POMELO
PARADIGM

Digital Responsibility
Charter

POMELO PARADIGM

Pomelo Sustainability

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Monday to Friday, from 9.15 am to 6 pm

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1. Context

Environmental impacts of digital technology

Digital activities currently account for 3 to 4% of global greenhouse gas emissions and 4% of France's carbon footprint (16% more than in 2020).

Given that 80% of these emissions come from equipment manufacturing and that 11% of French electricity consumption is linked to digital technology, the lifespan and proper use of equipment should be central concerns in our digital choices and practices.

Social impacts of digital technology

Just as with environmental impacts, the risks of social impacts are present throughout the entire production chain—from subcontractors to employees and consumers.

In this chain, the manufacturing of smartphones, screens, and computers requires the extraction of rare metals. However, this step is not always carried out with respect for human rights (forced evictions, child labor, failure to comply with safety standards or minimum social requirements, etc.).

The company, for its part, is required to train its employees on the various necessary tools and also to respect their employees' right to disconnect (Article L2242-17 of the French Labor Code).

Role of Pomelo-Paradigm

As Pomelo-Paradigm handles inherently confidential data, respecting the security of this information is paramount (as evidenced in particular by our ISO/IEC 27001 certification).

In light of this context and faced with the explosion of the environmental and social impact of digital technology with the development of Artificial Intelligence (it is estimated that emissions in the digital sector will triple by 2050), our approach to responsible digital practices is taking shape at several levels, from the choice of hosting providers to the daily practices of employees.

2. Hosting

When searching for hosting providers, we consider the following criteria:

- Energy efficiency improvement initiatives (ISO 50001 standard),
- Use of eco-friendly equipment,
- ISO/IEC 27001 certification,
- Location in France.

To date, the selected hosting providers are OVH and Scaleway — see Appendix.

3. Software development

Code simplification

A clean, easy-to-read code

We encourage our developers to write clean, readable and maintainable code. A well-organised codebase is more efficient, easier to maintain and requires fewer resources to run.

Redundancy reduction

We promote the reduction of redundancies in source code, which not only improves performance but also reduces the size of applications, thereby minimising resource consumption.

Algorithm optimisation

We encourage our developers to optimise algorithms to reduce the workload on processors, thereby improving the energy efficiency of applications.

A light interface

Streamlined UX/UI design

Our aim is to provide a fluid user experience (UX) and an intuitive user interface (UI) while minimising resource consumption. A lightweight interface contributes to more efficient use of IT equipment.

Minimised visual effects

We avoid excessive visual effects and superfluous animations that can overload system resources and increase energy consumption.

Use of documentation systems

Lightweight file integration

We encourage our users to integrate lightweight files, particularly images, into documents stored on Pomdoc DM (or any other document system used). This reduces the size of the files and facilitates their transmission, which contributes to a reduction in bandwidth and energy consumption when sharing and consulting documents.

Training and awareness

We will train our users on how to create and integrate lightweight files into their documents. Raising awareness of the environmental impact of digital file sizes is essential to maximise the effectiveness of this policy.

Continuous assessment: monitoring and improvement

We regularly monitor the impact of these measures on performance, energy efficiency and user satisfaction. We will adjust our approach based on the results obtained to continue to reduce our environmental footprint while meeting the needs of our users.

By adopting these principles of code simplification, lightweight interface and lightweight file integration, we are actively contributing to reducing our environmental footprint while offering high-performance, user-friendly software solutions. Our commitment to eco-design and the efficient management of digital resources is an essential step in our drive towards a responsible digital policy that respects the environment.

4. Responsible purchasing

In line with our *Responsible Purchasing Policy*, we have determined specific criteria for digital products based on two major axes: high repairability & low consumption.

Priority to sustainability and reparability

We are committed to purchasing IT equipment that is designed to be durable and repairable. This means that we select equipment that can be kept for a long time and whose components are, if possible, easily accessible and replaceable. The aim is to extend the life of our equipment and reduce the amount of electronic waste.

