

CIS

Integrated Life Support Services



ETHICS CHARTER

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1. Ethical conduct in our relations with third parties

The relationship that the CIS Group has with third parties, and in particular with our customers, is based primarily on the trust they place in us, and on the reputation and experience of the CIS Group throughout the world.

To maintain and strengthen this confidence, we *shall* comply with multiple obligations and strict rules of conduct. These *shall* be specifically defined and shared by all in a manner that does not adversely affect our reputation. We *shall* also, and in all circumstances, manage our words and actions, and demonstrate the utmost integrity.

1.1. The purchase of everyday goods and services

The CIS Group has established a *Purchasing Policy* (FR-01-POL-0011) based on three strategical axes:

1. To buy the best quality, at the best price and under the best conditions.
2. To establish a long-term relationship with our suppliers.
3. To prioritise local sourcing.

In the procurement of goods and services, (including intermediation services), the selection of suppliers *shall* be carried out in a fair manner on the basis of objective comparative criteria and in accordance with the CIS Group's invitation to tender procedures, if a market consultation is conducted.

Rates applied *shall* always be in line with those applied by the market.

With respect to invitations to tender relating to investments involving major purchases, at least three suppliers *shall* be consulted in order to effectively assess the best of three quotes.

A member of my family is the manager of a food product supplier company. I would like to place an order with his/her company.

You may inform the CIS Group Purchasing Director or the concerned Affiliate Purchasing Manager about the existence of this supplier in order to assess the suitability of placing an order with this company. However, the supplier can only be selected if the rates and services it proposes are competitive. Furthermore, you shall not intervene directly or indirectly in the selection of this supplier. In effect, any potential conflict of interests shall be avoided and the supplier shall be selected, if applicable, according to objective criteria, excluding any possibility of favouritism or unfair competition.

1.2. Anti-money laundering measures

The CIS Group's commitment to the principles of impartiality, integrity and openness is also reflected by its compliance with all laws relating to money-laundering practices in all countries.

As a general rule, money laundering is defined as the introduction of funds of an illicit origin into legal financial channels for the purpose of their concealment or giving them a legal appearance (a criminal offence punishable as severely as corruption under all national and international laws).

Managers and employees *shall* safeguard the integrity of the reputation of the CIS Group by helping to detect possible money laundering activities. They *shall* immediately notify the CIS Group top management or their line manager whenever they suspect money laundering, as for example, such as a client's reluctance to provide full information about the origin of funds or products their desire to make cash payments.

In particular, in the case of any doubts concerning payments in cash or the origin of funds paid by a customer or repaid by one of our partners (payment exceeding the amount owed, multiple sources of payments, etc.), we ask that you contact immediately your line manager for guidance.

A customer wishes us to make a settlement in several parts: one payable from an account in France in euros, another from several bank accounts domiciled in other countries denominated in different currencies, different from those indicated on the invoice. It also arises that the same customer asks us to allow for settlement for a portion in cash.

Such requests by the customer provide grounds for suspicion of money laundering. For that reason, it is necessary to refuse payments that are "out of the ordinary" and immediately report such requests to your line manager.

1.3. Prevention of corruption

In the fight against corruption, the CIS Group has adhered to the "Middlenext Anti-Corruption Code of Conduct", which is an integral part of this charter.

It is therefore essential to read this "Middlenext Anti-Corruption Code of Conduct" and to comply with it in all circumstances. This code of conduct is available on the website <http://www.cis-integratedservices.com/ethics> and the CIS Group intranet site.

1.4. Policy on gifts and invitations

The CIS Group has developed a *Policy on Gifts and Invitations* (FR-01-POL-0010) to help employees make the right decisions when they have to offer or accept, on behalf of the CIS Group, gifts, invitations or trips as part of their activities.

This policy applies to all departments and all Affiliates of the CIS Group worldwide. Each **Country Director** may, depending on the country, and with prior agreement of the top management of CIS Group, establish specific rules that are more rigorous, but never less rigorous. This *Policy on Gifts and Invitations* (FR-01-POL-0010) is available on the website <http://www.cis-integratedservices.com/ethics> and the CIS Group intranet site.

One of our main suppliers sent me a catalogue of luxury watches in order for me to choose the model that I liked.

This represents a gift of high value, which is completely unjustified. As such, this gift shall be categorically refused, sent back to the sender if already received and reported to his/her line manager.

