



Code of  
**Business Conduct**

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## Pomelo Sustainability

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Monday to Friday from 9:15 am to 6 pm

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# 1. Word of the Founders

*We believe:*

*That working **together** leads to a successful **project**.*

*That a **project** requires appropriate **support**.*

*That proper support requires **experts**.*

*That this expertise be developed using a **suitable tool**.*

*That a suitable tool is a **collaborative tool**.*

*That collaborating is the best way of working **together**.*



*Antoine Fournier, CEO  
Jérémie Laudet, Managing Director*

## 2. Our Company

Pomelo-Paradigm designs and markets the Pomdoc DM solution (launched in 2017, with approximately 120 clients in 2025). We also offer packages to support our clients in preparing their regulatory reports (URD, annual and quarterly reports, sustainability reports, statutory accounts, meeting notices, etc.). Clients can also be supported by approved partners within our ecosystem (communication agencies, financial consolidation solutions, integrators, ESG data platforms, etc.).

Our main customers are listed companies in France and Europe, as well as banks and investment fund managers.

### Our Mission

Preparing financial and regulatory reports is perceived as a tedious and stressful task. It deals with subjects and issues of considerable importance to the issuing company.

*We offer technological and business solutions to put people at the core of the document creation process.*

### Our Collaborative Approach

Employee well-being has always been a priority for us, and is at the heart of our CSR approach. This respectful approach is also essential in our relations with all our stakeholders (customers, suppliers, business partners, etc.) We therefore apply a collective intelligence approach to our work, both internally and with all our partners, as in the case of the software we develop - collaboration with our customers, suppliers and partners.

*We are well aware of the complexity and technicalities involved in preparing regulatory reports, of the stakes they represent for companies, and of the importance of adapting to our customers' practices. We are therefore convinced that it is essential to draw on everyone's skills and to work collaboratively at all levels.*

## 3. Our Commitments

We are committed to all our stakeholders to conduct our business in a way that respects human rights, business ethics and the environment, and ensures the confidentiality and security of information. These requirements are also reflected in our *Responsible Purchasing Policy*.

### Respecting Human Rights

In accordance with the laws and regulations in force relating to the rights of individuals and workers, Pomelo-Paradigm is committed to:

- Respecting working hours and the right to disconnect,
- Respecting wage laws,
- Providing a safe and healthy working environment,
- Not tolerating any form of harassment or discrimination,
- Not using modern slavery or child labour.

### Business Ethics

In order to establish lasting commitments based on mutual trust with all our stakeholders, Pomelo-Paradigm naturally applies the principles of business ethics:

- Prohibition of corruption and bribery - specified in our *Anti-Bribery Policy*,
- Background checks on own staff, Protection of property, confidential information and privacy,
- Prohibition of conflicts of interest and unfair commercial practices,
- Respect for customers and all stakeholders, even in the event of disagreement or dispute.

### Confidentiality And Information Security

As the publisher of software designed to produce regulatory reports, ensuring the confidentiality and security of information is at the heart of our business. With ISO 27001 certification, Pomelo-Paradigm is committed to:

- Implementing technological measures to guarantee the security and integrity of information,
- Training our teams in information security and the RGPD, and raising awareness among our stakeholders,
- Respecting confidentiality and industrial property,
- Protecting the data of our employees, customers and business partners.

### Our Carbon Contribution Strategy

To meet the environmental challenges of today and tomorrow, we encourage our employees to adopt eco-responsible behaviour through awareness-raising initiatives, training and equipment to reduce our waste and emissions.

As digital technology is our second biggest source of greenhouse gas emissions, we choose suppliers who are ISO27001 certified and who use renewable energy. We also encourage everyone to use digital technology sensibly, in particular through our *Digital Responsibility Charter*.

Since 2023, we have been committed to a carbon contribution trajectory by investing in carbon offsetting projects for all our incompressible emissions.

## 4. Your Commitments

Since our creation in 2013, we have been committed to building a virtuous ecosystem based on long-term relationships with all our stakeholders (employees, business partners, customers and suppliers).

If you have this document in front of you, you are certainly one of those valuable stakeholders. This *Code of Business Conduct* is therefore intended for you.

By signing this document, you agree to abide by the principles set out in this *Code of Business Conduct*.

Name of entity: .....

Name of signatory: .....

Date: .....

Signature: .....

Design and Production



[pomelo-paradigm.com](http://pomelo-paradigm.com)



Collaborative platform for the production  
of your regulatory documents

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