Duration of computer use

We establish a minimum useful life for the computers we acquire, ensuring that it is in line with the operational needs of our organisation. This minimum useful life will be determined taking into account the performance, repairability and energy efficiency of the equipment.

Criteria for selection

When acquiring new equipment, we take the following criteria into account:

- **Estimated lifespan:** we prefer equipment with a long estimated lifespan, avoiding as far as possible any form of programmed obsolescence.
- **Ease of dismantling:** we prefer equipment that can be dismantled without the use of special tools and whose internal components are clearly identified or whose repair service is available.
- **Availability of spare parts:** we choose suppliers who guarantee the availability of spare parts over an extended period, making repairs easier.
- **Parts compatibility:** we look for equipment whose spare parts are compatible with several generations of products, thus reducing waste.

Optimising server use

We are implementing strategies to optimise the use of our servers, including consolidating workloads, virtualising resources where appropriate and using energy-efficient technologies to reduce data centre energy consumption.

Circular economy and disposal management

We take a responsible approach to managing the disposal of our IT equipment, in accordance with our *Disposal Policy*. This includes implementing appropriate processes for recycling or reselling obsolete equipment. We ensure that obsolete equipment is disposed of in an environmentally sound manner and in compliance with applicable regulations.

Reducing energy consumption

We are committed to minimising the energy consumption of our IT equipment by adopting the following measures:

- **Selecting energy-efficient equipment:** we prefer equipment that carries energy efficiency labels, such as Energy Star, and uses low-energy technologies.
- **Power management:** we configure our devices to optimise power management, using strategies such as automatic standby when not in use. We also encourage equipment to be switched off in the evening and at weekends when not in use.
- **Software upgrades:** we ensure that our systems and software are kept up to date to take advantage of energy efficiency improvements.

Training and awareness

We train our staff in the importance of responsible purchasing of materials and the energy-efficient use of equipment. Employee awareness is essential to maximise the effectiveness of this policy.

Continuous assessment

We periodically review our responsible hardware purchasing policy to ensure that it is aligned with the latest technological advances and best practice in sustainability.

By adopting these principles of responsible hardware purchasing, we are actively contributing to reducing our environmental footprint while ensuring the economically efficient management of our IT resources. Our commitment to repairability and energy efficiency is an essential step towards a responsible and environmentally-friendly digital policy.

5. Good use of equipment

Digital hygiene

We promote responsible digital hygiene by encouraging good practice in data management and security. This includes securing sensitive data, protecting against malware and raising awareness of cyber security.

Cost-effective use of IT resources

We encourage our employees to use IT resources economically by switching off computers, monitors and peripherals when not in use, avoiding unnecessary downloads, and using energy-efficient software and applications.

Right to disconnect

Introduced into the *French Labor Code* in 2019, the right to disconnect has always been applied at Pomelo-Paradigm.

Except in exceptional and clearly defined cases (occasional on-call duty or overtime during periods of high workload), employees will not be required to work or bring their computer equipment to work in the evenings, on weekends, or during holidays.

Printers and paper

Reducing consumption

We are committed to reducing paper consumption and unnecessary printing by encouraging the use of digital alternatives. This includes promoting the digitisation of documents and implementing paperless working practices wherever possible.

Eco-friendly printers

When printing is necessary, we will give preference to the use of energy-efficient and certified environmentally-friendly printers. We configure these printers to use ink or toner economically, to use black and white by default and to use double-sided printing. Finally, we recycle empty cartridges appropriately.

Raising employee awareness

We make our staff aware of the importance of sensible print consumption and the environmental impact of excessive printing. Awareness-raising and training campaigns are put in place to encourage more sustainable working habits. A notice board is also placed next to each printer to remind people of these rules.

Assessment and continuous improvement

We will regularly evaluate our sensible print and digital hygiene policy to ensure that it is effective and in line with our environmental objectives. We will continually seek ways to improve our practices.