1.5. Fairness, integrity and conflicts of interests

Integrity and loyalty *shall* prevail in all professional relations of all employees within and outside the Group. Employees *shall* in all circumstances engage in fair behaviour in their dealings with the CIS Group: as long as an employee is employed by the CIS company or one of its Affiliates, he or she *shall* act in the interests of the Group and abstain from any act of a disparaging nature or criticism that could harm the Group.

Furthermore, everyone *shall* be vigilant to avoid all situations resulting in a possible conflict of interests. In any negotiation, an employee may be faced with a situation of conflict of interests where there exists a direct or indirect personal interest in the decision that must normally be made in a completely objective manner. It is therefore essential for this purpose to spontaneously report situations of conflict of interest in order to perform a thorough analysis of the situation and take the appropriate measures to put an end to the conflict of interest.

It is possible that after this analysis of the situation and the interests involved, the situation does not present any difficulties and the interests can be compatible. However, it may also be necessary to take measures to put an end to the conflict of interest.

While conflicts of interests do not constitute in themselves criminal infractions, an employee involved in a conflict of interest could be liable for a number of related criminal offences such as bribery, traffic of influence, illegal taking of interest, moral or sexual harassment: these offences are severely punished in most countries.

Furthermore, the mere appearance of a conflict of interest may cause reputational harm to the CIS Group as well as its managers and employees.

Every employee *shall* notify in advance in writing (e-mail or letter) the legal department or his or her line manager of all situations described below:

- Any business relationship, under consideration or in progress, between one of the companies of the CIS Group and the employee (or one of their parents or close relation, or a company controlled by a parent or close relation);
- Any business relationship, under consideration or in progress, between a company competing with the CIS Group, a supplier of the CIS Group or a customer of the CIS Group and the employee;
- The acquisition of any interest or agency arrangement, under consideration or in progress, in a company competing with CIS, a supplier of CIS or a customer of the CIS Group;
- Any gift or advantage, outside the scope of normal practice, offered or received from a person or company having engaged, engaging or wishing to engage in commercial transactions with the Group (loan, advance, work, travel, catering services, etc.);
- And in general, any personal interest that might be in potential or clear contradiction with the CIS Group's interests.

In the event of doubt about how a relationship or transaction under consideration might be perceived, you are encouraged to discuss this with your line manager.

One of the transport companies with whom the CIS Group has worked for several years has offered me a position to serve as a director. Can I accept?

This all depends on the position you exercise within CIS, though as a general rule, if you accept this appointment, you would be tempted to give preference to resort to this company rather than another, including in circumstances where this company is less competitive than its competitors. In effect, you would in such a case have a personal interest for the CIS Group to work with this supplier. Accepting an appointment would therefore place you in a conflict of interest situation. It is for that reason preferable that you refuse such an appointment. In any case, before making any decision, you shall immediately report to your line manager the situation and obtain prior authorisation from the top management of CIS.

A supplier has offered me an agreement: if I guarantee that CIS will provide it with a certain volume of business, this supplier will in turn credit my bank account a commission for “referring business”. Is it legal?

This process is entirely illegal and unacceptable. Any kickback or payment, rebate, gift, paid by a supplier to an employee is considered to constitute corruption, and the employee who is a perpetrator or an accomplice of such actions would be immediately sanctioned and may incur civil and criminal liability.

In contrast, it is sometimes allowed, according to applicable legislation, to provide in certain supply contracts for back-end rebates or trade discounts, if CIS orders from the supplier amounts exceeding a certain sales volume. However, these back-end rebates, discounts and other inducements shall be in full compliance with applicable law and shall be acquired in favour of CIS (and not one of its employees!). Whenever an employee is faced with a provision of this type in a supply contract or has a doubt about the legality of the practices, the employee shall refer to the legal department or his or her line manager for guidance.

1.6. Respect for free competition

Competition must be freely permitted throughout the world within the limits imposed by laws governing fair trade and competition. All our business practices *shall* consequently comply with these laws which may vary from one country to another. However, within the CIS Group, there exists in addition a certain number of rules are common to all, and can be summarised as follows:

We conduct our business in a free and independent manner in all our markets. No prior agreement or understandings have been made with any of our competitors with respect to our pricing conditions, products, services to be provided, customers or commercial territory.

