



Ethics Charter

2024 EDITION







Message from the President

Ethics represent an essential component of our corporate culture. They are the basis of our success and long-term sustainability. An ethical company is one that inspires confidence and is respected by its employees, customers, partners and shareholders.

The Acoem Ethics Charter presents our guiding principles and defines the framework for expected behaviour within the company. It applies to all our employees and our suppliers.

The Charter provides a useful tool and support guide that will help you exercise your daily professional responsibilities.

I encourage you to read the Charter attentively, make it part of your work life and share it. I am confident that you will adhere to it and ensure that others do the same.

What we do is important.

The way we do it is just as important.

Fabien Condemine, Acoem CEO



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Values

Our ethics charter is built around our values. These three values are key to how we do business. They guide us in our decision making and actions, allowing us to maintain a sustainable and prosperous company.



INTEGRITY

The cornerstone of our ethics charter.

We act honestly and transparently, in compliance with all legislation and regulations.



BOLDNESS

The driving force of our success.

We take calculated risks, innovate and think outside the box.



ENJOYMENT

The key to achievement.

We are committed to creating a positive, stimulating work environment where everyone can flourish.



Who the code applies to

ALL ACOEM EMPLOYEES

The Charter applies to all employees, managers and corporate officers of Acoem Group entities (“the Group”) and, by extension, to intermediaries working on behalf of Group entities (“Employees”) in all countries where our entities are present.

This Charter sets out the ethical principles applicable within the Group. Each Group entity is invited to supplement these rules, by means of any instrument (including but not limited to by-laws, charters, procedures), with local rules that apply in the country where it is located.

For any questions relating to the Acoem Ethics Charter, please contact:

Group HR Director:
hrgroup@acoem.com

Group Head of Legal:
legal@acoem.com

Dedicated contact points are also indicated in certain sections of the Charter.

You can also report any event in contradiction with the principles of this Ethics Charter to the email addresses indicated herein and above or to your manager. Upon demand, your request can be processed anonymously.

ALL ACOEM INTERMEDIARIES

Other key resources:

It is the responsibility of each Group entity’s local management* to establish, enforce and, where necessary, develop its own internal rules, in compliance with applicable legislation, while remaining true to the principles of this Charter.

Local management of each entity is responsible for determining the rules that apply to:

- occupational health
- safety at work
- disciplinary processes
- environmental protection

It is the responsibility for each Acoem entity to ensure there are policies and processes in place that reflect regional business and regulatory frameworks. This includes but, is not limited to :

- Personal Data Management
- Anti-harassment measures
- Confidentiality obligations in the workplace, etc.

These documents must be accessible to all entity employees and reviewed annually to ensure they are up to date of any changes within the frameworks.

*Local management: Depending on the subsidiary, the local organisation and the subject matter, this may include the Country Operating Officer, the Managing Director, the HR Manager, the Quality Manager, the CFO, etc.

Social Principles

RESPECT FOR FUNDAMENTAL RIGHTS AND HUMAN RIGHTS

We are committed to respecting international human rights standards and principles (notably the Universal Declaration of Human Rights, the International Bill of Human Rights, the fundamental conventions of the International Labour Organization (ILO), the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights, etc.).

Forced labour

We prohibit any use of forced labour, servitude or slavery, as well as any abusive or illegal procedures, such as confiscating personal documents (in particular identity papers, travel documents, work permits, etc.), forcing job seekers to pay recruitment fees or post a bond when hired, etc.

You are free to leave your job at any time, subject to the notice period required by local legislation.

Child labour

We are committed to respecting the minimum age for employment in accordance with applicable national legislation. According to ILO recommendations, this age must not be lower than 15.

We also avoid hiring people under the age of 18 for work that is considered dangerous or may harm their health, safety or morals.

Illegal labor

We will never use illegal labour (off-the-books work, bogus self-employment, illegal lending or subcontracting of labour, illegal use of foreign labour, etc.). We will always comply with the legislation in force in the country where the work is being performed and, in particular, will fulfill all obligations in terms of declarations to the administrative, social and tax authorities in that country.



Harassment

You will be treated with respect and dignity.

We condemn all forms of violence in the workplace, whether in the form of aggression, sexual or moral harassment, threats, intimidation or bullying.

You can report any negative situations through your local or group-level whistleblower systems via: hrgroup@acoem.com.

Freedom of association

We are committed to respecting local laws on freedom of association, freedom of labour unions and the right to collective bargaining.

Discrimination against employee representatives, labour union members, or employees expressing their desire to belong to a labour union is never tolerated.

Working conditions

We aim to guarantee decent working conditions in compliance with applicable local legislation for all our employees.

We therefore comply with legal and collective bargaining provisions that apply to: maximum working hours, daily and weekly rest periods, breaks, overtime, etc.

We comply with applicable rules on paid leave, sick and parental leave, and minimum wage requirements where they exist, ensuring that wages are paid in accordance with established regulations in the country in question.

EMPLOYEE HEALTH AND SAFETY

Your health and safety is our number one priority.

