



THE ETHICAL CHARTER

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The Ethical Charter defines the principles and values to which Bansard International and all its subsidiaries (hereinafter "the Group" or "SEKO BANSARD" or "the Company") adhere to and which must guide each employee of the Group in the daily practice of his or her profession.

Integrity, ethics, social responsibility, loyalty, respect for the individual, transparency, the fight against corruption and unfair competition are fundamental values of the Group in the conduct of business.

This Code of Ethics applies to all Group employees (corporate officers, directors, managers, employees, etc.), hereinafter referred to as "employees", as well as to all persons with whom the Group is associated, such as its customers, suppliers, advisors, auditors, consultants, subcontractors, agents and other intermediaries representing Bansard International.

The principles set out in this Charter encourage SEKO BANSARD to conduct business and **get the job done in a way that maintains and builds trust with customers and stakeholders.**

Each Employee, whatever his or her hierarchical level, must apply, within the limits of his or her duties and responsibilities, the rules set out below, which are part of the loyal and good faith execution of his or her employment contract, and must ensure that they are also applied within his or her team or by the persons under his or her responsibility.

Employees who fail to comply with the applicable laws or regulations, or with the principles of this Charter, may be subject to disciplinary measures in accordance with the internal regulations and/or legal provisions.

1. COMPLIANCE WITH LEGISLATION

The Group is committed to respecting the laws and regulations in each country where it operates.

Compliance with the law is an essential value. It is the responsibility of all Employees to know and fully comply with the applicable laws and regulations, as well as the various policies and guidelines established by the Company in its various areas of activity.

All Employees are required to inform themselves of the provisions in force in the Company regarding their area of responsibility, to observe them and to consult, in case of doubt and need, the competent departments for further information and advice.



2. RESPECT FOR PEOPLE

The management of human resources, the leadership of employees, as well as the relationships between employees, are based on **the principles of mutual trust and respect**, with the aim of treating everyone with dignity.

The Group intends to apply a fair human resources policy that complies with the law. In particular, it prohibits any discrimination.

Any pressure, prosecution or harassment of a moral or sexual nature is prohibited.

Each employee has the right to respect for his or her private life, in particular through the regulations relating to computer data.

Ensuring and reinforcing the security of Employees in the exercise of their activities is a permanent concern.

3. FAIR COMPETITION

SEKO BANSARD ensures that **compliance with competition rules** to ensure that competition is fair and equitable. No action of the Group shall prevent, restrict or distort competition.

SEKO BANSARD rejects all unfair competitive and commercial practices, in particular any agreement with competitors or any concerted practice concerning financial conditions, the distribution of services, markets or customers.

Not only any formal agreement but also any concerted practice and any informal discussion having the effect or aim of restricting free competition or fair competition are prohibited.

This means that financial conditions are set independently, and that our competitors and customers are free to make their own decisions.

4. RELATIONS WITH CUSTOMERS, SUPPLIERS AND OTHER

SEKO BANSARD maintains the following relationships with all its stakeholders and, in particular, with its customers, suppliers and other business partners **honesty and fairness in the relationship**, in accordance with the ethical principles listed in the preamble.

Accordingly, the Group is obliged to honour its contractual commitments and to respect both the letter and the spirit of its commercial agreements. Employees must ensure that they act with professionalism, integrity and fairness in order to encourage clients to use the Group's services.



5. FIGHT AGAINST CORRUPTION

SEKO BANSARD is committed to **fight against corruption, influence peddling, illegal interest taking, misappropriation of public funds, favouritism or any other breach of probity** in the countries in which it operates.

It applies national and international anti-corruption laws in all countries where the Group operates.

6. CHILD LABOUR

SEKO BANSARD recognises the right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child's education or to be harmful to the child's health or physical, mental, moral or social development. The Group is committed to respecting local legislation on minimum working age and not working with subcontractors and suppliers who do not respect these values and commitments.

7. IMPRISONMENT, FORCED LABOUR, SLAVERY

SEKO BANSARD undertakes not to collaborate with third parties (service providers, partners, subcontractors, etc.) who subject their employees to forced labour, servitude or slavery, who work with prisoners, and/or who withhold identity papers, passports, training certificates, work permits or any other such documents. SEKO BANSARD prohibits all such behaviour.

7. CONCEALED WORK

SEKO BANSARD undertakes not to resort to concealed work and/or clandestine work, and to respect the labour regulations in force in the country where they carry out their activities. SEKO BANSARD prohibits all such behaviour and undertakes not to collaborate with third parties who do not respect this principle of the United Nations Global Compact.

8. PRIVACY

SEKO BANSARD **endeavours to ensure that confidentiality is respected within the Group and in the execution of its contracts in the use of data, information, know-how, intellectual and industrial property rights and business secrets, in connection with its activities.** All Employees are required to keep confidential information relating to Bansard International, its customers, suppliers and Employees to themselves.



Each employee must ensure that any information that is not public remains strictly confidential. This obligation of confidentiality covers not only information relating to the Company.

Each Employee must :

- limit the disclosure of confidential information to those who have a legitimate need to know;
- keep securely, in any format (paper or electronic), all confidential data relating to the Company's activities and those of the companies with which it has a business relationship;
- prevent any disclosure of confidential information to persons outside Bansard International.

SEKO BANSARD ensures **adequate working conditions for its employees**, including **health and safety**, who have a duty to contribute to it by respecting the Company's rules in this area.

The Group guarantees to its employees and stakeholders **a working environment that excludes discrimination**. Any form of harassment is prohibited and sanctioned in accordance with national legislation. The following grounds are prohibited: gender, sexual orientation, ethnic origin or religion, status as a staff representative, exercise of a trade union mandate, political opinions, disability, age and any other offensive physical, verbal or visual behaviour. Any form of harassment is prohibited and sanctioned in accordance with the national laws in force.

9. HEALTH AND SAFETY IN THE WORKPLACE - ANTI-DISCRIMINATION AND HARASSMENT ANTI-DISCRIMINATION AND ANTI-BULLYING - DISABILITY

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Each employee must respect the safety, rights and opinions of his or her colleagues as well as their cultural or specific characteristics.

SEKO BANSARD offers its employees training opportunities that are specially adapted to their field of activity and their requirements.



10. ENVIRONMENTAL PROTECTION - SOCIAL RESPONSIBILITY - SOLIDARITY ACTIONS

The Group is committed to **preserve natural and energy resources** and engages in **a process of continuous improvement with the award of the label 6PL** (www.label6pl.com) in collaboration with LSN (Logistique Seine Normandie) and co-financed by ADEME (Agence de l'Environnement et de la Maîtrise de l'Energie).

The Group is also committed to a **solidarity approach** to various concrete actions.

11. CONSIDERATION AND MODIFICATION OF THE ETHICAL CHARTER

This Ethics Charter is an addition to the internal regulations of the Group's subsidiaries.

It may be modified in order to adapt to changes in regulations.

It comes into consideration on 3 June 2018.

The procedure described above applies only to French companies and must be adapted to the local regulations applicable to each Group subsidiary.

Paris, 03 May 2018