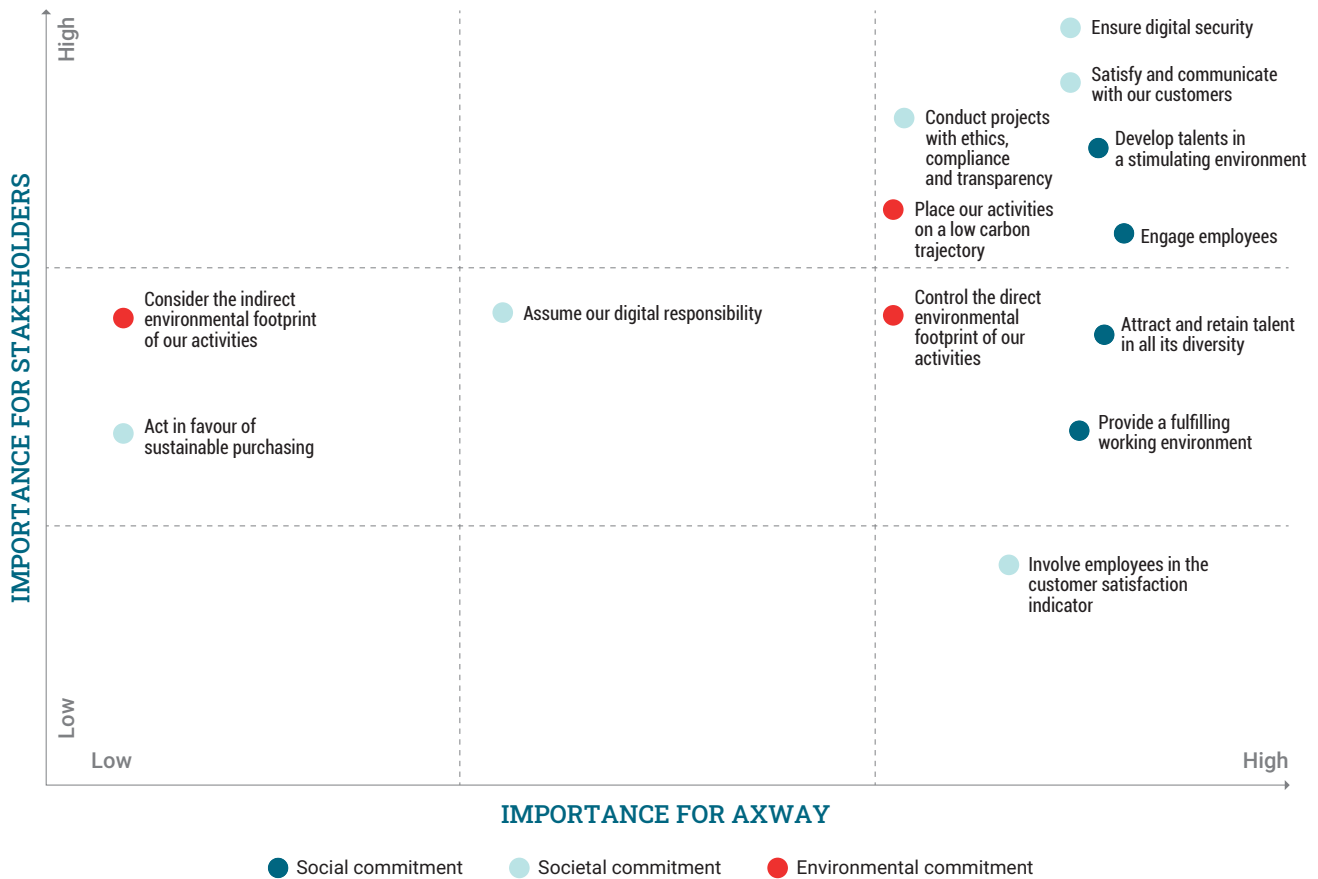
The quality of relations and ethics within this ecosystem have always been core to Axway values.

Ambitions and Commitments

To achieve its ambitions, Axway has defined its main non-financial performance indicators around its three commitments:

| EMPLOYER | SOCIETAL | ENVIRONMENTAL |
|---|--|---|
| <ul style="list-style-type: none"> ■ Employee Engagement Score >70% for 2022 & 2023 ■ 33% of women in total headcount by 2023 ■ +25% of people with disabilities by 2023 | <ul style="list-style-type: none"> ■ Net Promoter Score > 40 by 2023 ■ Gold EcoVadis ranking by 2023 ■ 4 local programmes in female digital education by 2023 | <ul style="list-style-type: none"> ■ 10% reduction in paper consumption in 2022 vs. 2019 (last normal year) ■ 2 cyber clean up days by 2023 ■ Carbon neutrality by 2028 |

Materiality



| Social | Societal | Environmental |
|---|---|---|
| Develop talents in a stimulating environment: training, innovation in working methods and with customers. | Assume our digital responsibility: transfer of usage skills, digital for women. | Place our activities on a low carbon trajectory: measure, reduce and offset the impacts of our activities on the environment. |
| Attract and retain talent in all its diversity: gender, age and disability diversity. Variety of businesses and geographical areas. | Satisfy customers: Customer Success 360° programme and customer satisfaction survey - NPS tool. Innovation, Quality of products and supports, co-design, customer experience, digital sovereignty - ISO 27001. | Control our direct environmental footprint: consumption of internal and external resources (energy, paper, digital exchanges), GHG emission assessment, offsetting |
| Provide a fulfilling working environment: work/life balance, working on-site and from home, internal communication, monitoring psychosocial risks. | Ensure digital security: security of data, activities and digital exchanges in internal applications and the cloud. | Consider our indirect environmental footprint: impact linked to the development and use of Axway's software, including the main suppliers. |
| Engage employees: annual employee engagement survey. | Conduct projects with ethics: governance code, Global Compact commitment. | Compliance with the European Green Taxonomy |
| Inclusion of the NPS customer satisfaction indicator in the compensation policy. | Act in favour of sustainable purchasing: ethical tools integrated into contracts by type of supplier or partnership. Assessment of supplier dependency. | |
| Employee Engagement criteria included in Executive Management compensation | Involve employees in measuring customer satisfaction. | |

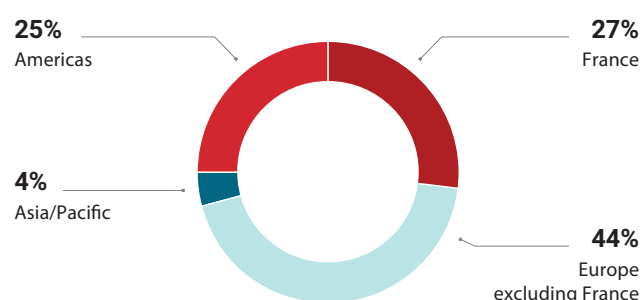
2. Employer Commitment: continue to shape the Company we want to work for

2.1 Key figures

Total workforce at 31 December 2021

| 2021 | 2020 | 2019 |
|-------|-------|-------|
| 1,712 | 1,888 | 1,885 |

Workforce by geographical area in 2021



Type of employment contact

| | 2021 | 2020 | 2019 |
|--------------------------------|------|------|------|
| Fixed-term employment contract | 2% | 4% | 4% |
| Permanent employment contract | 98% | 96% | 96% |

Average seniority

| 2021 | 2020 | 2019 |
|---------|---------|---------|
| 8 years | 7 years | 7 years |

Average age

| 2021 | 2020 | 2019 |
|----------|----------|----------|
| 42 years | 41 years | 41 years |

% of women in the workforce

| | 2021 | 2020 | 2019 |
|---------------------|------|------|-------|
| Total workforce | 30% | 29% | 28.8% |
| Board of Directors | 43% | 43% | 43% |
| Executive Committee | 25% | 22% | 25% |
| Managers* | 15% | 28% | N/A |

* Information on members of Board of Directors is presented in Chapter 4 of the Universal Registration Document 2021.

% of employees with disabilities

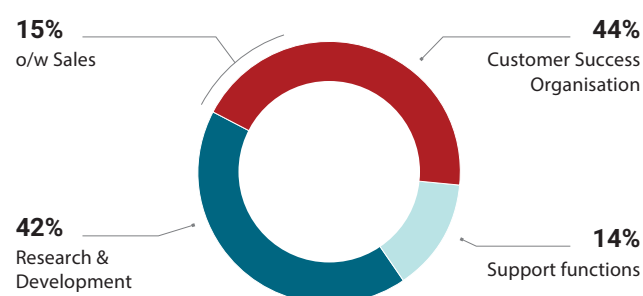
| | 2021 | 2020 | 2019 |
|--------------|------|------|------|
| France scope | 1.7% | 1.7% | 1.5% |

Payroll

(in millions of euros - including social security contributions)

| 2021 | 2020 | 2019 |
|------|------|------|
| 186 | 197 | 196 |

Workforce by area of expertise in 2021



Recruitment and Attrition

| | 2021 | 2020 | 2019 |
|---------------|-------|-------|-------|
| New employees | 204 | 247 | 341 |
| Attrition | 21.9% | 13.6% | 17.5% |

% of women recruited

| 2021 | 2020 | 2019 |
|------|------|------|
| 33% | 28% | 29% |

Employee training

| | 2021 | 2020 | 2019 |
|--|--------|--------|--------|
| Number of training hours per year | 29,915 | 24,176 | 30,900 |
| Average number of training days per employee | 1.86 | 1.50 | 2.0 |

Employee engagement

| | 2021 | 2020 | 2019 |
|------------------------------------|------|------|------|
| Internal survey participation rate | 79% | 86% | 83% |
| Level of employee engagement | 66% | 69% | 58% |

Future of Work: flexible working methods

60% working from home;

40% working on site.

2.2 Talent as diverse as the world around us

2.2.1 Digital sector and diversity

The software publishing industry, by its global dimension and international training standards, recruits people from all continents and multiple cultures.

The digital industry is relatively young compared to traditional industrial businesses and is developing new areas of application. It is growing talent from a wide range of sectors, from science to data analytics, virtualisation, artificial intelligence and artistic fields, such as animation, images, gaming or digital communities grouped around mobile applications creating new services.

Through innovation, the digital sector is pushing back sector boundaries and changing company business models and management methods.

However, this same digital sector suffers from a talent shortage and recruitment is a constant challenge for its players. Despite this shortage, recruitment efforts focus on the integration of new profiles and particularly women, who are under-represented in these businesses, as well as people with disabilities.

Improvements in the gender balance are slow. The percentage of girls or women in digital training sectors worldwide remains low. Axway is faced with a shortage of female candidates, automatically impacting the number of women in the Company.

Access to employment for people with disabilities remains exceptional and a range of insertion programmes is developing slowly and in different ways across countries.

To progress further in 2021, Axway considered its diversity challenges in more depth and decided to develop internal and external programmes to promote gender diversity and the integration of people with disabilities.

2.2.2 Diversity and equality in Axway



Committed to its ethical rules, in particular vis-à-vis employees, and in accordance with local regulations in each of the countries where Axway is located, the Company complies with non-discrimination principles. The main principles are described below:

Equal pay for equal work:

- in France, Axway publishes each year the gender equality index introduced by the Ministry for Labour: <https://travail-emploi.gouv.fr/droit-du-travail/egalite-professionnelle-discrimination-et-harcèlement>;
- in the United States, Axway complies with the Equal Opportunity Employer programme: <https://www.eeoc.gov/employers>.

Respect-for-all training and awareness-raising:

Training initiatives notably include anti-harassment training. Other ethical tools are presented in Section 3.2 in the 2021 Universal registration document.

Gender diversity of teams: objective of 33% in 2023

The feminisation of the workforce improves year-on-year but at a relatively slow pace. This trend is common to the entire IT sector, both in companies and schools.

Depending on the country, women hold on average 15% of executive and senior management positions at Axway. Axway's Board of Directors comprises 6 women (43%) and 8 men (57%). The Executive Committee has 8 members, including 2 women (25%).

| Diversity | 2021 | 2020 | 2019 |
|---|--------|--------|--------|
| Gender equality index in France | 88/100 | 79/100 | 75/100 |
| % of women on the Board of Directors | 43% | 43% | |
| % of women on the Executive Committee | 25% | 22% | 25% |
| % of women in a managerial role (worldwide) | 15% | 29% | |
| % of women executives ("cadre" status in France only) | 26% | 29% | |
| Equal Opportunity Employer commitment in the USA | Yes | Yes | Yes |
| Anti-harassment training | Yes | Yes | - |
| Employees with disabilities employment week (France) | Yes | Yes | |

Already positioned above the industry average, Axway has decided to take measures to improve its gender balance. Women currently represent 30% of Axway's total workforce and the Company has set the objective of achieving 33% in 2023.

Axway is rolling out internal programmes in support of this objective and is undertaking societal programmes to raise awareness of digital careers among young girls and women. These initiatives are presented in Section 3.1, Societal Commitment, of this Chapter.

Disability diversity



Axway has been committed to employing people with disabilities in France for several years. At 31 December 2021, people with disabilities represented 1.72% of Axway's employees in France.

Axway's **Disability programme** in France comprises:

- personalised assistance for employees with disabilities: specific arrangements – ergonomics, equipment, organisation of working time, etc. – and assistance with all the administrative procedures necessary to have their status as disabled workers recognised;

- a disability officer and a Human Resources department manager are responsible for supporting employees who are personally or indirectly dealing with disability;
- the status of “caregiver” was introduced for employees assisting a close friend or relative with disabilities. This provides access to financial support, flexible working hours and adjustments to their working conditions.

HanDigital Week 202

Reducing prejudice and highlighting people's expertise rather than their disability.

This year, employees showed genuine interest in two main events:

- an online conference with the 400 meter Rio Olympic champion, Nantenin Keita and Zoé Maras, a student and promising French and world wheelchair tennis star;
- DuoDay: for several years now, in France and other European countries (Belgium, Finland, Portugal, Germany, Luxembourg), operation DuoDay forms pairs; a person with disabilities and a volunteer professional in companies, local authorities and associations.

In 2021, Axway and Sopra Steria Group welcomed 11 individuals with disabilities.

Axway ranked its societal objectives and defined the integration of people with disabilities as a major focus, deciding to set an objective of a 25% increase in the number of people with disabilities by 2023.

Age diversity

Axway facilitates the integration of both young candidates and more senior employees into the Company and develops their employability throughout their career.