We undertake to implement the resources and actions necessary to guarantee your health and safety and that of any other persons present on our sites (risk assessment, risk management, compliance actions, accident prevention, training, medical monitoring, etc.).

We comply with regulations and internal safety policies and procedures.

Wherever you work, we will ensure your wellbeing and good working conditions, to preserve your physical and mental health.

DIVERSITY AND EQUAL OPPORTUNITY

We view diversity as an asset that encourages creativity and mutual enrichment.

We strive to create an environment that guarantees equal opportunities for everyone.

All forms of discrimination are prohibited, both at the time of hiring and throughout the duration of the contractual employment relationship.

Decisions on hiring, promotion, training and sanctions must be based solely on objective factors (duties, skills, experience, etc.)

We are committed to promoting and developing the skills of all our employees. You are encouraged to express your career development and training aspirations during regular performance reviews.





COMMITMENTS AND RULES GOVERNING BUSINESS ETHICS

Commitments & rules governing business ethics

You are asked to report any unethical acts or behavior that you know of or suspect to your line manager. If you have any doubts or questions on this subject, please contact our General Counsel at: legal@acoem.com

CORRUPTION AND INFLUENCE PEDDLING

Bribery and influence peddling are punishable whether they are passive or active, i.e. whether or not the person initiates the bribery or influence peddling. Even an attempt is punishable.

CORRUPTION is the act by which a person vested with a specific function, whether public or private, proposes, solicits or accepts, directly or through an intermediary, a gift, an offer, an advantage of any kind or a promise with a view to performing an act which falls, directly or indirectly, within the scope of their functions, to obtain or retain a commercial or financial advantage or to influence a decision.

INFLUENCE PEDDLING is using one's position, influence or power, real or imagined, to influence a decision to be taken by a third party. Unlike corruption, influence peddling involves three players: the beneficiary, the intermediary and the target, who holds the decision-making power.



Penalties for corruption or influence peddling can be severe, not only for the employee in question but also for the Group. If an employee is convicted, the consequences can be extremely damaging for us: exclusion from public contracts, damage to our reputation, loss of confidence from customers, partners, and suppliers, etc.

We encourage you to be vigilant, in particular by reporting any suspicion of corruption or influence peddling, to provide employees with appropriate channels of communication, to investigate cases of suspected corruption or influence peddling, to assist the police and other competent authorities in any resulting prosecutions and to take all disciplinary measures against any employees involved.

In addition to the payment of a bribe, there are many other situations that can constitute an act of corruption or influence peddling. These situations call for particular caution. These include the following:



Gifts and hospitality

Gifts and hospitality, whether received or given, can be signs of courtesy that contribute to good business relations.

However, gifts and hospitality can be seen as a means of influencing a decision or favouring a company or individual.



In all circumstances, it is essential to:

- act with transparency and integrity
- check that gifts and hospitality received or given comply with current laws and regulations
- ensure they are not made in order to obtain or give any consideration or undue advantage
- ensure they do not generate a conflict of interest
- ascertain that they are strictly professional

GIFTS OR HOSPITALITY may, depending on the applicable laws, take various forms: invitations to events, business meals, entertainment, etc. They may be offered or received by a Group entity or an employee.



- declare to a superior any gift or hospitality received or given, specifying the identity of the sender, the nature, the amount, and the date
- adhere to the principles of moderation and proportionality:
 - The amount of a gift or hospitality must be reasonable in the light of local legal provisions. If it exceeds this reasonable amount, it must be returned to the sender with thanks and an explanation of the Group's policy on gifts and hospitality
 - Paying the costs of food service and/or accommodation for a customer, partner, or supplier is possible if the principle has been approved in advance by a line manager, and if the costs are reasonable in relation to the prices generally charged.

This policy does not apply to promotional gifts (pens, mugs, calendars, stationery, etc.) bearing a company's name or logo, provided they have no significant financial value.



PRACTICAL EXAMPLES

A client or prospect, whom I invite to a company product presentation seminar, asks for the company to cover their travel expenses as well as those of their spouse who is accompanying them.

The company covers the travel and hospitality expenses of the person invited by reason of its strictly personal nature. The costs related to the travel and hospitality of their spouse remain the responsibility of the prospect.



When I make a commercial gesture, by giving the buyer an additional license at a very low price or a “remote control” shaped like an iPhone, is that corruption?

If the commercial gesture on the license concerns the purchasing company, the “remote control” can be considered as an advantage given personally under the guise of an official order (the buyer appropriating the iPhone for personal use). This is an act that could be qualified as corruption.

From the moment the gift or loan is established between the company and another legal entity whose activity benefits a public or private community, without allowing for personal enrichment on the part of the purchaser, then it is not corruption.



A supplier offers me, as a company buyer, tickets to a football match while a consultation is ongoing.

There are specific situations, such as tender periods, during which it is prudent to abstain to avoid creating doubt or triggering a rumor.



A customer tells me about their child who is looking for internships or a first professional experience corresponding to the company’s areas of activity. I understand that this would facilitate the signing of new contracts. How should I react?

