

# CODE OF ETHICAL CONDUCT



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## PREFACE

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The growth and long-term viability of VIATEMIS are based on three common values:

**Creativity, Commitment, Performance**

The Code of Ethical Conduct sets out the principles to be implemented in order to respect these values on a daily basis.

Four principles of action are therefore essential to our success as a responsible company:

- The compliance with high standards of business integrity.
- The environmental protection.
- The respect for human rights and high standards of working conditions.
- The participation in the development of our stakeholders.

These principles of action are not exhaustive but, together with the sense of responsibility of our collaborators, they establish the essential rules of conduct and ethics applicable to all of our employees as well as to our stakeholders.

We are counting on everyone to apply these principles of action.

In addition, the Ethics Committee remains at your disposal for any question regarding the application of this Code of Ethical Conduct.

Mr Claude BONNET  
*Representative of the holding  
TEMIS SOLUTIONS GROUP,  
Ethical Manager*

Mrs Fanny DOMANSKI  
*General Director*

Mr Adrien GALLOU  
*General Director*

This Code of Ethical Conduct has the following missions:

- It presents the values that guide the actions we carry out on a daily basis.
- It sets out the principles of action and the commitments made by VIATEMIS towards our various stakeholders.
- It defines the expectations of VIATEMIS towards its employees in their daily decision-making and in their relations with other stakeholders.
- It explains the role of the Ethics Committee.
- It mentions additional resources for ethical themes.
- It defines the alert procedures of violations of these rules.

It is the reference document intended for all our managers and employees as well as all our stakeholders: customers, suppliers, industrial and commercial partners, local communities, shareholders, etc ...

It is in this context that you are responsible for reading this Code of Ethical Conduct, understanding it, complying with it, and reporting any potential breach of its content.

Any violation of this Code of Ethical Conduct may result in corrective actions and / or disciplinary sanctions and / or legal proceedings depending on the seriousness of the violation and the applicable laws and rules.

Managers must therefore in particular:

- Regularly refer to the Code of Ethical Conduct in the presence of their team members to ensure that it is understood.
- Create a climate of trust promoting dialogue in order to encourage employees to speak freely about their concerns.
- Ensure the proper application and respect of our principles of action.
- Have an exemplary conduct that embodies our values.

Our suppliers and our industrial and commercial partners are required to apply standards equivalent to ours.

The source language of this document is French. In the event of a dispute, the French version prevails over the version translated into other languages.

## OURS PRINCIPLES OF ACTION

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### PRINCIPLES GOVERNING BUSINESS RELATIONS

#### ANTI-CORRUPTION AND MONEY LAUNDERING

Prohibit all forms of corruption, extortion and fraud.

Make a commitment not to accept or give directly or indirectly gifts other than symbolic (advertising objects for example), benefits in kind or money in order to obtain or maintain a preferential treatment.

Refrain from accepting, facilitating or supporting money laundering.

#### INTELLECTUAL PROPERTY

Use the intellectual property rights of his company in strict accordance with the instructions in force within the latter.

Respect the intellectual property rights of third parties. Prohibit the downloading, copying, distribution, display or modification of copyrighted material without the consent of their owner.

#### COUNTERFEIT

Work to verify and eliminate any potential risk of counterfeiting when new products are placed on the market.

Undertake, within the limits of its financial and legal capacity, to limit or even eliminate counterfeits which are identified as significantly detrimental to its activities.

#### UNFAIR COMPETITION

Prohibit any action of unfair competition (tariff agreement, agreement on technical performance, etc.).

Undertake, within the limits of its financial and legal capacities, to limit or even eliminate the unfair competition actions which are identified as significantly detrimental to its activities.

#### CONFLICTS OF INTEREST

Use judgment to avoid, or be perceived to be, in situations that may present a conflict of interest.

The private interests of employees and partners must not influence or give an impression of influencing their judgment or their actions in the accomplishment of their missions.

#### INSIDER TRADING

Refrain from buying or selling shares or other company securities on the basis of material non-public information or « inside information ».

Inside information includes in particular:

- financial performance (results, turnover, margins, etc...),
- mergers, acquisitions or potential holdings,
- New products or services,
- Changes in the management team,
- The acquisition or loss of important customers or suppliers, etc.

Refrain from communicating inside information to a third party.

## CONFIDENTIALITY

Work to protect confidential information subject to its own management, its know-how, its intellectual property rights and more generally, strategic information.

No confidential information shall be disclosed, communicated to a third party or made available without prior authorization.

Commit to providing a few non-confidential data (financial, social, health & safety, environmental) that would be reasonably requested by its partners.

## IMPORT AND EXPORT CONTROL, ECONOMIC SANCTIONS

Undertake to respect the rules on import and export controls as well as those relating to economic sanctions, whether they are restrictive measures against a State, an organization or an individual.

