



# Responsible Purchasing Policy

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## Pomelo Sustainability

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Monday to Friday, from 9.15 am to 6 pm

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# Table of contents

<b>1</b>	<b>About us</b>	<b>4</b>
1.1	Word of the founders	4
1.2	Legal framework	4
1.3	Business	4
1.4	Our Raison d'être	4
<b>2</b>	<b>Supplier selection</b>	<b>5</b>
2.1	Environmental criteria	5
2.2	Social criteria	5
2.3	Governance criteria	5
2.4	Digital technology, confidentiality and information security	6

# 1. About us

## 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, President  
Jérémie Laudet, General Manager*



## Legal framework

Pomelo-Paradigm is a SAS (simplified joint stock company) created in 2013 by Antoine Fournier and Jérémie Laudet, which comes under the collective agreement for the personnel of technical consultancies, engineering consultancies and consultancy firms.

## Business

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.

Based in Versailles, France and with a new branch in Nantes, the company had 53 employees as of December 31, 2025.

## Our *Raison d'être*

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

## 2. Supplier selection

In order to respect the commitments made to our internal and external stakeholders, we are progressively integrating various ESG criteria into the selection of our partners and suppliers:

- **Environmental criteria:** Wherever possible, we choose products and services designed and manufactured to minimize their environmental footprint.
- **Social criteria:** Respect for human rights is essential.
- **Governance criteria:** We adopt ethical and transparent practices, based on mutual respect, and combat corruption. Confidentiality and information security are also prerequisites in all our supplier selections.

### Environmental criteria

Pomelo-Paradigm invites its stakeholders to adopt eco-responsible behaviours in their daily lives. Their involvement is essential to support our continuous improvement process and our carbon contribution strategy. To this end, we:

- Implement awareness campaigns for our employees and provide them with equipment to reduce our waste and emissions;
- Integrate these criteria into our supplier selection process.

### Social criteria

In accordance with applicable laws and regulations relating to the rights of individuals and workers, Pomelo-Paradigm commits to:

- Respect working hours and the right to disconnect,
- Respect wage laws,
- Provide a safe and healthy working environment,
- Do not tolerate any form of harassment or discrimination,
- Do not resort to modern slavery or child labour.

### Governance criteria

#### Business ethics

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

- Prohibition of corruption and bribery — as specified in our *Anti-Corruption Policy*,
- Background checks for our own staff and anti-corruption training,
- Protection of assets, confidential information, and privacy,
- Prohibition of conflicts of interest and unfair business practices,
- Respect for clients and all stakeholders, even in the event of disagreement or dispute.

### Anti-corruption efforts

Committing an act of corruption or influence peddling is a serious and illegal act that can have very serious consequences for the person or entity committing it. In light of this, and in accordance with Article 17 of the French law of December 9, 2016, known as the "Sapin II" law, we have therefore implemented an Anti-Corruption Policy that applies to all our stakeholders, both internal and external. This policy specifically addresses:

- Gifts and invitations;
- Facilitation payments;
- Recruitment;
- Intermediaries and business partners; lobbying;
- Donations, patronage, and sponsorship;
- Funding or contributions to political activities;
- Maintenance and accuracy of books and records.

In the event of a violation, the employee will be subject to disciplinary sanctions which may include termination of their employment contract, as well as personal criminal and/or civil proceedings.

## Digital technology, confidentiality and information security

### Responsible digital technology

Digital technology is our second-largest source of carbon emissions (23%)<sup>1</sup>. That's why we've drafted a *Digital Responsibility Charter* in which we commit to:

- Choose ISO 50001 certified hosting providers using eco-friendly equipment, located in France;
- Optimize the use of our servers; simplify our code and design lightweight interfaces;
- Consider the lifespan and reparability of purchased equipment; respect our *Disposal Policy*.

### Information confidentiality and security

As a software provider specializing in regulatory reporting, ensuring information confidentiality and security is central to our business. ISO 27001 certified, Pomelo-Paradigm is committed to:

- Implementing technological measures to guarantee information security and integrity,
- Training our teams in information security and GDPR compliance, and raising awareness among our stakeholders,
- Respecting confidentiality and intellectual property rights,
- Protecting the data of our employees, clients, and business partners.

<sup>1</sup> According to our 2022 Carbon Footprint Assessment: <https://greenly.earth/fr-fr/case-study/pomelo-paradigm>

Design and Production



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



Collaborative platform for the production  
of your regulatory documents

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