The Company is always interested in welcoming new talent. They must follow the selection process implemented by the company. The opportunity to apply for a position is open to anyone who has the required skills and must be absolutely independent of any commercial consideration. Your client must understand this.

In all cases, inform your hierarchy and report the situation to human resources responsible for the selection process.



Facilitation payment

Facilitation payments are strictly forbidden.

You must neither offer nor promise such payment. Immediately inform a line manager of any refusal, particularly if it could represent a safety risk to the Group.



PRACTICAL EXAMPLES

I witnessed a situation where two local tax officers made it very clear to the financial manager that if he wanted to avoid a tax audit related to the status of expatriates and tax returns, he had to give them an envelope. What should be done in this case?

This situation is indeed an example of passive corruption of public officials if the subsidiary's managers were to comply.

- A first measure is to never be alone when dealing with public officials.
- The second measure is to explain the rules to which the company is subject.
- The third measure is to note the elements that allow the identification of the two public officials.
- The fourth measure will be to report the situation internally to initiate action with the competent authorities.

A FACILITATION PAYMENT consists of paying a sum of money, directly or indirectly, to facilitate or accelerate the completion of an administrative formality (border crossings, permits, administrative documents, etc.).



I regularly use an agency to obtain a visa quickly. Is this corruption?

In this case, you are paying for a service, which is the subject of a formal contract and performed by a duly registered company. This service covers the time spent by a person from the service provider to carry out the visa application process on your behalf. If the price of the service offered is at a market price and clearly distinguishes the amount paid to the administration, supported by an official receipt, from the part of the service rendered by the company, then the situation presents a low risk.

Otherwise, the situation becomes risky and should be discussed with your supervisor or internal referent.



PRACTICAL EXAMPLES

A client suggests that we discuss their needs over a meal or a round of golf, which I understand I should pay for. How should I react?

While conviviality is important for maintaining an interpersonal relationship with your client, your professionalism is even more important.

Keep the following points in mind:

- Comply with regulation: Is this approach in compliance with the laws and internal rules or accepted practices within the company?
- Be reasonable: Do you have the approval of your hierarchy and/or marketing and/ or partnership development to engage in this approach? In addition, is there a risk of personal enrichment of a person who is involved in the award or supervision of your contract with the Client?
- Be responsible: Do you have the approval of your hierarchy to engage in this approach?
- Keep Records: Could I have authentic supporting documents?



A colleague told me that a customs officer made him understand that he had to pay him to be able to go through customs. While examining his belongings, he threatened to keep him for several hours, while carrying out security checks and making him take the first flight back. What should be done in this case?

In such circumstances, keep calm, refuse to pay and retain any identifying information about your attackers to allow the company to act accordingly. As an exception to this rule, in case of real danger to persons, the company's priority remains the protection of its employees.

Lobbying

Lobbying as such is not prohibited, provided it is carried out in a responsible manner, i.e. in full transparency, in compliance with the laws, regulations, and international conventions of the country where it is carried out, and on the basis of reliable information.

We reserve the right to participate in the dialogue that accompanies the drafting of regulations in the countries in which we operate, and to take part in working meetings of professional organisations.

LOBBYING involves contacting a public official responsible for drafting and voting on public decisions, with the aim of influencing the content of a public decision likely to have an impact on our activities



Sponsorship and philanthropy

Philanthropy and sponsorship provide an opportunity for us to contribute to charitable or humanitarian projects, support cultural or sporting activities and projects, and promote educational institutions and our values.

Nevertheless, these transactions remain sensitive, as they can be used to conceal practices that could be considered corruption or influence peddling, and therefore require particular attention.



PRACTICAL EXAMPLES

I am sometimes asked, as a representative of the Company, to contribute to the financing of activities organized by communities or associations for which my client is responsible. How should I react?

Participation in such events must meet the following criteria:

- Comply with regulation: Is this approach in compliance with the laws and internal rules or accepted practices within the company?
- Be reasonable: Are the conditions of this contribution proportionate to the nature of the event?
- Be responsible: Do you have the approval of your hierarchy and/or marketing and/or partnership development to engage in this approach? In addition, is there a risk of personal enrichment of a person who is involved in the award or supervision of your contract with the Client?
- Keep Records: Is the operation subject to a contract and is the payment of funds made to the benefit of the said association? Could I have authentic supporting documents?

These transactions must:

- comply with each country's legislation
- make sense in terms of our business and comply with its ethical principles
- receive prior approval by Group management
- be the subject of a written agreement
- be duly recorded in our accounts.

For the record, we do not support any political party or make any political contributions. You are prohibited from using the Group's resources or image to procure any advantage for/from political parties or public officials.

SPONSORSHIP is material support for an event, person, product, or organisation with a view to deriving a direct benefit. It is generally designed to promote the company's brand image and raise its profile.

PHILANTHROPY is the financial, human or material support (donations) offered to an organisation of general interest without any equivalent consideration for the donor.





While a tender is in progress, a local elected official involved in the selection of the companies to which the contract will be awarded suggests that the Company participate in the financing of the city's football team jerseys.