The average age of Axway's employees at 31 December 2021 was 42.

| Number of employees by age range | 2021 | 2020* | 2019* |
|----------------------------------|------|-------|-------|
| Under 30 | 13% | | |
| 30 to 45 | 51% | | |
| 45 to 55 | 23% | | |
| Over 55 | 13% | | |

*Axway changed the comparative age ranges in 2021.

2.2.3 Recruitment: highly sought-after talent

Engineers: still a highly sought-after profile

In a sector where the number of available positions is far higher than demand in many countries, there is still significant competition for job offers.

In 2021, Axway continued to be attractive, with 204 new hires, all recruited through remote interviews adapted to the health context.

Nearly all the 204 new hires started their employment working from home.

Recruitment by geographical area

Axway recruited 204 new employees in 2021, compared to 247 the previous year. On the other hand, more employees left Axway in 2021 than in 2020. Given the health context, all candidate interviews were held remotely.

| Recruitment | 2021 | 2020 | 2019 |
|-------------------------------------|------|------|------|
| Number of new hires during the year | 204 | 247 | 308 |
| Geographic area | | | |
| Europe – excluding France | 47% | 50% | 56% |
| France | 22% | 18% | 18% |
| Americas | 27% | 27% | 23% |
| Asia/Pacific | 4% | 5% | 2% |
| % of women recruited | | | |
| | 33% | 28% | 23% |

Recruitment by age

Across all Axway locations, employees are recruited without distinction as to age, from young graduates to more experienced individuals and senior staff.

| Recruitment by age range | 2021 | Recruitment by age range in prior years | 2020 | 2019 |
|--------------------------|------|---|------|------|
| Under 30 | 26% | | | |
| 30 to 45 | 53% | Over 40 | 33% | 34% |
| 46 to 55 | 15% | o/w between 50 and 55 | 4% | 12% |
| Over 55 | 6% | o/w over 55 | 5% | 5% |

The average age of employees recruited in 2021 was 37.

Recruiting young talent for a “learning” company

| | 2021 | 2020 | 2019 |
|---|------|------|------|
| Interns | 2 | 6 | 15 |
| Work-study/apprenticeship | 9 | 22 | 24 |
| Hiring at the end of the apprenticeship | 4 | 2 | 4 |

In 2021, while the integration of interns and work-study students was complicated by working from home, Axway successfully maintained the positions proposed.

For several years, Axway has been developing a programme to attract young talent through numerous initiatives.

These measures include:

- **relations with schools:** in conjunction with 10 universities and engineering schools in several countries, Axway participates several times a year in school forums to attract students and offer numerous internships each year. Axway also uses specialised recruitment platforms;
- **work-study and apprenticeships:** Each year, Axway offers work-study or apprenticeship contracts to a large number of young people, many of whom are offered employment contracts at the end of their apprenticeship or work-study period;
- **3 years/3 professions programme:** In 2021, Axway continued its "3 years/3 professions" programme during which work-study students and apprentices successively discover the Research and Development, Services and Customer Support professions. Created in 2015, this programme has already welcomed **16 work-study students**. In 2021, **one student** from this programme was hired by Axway at the end of their apprenticeship.

Axway entered into a partnership with a European recruitment platform that provides solutions for career services for higher education institutions. Axway has a dedicated page on this platform where it posts internship and job offers for young graduates.

Promote referral and encourage Axway employees to be its ambassadors

Axway continued its referral programme, encouraging Axway employees to invite members of their network to join the Company.

Permanent employment contracts

| Type of recruitment contract | 2021 | 2020 | 2019 |
|---------------------------------|------|------|------|
| Fixed-term Employment Contracts | 2% | 4% | 4% |
| Permanent Employment Contracts | 98% | 96% | 96% |

Axway recruits almost exclusively on permanent contracts, except for temporary replacements. The share of permanent employment contracts increased in 2021 despite the unprecedented global economic context.

Given the nature of Axway's business, almost all young hires are from higher education institutions. Professional experience is preferred over initial academic training when hiring older employees. This also varies greatly from country to country.

Recruitment strategy and commitment

In 2021, thanks to its Talent Acquisition team located in various countries around the world and capable of covering all the geographic areas where it operates, Axway recruited a variety of profiles, mainly engineers and sales staff.

The partnerships entered into with the specialised platforms help strengthen Axway's employer brand and visibility as an employer of choice.

2.3 A motivating working environment

2.3.1 Incorporate employee expectations

Axway has organised an annual engagement survey since 2016, called the "Axway Voice Survey".

The objective is to regularly measure employee engagement and identify global and local areas for improvement – by country, but also to deploy related action plans. This dialogue is based on the survey, as well as:

- focused working groups by community led by the employees themselves. An internal Hackathon was organised in April 2021 and was highly successfully with employees who were invited to propose initiatives to improve employee engagement;
- full result reports by the Chief Executive Officer or Executive Committee members through meetings held to present results and action plans to be deployed;
- internal roadshows by Axway Executive Management members, held in-person and virtually, open to all employees and organised by geographical area.

In 2021, these meetings continued and once again enabled both the strategy and team innovations to be shared, but also all teams to be kept informed of measures implemented in response to the pandemic and the social link between employees working mostly from home to be maintained.

The level of employee engagement is one of the qualitative criteria considered when determining the Chief Executive Officer's variable compensation.

Engagement survey methodology

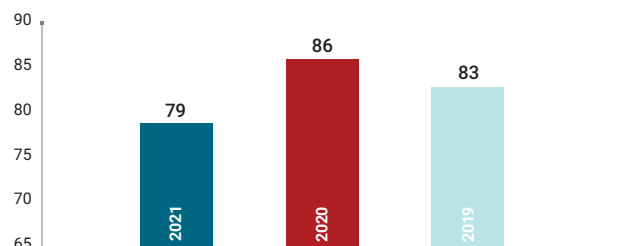
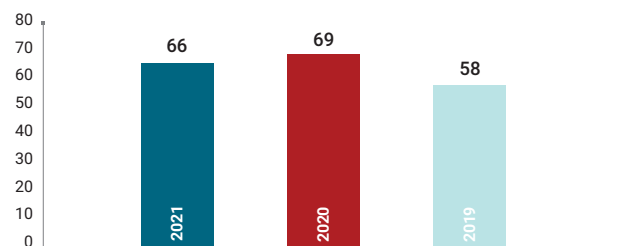
Under the methodology, a baseline participation of 30% of employees invited to respond is needed for the survey to be representative of the employee voice. 65% is considered a good participation rate.

It is recognised that for a company to achieve its goals and create a profitable virtuous circle, it needs an employee engagement rate of 60% or above. This reflects the % of employees who feel positive and engaged with the Company's goals.

Participation in the 2021 survey

Employee participation in the survey at the end of 2021 was 79%, and the engagement rate was held well above 60%, at 66%.

These scores are well above those recorded in 2019, and slightly below 2020, considered an exceptional year during which employee engagement reflected their appreciation of the many support and communication measures implemented during the pandemic.

% participation in the internal survey**% employee engagement**

Conducted in October 2021 for the fifth year running, the employee engagement survey is a key management tool for measuring employee engagement and for Company management, as well as an opportunity for employees to raise issues. The engagement indicator is also included in the executive compensation policy.

| Employee engagement indicator | 2021 | 2020 | 2019 |
|---|-------------|-------------|------|
| Employee internal survey | 1 | 1 | 1 |
| Internal survey participation rate | 79% | 86% | 83% |
| Level of employee engagement | 66% | 69% | 58% |
| Questionnaire including environmental and societal questions | yes | yes | yes |
| Survey on working from home expectations | - | 1 | - |
| Customer satisfaction criteria included in employee compensation | yes | yes | yes |
| Employee engagement criteria included in the Chief Executive Officer's compensation | yes | yes | No |
| Executive Management communication on strategy: number of events organised | yes | yes | yes |
| Executive Committee member internal roadshow | yes virtual | yes virtual | yes |
| Working group following the internal survey | yes | yes | yes |
| Seniority bonus | yes | yes | yes |

2.3.2 Future of Work, a flexible and sustainable approach to working

Balancing working from home and working on-site

Future of Work: 60/40%

Even before the international pandemic, the "Home Office" system was extensive in the United States. 37% of Axway employees based in the United States were already working from home.

In 2020, faced with a global pandemic, Axway implemented working from home measures for all employees in only a few weeks.

In 2021, Axway launched a new flexible and sustainable way of working, *Future of Work*. This system responds to employee expectations expressed in surveys and internal discussions and aims to contribute, for each employee, to a good work/life balance in the most fulfilling conditions.

Drafted with all employees through two internal surveys and local working groups, the *Future of Work* policy promotes a better work/life balance by enabling employees to work **60% of time remotely and 40% of time on-site, in an Axway office.**

This flexibility is mainly founded on:

- coordination between the team and management to define together the days employees work from home;
- freedom to work remotely from a private location several days in a row;
- collaborative digital tools to enable constant dialogue with the team.

This working-time policy was recorded in a professional agreement in France in October 2021, applied from 1 November and in Germany in early January 2022. The roll-out of this flexible arrangement continues in the first-half of 2022 as the various countries lift health restrictions.

| Years | 2021 | 2020 | 2019 |
|---|------|------|------|
| Good practice information on working from home (% of employees) | 100% | 100% | N/A |

Making working time more flexible

Employees on part-time contracts: 2.45%

For each of its subsidiaries, Axway complies with its legal and contractual obligations concerning working time. Working time is determined based on local requirements and activities. In most of the countries where its employees work, Axway is affiliated to a collective agreement: in France, Axway Software implements the French National Collective Agreement for technical design and engineering offices, engineering consultants and consulting firms.

In 2021, 2.45% of Axway employees worked part-time, up from 1.80% in 2020, mostly within the scope of parental leave.

| Working time and working from home | 2021 | 2020 | 2019 |
|---|---------|------|--------|
| Total percentage of employees working part-time | 2.4% | 1.8% | 2.1% |
| Percentage of employees working from home during the COVID-19 crisis | 100% | 100% | N/A |
| Number of days worked from home by employee (per quarter) | 33 days | | |
| Number of days worked from home by employee (per month and in France) - No longer applicable since the October 2021 agreement | N/A | N/A | 5 days |
| Number of employees working from home in the USA (as an annual%) | 37% | N/A | 33% |
| Collective bargaining agreement | Yes | Yes | Yes |
| Employee training manual | Yes | Yes | Yes |

Additional leave

At Axway, additional leave is granted based on several criteria: seniority, age, family situation or personal events in order to improve each employee's work-life balance. For example, this represents on average five days per employee in France.

To recognise the considerable efforts of employees in 2021, as in 2020, Axway granted all employees an additional day's leave,

Maintain low absenteeism

Absenteeism remains very low at Axway and is mainly linked to family events.

Due to widespread working from home, it was difficult to calculate exact rates of absenteeism for 2020 and 2021 in a manner comparable to previous years.

It can however be noted that the absenteeism rate was 2.08% in 2021.

| | 2021 | 2020 | 2019 |
|--|--------------|------------|--------------|
| Absenteeism rate | 2.08% | N/A | 2.72% |
| Sickness | | 0.96% | 1.21% |
| Number of workplace accidents/occupational illness | 0.93% | 0.01% | 0.04% |
| Maternity-Paternity-Adoption | 1.02% | 1.00% | 1.33% |
| Family events | 0.13% | 0.07% | 0.10% |
| CIF (individual training account) | 0% | 0.02% | 0.04% |

Encourage a healthy, balanced and engaged lifestyle

Axway is committed to providing its employees with a safe and healthy workplace. With this aim, Axway has implemented, for several years now, a well-established health and safety policy.

Since 15 March 2020, the start of the first lockdowns, the France Human Resources Department has discussed developments in the health situation and all related measures with employee partners, keeping them informed.

Beyond regulations, the collaborative working model adopted by Axway is accompanied by careful attention to premises where employees work and meet. These are welcoming, sometimes fun places that encourage shared time involving unified themes. In 2020, certain employees, particularly in France and the United States, spontaneously formed online sports, instant messaging and regular discussion groups that continued actively in 2021.

Training and information on the quality of work life

Depending on the year, Axway proposes training modules or communicates information in the following areas:

- health and safety programmes;
- installations and equipment;
- physical and psychosocial risks;
- health coverage;
- good health practices – Healthy Week;
- health and safety intranet space;
- information on the Future of Work system

2.4 Develop the talents of each employee

2.4.1 Skills development

In the digital sector, skills development is achieved both through training and sharing experience. Experience is gained within teams and with customers, partners and suppliers and also now with societal organisations where digital transformation is deployed to citizens in a circle of use that stimulates technological innovation.

2.4.2 Axway University

Axway University is Axway's major development centre. The training offering focuses on the activities critical to Axway's success: technical expertise, upskilling the sales teams, personal development and management, business ethics, security.



For two years, training courses have been digital. In 2021, Axway University set up a new e-learning platform, Learning Management System – LMS – which helped maintain a high level of training throughout the pandemic. Training could be organised for customers, partners and employees despite health constraints in the past two years. Depending on the subject, training may be optional or mandatory. Digital training represented 77% of training hours in 2021. The digital format, which requires short, dynamic sequences, represented 93% of

training hours in 2020. Sessions can be accessed from the new platform and are integrated into Axway's "Jive" internal social network. Employees have access from their usual work tool and choose from a wide range of courses that they can use as they wish, according to their needs.

A total of 29,915 hours of training were provided in 2021 to 2,297 employees⁽¹⁾, i.e. an average of 1.86 days per trained employee, up significantly year-on-year.

| Training sessions in 2021 | 2021 | 2020 | 2019 |
|---|---------|--------|--------|
| Total number of training hours | 29,915 | 24,176 | 30,900 |
| % of e-training | 77% | 93% | 58% |
| Number of employees trained ⁽¹⁾ | 2,297 | 2,292 | 2,194 |
| Average number of training days per employee | 1.86 | 1.50 | 2.00 |
| Number of interns trained ⁽²⁾ | 38,258 | 20,142 | 14,011 |
| Training budget (in €) | 750,000 | n/a | n/a |
| Dedicated training intranet space | Yes | Yes | Yes |
| Employees having a career interview every 2 years | Yes | Yes | Yes |
| % of employees having a career interview | 96% | 96% | 98% |

(1) Including employees who left the Company during the year, but who had taken a training course.

(2) Employees who took several training courses during the year are counted several times.

2.4.3 Experience and innovation, a virtuous circle

Learn and succeed through customers

The use of Axway's solutions by customers is fundamental to the Company's success. All Axway employees contribute to building a customer-centric culture in all projects in which they participate.

If they do not work directly with customers, employees can obtain customer feedback through the permanent monitoring of customer satisfaction, the Voice of the Customer programme, organised by the Customer Experience team.