No information is requested from or disclosed to our competitors concerning our margins, costs, responses to invitations to tender, our market share, our terms of sale and all our practices with customers or suppliers.

We do not grant any improper advantages to one customer at the expense of another.

One of my acquaintances works for a competitor of the CIS Group and indicated that he could provide me with very interesting information about the competitor's margins, its prices and commercial policy... I would like to take advantage of this information when responding to a next invitations to tender!

It is strictly prohibited to exchange information and reach understandings with our competitors about our prices, services, pricing and commercial policies, etc. This obviously entails not disclosing this type of information to a competitor but also refusing to receive such information from a competitor. If you have information about one of our competitors, you shall under no circumstances take it into account invitations to tender as this would constitute unlawful collusion and is contrary to our values and laws governing fair trade and competition. In exchanges you may have with competitors, you shall abstain from disclosing information about the Group but also refuse to receive any information about the competitor.

Can I attend trade fairs or professional meetings in which competitors of the CIS Group are also participating without such attendance being considered to constitute unlawful collusion?

It is perfectly normal and even recommended to attend such trade fairs or professional meetings.

However, these events may in certain cases also entail risks. For that reason, such participation should be strictly limited to legitimate trade association meetings with acceptable commercial, technical or professional purpose, and exclude any meeting whose objective is to reach an agreement with competitors. In the event of any doubt arising in connection with a meeting of this type that it might possibly be unlawful or suspicious, you shall immediately leave the meeting and refer to your line manager.

1.7. Cooperation with public authorities

The CIS Group is present in many countries and committed to maintaining good relations with public authorities. National and local authorities in all countries have specific laws governing public procurement contracts destined to protect the public interest. These laws generally prohibit offering advantages to civil servants, often limiting recruitment of civil servants currently serving or having recently retired, and prohibit any behaviour that might be perceived as improperly influencing the process of rendering an objective decision.

The CIS Group employees *shall* be truthful and accurate in their dealings with public authorities and adhere to extremely strict rules of ethics, moral and business conduct in their relations with the latter.

In their dealings with public authorities, employees *shall* be familiar with and respect the laws and regulations in force, and only employees who are authorised for that purpose may contact public officials on behalf of companies of the Group.

1.8. Contributing to public affairs

Employees are free to contribute (without receiving any reimbursement from the CIS Group) to a political party or candidate for elected office provided they do so during non-work hours and with the assistance of their own personal financial or other resources.

Funds, assets or services of the CIS Group *shall* under no circumstances be used to support a candidate to an elected office, a political party, public official or committee in a manner that violates applicable regulations.

1.9. Principles against practices involving corruption of public authorities

The “Middlenext Anti-Corruption Code of Conduct” sets out the specific rules for the fight against corruption of public officials, to which the CIS Group and its employees *shall* comply.

1.10. Respecting rules of international trade

The CIS Group and its employees strictly adhere to the laws on export controls of the United Nations, the European Union, and French authorities.

Any breach of these provisions could result in severe sanctions imposed on the CIS Group, including a ban on export activities. Furthermore, the CIS Group could be subject to commercial sanctions by its customers: disqualification from invitations to tender, termination of contracts, etc.

2. Ethics within the CIS Group

2.1. Compliance with laws, regulations and tax provisions

The CIS company as well as all its Affiliates are particularly committed to adopting a role as a corporate citizen wherever it operates.

Accordingly, all the CIS Group employees *shall* comply with the laws and regulations in force on projects on which they are working within the framework of their professional activity: any situation, fact or event about which they have doubts as to its legality or appropriateness *shall* be immediately reported to the legal department of the Group for guidance.

In particular, it is imperative to ensure strict compliance with national and local tax regulations in the regions of operation and that everything is done within each CIS Group company to ensure the settlement of all local and national taxes owed.

It is furthermore specified that all employees have an obligation to refuse any instruction given or to engage in any action requested from their management in violation of the laws and/or principles set forth in this charter.

Any criminal or police investigation concerning the assets of the CIS Group or CIS Group employees within the framework of their professional activities *shall* be immediately reported to the legal department, the **Country Director** and the **VP Operations & Business Development**.

