

Jeumont Electric Code of Conduct

1. Follow some basic founding principles

Jeumont Electric adheres to:

- ❖ the principles of the Universal Human Rights Declaration;
- ❖ the fundamental agreements of the International Labour Organization;
- ❖ OCDE guidelines for multinationals;
- ❖ the principles of the United Nations Global Compact.

2. Abide by the law and regulations

Jeumont Electric and its employees abide by current laws and regulations. Certain fields warrant particularly close attention and strict adhesion:

2.1. Anti-corruption laws:

In all the countries in which it operates, Jeumont Electric is fully committed to combating corruption in all its forms. It expects all its employees to abide by the laws in force in the country in which they work, not to accept or offer bribes in the form of monies, gifts or services or any other benefits, either directly or indirectly, in the exercise of their functions, from or to civil servants, politicians, political parties or other natural persons or legal entities, with the sole aim of ensuring that they perform or do not perform something as part of their functions.

The following in particular are proscribed:

- ⊕ active acts of corruption: these may be situations where an undue benefit (money, gift or service, etc.) is offered or promised to a public servant or other person in return for his/her performing or not performing an act that is within the scope of or facilitated by his/her functions or mandate;
- ⊕ acts of passive corruption: these are situations in which a public agent or individual requests or accepts offers or promises of money, gifts, services or benefits to perform or not to perform an act that falls within the scope of or is facilitated by his/her function or mandate.

The penalties for corruption are the same, whether it is "direct" or "indirect" i.e. performed by third parties acting on behalf of firms or individuals.

The penalties for firms and individuals may be civil and penal and may be in the form of a substantial fine or even imprisonment.

Furthermore, acts of corruption committed in one country may lead to civil or penal actions not only in that country but in another country on account of the extraterritorial application of certain rules.

Finally, acts of corruption also expose those who commit them, and firms in particular, to highly adverse effects on their trade (loss of contracts) and on their reputation and image.

2.2. Agreements and arrangements with competitors

Any breach of antitrust and competition law is liable to incur a fine or payment of damages by Jeumont Electric and by the individuals involved. Furthermore, in certain countries, serious violations of the law such as illegal price-fixing agreements or volume allocation between competitors are punishable by prison sentences. Competition and anti-trust activity-related issues may not only result from contacts between Jeumont Electric and its competitors but also its relations with its suppliers and its clients.

In any contacts with competitors, the following subjects must never be raised:

- ✦ prices, margins, price-fixing methods;
- ✦ allocation of volumes;
- ✦ agreements or contracts in place with suppliers or clients.

2.3. Intellectual property rights

The intellectual property rights of Jeumont Electric include in particular its patents, know-how, manufacturing secrets, registered trademarks, industrial designs and copyrights. They are part of our assets and Jeumont Electric and its employees have a duty to protect them, both by law where this is possible, and by taking the necessary practical measures. Likewise, Jeumont Electric and its employees have an obligation to respect the intellectual property rights of others. These duties shall not cease if an employee ceases to be employed.

3. Third party relations

3.1. Clients

Jeumont Electric undertakes to supply its clients with quality products and services, constantly seeking to provide the highest added value for each utilization at a competitive price. Jeumont Electric is attentive to the needs of its clients and monitors, appraises and constantly strives to improve its products, services, technology and processes in order to ensure quality, safety and compliance with current standards.

Jeumont Electric undertakes to provide accurate information about its products and services in its advertising media or commercial proposals. Employees in contact with clients will ensure that these principles are abided by.

Confidential, sensitive or private information regarding clients must under no circumstances be divulged to third parties by an employee, unless he or she is explicitly permitted to do so.

Jeumont Electric undertakes to treat its clients equitably. Jeumont Electric reserves the right not to propose its services to any potential clients whose conduct is not in keeping with the Group's values and code of conduct.

3.2. Suppliers

Purchasing decisions are based on the objective evaluation of the reliability and integrity of suppliers and subcontractors, and on the attractiveness and competitiveness of their proposals, both with regard to a specific RFP and to long term considerations (strategic interests, control of supplier dependency).

To preserve the interests of Altawest, the purchase of goods and services is based on such criteria as price, quality, performance, lead time and fitness for purpose.

All measures must be taken to avoid conflict of interest and suspected partiality. Jeumont Electric requires that its suppliers and subcontractors strictly respect all legal provisions relating to their activities and their professional environment and reserves the right to exclude a supplier whose behaviour goes against Jeumont Electric's values and code of conduct.

The relationship between Jeumont Electric and its suppliers is also guided by the importance of taking each party's interests into consideration, with an emphasis on clarity and compliance with fair contract terms.

3.3. Commercial consultants and civil servants

Relations with commercial consultants must be established on terms that avoid any risk of corruption or illicit practices, as well as any possibility of Jeumont Electric's liability being incurred.