Due to the emergence of Subscription models, which change the way customers use Axway's solutions, the Company has deployed a training module on assessing customer satisfaction: the *Net Promoter Score* module. This module is taken by all Axway managers and most teams, whatever their function. A total of **1,611 employees have been trained since the launch of this initiative, including 63 employees in 2021.**

In addition, the NPS customer performance indicator has been added to the criteria for determining the amount of variable compensation for eligible employees, as detailed in Section 3.1 of this document.

These various initiatives place customer satisfaction at the heart of Axway's strategy and make all employees active participants in this approach.

Foster innovation and experiment

Open business Factory



The Open Business Factory is a co-creation "laboratory" dedicated to Open Innovation driven by Axway.

Co-built in conjunction with six founding members from leading companies, the Open Business Factory brings together innovation and digital directors from forty leading groups, to federate a community of members wishing to pool their discussions in a momentum of innovation and synergy.

Following a successful launch despite the health crisis, the initiative was strengthened in 2021. The Open Business Factory circle organised six ideation workshops around issues such as innovations expected by millennials and the challenges for companies, major data and data sharing infrastructures, sustainable development as a driver of co-innovation, executive committee involvement in the innovation approach, frugal innovation, the holy grail and, finally, the Marketplace: a field of infinite possibilities. These workshops enabled member companies to launch and enrich new innovative projects.

Coordinated by Axway, the Open Business Factory brings together six founding members:

- Matthieu Heslouin, Chief Digital Officer, BPI FRANCE
- Laurent Papiernik, Chief Data Officer, Gares SNCF & Connexions
- Hicham Rais, Head of Smart Systems and Innovation, IDEX Services
- Dominique Cadi, Deputy Chief Information and Digital Services, Ile de France Mobilités
- Frédéric Charles, Digital Strategy and Innovation Director, Suez Smart Solutions
- Caroline Jamin, Head of the Business Acceleration and Open Innovation Department, TOTAL ENERGIES



Past workshops: peer debates and benchmarking

| Date/subject | Format | Number of participants |
|--|---|------------------------|
| 24 September 2020: "Innovations expected by millennials" | In-person: Breakfast at the Ritz -Paris | 21 |
| 25 November 2020: "Major data and data sharing infrastructures" | Virtual: WORLD CAFÉ WEBINAR | 16 |
| 10 March 2021: "Sustainable development, a driver of co-innovation" | Virtual: WORLD CAFÉ WEBINAR | 15 |
| 7 May 2021: "Executive Committee involvement in the innovation approach" | In-person: Breakfast at the Ritz -Paris | 21 |
| 9 December 2021: "Frugal innovation 2.0: the holy grail" | In-person: Breakfast at the Ritz -Paris | 16 |
| 16 February 2022: "The marketplace: a field of infinite possibilities" | In-person: Breakfast at the Ritz -Paris | 15 |

<https://www.openbusinessfactory.com/>

Internal mobility for continuous learning

| | 2021 | 2020 | 2019 |
|--------------------|------|------|------|
| Internal transfers | 181 | 371 | 110 |

To meet the expectations expressed by employees in the first employee engagement surveys, Axway pursued its voluntary internal mobility policy for all employees in 2021.

All job offers (excluding highly confidential jobs) can be viewed by all employees. By going to the internal network's Make your Move "MY Move" Career page, each employee can access the internal application management portal. In addition, every Friday, the internal newsletter publishes three to five new offers to give them special visibility.

The internal mobility policy and the rules for benefiting from it are available in various formats and distributed on a regular basis.

181 employees moved internally in 2021, either via a promotion or a change in position. The 2019 published figure did not include employees whose job title or code had changed, contrary to 2018 and again this year.

In addition, employees are encouraged to promote available positions at Axway in their own network, through the referral programme presented in the recruitment Section of this document.

Appraisal for progress and growth

• **Talent Review approach:** for the third year in a row, Axway set up and carried out a global talent review (95% of the total workforce) to appraise and discuss the performance and potential of each employee. Carried out collectively and shared by managers and Human Resources managers, this annual exercise, which replaces the former annual assessment interview system, makes it possible to identify key talents and the development and training actions necessary for the development of each employee.

This new system is part of the adoption, at the end of 2019, of a global approach to continuous performance management based on ongoing dialogue between employees and managers.

• **The professional interview:** since 2014 and in accordance with the law, Axway has also conducted – in France – a professional interview every two years. This meeting between the employee and a Human Resources professional allows the employee to consider his or her professional development paths, both in terms of qualifications and employment and provides an opportunity to discuss his or her aspirations.

Benefits of the Axway community

Axway's teams in 18 countries can share Company events via the "Jive" internal social network, internal newsletters and on-site events:

- **the "Jive" internal social network:** a day-to-day tool for exchanges between employees, Axway's internal social network is aimed at all employees and is the Company's internal space for discussion. Organised by spaces and communities, it provides a range of services: internal resources, employee information, tools, customer references and product catalogues. It was particularly precious during the two years of the pandemic which generated considerable internal communication.

In addition to the internal social network:

- **the Griffin Digest:** this weekly internal electronic newsletter distributed by the Human Resources Department, whose name echoes the griffin of the Axway logo, is sent every Friday to all employees, regardless of their geographical location or the entity to which they belong;
- **the Friday Customer Connection letter:** this is distributed by Axway's CEO, who presents a signature or customer reference to all teams each week, in the form of a few lines. It is a popular channel for gaining a better understanding of how customers use Axway's solutions;
- **communications issued by Executive Management and the various members of the Executive Committee:** these increased in 2021 to inform employees, support activity and employee morale and share decisions;
- **Executive Roadshows:** in-person and virtual meetings organised by Executive Management members with employees by country.

Develop managerial power

In 2021, Axway continued the Objectives and Key Results – OKR – approach, which enables Axway to collectively manage the performance of its teams by defining strategic objectives by business line and even key results that are shared on a quarterly basis.

In order to deploy the continuous performance management approach to all employees, the Company has designed training modules to introduce teams to these concepts.

Complementary to this approach, the Conversation/Feedback/Recognition – CFR – system encourages ongoing dialogue and regular feedback between managers and employees throughout the year.

These training courses were deployed during 2020 and continued in 2021 with 368 employees receiving 128 hours of training.



2.5 Recognise and promote talent

Average seniority: 8 years

Build loyalty in a long-term project

Axway's objective is to write a shared employee/Company history. This shared history is already visible in the average seniority of men and women at Axway – 8 years – in a volatile employment market.

Recognise and celebrate employee loyalty

At Axway, employee loyalty is rewarded. Employees who have been with Axway for 3, 5, 10, 15, 20, 25, 30, 35 or 40 years are honoured for their loyalty to the Company during a friendly event, an initiative held at all Axway sites and shared on Jive, the internal social network. 541 employees were honoured in 2021.

Pay according to attractive financial and social conditions

The Axway compensation policy reflects industry practice, according to the country of business, and also the assessment of the performance and potential of each employee. Employees are encouraged to build and develop their own potential within the Company.

In 2021, as in previous years, Axway paid salary increases in accordance with a policy of individualisation, applied in a fair and identical manner in all countries where Axway operates.

In France, employees are eligible for profit-sharing according to the provisions of a new agreement signed for the period 2021-2023 as well as a company Savings Plan.

In accordance with the law and best practice in each country, Axway also takes part in retirement and pre-retirement schemes, as well as occupational-insurance schemes covering its employees for various additional contingencies, beyond the regulatory provisions imposed by the different countries.

Example compensation components specific to Axway

| Compensation components specific to Axway | 2021 | 2020 | 2019 |
|--|-------|-------|-------|
| Variable compensation tied to Company performance depending on the position held | Yes | Yes | Yes |
| % of employees receiving variable compensation tied to customer satisfaction | 61.7% | 60.0% | 58.9% |
| % of employees receiving profit-sharing – France * | 100% | 100% | 100% |
| Number of shares granted to employees under the annual plan | - | - | 200 |

* Applicable to all Axway France employees with at least 3 months' seniority in the fiscal year, or at the date of departure or in the event of contract termination. 515 employees received profit sharing in 2021 in respect of 2020 results.

Become an Axway shareholder: the free share grant programme

In order to involve its employees even more closely in the Company's transformation project, Axway introduced two free share grant plans. The first plan was launched in 2012 following the Company's IPO. The second plan was launched in 2019 with the grant of 200 free shares to all Axway employees

active at that date, subject to the condition that they remain employed by Axway for a period of three years, i.e. until 2022.

At the end of December 2021, Axway employees held 0.96% of the Axway share capital vs. 0.84% in 2020.

The free share grant plans are described in Chapter 4 and the breakdown of the share capital is presented in Chapter 7 of the 2021 Universal Registration Document.

2.6 2023 social objectives

Axway constantly implements an improvement process, with both short and long term goals, to develop its employer responsibility in line with its customer commitments and its strategy.

In 2021, collaborative efforts were also launched to determine a common framework for the Company as a whole, based on new working practices, flexibility and working on-site and from home, while tailoring the Axway strategy to employee expectations: the "Future of Work" programme.

Axway has set the following indicators for 2023:

- employee engagement score above 70% in 2022 and 2023;
- increase in the % of women employees to 33% by 2023;
- 25% increase in the number of people with disabilities by 2023.

These programmes will be deployed across the Company and adapted to local requirements.

Employer Commitment

EMPLOYER

- **Employee Engagement Score >70%** for 2022 & 2023
- **33% of women in total headcount** by 2023
- **+25% of people with disabilities** by 2023

3. Societal Commitment: have a positive impact in our communities as a leading publisher



Axway's societal commitment exists in the digital environment where innovation changes use, including in civil organisations. The Company participates, in particular, in the work of professional bodies such as Syntec/Numeum in France.

Axway's materiality analysis has helped deepen the assets that Axway can share with civil organisations, in a similar way to its employer commitments. They are presented in the first part of the NFPS.

Axway's societal responsibility indicators are founded on surveys conducted with its customers and employees, and through dialogue with its shareholders, partners and suppliers.

The societal responsibility programmes are very naturally built around the technological skills and digital uses that Axway teams can share with all its stakeholders including civil organisations and particularly women and people with disabilities who are less represented in the sector.

The societal commitment is truly evidenced when legal tools formalise commitments. Axway therefore continues to develop its internal processes, charters and responsible labels that push forward Axway with its stakeholders.

3.1 Increase customer satisfaction



The satisfaction of Axway's customers, alongside that of its employees, is Axway's first commitment. This satisfaction guarantees the performance of the IT systems implemented and creates a virtuous value chain, notably through upskilling teams, innovation, and better digital services. This value creation is in turn shared with internal teams and other stakeholders: partners, suppliers, investors.

The Axway Customer Success organisation

The Customer Success organisation, which is central to the Axway business model, as described in the profile of the 2021 Universal registration document, represented 42% of Company employees in 2021. Its goal is to maintain a permanent dialogue with customers to propose tailored and scalable solutions and services in line with their expectations.

This department is managed by the Customer Success Officer, a member of the Axway Executive Committee and metrics are presented each year to the Board of Directors and the Appointments, Governance and Corporate Responsibility Committee.

Measure customer satisfaction

The customer satisfaction indicator set up at Axway in 2016 is based on the Net Promoter Score (NPS) method. Incorporated into the Axway risk management process, it is used as a performance indicator for the variable compensation of certain employee categories and the Chief Executive Officer (see Chapter 4 of the 2021 Universal registration document).

The Net Promoter Score (NPS) indicator measures the satisfaction of 3 customer categories: Detractors, Passive, Promoters. It is built around:

- an iterative process: a closed-loop customer feedback survey, ensuring dialogue with all customers throughout the year and over the long term;
- customer management tools: Customer 360° Dashboard, etc., "Customer success plans" which reinforce this dialogue, provide follow-up reports and update marketing databases to launch campaigns, meetings, training courses, etc.;
- customer expectations which fuel Axway software design and Research and Development.

The customer satisfaction indicator is 29 in 2021, a rise of 4 points on the previous year.

Axway has set itself the goal of increasing customer satisfaction with a Net Promoter Score (NPS) score of 40 by 2023.

The main customer expectations measured by the system cover the following concerns:

- software quality and performance;
- technical support;
- service engagement;
- training;
- customer events;
- customer management.

These measurements drive the Axway software design and development strategies.

Tailor customer dialogue

From the beginning of the health crisis in 2020, the customer engagement strategy enabled Axway to adapt its means of communication. This was successfully continued in 2021, although in a more hybrid format:

- certain customer events were held in-person, such as Axway's 20 year celebration in Paris in October 2021 - while others became virtual, shorter but more frequent;
- 79 user groups and customer advisory board meetings were held virtually in 2021;
- selective studies and questions helped assess well-being in customer relationships;
- the on-line Axway Customer Community was expanded with over 4,000 participants by the end of 2021;
- a "virtual contact" training course was launched to share good practices in video conferencing;
- an ideation portal was introduced in 2021, where customers, partners and employees can collaborate on product ideas and vote on the ideas they like.

Train and share skills

The expectations identified in customer surveys are used to build training programmes for both Axway and customer teams.

Sharing Axway's CSR performance with its customers

Each year, Axway assesses its CSR performance using the EcoVadis platform to promote transparency and trust by customers and business partners. Bringing employees, processes and the platform together, EcoVadis implemented a broad-spectrum CSR assessment methodology covering 150 purchasing categories, 110 countries and 21 CSR indicators. This is the leading 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.

Silver EcoVadis label



Axway retained its Silver label rating, with an improved score of 61/100 compared to 60/100 last year.

Axway aims to improve its performance and achieve the Gold label by 2023.

Axway also answers customer questionnaires via other independent external organisations such as AFNOR with the Acesia platform.

Support co-development

There are an increasing number of co-development or co-innovation projects bringing together a customer, a partner, a start-up and a public or societal organisation. The development of mobile apps to which Axway contributes data helps offer new services to general public users.

3.2 Deploy our responsibility vis-à-vis all our stakeholders

3.2.1 With our employees, sharing their expertise with societal organisations



Axway has included sharing expertise in its Societal commitment.

In 2021, two lines of progress were defined:

- digital development programmes for women;
- awareness-raising programmes for the integration of people with disabilities.

In addition, Axway supports initiatives undertaken by employees through societal organisations, according to the countries where it is located.

Axway helps develop and raise awareness of digital careers with organisations such as:

- Syntec in France: contribution to surveys on the digital sector, workshops;
- Talents du Numerique "Des metiers d'avenir pour un monde à inventer": participation in the work of this organisation aimed at promoting and developing digital innovation for all, and more vulnerable groups. <https://talentsdunumerique.com/>;
- Mission handicap: described in Section 3.2 of this document.

