

20



Corporate  
Responsibility  
Report

22

# Corporate responsibility

## Non-financial performance statement AFR/NFPS

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# A word from Management



**Pierre PASQUIER**

Chairman of the Board  
of Directors

“ Axway  
successfully combined  
experience, agility  
and commitment to  
operational efficiency  
to prove the relevance  
of its renewed  
business model. ”

2022 will have been a pivotal year in Axway's renewal. In a persistently complex macroeconomic and geopolitical environment, the Company maintained a consistent strategic trajectory to consolidate its position as a globally recognised leader in data integration and flow management for large organisations. During the year, Axway successfully combined experience, agility and commitment to operational efficiency to prove the relevance of its renewed business model and comfortably exceed its targets.

Thanks to the successful refocus of its product portfolio in 2022, Axway is now concentrating on its key offerings to respond ever more effectively to the needs of the large companies it supports.

This strategy, through which Axway aims to become the reference partner for its customers in their digital transformation, enables the Company to grow a solid base of recurring revenue year after year, supported by the continued progression of its Subscription-based offerings. In fact, Axway has reached a record level of revenue in 2022 while significantly improving its profitability.

Creating value for all of the Company's stakeholders remained a top priority during the year. In addition to its excellent financial results, Axway once again improved its level of customer satisfaction thanks to the tireless commitment of its employees. More broadly, Axway continues to emphasise its corporate responsibility through ambitious social, societal and environmental commitments and has made non-financial performance a central focus of its project for the coming years.

The management team, led by Patrick Donovan, has drawn up a clear roadmap for 2023 and is already looking ahead with determination. In a particularly competitive environment, Axway must continue to generate growth and profitability in order to be able to write a new chapter in its history by approaching the symbolic level of €500 million in revenue. This will require external growth.

The governance bodies for which I am responsible will, as always, support an independent and engaged project, capitalising on the experience of a long but successful transformation to seize the best development opportunities for Axway.

I am very proud of Axway's performance in 2022. Thanks to a historic fourth quarter, we were able to end the year very positively, exceeding all the objectives we had set ourselves. This success confirms the relevance of our strategic choices over the past five years and rewards the exemplary execution of our teams in the field, who have been able to turn the tables with our 11,000 customers around the world.

Throughout the year we have focused on improving our operational efficiency and this has resulted in several major developments. On the offering side, we worked to streamline our portfolio by divesting or discontinuing solutions that no longer met our growth or profitability expectations. We also acquired DXchange.io, a cloud integration platform that can be leveraged by all of our core products. At the same time, we continued to evolve our organisation by finalising the implementation of a matrix management structure, by region and major product line, which provides enhanced visibility into our operations and markets.

The value we create for enterprises continues to grow and naturally translates into a new all-time high in the satisfaction of our customer base. The increase in total contract value and average length of subscription signatures is a true reflection of this trend and bodes well for the future. Our ambition has always been to accompany the companies that place their trust in us over the long term, by establishing ourselves as a key partner in their digital transformation, and in 2022 we have more than ever met this challenge.

We are now entering 2023 confident that these promising trends will continue. Our company project is based on the solid foundations we have built with our employees since 2018, and this year it will be about continuing to leverage our strengths to confirm our status: that of a software publisher that is a pioneer in its markets, recognised for the quality of its offerings and services, agile enough to support the world's largest organisations in all the challenges related to the management of their critical data.

**Patrick DONOVAN**

Chief Executive Officer

**“ The value we create for enterprises continues to grow and naturally translates into a new all-time high in the satisfaction of our customer base. ”**

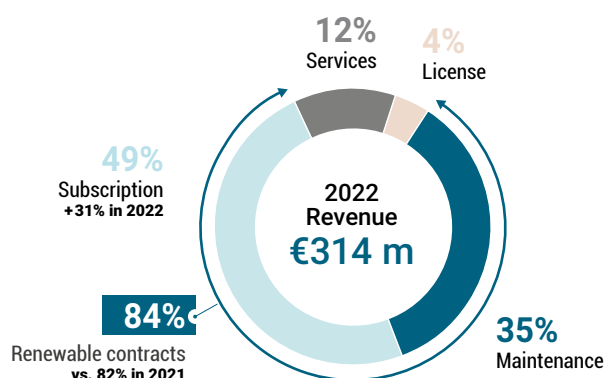


# Business lines

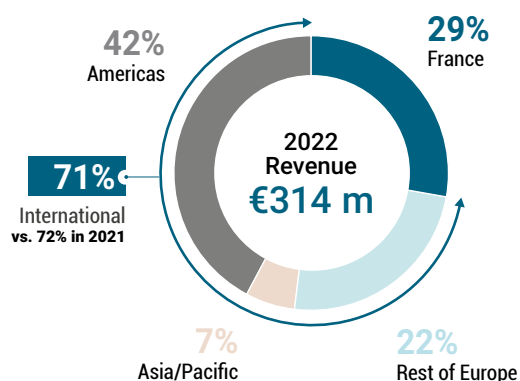
## Our mission

Securely move, integrate or expose the data of large enterprises.

### REVENUE BY ACTIVITY



### REVENUE BY GEOGRAPHY



**3<sup>rd</sup>** LARGEST HORIZONTAL SOFTWARE PUBLISHER IN FRANCE  
Top 250 Numeum - EY 2022.

Axway, a recognised leader:

**Gartner® Magic Quadrant™ for Full Life Cycle API Management**

Shameen Pillai, Kimihiko Iijima, Mark O'Neill, John Santoro, Paul Dumas, Akash Jain, 14 November 2022.

**The Forrester Wave™: API Management Solutions, Q3 2022**

The Forrester Wave™, 23 August 2022.

“According to Gartner, Full life cycle API management remains a dynamic and thriving market with substantial potential for both investors and vendors looking to create and manage APIs as add-ons to their offerings.”

Further information can be found in Chapter 1 of the 2022 Universal Registration Document.

## 2023 Priorities

01

**Employee Engagement**  
Ensure a good understanding of the strategy to maximise engagement.



02

**Operational Efficiency**  
Constantly improve processes and optimise resources.



03

**Product Portfolio Agility**  
Maintain a solutions catalogue aligned with strategic ambitions.



Further information can be found in Chapter 1 of the 2022 Universal Registration Document.

# Offers & Customers

## Our product portfolio

### TRUSTED FOR DECADES. BUILT FOR TOMORROW.

#### Amplify API Management Platform

An independent and secure platform for managing APIs across teams, the hybrid cloud and third-party gateways

#### Managed File Transfer (MFT)

Secure, reliable, and easy-to-manage solution for transferring data between people, partners, businesses, and applications.

#### B2B Integration

A secure, API-enabled approach to EDI that lets enterprise respond faster to evolving business demands.

#### Axway Financial Accounting Hub

Accelerate digital finance transformation by reducing finance information system complexity.

#### Specialised products

Visibility, intelligence, and security throughout the digital ecosystem.

**11,000** CUSTOMERS  
in 100+ countries



Financial services



Manufacturing



Retail



Public sector



Transport & Logistics

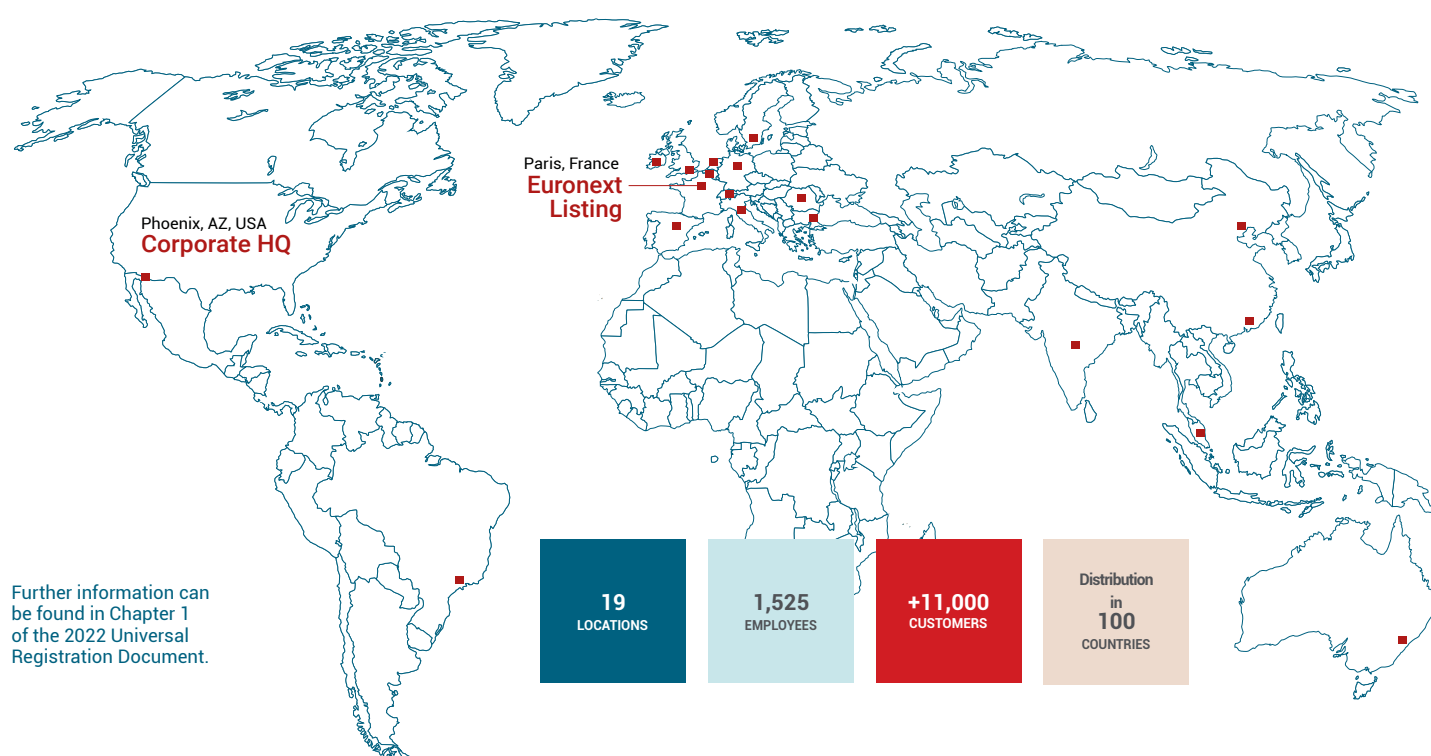


Healthcare

Customer satisfaction  
as a company value

**35**  
NET  
PROMOTER  
SCORE  
+6 pts vs. 2021

## Axway around the world



# Operating indicators

## Revenue & Results

### Revenue



#### CONTRACT RENEWAL RATE

**94%**

Renewed or moved to Subscription

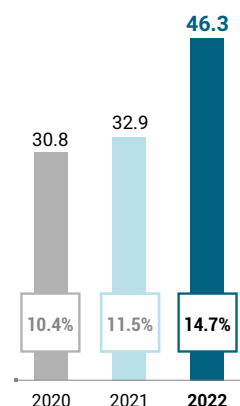
#### AVERAGE MIGRATION MULTIPLIER

**2.1x**

Maintenance moving to Subscription

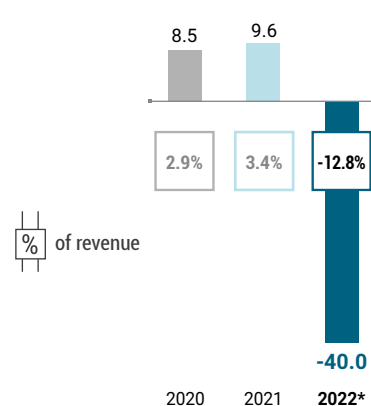
### Profit on operating activities

(in millions of euros)



### Net profit

(in millions of euros)

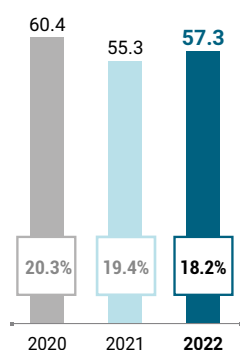


\* Including the impact of disposals.

## Investments

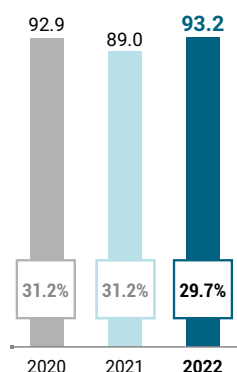
### Research & Development

(in millions of euros)



### Sales & Marketing

(in millions of euros)



### Net debt

**€69.5 M**

vs. €36.5 M at 31/12/2021

### Cash & equivalents

**€18.3 M**

vs. €25.4 M at 31/12/2021

### Total equity

**€327.8 M**

vs. €372.2 M at 31/12/2021

## 2023 Targets & Outlook

### 2023 OBJECTIVES

- Organic revenue growth of between **0 and 3%**
- Profit on operating activities representing **15 to 18%** of revenue

### MID-TERM AMBITION

- Profit on operating activities **≈ 20%**
- Revenue **≥ €500 M** (including M&A)

Further information can be found in Chapter 1 of the 2022 Universal Registration Document.  
Alternative performance measures are defined in the document glossary.



# Stock market & Share capital

## Stock market profile

### Investor Relations Contacts

- A dedicated team and website  
[investors.axway.com](https://investors.axway.com)
- Constant straight-forward dialogue  
[investorrelations@axway.com](mailto:investorrelations@axway.com)
- Discussions and meetings with the financial community throughout the year

**AXW**  
LISTED  
EURONEXT

**Euronext Paris – Compartment B**  
Bloomberg : AXW-FR  
Reuters : AXW.PA  
Market capitalisation at 31/12/2022: €360 M

**Main Euronext indices:**  
CAC ALL Shares  
CAC TECHNOLOGY  
EN FAMILY BUSINESS  
EN TECH CROISSANCE

### Basic earnings per share (in euros)



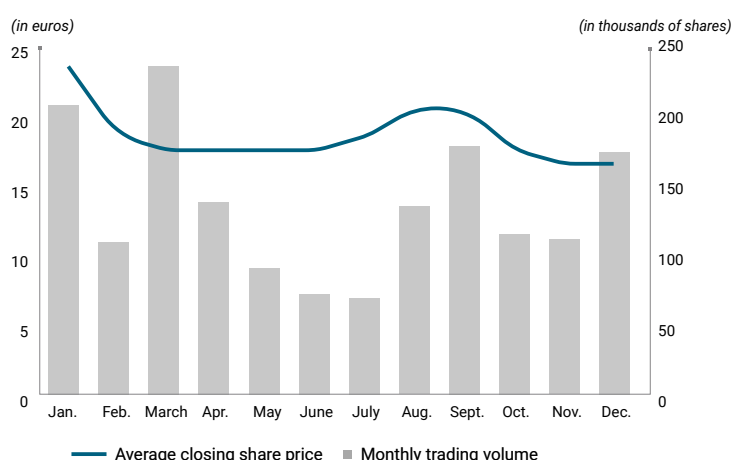
\* Restated for the impact of disposals, basic earnings per share would have reached €1.47.

### Dividend (in euros)



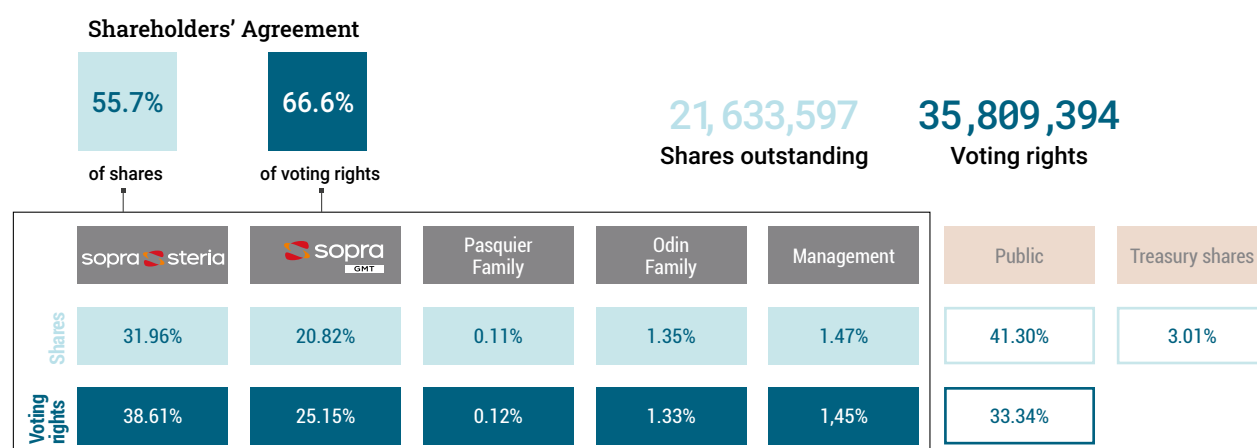
\*\* Submitted to shareholders' vote at the General Meeting of 11 May 2023.

### Share price and monthly trading volumes in 2022

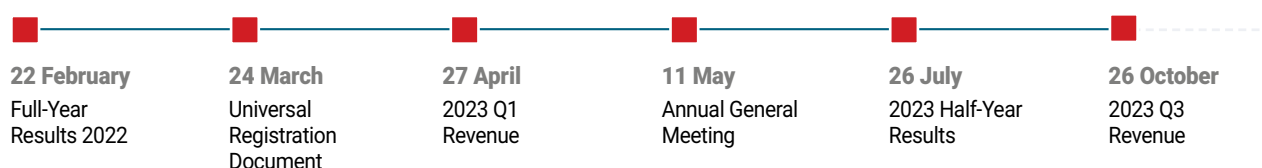


## Share capital

Share ownership at 31 December 2022



### 2023 Financial Calendar



Further information can be found in Chapters 7 and 8 of the 2022 Universal Registration Document



# 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	Independent Director	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		87	French		1		M		2023	0
Kathleen Clark Bracco		55	American French		1		P	M	2023	7,355
Pierre-Yves Commanay		57	French		0		M	M	2026	2,816
Hervé Déchelette		77	French	I	0	M	M		2023	22,734
Nicole-Claude Duplessix		63	French		0			M	2025	1,540
Emma Fernandez		59	Spanish	I	1			M	2023	0
Michael Gollner		63	American British	I	1	M			2025	100
Helen Louise Heslop		53	British	I	1	M			2023	0
Pascal Imbert		64	French	I	1		M	P	2023	340
Véronique de la Bacherie		63	French	I	0	M			2023	0
Yann Metz-Pasquier		34	French		0	M			2026	11,877
Marie-Hélène Rigal-Drogerys		52	French	I	1	M			2026	0
Hervé Saint-Sauveur		78	French	I	0		P		2023	900
Yves de Talhouët		64	French	I	1		M	M	2023	0

### Main topics covered in 2022

- Corporate strategy and associated budget;
- Acquisition and disposal transactions;
- Approval of the annual and half-year financial statements;
- Quarterly results and related financial reports;
- Workplace and wage equality;
- Social and environmental responsibility objectives;
- Composition of the Board and its committees;
- Amendment of the self-assessment questionnaire;
- In-depth implementation of the ethics and anticorruption internal systems;
- Qualification of directors as independent;
- Company officer and director compensation;
- Grant of free shares to employees;
- Analysis of the minority shareholders' vote at the 2022 General Meeting;
- Legal monitoring: EU Green taxonomy, Waserman law.

