

Code of Ethics

November 2025

FOREWORD

Dear colleagues,

idverde's core mission is to create and care for green spaces that enrich people and the planet.

As a leader in our sector, we have a responsibility to ensure that our performance contributes to long-term progress, building climate-resilient solutions that enhance our environments and support thriving communities.

We, the employees of idverde, are the Group's most valuable resource and the primary actors in this ambition.

However, our mission can only be achieved through ethical commitments that guarantee the quality of our work and the integrity of our performance.

To support us, this Code of Ethics defines the values and fundamental principles of our Group. These must guide our individual and collective actions in carrying out our common purpose.

It is a top priority for me that these principles are implemented, and I will ensure they are always respected.

François GILBART

Group CEO

IDVERDE'S PRINCIPLES AND VALUES

The Group has defined a set of values that we hold dear and that must continually inspire our behaviours and actions:

Committing to a positive impact

Every action taken by *i*dverde and its employees reflects our commitment to ethics, social responsibility and respect for the environment. They are the foundations of our success. Quality is everyone's goal, in all areas and at every level. It results from competence, teamwork, professionalism, and a sense of responsibility.

Being creative and innovate

This strength is a key driver of *i*dverde's development. It stems from the expertise and creativity of all employees and their ability to adapt, progress and tackle the social and environmental challenges facing us, whether through mastering new tools, providing solutions to increasingly complex environmental issues, and becoming a strategic partner for our clients.

Working together

*i*dverde's dynamism is rooted in the commitment of each employee to cultivate a strong team spirit and an inclusive environment, one that fosters mutual support, empathy, recognition, tolerance, kindness, trust, and transparent, constructive communication. Sharing our expertise and experience is fundamental. Effective information flow and efficient use of our resources enable all of us to be agile and responsive.

IMPLEMENTATION OF THIS CODE OF ETHICS

This Code applies to all employees and aims to ensure the *i*dverde's development in line with our values that form its DNA.

The rules set out here do not replace national or international laws and regulations, nor fundamental human rights and International Labour Organisation conventions, all of which idverde fully respects.

*i*dverde strictly prohibits all forms of human trafficking, forced or compulsory labour (including modern slavery), and child labour. It is committed to fair working conditions, respect for workers' rights and equal treatment and opportunities throughout its operations and supply chain.

Each employee is responsible for acting in accordance with the principles of this Code of Ethics in all circumstances, whatever their duties, level of responsibility, and relationships.

This Code also enables our customers, business partners and, all external stakeholders to better understand *i*dverde's ethical standards.

Managers must lead by example, embodying these principles and fostering a culture of trust and integrity within idverde.

This Code provides a framework by cannot regulate every situation. Each individual must give it full meaning by applying it in good faith.

It is supplemented by guidelines and codes of conduct within each country business unit, which provide concrete applications of this ethical charter and specify *i*dverde's commitments by area or professional practice.

In case of doubt or if further information is needed, employees are encouraged to consult the relevant department in their business unit for advice.

This Code of Ethics is publicly available on our website www.idverde.com

We are all responsible for ensuring that this Code is upheld. To support this commitment, idverde provides a confidential and secure whistleblowing system allowing stakeholders to report any suspected breaches. The procedures and conditions for its use are detailed in our Whistleblowing Charter.

IN OUR RELATIONS WITHIN IDVERDE

Employees

Each employee's activities must comply with local regulations, which all employees are required to know and follow.

*id*verde places the health and safety of its employees among its highest priorities and is committed to informing and training them in these topics daily.

*i*dverde is committed to maintaining good working environments based on respect, consideration and discretion. It condemns all forms of physical, mental, or sexual harassment and rejects any practice of excessive pressure or intimidation.

Across all its business units, *i*dverde promotes professional equality, diversity, and the right to work for all, focusing its social policy on skills and performance. *i*dverde does not permit any form of discrimination.

*i*dverde respects the right of all employees to freedom of association and collective bargaining. Employees are free to form or join work councils and/or trade unions of their choice without fear of reprisal or discrimination. *i*dverde is committed to high-quality social dialogue throughout the organisation and to constructive engagement with employee representatives in a spirit of mutual respect and cooperation.

All employees have the right to privacy and to disconnect from work.

idverde is committed to respecting and protecting the personal data of all stakeholders. idverde only collects and retains data necessary for its activities.

Finally, idverde promotes responsible and transparent communication. Employee must not share non-public information whose disclosure could harm the interests of idverde or its partners, and must act fairly and discreetly, particularly when communicating on social networks or media.