Digital development programmes for women: deploy 4 new programmes by 2023

Axway has decided to increase its involvement in sharing its digital expertise with societal organisations. In 2022 and 2023, Axway's Corporate programmes facilitated by the CSR system will be deployed with contributions from volunteer employees to provide personal accounts and support young girls and women:

- in primary and high schools, to encourage young girls to pursue scientific or artistic studies that will lead to digital businesses;

- in universities, to share Axway's experience with female students;
- in local associations working in girls' or women's communities to promote digital learning and training.

The programmes supported by Axway over the past several years have therefore been analysed with a view to a more comprehensive deployment. They include:

Elles bougent

The Elles Bougent association aims to promote exciting scientific and technical professional paths to schoolgirls and female students in France. It seeks to demonstrate how these professions are accessible to women through the testimonials and the mentorships of women that have chosen these professions.








Wi FILLES

The FACE foundation Wi-Filles programme was chosen to support the digitisation campaign with Axway individual 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 take control of their education and career. (<https://www.fondationface.org/projet/wi-filles/>).

PWN | PARIS
PROFESSIONAL WOMEN'S NETWORK

Professional Women's Network, a European women's network with 700 active members in Paris and 4,000 members in 30 cities, present in Dublin, Rome, Berlin, Madrid, etc. It promotes women engineers who transmit their passion and wish to encourage vocations. The partnership between PWN and Axway enabled 12 female employees from Europe to participate in discussions organised by the network and thus raise awareness of Axway. The Axway Human Resources Director facilitated a roundtable discussion on gender diversity during the organisation's annual congress on 7 October 2020.

Societal initiatives launched under the impetus of employees in different countries.

| Theme | Example initiatives |
|---|--|
| Dignity of the human person | |
|  | In France , employees organised a collection of gift boxes to be distributed for Christmas to people in need. Each box contained something warm, something tasty, something to relax, a beauty product, and a small card. Axway collected 50 boxes which were then redistributed to the neediest through different charity organisations. |
|  | In Bulgaria , employees bought and donated the most necessary and needed products for families in support of "Together Forward – Rosino" foundation. This foundation provides a hot lunch for children from socially disadvantaged families, collects clothes and shoes. "Together Forward – Rosino" Foundation supports about 40 families in the area. Smile4you is an association in Bulgaria that supports children with problems in development and their families who could not work "normal" jobs as their children's special needs. Every year, Axway Bulgaria collaborate with them by purchasing meaningful gifts for employees for various occasions through the year. |
|  | Feed My Starving Children (FMSC) is a non-profit organisation that provides nutritious meals to children worldwide. Volunteers package the meal, then the packages are distributed to schools, clinics, orphanages, and feeding programmes around the world. On 18 August 2021, Griffins packaged MannaPack Rice which is the first and original food formula that FMSC uses. The ingredients include soy, rice, vegetables, and vitamins. These ingredients reduce problems with malnutrition. Axway employees packaged 87 boxes, which made 18,792 meals, and fed 51 kids for a year. In the United States, St. Mary's Food Bank exists to help feed hungry families throughout Phoenix and nine Arizona counties. Employees who are local to the Scottsdale office brought in cans to the holiday party, while remote employees had the opportunity to make a monetary donation online. The Scottsdale office donated enough cans to fill an entire SUV. |
|  | In Romania, FDP Protagonisti în Educație is an association that promotes the human dignity of the most disadvantaged people in our communities, building on the experience of each of them and involving them as real protagonists of their lives. Axway Romania employees donated 4500 RON (€910), which will be used to support 50 children with special educational needs who receive therapeutic support in the "Wonder" day centre. Fresh fruit for hospitals in Romania: Axway donated approximately 110kg of fresh fruit to the medical entities of several hospitals in Bucharest including Fundeni Hospital and the Cancer Institute as well as to other children's hospitals. |
|  | In France , five-year partnership with ADIE - a non-profit association - to which Axway supplies software. This association helps people marginalised in the labour market, without access to the traditional banking system, to set up businesses and thus create their own jobs, via the use of microcredits. |
| Environment | |
|  | Adopt a Hive is a socially responsible programme that offers a comprehensive solution to the problems in the beekeeping industry in Bulgaria and supports all Bulgarian honey producers and of course preserving the sweet bees as they are one of the most important creatures on the planet and their existence is crucial for all other species, including humans. Caps for Future in Bulgaria: this campaign consists in collecting plastic caps for recycling. The money obtained goes towards purchasing incubators for premature babies and special ambulances for children. Dedicated collection areas have been set up on Axway's premises. The caps are collected twice a year and the programme is supported by communication campaigns. From 2021, we started to collect and recycle aluminium cans as well. |
| Animal Dignity | |
|  | Animal Rescue Sofia is a Bulgarian organisation working to solve the problem of stray dogs and cats. Dozens of people come to the shelter to help every week - the volunteers provide indispensable help to the dogs by walking and socialising them. Thanks to them, the dogs in the shelter improve their contact with humans and build a stable relationship of trust. |

3.2.2 With our partners: innovate in responsible values



Axway applies its ethical and anti-corruption rules to the various partners with which it works. These partnerships are formalised at local or global level and according to the different types of agreements:

- global technology alliances to strengthen Axway's on-premise and cloud-based offerings with suppliers such as AWS and Microsoft Azure;

- integrator partners to implement Axway solutions within customers, whether through co-selling, referencing or reselling. Axway works with Digital Service Providers - DSPs - both generalists and specialists in digital transformation, on a local or global scale;
- partners for the distribution of Axway products. These resellers are particularly present in Asia Pacific and Latin America;
- consultancy firms for Axway's solutions as part of their digital transformation missions.

In 2021, Axway again strengthened its partner system which encourages co-innovation through the creation of joint solutions via the Amplify Marketplace. With its partner ecosystem, Axway extends its market impact through different levels of reciprocal commercial commitment, co-marketing initiatives and partner training courses.



Axway also measures the level of satisfaction of its partners. The Net Promoter Score (NPS) indicator, whose methodology and system were previously described in Section 3.3.1 of this document, provides essential information for working relations between Axway, its partners and its customers.

In 2021, the satisfaction survey of global partners confirmed their strong commitment to Axway.

3.2.3 With our suppliers: strengthen the sustainable purchasing system



Over the past two years, Axway has improved its purchasing and supplier selection system, strengthening its sustainable purchasing analysis process in line with its commitments. This information is detailed in Section 1.8 of this document.

Purchases are central to Axway's activities, both for internal consumption and projects undertaken with customers and partners. Purchase agreements are carefully organised at Axway to guarantee the Company's service quality and compliance with ethical commitments.

IT purchases for Axway's internal activity and customer projects are made by the dedicated IT Purchasing team which oversees the clauses contained in the contracts with the Legal Department. Depending on the supplier, Axway will retain the clause already set out by the supplier or incorporate one of its clauses from its ethics charter available on the website www.axway.com.

Other purchases are made directly by Business Units based on the procedures drawn up for Axway as a whole and its 18 global offices.

Axway's purchasing procedures

The procedures are known and available on the Company's internal social network. The Legal Department discusses each purchase with the Business Unit and ensures that clauses similar or in reference to the Axway ethics charter, including anti-corruption practices, are included and signed by the supplier or partner.

The purchasing procedure covers 100% of purchase agreements, which are reviewed by the Legal Department and include social responsibility clauses.

A defining purchase management tool

Deployed at the end of 2020, Axway's Purchasing platform enables the secure signature of supplier contracts, enhancing its purchasing control and responsibility procedure. Axway supplier selection and commitment indicators may also be drawn up under this project.

Regular audit and monitoring of purchasing procedures

Purchasing procedures are regularly audited by the internal audit Department and presented to the Audit Committee.

Integrating CSR criteria into the purchasing processes

The ethical tools and charters described in this document are shared with Axway's suppliers.

Social responsibility clauses depending on the type of supplier: responsibility charters are therefore tailored to the types of service provider: purchases for internal use, purchases for external use, OEMs, external products embedded in our offers.

Furthermore, when analysing its indirect environmental impact presented in Section 4.2 of this document, Axway launched an analysis of the 50 main suppliers of goods and services, computer resources and IT services to consider, as a first step, their environmental and societal performance.

The implementation of a Green Taxonomy in 2021 also included an analysis of resources and services purchased from suppliers.

This work contributes to developing Axway's sustainable purchasing approach, which occupies a major place in the Company's business model.

3.2.4 With our shareholders and investors: financial information transparency



Since its shares were listed in 2011, Axway has constantly enhanced its financial reporting according to best practices to ensure the equal treatment of all shareholders and inform them of financial matters in complete transparency. These practices are primarily based on the following processes:

- adhesion to the Middlednext Code and distribution of governance between the Board of Directors and the Executive Committee;
- Euronext Paris listing;
- participation in the Gaia socially responsible investment index;
- team, resources and website dedicated to shareholders and investors;
- dialogue with investors and individual shareholders;
- observance of financial reporting best practices;
- responsible dividend policy.

ESG responsible investment index: Gaia Rating



For several years, Axway has participated in the Gaia Rating index by providing all the non-financial data requested by Gaia. This index designed for investors measures the social, societal, environmental and governance indicators of companies that complete their questionnaire and then selects the best 230 entities.

In 2021, Axway was rated 75/100 and therefore retained in the index for companies reporting revenue of between €150 million and €500 million.

Analysis of new sustainable finance indices for Axway

Investors' new expectations for ESG performance indicators led Axway to review all surveys submitted to it by non-financial rating agencies.

In the coming months, Axway will conduct an opportunity study on inclusion in a new ESG financial rating index.

3.3 Evidence our commitments using ethical and responsible tools



Axway has decided to work on a global ethics programme driving values in the Company as a whole and within its ecosystem. This programme is also materialised in charters which are shared with stakeholders.

The charters are all available on Axway's website under the heading Ethics & anti-corruption.

Trust in our business relationships



The **Ethics charter** is applicable to employees, company officers, executives as well as stakeholders with which Axway works. Its purpose is to present the key values for Axway and the legal tools that ensure compliance with these values.

Axway has demonstrated the principles underlying this charter through specific examples. An online training course is available. Axway's objective is that this training is completed by all employees. New recruits must complete it within three months of their arrival. Automatic reminders are sent out if necessary.

Whistle-blowing procedure

To safeguard its values, in 2018, Axway set up a whistle-blowing system respecting the confidentiality of the identity of the whistle-blower and the individuals targeted. In addition to questions concerning the application of our Ethics charter, the dedicated email address, axway.notification@axway.com, has dealt with three whistle-blowing incidents since its launch.

Fight against corruption

Axway has adopted an active approach in the fight against corruption. Each year, Axway renews its adhesion to the United Nations Convention of 31 October 2003 against corruption which commits it to applying the laws in force, including anti-corruption laws in the countries where it operates. More specifically, Axway has undertaken all measures to satisfy its obligation to comply with the Sapin 2 law and continues to develop its monitoring practices and tools accordingly.

Securities Trading Code of Conduct

As a listed company, Axway is subject to compliance with the provisions of European and French stock exchange laws relating to market abuse and insider trading.

The basis of this regulation is founded on the principles of transparency and equality between shareholders and investors so that any buyer and seller of financial instruments of a listed company has access to the same information, at the same time, on that company.

In accordance with AMF recommendation no. 2016-081, Axway has set up a committee dedicated to the publication of insider information. It is responsible for assessing whether information is privileged or not and for studying the consequences of this qualification in terms of the dissemination of information.

The purpose of the Securities Trading Code of Conduct is to inform employees, company officers, executives or other Axway stakeholders as well as any current or future shareholder of the Company of the legislative and regulatory principles relating to market abuse as well as the additional internal measures put in place in particular to prevent insider misconduct. The Code of Conduct was updated in 2020 to comply with AMF regulatory changes and recommendations.

Data protection

Through its presence in 18 countries, Axway wishes to maintain a common culture of transparency, trust, integrity and responsibility both internally with its employees and externally with its customers and business partners.

Axway's privacy compliance programme (<https://www.axway.com/en/gdpr>) supports this culture by presenting policies to ensure that processing complies with the laws and regulations in force in the countries where it operates: the General Data Protection Regulations in the EU (GDPR), the Privacy Act amendment 2017 in Australia, the California Consumer Privacy Act in the United States and the *Lei Geral de Proteção de Dados* in Brazil.

In keeping with its pledge to accompany the digital transformation of its customers in complete security Axway publishes an information memo on the protection of privacy for each of its products on its website, to support its customers in their privacy compliance policies.

Ensure digital security

As a software publisher, digital security is central to the Company's processes. As already presented in the preceding Sections of this document on customers, suppliers and partners, Axway ensures the security of its exchange processes and applications.

The digital security system is organised by the Executive Security Committee which runs the Security Management System via a dedicated team. The Committee meets three times a year.



Security risk management and the related system is described in Chapter 2 of the 2021 Universal Registration Document.

The programmes addressing the needs of all stakeholders are founded on recognised standards, protocols and processes and include:

For customers:

- ISO 27001 certification
- SOC2 Type II audit
- assessment of security as an indicator of customer loyalty
- security of cloud services
- security of support services
- security management for developments without any breaches and viruses
- penetration-integration testing for Axway products and services
- sector compliance depending on customer requirements
- auditing
- internal training

For employees:

- security of exchanges between Axway's internal systems
- security of information contained in the Company's information system
- security of systems used for remote working

With various types of partner:

- hosters in the cloud
- integrators, advisers

For shareholders and investors:

- GDPR personal data protection policy
- file safeguard and shareholder identification procedures

In the COVID-19 context in 2021:

- business continuity plan based on the ability of all teams and departments to work from home
- continuity of internal systems that can be accessed at any time from anywhere in the world
- continuity of cloud services for our customers

Management of Cyberattack risks:

- internal teams dedicated to managing system and development security
- rapid response policy and procedure for security incidents
- Security Operation Centre, operational 24/7
- advanced systems to protect communications, networks, work stations and premises

Security training

Training sessions on best security practices last in general 30 to 45 minutes. They are supplemented by a second training session on current Axway security policies, the duration of which depends on the expertise already acquired by each employee the previous year.

In 2021, an internal conference called the "Axway Security Conference" provided an opportunity to present, in a concrete

manner, the various projects that contribute to the security of our developments and services, as well as how our products and services meet the security expectations of our customers and the market.