Further information can be found in Chapter 4 of the 2022 Universal Registration Document

**I** Independent Directors

**P** Chairman/Chairwoman **M** Member

**14**  
members

**4**  
nationalities

**64%**  
independents  
directors

**43%**  
women

**8**  
meetings

**96%**  
attendance

## Executive Committee

**7**  
members

**29%**  
women

**3**  
nationalities



**Patrick Donovan**  
Chief Executive Officer  
USA - France



**Roland Royer**  
Chief Customer  
Officer - France



**Cécile Allmacher**  
Chief Financial Officer  
France



**Vince Padua**  
Chief Technology & Innovation  
Officer - USA



**Dominique Fougerat**  
EVP People & Culture  
France



**Marc Fairbrother**  
EVP Research & Development  
UK



**Paul French**  
Chief Marketing Officer  
USA



### AUDIT COMMITTEE

**7**  
members

**5**  
meetings

**97%**  
attendance

#### AMONG THE DUTIES PERFORMED IN 2022

- Review the financial statements including the green taxonomy;
- Review the general risk map;
- Monitor internal audit procedures and statutory auditor procedures;
- Supervise and monitor anti-corruption procedures;
- Monitor the implementation project for the new financial information system.



### APPOINTMENTS, GOVERNANCE AND CORPORATE RESPONSIBILITY COMMITTEE

**6**  
members

**5**  
meetings

**100%**  
attendance

#### AMONG THE DUTIES PERFORMED IN 2022

- Assess the Board of Directors' activities & propose amendments;
- Verify the application of rules of ethics and good governance;
- Assess the status of the independent members of the Board of Directors particularly with regard to conflicts of interest;
- Assess corporate responsibility commitments, and the NFPS;
- Prepare the agenda of the General Meeting;
- Provide a training plan to members of the Board;
- Lead the review of regulatory documents and the Articles of Association;
- Prepare deliberations of the Board of Directors on professional and employee equality;
- Assess the proper performance of whistle-blowing procedure;
- Ensure the classification and monitoring of current and regulated agreements.



### COMPENSATION COMMITTEE

**6**  
members

**4**  
meetings

**100%**  
attendance

#### AMONG THE DUTIES PERFORMED IN 2022

- 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



Annual adhesion to the United Nations - Global Compact

Learn more about the UN Global Compact  
[www.unglobalcompact.org](http://www.unglobalcompact.org)

### Labels and certifications

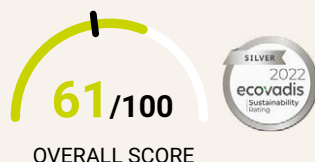


middlenext



Business ethics  
Whistle-blowing system

### EcoVadis



### SDGs to which Axway is committed



Further information can be found in Chapter 3 of the 2022 Universal Registration Document.

## EMPLOYER

### Commitment

Continue to shape the Company we want to work for

### DIVERSITY IN THE WORKPLACE at 31/12/2022



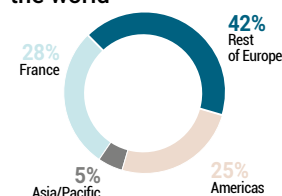
#### Women

- 31% of total headcount vs. 30% in 2021
- 26% of managers vs. 14% in 2021

#### People with disabilities

- 1.8% of France headcount vs. 1.7% in 2021

#### Employees around the world



Research & Development  
32%  
of employees

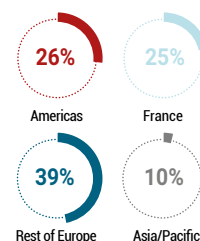
Customer Success Organisation  
50%  
of employees

### FUTURE OF WORK

- 100% of employees working from home according to their wishes
- Flexibility 60% home office / 40% on-site

### RECRUITMENT

- 202 new employees vs. 204 in 2021
- 99% permanent contracts
- 27% women vs. 33% in 2021



### TALENTS DEVELOPMENT

- 20,983 training hours vs. 29,915 in 2021
- 2.0 days of training vs. 1.9 in 2021
- 62% e-learning vs. 77% in 2021
- Training in ethics and responsibility

### EMPLOYEE ENGAGEMENT

Annual survey

	2022	2021	2020
Participation rate	72%	79%	86%
Employee engagement score	61%	66%	69%

### CSR TARGETS



2023/  
2028

## EMPLOYER

- ✗ ■ Employee Engagement Score > 70% in 2023
- ✗ ■ 33% of women in total headcount in 2023
- ✗ ■ +25% of people with disabilities in France in 2023

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

## SOCIETAL

### Commitment

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



Ecovadis

### STAKEHOLDER RELATIONS

#### Employees

support knowledge sharing initiatives.

#### Customers

**NPS 35** vs. 29 in 2021  
constant increase in customer satisfaction.

#### Civil society

- programmes to raise awareness among women of digital careers.
- programmes to promote the integration of people in the digital industry

#### Shareholders

communicate according to transparency best practices.

#### Suppliers

share ethical tools and integrate 100 suppliers in carbon measurement

#### Partners

co-innovation and sharing responsible values.

### RESPONSIBLE PURCHASING

Strengthen the system, integrate new CSR indicators, training for purchasers.

## ENVIRONMENTAL

### Commitment

Contribute to climate change mitigation

### IMPACT ASSESSMENT

#### Total GHG emissions

Reported carbon footprint, TeqCO<sub>2</sub>

Scopes 1 & 2

1,287

Scope 3 upstream

10,351

Estimated carbon

intensity, TeqCO<sub>2</sub>/€M Revenue

4.09

33

### GREEN TAXONOMY

Measure the proportion of "sustainable" revenue, CapEx and OpEx.

### LOW-CARBON TRAJECTORY

Measure, reduce and contribute to offsetting programs



## SOCIETAL

- ✖ Net Promoter Score > 40 in 2023
- ✖ Gold EcoVadis ranking in 2023
- ✔ 4 local programmes in female digital education by end of 2023

## ENVIRONMENTAL

- ✔ 2 Cyber Clean-Up Days by end of 2023
- ✖ Carbon neutrality by 2028

Employee CSR training programmes ✖

✔ Target achieved

✖ Work in progress

# Business Model

## Our mission

Securely move, integrate or expose the data of large enterprises.

INFRASTRUCTURE  
SOFTWARE MARKET  
TRENDS



CONVERGENCE  
OF LEGACY  
SYSTEMS  
AND NEW  
DIGITAL NEEDS

## Strengths

### EMPLOYEES

- 1,525 employees in 19 countries
- Diversity of profile, age, origin, without discrimination

### GOVERNANCE

- Solid financial capacity
- History of organic and external growth
- Independent corporate project, supported by reference shareholders
- 3-year strategy and objectives
- Shared governance between the Board of Directors and the Executive Committee
- Matrix-based management structure by region and major product line

### PRODUCTS

- Technology strategy based on a rationalized product portfolio
- Recognised technological leadership
- Continued investments
- 28 technology patents

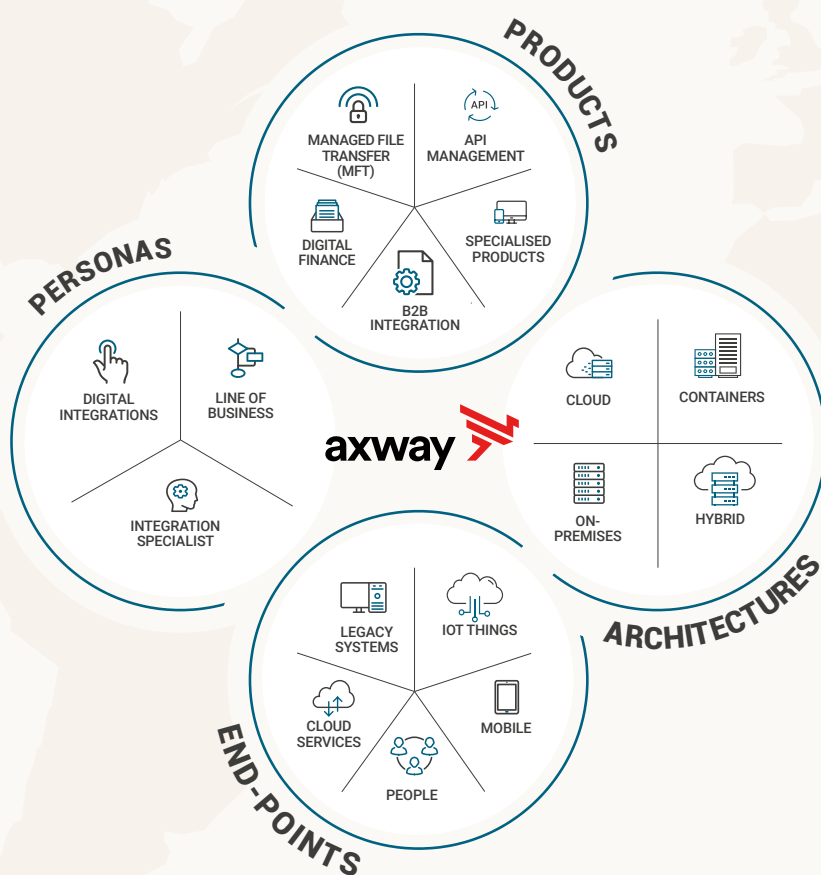
### CUSTOMERS & PARTNERS

- 11,000 customers worldwide
- Product distribution in 100 countries
- Global network of partners

### CORPORATE RESPONSIBILITY

- Key performance indicators
- Employer, Societal, Environmental Programmes
- Executive Management leadership
- CSR dedicated team

## Offers



Employees  
Customer

RAMP-UP OF  
CLOUD AND  
SAAS MODELS

CONSTANT  
INNOVATION

ZERO TRUST:  
ACCESS TO  
HYPER-SECURE  
DATA

TALENT  
WAR

SECTOR  
CONSOLIDATION

## Strategy

TECHNOLOGICAL  
EXCELLENCE  
THROUGH  
A RATIONALIZED  
PRODUCT  
PORTFOLIO

GROWTH AND  
PROFITABILITY

SOCIAL,  
SOCIETAL AND  
ENVIRONMENTAL  
COMMITMENTS

## Value creation

### EMPLOYEES

- Employee engagement score: 61%
- Recruitments: 202, with 99% permanent contracts
- Training: 20,983 hours
- Flexibility: 60% home office/40% on-site
- Management - employee dialogue sessions: 16 sessions
- Employee share ownership: 2.14% of share capital
- Feminisation: 4 programmes
- People with disabilities: new project

### CUSTOMERS

- Best in class products
- Open solutions
- Customer satisfaction (NPS): 35
- EcoVadis: Silver (61/100)

### SHAREHOLDERS

- Middennext Governance code
- Gaïa rating
- Transparency of information
- Dedicated team and website

### SUPPLIERS

- Ethical and responsible tools
- Integration of the first 100 suppliers in the carbon footprint
- Improved Responsible Purchasing Process

### PARTNERS

- Strategic and technological partners
- Partner satisfaction (NPS): 59
- Co-innovation

### CIVIL SOCIETY

- Low-carbon trajectory for scopes 1, 2 and 3
- UN Global Compact commitment
- Societal programs in favour of the digital careers
- Green taxonomy

Engagement  
Satisfaction

## Introduction

As a software publisher Axway supports companies and major organisations in their digital transformation and rolls out its Corporate Responsibility (CSR) policy through three commitments: social responsibility as an Employer, Societal responsibility through relations established with stakeholders in its ecosystem and Environmental responsibility as an economic player aware of the impact of its activities in a climate emergency context.

Axway's strategy and ambitions include several CSR indicators, which contribute to the Company's performance. In 2022, Axway achieved a number of milestones in the roll-out of its CSR approach. Through the quantitative objectives published in 2021, several programmes underpinning Axway's Employer, Societal and Environmental commitments were enriched with new indicators or objectives, while other programmes were extended to encompass new scopes.

This progress was possible thanks to strengthened CSR practices at different levels of the organisation. As part of a comprehensive operational system, a dedicated team is responsible for the roll-out and steering of programmes defined by the Chief Executive Officer and overseen by the Board Of Directors.

Measuring the environmental impact of the Company's activities was a major task in 2022. Mapping the CO<sub>2</sub> emission sources of Axway's activities enhanced the carbon assessment performed annually. Improvements were particularly achieved in measuring the scope 3 emissions of purchases of goods and services, a sector that accounts for a non-negligible portion of indirect emissions generated by tertiary sector companies. The assessment of the environmental impact is more comprehensive each year, enabling the development of an updated work base with a view to managing a gradual reduction in emissions up to 2028.

Progress was also achieved with social programmes, grouped together within the Employer commitment, based on objectives set for increasing the number of women in teams and recognising people with disabilities to better address their needs and support them. As each year, employee engagement was again assessed by an internal survey sent to all teams.

Societal commitment programmes were enhanced through partnerships with external bodies promoting diversity and greater female representation in digital professions, while customer satisfaction and transparency with stakeholders were once again core issues.

Internal communication on CSR programmes was closely monitored and stepped up during a number of Company events throughout the year, encouraging discussion between employees and Executive Management.

It is recalled that Axway's operating context, strategy, risk monitoring and corporate governance are presented in Chapters 1, 2 and 4 of the 2022 Universal Registration Document, and summarised below.

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

## Axway's sector, strategy and business model

The software solutions developed by Axway help companies make the most of their IT infrastructures by securely moving, integrating or exposing their strategic data.

In 2022, Axway attained its objective of optimising its product portfolio, while generating growth and improving profitability. The Company adjusted its organisation to include General Managers for each of the four main product lines. These new leaders are responsible for defining, producing and selling the various products and services proposed by Axway. Supported by the Research & Development, Product Management and Marketing teams, they comprise the value chain in the Company's business model.

In a competitive sector with highly innovative businesses, Axway maintains its innovation and human capital assets and its responsible values through:

- an organisation focused on satisfying customers, measured by the Net Promoter Score (NPS);
- a comprehensive portfolio of products recognised by market analysts;
- significant investment in Research & Development, sales and marketing;
- balanced governance and a shareholder structure guaranteeing an independent corporate project;
- constant dialogue between Executive Management and employees, supported by direct surveys;
- agile working methods and a harmonious and safe work environment;
- talent development, coordinated by a dedicated structure, Axway University;
- a solid financial structure;



- values shared with all the Company's stakeholders;
- CSR indicators and programmes integrated in the Company's policy and employee objectives.

These assets support Axway's ambition to become an independent, committed and responsible leader in its markets.

## Axway's main risk factors, including risks relating to corporate responsibility

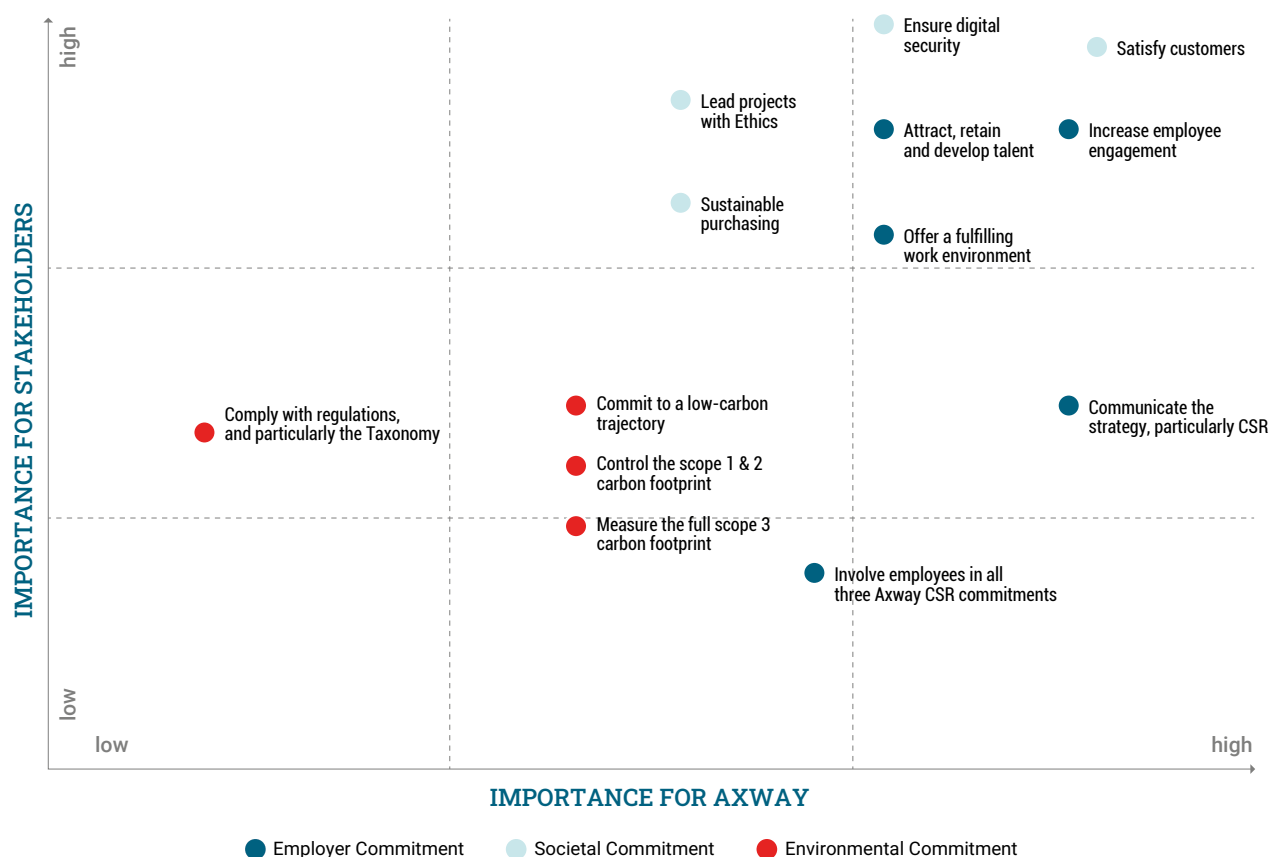
Axway's risk factors are described in Chapter 2 of the 2022 Universal registration document. The following tables summarises the four risk categories identified by the Company and sets out, where applicable, the related CSR indicators and programmes.