This type of proposal should be refused. More generally, in the case of charitable donations, it is important to ensure the quality and reputation of the charitable organization. Furthermore, the donation should not be considered as an attempt to obtain an undue advantage; it should never be paid to a natural person, nor paid in cash. In any case, this type of donation must be validated by Management.

Cronyism

A candidate must not be hired based on influencing the judgment of a decision-maker to gain an advantage.

Candidates cannot be hired simply on the recommendation of an employee or partner. Hires are made on a merit and needs basis, duly approved by management.

Candidates are selected after a detailed analysis of their resume and a subsequent interview process once a shortlist has been drawn up and prior authorisation has been obtained from management. Co-option is possible when it complies with the principles set out.

Public procurement

You must be particularly vigilant with public procurement in all countries, and in their relations with public officials. Public procurement is subject to specific, strict regulations and procedures that must be followed in every respect.

All public procurement contracts must comply with internal rules and procedures and be submitted for review by the Group's legal department if necessary.

Act with integrity and transparency. All forms of corruption and influence peddling involving public officials, authorities, or government agencies are strictly prohibited.

In particular, it is forbidden to offer a public official anything that constitutes or could constitute a personal advantage for themselves or their close relations.

PUBLIC PROCUREMENT entails contracts entered into by Group entities with one or more public purchasers (a country's government, a national, regional or local public entity, entity governed by the Public Procurement Code of the country in question) to meet the purchaser's needs for work, supplies, or services.





FRAUD

Fraudulent acts are specific and deliberate offences such as swindling, corruption, extortion, embezzlement, misuse of corporate assets, forgery, etc.



PRACTICAL EXAMPLES

One of my clients who wishes to benefit from government aid that only partially covers the cost of acquiring the solution, asks me to help him in his approach so that he can be fully reimbursed by the government aid that he is sure to benefit from. This aid involves an artificial increase in the total cost of the solution to be financed. What should I do?

This case constitutes a fraudulent approach on the part of the client and could expose the company to legal proceedings for fraud, forgery, and the use of forged documents.

We recommend that you discuss this situation with your supervisor or referent to find an operational solution.

FRAUD is the act of deliberately deceiving others to obtain an illegitimate benefit or to circumvent legal obligations or Group rules. There are many ways to commit fraud, some of which are difficult to detect (falsification, concealment, etc.). Fraud can occur both internally (embezzlement, misrepresentation, etc.) and externally (swindling).



Corruption is often accompanied by a fraudulent act. We are committed to putting in place procedures that prevent the risk of fraud and to raising employee awareness of fraud risks, while informing them of their rights and duties.

Inform a superior immediately if you detect any risk of fraud.



CONFLICT OF INTEREST

You must endeavour to not place yourself directly or indirectly in a conflict of interest.

You must declare in advance to a line manager any outside commitment or personal or professional relationship likely to interfere with your obligations to the Group or give rise to a real or perceived conflict of interest.



PRACTICAL EXAMPLES

How can I tell if I am in a conflict of interest?

You can ask yourself the following questions:

- Am I in a position where my role in the organization or this project could allow me to obtain information or a service for the benefit of my personal interests or those of my family?
- Am I in a position where I both enter and validate data in a system?

We recommend that you discuss this situation with your supervisor or referent to find an operational solution.

In the event of a conflict of interest, immediately inform your line manager and refrain from interfering in any relations with the third party in question until a solution has been found.

A CONFLICT of interest arises when an employee's personal interest hinders or is likely to hinder their objectivity, impartiality or ability to carry out their responsibilities within the Group. The interest may be direct or indirect, and may result from financial or professional commitments, political or ideological affiliations, or family ties. It can also relate to a non-profit, cultural, sporting or other affiliation.



RELATIONS WITH THIRD PARTIES

We interact not only with customers, but also with partners, suppliers, subcontractors and others.

We expect every customer, partner, supplier and subcontractor to behave ethically and to comply with the principles set out in this Charter.

Under anti-corruption laws, we may be held liable in the event of misconduct committed in our name, not only by our employees, but also by third parties.

Consequently, you must remain vigilant in verifying such third parties when entering contracts or monitoring relationships with them. You must verify the integrity of the customer, partner, supplier, or subcontractor by assessing their intrinsic quality, as well as the integrity of the business relationship by assessing the associated legal, economic and material conditions.

Report any unethical acts or behaviour you know of or suspect to your line manager.



A distributor asks me to artificially increase the amount of a quote that he must submit to the end customer in order to increase his margin.

There is a suspicion that the additional margin could be used to pay bribes. The distributor's margin must remain in line with usual practices. Any additional margin must be justified by services provided by the partner (training, after-sales support, etc.). Such a request must be refused, recorded in writing and reported within the company.



PRACTICAL EXAMPLES

When reading this code of conduct, I discovered that our Agent-Distributor, with whom we have had excellent relations for several years, has quality relationships with the end customers of the company's products using practices that amount to corruption. I note that these practices are very common locally.