Attended by more than half of the Company's employees and recorded and available on the Axway University platform, this conference enriches Axway's security training catalogue.

| | 2021 | | 2020 | | 2019 | |
|--------------------------|--------|-------|--------|-------|--------|-------|
| | number | hours | number | hours | number | hours |
| Security training | | | | | | |
| Annual security training | 3,726 | 2,029 | 2,944 | 2,208 | 2,668 | 1,709 |

This table does not include more technical training sessions, such as sessions focusing on software development, which are generally longer per employee.

3.4 2023 societal objectives

Axway will roll out the societal commitment programmes described in this document across the Company's entire scope and with the participation of employees over the coming years based on the following priorities:

- continue to boost customer satisfaction with a score of 40 by 2023 (29 in 2021);
- enhance its CSR performance via the EcoVadis platform with a score of 72/100 (61 in 2021);
- develop the programme for young girls and young women in several countries where Axway operates.

Societal Commitment

SOCIETAL

- **Net Promoter Score > 40** by 2023
- **Gold EcoVadis ranking** by 2023
- **4 local programmes** in female digital education by 2023

4. Environmental Commitment: reduce our direct and indirect impact



Digital sector and environmental impact

Long regarded as an “intangible” industry, the digital “information and communication technologies (ICT)” sector was not clearly identified as a leading stakeholder in environmental issues. On the contrary, in the years which saw the development of computer science and then the Internet, the sector was considered as a contributor to digitisation, as paper use was eliminated and transport reduced in an environmental virtuous circle.

There was then a shift in consciousness with the acceleration of digital transformation, the development of mobile applications and the need for corresponding resources, leading digital industrial players to adopt resource management, streamlining and offset strategies to limit costs and reduce the ecological footprint.

International regulations and climate change goals are now set out in the governance codes and strategies of responsible businesses, including in the digital sector.

A new phase for Axway

In 2021, at the instigation of Patrick Donovan, Chief Executive Officer, Axway reconsidered its environmental trajectory to gradually adopt a more sustainable approach to its activities. This was a strategic turning point, if we consider that the aim is to attain carbon neutrality by 2028.

Our work focused primarily on the following areas this year:

- definition of quantitative goals to reduce the direct impacts of our activities;
- inclusion of our greenhouse gas emissions relating to our products and services;
- initial analysis of Axway's external activities with an indirect impact;
- initial calculation of the indirect impact using the top 50 suppliers of goods and services in the resource supply chain;

- monitoring European Green Taxonomy work in line with CSR.

An initial trajectory was therefore established for the next stages over the seven-year period:

- 2022-2023: understand all the sectors to be covered, determine the key monitoring indicators, consider the sustainable purchasing process, set resource measurement tools, organise internal programmes with the contribution of employees and the progressive commitment of Axway's external stakeholders;
- 2023-2024: integrate CSR work consistently with the alignment with the European Green Taxonomy, roll-out of the reduction and offset programme and processes;
- 2024-2027; stabilise the approach in the Axway business model.



Axway has set the target of achieving carbon neutrality by 2028. This project will involve employees and stakeholders and will be rolled out from 2022. The project is based on 3 levels of action: measuring, reducing and offsetting our impact.



Take account of the direct and indirect impact of activities on the environment



During the year, Axway produced an initial snapshot of its greenhouse gas emission sources, the types of activities concerned and the 3 scopes to be considered in order to classify them in the following two categories:

- direct impact: resource consumption linked to the internal activities of the Company (premises, operations IT infrastructure);
- indirect impact: resource consumption linked to external activities (software design, research and development), particularly with customers.

Emission sources, indicators by activity and scope, for the calculation of the direct and indirect impact by emission source and usage category

The Scope concepts are defined in Section 4.1. of this document.

| In CO ₂ metric tons equivalent | Direct Impact Resources used for our internal activities | | | Indirect Impact Resources used for our external activities | |
|--|---|--|---|---|---|
| | Scope 1 | Scope 2 | | Scope 3 | |
| Emission sources Pictograms gas, fuel-oil, water | Consumption of gas and fuel-oil Fuel consumption by the business vehicle fleet | Electricity consumption Heating network consumption in La Défense | Purchases of services and resources, non-IT suppliers | Purchases of services and resources, IT suppliers | Purchases of services and resources, IT suppliers |
| Usage categories in the Company's activities Pictograms software and server | | | - Services essential to our operations (lease of premises, insurance, advisory services, communication, telecommunications, business travel, sub-contracting, etc.) - Products essential to our operations (furniture, etc.) | - Software licences and Subscriptions - IT sub-contracting services - Equipment (hardware, telephony, etc.) | - Cloud hosting - Software licences and Subscriptions - IT sub-contracting services |
| | 133 | 728 | 3,948 | 1,922 | 1,357 |
| | | | 6,713 | | 1,357 |
| | | | 83% | | 17% |

4.1 Measure to reduce our direct impact



Our desire to integrate environmental challenges into our day-to-day activities led Axway to implement rules to reduce energy and raw material (mainly paper) consumption. Launched several years ago, this virtuous momentum was consolidated in 2021.

The health context in 2021, with working from home adopted beyond government recommendations, directly impacted resource consumption:

- Axway's premises largely unoccupied;
- travel reduced to what was strictly necessary;
- widespread use of digital collaboration tools.

4.1.1 Resource management processes

The need to manage the environmental impact of our internal activities (direct impact) is covered by a continuous improvement programme that specifically involves Axway's relevant functional divisions, employees, and all its stakeholders.

Major processes are designed to reduce resource consumption:

Working from home, a means of reducing environmental impacts

The new rhythm of 40% working from home/60% working in the office described in Section 2.3.2 of this document generates a structural reduction in resource consumption and particularly energy consumption at our premises and transport. A more precise assessment will be conducted in the coming years.

Video conferencing

The use of video conferencing became widespread in 2021 with the new *Future of Work* system.

Use of digital meetings: essential in collaborative work.

| Video conferencing | 2021 | 2020 | 2019 |
|--|---------|---------|---------|
| Number of digital meetings ⁽¹⁾ | 246,793 | 281,483 | 126,189 |
| Digital meetings per employee ⁽²⁾ | 144 | 149 | 67 |

(1) Number of meetings measured in WebEx – Teams apps.

(2) Calculated based on 1,712 employees as at 31/12/2021, with data rounded.

Electronic signature

Already in place for several years, the use of the DocuSign electronic signature solution has increased for all types of official documents.

Theoretical savings realised with the use of DocuSign represent 7,927kg of wood, 194,793 litres of water, 18,607kg of coal and 1,288kg of waste.

| Electronic signature | 2021 | 2020 | 2019 |
|------------------------|--------|--------|--------|
| Number of files signed | 19,572 | 9,671 | 8,303 |
| Number of pages signed | 97,247 | 46,571 | 33,746 |

Reasonable consumption of paper, plastic and cardboard

In 2021, Axway once again addressed the issue of paper, plastic and cardboard consumption in its internal activities.

- paper: for several years now, the Company has adopted measures to limit paper usage, raised awareness internally and set up digital tools to reduce the need to print;
- plastic: pursuant to local regulations, Axway has eliminated the use of plastic cups and the centralised purchase of plastic bottles in several countries;
- cardboard: this mainly involves packaging for IT equipment or office supplies ordered by Axway. It is reused as much as possible for equipment returns or redistribution or included in the local recycling process.

These approaches are adapted according to the country and environmental regulations.

In its commitments, Axway seeks to promote awareness among internal buyers and employees on how to reduce these consumables.

| Paper consumed (reams in France) | 2021 | 2020 | 2019 |
|----------------------------------|------------|------------|-------------|
| France | 195 | 150 | 750 |
| United States | 152 | 163 | 395 |
| Romania | 75 | 50 | 75 |
| Bulgaria | 15 | 40 | 40 |
| Ireland | 5 | 10 | 20 |
| Germany | 100 | 40 | 195 |
| TOTAL | 544 | 453 | 1475 |

Other means of reducing paper, plastic and cardboard consumption

| Meal payment card | Replacement of paper since 2020 |
|---------------------------------|--|
| Shareholder exchanges by e-mail | 60% of Axway's registered shareholders have provided their e-mail address to eliminate the use of paper. |
| Beverage containers | Distribution of water bottles and mugs to our stakeholders. |

Waste recycling and processing

Axway's activity generates waste with a high recycling potential. It mainly includes paper and cardboard as well as computer consumables.

In France, Axway has chosen a supplier that provides uplift services - for recycling purposes - of cardboard, paper, plastic, cans and printer cartridges. The supplier does both regular and one-off collections. Voluntary collection points have also been installed to facilitate the process for employees. For WEEE (waste electrical and electronic equipment), Axway continues to pursue its policy of making donations to associations or to employees.

In 2021, Axway generated nearly 4 tonnes of waste. The main monitoring indicators are presented in the following table:



Waste collection (in kg) (France)

| | 2021 | 2020 | 2019 |
|---|-------|-------|-------|
| Plastic | 186 | 64 | 31 |
| Ink cartridges | 0 | 13 | 22 |
| Paper & cardboard | 3,429 | 2,823 | 7,195 |
| Cans | 0 | 5 | 154 |
| Bulky waste | 8 | 91 | 1,183 |
| Waste electrical and electronic equipment | 254 | 239 | 245 |

Reasonable consumption of IT equipment

Regarding IT and office equipment, new ergonomic work stations improve the quality of employees' working conditions but also optimise energy and resource consumption with less energy-consuming terminals.

Standard employee equipment -work station, office equipment- is renewed every 3 years.

As part of the roll-out of the "Future of Work" policy, Axway entered into a partnership with a leasing company which supplies equipment and connectivity. Deployed in France in November 2021, employees can equip their home working space with second-hand office equipment. This system will be rolled-out in other European countries in 2022.

IT equipment donations

In addition to recycling, donations extend the life of IT equipment and replace the production of a new model in a circular economy approach.

It therefore offers new resources to employees for their personal use or to public utility associations serving under-equipped communities.

| | 2021 | 2020 | 2019 |
|--|------|------|------|
| Donations of IT equipment, computers, screens, etc. (in units) | 656 | 360 | 500 |

Involve management in sustainability discussions

In 2021, many more Axway managers were involved in environmental impact analysis thanks to new CSR initiatives. Their involvement contributed to promoting these new competencies internally.

Energy consumption in MWh

| | 2021 | 2020 | 2019 |
|--|--------------|--------------|--------------|
| France - La Défense site, including heating/air conditioning (Enertherm) | 1,984 | 2,540 | 2,614 |
| Germany | 213 | 720 | 236 |
| Bulgaria | 679 | 566 | 803 |
| Ireland | 37 | 38 | 75 |
| Romania | 688 | 696 | 438 |
| United States | 6 | 816 | 993 |
| Total | 3,607 | 5,376 | 5,158 |

In Phoenix, the service room was outsourced from the fourth quarter in 2020. This transfer, combined with lower attendance on site explains the absence of energy consumption.

Following the signing of an energy performance contract by the owner of the La Défense premises, a new schedule of heating operating hours was put in place (shutdown in the evening and at weekends). This automatically led to a reduction in consumption of nearly 40% in 2021.

Energy consumption decreased 33% between 2020 and 2021 (including the different sources of energy and usage).

To meet its 2023 objectives, Axway has rolled out a CSR e-learning programme for all employees, incorporating environmental commitments.

Manage the energy consumption of IT servers on the Axway site

Five years ago, Axway decided to outsource the machine room for production applications for its La Défense site in France. An eco-responsible Green Label operator, Interxion was carbon neutral at the end of 2020 (www.interxion.com/fr/neutralite-carbone-2020).

For the hosting of proprietary or customer data, Axway sets up service contracts to host large volumes of data. These service contracts signed with leading market players such as Amazon AWS, Microsoft or Salesforce, enable Axway to ensure sustainability commitments and social and environmental best practices in this area.

In addition, ongoing work on Axway's sustainable purchasing process includes the direct environmental impact of Axway's main hosting providers.

Manage heating and air-conditioning energy consumption

Heating and air conditioning: as a tenant at all its sites, Axway seeks to optimise the energy performance of its facilities. When leases are renewed, the premises are equipped with modern, environmentally friendly heating and air-conditioning systems. The French headquarters located in Paris La Défense benefit from highly environmentally-friendly air conditioning and heating networks which operate using the county's waste (Enertherm).

4.1.2 Axway carbon report



Regarding the 3 carbon report scopes

The terms Scope 1, Scope 2 or Scope 3 are used in an organisation's carbon report. The carbon report is used to determine how much greenhouse gas is emitted when manufacturing a product or from the activities of an organisation over a given period according to 3 scopes:

Scope 1: direct emissions

Scope 1 encompasses greenhouse gas emissions caused directly by the manufacture of a product or a service. For example, if the manufacture of a product requires the use of oil, fuel combustion or if its production generates CO₂ or methane emissions, all these emissions are accounted for in Scope 1. These are referred to as direct emissions.

Scope 2: indirect emissions caused by energy consumption

Scope 2 encompasses greenhouse gas emissions caused by the energy consumption needed to manufacture a product or a service. For example, to manufacture a product, electricity must generally be consumed to operate the plants where the product is designed. This electrical consumption does not in itself generate any greenhouse gases. But electricity production emits greenhouse gases. All these emissions caused by secondary energy consumption are accounted for in Scope 2. This scope also includes emissions from heating and cooling networks. These are referred to as indirect emissions caused by energy consumption.

Indicators used:

- gas, fuel-oil, electricity and water consumption;
- kilometres travelled (excluding personal vehicles);
- IT equipment donations;
- waste recycling and management.

Scope 3: other indirect emissions

Scope 3 encompasses all other greenhouse gas emissions that are not directly caused by the manufacture of a product but by other stages of the product's lifecycle (supply, transport, use, end-of-life, etc.). For example, raw materials are needed to manufacture a product. The extraction and transformation of these raw materials, as well as their transportation to the production plant, generate greenhouse gases. Similarly, a product's end-of-life or recycling also generates greenhouse gases. These indirect emissions caused by the other stages of a product's lifecycle are accounted for in Scope 3. These are referred to as other indirect emissions.

Greenhouse gas emission assessment methodology (BEGES)

Axway's greenhouse gas emissions assessment (BEGES), which uses the Bilan Carbone® methodology developed by the French Environment and Energy Management Agency (ADEME), measures the impact of the Group's activities on the environment.

The 6-country scope used for the assessment covers over 80% of the total area of premises.

The BEGES was completed by an independent service provider with a Bilan Carbone® license issued by the Association Bilan Carbone (ABC) for 2021. It was drawn up based on the updated official greenhouse gas emissions assessment in accordance with version 4 of the assessment production methodology published in October 2016 by the French Ministry for Ecological Transition.