Risk category	Main risks	Criticality	CSR indicator
Risks relating to Axway's market	• Risks of lack of innovation and failure to anticipate market trends	• High	• NPS customer satisfaction.
	• Risks relating to the go-to-market of products and solutions	• High	
	• Risks of customer base erosion and non-renewal of Maintenance or Subscription contracts	• Medium	
Risks relating to Axway's business and organisation	• Risks relating to attracting, developing, engaging, recognising and retaining talents	• High	• Employee engagement score. • Gender diversity and Disability. • Training programmes & talent development.
	• Risks of technical defects in product development and production errors	Medium	
Security risks	• Information, software and internal application security risks	• High	• Certification and dedicated training.
Legal and compliance risks	• Intellectual property protection risks	• Medium	• Human rights. • Middlednext Code of Corporate Governance. • Contribution to carbon neutrality.
	• Regulatory compliance risks – including environmental risks	• Medium	

## Axway stakeholders

As a software publisher, Axway interacts responsibly and in accordance with business ethics rules with numerous stakeholders within its ecosystem: employees, customers, partners, suppliers, shareholders, investors and societal organisations. The materiality matrix presented below maps the main stakeholder expectations ranked by their importance for Axway.

## Materiality matrix for Axway's CSR indicators, with stakeholders and by ranking

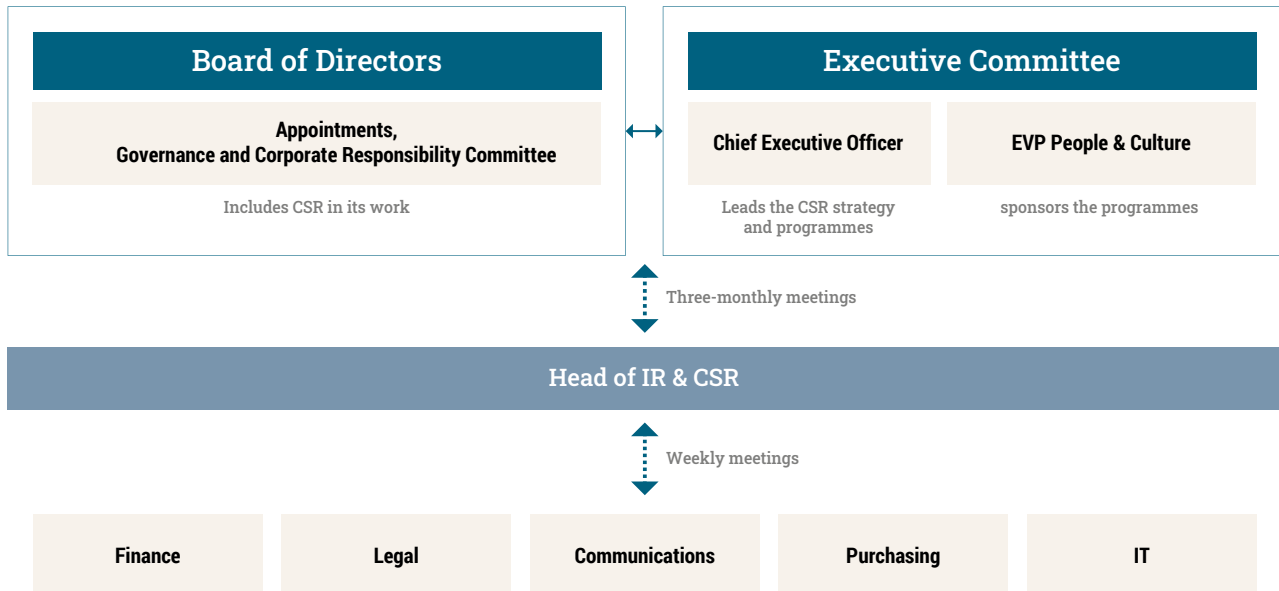


Social-Employer	Societal	Environmental
<b>Attract, retain and develop talent</b> with a diversity of gender, age and disability. Through training and innovation with customers.	<b>Satisfy customers:</b> Customer Success 360° programme and customer satisfaction survey - NPS tool. Innovation, quality of products and supports, co-design, customer experience, digital sovereignty - ISO 27001.	<b>Commit to a low carbon trajectory:</b> measure, reduce and offset the impacts of our activities on the environment.
<b>Increase employee engagement:</b> annual internal survey and monitoring of the engagement indicator.	<b>Ensure digital security:</b> security of data, activities and digital exchanges in internal applications and the cloud.	<b>Master the scope 1 and 2 carbon footprint:</b> consumption of internal and external resources – energy, paper, digital exchanges – GHG assessment.
<b>Provide a fulfilling working environment:</b> agile working methods, accessibility and efficiency of premises, internal communication, monitoring psycho-social risks.	<b>Conduct projects with ethics:</b> governance code, Ethics charter, whistle-blowing procedure, Global Compact SDG commitment.	<b>Measure the full scope 3 carbon footprint:</b> include all suppliers in the carbon measure.
<b>Communicate the corporate strategy,</b> particularly CSR.	<b>Sustainable purchasing:</b> ethical tools integrated into contracts by type of supplier or partner.	<b>Comply with regulations,</b> and particularly the European Taxonomy.
<b>Involve employees in all three Axway CSR commitments.</b>		

## Axway governance and CSR system

Axway's governance is founded on the Board of Directors and the Executive Committee and conducted in accordance with the recommendations of the Mollenex Code of Corporate Governance, to which Axway has adhered since 2013.

Corporate Social Responsibility (CSR), its objectives, programmes and progress are steered by the Chief Executive Officer during quarterly meetings and presented to the members of the Board of Directors at least twice a year within the Appointments, Governance and Corporate Responsibility Committee.



## CSR publications, tools and reference guides

### Publications

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

The **CSR Report**, an annual report extracted from the Non-Financial Performance Statement and also including the Chief Executive Officer's letter of commitment to the United Nations Global Compact.

**Ethical tools and charters**, to materialise and share commitments. Axway has implemented formalised processes, tools and documents in the following areas:

- human rights, ethics and anti-corruption: commitment to the United Nations Global Compact, Ethics charter, whistle-blowing system, training;
- customer satisfaction: customer satisfaction surveys and NPS indicator, training;
- employee engagement and well-being: annual internal survey, social performance measurement;
- digital security: charters, standards and internal and external security and cybersecurity training programmes;
- sustainable purchasing: supplier assessment through the contractual legal and ethical process and assessment of the carbon impact of the main suppliers;
- stock market: Securities Trading Code of Conduct;

- data privacy: data privacy measures, in particular in contractual procedures and on Axway websites;
- environment: annual carbon assessment;
- Corporate responsibility: materiality matrix and audit of CSR indicators;
- Governance: compliance with Mollenex Code of Corporate Governance recommendations.

### CSR indices, assessments and standards

Each year, Axway completes various CSR assessments and standards, including in 2022:

- **Gaia**, ESG assessment and stock market index;
- **EcoVadis**, CSR performance and sustainable purchasing assessment platform;
- **CDP** – Climate Disclosure Project, since 2022;
- **ISO/IEC 9001 and 27001, AICPA SOC2 standards**, quality and security audit.

### CSR reference guides

**ADEME**: methodology and guidance issued by the French Agency for ecological transition for calculating the carbon impact of activities -for more information;

**SDGs**: United Nations Sustainable Development Goals - for more information.

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



## Axway's CSR Targets

Since 2021, Axway has set CSR targets around three commitments: Employer, Societal and Environmental. The Company has set specific quantifiable objectives for each commitment, specifying the deadlines. The objectives and their respective progress are summarised below:

CSR TARGETS → 2023/ 2028	EMPLOYER	SOCIETAL	ENVIRONMENTAL
	<ul style="list-style-type: none"> <li>✗ Employee Engagement Score &gt; 70% in 2023</li> <li>✗ 33% of women in total headcount in 2023</li> <li>✗ +25% of people with disabilities in France in 2023</li> </ul>	<ul style="list-style-type: none"> <li>✗ Net Promoter Score &gt; 40 in 2023</li> <li>✗ Gold EcoVadis ranking in 2023</li> <li>✓ 4 local programmes in female digital education by end of 2023</li> </ul>	<ul style="list-style-type: none"> <li>✓ 2 Cyber Clean-Up Days by the end of 2023</li> <li>✗ Carbon neutrality by 2028</li> </ul>
	Employee CSR training programmes ✗		
	✓ Target achieved   ✗ Work in progress		

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

### 2.1 Progress with Employer targets

Targets set in 2021	2022 context and programme	2021 Baseline	2022 Score	2023 Target
Employee Engagement >70% by end-2023	Annual employee survey	66%	61%	>70%
33% of women in total workforce by end-2023	Strengthening recruitment and retention processes	30%	31%	33%
+25% of people with disabilities in the French workforce by end-2023	Strengthening recruitment and process for recognising disability status	1.72%	1.82%	+25%

## 2.2 Main Employer indicators

Scope: published data relates to Axway's entire scope, unless otherwise stated.

Workforce	2022	2021	2020
Total workforce at the year end (in FTE, incl. fixed-term contracts)	1,525	1,712	1,888
Permanent workforce at the year end (in FTE)	1,495	1,689	1,812
Non-permanent workforce at the year end (in FTE, fixed-term contracts, temporary staff, apprentices, etc.)	30	23	n/a
Average workforce (in FTE, incl. fixed-term contracts, temporary staff, etc.)	1,618	1,799	1,890
Payroll (in millions of euros – incl. social security contributions)	197	186	197

Workforce by geographical area	2022	2021	2020
Americas	25%	25%	26%
France	28%	27%	26%
Rest of Europe	42%	44%	45%
Asia/Pacific	5%	4%	4%

Workforce by area of expertise	2022	2021	2020
Customer Success Organisation	50%	44%	42%
<i>o/w Sales</i>	31%	15%	13%
Research & Development	32%	42%	45%
Other	18%	14%	13%

Number of employees by age range*	2022	2021	2020
Average age	43	42	41
Under 30	11%	13%	n/a
30 to 44 years	47%	51%	n/a
45 to 54 years	24%	23%	n/a
55 years and over	18%	13%	n/a

\* Axway changed the age ranges in 2021.

Gender diversity	2022	2021	2020
Women	31%	30%	29%
Men	69%	70%	71%

Employees with disabilities	2022	2021	2020
Number of employees recognised with disabilities	8	8	n/a
Recognition in progress	1	n/a	n/a

Type of employment contract	2022	2021	2020
Fixed-term employment contract	1%	2%	4%
Permanent employment contract	99%	98%	96%

## Corporate responsibility Non-financial performance statement AFR/NFPS

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

<b>Employee engagement</b>	<b>2022</b>	<b>2021</b>	<b>2020</b>
Internal survey participation rate	72%	79%	86%
Employee engagement score	61%	66%	69%
<b>Employee seniority</b>	<b>2022</b>	<b>2021</b>	<b>2020</b>
Average seniority in years	9	8	7
<b>Internal transfers</b>	<b>2022</b>	<b>2021</b>	<b>2020</b>
Number of internal transfers	82	181	371
<b>Employee training</b>	<b>2022</b>	<b>2021</b>	<b>2020</b>
Total number of training hours	20,983	29,915	24,176
Average number of training days per employee	1.97	1.86	1.50
<b>Recruitment and Attrition</b>	<b>2022</b>	<b>2021</b>	<b>2020</b>
Number of recruitments	202	204	247
Attrition rate	25%	21%	13%
Net change in workforce at constant scope	-10.9%	-9.3%	n/a

## 2.3 Employer programmes in 2022

### 2.3.1 Promote diversity and ensure non-discrimination of talent

The software publishing industry, by its global dimension and international training standards, recruits people from all continents and multiple cultures based solely on their expertise. The digital industry attracts talent from a wide range of fields: scientific, artistic, literary or self-taught people trained in digital communities.

While the digital sector is pushing back sector barriers and revolutionising business practices, business models and management through innovation, it is facing a talent shortage. Recruitment is a constant challenge for market players.

At the same time, it is proving difficult to improve the gender balance and the number of women in digital training courses remains low throughout the world. Similarly, access to employment for people with disabilities remains limited and a range of insertion programmes is developing slowly and in different ways across countries.

Axway is committed to upholding ethical and social values by supporting diversity among its employees and stakeholders. The Company has set targets for 2023 supported by programmes aiming to increase the number of women in teams and promote the recruitment of people with disabilities.

#### Diversity and non-discrimination

##### Gender equality

**Target: 33% of women in total workforce by end-2023**

##### General



##### policy



Axway adheres to strict ethical rules on non-discrimination and implements programmes to reduce inequality in the 19 countries where it operates. It complies with the laws of each country where it operates and is committed to promoting diversity and non-discrimination, particularly among its employees.

Training and internal information campaigns increase awareness of diversity, anti-harassment and ethics best practices in the conduct of business.

##### Programmes in 2022

Axway, already positioned above the industry average, has set the target of increasing the percentage of women in its workforce from 30% in 2021 to 33% in 2023.

In France, for a number of years, Axway has published the equality index introduced by the Ministry for Labour - *more information* -. In the United States, Axway complies with the Equal Employment Opportunity programme - *more information* -.

##### In 2022, work focused on:

- producing a quantitative inventory and analysing the number of women in the workforce by country, business, qualification, hierarchical positioning and individual performance level;
- identifying actions and lines of communication that can promote the recruitment and retention of female employees;
- preparing an internal mentoring pilot project for female employees to be implemented in 2023;
- working with associations and organisations promoting digital careers to women (for more information see the Societal section of this document);
- sharing programmes during internal communication events by Executive Management.

% of women in the workforce	2022	2021	2020
Total workforce	31%	30%	29%
Board of Directors	43%	43%	43%
Executive Committee	29%	25%	22%
Managers (at least one person to manage)	26%	15%*	28%
% of women recruited	27%	33%	28%

\* 2021 data was wrongly calculated based on the total workforce.



## People with disabilities

Target +25% in France

### General policy



Axway has been committed to supporting the employment of people with disabilities in France for several years and is seeking to expand its practices in several other countries where the Company operates.

The Company has set the target of increasing the percentage of employees with disabilities by 25% in France between 2021 and end-2023.

Two focus areas should enable this target to be achieved:

- facilitating the recruitment of people with disabilities;
- assisting with the process of recognising the disability status of employees already present in the Company.

By dedicating resources to this work, Axway strengthens its inclusive policy and promotes equal opportunity among its current and potential future employees.

### Handicap 2021-2023 agreement and scheme:

The Handicap scheme at Axway in France is defined in the Handicap 2021-2023 agreement encompassing all Sopra Steria group companies operating in France to promote the integration of people recognised as disabled workers. The scheme includes:

- a disability officer and a Human Resources department manager, who are responsible for supporting employees who are personally or indirectly dealing with disability;
- personalised assistance for employees with disabilities: specific arrangements - ergonomics, equipment, organisation of working time, authorised absences for medical appointments - and assistance with all the administrative procedures necessary to have their status as disabled workers recognised;
- the status of "caregiver", introduced for employees assisting a close friend or relative with disabilities. This provides access to financial support, flexible working hours, authorised absences and adjustments to their working conditions.

### Programmes in 2022

### Strengthen the programme

#### In 2022, Axway strengthened its programme to highlight the skills of people with disabilities.

In France, Axway took part in several initiatives:

- HanDigital Week 2022 events to reduce prejudice and highlight people's expertise rather than their disability;
- the live show "Laugh at disability? Lilia Benchabane dares", followed by discussions with the comic;
- the Disability Café to raise awareness of disability and communicate on the Company's disability policy,
- a DuoDay, conducted for several years now, in France and other European countries (Belgium, Finland, Portugal, Germany, Luxembourg), which pairs a person with disabilities and a volunteer professional in companies, local authorities and associations. In 2022, Axway welcomed a person with a disability as part of DuoDay.

**In five other countries where Axway operates:** the USA, Germany, Romania, Bulgari and Ireland, several activities and actions were undertaken:

- analysis of local regulations in each country on recognising disability;
- analysis of internal processes to identify employees with disabilities;
- raising the awareness of local HR managers;
- inventory of local initiatives for people with disabilities in external local organisations;
- analysis of communication and recruitment materials on disability issues.

In addition, consideration is being given to Axway seeking a label recognising its status as a disability-friendly company.

### Disability training and tools

#### Training sessions:

Six training modules are offered to employees and recommended in the integration curriculum for new hires. They are available in English and/or French and cover topics encompassing discovering the key disability issues, taking disability into account in the company, working daily with an employee with disabilities, digital accessibility.

#### Communicating on disability and recruitment:

- "Disability-friendly company" indicated in all job offers;
- job offers communicated on recruitment platforms promoting the recruitment of people with disabilities;
- disability and recruitment intranet space.

## People with disabilities key figures (France &amp; USA)

	2022	2021	2020
% of people recognised with disabilities in the workforce in France	1.82%	1.72%	n/a
Number of employees recognised with disabilities	8	8	n/a
Number of people in the process of being recognised as a disabled worker in France	1	1	n/a
Number of training modules or disability awareness sessions	6	n/a	n/a
Number of disability awareness-raising sessions held in the year	2	2	n/a
Number of additional days leave granted to employees with caregiver status	6	6	n/a
Number of employees with caregiver status	10	8	7

### 2.3.2 Recruit highly sought-after talent

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

In 2022, Axway continued to be attractive, with 202 new recruits – excluding acquisitions – across all positions and in all countries where Axway has employees. In addition, the June 2022 acquisition of DXchange.io, a company based in Hyderabad, India, led to the integration of 20 employees.

Recruitment	Actions in 2022
<b>General policy</b>	<p>Axway's recruitment policy is conducted in accordance with the Employer commitment of non-discrimination and promoting diversity as described at the beginning of this Chapter.</p> <p>For several years, Axway has been developing a programme to attract young talent through numerous initiatives, including:</p> <p>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 by offering numerous internships each year. Axway also uses specialised recruitment platforms, such as Welcome to the Jungle,</p> <p>Internships, apprenticeships, work-study contacts: Each year, Axway offers internships, apprenticeships and work-study contacts in several countries, allowing young people to complete their learning during or after their studies. Many of these young people receive job offers at the end of this experience,</p> <p>Three years/Three professions programme: In 2022, Axway continued its "3 years/3 professions" programme in France 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 2022, one student from this programme was hired by Axway at the end of their apprenticeship.</p> <p><b>Recruiting under permanent employment contracts</b></p> <p>Axway recruits almost exclusively on permanent contracts, except for temporary replacements. The share of permanent employment contracts increased again in 2022 and now represents 99% of contracts, despite the uncertain economic context.</p>
<b>Co-opting candidates</b>	<p>To promote co-optation and make its employees its ambassadors, the Company continued its programme of encouraging employees to suggest members of their networks join Axway.</p> <p>28 employees were co-opted.</p>
<b>Talent Acquisition</b>	<p>Thanks to its Talent Acquisition team located in the various countries where it operates, Axway recruited a variety of profiles, mainly engineers and sales staff.</p>
<b>Partnerships</b>	<p>The partnerships entered into with the specialised platforms help strengthen Axway's employer brand and visibility as an employer of choice.</p>
<b>Young talent and experienced employees</b>	<p>Given the nature of Axway's business, almost all young hires are from higher education institutions. When hiring older employees, professional experience and expertise are the key recruitment criteria.</p>

Recruitment by geographical area	2022	2021	2020
Total number of people recruited	202	204	247
Americas	26%	27%	27%
France	25%	22%	18%
Rest of Europe	39%	47%	50%
Asia/Pacific	10%	4%	5%

Recruitment by age range	2022	2021*	2020
Total number of people recruited	202	204	247
Average recruitment age	35	37	36
Under 30	33%	26%	n/a
30 to 44 years	48%	53%	n/a
45 to 54 years	12%	15%	n/a
Over 55	7%	6 %	n/a

\* Axway changed the age ranges in 2021.