All countries have anti-corruption laws that are more or less precise. Sometimes these are not always respected. However, in our globalized world, the lines are shifting, and the Company, as a subsidiary of a recognized international group, must ensure compliance with the rules everywhere. We recommend that you remind your agent-partner of the existence of local anti-corruption laws, of an anti-corruption clause in the agreement signed with the Company, and that you report this situation to the internal anti-corruption referent for analysis.



An agent invoices amounts that cannot be justified by services that he has allegedly performed.

It must be refused because there is a suspicion that these invoices could be used to pay bribes.



An Intermediary requests that his invoices be paid to an account other than the official account of his company validated by the Company.

It must be refused because there is a suspicion that these payments are bribes.

We recommend that you discuss this situation with your supervisor or referent to find an operational solution.

ANTI-COMPETITION – UNFAIR COMPETITION

We fully adhere to the principle of free competition in a free and open marketplace, in accordance with applicable regulations.

Unfair business practices are therefore prohibited, as is non-compliance with national and international competition rules.

For example, any form of collusion or concerted practice with competitors that could restrict free competition is prohibited. You must not collude with a competitor regarding prices, sales territories, assigning customers or any other matter. We undertake to determine prices, sales territories, and sales and purchasing conditions independently of our competitors.

Abuse of a dominant position and the sharing of commercially strategic information with competitors are also prohibited.

Failure to comply with competition rules may expose us to administrative, civil, and/or criminal penalties. In addition to financial penalties, we are exposed to exclusion from markets, damage to our reputation, loss of confidence from partners, etc.



To prevent any breach of competition law, you must not:

- seek to gain a competitive advantage through illegal or unfair practices
- exchange information with Group entities or competitors if they respond to the same call for tenders
- attend situations that give rise to inappropriate agreements or exchanges of information between competitors.

More generally, you must comply with the competition rules in force within the Group.

Report any actions or behaviour that you know or suspect may breach competition rules to your line manager.





INSIDER TRADING

The use of inside information exposes us and our employees to heavy criminal and/or administrative penalties, as well as a significant image risk. Even a mere attempt is punishable.

INSIDER TRADING is a securities trading crime which consists of carrying out illicit transactions on the financial market by directly or indirectly using inside information. This is an anti-competitive practice used to illegally obtain a disproportionate advantage on the financial markets.

INSIDE INFORMATION is confidential information that has not been made public and is likely to have a significant influence on the market price, and more specifically on a company's share price. These may include financial statements, sales forecasts, major transactions in progress, negotiations in progress, and so on.



In all circumstances, you must:

- comply with all relevant national and international regulations and provisions
- ensure the confidentiality of inside information to which you have access (limiting access, precautions for storage and transmission, etc.)
- not disclose inside information, nor buy or sell shares in a company until that information has been made public.



COMPLIANCE WITH INTERNATIONAL SANCTIONS AND EXPORT CONTROLS

Sanctions are required to be enforced and followed. You must ensure that your business relationships and the activities in which you engage do not conflict with any applicable sanction regimes.

When doing business with a customer, partner or supplier, you need to be particularly vigilant as to whether it has any connection to a state, territory, person, or company subject to international sanctions.

Contracts should also include provisions protecting us from any breach of international sanctions and export control regulations, enabling us to terminate the business relationship with a customer, partner, or supplier that has failed to comply with the regulations. You can contact our General Counsel at: legal@acoem.com

ECONOMIC AND FINANCIAL SANCTIONS, aimed at prohibiting or restricting trade in goods, technologies, or services with certain states, territories, persons or companies, may be adopted.

SANCTIONS can take a variety of forms: freezing funds and economic resources, restricting access to financial services, military or sectoral embargoes, etc.



MONEY LAUNDERING AND TERRORISM FINANCING

Although these two activities are different, they generally exploit the same weaknesses in financial systems.

We are committed to the fight against money laundering and the financing of terrorism and comply with the regulations and policies applicable in all the countries in which we operate.

We are committed to being transparent, honest and lawful in our financial activities.

You must:

- comply with all relevant national and international regulations and provisions
- verify the authenticity of every financial document and the legality of the transaction to which it relates, whether it concerns a customer, partner or supplier
- be vigilant, in particular by checking that all payments made are going to a legitimate destination
- refuse all cash transactions
- immediately report any suspicions of money laundering or terrorist financing to a line manager.

All our customers, partners and suppliers must also follow this commitment.

MONEY LAUNDERING consists of concealing the nature and origin of funds derived from criminal activities (terrorism, drug trafficking, corruption, tax fraud, etc.) in order to reintroduce them into the legal financial system. It generally involves three stages:

PLACEMENT: Injecting funds from criminal activities into the legal financial system without the knowledge of the supervisory authorities.

LAYERING: Concealing the origin of funds through a series of transactions and accounting tricks.

INTEGRATION: Withdrawing the now-“laundered” funds to be used for their intended purpose.

TERRORISM FINANCING is providing, collecting or receiving funds and using various financial instruments to support terrorist activities.





TAX EVASION

We have zero tolerance for tax evasion.