## RESPONSIBLE PURCHASES

Refrain from purchasing from suppliers and partners who do not respect human rights, who carry out corruption operations, who violate ethical principles or who do not undertake to reduce the impact of their activities on the environment.

Commit to not supply radioactive materials and conflicts minerals (ie raw materials – tin, gold, tungsten, tantalum – from the Democratic Republic of the Congo and surrounding areas).

## FINANCIAL RESPONSIBILITY / RELIABILITY OF RECORDINGS

Make a commitment that the accounting and tax declarations which are transmitted to the authorities are established in accordance with the accounting and fiscal practices in force.

## POLITICAL COMMITMENT

Observe an attitude of neutrality towards the political parties, their representatives and their candidates.

## MANAGEMENT OF PERSONAL DATA

Commit to respect the legislation in force regarding the protection of personal data (GDPR) towards its stakeholders.



## ENVIRONMENTAL PRINCIPLES

### AUTHORIZED ACTIVITIES

In accordance with the national legislation in force, hold the environmental authorizations to exercise its activities with regard to the generated environmental risks.

Comply with regulatory requirements relating to environmental authorizations.

### REASONED USE OF RESOURCES (ENERGY, WATER, RAW MATERIALS, PACKAGING) / EMISSIONS OF GREENHOUSE GASES

Limit the consumption of resources (energy, water, raw materials, packaging) when designing any new product or manufacturing process.

Limit energy and water consumption by regularly analysing it.

Promote the monitoring of greenhouse gas emissions from its partners in order to reduce its indirect impacts on the environment.

### AIR QUALITY

Commit to limiting and controlling air emissions generated by the activities and energy production of his company.

Encourage travel on foot, by bicycle, by public transport, by carpooling or with “clean” vehicles (electric vehicles).

### WASTE MANAGEMENT

Limit waste generation by favouring the implementation of its recycling and recovery.

Commit to storing, collecting / transporting / recovering / dispositions of waste generated by channels which are approved for this purpose in accordance with the national legislation in force.

Promote the use of reusable resources with its partners.

### CHEMICALS MANAGEMENT

Commit to reducing the use of chemicals potentially harmful to health and the ecosystem, including the replacement of other chemicals with such substances.

Prohibit the supply of any new chemical without prior internal authorization. This authorization can only be issued after systematic analysis of the chemical safety data sheet.

Make a commitment to respect the lists of prohibited products and products with limitation of use which are listed by the national legislation in force as well as by the customer specifications.

Ensure that the latest safety data sheets are updated by the relevant suppliers in the shortest possible time.

Subject to receiving a request from its partners, undertake to declare the chemical substances to be used thanks to the International Material Data System (IMDS).



## PRINCIPLES ABOUT HUMAN RIGHTS AND WORKING CONDITIONS

### RESPECT FOR HUMAN RIGHTS

**Commit to respecting the existing human rights legislation in order to treat its employees and partners with respect and dignity.**

Promote respect for human rights among its partners.

### WORK OF CHILDREN AND MINOR WORKERS

Ban child labour.

Respect the national legislation in force concerning the work of minor employees. VIATEMIS thus undertakes not to recruit minor employees with the exception of apprentices in accordance with the national legislation concerning apprenticeship contracts. VIATEMIS also undertakes to receive minor trainees in accordance with the national legislation in force.

Make a commitment that the minor employees are not entrusted with works likely to compromise their health (physical and moral) and their safety.

### FORCED AND COMPUSORY WORK

Ban all forced and coerced labour (including the indirect work of non-voluntary prisoners).

Prohibit any financial contribution of employees to obtain their work contract, personal protective equipment (work clothes, shoes, etc.) or any other expense necessary for their workstation.

Ban all detention, confiscation and destruction of original identity documents, original work permits or original residence permits of its employees.

Refrain from recruiting an employee who does not have the necessary legal authorizations to work at the concerned workstation.

For all new employees, undertake to formalize a written employment contract (in a language which is understandable by the employee) that must be validated by both parties in accordance with the national legislation in force.

### ABSENCE OF DISCRIMINATION

Ban all forms of discrimination on the basis of personal characteristics which are protected or not by the national legislation in force (sex, race, religion, age, disability, sexual orientation, nationality, political opinion, trade union membership, social or ethnic origin, illness, pregnancy, etc.) with the company.

### HARASSMENT

Ban all forms of harassment (moral harassment, sexual harassment, physical abuse, etc.) within the company. All employees must be treated with dignity, decency and respect.

### HEALTH AND SAFETY

Commit to having a dynamic of continuous improvement of the health & safety topics with a cooperation between Management and the staff.

Commit to having an organization which allows the identification, evaluation, prioritization, reduction and even elimination of health and safety risks.

Make a commitment to display all the health and safety instructions (including evacuation instructions).