Interns and apprentices	2022	2021	2020
Number of interns in the workforce	9	2	6
Number of work-study students / apprentices	17	9	22
Hires following an internship or work-study contract	4	4	2

### 2.3.3 Incorporate employee expectations

Since 2016, Axway has regularly organised “Axway Voice Survey” engagement surveys among its employees. The objective is to measure employee engagement using the Employee Engagement Score and to identify global or local areas for improvement so as to roll-out related action plans.

In addition to the annual survey, exchanges are organised throughout the year:

- working groups by team, led by the employees themselves,
- frequent discussion sessions with Executive Management, open to all employees,
- internal roadshows, by geographical area, led by members of Executive Management.

These exchanges continued in 2022 and again allowed discussions on Axway's strategy and innovations. They also offered an opportunity to inform employees about the systems deployed. The Chief Executive Officer organised close to 20 discussion sessions in the year, known as “CEO Office Hours”, with each session bringing together an average of 300 employees. Discussions focused in particular on Axway's strategy, working methods, the use of premises, CSR programmes and the Company's carbon impact.

Executive Management also communicates quarterly with all employees during a global virtual meeting, on the presentation to the market of the Company's results.

#### Employee engagement indicator

The level of employee engagement measured by the Employee Engagement Score is one of the qualitative criteria determining the Chief Executive Officer's variable compensation and was included for the first time in 2022 variable remuneration criterion for all Company managers.

#### Engagement survey methodology

Under the survey methodology, a minimum employee participation rate of 30% is needed for the survey to be representative. 65% is considered a good participation rate.

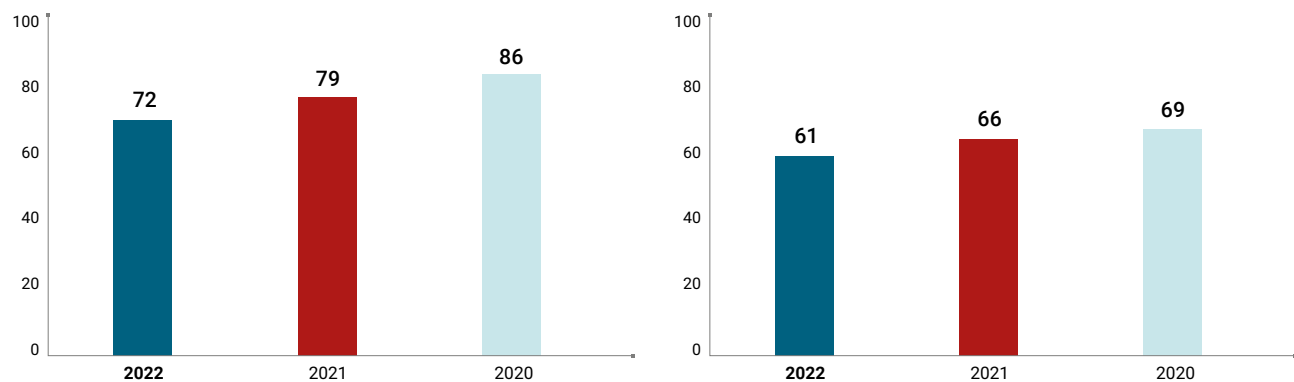
It is recognised that for a company to achieve its goals and create a virtuous circle with employees, it needs an employee engagement rate of 60% or above. Reaching this score means that the majority of employees are positively engaged with the Company's objectives.

After five editions, the questionnaire was revised and some questions were clarified to take account of changes in the Company's organisation and strategy. The survey's sixth edition took place from 1 to 13 February 2023.

**Sixth edition of the Axway Voice Survey**

72% of employees participated in the survey, which showed an engagement score of 61%.

In a context of the reorganisation and greater concentration of our product portfolio and despite a slight fall, the employee engagement rate reflects employee commitment to Axway and their conviction that the Company has the necessary resources to continue implementing its strategy.

**Internal survey participation rate (%)****Employee engagement rate (%)**

The Employee Engagement survey is an essential measurement tool for managing the Company and offers employees another opportunity to make their voices heard.

**2.3.4 Develop the talent and experience of each employee**

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 with societal organisations where digital transformation is rapidly being deployed.

**Skills development****General policy**

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

**Actions in 2022****Axway University**

The training offering comprises both face-to-face and e-learning formats. Axway University uses a Learning Management System (LMS) training platform accessible to customers, partners and employees. Employees can also access training courses free of charge and from anywhere in the world via "Jive", Axway's internal social network.

A total of 20,983 hours of training were provided in 2022 to 1,931 employees <sup>(1)</sup>, i.e. an average of 1.97 days per trained employee, up significantly year-on-year.

Training sessions	2022	2021	2020
Total number of training hours	20,983	29,915	24,176
% of e-learning	62%	77%	93%
Number of employees trained <sup>(1)</sup>	1,931	2,297	2,292
Average number of training days per employee	1.97	1.86	1.50
Number of interns trained <sup>(2)</sup>	13,556	38,258	20,142
Training budget (in euros)	750,000	750,000	n/a
Dedicated training intranet space	yes	yes	yes
Training or awareness-raising on Environment issues	1 cyber clean-up	n/a	n/a
Anti-harassment training	461	n/a	n/a
Training session on equality, parity and gender stereotypes	8	n/a	n/a
Health and safety training/programmes	58	n/a	n/a
Employee initiatives supported by Axway promoting sport activities	yes	yes	yes
Business ethics training – number of employees trained	325	n/a	n/a
Anti-corruption training – mandatory for all employees	yes	yes	yes
IT security/cybersecurity training - number of employees trained	1,530	1,678	1,472
Anti-corruption document shared with employees	yes	yes	yes
<b>Customer satisfaction training</b>			
Customer satisfaction training (number of participants)	50	n/a	n/a

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

(2) Refers to the concept of "intern", an employee who has followed several training courses in the year is therefore included several times.

## Develop to continue learning

### Mobility

#### General policy

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

All internal mobility offers (excluding jobs that are exceptionally confidential) can be viewed by all employees. By going to the internal network's "Make your Move" career page, employees can access the application portal. In addition, every Friday, the internal newsletter publishes three to five offers, maximising their visibility.

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

#### Actions in 2022

In 2022, opportunities for new positions opened in the new management structure for Axway's strategic product lines.

Overall, 82 employees moved internally in 2022, either via a promotion or a change in position.

## Access to progress

In 2022, Axway continued the new global approach of continuous performance management launched in 2019 and based on constant dialogue between employees and managers.

Talent appraisal	Actions in 2022
<b>Talent Review</b>	For the fourth year in a row, Axway set up and carried out a global talent review covering the entire 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.
<b>Professional interview</b>	Since 2014 and in accordance with French law, Axway also conducts a professional interview every two years in France. 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.
<b>Develop one's managerial expertise</b>	<p>In 2022, 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.</p> <p>In order to deploy the continuous performance management approach to all employees, in 2020 the Company designed training modules to introduce teams to these best management practices.</p> <p>New managers are therefore also invited to follow these modules.</p> <p>Supplementing this approach, the Conversation/Feedback/Recognition (CFR) system encourages ongoing dialogue and regular feedback between managers and employees throughout the year.</p>
<b>Grow thanks to the Axway community</b>	<p>Axway's teams in 19 countries can share Company events via the "Jive" internal social network, internal newsletters and on-site events:</p> <ul style="list-style-type: none"> <li>• <b>the "Jive" internal social network:</b> 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 information: internal resources, employee information, tools, customer references and product catalogues. It was particularly valuable during the pandemic.</li> <li>• <b>The Griffin Digest:</b> this weekly internal electronic newsletter distributed by the Internal Communications 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.</li> </ul>
<b>Keep informed of the strategy by Executive Management</b>	<ul style="list-style-type: none"> <li>• <b>CEO Office Hours:</b> launched in 2022, these meetings, organised in digital format, can be freely accessed and allow questions to be asked directly to the Chief Executive Officer and the members of the Executive Committee who are present. The topics focus on Axway's strategy, operational issues, and Company news. Around twenty meetings were held in 2022, each of which brought together nearly 300 people.</li> <li>• <b>Communications from Executive Management</b> and various members of the Executive Committee continued in 2022, at a weekly, monthly or quarterly pace, depending on current events. In addition to economic performance and developments in offerings, new themes were discussed this year, primarily engaging dialogue with employees on CSR issues, the carbon impact and programmes on increasing the number of women and people with disabilities in the workforce.</li> <li>• <b>Executive Roadshows:</b> in-person and virtual meetings organised by Executive Management members with employees by country. The acquisition of DXchange in June 2022 was a special event, to welcome the 20 employees of the company located in Hyderabad, India.</li> </ul>

Talent reviews and career interviews	2022	2021	2020
Number of Talent Reviews in the year	1,615	1,703	1,812
Number of Talent Reviews conducted as a % of the total workforce	96%	94%	96%
Professional interviews (conducted two-yearly)	yes	yes	n/a
Number of employees who benefited from managerial skills training during the year	285	368	n/a

### 2.3.5 Recognise and promote talent

Axway's objective is to write a shared history with its employees and build team loyalty around a long-term project. This shared history is evidenced by the average seniority at Axway (9 years), in a particularly volatile and competitive employment market.

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.

#### Recognise talent Actions in 2022

<b>General policy</b>	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.
<b>Employee shareholder</b>	To involve employees in the Company's transformation project, Axway has performed two free share grant plans covering all employees. 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 at that date, subject to the condition that they remain employed by Axway for a period of three years, i.e. until 2022. As a result, Axway shares vested to 1,270 employees this year. Overall, Axway employees hold 2.14% of the Axway share capital vs. 0.96% in 2021 as indicated in Chapter 7 of the 2022 Universal registration document.
<b>Attractive financial conditions</b>	In 2022, as in previous years, Axway paid salary increases in accordance with an individualisation policy, applied in a fair and identical manner in all countries where Axway operates.
<b>Attractive employment conditions</b>	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.
<b>Include CSR indicators in compensation</b>	Some CSR indicators, relating in particular to employee and customer satisfaction, as well as Axway's environmental policy, are gradually being introduced into the compensation policy.

Benefits specific to Axway (non-exhaustive)	2022	2021	2020
Average seniority of employees (number of years)	9	8	7
Number of employees rewarded for their seniority	111	541	n/a
% share capital held by employees at 31 December	2.14%	0.96%	0.84%

Compensation components specific to Axway	2022	2021	2020
Existence of variable compensation tied to Company performance, depending on the position held	yes	yes	yes
Inclusion of a CSR indicator in the Chief Executive Officer's variable compensation	yes	yes	yes
% of employees receiving variable compensation tied to customer satisfaction – NPS	62.0%	61.7%	60.0%
% of employees receiving variable compensation tied to employee engagement – Top management	2.1%	n/a	n/a
% of employees receiving variable compensation tied to Axway's carbon footprint reduction programme	Chief Executive Officer	n/a	n/a
% of employees receiving profit-sharing – France	100%	100%	100%



### 2.3.6 Quality of work life

#### Agile working methods: Future of Work

Even before the international pandemic, working from home was widespread at Axway, particularly in the United States. In 2019, 37% of Axway employees based in the United States were already working from home.

In the last two years, Axway has been experimenting a new agile 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.

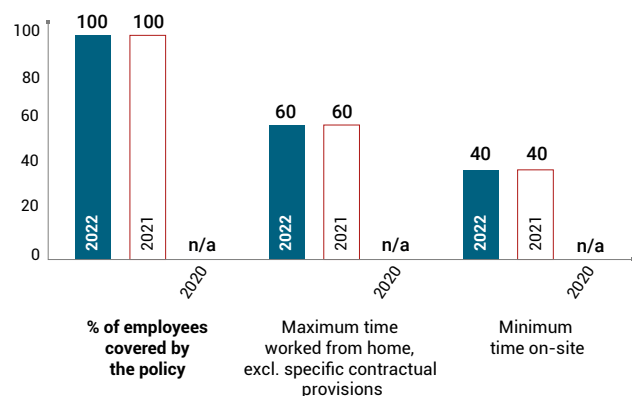
Drafted with all employees through two internal surveys, local working groups and employee representatives in companies where they exist, the Future of Work policy enables employees to work 60% of time remotely and 40% of time on-site, in an Axway office.

This flexibility is mainly founded on:

- constant coordination between employees and managers to define together the days employees work from home in line with team activities;
- freedom to work remotely from a private location several days in a row;
- collaborative digital tools that enable continuous team dialogue and work in identical conditions on site and remotely.

This working-time policy was recorded in a professional agreement in France in October 2021 and in Germany in January 2022.

A Flex Office policy was rolled-out in Romania in 2022, to better optimise the premises in conjunction with the new agile and sustainable working model.



Agile working methods	2022	2021	2020
% of employees who have received training in good home working practices	100%	100%	100%
% of employees equipped to work effectively remotely	100%	100%	100%

#### Working time

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 some countries, Axway is affiliated to a collective agreement. This is the case in France, where Axway Software complies with the national collective agreement for technical design offices, consulting engineering firms and consulting firms – NUMEUM.

#### Part-time work

In 2022, 2.42% of Axway employees worked part-time, mostly within the scope of parental leave.

Part-time contracts	2022	2021	2020
Total % of employees working part-time	2.42%	2.45%	1.80%

#### Additional leave

At Axway, additional leave is granted based on several criteria: seniority, age, family situation or personal events and in accordance with varying practices depending on the country where Axway is operating.

This initiative helps improve each employee's work-life balance according to their situation. For example, this represents on average five days per employee in France.

## Health and safety

Axway is a global company with employees in 19 countries and complies with local and international health and safety regulations. It implements procedures that comply with local and international regulations. Details of these local procedures are generally recorded in an Employee Handbook given to employees and available on Jive, the internal social network.

Health and safety policy summarised by indicator	2022	2021	2020
Health and Safety Committee – France	yes	yes	yes
Health and Safety Procedures (global scope)	yes	yes	yes
Installation and equipment for employees (global scope)	yes	yes	yes
Physical and psycho-social risks linked to working from home taken into account (global scope)	yes	yes	yes
Health check, depending on the country and the services included in healthcare contracts	yes	yes	yes
Health care coverage, depending on the country and the services included in the healthcare contracts	yes	yes	yes
Health and Security Intranet space (global scope)	yes	yes	yes
Family caregivers – scheme (France)	yes	yes	yes
Equipment safety audit (France)	yes	yes	yes
Actions to promote physical and sporting activities (global scope)	yes	yes	yes
Information on Future of work flexibility scheme (global scope)	yes	yes	yes

## Health and safety information

Consolidation scope and indicators: the safety indicators concern all Axway sites and 100% of employees. 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. 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 approach conducted in close conjunction with occupational health doctors, site managers and the Health, Safety and Working Conditions Committee – CHSCT (where one exists).

### Maintain low absenteeism

Absenteeism remains very low at Axway. It is mainly linked to family events or brief illnesses.

No collective agreements were signed on health and safety issues.

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

Psychosocial risk assessment: A steering committee comprised of members from Human Resources and CHSCT representatives was assembled in 2015 to assess psychosocial risks within Axway France. It regularly continues this work, monitoring the situation. Following the assessment, the Single Document was updated to include risks relating to the health crisis.

Absences	2022	2021	2020
Absenteeism rate	2.54%	2.08%	n/a
Sickness	0.97%	0.93%	0.96%
Workplace accidents/occupational illness	0.01%	0.01%	0.01%
Maternity-Paternity-Adoption	1.35%	1.02%	1.00%
Family events	0.17%	0.13%	0.07%
Individual training account – CIF (France)	0.00%	0.00%	0.02%

### Encourage a healthy and balanced lifestyle in suitable and welcoming premises

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

### Welcoming premises for a harmonious working environment

Changes in working practices, the highly developed use of digital conferencing tools and the flexibility of working from home or at the office have changed the use of Company premises.

These changes have led Axway to reconsider the layout of its premises.

A balance must be found to take account of new uses. Several subjects were analysed in 2022 and this will continue in 2023:

- rationalise the surface area of premises according to their occupancy rate;

- rethink the workplace layout – offices and workspaces – to promote quality of life at work while guaranteeing communication between employees and the experience of teams at work;
- keep common areas to enable get-togethers between teams.

The study was launched in 2022 and will continue in 2023. The Bucharest office was the first to be renovated with a “Flex office” concept, based on the presence and needs of employees.

Spaces dedicated to sporting and cultural activities are still available in most Axway premises and are used by employees individually or in spontaneously formed groups of colleagues.

### Social Dialogue

Axway monitors regulations and laws in the various countries where it operates. Only two countries have employee representation arrangements: France and Germany according to the following systems:

Structure / Scope	Country	Collective agreement	% of employees
Axway Software: Social and Economic Committee since 4 October 2019, elected for four years. Three trade unions (CGT, CFDT and Traid-Union) are represented on the Committee.	France	<ul style="list-style-type: none"> <li>• Amendment to the 2021-2023 profit-sharing agreement;</li> <li>• Future of Work home office agreement;</li> <li>• Agreement on home office arrangements</li> </ul>	28.00%
Axway GmbH: three Plant Committees and a Central Works Council.	Germany	<ul style="list-style-type: none"> <li>• GBV, Bonus plan</li> <li>• GBV, Commission plan</li> <li>• GBV, Remote Work Agreement</li> <li>• GBV, Secret Server</li> <li>• Local Works Council Agreements – 2021 (three locations):</li> <li>• BV, Compensation – Distributing Policy</li> <li>• BV, On Call Duty</li> </ul>	4.32%
<b>Collective bargaining agreement</b>			
Axway Software	- France		28.00%
Axway Software do Brasil	- Brazil		1.70%
Axway GmbH	- Germany		4.32%
Axway Belgium sa	- Belgium		0.91%

### Human Resource external service providers

The ethics and human rights policy is presented for signature to external service providers and particularly Human Resources service providers

## 2.4 2023 Employer ambitions

Axway constantly implements an improvement process to develop its employer responsibility in line with its commitments and its strategy.

For 2023, Axway's employer engagement targets remain unchanged:

### EMPLOYER

- ✖ ■ Employee Engagement Score > 70% in 2023
- ✖ ■ 33% of women in total headcount in 2023
- ✖ ■ +25% of people with disabilities in France in 2023

### 3. Societal Commitment: have a positive impact on our stakeholders as a leading software publisher

Axway's CSR materiality matrix, updated every year based on surveys conducted with stakeholders, makes it possible to build programmes and deploy responsible and sustainable practices to meet the expectations of the various parties in the Company's ecosystem. Societal programmes conducted in 2022 focused in priority on customer satisfaction and the

deployment of Axway's CSR commitments to its stakeholders and particularly its suppliers. Axway also developed its programmes promoting access to digital training and careers, through educational and social projects in line with the Employer targets described above.