We act with fairness and integrity in all our transactions and business relationships, but also implement and apply effective systems to combat these practices (setting up appropriate and secure communication and reporting channels, informing employees of the risks associated with tax evasion to encourage them to be vigilant and to recognise, prevent and report any wrongdoing, etc.).

TAX EVASION refers to all illegal actions aimed at deliberately circumventing a country's tax laws to avoid paying the taxes normally owed to that country.



To combat these practices, you must:

- comply with applicable regulations to combat tax evasion
- promptly report any wrongdoing to a line manager
- not threaten or retaliate against a person who has refused to commit tax evasion.



ACCOUNTING RECORDS

We comply with strict accounting and financial reporting principles and rules.

In particular, we act transparently to give a true and fair view of our financial position, and comply with all applicable laws, regulations and procedures.

You must ensure that all transactions are properly documented, identified and recorded in our accounts in accordance

with accounting standards and internal procedures and rules.

We do not tolerate any intentional misrepresentation of financial reporting, including any attempt to knowingly create false or misleading records for any reason, or to conceal the true nature of a transaction.

CONFIDENTIALITY

Confidentiality is essential to our long-term future.

This means that any confidential information relating to the Group, a customer, a partner or a supplier is subject to strict confidentiality.

You must:

- use confidentiality agreements before ever exchanging confidential information with a third party, in particular a customer, partner or supplier
- transmit confidential information relating to the Group's activities only to authorised recipients
- not mention any confidential information relating to the Group's activities or those of its customers, partners, or suppliers in public places
- be vigilant regarding subjects discussed with loved ones, acquaintances or any other third parties when they concern the Group, its customers, partners or suppliers.

CONFIDENTIAL INFORMATION relates

to or belongs to a natural or legal person. Its communication and/or use is restricted and/or prohibited by contract or by law due to its nature.

This includes information bearing a confidentiality notice that is strictly for internal use.

Information that has been disclosed after prior written authorisation has been obtained, is in the public domain, has been lawfully received from a third party, is the result of the application of a mandatory legal or regulatory provision, or is the result of the enforcement of a final court decision or arbitration award, is not considered confidential.





PROTECTION OF GROUP ASSETS (INTELLECTUAL PROPERTY)

As intellectual property is an essential asset for our success and development, it is everyone's responsibility to protect it.

In all circumstances, therefore, it is essential to:

- use the contracts drawn up or reviewed by our legal department whenever dealing with a customer, partner or supplier, to provide a legal framework for all aspects of intellectual property, particularly its protection
- not disclose information protected by intellectual property without prior authorisation.

We also protect and respect the intellectual property of our customers, partners, and suppliers.

INTELLECTUAL PROPERTY is any intangible asset resulting from an intellectual activity, protected or likely to be protected, in accordance with national or international laws relating to intellectual property rights and similar rights (such as the protection of business secrets).

Our intellectual property includes inventions, source codes, software, documentation, trademarks, designs and models, as well as protected confidential information (know-how, business processes, marketing plans, etc.). Depending on their nature, these assets are protected by intellectual property rights (patents, copyrights, trademarks, etc.) or similar rights (trade secrets).



CYBERSECURITY

To improve our productivity and efficiency, we make IT resources available to our employees.

We are vigilant about protecting those resources and our business systems from any real or potential external threat.

You are responsible for the proper use of the computing and networking resources which you have access to in the course of your duties.

You must read and strictly comply with the terms and conditions of use your local Acoem IT charter.

You are expected to contribute to the overall security of the information system. As such, the use of IT resources must be limited and faithful, to avoid overuse or misuse.

You must:

- apply the Group's safety recommendations
- not disable or attempt to disable the measures taken by the IT department to secure IT resources
- report any attempted violation of your account, any anomaly or abnormal behavior of an online third party to the CISO (Chief Information Security Officer) or CIO (Chief Information Officer) as soon as possible

CYBERSECURITY is the practice of protecting systems, networks, and programs from digital attacks. Cyberattacks are usually aimed at accessing, changing or destroying sensitive information, extorting money from users via ransomware or interrupting normal business processes.

IT RESOURCES refers to local information systems and communication resources, as well as those that can be accessed remotely, directly or cascaded from the administered network that we use, including but not limited to internet services such as web, messaging and forums, and all media, systems, and devices connected to them.



- use provided backup tools
- follow Group rules and procedures for software installation
- adhere to the network compartmentalisation provided by the IT department. Under no circumstances should you connect equipment not approved by the IT department to the network without notifying the IT department.

More generally, do not compromise the security of the Group's IT resources in any way whatsoever.

PERSONAL DATA PROTECTION

We recognise the importance of protecting personal data, whether it concerns our employees, customers, partners, supplier or subcontractors.

We are fully aware of the responsibilities involved in processing such data and are committed to adhering to all applicable personal data protection legislation in the countries where we are based or operate.

While the European General Data Protection Regulation (GDPR) remains our foundational standard due to its comprehensive approach to privacy, we are equally committed to complying with other relevant legislation. This includes, but is not limited to, the California Consumer Privacy Act (CCPA) in the United States, Brazil's General Data Protection Law (LGPD), and other evolving global frameworks that govern data privacy and protection. We strive to ensure that our practices meet or exceed these standards as both data controller and processor, thereby safeguarding the trust of all individuals whose data we handle.