Geographic scope and network of correspondents:

- France;
- Germany;
- Romania;
- Bulgaria;
- Ireland;
- United States – Phoenix site.

Axway carbon report results

The carbon report identifies greenhouse gas emissions of **861** (T eq. CO₂):

- direct greenhouse gas emissions in CO₂ metric tons equivalent amounted to 133 (T eq. CO₂); and
- indirect greenhouse gas emissions associated with the production of imported electricity, heat or steam, in CO₂ metric tons equivalent amounted to 728 (T eq. CO₂);
- and finally, other indirect GHG emissions (line power losses) in CO₂ metric tons equivalent amounted to 97 (T eq. CO₂).

Thus, total GHG emissions by the Axway Group within the scope defined above totalled 958 (T eq. CO₂). The assessments for 2019 and 2020 were updated for 2021 with updated emission factors, as recommended by the Ministry in its methodology.

The **reported carbon footprint** on which Axway can act directly through its policy is therefore 861 (T eq. CO₂).

Estimated carbon intensity is obtained by dividing the carbon footprint in absolute terms by revenue, i.e. 2.96 T eq. CO₂/€ million of revenue.

Reported carbon footprint (absolute value)

Scope 1 & 2
861
T eq CO₂

Estimated carbon Intensity

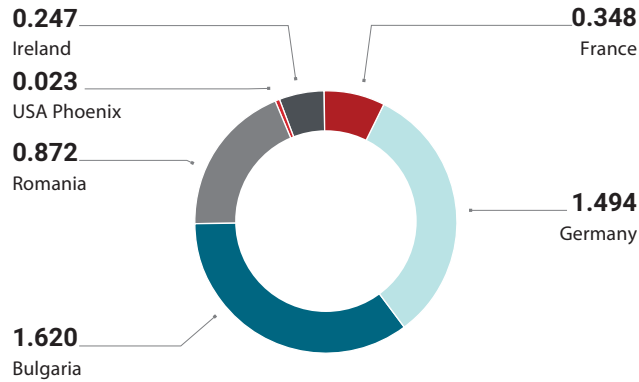
2.96
T eq CO₂/Revenue
in € million



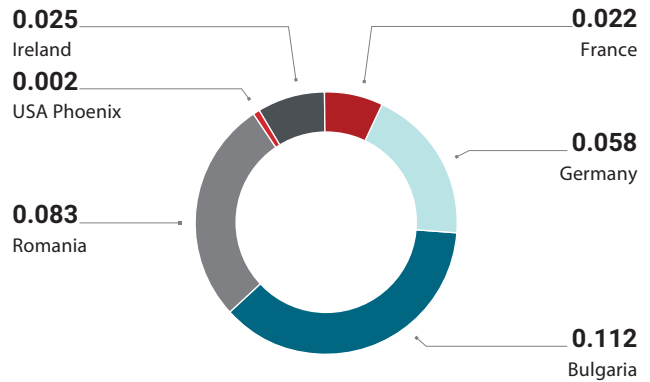
At constant structure, greenhouse gas emissions fell by 40% (639 T eq. CO₂) between 2020 and 2021.

This was most likely due to employees continuing to work from home during lockdowns due to the COVID-19 pandemic. In addition, energy regulation efforts enabled a reduction in the temperature at the Paris premises during the weekend and therefore greenhouse gas emissions.

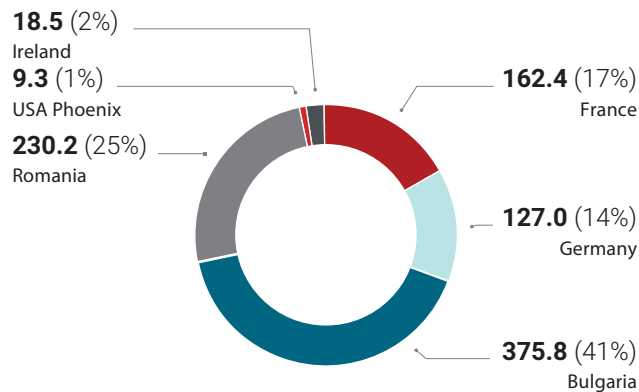
Breakdown of greenhouse gas (GHG) emissions in T eq. CO₂ by person and country



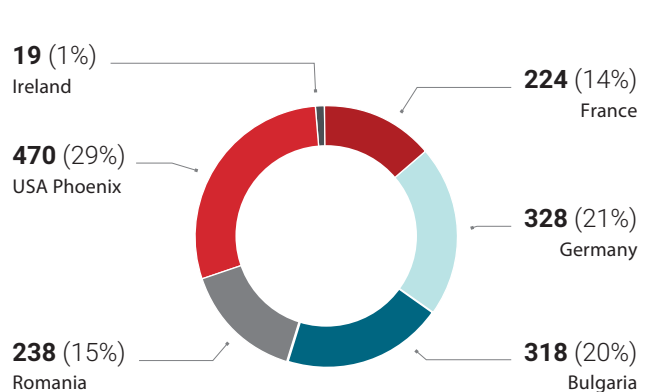
Breakdown of greenhouse gas (GHG) emissions in T eq. CO₂ by m²



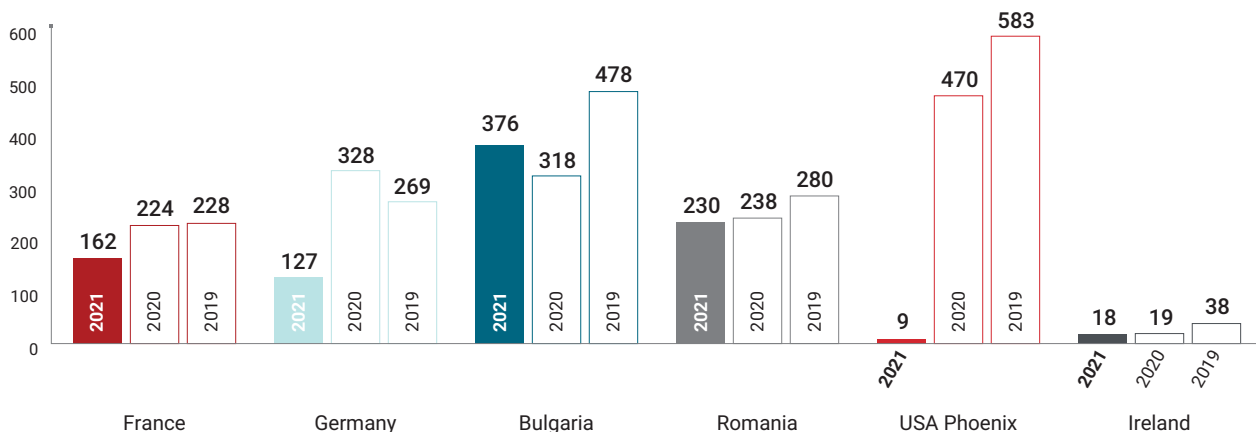
Breakdown of greenhouse gas (GHG) emissions by country in 2021



Breakdown of greenhouse gas (GHG) emissions by country in 2020



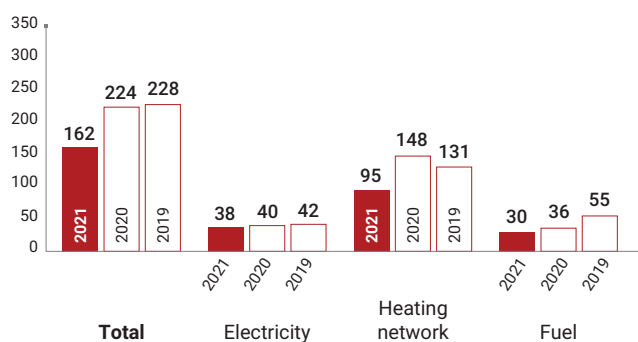
Change in greenhouse gas emissions in T eq. CO₂
By country



The decrease is significant in Germany due to a rationalisation of space and especially in the United States where new premises were occupied alongside continued working from home.

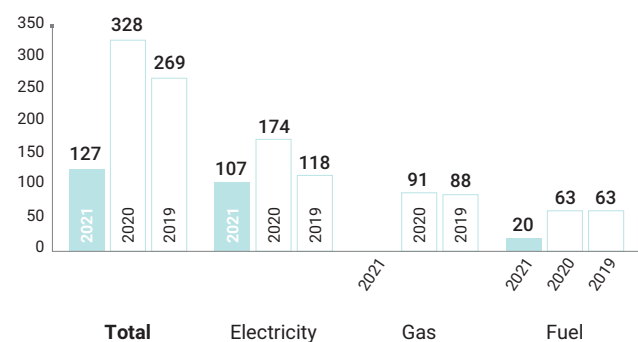
Change in GHG emissions in T eq. CO₂

France



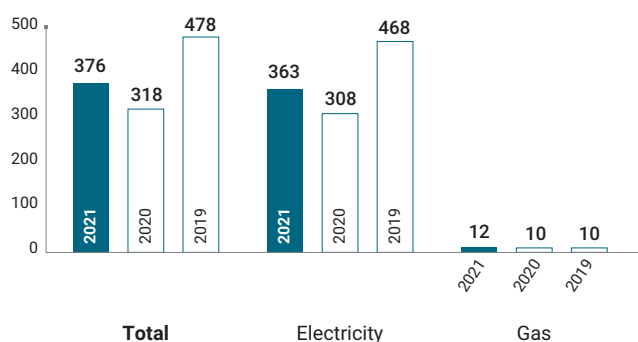
Change in GHG emissions in T eq. CO₂

Germany



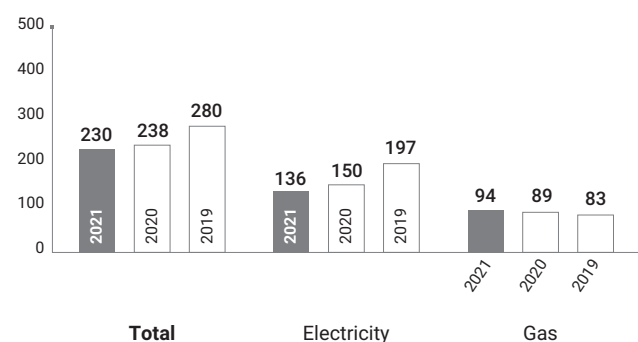
Change in GHG emissions in T eq. CO₂

Bulgaria



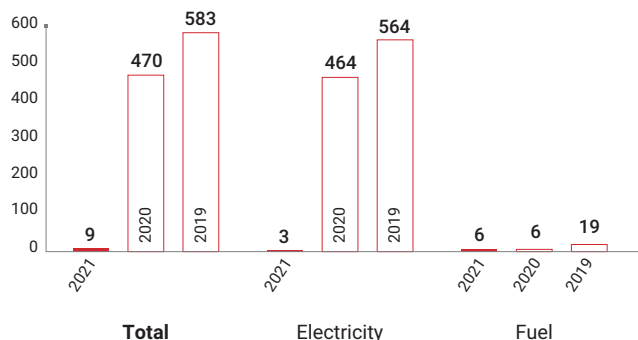
Change in GHG emissions in T eq. CO₂

Romania



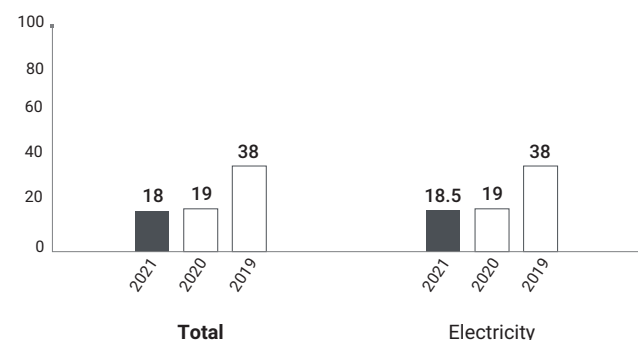
Change in GHG emissions in T eq. CO₂

USA (Phoenix)



Change in GHG emissions in T eq. CO₂

Ireland



For the first time this year, Axway performed a scope 3 analysis of its purchases of products and services used in internal activities ("Direct Impact"). The top 46 suppliers essential to our operations were selected for this first analysis. They mainly concern purchases of services, such as advisory services, communication, telecommunications, business travel and sub-contracting, as well as purchases of software licences and subscriptions and IT sub-contracting services. While limited with regard to indirect purchases, this first analysis enabled the calculation of our direct carbon footprint.

Scope 3
Non-IT purchases
3,948
T eq CO₂

Scope 3
IT purchases
1,922
T eq CO₂

4.2 Measuring our indirect impact



Two years ago, Axway began analysing the indicators relating to the environmental impact of its external activities. The initial focal points consisted in taking a “snapshot” of the areas of activity and tools requiring environmental resources.

Axway's various businesses and functions are

- software design and research & development;
- data hosting;
- software deployment and installation at customer sites;
- services;
- maintenance;
- product life cycle.

Tools used by Axway

- For the development of Axway software and its installation at customer sites to measure and help reduce impacts;
- applications, e.g. to reduce the cloud computing requirements of our software;
- IT hardware and equipment for work stations;
- eco-development, open source and focused development methods;
- remote collaboration tools (e.g. Teams video conferencing app) by development teams to limit travel;
- development labels and standards incorporating responsible approaches.

The purchasing process for resources purchased externally

An initial assessment of resources purchased externally was conducted for the top four suppliers of IT resources - hosting of data and software – enabling working hypotheses to be established. Emissions relating to these four suppliers totalled 1,357 metric tonnes of CO₂ equivalent.

Scope 3
IT purchases
for customers
1.357
tCO₂ equ

In the next stage, Axway will consider the adaptations to be made when assessing the environmental policies of suppliers in order to calculate its impact.

Stakeholders involved in the Company's activities

- Customers and their expectations of Axway's CSR performance;
- suppliers in the sustainable purchasing process described in Section 3.2.3 ;
- partners in co-innovation projects.

Contribution of software developed by Axway to reducing the environmental impact of its customers

As discussed above, Axway's business model and notably its research and development activities are based on digital innovation for its customers. The digitisation of exchanges, which has largely reduced paper consumption, transport and physical processes, has greatly contributed to reducing the carbon impact.

Axway's product development and installation plan has included streamlining energy consumption since the outset.

In addition, Axway has included analysing the contribution of its software to reduce the environmental impact of its customers in its indirect impact approach. As already indicated, this work is also conducted in line with the Green Taxonomy, which categorises activities with a sustainable impact.