#### 3.1 Progress with Societal targets

Targets set in 2021	2022 context and programme	2021 Baseline	2022 Score	2023 Target
Net Promoter Score above 40 by end-2023	Continuous monitoring of customer NPS.	29	35	>40
EcoVadis Gold label by end-2023	Annual assessment by EcoVadis.	61/100	61/100	72/100
Four female digital education programmes by end-2023	Revival and activation of programmes in different countries.	Three programmes to reactivate.	Six active programmes.	Target attained and continuation of programmes.

#### 3.2 Programmes in 2022

##### 3.2.1 Customers: further increase satisfaction

Alongside employee engagement, customer satisfaction is Axway's top priority. This satisfaction not only reflects the performance of Axway's software offerings, but also creates a virtuous value chain through the upskilling of teams, innovation, more tailored services or better strategic trade-offs.

##### Customer satisfaction



2023 Target: NPS >40

##### General policy and actions in 2022

<b>Customer Success approach</b>	<p>The Customer Success structure is central to Axway's business model. It accounted for 31% of the Company's workforce in 2022. Its goal is to dialogue constantly with customers to propose the most tailored and scalable solutions and services in line with their expectations.</p> <p>This department is headed by the Chief Customer Officer, a member of the Axway Executive Committee. Metrics are presented each year to the Board of Directors and the Appointments, Governance and Corporate Responsibility Committee, as well as to employees during internal sessions.</p>
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## Customer satisfaction



2023 Target: NPS &gt;40

**Customer satisfaction indicator**

At Axway, customer satisfaction is measured using the Net Promoter Score (NPS). This indicator is incorporated into Axway's risk management and is used as a performance indicator for the variable compensation of some employees and the Chief Executive Officer.

NPS classifies customer satisfaction in three categories: Detractors, Passives and Promoters. It is based on an iterative process that includes a survey, feedback to customers and constant dialogue with customers throughout the year. It also uses customer management tools such as customer 360° dashboards and customer success plans to provide tracking reports, enrich marketing databases, and launch campaigns, meetings, and training.

Customer expectations expressed through these mechanisms are used to guide Axway software design and research and development.

The main expectations expressed by customers are:

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

**Customer dialogue**

Dialogue with Axway customers is also organised around events alternating face-to-face meetings and remote conferences.

In 2022, several major events brought together a very large number of customers:

- 53 Customer Engagement events;
- 11 Customer Advisory Boards (CABs);
- 42 User Groups, including 10 face-to-face events.

Involving 1,004 customers representing 401 companies:

- occasional surveys were used to assess customer well-being in business relationships with Axway;
- the on-line Axway Customer Community was expanded, with over 4,600 participants by the end of 2022;
- a "virtual contact" training course was launched to share good practices in video conferencing, including with customers.

In addition, the "Idea" portal dedicated to exchanging best practices with customers, received 677 new product ideas. In polls, 5,155 votes were cast to select the best ideas proposed.

**Training based on customer expectations**

The expectations identified in customer surveys are used to build training programmes for both Axway teams and customers. These are described in the Training section of this Chapter.

Customer programmes	2022	2021	2020
Customer satisfaction indicator at 31 December 2022	35	29	25
Permanent customer survey and monitoring data in a 360° Dashboard survey	yes	yes	yes
CSR question in the customer satisfaction survey	yes security	yes security	n/a

### 3.2.2 Share Axway's practices and values with all stakeholders

Target: Silver to Gold in 2023

#### Sharing Axway's CSR performance with its stakeholders



#### EcoVadis label

Each year, Axway assesses its CSR performance through the EcoVadis rating, which measures the Company's CSR policy, actions, results and objectives with regard to governance, social, societal, environmental and ethical issues and sustainable purchasing processes.

The EcoVadis platform also allows Axway to share its CSR profile with current and prospective customers and suppliers.

In 2022, Axway retained its Silver rating thanks to a score of 61/100.

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

#### Calls for tenders and CSR performance

Axway's pre-sales teams are receiving an increasing number of customer questionnaires relating to Axway's CSR commitments, metrics and targets. The CSR profile and the scores obtained in the indexes are therefore shared in the tendering procedures.

Sharing Axway's CSR performance with customers	2022	2021	2020
EcoVadis assessment overall score out of 100	61	61	60
Customer training	yes	yes	yes
CSR questionnaires received from customers in 2022 by EcoVadis	10	n/a	n/a

### 3.2.3 Societal organisations: have a positive impact in our ecosystem

Axway includes sharing expertise in its societal commitment to promote digital careers to societal organisations and related communities.

In 2022, societal initiatives supported Axway's employer commitments:

- increase the number of women in digital careers and training;
- integrate people with disabilities.

## Sharing digital skills

## 2023 Targets: continue four programmes

## Actions in 2022

**Increase the number of women in digital careers and training**

Four partnerships were initiated in 2022, with the participation of Axway employees, to promote digital careers and training to women and young girls in schools and universities promoting diversity of profiles. In particular, these partnerships make it possible to welcome interns and work-study students in the Company.

In France, with Ada Tech School, a coding school based in Paris and Nantes that offers a curriculum adopting an alternative approach to teaching and no entry qualification requirements, including for people seeking to retrain -*more information*-.

In Ireland, with Scoil Chaitriona Cailini, a school for young girls participating in the Irish inclusive education programme -*more information*-.

In the USA, through two programmes:

- CREST (Center for Research, Engineering, Science, and Technology), a training programme offered by Paradise Valley High School to its students - *more information* -;
- The WISE programme (Women in Science and Engineering) at Arizona State University for the development of leadership and technological careers for women - *more information*.

Several other initiatives already supported by Axway have been strengthened:

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 careers are accessible to women through testimonials and mentoring by women that have chosen these professions. Axway sponsors participated in two events in 2022 - *more information* -.

Professional Women's Network, a women's professional network that promotes women engineers who communicate their passion and wish to inspire vocations. The partnership between PWN and Axway enabled 11 female employees from Europe to participate in discussions organised by the network and thus raise awareness of Axway. Five Axway employees in France have benefited from PWN's mentoring programme since October 2022 -*more information*-.

**Promote the insertion of people with disabilities recruited in digital careers**

In France Axway is a partner of Club Handicap & Entreprises 92. This club brings together business representatives and people with disabilities to help them find a job.

In 2022, workshops were held to address various employment-related topics for people with disabilities. These included help with returning to work after a long absence due to illness, recourse to disabled self-employed workers, vocational guidance and rehabilitation services, finding suitable businesses for temporary workers, DYS disorders, digital inclusion, presentation of the social fragility barometer, challenges and good practices for club companies, as well as prevention and occupational health -*more information*-.

**Innovate and share expertise within digital professional bodies**

Axway is a member of professional organisations and participates in digital expertise exchange projects. These organisations and projects include:

- Numeum: Axway contributes in particular to digital sector surveys and workshops;
- Talents du Numérique (Digital Talent): Axway welcomes students at its premises who are considering continuing their studies in the digital field and participates in workshops to promote and develop digital innovation for all and the more vulnerable groups -*more information*-;
- France API : Axway jointly organised the first edition of the API trade fair in France -*more information*-;
- Collectif API Thinking: a French API Think Tank of APIs bringing together 79 companies to create a discussion forum and a technological vision -*more information*-;
- Sopra Next's Ecosystems Experience days: a collaborative experience around the APIs of tomorrow, opening up new perspectives for digital careers;
- Apidays: global API event which celebrated its tenth anniversary in 2022 and with which Axway has partnered since its creation - *more information*-.



### 3.2.4 Shareholders & investors: information availability and 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.

Axway is listed in compartment B of the Euronext Paris market and complies with the Middenext Code of Corporate Governance. Through these organisations, the Company participates in work by the market to develop best practices and complies with a particularly high level of transparency for the financial community.

The Company makes a dedicated website available to shareholders and investors, that contains all publications and information that could be useful to them. Shareholders and investors are invited to subscribe to Axway's e-mailing list to receive the latest Company news directly.

Shareholders and investors have access to a range of resources including:

- key figures and a description of the Company's activities, governance and capital;
- press releases and Company financial and non-financial presentations;
- Axway's financial communication schedule;
- a space dedicated to General Meetings;
- all publications relating to regulated information.

A dedicated team is tasked with answering their requests and questions throughout the year.

#### Gaia non-financial rating

As each year, Axway's non-financial performance is assessed by Ethifinance as part of the Gaia Research rating review.

Gaia Rating Index	2022	2021	2020
Total rating for 2021, 2020, 2019 campaigns published the following year.	67	63	63

\* Assessment based on prior year data and 2021 updated by Gaia.

### 3.2.5 Partners: integrate sustainable indicators

Axway applies ethical, anti-corruption and data privacy rules to the various partners with which it works. These partnerships are formally documented at local or global level, according to the different types of agreement:

- global technology alliances to strengthen Axway offerings with vendors such as Amazon Web Services and Microsoft Azure;
- integrator partners to implement Axway solutions for customers;
- partners for the distribution of Axway products, particularly in Asia/Pacific and Latin America;
- consultancy firms for Axway's solutions as part of their digital transformation missions.

Partners are key players in Axway's ecosystem and the Company therefore measures their satisfaction. The Net Promoter Score (NPS) indicator, whose methodology and system were previously described in this section of the document, provides essential information for working relations between Axway, its partners and its customers.

In 2022, the global partner satisfaction survey confirmed their strong commitment to Axway, with a score of 59 versus 49 in 2021.

Partner satisfaction	2022	2021	2020
NPS score	59	49	53

### 3.2.6 Suppliers

Supplier programmes and indicators are described in the Sustainable purchasing Section below.



## 3.3 Sustainable purchasing: enrich the supplier system

Axway's purchasing system has always integrated tools, charters and processes to contribute to business ethics, the fight against corruption, data security and the protection of individuals while respecting the laws of each country of operation.

For the past three years, Axway has been progressively completing its purchasing system to implement ever more sustainable processes. In 2022, further work was carried out to strengthen the sustainable purchasing system.

## Sustainable Purchasing

## 2023 Target

General	policy		
		<p>The sustainable purchasing procedure covers 100% of purchase agreements, which are reviewed by the Legal Department and include social responsibility clauses.</p> <p>The procedures are known and available on Jive, the Company's internal social network. The Legal Department discusses each purchase with the Business Unit and ensures that clauses similar or referring to the Axway Ethics charter are included and signed by the supplier or partner.</p> <p>The ethical tools and charters are shared with Axway's suppliers.</p> <p>Social and environmental responsibility clauses depending on the type of supplier are tailored to the category of service provider: purchases for internal use, purchases for external use, Original Equipment Manufacturers (OEMs), external products embedded in our offerings.</p> <p>The Purchasing platform centralises and secures the signing of supplier contracts and allows the Legal Department to control supplier selection.</p> <p>Audits and periodic inspections of purchasing procedures, performed by Axway's Internal Audit Department, are presented to the Audit Committee.</p>	<p>Strengthen the sustainable purchasing system</p> <p>Integrate new CSR indicators</p>
<b>Actions in 2022</b>			
<b>System</b>		Analysis of the purchasing system with a view to integrating CSR indicators into supplier selection.	
<b>Supplier mapping</b>		Mapping of Axway's main suppliers by type of purchase.	
<b>Measuring the carbon impact of supplier purchases</b>		Based on purchasing categories by supplier, selection of the top 100 suppliers to measure the carbon impact.	100% of suppliers
<b>New CSR indicators to be included in contracts</b>		<p>Adaptation of supplier contracts to incorporate the following environmental statements:</p> <ul style="list-style-type: none"> <li>Axway's carbon neutral ambition (for 2028) to which the supplier must adhere.</li> <li>undertaking from the supplier to provide Axway with the CO<sub>2</sub> equivalent of the relevant purchases (annually or on request).</li> </ul>	Main supplier contracts
<b>New tools to share</b>		<ul style="list-style-type: none"> <li>supplier carbon equivalent questionnaire;</li> <li>CSR report and 2028 carbon neutral commitment.</li> </ul>	Sustainable purchasing charter

**The objective for 2023 is to improve integration of CSR criteria into Axway's purchasing process.**

This work will involve several inventories, changes in tools and the gradual involvement of individuals concerned by the purchasing process.

Work to be undertaken in 2023 includes:

- inventory Axway's sustainable charters and tools already included in contracts;
- identify the percentage of suppliers who have signed Axway's business ethics charter;
- identify the percentage of suppliers targeted by contracts containing social and human rights clauses;

- identify the percentage of suppliers targeted by contracts that should contain environmental impact measurement clauses;
- publish the sustainable purchasing charter;
- analyse supplier diversity criteria for inclusion in the system;
- analyse the percentage of suppliers who have undergone an on-site CSR audit;
- develop sustainable purchasing training sessions for buyers;
- analyse possible actions to promote diversity in the supply chain;
- include suppliers assessed in the Green Taxonomy.

### 3.4 Ethical and sustainable tools

Axway's ethical and sustainable commitments are formally documented in tools and processes defined by recognised organisations, or audited by independent third parties.

Independent organisations to which Axway adheres:

- Middenext code;
- membership of Euronext Paris;
- United Nations Global Compact – active communication;
- CDP – Climate Disclosure Project;
- Gaia rating;
- EcoVadis – annual assessment of governance, social, sustainable purchasing and environmental performance.

All charters and commitments are available on Axway's website under the heading Ethics & anti-corruption.

#### Tools and procedures, trust in our business relationships



##### Ethics charter

The Ethics charter is applicable to employees, company officers, executives as well as stakeholders with which Axway works. Its purpose is to present Axway's key values 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 if necessary.

##### 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.

Given its international scope, Axway ensures compliance with

the rules on international sanctions and embargoes (whether issued by the UNSC, EU or FCPA). Close attention is also paid to countries with which Axway enters into contractual relations based on the Transparency International ranking. Depending on a country's ranking, an alert system in the contract management tool triggers a legal review or notifies the mention of an individual recorded in the list of blacklisted persons or entities (SDN List).

Corruption risk mapping: Axway Internal Audit Department has formally documented a map of corruption risks that is updated annually.

In addition, Axway has a gifts policy as part of the fight against fraud and corruption.

Ethics and anti-corruption training can be found in the Training Section of this document.

#### Declaration on the fight against modern slavery

While Axway is not subject to the UK and Australian Modern Slavery Acts, it has nonetheless formally documented a response on the fight against modern slavery through the Declaration available on its *website*.

All Axway's charters and commitments are available on its website.

#### 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.

To this end, a dedicated e-mail address (axway.ethics.notification@axway.com) is used to collect all reports, whatever their nature. The whistle-blowing procedure and the e-mail address can be accessed by all on the Axway *website*.

The whistle-blowing procedure meets the requirements of the Sapin II law, revised in 2022 following the publication of the Wasserman Act.

<i>Ethics and Anti-Corruption reports</i>	2022	2021	2020
Number of reports received	1	0	1
Number of reports processed	1	0	1

## 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 19 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.

### For customers:

- ISO 27001 certification
- SOC2 Type II audit
- GDPR personal data protection policy
- 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
- audit
- continuity of internal systems that can be accessed at any time from anywhere in the world
- continuity of cloud services for our customers

### 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
- business continuity plan based on the ability of all teams and departments to work from home
- internal training

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 data privacy information memorandum for each of its products on its website, to support its customers in their privacy compliance policies.

## Digital security

As a software publisher, digital security is central to the Company's processes. Axway ensures the security of its exchange processes and applications with all its stakeholders.

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 2022 Universal Registration Document.

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

#### Initiated in the context of COVID-19 in 2021 and continued in 2022:

- 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

#### 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

#### 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

## Digital Security training

Training sessions on best security practices last on average 60 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 2022, as in 2021, the internal "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.

	2022		2021		2020	
	number	hours	number	hours	number	hours
Security training						
Annual security training	1,530	2,382	3,726	2,029	2,944	2,208

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

## 3.5 Societal ambitions

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

For 2023 the objectives are unchanged:

### SOCIETAL

- ✗ ■ Net Promoter Score > 40 in 2023
- ✗ ■ Gold EcoVadis ranking in 2023
- ✓ ■ 4 local programmes in female digital education by end of 2023

## 4. Environmental Commitment: contribute to climate change mitigation

For the past five years, Axway has been committed to contributing to climate change mitigation. Work conducted to produce the carbon assessment published each year has enabled the approach to be structured into three stages: the measurement, reduction and ultimately the treatment of residual emissions from Axway's activities through offset measures.

Encouraged by regulatory developments, the Company has learned much from the annual carbon assessments, which gradually strengthen the involvement of management and employees in the approach. Accordingly, at the end of 2021, under the impetus of the Chief Executive Officer, Axway

embarked on a trajectory aimed at reducing its CO<sub>2</sub> emissions as much as possible by 2028.

2022 was a new step in the implementation of this environmental commitment. Work made it possible to clarify the carbon assessment data and scopes, improve the measurement of CO<sub>2</sub> emissions, particularly with suppliers, solicit new internal correspondents and communicate with employees to gradually initiate reduction measures.

Axway is therefore implementing a carbon system consistent with the climate targets set by the Paris Agreements, without resorting at this stage to financing third-party carbon offset, reduction or sequestration projects.

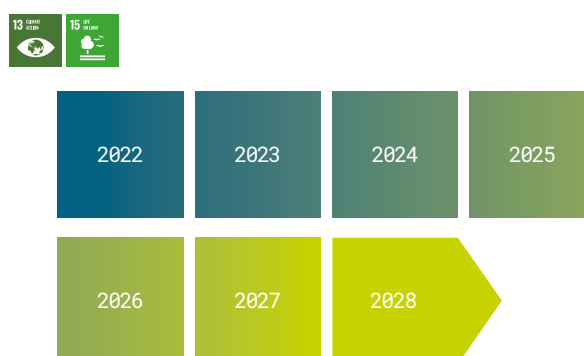
### 4.1 Emission reductions

#### Initial roadmap for a low carbon trajectory

Axway has identified the key stages of its low carbon trajectory for the next three years, i.e. an initial horizon of 2025 which will be a major milestone. To this end, the Company has determined the necessary operational system, the tools to be developed and the skills to be acquired to achieve its objectives.

Axway also strengthened its methodology and reporting by drawing on the most reputed rating guidelines and labels. Axway therefore applies the ADEME reference guide and coefficients to calculate its carbon emissions. In 2022, the Company contributed for the first time to the Carbon Disclosure Project (CDP) and will analyse the interest of integrating SBTi guidance in 2023.