A CIS Group Affiliate was notified locally to repay a very significant and clearly excessive amount of back taxes. I consider that it represents an abusive adjustment and in fact a scheme by local authorities to illicitly obtain money. However, a local tax agent offered to halve the amount of the back taxes in exchange for immediate payment of an amount of money. It is in interest of the Affiliate and the CIS Group to accept this transaction!

On the contrary, the interest of the CIS Group and the Affiliate that this proposal from the tax agent be expressly and firmly refused. If accepted, CIS and the employees in question would become the perpetrators of or accomplices in acts of corruption. Even if this repayment of back taxes seems unjustified or excessive, this decision is issued by a public authority with jurisdiction that shall be taken into account in compliance with applicable laws and regulations. If the management of the Affiliate concerned and CIS' top management in effect consider that this request to repay back taxes is abusive, it is their responsibility to seek legal remedy in accordance with procedures provided for by applicable law.

2.2. Confidential information

The CIS Group discloses selected information about Group companies through its website, annual reports, press releases and any other means of communications accessible to the public. Accordingly, any information not officially made public by the CIS Group, regardless of the source, *shall* be considered confidential for the purpose of safeguarding its interests.

This also applies to information concerning customers, suppliers, partners, executives and employees that *shall* be considered confidential as well.

This confidential information is essential for the CIS Group as it contributes to promoting the value of its assets and the development of its activities. Its disclosure would adversely affect the CIS Group and could have criminal consequences for the employees concerned (misuse of corporate assets) in addition to resulting in civil liability and the application of disciplinary measures against the perpetrating employee.

Similarly, caution is necessary with respect to the disclosure of confidential information to other employees of the CIS Group. In effect, access to information *shall* be related to the functions performed by the employee concerned.

If the disclosure of confidential information to a third party is required for legitimate reasons (partner, customer, attorney, consultant or outside advisers, etc.) one *shall* ensure that this third party is informed of the confidential nature of the information and formally agrees to the conditions of non-disclosure. For this purpose, it is recommended to have this third party sign a confidentiality agreement for the purpose of ensuring the non-disclosure of this information.

As a general rule, any disclosure of confidential information in public places (bars, restaurants, elevators, public transit, airports, etc.) must be avoided.

Finally, in terms of communications, any relationship with the print or audio-visual media *shall* be previously authorised by the **Country Director** or the **VP Operations & Business Development** where the CIS Group or one of its Affiliate is cited, with the exception of those persons expressly authorised to communicate with outside parties within the framework of their functions. If an employee is contacted by a shareholder, this request *shall* be immediately forwarded to the top management.

In the event of doubt about the confidential nature of the information to be disclosed, we encourage you to refer to your line manager for guidance.

2.3. Privileged information and insider transactions

The CIS company is listed on the stock-exchange market Euronext Paris. As such, managers and employees of the CIS Group have complementary obligations with respect to privileged information and insider trading.

An insider is considered as any person having knowledge, through the exercise of their functions, of privileged information. Persons qualified as insiders include both employees of the company as well as outside persons.

Privileged (insider) information is information not accessible to the public having a potential impact on decisions by investors to purchase or sell securities or on the share price of the CIS Group or another company. All information possessing value for an investor is subject to strict legal provisions for the purpose of preserving the confidence of the public and the integrity of financial markets. This information may be financial in nature but also concern different activities of the CIS Group (the recruitment or placement of a key employee, obtaining or losing a contract, a merger project, etc.).

The French Monetary and Financial Code prohibits any insiders from trading securities (shares or bonds) of the company when they have knowledge of privileged information and provides for criminal sanctions that include up to prison sentences.

Accordingly, we recommend that when you learn of rumours or certain information relating to possible transactions, to consider such information as strictly confidential and in consequence, not to directly or indirectly make use of such information (for example through the intermediary of a member of your family or close relation) by purchasing, selling or having purchased or sold the security of the CIS Group or financial products related to the security, and not to disclose to any person whomsoever such information.

Furthermore, you *shall* refrain from acquiring or selling shares of the CIS Group (or financial products related to these securities) during a period of one month preceding the publication date of the consolidated annual and interim consolidated financial statements. You will be informed by the **Country Director** or the financial department of the publication date of these financial statements.

In the event of doubt concerning the nature of information or a suspicious transaction, we encourage you to communicate this information in writing to your line manager for guidance.