4.3 Green Taxonomy: eligibility of Axway's activities and investments

4.3.1 Regulatory context

In order to promote transparency and a long-term vision of economic activities and direct capital flows to sustainable investments, the European Union established a common

classification system for company activities enabling the identification of economic activities considered sustainable. This system is defined in European Regulation (EU) 2020/852 of 18 June 2020, known as the “Taxonomy Regulation”.

Definition:

An activity may be considered sustainable where it:

- contributes substantially to one or more of the following environmental objectives:
 - climate change mitigation,
 - climate change adaptation,
 - sustainable use and protection of water and marine resources,
 - transition to a circular economy, waste prevention and recycling,
 - pollution prevention and control,
 - protection and restoration of biodiversity and ecosystems;
- complies with technical screening criteria that have been established by the Commission;
- does not significantly harm any of the environmental objectives;
- is carried out in compliance with the OECD guidelines for multinational enterprises.

Reduced provisions were provided for the first year of application in 2022 (in respect of fiscal year 2021). Companies must disclose the part of their revenue, capital expenditure and operating expenditure that corresponds to so-called “eligible” economic activities, that is activities classified in the European Taxonomy. In addition, only activities contributing to the initial climate objectives have been identified (climate change mitigation and adaptation).

For fiscal year 2022 (publication in 2023), companies must publish the part of revenue, capital expenditure and operating expenditure considered “sustainable” for the first two environmental objectives, that is respecting the technical criteria related to each of the eligible activities: substantial contribution to one of the two environmental objectives, does not harm the other environmental objectives and meets minimum social guarantees.

For fiscal year 2023 (publication in 2024), companies must publish the part of revenue, capital expenditure and operating expenditure considered “sustainable” for all six environmental objectives.

Axway conducted an in-depth analysis of all its activities in its various consolidated entities. This analysis was conducted jointly by the CSR division, the finance department and the operating departments.

Scope and key indicators

Revenue, capital expenditure and operating expenditure for all Axway activities corresponding to the scope of companies under its control was considered.

Financial data is taken from the accounts at 31 December 2021 and revenue and capital expenditure can therefore be reconciled with the financial statements.

Financial indicator assessment procedure

The financial ratio denominators were defined in accordance with the definitions set out in the Delegated Act of 6 July 2021 on Article 8 of the Taxonomy Regulation.

For the numerators, there are no definitions of the expected information for eligibility. The Group therefore reasoned by analogy with the alignment ratios to determine the part of ratios eligible under the taxonomy.

4.3.2 Analysis of Axway activities and capital expenditure for the Green Taxonomy

Key Performance Indicator (KPI): Revenue by activity

At this stage of its deployment, the Taxonomy Regulation prioritises activities that have the most significant impact on climate change and that offer the greatest potential for reducing greenhouse gas emissions. To date, the Taxonomy has listed more than 80 activities accounting for 90% of greenhouse gas emissions and that therefore must make the greatest efforts to attain the EU commitment of reducing emissions by 55% by 2030 and being carbon neutral by 2050.

The regulation also sets out enabling activities, that is activities that contribute to adapting other activities by proposing products or solutions that enable the negative effects of current or future climate change to be avoided and/or limited.

Axway activities concerned**Axway, as a software publisher, is a major digital transformation player.**

The services provided as part of its software activities comprise a software user right (license), maintenance, related services and Software As a Service type subscriptions.

To better meet its customers' expectations, Axway transformed its historical Software business model (License, Maintenance and Services), moving towards a “Software As a Service” subscription-based business model enabling the use of remote servers.

Axway's Subscription activity groups together two Software As a Service offerings:

- the “**Axway Managed**” offering, which includes the use of licenses, maintenance services and the hosting of all these services. In this offering, hosting is provided by Axway or sub-contracted to a third party hosting provider; and
- the “**Customer Managed**” offering, which is a hybrid offering as the “on-premise” components (licenses) are hosted on the customer's premises or sub-contracted by the customer to a third party hosting provider, and the other Software as a Service components are hosted by Axway, or sub-contracted by Axway to a third party hosting provider.

As Axway's core business is software publishing, this business model transformation does not make Axway a traditional hosting provider. In practice, hosting services are entirely sub-contracted by Axway to leading hosting providers on the market, such as Amazon Web Services and Microsoft Azure.

In addition, Axway selects leading hosting providers that have defined an ambitious low carbon trajectory.

Work on measuring and reducing Axway's indirect impact on the environment is described in the NFPS (Non-Financial Performance Statement) in Section 4.2 of this document, together with the ambition to be "carbon neutral" by 2028.

Identification procedures

Axway identified its activities that are eligible with respect to the climate change mitigation and adaptation objectives (the "Climate objectives").

With respect to the "climate change mitigation" environmental objective, Axway analysed the following activities:

- **Activity 8.1 "Data processing, hosting and related activities"**: a part of Axway Managed revenue corresponds to this activity. However, all hosting activities performed using third party infrastructures are excluded from the application scope of the taxonomy. As Axway sub-contracts its Axway Managed hosting services, the related Group activities are not currently eligible in respect of activity 8.1.
- **Activity 8.2 "Data-driven solutions for GHG emissions reductions"**: the nature of Axway's offering would not appear to directly meet the definition of this article. However, as Axway is a digital transformation player, certain projects could be eligible provided they are supported by specific analyses demonstrating substantial greenhouse gas emission savings.

At this stage, Axway has not recognised the eligibility of its revenue for activity 8.2.

With regard to the "climate change adaptation" environmental objective, Axway analysed activity 8.1 "Data processing, hosting and related activities" and activity 8.2 "Computer programming, consultancy and related activities".

At this stage of the regulation, these activities 8.1 and 8.2 do not constitute enabling activities within the meaning of Regulation (EU) 2020/852.

Axway has not therefore recognised the eligibility of its revenue for this environmental objective.

The analysis conducted by Axway leads us to conclude that Axway's activities do not fall within the 88 highest greenhouse gas emitting activities targeted by the Taxonomy. At the same time, Axway's activities are not considered enabling activities. Nonetheless, Axway is implementing progress actions in favour of the climate, the results of which are measured through performance indicators published in Section 4 of this document.

To conclude, Axway considers that its economic activities do not substantially contribute to these first two environmental objectives. The part of revenue corresponding to eligible sales is therefore nil in fiscal year 2021.

Capital and operating expenditure

Capital expenditure Key Performance Indicator (KPI) – CAPEX

Capital expenditure corresponds to capitalised costs in respect of intangible assets and property, plant and equipment, including IFRS 16 right-of-use assets.

Group eligible capital expenditure mainly concerns private cars, IT servers and the purchase of buildings (with respect to the right-of-use).

Axway eligible capital expenditure in respect of fiscal year 2021 amounts to 38.1% out of a total of €3.7 million (see the Notes to the consolidated financial statements, Sections 8.4 and 9.1 of the 2021 Universal Registration Document).

Operating expenditure Key Performance Indicator (KPI) – OPEX

Operating expenditure is defined as direct costs that cannot be capitalised and include research and development expenditure, building renovation costs, maintenance and repair costs, lease payments expensed in the income statement and all other expenditure relating to the everyday maintenance of assets.

Group eligible operating expenditure mainly concerns short-term leases of private cars.

Axway eligible operating expenditure under the Green Taxonomy in fiscal year 2021 amounts to 0.02% out of a total of €71.0 million.

4.4 2028 environmental objectives

In 2021 Axway set its environmental commitment objectives based on the following three indicators:

- 10% reduction in paper consumption by 2023;

- employee mailbox cyber clean-up campaign to reduce the use of cloud resources;
- carbon trajectory to become carbon neutral by 2028.

Environmental Commitment

ENVIRONMENTAL

- **10% reduction in paper consumption**
in 2022 vs. 2019 (last normal year)
- **2 cyber clean up days** by 2023
- **Carbon neutrality** by 2028

Summary of Axway's CSR commitments by stakeholder, indicators

| Commitment | Programme | Indicator | SDG* | Stakeholder | | | | | Societal Organisations |
|------------|-----------------------------------|--|-------------|-------------|-----------|-----------|----------|--------------------------|------------------------|
| | | | | Employees | Customers | Suppliers | Partners | Shareholders & Investors | |
| Social | Employee engagement | Axway Voice Survey | SDG8 | x | | | | | |
| | Gender diversity | % of women in the workforce | SDG5 | x | | | | | x |
| | Disability diversity | Integration of new hires | SDG10 | x | | | | | x |
| | Talent development | Number of day's training | SDG4 | x | x | | x | | |
| | Offer a fulfilling environment | Future of Work, balance on-site/home working | SDG8 | x | x | | x | | |
| | | Dialogue and internal communication | SDG8 | x | | | | | |
| | Ensure digital security | Certificates Training Processes | SDG8 | x | x | x | x | x | x |
| | increase customer satisfaction | NPS indicator, surveys EcoVadis rating Recognition of business analysts | SDG8 | x | x | | x | | |
| | | Sustainable purchasing Ethics charter, whistle-blowing procedure | SDG8 and 16 | x | x | x | x | x | x |
| | | Consultancy, technology, integration and distribution partner programmes | SDG8 | x | | | x | | |
| Societal | Govern ethically and sustainably | Middlesex Code Securities Trading Code of Conduct Listing on Euronext Paris CAC Tech, Tech 400 indexes, Gaia Rating | SDG8 and 16 | x | x | x | x | x | |
| | Assume our digital responsibility | Skills transfer | SDG4 | x | x | x | x | x | x |
| | | Participation in educational and societal programmes Co-innovation of applications serving the public | | x | | | | | |
| | | Hackathons | | | x | | x | | x |

| Commitment | Programme | Indicator | SDG* | Stakeholder | | | | | |
|---------------|------------------------------------|--|-------------|-------------|-----------|-----------|----------|--------------------------|------------------------|
| | | | | Employees | Customers | Suppliers | Partners | Shareholders & Investors | Societal Organisations |
| Environmental | Reduce our environmental footprint | Measure | | | | | | | |
| | Carbon trajectory | Reduce | | x | | | | | |
| | | Recycle | | | | | | | |
| | | Offset | SDG13 | | x | x | x | x | x |
| Direct Impact | | By tool: video conferencing, clean-up | SDG13 | x | | | | | |
| | | By resource: paper, plastic, equipment and IT software | | x | | | | | |
| | Indirect Impact | By type of Axway activity | SDG15 | | x | x | | x | |
| | | In the European Green Taxonomy framework | SDG8 and 13 | x | x | x | | x | |

* Sustainable Development Goals

Methodology note

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

Information published concerns the entire Axway scope, unless the scope is indicated: for example the country or countries concerned. The indicators used are those of the French Grenelle II Act. The principle of consistency of accounting methods year-on-year is respected. Data is collected from the relevant departments and a continuous improvement process has been set up for those systems.

Materiality matrix

In 2020, after mapping all the stakeholders presented in Section 2.3 of the NFPS, it became apparent that the main stakeholders were customers, employees and investors. CSR challenges, commitments and related indicators were therefore defined based on their expectations. Customer expectations were identified during the Net Promoter Score (NPS) process and when responding to calls for tenders. Employee expectations are gathered from engagement surveys. Investor relations express their expectations particularly during meetings held throughout the year. Furthermore, societal expectations are also shared during working groups facilitated by Middenext and through Axway's membership of Syntec Numerique. The issues were rated by interviewing the relevant management teams using an iterative process. The analysis was also conducted in accordance with the risk approach.

This rating was reviewed in 2021 given the strengthening of certain issues, in particular environmental. The matrix was validated by the Appointments, Governance and Corporate Responsibility Committee.

Employee information

General provisions

Scope of consolidation and indicators

The workforce shown in the "Workforce" and "Workforce by Geographical Area" tables corresponds to the total number of employees at 31 December 2021. The indicators chosen are those used for personnel management and Axway's employee-related issues. They reflect the results of the Human Resources policy.

Relations with employees

Axway Software

Since 4 October 2019, employer-employee dialogue at Axway Software SA has been conducted within the framework of an SEC, Social and Economic Committee, elected for 4 years. Three trade unions (CGT, CFDT and Traid-Union) are represented on the Committee.

Labour relations at Axway GmbH

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

Overview of collective agreements

Within Axway, six agreements were in force at 31 December 2020 in France. In 2020, two agreements were signed in France and six were signed in Germany.

The following collective agreements were signed at Axway Software SA in 2020

- Amendment to the 2021-2023 profit-sharing agreement;
- Future of Work working from home agreement;
- agreement on working from home resulting from the collective bargaining agreement of 31 July 2017 on the transformation of the Annecy site.

Six collective agreements were signed at Axway GmbH in 2021 with the works council.

General Works Council Agreements - 2021:

- GBV Bonus plan;
- GBV Commission plan;
- GBV Remote Work Agreement;
- GBV Secret Server.

Local Works Council Agreements - 2021 (3 locations):

- BV Compensation - Distributing policy;
- BV On Call Duty.

Health and safety information



Scope of consolidation and indicators

The safety indicators concern all Axway sites. 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.

Health and safety conditions at Axway Software

In 2020, there were:

- two commuting accidents with lost time.

Preserving the health and safety of employees is a fundamental goal and an integral part of the Human Resources and social policy. The objective is 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

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

Good practice awareness-raising actions concerning work and particularly on-screen work could not be undertaken in 2020 due to the COVID-19 health context.

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. It regularly continues this work, monitoring the situation. Following the assessment in 2020, the Single Document was updated to include risks relating to the health crisis.

Certificate of disclosure by an Independent Third Party

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

Verifying auditor's report

Year ended 31 December 2021

Dear 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 2021 (hereinafter the "Statement"), presented in the Axway 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.

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 Code of Ethics of the 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 consistency of the Statement with the provisions of Article R. 225-105 of the French Commercial Code;
- the fairness of the information provided pursuant to 3° of Article R. 225-105 I and II of the French Commercial Code, i.e. the outcome of the policies, including key performance indicators, and the measures implemented in light of the principal risks (hereinafter the "Information").

However, it is not our responsibility to comment 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 compliance of products and services with the applicable regulations.



Nature and extent of 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 25 February and 9 March 2022 and took approximately five man-days.