6. Information confidentiality and security

As a software publisher specializing in regulatory reporting, ensuring the confidentiality and security of information is central to our business. Certified ISO/IEC 27001, Pomelo-Paradigm is committed to:

- Implement technological measures to guarantee the security, confidentiality, integrity, and availability of information;
- train our teams in information security and the GDPR (General Data Protection Regulation), and raise awareness among our stakeholders;
- respect confidentiality and intellectual property;
- protect the data of our employees, customers, and business partners;
- and conduct regular monitoring to maintain our level of knowledge and security in line with the current threat landscape.

Information System Security Policy

Our Information Security Policy (ISSP) and Pomelo-Paradigm's security culture are built around four complementary and interdependent pillars: organization, people, physical security, and technological security.

Each of these pillars outlines the actions implemented within Pomelo-Paradigm's Information Security Management System (ISMS) to ensure the security of its information system.

The information security incident rate is a strategic indicator used within our ISMS. Our action plans aim to maintain this indicator at zero.

Audits and certification

Our ISO/IEC 27001 certification demonstrates that we have implemented an effective Information Security Management System (ISMS) to protect against cyber threats, manage the risks associated with an organization's critical information, and implement appropriate safeguards to ensure the confidentiality, availability, and integrity of that information.

We undergo annual audits for this certification, in addition to periodic penetration testing, always with a focus on transparency and continuous improvement.

Stakeholder awareness

As part of their onboarding, all our employees complete the GDPR MOOC offered by the CNIL (French Data Protection Authority)[1], as well as the one offered by the Ministry of the Interior[2], in addition to the awareness workshop on the IT Charter, led by our Information Systems Security Manager.

Due to the nature of our business, we also raise awareness among our clients and partners about the size of files hosted via Pomdoc DM and transmitted by email.

1 *"L'Atelier RGPD": https://www.cnil.fr/fr/comprendre-le-rgpd/le-mooc-de-la-cnil*
2 *"Formation Sens Cyber de Cybermalveillance": https://www.cybermalveillance.gouv.fr/sens-cyber/apprendre*

7. Appendix - Current hosts

OVH

source : https://corporate.ovhcloud.com/en-gb/sustainability/environment/

OVH are SecNumCloud certified.[1] 100% of the servers are recycled and the use of refurbished components enables them to extend their lifespan by an average of 4.5 years (and up to 9 years). In addition, 24 of their 33 data centres are refurbished buildings.

OVH also participates in the European Code of Conduct for Energy Efficiency in Data Centres.

OVH server performance in 2025:

Certifications	PUE[2]	WUE[3]	CUE[4]	REF[5]	Reused components
ISO50001 ISO27001 ISO27017 ISO27018	1,24	0,34 L/kWh IT	0,13 T CO2e/MWh	100%	17%

Scaleway

source : https://www.scaleway.com/en/environmental-leadership/

Scaleway are Tier III certified.[6] Since 2017, their data centers have been powered by 100% renewable energy. The company states that it reuses and recycles 100% of its IT components.

Several Scaleway services adhere to the SWIPO code of conduct for Infrastructure as a Service (IaaS).

Pomelo-Paradigm's data is hosted specifically on the DC2 and DC5 servers.

Scaleway datacenter performance in 2024:

Datacenter	Certifications	PUE[1]	WUE[2]	Energy source	Cooling system
DC2 PAR1 Paris	ISO27001 ISO50001 HDS 1	1,45	0,009	100% wind or hydroelectric Guarantee of origin (GO)	Chilled water system
DC5 PAR2 Paris	ISO27001 ISO50001 HDS 1	1,25	0,25		Direct free cooling with adiabatic cooling

1 Official label attesting to the level of trust and security of French cloud infrastructures.
2 PUE: Power Usage Effectiveness
3 WUE: Water Usage Effectivness
4 CUE: Carbon Usage Effectivness
5 REF: Renewable Energy Factor
6 Label guaranteeing a high availability rate and measures against breakdowns, overheating, etc.

Design and Production

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