As a result of my position at CIS, I am aware of information that, once it becomes public, will certainly cause the share price of the CIS Group to rise rapidly. To what extent may I be considered as an insider? Can I have a family member purchase the shares?

WARNING: Neither you, a member of your family or a close relation may make such a transaction. In effect, you are considered as an insider. As such, you are prohibited from either purchasing or selling CIS Group shares as long as the transaction has not been rendered public, including through a third party (parent, friend, relation, colleague, etc.).

Furthermore, even if you do not intend to engage in stock market transactions, disclosure of confidential information to third parties is strictly prohibited, even to members of your family or close relations, regardless of the circumstances.

2.4. Use of assets of the CIS company and its Affiliates

The CIS Group makes available to its employees a range of goods, services and tools adapted to the functions of each so that all employees can effectively carry out their work. All this equipment and/or documents are the property of the CIS Group. They *shall* be protected in order to prevent any incidents of theft, damage or loss and *shall* be returned as soon as requested to the CIS Group.

This equipment and/or documents may be tangible in nature (computer equipment, telephone equipment, office supplies, etc.) but also intangible such as information or documents about the CIS Group (organisation charts, technologies, processes and methods, studies, software, marketing plans, internal advertising, business development plans, etc.).

Employees of the CIS Group *shall* use this equipment and/or documents in an individual manner. In effect, all this equipment and/or documents *shall* not be communicated, loaned, given or exchanged, whether to a person outside the Group or other employees of the Group, for the duration of your employment with the Group and even after your departure from the Group.

Furthermore, this equipment and/or documents *shall* be used exclusively for professional and legal purposes within the framework of missions performed for the CIS Group, excluding any other usage, of criminal or inappropriate nature, or for private purposes.

The CIS Group will take necessary measures to protect its equipment and/or documents through all legal means.

Furthermore, with respect to the CIS Group's IT systems, and in order to control access and use, the CIS Group has adopted an *IT Charter* (FR-26-SPC-0001) available on the Group's intranet service. This *IT Charter* applies to all employees and to all users of its IT services.

Employees undertake to strictly comply with this *IT Charter* and the rules set forth therein.

2.5. Third-party intellectual property rights

All confidential information held by the CIS Group respects the intellectual property rights of third parties.

The CIS Group management and employees *shall* not obtain confidential information (in any form whatsoever) about third parties in an abusive manner and may disclose such information only with the authorisation of the latter solely to persons with a compelling need to know.

In case of non-compliance by one of CIS's employees, the CIS Group reserves the right to take all appropriate measures in the event of non-compliance by that employee.

2.6. Compliance with delegations of authority and signing authorities

All employees undertake to not enter into commitments on behalf of the CIS Group beyond the authorities granted to them within the framework of their functions within the Group. Any person having received delegation of authority or signature *shall* strictly comply with the terms and refrain from making any decisions which exceed the authorities granted to him or her.

Each employee *shall* also ensure that he or she incurs obligations on behalf of the CIS company or one of its Affiliates solely for items and limits related to the scope of his or her function.

As a general rule, every employee *shall* ensure, before entering into commitments on behalf of the CIS company or one of its Affiliates, that he or she possesses the authority to do so (either by virtue of his or her employment contract, job description notice, a delegation of authority or other means) that this commitment is compliant with the instructions and guidelines given by his or her management. The employee *shall* also, before implementing any decision, evaluate the financial, legal, labour-related or other consequences of the transaction under consideration for the CIS Group.

In this respect, we invite all employees to be particularly vigilant with respect to the consequences of letters, e-mails and other correspondence they may produce within the framework of their functions.

All employees are responsible vis-à-vis their line managers of actions taken by them in the name of the CIS company and/or its Affiliates, exceeding the authorisations, powers, delegations, instructions or guidelines given to them.

2.7. Confidentiality of personal data

The confidentiality of personal data of the CIS Group employees *shall* be respected at all times. Employees *shall* collect, use, record, process and communicate information of a personal nature in compliance with the policies of the CIS Group with respect to confidentiality and applicable laws.

The CIS Group is committed to safeguarding the personal information collected within the framework of your functions. Access to this information is possible only subject to the prior consent of the employee concerned, except for information and formalities required to comply with legal obligations in each country where the CIS Group operates (notably requests for visas or working permits).