We conducted five 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 covers each category of information provided for in Article L. 225-102-1 III in social and environmental matters, as well as respect for human rights and the fight against corruption and tax evasion;
- 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 Declaration presents the business model and the main risks related to the activity of all entities included in the scope of consolidation, including, where relevant and proportionate, the risks created by its business relationships, products or services as well as its policies, actions and results, including key performance indicators;
- we verified, when they are relevant to the main risks or the policies presented, that the Statement presents the information provided for in Article R. 225-105 II;
- we assessed the selection and validation process of the main risks;
- we asked about the existence of internal control and risk management procedures put in place by the entity;
- we assessed the consistency of the results and key performance indicators adopted in view of the main risks and 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 collection process implemented by the entity for the completeness and sincerity of Information;
- for the key performance indicators and other quantitative results that we considered to be the most important, we implemented:
 - analytical procedures consisting in verifying the proper consolidation of the data collected and the consistency of any changes in 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 with a selection of contributing entities⁽¹⁾ and covers between 43% and 100% of the consolidated data relating to the key performance indicators and outcomes selected for these tests⁽²⁾;
 - 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 we carried out in exercising our professional judgement allows us to make a conclusion of moderate assurance; a higher level of assurance would have required more extensive work.

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, we did not identify any material anomalies that call into question the preparation of the non-financial performance statement in accordance with the applicable regulatory provisions and that the Information, taken as a whole, is presented fairly and in accordance with the Guidelines.

Lyon, 10 March 2022

Finexfi

Isabelle Lhoste

Partner

(1) Axway Software SA, Axway US

(2) 3.2.1 Human Resource key figures (Recruitment and Turnover), 3.2.2.2 Diversity and equality in Axway (Gender diversity of teams), (Age diversity: without discriminating against younger and more senior employees), (Recruitment by geographical area), (Recruitment by age), 3.2.3.2 Future of Work, a flexible and sustainable approach to working (Making working time more flexible), 3.4.1.1 Resource management processes (Number of video conferences), (Reasonable consumption of paper, plastic and cardboard), (Waste recycling and processing), (Manage heating and air-conditioning energy consumption).

Employee and environmental information cross-reference table

| Article 225 and Decrees of 19/08/2016 and 09/08/2017 | | | Axway NFPS | |
|--|---|--------------------------|--|---|
| GP ⁽¹⁾ | General reporting principles | Page * | Name | Comment |
| GP1 (A. R. 225-105. I-) | The NFPS mentioned in I of Article L. 225-102-1 and the consolidated non-financial performance statement mentioned in II of the same Article present the business model of the Company or, as the case may be, of all the companies for which the Company prepares consolidated financial statements. | Profile pages 2-13 | Business model | |
| GP2 (A. R. 225-105. I-) | For each information category, they also present: 1° A description of the main risks related to the business of the Company or of the group of companies, including, where 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, the due diligence procedures implemented to prevent, identify and mitigate the occurrence of the risks mentioned in 1°; 3° The results of these policies, including key performance indicators. (Decree of 09/08/2017) | Chapter 2 pages 24-38 | Risk factors | See specifically the Sections in Chapter 2 |
| GP3 (A. R. 225-105. I-) | Where the Company does not have a policy with respect to one or more of these risks, the statement includes a clear and reasoned explanation of the reasons justifying this. (Decree of 09/08/2017). | | | Axway applies a policy to all risks that affect it. |
| GP4 (A. R. 225-105.1 I-) | The information published is presented "in such a way as to allow a comparison of the data" (Law of 12/07/2010). The Report of the Board of Directors or Management Board "presents the data observed during the financial year ended and, if necessary, during the previous financial year, so as to allow a comparison between this data". (Decree of 24/04/2012). | | | See specifically the Sections in Chapter 2 |
| GP5 (A. R. 225-105.1 II-) | When a company voluntarily complies with a national or international reference system in order to fulfil its obligations under this Article, it mentions this fact, indicating the recommendations of this reference system that have been adopted and the procedures for consulting it. (Decree of 24/04/2012) | pages 48-49 | Support for the Global Compact Adhesion to the Middenext Code | |
| GP6 (A. R. 225-105.1 III-) | Without prejudice to the disclosure requirements applicable to the report provided for in Article L. 225100, these statements are made freely available to the public and easily accessible on the Company's website within eight months of the end of the financial year and for a period of five years. (Decree of 09/08/2017). | Group website | | https://investors.axway.com/en and https://investors.axway.com/fr |
| GP7 (A. R. 225-105.2 I-) | The independent third party mentioned in V of Article L. 225-102-1 is appointed, as the case may be, by the Chief Executive Officer or the Chairman of the Management Board, for a period not exceeding six financial years, from among the bodies accredited for this purpose by the French Accreditation Committee (COFRAC) or by any other accreditation body that is a signatory to the multilateral recognition agreement established by the European Coordination of Accreditation Bodies. The independent third party is subject to the incompatibilities provided for in Article L. 822-11-3. | pages 80-81 | Certificate of disclosure and opinion of fairness concerning social, societal and environmental information. | |
| GP7 (A. R. 225-105.2 II) | When the information is published by companies whose thresholds exceed €100 million for the balance sheet total or €100 million for the net revenue and 500 for the average number of permanent employees employed during the financial year, the report of the independent third party includes: a) A reasoned opinion on the conformity of the statement with the provisions of I and II of Article R. 225-105, as well as on the fairness of the information provided pursuant to 3° of I and II of Article R. 225-105; b) The due diligences carried out in conducting the verification procedures. (Decree of 09/08/2017). | | | |

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Article 225 and Decrees of 19/08/2016 and 09/08/2017

Axway NFPS

| GP ⁽¹⁾ | General reporting principles | Page * | Name | Comment |
|------------------------------|---|--------|------|---------|
| GP8 (A. L. 225-102-1. IV) | The defined companies which are under the control of a company which includes them in its consolidated accounts in accordance with Article L. 233-16 are not required to publish a statement on non-financial performance if the Company that controls them is established in France and publishes a consolidated statement on non-financial performance or if the Company that controls them is established in another Member State of the European Union and publishes such a statement pursuant to the legislation to which it is subject. (Order of 19/07/2017). | | | |
| GP9 (A. L. 225-102-1. V) | For companies whose balance sheet total or revenue and number of employees exceed the thresholds set by decree of the French Council of State (<i>Conseil d'État</i>), where applicable on a consolidated basis, the information contained in the statements is verified by an independent third party, in accordance with the procedures set by decree of the French Council of State. This verification gives rise to a notice which is sent to the shareholders at the same time as the report referred to in the second paragraph of Article L. 225-100. (Order of 19/07/2017). | | | |

Employee information

| | | |
|----------|---|--------------|
| I.a) | Employment | |
| I.a) 1.1 | Total workforce | page 52 |
| I.a) 1.2 | Breakdown of employees by gender | page 52 |
| I.a) 1.3 | Breakdown of employees by age | page 54 |
| I.a) 1.4 | Breakdown of employees by geographic area | page 52 |
| I.a) 2.1 | Recruitment | pages 44-48 |
| I.a) 2.2 | Redundancies | Non material |
| I.a) 3.1 | Compensation | page 60 |
| I.a) 3.2 | Change in compensation | page 60 |
| I.b) | Organisation of work | |
| I.b) 1 | Organisation of working time | page 57 |
| I.b) 2 | Absenteeism | page 57 |
| I.c) | Health and safety | |
| I.c) 1 | Health and safety conditions at work | page 80 |
| I.c) 2.1 | Frequency and seriousness of workplace accidents | page 80 |
| I.c) 2.2 | Occupational diseases | Non material |
| I.d) | Relations with employees | |
| I.d) 1 | Organisation of social dialogue, in particular the procedures for informing staff, consulting and negotiating with them | page 79 |
| I.d) 2 | Review of collective agreements, particularly in the area of health and safety at work | page 79 |

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| Article 225 and Decrees of 19/08/2016 and 09/08/2017 | | | Axway NFPS | |
|--|---|--------------|--------------|---|
| GP ⁽¹⁾ | General reporting principles | Page * | Name | Comment |
| I.e) | Training | | | |
| I.e) 1 | Training policies implemented, including environmental protection policies. | pages 53-55 | | |
| I.e) 2 | Total number of training hours | page 53 | | |
| I.f) | Equal treatment | | | |
| I.f) 1 | Measures taken in favour of gender equality | page 46 | | |
| I.f) 2.1 | Measures taken in favour of employment | page 56 | | |
| I.f) 2.2 | Measures taken for the integration of people with disabilities | page 48 | | |
| I.f) 3 | Anti-discrimination policy | pages 46-49 | | |
| Environmental information | | | | |
| II.a) | General environmental policy | | | |
| II.a) 1.1 | Organisation of the Company to take environmental issues into account | pages 70 | | |
| II.a) 1.2 | Environmental evaluation or certification procedures | page 62 | | EcoVadis |
| II.a) 2 | Resources dedicated to the prevention of environmental risks and pollution | Non material | Non material | Axway is not affected by this point due to its tertiary activity. |
| II.a) 3 | Provisions and guarantees for environmental risks | | | |
| II.b) | Pollution | Non material | Non material | |
| II.b) 1.1 | Prevention, reduction, repair measures: AIR | | | |
| II.b) 1.2 | Prevention, reduction, repair measures: WATER | | | |
| II.b) 1.3 | Prevention, reduction, repair measures: SOIL | | | |
| II.b) 2 | Consideration of any form of contamination specific to any activity, notably sound and light disturbances | | | |
| II.c) | Circular economy | | | |
| II.c).i) | Waste prevention and management | pages 70-71 | | |
| II.c).i) 1 | Measures of prevention, recycling, reuse, other forms of waste recovery and disposal | pages 70-71 | | |
| II.c).i) 2 | Actions in the fight against food waste | Non material | Non material | The premises in La Defense (France) have a company restaurant committed to the fight against food waste ⁽²⁾ . |
| II.c).ii) | Sustainable use of resources | | | |
| II.c).ii) 1.1 | Water consumption | Non material | Non material | Axway uses only water for sanitary purposes in its tertiary activity. The premises are equipped with efficient technology in this area. |
| II.c).ii) 1.2 | Water supply in keeping with local constraints | | | Axway does not operate in countries where the use of water is restricted. |
| II.c).ii) 2.1 | Raw material consumption | Non material | Non material | Axway only uses paper and office supplies for its tertiary activity. |
| II.c).ii) 2.2 | Measures taken to improve efficiency of use | | | |
| II.c).ii) 3.1 | Energy consumption | page 70 | | |
| II.c).ii) 3.2 | Measures taken to improve energy efficiency | | | |
| II.c).ii) 3.3 | Measures taken to improve the use of renewable energies | | | |
| II.c).ii) 4 | Soil use | Non material | Non material | Axway is not affected by this point due to its tertiary activity. Axway leases its premises and does not carry out any construction work. |

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| Article 225 and Decrees of 19/08/2016 and 09/08/2017 | | | Axway NFPS | |
|--|--|--------------------|--------------|---|
| GP ⁽¹⁾ | General reporting principles | Page * | Name | Comment |
| II.d) | Climate change | | | |
| II.d) 1 | The significant greenhouse gas emissions generated by the Company's activities, in particular by the use of the goods and services it produces | pages 69, 72-74 | | Scope: France, Germany, Bulgaria, Romania, USA (Phoenix), Ireland |
| II.d) 2 | Adaptation to the consequences of climate change | Non material | Non material | Axway is not directly concerned by this point, but its products and services enable some of its customers to adapt to climate change (for example: management of local authorities' data flows to optimise the multi-modal mobility of their citizens). |
| II.d) 3 | Voluntary medium- and long-term reduction targets set to reduce greenhouse gas emissions and the means implemented to this end | page 68 | | |
| II.e) | Protection of biodiversity | | | |
| II.e) 1 | Measures implemented to protect and conserve biodiversity | Non material | Non material | Axway is not affected by this point due to its tertiary activity. |
| Societal information | | | | |
| III.a) | Societal commitments in favour of sustainable development | pages 63-67 | | |
| III.a) 1 | The impact of the Company's activity in terms of employment and local development | page 54 | | |
| III.a) 2 | The impact of the Company's activity on neighbouring or local communities | Non material | Non material | Axway is not affected by this point due to its tertiary activity. |
| III.a) 3 | Relationships with the Company's stakeholders and the methods of dialogue with them | pages 63, 67 | | |
| III.a) 4 | Partnership and corporate patronage initiatives | pages 64 | | |
| III.b) | Subcontractors and suppliers | | | |
| III.b) 1 | Integration of social and environmental criteria in the purchasing policy | page 65 | | |
| III.b) 2 | Integration of social and environmental responsibilities in relations with suppliers and subcontractors | pages 65 | | |
| III.c) | Fair practices | pages 66-67 | | |
| III.c) | Measures taken for consumer health and safety | Non material | Non material | Axway is not affected by this point due to its tertiary activity. Its products and services have no impact on the health and safety of consumers. |

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| Article 225 and Decrees of 19/08/2016 and 09/08/2017 | | | Axway NFPS | |
|--|---|--------------|--------------|--|
| GP ⁽¹⁾ | General reporting principles | Page * | Name | Comment |
| Information on the fight against corruption and tax evasion⁽²⁾ | | | | |
| | Actions taken to prevent corruption | | | |
| Information on actions in favour of human rights | | | | |
| V.a) | Promoting and complying with the Fundamental Conventions of the International Labour Organisation (ILO) | page 48-49 | | Adhesion to the Global Compact |
| V.a) 1 | Respecting freedom of association and the right to collective bargaining | Non material | Non material | Axway is committed to these issues through its adhesion to the Global Compact, but does not have any operations in countries considered high risk. |
| V.a) 2 | Elimination of employment and professional discrimination | | | |
| V.a) 3 | Elimination of forced or compulsory labour | | | |
| V.a) 4 | Effective abolition of child labour | | | |
| V.b) | Other actions taken in favour of human rights | | | |

(1) GP: General Reporting Principles.

(2) The following themes (to be addressed obligatorily in the NFPS): fighting against food insecurity respect for animal welfare and responsible, fair and sustainable food are not material for Axway

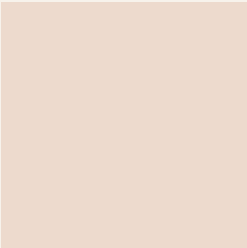
(3) The Group is tax-transparent and wishes its tax policy to be an inherent part of its corporate responsibility strategy The Group therefore adopts a civic behaviour that consists not only in complying with the legislation, but above all in making a fair contribution to the countries in which it operates.

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That's Us. That's Axway.

Axway turns your heritage infrastructure into brilliant digital customer experiences, extending the value of your previous investments, adding new business capabilities, and putting you on a future-proof platform to drive your growth ambitions. For over 20 years, Axway's mission-critical solutions have been crucial to your customers' daily lives and, together, we'll continue to delight them for the next 20.



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