#### Carbon trajectory



The following table summarises the work undertaken in 2022 and identified for 2025 :

2022	2023	2024	2025
Measurement	Measurement and reduction		
Measurement of scope 1 and 2 and partially 3 CO <sub>2</sub> direct and indirect emissions from internal activities. Inclusion of top 100 suppliers, representing 75% of total purchases, measured in CO <sub>2</sub> equivalent ADEME monetary ratio.	Extension of the CO <sub>2</sub> measurement scope to include scope 3 with 100% of suppliers (ADEME monetary ratio).	Comprehensive measure of all emissions for all Axway activities by gradually including the various stakeholders.	Axway global operational measurement and reduction system.
Initial analyses with a view to reducing emissions for internal activities.	Launch of reduction programmes for internal activities. Initial analyses of the impact of Axway products used by its customers.	Continuation of reduction programmes for internal activities. Mapping of emissions tied to Axway products and used by its customers.	Initial contributions to offset or carbon capture programmes.
Creation of a dashboard to collect data and monitor emissions.	Improve tools and dashboard for managing programmes with a view to reducing emissions.	Centralised measurement and reduction tools by activity and emission source.	Integration of environmental criteria into purchasing choices relating to Axway product development.

2022	2023	2024	2025
Measurement	Measurement and reduction		
Sustainable purchasing: analysis of the system.	Launch of a new sustainable purchasing system and update of tools shared internally and with suppliers.	Integration of environmental indicators into contractual purchasing tools.	100% of suppliers included in the sustainable purchasing process.
Green Taxonomy: proportion of so-called "sustainable" sales, OpEx and CapEx for climate change mitigation and adaptation.	Green Taxonomy: proportion of so-called "sustainable" sales, OpEx and CapEx for the six environmental objectives.	Gradual inclusion of alignment criteria in Axway's CapEx and OpEx investment decision process.	
CDP: initial response to the simplified questionnaire based on 2021 data.	CDP: contribution to the full questionnaire. SBTi: analyse with a view to committing to this standards base.	SBTi: progress with the project to integrate this standards base.	SBTi: progress with the project to integrate this standards base.
Internal team dedicated to the carbon programme	Changes in regulations or standard bases, particularly CSRD.	CSRD: changes in regulations or standard bases.	CSRD: changes in regulations or standard bases.
Communication with all employees. First global Axway Cyber Clean-Up.	Employee involvement in environmental programmes. Second cyber clean-up. Training sessions.	Interest in creating a CSR and Low-Carbon Community internally or with certain stakeholders.	Analyses for innovation or co-innovation to reduce CO <sub>2</sub> emissions with employees or customers.

## 4.2 Environmental: 2023-2028 objectives

Targets set in 2021	2022 context and programmes	2021 Baseline	2022 Score	2023 Target
10% reduction in paper consumption in 2022 vs. 2019.	Target achieved vs. 2019, last reference year without health restrictions.	544 reams	383 reams	Expansion of the programme
Two cyber clean-up days by end-2023.	Target achieved for 2022, first day organised.	0 days	1 day	1 day
Contribution to carbon neutrality by 2028.	More comprehensive measurement, first reduction initiatives.	1,302 T eq. CO <sub>2</sub> (scopes 1 and 2)	1,422 T eq. CO <sub>2</sub> (scopes 1 and 2)	1,361 T eq. CO <sub>2</sub> (scopes 1 and 2)

## 4.3 2022 external assessments

Axway contributes annually to indexes and programmes assessing its Environmental Commitment. These declarative studies allow Axway to measure programme progress and compare them to available benchmarks.

These evaluations, ratings or scores are made public and shared with Axway's various stakeholders including in the business and supplier selection processes.

Environmental Assessments	2022	2023 Target
Carbon assessment, ADEME methodology	Scope 1, 2, 3 partial	Scope 1, 2, 3 full
Gaia Rating	Environment score 71 vs. 54 Y-1	Environment score + full scope 3.
EcoVadis	Environment score 70/100 vs. 70 Y-1	Environment score + full scope 3.
CDP	First questionnaire in 2022 based on 2021 data	Full questionnaire
Science Based Targets (SBTi)	-	Assessment of SBTi indicators for commitment to the approach.

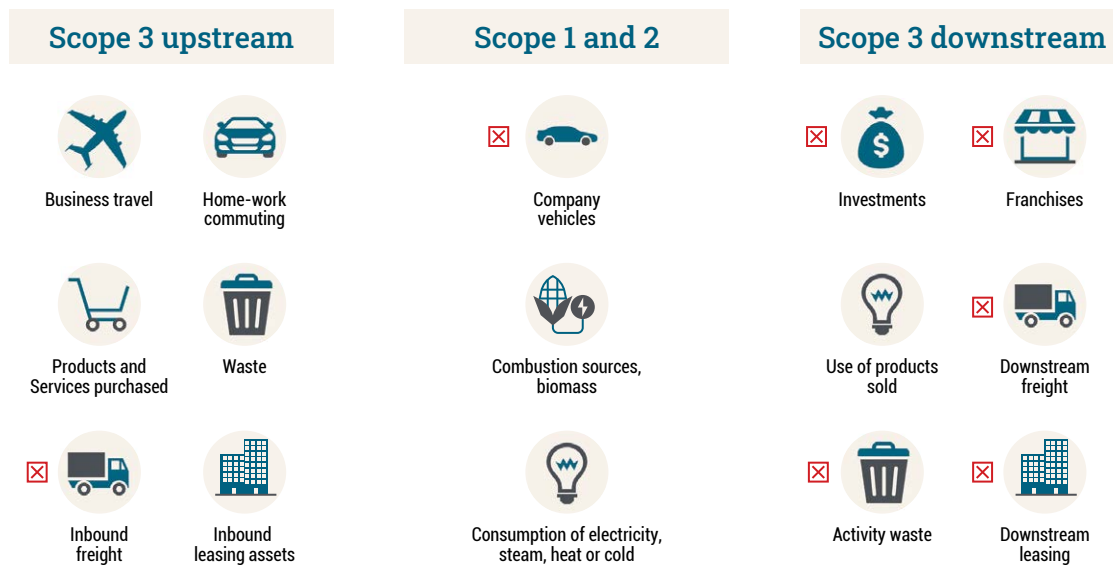



## 4.4 Programmes in 2022

Axway strengthened the measurement of its environmental impact in 2022. The mapping of emission sources and new carbon data collection methods improved the system.

### Mapping of CO<sub>2</sub> emission sources in Axway's activities

#### Initial mapping of Axway's CO<sub>2</sub> emission sources



 Sources of emissions for which Axway is not eligible. Company vehicles are included in Assets under inbound leasing as they are not owned by Axway. Regarding Investments, Axway does not hold any minority interests in other companies.

#### Scope of CO<sub>2</sub> emission measures for activities:

Axway's carbon assessment is conducted in six countries, which together represent 95% of the Company's surface area, 78% of its workforce and 7% of revenue: USA, France, Germany, Romania, Bulgaria and Ireland.

#### Work carried out in 2022

Using the emissions mapping, work in 2022 focused on collecting more comprehensive data relevant to measurements. This measurement work consolidates the system which would be rolled-out in 2023 based on the objectives presented in this table.

Emission sources	Actions in 2022	2023 Target
<b>Upstream scope 3</b>		
Business travel	Full measurement of CO <sub>2</sub> equivalent for business travel by collecting data at the source from local travel agencies or transport companies.	<b>Rationalisation of business travel.</b>
Home-work commuting	Inclusion of this emission source.	<b>Employee survey for an initial impact measurement.</b>
Products and services purchased	Direct data collection or assessment using the ADEME monetary ratio for the top 100 Axway suppliers for purchases of scope 3 products and services.	<b>Strengthening of the impact measurement.</b>
Waste collection, recycling and circular economy	Inventory by country.	Standardisation of waste collection and recycling systems in the six countries of the scope, to integrate our business in the circular economy.



Emission sources	Actions in 2022	2023 Target
Inbound leasing assets	Business vehicles: inventory of the business vehicle fleet, vehicle type, fuel consumption. Measurement of CO <sub>2</sub> equivalent. Initial contract analyses.	Opportunity study of shift to electric vehicles.
<b>Scopes 1 and 2</b>		
Company vehicles	Inclusion of vehicle fuel.	Vehicle policy.
Consumption of electricity, steam, heat or cold	Measurement of emissions and by resource type. Initial contract analyses.	Analysis of green contracts.
<b>Scope 3</b>		
Investments	Not considered at this stage.	To be reassessed.
Use of products sold	Not measured, initial internal discussions.	Initial measurement of the impact of Axway products.
Downstream leasing	Not considered in 2022.	To be reassessed.

Throughout the data collection process, the CSR team was able to improve the tools and processes to stabilise them and a sustainable data collection system in Axway's various countries and departments.

Specific actions were therefore undertaken in the following areas:

System	Actions in 2022
Steering	<ul style="list-style-type: none"> <li>Improvements to the data collection system</li> <li>Selection and initial testing of an emissions calculation platform</li> <li>Appointment of a manager by activity</li> <li>Design of a programme monitoring dashboard</li> <li>Involvement of new employees</li> </ul>
Working from home	The home office system leads to a structural reduction in energy consumption at premises and transport.
Use of premises	An internal discussion session was led by the Chief Executive Officer on the use of premises and related expectations as part of considerations on rationalising office space.
Heating and air conditioning	As a tenant at all its sites, Axway seeks to optimise energy performance. When leases are renewed, the premises are equipped with modern heating and air-conditioning systems meeting current environmental standards. For example, the French site at Paris La Défense has a high-performing air conditioning and heating network which operates using the county's waste (Enertherm). Operating hours were programmed for the heating system which is switched off in the evening and on weekends. This automatically led to a reduction in energy consumption. Overall, a comparison of two years of activity under normal conditions (2019 and 2022), shows a 9% reduction in energy consumption from 5,898 to 5,376 MWh.
Video conferencing	In general, the use of video conferencing is recommended and has continued to increase as people work from home.
Electronic signature	Electronic signature tools are widespread and significantly used.
Employee IT equipment	Standard employee equipment – work stations, office equipment – is renewed on average every 3 years. In France, as part of the roll-out of the Future of Work policy, Axway entered into a partnership with a leasing company which provides supplies and equipment useful for home working.
Donation of equipment	Computer equipment donations help extend the life of equipment. Equipment is offered to employees for their personal use or to non-profit associations.
Computer servers on Axway sites	For the hosting of proprietary or customer data, Axway enters into service contracts with leading market players committed to sustainable initiatives. In France, Axway has outsourced the machine room for production applications and is supported by a service provider with an eco-friendly label.

## Key figures for actions in 2022

Electronic signature	2022	2021	2020
Number of files signed	16,555	19,572	9,671
Number of pages signed	76,642	97,247	46,571
<i>Paper reams ordered</i>			
France	210	197*	150
USA	98	152	163
Romania	0	75	50
Bulgaria	25	15	40
Ireland	0	5	10
Germany	50	100	40
<b>Total</b>	<b>383</b>	<b>544</b>	<b>453</b>
* The amount of 195 published in 2021 has been corrected.			
<i>Waste collection (in kg) (France)</i>			
Plastic	487	186	64
Ink cartridges	36	0	13
Paper & cardboard	3,575	3,429	2,823
Cans	0	0	5
Bulky waste	177	8	91
Waste electrical and electronic equipment	567	254	239
<b>Total in kg</b>	<b>4,842</b>	<b>3,869</b>	<b>3,235</b>
Donations of IT equipment, computers, screens, etc. (in units)	622	656	360

## 4.5 Carbon assessment

### 4.5.1 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 Company's activities on the environment.

The BEGES was completed by an independent service provider with a Bilan Carbone® license issued by the Association Bilan Carbone (ABC) for 2022. It was drawn up based on the updated official greenhouse gas emissions assessment in

accordance with version 5 of the assessment production methodology published in July 2022 by the French Ministry for Ecological Transition. The methodology is aligned with the GHG Protocol methodology.

Axway's reporting uses CO<sub>2</sub> metric tons equivalent (carbon dioxide), as its measurement unit, that is taking into account all greenhouse gases responsible for climate change.

Regarding energy consumption only, the assessment period for year Y extends from 1 October Y-1 to 30 September Y, and this since Axway began measuring its scope 1 and 2 emissions (permanence of methods). For other items, the period is the calendar year.

#### Geographic scope and network of correspondents:

Six main countries where Axway operates, representing 80% of the total surface area of premises: France, United States, Germany, Romania, Bulgaria, Ireland.

#### GHG assessment period:

from 1 October Y-1 to 30 September Y.

## 4.5.2 Axway 2022 carbon assessment results: scopes 1 and 2

The carbon report identifies greenhouse gas emissions of 1,287 (T eq. CO<sub>2</sub>):

### Greenhouse gas emissions

- Direct greenhouse gas emissions in CO<sub>2</sub> metric tons equivalent amounted to 130 T eq. CO<sub>2</sub>;
- indirect greenhouse gas emissions associated with the production of imported electricity, heat or steam, in CO<sub>2</sub> metric tons equivalent amounted to 1,157 T eq. CO<sub>2</sub>;
- and finally, other indirect GHG emissions (line power losses) in CO<sub>2</sub> metric tons equivalent amounted to 135 T eq. CO<sub>2</sub>.

Thus, total GHG emissions by the Axway Group within the scope defined above totalled 1,422 T eq. CO<sub>2</sub>. The 2020 and 2021 assessments were updated with current emission factors, as recommended by the Ministry in its methodology.

### Carbon footprint and intensity

The reported carbon footprint on which Axway can act directly through its policy is therefore 1,287 T eq. CO<sub>2</sub>. Estimated carbon intensity is obtained by dividing the carbon footprint in absolute terms by revenue, *i.e.* 4.09 T eq. CO<sub>2</sub>/€ million of revenue.

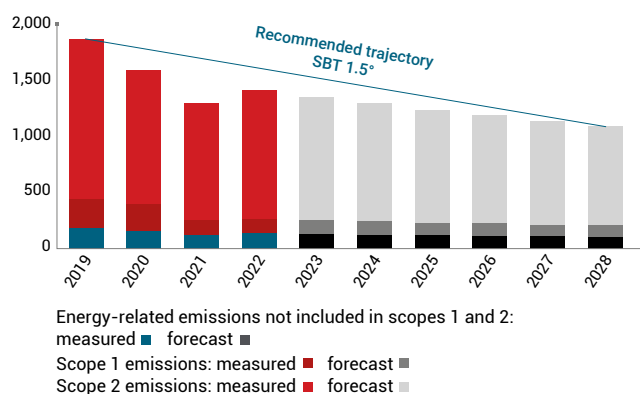
#### Reported carbon footprint (absolute value)

Scopes 1 & 2  
**1,287**  
T eq CO<sub>2</sub>

#### Estimated carbon intensity (scopes 1 and 2)

**4.09**  
T eq CO<sub>2</sub>/  
Revenue  
in € million

### Historical analysis of energy-related emissions



The above graph presents trends in scope 1 and 2 emissions plus energy-related emissions not included in scopes 1 and 2 but closely linked to them since 2019.

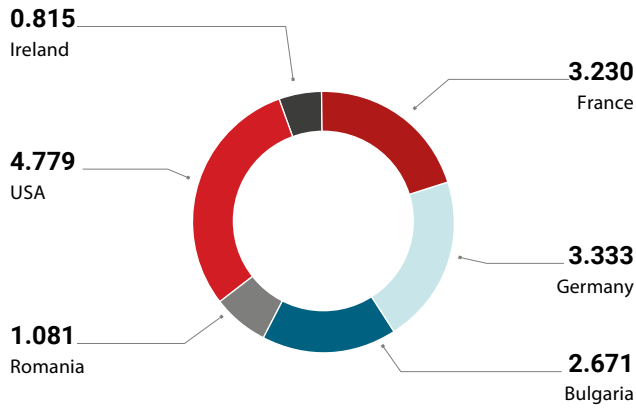
The decrease observed in 2020 and 2021 is largely due to the various lockdowns and travel restrictions related to the COVID-19 pandemic. While in 2021 remote working was still recommended in many countries and favoured by employees, in 2022 a gradual return to a regular presence at the office was noted.

The observed increase of 8.6% (+110 T eq. CO<sub>2</sub>) between 2022 and 2021 would not therefore appear to reflect Axway's true trajectory. If we compare 2022 to 2019 as the last reference year, we observe a 24% decrease in emissions (-453 T eq. CO<sub>2</sub>) which more accurately reflects the impact of remote working as a common practice for all Axway employees.

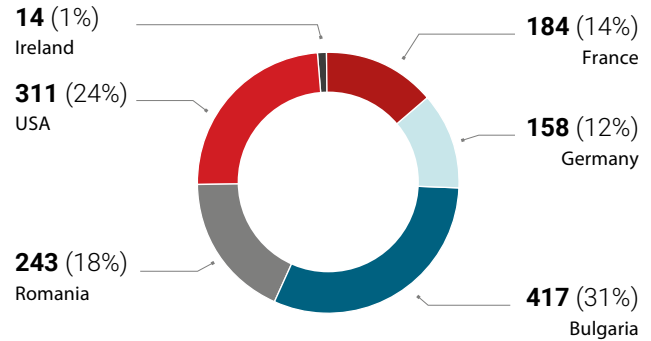
**This result can be considered alongside a 1.5°C SBT (Science Based Targets) trajectory, for a reduction in emissions of around 4.2% per year. This projection allows the Company to model and plan its action plans more concretely.**

### 4.5.3 Breakdown of 2022 carbon assessment results

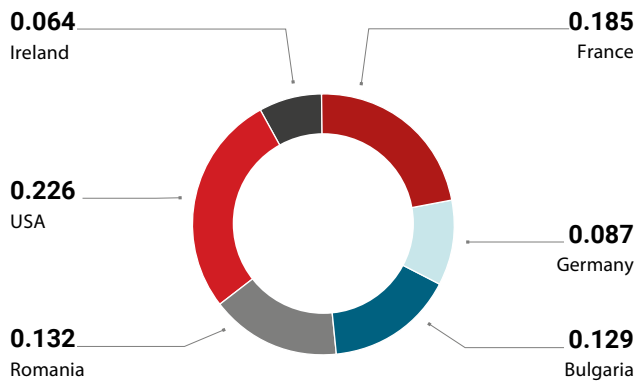
Breakdown of greenhouse gas (GHG) emissions in T eq. CO<sub>2</sub> by person and country



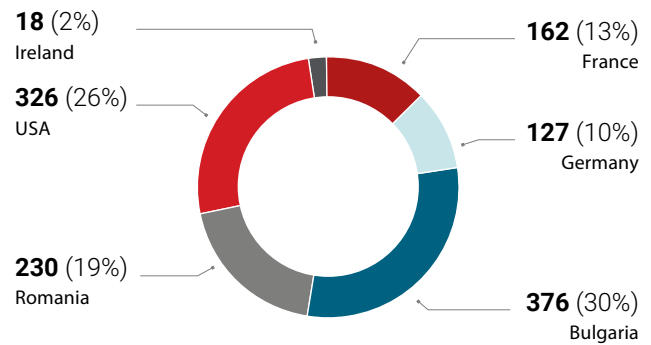
Breakdown of greenhouse gas (GHG) emissions by country 2022



Breakdown of greenhouse gas (GHG) emissions in T eq. CO<sub>2</sub> by m<sup>2</sup>



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

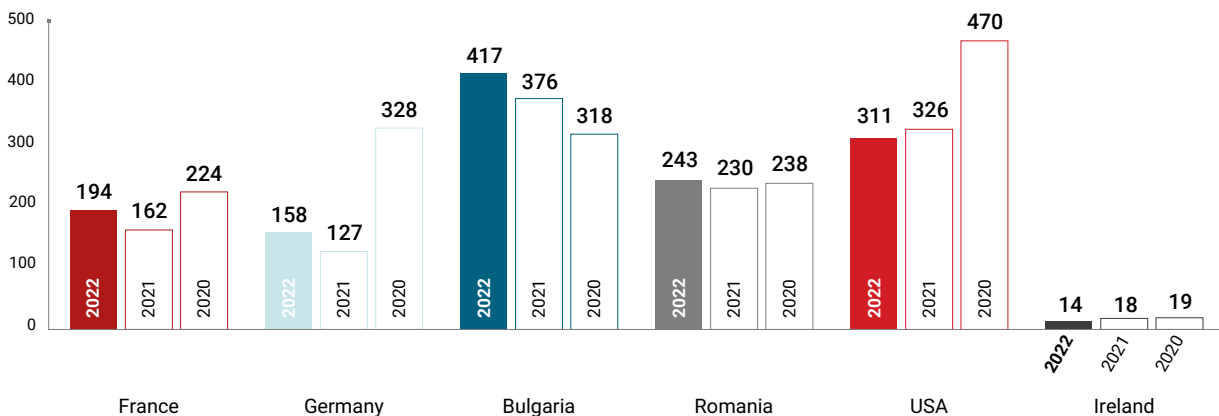


Change in greenhouse gas emissions in T eq. CO<sub>2</sub>

#### By country from 2020 to 2022

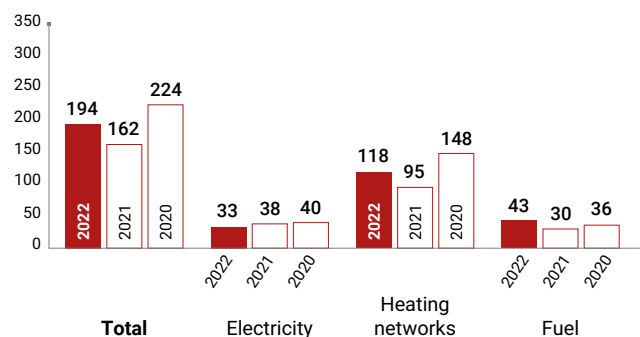
In 2022, scope 1 and 2 emissions increased in France, Germany and Bulgaria where employees returned partially to the office after two years of COVID.