Employees responsible for maintaining these records or having access to personal information about the Group employees guarantee that such information is not improperly or illegally disclosed. In addition, the CIS Group has a *Personal Data Protection Policy* (FR-01-POL-0013).

2.8. Human resources policy – equal opportunity employment

The motivation, professionalism and team spirit of our employees are essential for us to meet our objectives. Employees therefore have an obligation of mutual assistance and respect.

Every year, many employees join the CIS Group from around the world and all are welcome, regardless of their gender, nationality, ethnic origin or nationality, caste, age, physical condition, disability, religion, political opinions or philosophy, membership of labour unions, sexual orientation or other distinctive attributes. Employees *shall* work with their colleagues and customers, business partners and other stakeholders in a manner that conveys the same respect for all and that does not into consideration either differences or similarities.

With respect to recruitment, remuneration, access to training, advancement and terminating the relationship of employment or retirement rights, CIS Group's actions are based on an objective evaluation of the qualifications and qualities required for the position. In all areas, and as a general practice in all working relations, employees *shall* abstain from all forms of discrimination, whether active or passive.

It is the responsibility of each department head to ensure the training for each member of his or her team for the tasks they are assigned (including with respect to health and safety) and to regularly evaluate their skills, progress, and define with them areas for improvement, difficulties encountered, etc.

For several months I have been engaged in a nonprofessional relationship with my assistant. Should I report this to my line manager?

Personal relationships between colleagues can in certain cases result in conflicts of interest. This is the case when a relationship exists between a member of the same team or between a line manager and a subordinate. In this example, you may be tempted to advantage your assistant over other members of your team. Furthermore, we warn you that relationships between a manager or supervisor and a subordinate could be considered from the outside as constituting moral or sexual harassment. Consequently, we advise you to speak to the human resources management in order to prevent any suspicion of conflict of interests, while respecting your private life and the professional situation of the employees involved.

2.9. Protection of children and underage workers

The CIS Group adheres to the United Nations Global Compact and is committed to the effective abolition of child labour.

As such, it is not permitted to use employees under the legal working age regardless of the country or local jurisdiction. If no age limit is set, individuals *shall* be at least 15 years old.

Regardless of the minimum legal age, and where minors are permitted to work, we expect all our employees and third parties to comply with all legal requirements, particularly those relating to working hours, wages, skill levels and working conditions.

Any work that may be mentally, physically, socially or morally dangerous or harmful to workers under the age of 18 is strictly forbidden to underage employees.

2.10. Protection against slavery and trafficking in human being

“No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms.”

(Article 4 of the Universal Declaration of Human Rights of 10 December 1948)

The CIS Group has a zero-tolerance approach to modern slavery. It is committed to preventing slavery and human trafficking in its operations and supply chain, and to complying with anti-slavery and anti-human trafficking laws in the countries where it operates. Similarly, the CIS Group expects the same level of prevention and commitment from its business partners (customers, suppliers, etc.).

In addition, the CIS Group has a *Policy on Modern Slavery and Human Trafficking* (FR-01-POL-0012) outlining the CIS Group anti-slavery values and the preventive actions taken by the Group, as well as a “Middlenext Anti-Corruption Code of Conduct” that encourages employees and relevant external business partners to do the right thing by clearly stating the actions and behaviour expected of them when representing the company. We strive to maintain the highest standards of ethical conduct and behaviour in our overseas operations and the management of our services.

The CIS Group's commitments to combat slavery and human trafficking are part of the obligations of all the CIS Group employees under their employment contracts.

2.11. Protection against harassment

No form of harassment, whether physical or in written form, electronic or oral, targeting any person, employee, supplier, subcontractor, customer or other, will be tolerated within the CIS Group and will be dealt with in accordance with rules applicable in each country where we operate, in addition to disciplinary sanctions that will be applied to the person engaged in such actions.

An employee who is a victim of harassment, or who suspects a person is a victim of harassment by another CIS Group employee, or by a business partner of the CIS Group, *shall* immediately notify his or her line manager or the human resources management or the top management, where appropriate, to evaluate the situation of harassment and take the appropriate measures.

In addition, the CIS Group has an *Anti-Harassment Policy* (FR-01-POL-0014).

2.12. Sustainable development and environmental protection

Each employee contributes to the CIS Group in reaching its sustainable development objectives by supporting economic progress, environmental protection and social development. One way of achieving this objective is to take the appropriate measures to improve the quality of life in the communities and countries where the CIS Group operates.