Country Business Units

The Group ensures that relations within its country business units are cohesive and transparent to achieve its objectives.

The Group defines corporate rules that form a common foundation and describe its standards. Each country business unit, in coordination with the Group, implements local measures to comply with these standards, integrating local specificities where needed.

The Group ensures that its business units share accurate, objective and timely information and contribute effectively to the consolidation of the Group data.

Each business unit promotes open communication with employees to foster engagement, relaying the Group's strategic orientations and priorities while also providing opportunities for employees to express their needs and perspectives.

IN OUR COMMERCIAL RELATIONS

idverde is committed to acting ethically, professionally, and with integrity in all its relationships with stakeholders across its market and professional sectors. idverde takes all necessary measures to prevent, detect, and address corruption, influence peddling, or anti-competitive behaviour. To support this, idverde has adopted Integrity Guidelines applicable to all employees, supported by a Groupwide compliance programme.

Our clients

One of *i*dverde's priorities is to meet the needs of its clients and provide them with solutions to current challenges.

*i*dverde strives for excellence in quality, added value, service and innovation, to become a strategic partner for its clients.

This means:

- being attentive to customers' requirements and expectations to provide clear, comprehensive and accurate proposals,
- > ensuring that products and services provided are of the highest quality,
- > providing impeccable follow-up and support throughout contract execution,
- responding promptly and effectively to client complaints and proactively advising on any identified risks, regardless their nature and cause, and
- > operating within a transparent legal and regulatory environment understood and respected by all, wherever the Group operates.

These commitments require open dialogue based on accurate and sincere information, transparency of the Group's procedures, and full compliance with its commitments, as well as with competition and business ethics rules.

Our suppliers and partners

The quality of *i*dverde's products and services also depends on its ability to secure excellent performance from its suppliers and partners.

*i*dverde selects them based on objective criteria of quality, performance, cost and suitability for its needs, within a framework of mutual trust.

These quality criteria include adherence to ethical, environmental, social and labour standards aligned with the Group's policies. These expectations are detailed in our Supplier Code of Conduct.

The selection of suppliers and partners must be free from favouritism or discrimination, and follow the procedures defined by each country business units.

Employees involved in these processes must demonstrate impeccable ethics, avoid any conflict of interest and comply with competition and business ethics regulations.

*i*dverde is committed to protecting the confidential information of its suppliers and partners as carefully as it protects its own.

Our competitors

idverde ensures compliance with competition rules to maintain fair and equitable competition in all countries where it operates. No action by idverde should prevent, restrict, or distort competition.

*i*dverde rejects all unfair commercial practices, particularly any agreements with competitors or any concerted practices regarding prices, financial terms, market sharing, or client allocation.

When idverde collaborates with competitors, the parties must clearly define the scope of the information exchanged and ensure that no strategic data is shared in a way that provides unfair advantage.

Any consortium or joint venture evolving a Group entity must comply fully with applicable competition laws.

In case of doubt, employees should refer to the Integrity Guidelines or consult their legal department.

WITH RESPECT TO OUR ENVIRONMENT

The environment, its protection, and sustainable development are at the heart of our business. These principles are embedded in *i*dverde's strategy, which defines clear environmental actions and objectives.

Our organisation

Recognising that responsibility exists at every level, idverde seeks to reduce its environmental footprint across daily activities.

idverde promotes eco-friendly habits by sharing best practices and raising employee awareness throughout the organisation.

Employees are encouraged to avoid waste or to use resources responsibly.

Our society

idverde promotes environmental protection through the activities, which contribute to the development of nature-based solutions. Deeply rooted in local communities, idverde is committed to supporting the local social and economic fabric.

*i*dverde ensures that it always complies with all applicable environmental standards and legislation and encourages its partners to adopt an approach focused on continuous environmental performance improvement.

The planet

As a responsible organisation, the Group links its performance to generating a positive social, societal and environmental impact. It has defined clear environmental commitments aimed at reducing its carbon footprint, preserving and restoring biodiversity, and optimising waste and materials by promoting the circular economy.

*i*dverde is dedicated to developing and offering its clients more sustainable solutions capable of addressing the growing ecological challenges of climate change adaptation and biodiversity loss.

If you witness, or have reason to believe, that an act or an attempted breach of idverde's rules set out in this Code of Ethics has occurred, you are encouraged to report it without delay and in good faith. A confidential system for receiving and handling reports is available to you via our platform: https://idverde.integrityline.com

idverde 21 rue Glesener L1631 Luxembourg