\* The USA amount published in 2021 has been corrected.



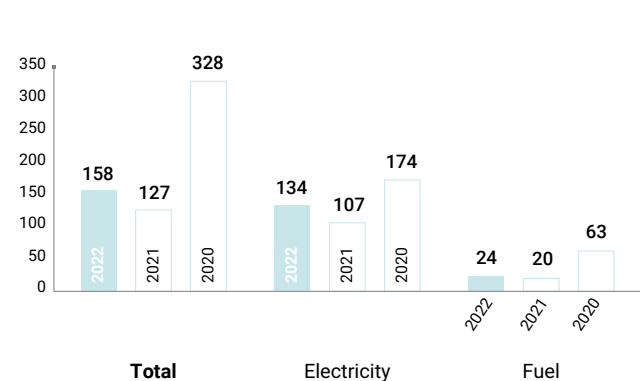
Change in greenhouse gas emissions in T eq. CO<sub>2</sub>

France



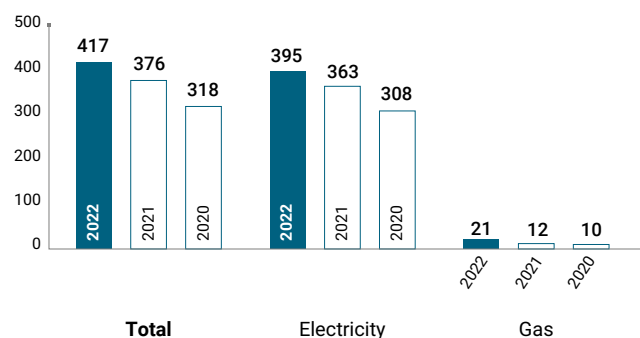
Change in greenhouse gas emissions in T eq. CO<sub>2</sub>

Germany



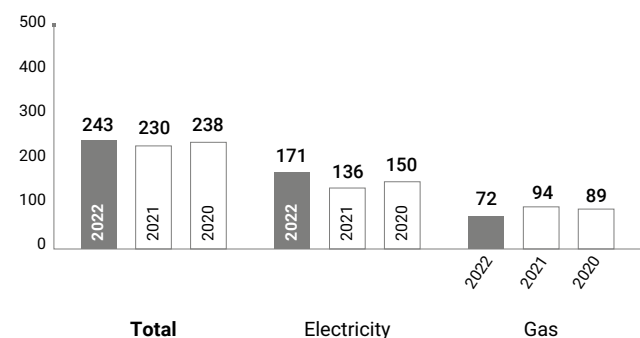
Change in greenhouse gas emissions in T eq. CO<sub>2</sub>

Bulgaria



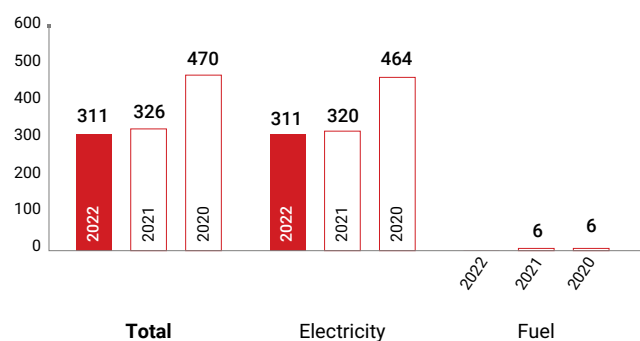
Change in greenhouse gas emissions in T eq. CO<sub>2</sub>

Romania



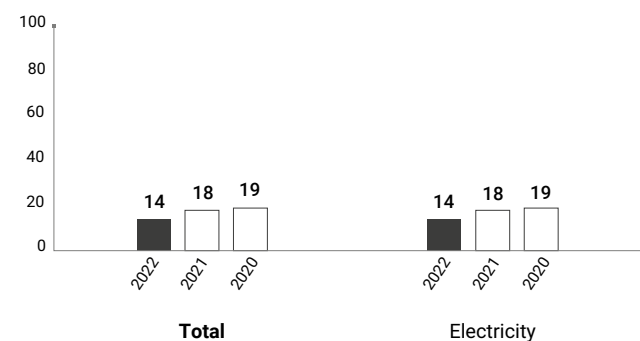
Change in greenhouse gas emissions in T eq. CO<sub>2</sub>

USA (Phoenix)



Change in greenhouse gas emissions in T eq. CO<sub>2</sub>

Ireland



#### 4.5.4 Axway 2022 carbon assessment results: scope 3

##### Upstream scope 3

Axway's upstream scope 3 analysis focuses on emission sources presented in the mapping, namely:

- business travel;
- purchase of products and services;
- paper consumption and waste collection;
- depreciation of computer equipment assets (keyboards, monitors, computers, etc.).

##### Extension of upstream scope 3 analysis in 2022

In 2021, for the first year, Axway performed a scope 3 analysis of its purchases of products and services used in activities. The top 50 suppliers essential to our operations were selected for this first analysis. They mainly concerned purchases of services, such as advisory services, communication, telecommunications, business travel and sub-contracting, as well as purchases of software licenses and subscriptions and IT sub-contracting services. This limited first analysis enabled Axway to address the issue of scope 3 emissions. The Company realised that few suppliers were communicating on their own carbon footprint. Monetary ratios were therefore used.

At the end of 2022, measurement of the impact of purchases was extended to the top 100 suppliers, representing 75% of Axway's purchases. A monetary ratio approach was again adopted due the lack of available actual data.

In addition, several other emission sources were added or clarified to measure 2022 scope 3 emissions, and particularly the impact of business travel and leased assets.

**Axway aims to improve its measurement of scope 3 emissions each year.**

##### Categories of products and services measured in scope 3

As a software publisher, IT purchases represent a significant portion of Axway's expenses. The most important purchasing items include:

- data hosting;
- software;
- integration or advisory services;
- IT hardware;
- premises;
- marketing services and resources.

Upstream scope 3 emissions therefore represent 10,351 T eq. CO<sub>2</sub> in 2022.

Emission source	Clarification	2022 in T eq. CO <sub>2</sub>
Purchase of products and services	For 100 suppliers (75% of purchases).	9,003
Fixed assets	For IT hardware depending on their accounting depreciation period.	423
Waste	France.	2
Business travel	Plane and train (6 countries).	923
<b>Total</b>		<b>10,351</b>

##### Downstream scope 3

As the study did not encompass emissions resulting from the use of products sold by Axway, there are currently no emissions included in downstream scope 3 emissions.

##### Summary of scopes 1 and 2 and upstream scope 3

Reported carbon footprint (absolute value)	Estimated carbon intensity (scopes 1 and 2)	Carbon footprint – Emissions (upstream scope 3)	Estimated carbon intensity (upstream scope 3)
Scopes 1 & 2 <b>1,287</b> T eq CO <sub>2</sub>	<b>4.09</b> T eq CO <sub>2</sub> / Revenue in € million	<b>10,351</b> T eq CO <sub>2</sub>	<b>33</b> T eq CO <sub>2</sub> / € million of revenue

#### 4.5.5 Low carbon target: build a stronger measurement base for concrete actions

This first measurement base, which is relatively comprehensive for upstream scope 3 emissions, will be expanded in 2023 to include all purchases of products and services. Axway's main suppliers will be contacted to gather their emission factors more efficiently and obtain real data where possible.

The analysis of commuter travel based on an employee survey will further refine this measure.

With regard to downstream scope 3 emissions, that is the footprint for Axway products and services used and installed at customer premises, we can estimate, for an initial approach, that the carbon footprint mainly relates to host servers. This footprint is therefore probably already included in Axway's carbon footprint or that of the customer through their purchases.

According to the ADEME definition, a company cannot claim to be carbon neutral but can contribute to the neutrality ambitions of a region. Axway contributes to this momentum by measuring its emissions, implementing reduction actions and through its desire to limit as much as possible its residual emissions.

#### 4.5.6 Green Taxonomy

##### 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".

From fiscal year 2022, companies must publish the proportion of revenue, capital expenditure and operating expenditure associated with economic activities that are:

- "eligible", i.e. classified in the European Taxonomy;
- "aligned" or "sustainable", i.e. comply with the technical criteria related to each of the eligible activities: makes a substantial contribution to one of the six environmental objectives, does no harm to the other five environmental objectives and complies with minimum social safeguards.

For 2022, information is required for only two of the six environmental objectives, those of climate change mitigation and adaptation.

No comparative data is required for 2021 with respect to alignment.

The Group conducted an in-depth analysis of all its activities in its various consolidated entities. This analysis was performed jointly by the CSR Department, the Finance Department and the operating departments.

##### Scope

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

The financial data was taken from the 31 December 2022 accounts. Revenue and capital expenditure figures can be reconciled with the financial statements.

##### Financial indicator calculation methodology

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 portion of ratios eligible under the taxonomy.

##### 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 100 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 is a software publisher and a major digital transformation player. The services provided as part of its Software activities comprise software user rights (licenses), 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 sub-contracted by Axway 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 sub-contracted by Axway to a third-party hosting provider.

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

This Cloud offering can provide our customers with the means to achieve their own climate targets.

In addition, the Group selects leading hosting providers that have defined a low-carbon trajectory (approach aimed at reducing greenhouse gas emissions by 2025).

Finally, the Group confirmed its commitment to contributing to carbon neutrality in 2028.

Axway identified its eligible activities 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 portion of Axway Managed revenue corresponds to this activity. However, any hosting activity performed using third party infrastructures is excluded from the application scope of the Taxonomy. As Axway sub-contracts its Axway Managed and Customer Managed hosting services (Software as a Service portion), the related Group activities are not currently eligible under 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, the Group has not recognised the eligibility of its revenue under activity 8.2.

With regard to the "climate change adaptation" environmental objective, the Group 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 its revenue as eligible with regard to this environmental objective.**

Axway's analysis leads us to conclude that Axway's activities do not fall within the highest greenhouse gas emitting activities targeted by the Taxonomy. At the same time, Axway's activities are not considered enabling activities. Nonetheless, the Group is implementing progress actions in favour of the climate, the results of which are measured through performance indicators published in the Non-Financial Performance Statement (or this document).

To conclude, Axway's economic activities do not substantially contribute to these first two environmental objectives. The proportion of revenue associated with eligible and aligned sales is therefore nil in fiscal year 2022. The proportion of revenue associated with eligible sales was nil in fiscal year 2021.



## Corporate responsibility Non-financial performance statement AFR/NFPS

Environmental Commitment: contribute to climate change mitigation

### The regulatory model for 2022 revenue is presented below:

(in thousands of euros)

(in thousands of euros)

		Substantial contribution criteria							
Economic activities	Code(s)	Absolute revenue	Proportion of revenue	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems
		Amount	%	%	%	%	%	%	%
A. Taxonomy-eligible activities									
A.1. Environmentally sustainable activities (Taxonomy-aligned)									
n/a		0	0.0%	0.0%	0.0%	n/a	n/a	n/a	n/a
Revenue of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0	0.0%	0.0%	0.0%	n/a	n/a	n/a	n/a
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)									
n/a		0	0.0%						
Revenue of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		0	0 %						
TOTAL (A.1 + A.2)		0	0.0%	0 %	0 %	n/a	n/a	n/a	n/a
B. Taxonomy-non-eligible activities									
Revenue of Taxonomy-non-eligible activities (B)		314,031	100%						
License		11,584	4%						
Subscription		153,984	49%						
Maintenance		111,161	35%						
Services		37,303	12%						
TOTAL (A + B)		314,031	100%						

DNSH criteria ('Do No Significant Harm')							Taxonomy -aligned proportion of revenue, year N	Taxonomy -aligned proportion of revenue, year N-1	Category (enabling activity or)	Category (transitional activity)
Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Minimum safeguards				
Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	%	E	T
n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.0%	n/a	n/a	n/a
n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.0%	n/a	n/a	n/a
N/A	N/A	N/A	N/A	N/A	N/A	N/A				
N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A

Non-eligible activities refer to note 3.1 to the Consolidated Financial Statements.

### Capital Expenditure – 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 right to use leased buildings.

Axway eligible CapEx in 2022 accounted for 41.7% of total CapEx of €3.0 million (see Notes 8.4 and 9.1 to the Consolidated Financial Statements). In 2021, eligible CapEx accounted for 38.1% of total CapEx of €3.7 million.

In 2022, the Group assessed whether its investments complied with the technical screening criteria and concluded that 2022 CapEx did not contribute substantially to the achievement of one of the two green taxonomy climate objectives. The Group did not therefore conduct any additional investigations concerning the Do Not Significant Harm (DNSH) criteria and compliance with minimum social safeguards.

Eligible activity	Technical screening criteria for the climate change mitigation objective
<b><u>6.5 Transport by motorbikes, passenger cars and light commercial vehicles</u></b>	<p>(a) for vehicles of category M1 and N1, both falling under the scope of Regulation (EC) No 715/2007:</p> <p>(i) until 31 December 2025, specific emissions of CO<sub>2</sub>, as defined in Article 3(1), point (h), of Regulation (EU) 2019/631, are lower than 50gCO<sub>2</sub>/km (low- and zero-emission light-duty vehicles);</p> <p>(ii) from 1 January 2026, specific emissions of CO<sub>2</sub>, as defined in Article 3(1), point (h), of Regulation (EU) 2019/631, are zero;</p> <p>(b) for vehicles of category L, the tailpipe CO<sub>2</sub> emissions equal to 0g CO<sub>2</sub>eq./km calculated in accordance with the emission test laid down in Regulation (EU) 168/2013.</p>
<b><u>7.7 Acquisition and ownership of buildings</u></b>	<p>For buildings built before 31 December 2020, the building has at least an Energy Performance Certificate (EPC) class A. As an alternative, the building is within the top 15% of the national or regional building stock expressed as operational Primary Energy Demand (PED) and demonstrated by adequate evidence, which at least compares the performance of the relevant asset to the performance of the national or regional stock built before 31 December 2020 and at least distinguishes between residential and non-residential buildings.</p> <p>For buildings built after 31 December 2020, the building meets the criteria specified in Section 7.1 of this Annex that are relevant at the time of the acquisition.</p> <p>Where the building is a large non-residential building (with an effective rated output for heating systems, systems for combined space heating and ventilation, air-conditioning systems or systems for combined air-conditioning and ventilation of over 290 kW) it is efficiently operated through energy performance monitoring and assessment.</p>
<b><u>8.1 Data processing, hosting and related activities</u></b>	<p>The activity has implemented all relevant practices listed as:</p> <p>expected practices in the most recent version of the European Code of Conduct on Data Centre Energy Efficiency, or in CEN-CENELEC document CLC TR50600-99-1 "Data centre facilities and infrastructures – Part 99-1: Recommended practices for energy management".</p> <p>The implementation of those practices is verified by an independent third-party and audited at least every three years.</p> <p>The global warming potential (GWP) of refrigerants used in the data centre cooling system does not exceed 675.</p>



## The regulatory model for 2022 CapEx is presented below:

(in thousands of euros)

(in thousands of euros)		Substantial contribution criteria							
Economic activities	Code(s)	Absolute CapEx	Proportion of CapEx	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems
		Amount	%	&	%	%	%	%	%
A. Taxonomy-eligible activities									
A.1. Environmentally sustainable activities (Taxonomy-aligned)									
6.5. Transport by motorbikes, passenger cars and light commercial vehicles		0	0%	0%	0%	n/a	n/a	n/a	n/a
7.7. Acquisition and ownership of buildings		0	0%	0%	0%	n/a	n/a	n/a	n/a
8.1. Data processing, hosting and related activities		0	0%	0%	0%	n/a	n/a	n/a	n/a
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0	0%	0%	0%	n/a	n/a	n/a	n/a
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)									
6.5. Transport by motorbikes, passenger cars and light commercial vehicles		146	5%						
7.7. Acquisition and ownership of buildings		793	26%						
8.1. Data processing, hosting and related activities		315	10%						
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		1,254	42%						
TOTAL (A.1 + A.2)		1,254	42%	0 %	0 %	n/a	n/a	n/a	n/a
B. Taxonomy-non-eligible activities									
Revenue of Taxonomy-non-eligible activities (B)		1,751	58%						
TOTAL (A + B)		3,005	100%						

Operating expenditure is defined as direct costs that cannot be capitalised and includes 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. It represents the denominator for the OpEx KPI calculation for a total of €72.0 million in 2022, compared to €71.0 million in 2021.

