

A WORD FROM OCTAVE

When I founded OVH in 1999, I wanted to build a different kind of company. A company in which everyone is free to express their talents to boost innovation and benefit our customers.

This mindset is at the heart of the company, and integral to our organisation. The OVH mindset is more than just a set of values. It lies within a particular ethical framework that guides both our internal interactions, and our external relationships.

Today, I am proud to present to you our Code of Ethics, which formalises, demonstrates and reinforces our commitments in this area. This Code of Ethics applies to all OVH employees, and we must all adhere to it. Respect for one another and for the environment, questioning our place in society – these have always been part of OVH's ethics and values. Setting these out clearly is important for me, and for us all.

Kind regards,

Octave Klaba, CEO and founder of OVH



OVHcloud™ Code of Business Conduct and Ethics

Introduction

What does it mean to be an ethical business?

Ethics, at their most basic form, is how we decide whether something we do, or someone else does, is right or wrong. An ethical person is typically someone who abides by a high set of standards; who, in the face of adversity, does the “right” thing.

Similarly, an ethical business is one that behaves responsibly and makes a positive social impact through its activities in the communities it serves. A company’s organizational culture, marketing practices, hiring initiatives, data protection practices, and sustainability initiatives are all factors that speak to what values are embraced by that company and, in turn, what kind of moral posture defines its decision-making and conduct. A company that embraces values like integrity, honesty, and fairness will create Trust by baking those characteristics into all aspects of its business as it operates within the global marketplace. This is the kind of company that OVHcloud strives to be every day.

OVHcloud’s public perception as a company built upon solid ethical practices is of utmost importance to us, not only during this current phase of growth and development but ALWAYS. We want consumers to equate OVHcloud with the delivery of high quality products and services while demonstrating steadfast integrity through all business interactions. Inextricably tied up with this perception is the actions and behaviors of our employees, agents, contractors, consultants and board members.

The OVHcloud Code of Business Conduct and Ethics (the “Code”) and the applicable policies ratified by OVHcloud and referred to throughout the Code, give you a clear set of practical standards so that you feel both educated and empowered to make decisions that will impact OVHcloud’s reputation in a positive way. Neither the Code nor the aforementioned policies are in any way comprehensive; therefore, always use your best judgment when faced with a situation that may not be specifically addressed in any formal documentation.

Throughout the Code, “OVHcloud”, “we”, “our”, or “us” is used to refer to the company as a whole. “You” or “your” is used to refer the employee, agent, contractor, consultant or board member as an individual.

Why is it important?

OVH is a global company that has built a reputation for innovation, transparency, and integrity since its inception in 1999. It is paramount that OVHcloud, the US subsidiary of OVH, continue to build upon that legacy as we expand the brand into new territories, industries, and markets. Our company-wide commitment to the values and principles outlined in this Code will help us hire great people, attract customers, and increase market share within the IaaS industry.

What is the purpose of the OVHcloud Code of Business Conduct and Ethics?

The purpose of the Code is to outline those values and behaviors that we want our customers, partners, prospective employees, investors, and competitors to associate with OVHcloud. The information contained in the Code is more than just an outline of what the law is; rather, the Code and the applicable policies referenced throughout serve to help you make the right decision when faced with difficult situations and questions.

What if I have a question or need guidance?

If you have a question or need clarification on anything contained in the Code, please contact your manager. If you are not comfortable going to your manager, contact the next level of management within your business unit. Additionally, you are always free to speak with someone in the Legal team or the HR team.

What if I witness a violation of the Code?

We are committed to cultivating a culture of transparency. As such, we expect you to communicate honestly and openly with your manager and others in leadership positions and to raise concerns in good faith. If you feel that a violation of this Code has been committed, please report the alleged violation to your manager, the Legal team, or submit an anonymous complaint through the OVHcloud Whistleblower Hotline. Your concern will be taken seriously and appropriate action will be taken, if necessary.

All communications will be kept confidential with no threat of retaliation. If you believe you are being retaliated against, please contact the Legal team.

What if I violate the Code?

Violation of the Code and any of the applicable policies will subject you to disciplinary action, up to and including immediate termination of your employment. Moreover, anyone who condones or ignores potential violations of the Code or the applicable policies will be subject to appropriate disciplinary action, up to and including immediate termination.

Who should follow the Code?

We expect all our employees, agents, contractors, consultants and board members to know and follow the Code and any applicable policies.

The Bottom Line

Collectively, we are all essential contributors to the success of OVHcloud. That success will only come if we adopt and adhere to both the letter and spirit of the Code and remain steadfast in our commitment to building a culture founded on systemic responsibility and trust.

General Ethical Standards

Obey the Law

OVHcloud is committed to full compliance with the laws, rules, and regulations of the countries in which we operate, and you are expected to do the same while performing your duties. It's particularly important to familiarize yourself with the basics of those laws, rules, and regulations that have a direct bearing on your job. In particular:

- **Anti-Corruption & Anti-Bribery Laws** – OVHcloud prohibits offering, giving, soliciting, or receiving ANY form of bribe or inducement. This includes the gifting to or solicitation of meals or entertainment with anyone with whom OVHcloud does business or from anyone who desires to do business with OVHcloud in a way that is inconsistent with OVHcloud guidelines. These actions could violate such laws such as the US Foreign Corrupt Practices Act of 1977 ("FCPA") and the UK Bribery Act 2010. When faced with a situation, always consider the specific circumstances and whether others would question your impartiality. For further guidelines, please consult the Gifts and Entertainment Policy, Anti-Corruption Policy, and the Employee Handbook.
- **Fair Competition** – We believe that consumers seek our products and services because of their quality, technical advantages, and economic value. OVHcloud wins and retains customers because we compete fairly and ethically for all business opportunities and respect our competitors and suppliers within our industry. This includes, but is not limited to, avoiding making defamatory remarks about a competitor, spreading false or misleading information, or encouraging colleagues to reveal proprietary information about a former employer to gain an advantage. You should take care to avoid any situations that could create the potential for unlawful anti-competitive conduct, including entering into any formal or informal agreements or "handshake" deals with another entity designed to isolate or negatively affect another business in the industry. Should you require additional guidance on this topic, please reach out to the Legal team.
- **Human Rights** – OVHcloud firmly believes that the rights of all individuals should be respected. We want to partner with only those vendors and partners who treat their workers with dignity, pay a fair wage based upon applicable laws, and guarantee safe working conditions. If you become aware of any third party with whom we work that engages in any practices that violate the above, please bring it to the attention of the Legal team or the HR team.

If a conflict exists between the Code and applicable federal, state, or local laws, then the applicable law governs.

Promote a Safe OVHcloud

Our most valuable asset is you. The success of OVHcloud is directly tied to you feeling empowered, confident, and proud of your role within our organization. Your safety and security

is of utmost importance. In that spirit, OVHcloud has a zero-tolerance policy towards acts or threats of violence in any form.

In order to establish OVHcloud as a leading IaaS provider in the industry, we must perform at the top of our game. Therefore, every employee must perform his or her work free from the influence and/or possession of any controlled substances. Further information can be found in the Employee Handbook.

Be Nice

We believe that OVHcloud should be an excellent place to work and that commitment starts with how we treat one another, whether it be in our local offices or interacting with our colleagues over phone and video. Collectively, we should conduct ourselves in a professional manner and treat one another with respect, fairness, and dignity. Therefore, any and all forms of harassment and discrimination are completely banned. This includes behavior, comments, jokes, slurs, email messages, social media posts, drawings, pictures, photographs, or other conduct that could create an intimidating or offensive environment. This prohibition against harassment extends to treatment of our customers, prospective employees, vendors, partners, independent contractors, and any other third-party doing business with OVHcloud.

Safeguard Our Stuff

OVHcloud gives you the tools you need to get your job done – whether it be equipment, data, intellectual property, and, at times, confidential information. It is up to you to be a good steward of those assets, whether it be by properly maintaining your computer and other electronics, taking great care when handling proprietary information, and securing your work areas.

Additionally, we are responsible for making proper and efficient use of OVHcloud's property, which includes being a good steward of OVHcloud's assets. Improperly awarding discounts and refunds when they are unwarranted, fraudulently inflating expense reports, and not speaking up when you witness an error are all example of fraud upon the company. This is incompatible with the OVHcloud mindset, because it damages our company and puts it at a disadvantage. Remember, anything provided to you should only be used to serve the interests of OVHcloud – not harm it.

For more information, please reach out to our IT team, internal security team, or consult the Employee Handbook and other applicable policies.

...And safeguard our customer's stuff too!

As a part of your job function, you may have access to personal data, which could include sensitive information that could be highly damaging if it was released. We take consumer concerns regarding how we collect, use, and retain their personal data extremely seriously and strictly adhere to our legal obligations both domestically and abroad. If you have access to any kind of consumer data, You must maintain the internal safeguards that we have installed to protect that data. For additional information about our data protection initiatives, please review the Employee Handbook and all other applicable policies, contact the Legal team, or [consult the Privacy page on our website](#).

Speak with One Voice

We love that our employees want to spread the word about OVHcloud, but we need to be careful about the message we send. Always be extremely careful about disclosing any kind of confidential information, even if to a customer, a partner, or a vendor. All communications with the press should be conducted exclusively through the marketing department – never hold yourself out as a representative of the organization. When sharing any type of information over social media, please consult the Employee Handbook or go straight to the Marketing team.

Hug a Tree

OVHcloud is an industry innovator when it comes to reducing our carbon footprint. We understand that our practices can have a drastic impact on the environment and constantly seek new ways to operate sustainably. We ask our employees to do their part by supporting friendly environmental practices, and to always comply with applicable environmental laws.

Recognize Potential Landmines

In the spirit OVHcloud's full commitment to operating transparently, you should avoid conflicts of interest, including even the appearance of a conflict, as this harms our ability to serve our customers without bias or outside influence.

Determining if a conflict of interest exists is not always an easy task. Our Employee Handbook outlines our policy as it relates to conflicts of interest in much more detail, but the simple version is "if someone were to see how I was acting, would it throw my partiality into question?" The good news is that many conflicts can be avoided or addressed if they are promptly disclosed and properly managed, so don't be afraid to speak up and ask for guidance from your manager, the Legal team or the HR team.

Another issue you may encounter while in performance of your job responsibilities is access to material non-public information about OVHcloud, our customers, industry competitors, or other third parties. It is both illegal and unethical to share this information with anyone or trade in any stock or other securities on the basis of this information, as this could constitute insider trading. If you have any concerns or questions regarding this topic, please contact the Legal team.

Key Takeaway

As we grow, develop, and thrive, this Code will help ensure that the values we embrace as a company will continued to be reflected in all our interactions. Thank you for your commitment to this critical effort and your continued investment in our culture that you have helped build.