Ensure that the safety instructions and evacuation instructions are understood by all the employees.

Ensure the proper functioning of the means of escape and fire extinguishing means which must be easily accessible and in sufficient number as defined by the national legislation in force.

Commit to doing the evacuation drills which are required by the national legislation in force.

Commit to doing regular exercises related to different emergencies.

Provide the individual protection means which are adapted to the employees' workstations.

Commit to issuing the necessary authorizations for workstations with specific hygiene and safety skills (bridge operator, electrician, forklift operator, etc.).

Commit to maintaining a sufficient number of first-aid workers ("SST") and staff in charge of evacuating the company.

Undertake that the General Management is aware of all accidents at work, commuting accidents and minor accidents in order to implement appropriate corrective and preventive actions.

Make a commitment that an accident investigation is carried out systematically following an accident at work.

Undertake to make the mandatory periodic checks of the production means and infrastructures in accordance with the national legislation in force.

Make a commitment not to carry out any repressive actions against any employee who would exercise her/his right of warning and withdrawal when she/he is faced with a dangerous situation as defined by the national legislation in force.

### REMUNERATION

Remunerate employees and temporary staff for work done in accordance with the national legislation in force, the provision of a pay slip to employees being systematic.

Refrain from any deduction from the salaries of employees, except those covered by the law as an individual measure (employee contribution for a providence plan, seizure of salary, alimony, etc.) or by the application of a collective advantage (holiday vouchers, meal vouchers, etc.).



## SOCIETAL COMMITMENT

### WORKING HOURS

Undertake to respect the national legislation in force concerning the working hours of its employees and its temporary staff.

### FREEDOM OF ASSOCIATION

Undertake to respect the right of every employee to be part of an association representing the interests of employees, to organize and to negotiate individually or collectively.

Assume economic and social responsibility in the territories where the company is located.

In addition to the generated jobs and within the limits of its financial capacities, support the development of local associations.

Encourage the citizen involvement of its employees and their associative commitment.

## THE ETHICS COMMITTEE

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The Ethics Committee is made up of the Ethics Manager, Mr Claude BONNET, and the two General Directors of VIATEMIS.

The Ethics Committee is responsible for:

- Ensure the wide dissemination of the Code of Ethical Conduct and propose any modifications it deems necessary.
- Listen to and advise our employees as well as our other stakeholders on ethical issues.
- To make recommendations to management teams on ethical matters and to draw their attention to any risk of our activities being called into question for ethical reasons.
- To deal with any alert for violation of this Code of Ethical Conduct.

## COMPLEMENTARY SUPPORT

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When in doubt, it is important that you ask before you act.

For help on ethical issues, you are invited to contact the following staff:

- Your Line Manager;
- Your Human Resources Manager;
- Your representatives of the personal ;
- One member, or all members, of the Ethics Committee.

It is essential to remember that you have a responsibility **to choose to do the right thing**.

## ALERT FOR BREACH OF THE CODE OF ETHICAL CONDUCT

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Anyone who becomes aware of a violation of the rules defined in this Code of Ethical Conduct may decide to report it to the General Management of the company:

- Or by a simple alert procedure;
- Or by a reinforced alert procedure.

These two devices were designed as additional tools for freedom of expression. However, they are not intended to replace existing channels under the legislation in force.

No one can be sanctioned, dismissed or discriminated against for having testified in good faith, or for having reported acts that violate the code of ethical conduct.

The issuer of the alert involving behavior attributed to designated persons should preferably identify himself. His identity as well as the information collected will be treated confidentially.

### **SIMPLE ALERT**

Anyone who becomes aware of a violation of this Code of Ethical Conduct can refer the matter to their Line Manager or to the Human Resources Manager.

This alert can be verbal or written.

Upon receipt of this alert, the alerted staff must immediately inform the Ethics Committee in writing.

Depending on the nature and importance of the facts invoked, additional investigations may be launched.

### **REINFORCED ALERT**

This reinforced alert procedure can only be launched in situations that could seriously affect the business of the company or seriously engage its liability. The scope of reinforced alert covers the following areas in particular:

- conflicts of interest and corruption;
- fraud, embezzlement and theft;
- any serious infringement or risk of serious infringement of human rights and fundamental freedoms, the health or safety of persons as well as the environment resulting from the activities of VIATEMIS or those of its subcontractors or suppliers with who has an established commercial relationship;
- protection of personal data.

This alert is necessarily in writing and is sent by registered mail with acknowledgment of receipt to the Ethics Manager at the following address:

SAS VIATEMIS  
For the attention of Mr. Claude BONNET  
125 route de Paris  
03410 SAINT-VICTOR

The words "professional alert" must be specified on the envelope of this communication.

The processing of this enhanced alert will be carried out in accordance with the internal warning system in force within VIATEMIS.