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

## The regulatory model for 2022 OpEx is presented below:

### DNSH criteria

(in thousands of euros)

(in thousands of euros)

Economic activities	Code(s)	Substantial contribution criteria							
		Absolute OpEx	Proportion of OpEx	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems
		Amount	%	%	%	%	%	%	%
A. Taxonomy-eligible activities									
A.1. Environmentally sustainable activities (Taxonomy-aligned)		0	0%						
Activity 2		0	0%	0%	0%	n/a	n/a	n/a	n/a
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0	0%	0%	0%	n/a	n/a	n/a	n/a
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)									
6.5. Transport by motorbikes, passenger cars and light commercial vehicles		25	0%						
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		25	0%						
TOTAL (A.1 + A.2)		25	0%						
B. Taxonomy-non-eligible activities									
OpEx of Taxonomy-non-eligible activities (B)		72,456	100%						
TOTAL (A + B)		72,481	100%						

DNSH criteria (Do No Significantly Harm')							Taxonomy -aligned proportion of OpEx, year N	Taxonomy -aligned proportion of OpEx, year N-1	Category (enabling activity)	Category (transitional activity)
Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Minimum safeguards	%	%	E	T
Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N				
n/a	n/a	n/a	n/a	n/a	n/a	n/a	0%	n/a	n/a	n/a
							0%	n/a	n/a	n/a
							0%	n/a	n/a	n/a

## 4.6 2023-2028 Environmental targets

Building on Axway's 2022 programmes and new measures implemented to contribute to climate change mitigation, the Company will continue to make progress in 2023 and beyond.

Communication with employees, their training and their commitment will become increasingly important in the coming years, helping to create value for all in the interests of the environment.

### 2023-2028 Objectives and key figures

#### ENVIRONMENTAL

- ✓ ■ 2 Cyber Clean-Up Days by end of 2023
- ✗ ■ Carbon neutrality by 2028



# Corporate responsibility Non-financial performance statement AFR/NFPS

Environmental Commitment: contribute to climate change mitigation

## Summary of Axway's CSR commitments, indicators and key figures by stakeholder

Commitment	Programme	Indicator	2022 Performance	2023 Objective: quantitative or qualitative	SDG	Stakeholder					
						Employees	Customers	Suppliers	Partners	Shareholders & Investors	Societal Organisations
Social-Employer	Employee engagement	AVS	61%	70%	SDG 8	x					
	Diversity	% of women in the workforce	31%	33%	SDG 5 SDG 10	x					x
		% of people with disabilities (France)	1.82%	+25%	SDG 10	x					x
	Talent development	Number of training days per employee	1.97%	Further growth	SDG 4	x	x		x		
	Fulfilling work environment	Future of Work, balance on-site/home working	60/40%	60/40%	SDG 3 SDG 8	x					
	Social Dialogue	Official bodies, agreements and communication	Permanent	Permanent	SDG 8	x					x
	Communicating the strategy	Frequent Executive Management meetings with employees	Permanent	Permanent	SDG 8	x					
Societal	Digital security	Certificates	Ongoing programmes	Ongoing programmes	SDG 8						
		Number of training sessions				x	x	x	x	x	x
		Process									
	Sharing digital skills	Increased number of women and people with disabilities	4 programmes	4 programmes	SDG 5 SDG 10	x					x
	Customer and partner satisfaction	NPS indicator, customers	35	40	SDG 8						
		NPS indicator, partners	59	Further growth							
		EcoVadis rating	61/100	72/100		x	x		x		
		Recognition of business analysts	Gartner & Forrester	Further growth							
	Leading projects with ethics and responsibility	Sustainable purchasing system	Partial	Main suppliers	SDG 8 SDG 16						
		Sustainable Purchasing charter	Draft	Finalised		x	x	x	x	x	x
		Ethics charter, Anti-modern slavery	Existing	Existing							
		Whistle-blowing procedure	Existing	Existing	SDG 8 SDG 16	x	x	x	x		
		Middlenext Code	Existing	Existing	SDG 8 SDG 16						
		Securities Trading Code of Conduct							x		
		Euronext Paris listing									
Environmental	Carbon trajectory	Scopes 1, 2 and 3	1,287 T eq. CO2 scopes 1 and 2; 10,351 T eq. CO2 scope 3	Reduction	SDG 13 SDG 15						
		Reduction in paper	10% reduction	New materials							
		Recycling	99%	100%		x	x	x	x	x	x
	Engaging employees in the carbon trajectory	Cyber clean-up	1	1							
		Business travel	Measured	Reduce							
	Green Taxonomy	Revenue, CapEx, OpEx	2 environmental objectives	6 environmental objectives							

\* 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 3.1 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 Middlednext 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 and 2022, given the refocusing of Axway's activities on its flagship products and the strengthening of certain subjects and particularly environmental issues. The matrix was validated by the Appointments, Governance and Corporate Responsibility Committee.

## Employee information

### 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.

In addition, Axway has not defined any circular economy targets.

## Carbon assessment

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 CO<sub>2</sub> 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.

### 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.

## Information excluded

The following information (required by Article L. 225-102.1 of the French Commercial Code) was excluded as not applicable to Axway's activities: fight against food waste, fight against food insecurity, respect for animal welfare, and sustainable food.

## Certificate of disclosure by an Independent Third Party

### Verifying auditor's report

Year ended 31 December 2022

Dear Shareholders,

Further to a request by Axway Software SA (hereinafter the "entity") and in our capacity as an independent third party ("third-party") certified by COFRAC under number 3-2013 (Cofrac Inspection Accreditation, scope available at [www.cofrac.fr](http://www.cofrac.fr)), we have conducted procedures aimed at

issuing a reasoned opinion expressing a moderate assurance conclusion on the historical information (observed or extrapolated) in the non-financial performance statement prepared in accordance with the entity's procedures (hereinafter the "Guidelines"), for the year ended 31 December 2022 (hereinafter the "Information" and the "Statement", respectively), presented in the Group management report in accordance with the provisions of Articles L. 225-102-1, R. 225-105 and R. 225-105-1 of the French Commercial Code (code de commerce).

## Conclusion

Based on the procedures we conducted, as described in the section "Nature and scope of our procedures" and the information we gathered, 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.

## Preparation of the Non-Financial Performance Statement

The absence of a generally accepted and commonly used reference framework or established practices on which to base the assessment and measurement of the Information enables the use of different but acceptable measurement techniques that may impact comparability between entities and over time.

Accordingly, the Information must be read and interpreted with reference to the Guidelines, the main aspects of which are presented in this Statement.

## Limits inherent in the preparation of the Information

As indicated in the Statement of the Method of preparing the carbon assessment, the Information on CO2 equivalent emissions may be subject to uncertainty inherent to the state of scientific and economic knowledge and the quality of external data used. Some information is sensitive to the choice of methodology and the assumptions and/or estimates used for its preparation and presented in the Statement.

## Responsibility of the entity

The Executive Board is responsible for:

- selecting or establishing appropriate criteria for the preparation of the Information;
- 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, as well as the information set-out in Article 8 of Regulation (EU) 2020/852 (Green Taxonomy).
- implementing the internal controls it deems necessary to enable the preparation of Information that is free from material misstatement, whether due to fraud or error.

The Statement was prepared in accordance with the Group Guidelines as referred to above.

## Responsibility of the independent third party

On the basis of our work, our responsibility is to provide a reasoned opinion expressing a moderate 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 historical information (observed or extrapolated) provided pursuant to Article R. 225-105 I, paragraph 3 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.

As it is our responsibility to issue an independent conclusion on the Information prepared by Management, we are not authorised to participate in the preparation of the Information, as this could compromise our independence.

It is not our responsibility to comment on:

- the entity's compliance with other applicable legal and regulatory provisions (in particular the information required by Article 8 of Regulation (EU) 2020/852 (Green Taxonomy), the French duty of care law and anti-corruption and tax evasion legislation);
- the fairness of the information required by Article 8 of Regulation (EU) 2020/852 (Green Taxonomy);
- the compliance of products and services with the applicable regulations.

## Applicable regulatory provisions and professional guidance

Our procedures described below were performed in accordance with the provisions of Articles A. 225-4 et seq. of the French Commercial Code, the professional guidance issued by the French Institute of Statutory Auditors (Compagnie Nationale des Commissaires aux Comptes, CNCC) relating to this engagement in lieu of an audit programme and ISAE 3000 (revised).

## Independence and quality control

Our independence is defined by the provisions of Article L. 822-11 of the French Commercial Code and the French Code of ethics for statutory auditors. In addition, we have implemented a system of quality control including documented policies and procedures aimed at ensuring compliance with applicable legal and regulatory texts, ethical rules and professional guidance issued by the French Institute of Statutory Auditors relating to this engagement.

## Means and resources

Our work was carried out by a team of three people between 25 October 2022 and 15 March 2023 and took a total of 5 days/person.

We were assisted in our work by our specialists in sustainable development and corporate social responsibility. We conducted five interviews with people responsible for preparing the Statement, mainly representing Executive Management, administration and finance, risk management, compliance, human resources and the environment.

## Nature and scope of our procedures

We planned and performed our work taking account of the risk of significant misstatement of the Information.

We believe that the work carried out, based on our professional judgement, is sufficient to provide a basis for our moderate assurance conclusion:

- we obtained an understanding of the activities of all the companies included in the consolidated scope and the description of the main risks;
- 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;
- we verified that the Statement provides the information required under Article R. 225-105 II of the French Commercial Code, where relevant with respect to the main risks, and includes, where applicable, an explanation for the absence of the information required under Article L. 225-102-1 III, paragraph 2;
- we verified that the Statement presents the business model and a description of 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 relating to the main risks;
- we referred to documentary sources and conducted interviews to:
  - assess the process used to identify and confirm the main risks as well as the consistency of the outcomes, including the key performance indicators used, with respect to the main risks and the policies presented, and
  - corroborate the qualitative information (measures and outcomes) that we considered to be the most important presented in Appendix 1. For certain risks, such as anti-corruption, our procedures were conducted at consolidating entity level, while for the other risks, our procedures were conducted at consolidating entity level and on a selection of entities;
- 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, within the limitations set out in the Statement;
- we obtained an understanding of internal control and risk management procedures the entity has put in place and assessed the data collection process to ensure the completeness and fairness of the Information;
- for the key performance indicators and other quantitative outcomes that we considered to be the most important, as presented in the Appendix,
- we implemented:
  - analytical procedures consisting in verifying the proper consolidation of the data collected and the consistency of any changes in data,
  - substantive tests, by sampling or other selection methods, 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<sup>(1)</sup> and covers between 62% and 100% of the consolidated data selected for these tests;
- we assessed the overall consistency of the Statement based on our knowledge of all the companies included in the consolidated scope.

The procedures performed in a moderate assurance

engagement are less in extent than for a reasonable assurance engagement performed in accordance with the professional guidance issued by the French Institute of Statutory Auditors; a higher level of assurance would have required us to carry out more extensive procedures.

Lyon, 15 March 2023

FINEXFI  
Isabelle Lhoste

Partner

1] Societal data: Axway Software SA Group. Social data: Axway Software SA Group. Environmental data: France (Axway SAS, Axway Distribution), Romania (Axway Romania Srl), United States (Axway Inc.), Bulgaria (Axway Bulgaria EOOD), Germany (Axway GmbH)

## APPENDIX

### Quantitative information verified:

#### Societal information:

- Net Promoter score
- Gaia rating

#### Environmental information:

- Contribution to carbon neutrality by 2028 - Scopes 1 and 2
- Reported carbon footprint (absolute value) - Scopes 1 and 2
- Change in greenhouse gas emissions in T eq. CO<sub>2</sub> - France
- Change in greenhouse gas emissions in T eq. CO<sub>2</sub> - Romania
- Change in greenhouse gas emissions in T eq. CO<sub>2</sub> - USA
- Carbon footprint- Emissions (upstream scope 3)
- Number of files signed
- Number of pages signed
- Paper reams ordered (Group)
- Waste collection (in kg) (France)
- Number of Cyber Clean-Up Days organised

#### Employee information:

- Total workforce at 31 December 2022
- Workforce by geographical area
- Number of employees by age range
- Gender diversity
- Internal survey participation rate
- Employee engagement score
- Average seniority in years
- Total number of training hours
- % of e-learning
- % of women in the workforce
- Recruitment by age range
- % of employees on part-time contracts

**Qualitative information verified:**

- EcoVadis certification
- Ethics Charter
- Securities Trading Code of Conduct
- Whistle-blowing procedure
- Company Savings Plan agreement
- Mobility agreement
- Gender equality index

## 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
<b>GP1</b> (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.	12	Profile Business model
<b>GP2</b> (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)	35	Chapter 2 Risk factors
<b>GP3</b> (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). <b>Comment:</b> Axway applies a policy to all risks that affect it.		
<b>GP4</b> (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).	35	Chapter 2
<b>GP5</b> (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) <b>Comment:</b> Support for the Global Compact. Adhesion to the Middenext Code	57	
<b>GP6</b> (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).		Axway website
<b>GP7</b> (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. <b>Comment:</b> Certificate of disclosure and opinion of fairness concerning social, societal and environmental information.	101	
<b>GP7</b> (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).		

\* numéros de page correspondant au Document d'enregistrement universel 2022

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

## Axway NFPS

<b>GP8</b> (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).
<b>GP9</b> (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 (Conseil d'État), 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

<b>I.a)</b>	<b>Employment</b>	
<b>I.a) 1.1</b>	Total workforce	59
<b>I.a) 1.2</b>	Breakdown of employees by gender	59
<b>I.a) 1.3</b>	Breakdown of employees by age	59
<b>I.a) 1.4</b>	Breakdown of employees by geographic area	59
<b>I.a) 2.1</b>	Recruitment	59
<b>I.a) 2.2</b>	Redundancies	Non material
<b>I.a) 3.1</b>	Compensation	68
<b>I.a) 3.2</b>	Change in compensation	68
<b>I.b)</b>	<b>Organisation of work</b>	69
<b>I.b) 1</b>	Organisation of working time	69
<b>I.b) 2</b>	Absenteeism	70
<b>I.c)</b>	<b>Health and safety</b>	70
<b>I.c) 1</b>	Health and safety conditions at work	70
<b>I.c) 2.1</b>	Frequency and seriousness of workplace accidents	70
<b>I.c) 2.2</b>	Occupational diseases	Non material
<b>I.d)</b>	<b>Relations with employees</b>	71
<b>I.d) 1</b>	Organisation of social dialogue, in particular the procedures for informing staff, consulting and negotiating with them	71
<b>I.d) 2</b>	Review of collective agreements, particularly in the area of health and safety at work	71
<b>I.e)</b>	<b>Training</b>	65
<b>I.e) 1</b>	Training policies implemented, including environmental protection policies.	65
<b>I.e) 2</b>	Total number of training hours	65
<b>I.f)</b>	<b>Equal treatment</b>	61
<b>I.f) 1</b>	Measures taken in favour of gender equality	61
<b>I.f) 2.1</b>	Measures taken in favour of employment	63
<b>I.f) 2.2</b>	Measures taken for the integration of people with disabilities	61
<b>I.f) 3</b>	Anti-discrimination policy	61

## Environmental information

<b>II.a)</b>	General environmental policy	81
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Article 225 and Decrees of 19/08/2016 and 09/08/2017		Axway NFPS
II.a) 1.1	Organisation of the Company to take environmental issues into account	81
II.a) 1.2	Environmental evaluation or certification procedures	EcoVadis
II.a) 2	Resources dedicated to the prevention of environmental risks and pollution	Non material
II.a) 3	Provisions and guarantees for environmental risks <b>Comment:</b> Axway is not affected by this point due to its tertiary activity.	
II.b)	Pollution	Non material
II.b) 1.1	Prevention, reduction, repair measures: AIR	Non material
II.b) 1.2	Prevention, reduction, repair measures: WATER	Non material
II.b) 1.3	Prevention, reduction, repair measures: SOIL	Non material
II.b) 2	Consideration of any form of contamination specific to any activity, notably sound and light disturbances	Non material
II.c)	<b>Circular economy</b>	83
II.c).i)	Waste prevention and management	83
II.c).i) 1	Measures of prevention, recycling, reuse, other forms of waste recovery and disposal	83
II.c).i) 2	Actions in the fight against food waste <b>Comment:</b> The premises in La Defense (France) have a company restaurant committed to the fight against food waste (2).	Non material
II.c).ii)	Sustainable use of resources	
II.c).ii) 1.1	Water consumption <b>Comment:</b> Axway uses only water for sanitary purposes in its tertiary activity. The premises are equipped with efficient technology in this area.	Non material
II.c).ii) 1.2	Water supply in keeping with local constraints <b>Comment:</b> Axway does not operate in countries where the use of water is restricted.	
II.c).ii) 2.1	Raw material consumption	Non material
II.c).ii) 2.2	Measures taken to improve efficiency of use <b>Comment:</b> Axway only uses paper and office supplies for its tertiary activity.	
II.c).ii) 3.1	Energy consumption	83
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 <b>Comment:</b> Axway is not affected by this point due to its tertiary activity. Axway leases its premises and does not carry out any construction work.	Non material
II.d)	<b>Climate change</b>	83
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 <b>Comment:</b> Scope: France, Germany, Bulgaria, Romania, USA (Phoenix), Ireland	89
II.d) 2	Adaptation to the consequences of climate change	Non material
<b>Comment II.d)2:</b> 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	90

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

## Axway NFPS

II.e)	<b>Protection of biodiversity</b>	Non material
II.e) 1	Measures implemented to protect and conserve biodiversity <b>Comment:</b> Axway is not affected by this point due to its tertiary activity.	Non material

## Societal information

III.a)	<b>Societal commitments in favour of sustainable development</b>	80
III.a) 1	The impact of the Company's activity in terms of employment and local development	63
III.a) 2	The impact of the Company's activity on neighbouring or local communities <b>Comment:</b> Axway is not affected by this point due to its tertiary activity.	Non material
III.a) 3	Relationships with the Company's stakeholders and the methods of dialogue with them	55
III.a) 4	Partnership and corporate patronage initiatives	74
III.b)	<b>Subcontractors and suppliers</b>	76
III.b) 1	Integration of social and environmental criteria in the purchasing policy	76
III.b) 2	Integration of social and environmental responsibilities in relations with suppliers and subcontractors	74
III.c)	Fair practices	78
III.c)	Measures taken for consumer health and safety <b>Comment:</b> 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.	Non material

## Information on the fight against corruption and tax evasion (3)

	Actions taken to prevent corruption	78
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## Information on actions in favour of human rights

V.a)	Promoting and complying with the Fundamental Conventions of the International Labour Organisation (ILO) <b>Comment:</b> Adhesion to the Global Compact	57
V.a) 1	Respecting freedom of association and the right to collective bargaining <b>Comment:</b> Axway is committed to these issues through its adhesion to the Global Compact, but does not have any operations in countries considered high risk	Non material
V.a) 2	Elimination of employment and professional discrimination <b>Comment:</b> 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) 3	Elimination of forced or compulsory labour <b>Comment:</b> 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) 4	Effective abolition of child labour <b>Comment:</b> 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.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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