PERSONAL DATA is any information relating to a natural person that enables that person to be identified directly or indirectly. A natural person can be identified by name, telephone number, government issued number, mailing address, image, voice, etc



In general, to ensure the protection of personal data, it is necessary to:

- comply with our personal data protection policies
- limit the use of personal data only to times when it is necessary
- collect, use and process personal data only for specific, legitimate purposes necessary for your business activities
- process personal data within the framework of a customer contract only after having obtained the customer's prior consent and signed contractual documents
- adhere to the defined retention periods
- not compromise the security of personal data.

In the event of a security breach or doubt, immediately report it to: legal@acoem.com





ENVIRONMENTAL COMMITMENTS

Environmental commitments

Through both our internal actions and our solutions, we strive to minimise the impact of our activities and those of our customers on the environment. To this end, we have adopted sustainable practices throughout our value chain, from product design to end-of-life.

Monitoring and complying with regulatory requirements

We are committed to monitoring and complying with environmental legal requirements in all countries where we do business or are likely to do so.

We take particular care to monitor and comply with current laws and regulations, as well as customer requirements concerning the prohibition or restriction of certain substances in products and manufacturing, as well as labeling for recycling and disposal.

“All environmental permits, authorisations and records are obtained, retained and kept up-to-date, and the corresponding operating and reporting requirements complied with.”



Reducing our environmental impact

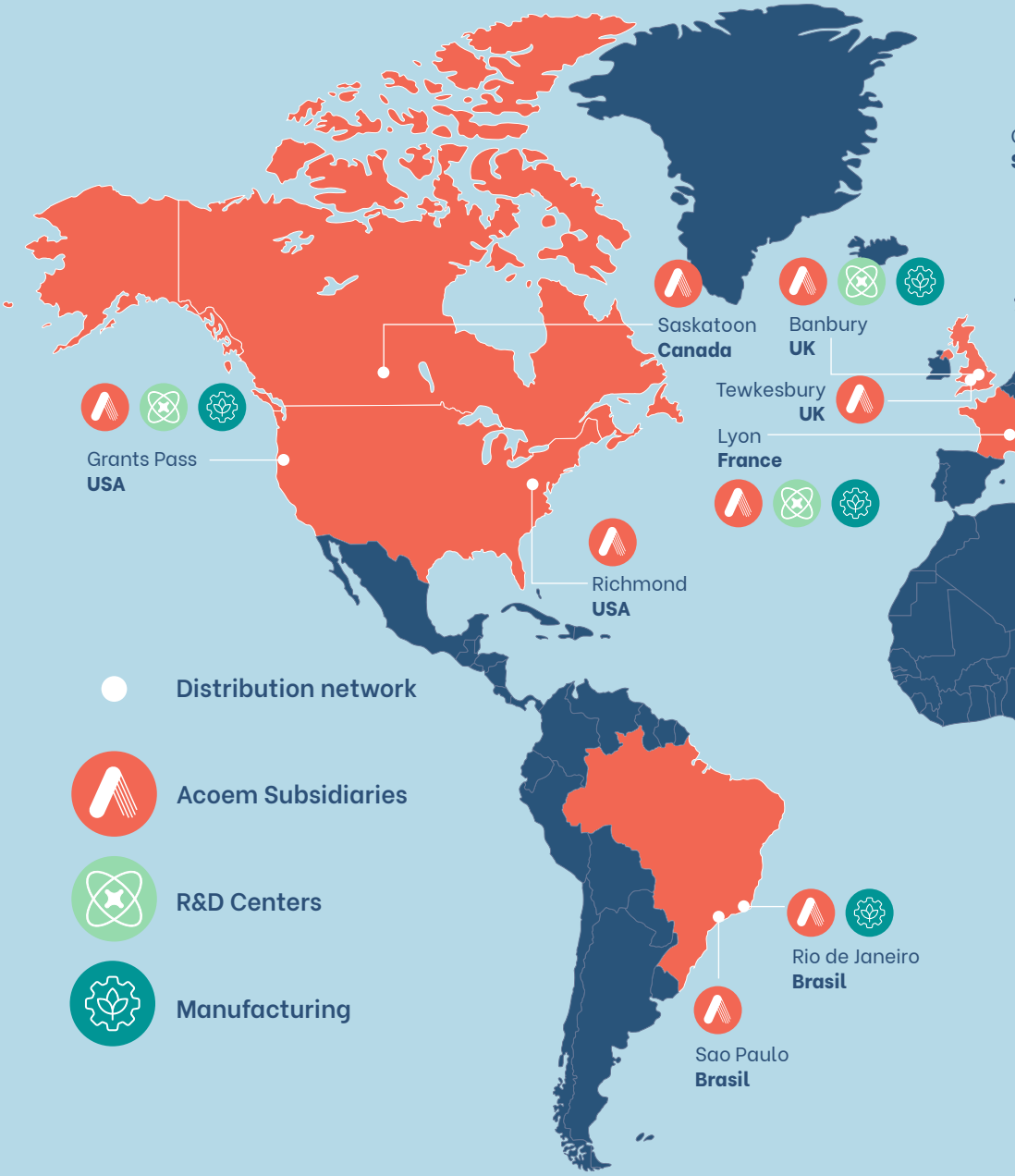
Going above and beyond laws and regulations, wherever possible we are committed to:

- reducing the environmental impact of our solutions by applying the principles of the circular economy (repair/reuse/recycle)
- reducing the carbon impact of our activities, in particular reducing our dependence on fossil fuels and our energy consumption
- preventing air, water and soil pollution
- continually striving to improve our environmental practices.