The term "consultant" includes any representative or consultant of a business consultancy firm, agent, sponsor or lobbyist who is directly or indirectly involved in the realization of a sale or project. It also designates any third parties such as lawyers, fiscal advisers, customs attorneys, engineers, financial consultants, working directly with clients or government or private authorities on behalf of Jeumont Electric.

Jeumont Electric may also use the services of commercial agents or liaise with public officers. The principles set out above with regard to abiding by the law and regulations are fully applicable to commercial agents and public officers.

3.4. Other

All employees must be attentive regarding payments received in order to detect any irregularities, in particular with partners whose business conduct may be suspect.

4. Respect for Jeumont Electric, its employees and their privacy

While Jeumont Electric expects its employees to show true professionalism in terms of their commitment and availability, this relationship must not become one-sided:

- ✦ Each employee has a private life and the right to keep it separate from their professional lives.
- ✦ Jeumont Electric prohibits any form of insidious pressure put on employees, either individually (such as moral or sexual harassment) or collectively (such as excessively long working hours).
- ✦ Jeumont Electric and its employees strive to ensure the advancement of each employee and colleague with regard to their careers and personal fulfilment.

Jeumont Electric prohibits any form of discrimination and strives to avoid excessive positive discrimination within the legal limits.

5. Safety

On the basis of the guidelines defining Group policy, Jeumont Electric undertakes to preserve the short, medium and long term health and safety of its employees and any other person working in relation to Jeumont Electric, that is to say assessing, preventing and monitoring all physical risks intrinsic to the work performed by Jeumont Electric.

All employees have a duty to report any dangerous situations they may witness, or incidents resulting from these situations, and to contribute to the implementation of preventive actions. Employees must strictly abide by the safety rules.

6. Social and environmental accountability

Jeumont Electric is anxious to contribute to the economic and social development of the countries in which it operates.

Jeumont Electric is attentive to the preservation of the environment and takes care not to harm local crops.

Jeumont Electric has adopted a policy of sustainable development, and thereby actively strives to respect crop growers and protect the environment.

Jeumont Electric expects all its employees to positively contribute to the ethical behaviour policy of which they are the vectors on an everyday basis. It therefore asks that they respect the values and principles of the Code of Conduct, and in particular to:

- ✦ comply strictly to the applicable laws and regulations;
- ✦ stringently implement all rules regarding the protection of the environment;

7. Internal control

Internal control provides all levels of management with reasonable assurance as to the good quality and reliability of financial and operational data, and compliance with legal provisions and the company rules in force.

The management of Jeumont Electric is responsible for its internal control. All employees are personally liable for the data they provide, including data entered into the computer systems.

8. Data distribution and protection

According to their responsibilities, employees may have access to confidential data regarding the company's business as well as clients and suppliers.

Confidential data includes in particular human resources and personal data, data regarding purchases or sales, products, technologies or orders, as well as data of a financial nature.

Any employee who is unsure if the data in his/her possession can be divulged or used must refer to his/her superior. The employees of Jeumont Electric shall remain bound by these obligations of discretion even after they have left.

All employees must in particular remember that:

- ⊕ An data put on the internet can be accessed by anyone, anywhere and for an unlimited time;
- ⊕ Their liability may be incurred regarding their publications via the internet.

Employees must take care never to discuss company business (on the phone or otherwise) in a public place without first ensuring that nobody is within earshot of them.

9. Conflict of Interests

An employee may find him or herself confronted with situations in which his/her personal interests or those of legal or physical entities to which he/she is connected or close to may be contradictory to the interests of Jeumont Electric. In such cases, he/she must take a conscientious stance based on the duty of loyalty he/she has towards Jeumont Electric and if in any doubt refer to his/her superior or the Legal Director of Jeumont Electric.

To avoid such situations of conflicting interests with Jeumont Electric arising, employees must avoid:

- ⊕ any collusion with a competitor, supplier or client, without the prior written permission of the management;
- ⊕ any professional activity outside Jeumont Electric without the prior written permission of the management; this concerns in particular employees with full time contracts.

10. Reducing paperwork

Paperwork has an adverse effect on collective efficiency and makes the work of each employee more arduous.

Jeumont Electric is anxious to only put in place processes or procedures when they are effectively necessary for the activity, for complying with current laws or its principles, or when they contribute positively to risk control or its performance.

This applies both to reporting practices and to operational processes and procedures.

Any intentions to create a new procedure must be assessed in light of the following criteria:

- ⊕ importance and relevance of the expected benefits in comparison to the additional effort or cost generated;
- ⊕ any pre-existing procedure having the same goal, and any changes to or elimination of superfluous items;

Any process or procedure must be designed to make its implementation as easy as possible and to be expressed in the most simple and brief manner possible.

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