The CIS Group deals with all stakeholders in a socially responsible manner within the framework of a sustainable development approach.

Furthermore, the CIS Group encourages all employees to contribute to sustainable development actions in countries where projects are underway. In effect, everyone can contribute to this approach by encouraging an open dialogue with stakeholders about contributions and the CIS Group economic, social and environmental performances, subject to applicable rules governing confidentiality.

Given the nature of our activity, all the CIS Group employees *shall* ensure compliance with laws and regulations on the environment and, more generally, are required to respect the environment and contribute to energy savings, regardless of where they work.

Additionally, all of the CIS Group employees involved in the management and development of the CIS Group activities *shall* possess knowledge about the rules and principles applicable to environmental protection. Any risk of pollution and/or abnormal energy consumption *shall* be reported to the **Country Director** and the **VP Operations & Business Development**.

Every employee must actively contribute to CIS Group's environmental approach and reduce the negative environmental impacts of our activities.

In addition, the CIS Group has a *Sustainable Development Policy* (FR-01-POL-0002).

2.13. Hygiene – health and safety – substance abuse

We remind every employee that the application of the most rigorous rules of hygiene is critical for our activity. The consequences of a failure or lapse in this area could be disastrous for the CIS Group's image and continuing operations. Accordingly, every employee *shall* personally ensure compliance with these rules of hygiene.

Furthermore, we have an obligation vis-à-vis our colleagues, their families and communities, to protect the environment and safety of everyone at their places of work. The CIS Group has adopted an extremely rigorous health and safety policy (including notably an obligation to comply with ISO and OHSAS standards for security, quality and the environment) to protect the life and health of its employees.

The CIS Group employees *shall* follow two basic rules: work in complete security and protect oneself at the same time as one's colleagues, community and the environment.

Safety also depends on strict adherence by each employee who operates a vehicle to applicable driving and road safety laws and regulations in force. All employees convicted of violations of driving or road safety regulations by a government authority will be personally responsible for this offence and personally sanctioned.

You *shall* know the laws and policies applicable to the CIS Group and comply with them, particularly if you have responsibilities in areas subject to safety and/or environmental regulations.

Similarly, use, possession or consumption of alcohol, narcotics and illicit drugs is strictly prohibited on the CIS Group premises and those of its Affiliates, as well as the sites of projects or during working hours. To this effect, and to the extent in the light of the functions, a state of inebriation could potentially put people or property in danger, the CIS Group reserves the right to ask for all drug and alcohol tests to be conducted on employees. It is also noted that many of our customers perform their own tests on the CIS Group employees at operating sites.

As a general rule, the CIS Group prohibits possession, use, distribution or consumption of alcohol or illicit substances during working hours or at places of work by all employees.

Moreover, to respond to these issues the CIS Group has the following policies: *Occupational Health and Safety Policy* (FR-01-POL-0003), *Health and Wellness Policy* (FR-01-POL-0006), *Psychoactive Substance Abuse Policy* (FR-01-POL-0007), *Road Safety Policy* (FR-01-POL-0009).

I was arrested by the police for speeding and must now pay a fine. As the vehicle I was driving was made available to me by the CIS Group and I was driving in connection with my professional activities, shouldn't the CIS Group pay the fine on my behalf?

It is the responsibility of every employee to strictly adhere to rules and regulations governing driving and road safety. In consequence, drivers fined for violating such regulations must be personally responsible vis-à-vis the relevant authorities, and even if the vehicle driven has been provided by the CIS Group, and even for the purpose of the needs of the CIS Group or in connection with their function or for the purpose of going to work. The CIS Group shall under no pretext be held liable for non-compliance by one of its employees with applicable laws and regulations and firmly condemns such behaviour.

With respect to alcohol consumption, what sanctions will I be subject to if I test positive at a site or my place of work?

The CIS Group applies a zero-tolerance in the area of the consumption of alcohol and illicit substances. In consequence, any employee under the influence of alcohol or drugs at his/her place of work will be immediately excluded from the project or place of work and subject to a disciplinary sanction that may go as far as dismissal for serious misconduct.

For ethical reporting, please refer to the *Ethical Situation Alert* (FR-31-CHR-0004) or contact cis.ethics@laposte.net.