Extending these responsibilities to our suppliers/subcontractors

We are aware that it is essential to mobilise and engage our supply chain to have a greater impact on the sustainability of the solutions we offer our customers.

We make a point of letting our business partners know what we expect of them, so that they can share our commitment to sustainability.



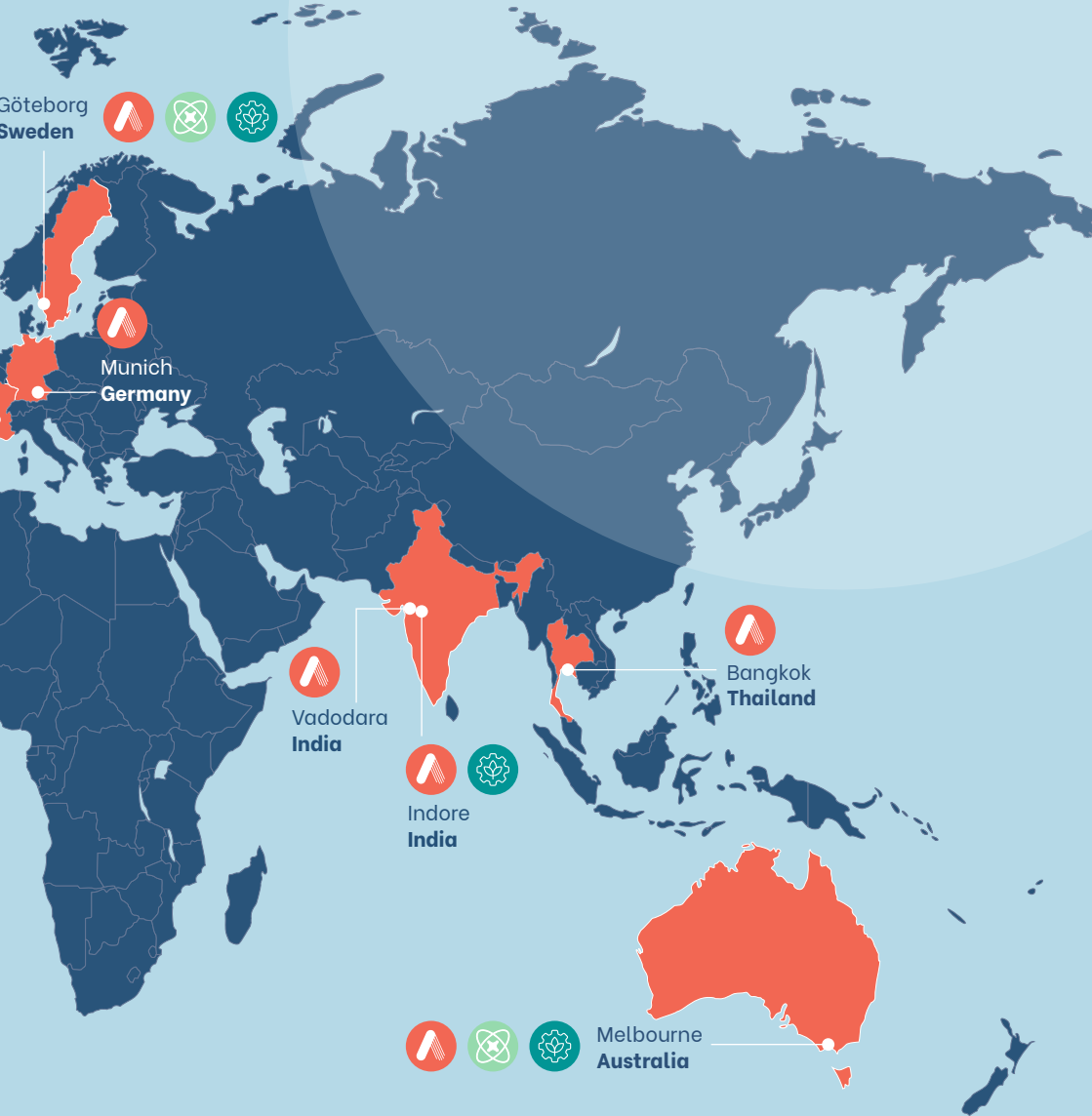
● Distribution network

 Acoem Subsidiaries

 R&D Centers

 Manufacturing

Worldwide presence
over 50 countries on 5 continents.





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