



Trèves Ethics Charter TREVES Group

GENERAL DECLARATION

TREVES SAS, its subsidiaries and its joint ventures (the "TREVES Group" or "TREVES") adhere to the highest standards in the conduct of their activities, in particular with regard to respect for human rights, labor rights, environment and ethics.

Wherever TREVES Group is present, its entities takes full consideration of the local culture by respecting the values of the Group (**Commitment, Creativity, Control and Presence**), as well as those emerging from the present charter (the "Ethics Charter").

TREVES Group comply with laws and regulations, especially rules relating to free and fair competition, protection of personal data and prevention of all forms of corruption. Integrity, transparency, constant reevaluation, better performance through innovation and disciplined management are the constant inspiration of our behavior and actions.

This Ethics Charter defines the principles that shall apply at all times to our internal and external relations. It is supplemented by the other policies and internal rules applicable to the Group. These principles are not exhaustive but establish the basic rules of conduct and ethics applicable to all Group personnel and partners.

TREVES Group has signed the United Nations Global Compact (Global Compact) in 2004. As signatory, the Group has committed itself to respect and promote, in its business practices, a set of values and principles drawn from international texts and conventions on Human rights, labor and environmental standards.

The pursuit of the Group's values, the changes in the Group, the new requirements of our customers and new directions in corporate social responsibility and sustainable development led TREVES Group to develop this Ethics Charter. Each officer and employee of the Group must comply with this Charter and ensure its dissemination and compliance.

TREVES Group's ethics are based on the following 4 pillars:

- Human Rights (I)
- Employees' rights (II)
- Ethical Business Conduct (III)
- Respect of environment (IV)

I. Respect of Human rights

TREVES Group has decided for itself, as an inviolable rule, to exercise and develop its activities in compliance with:

- The laws and regulations (whether national or transnational) applicable in countries where its activities are exercised;
- The specific requirements established within the Group under this Ethics Charter and other internal regulations and procedures;

In particular, references are made hereto to the "Anti-Corruption Code of Conduct", the "Charter relating to the protection of personal data", the "Personal data retention policy", the "EU framework agreement", the "IT Charter" and the "competition Charter".

By signing the UN Global Compact, TREVES Group committed itself to respect and promote the fundamental rights enshrined in the Universal Declaration of Human Rights, like the dignity and worth of every human, the respect of employees' privacy and the equal rights between women and men. Group TREVES shall respect in particular the following principles defined in the UN Global Compact:



1. Child and forced labor

TREVES Group complies with national laws and regulations relating to child labor or any form of forced labor.

TREVES Group is committed to comply with:

- The Convention No. C138 of the International Labour Organization (ILO), in respect of the employment of persons under the age of 18 years;
- The Conventions Nos. 29 and 105 (Forced Labour Conventions) of the ILO.

2. Diversity and Inclusion

a) Employment of the people with disabilities

TREVES Group complies with national laws and regulations related to the employment of disabled persons and commits itself to undertake actions to promote their employment.

b) The fight against discrimination

TREVES Group complies with national laws and regulations applicable in the fight against discrimination.

No candidate can be excluded from a recruitment process or access to an internship or a period of training in business and no employee can be sanctioned, dismissed or subject to a discriminatory measure, whether directly or indirectly, particularly in terms of pay, training, ranking, classification, promotion, transfer or renewal of a contract, because of his origin, ancestry, fortune, philosophical convictions, gender, sexual orientation, age, marital status, genetic characteristics, political opinion, union activities, religious beliefs, physical appearance, health problems, physical disabilities, pregnancy, family name, or his membership or non membership, whether real or supposed, of an ethnic group, nation or race.

No employee can be punished, dismissed or subjected to a discriminatory measure for having denounced or reported in good faith, the actions listed hereinabove.

3. Sexual and Moral Harassment

Each employee has the right to work in a healthy environment, free from all harassment constituting wrongful behavior under applicable national laws and regulations in countries.

TREVES Group specifically prohibits all behavior constituting sexual or moral harassment, whether or not such behavior falls within the scope of a hierarchy or relation of subordination. Conduct is notably constitutive of illegal and prohibited sexual or moral harassment when:

- The acceptance of such conduct is made, either implicitly or explicitly, a condition of employment of a person;
- A decision affecting employment is motivated by the acceptance or rejection of such conduct;
- Such conduct has the purpose or effect to affect substantially the work performance of a person or creating an intimidating, hostile or offensive working environment.

4. Health and Safety at Work

TREVES Group is committed to implementing a health and safety action that aims to provide a safe and healthy workplace for every employee, in particular work stations used for research, development, design, and product manufacturing.

TREVES Group encourages its partners to implement a structured health and safety approach in all countries everywhere.

5. Rights of Minorities and Indigenous People

In line with internationally recognized Human Rights standards, TREVES Group will minimize, mitigate and remedy negative impacts on local communities related to its operations.



6. Land, forest and water rights and forced eviction

TREVES Group commits to the avoidance of forced eviction and the deprivation of land, forests and waters in its acquisition, development or other use of land, forests and waters.

7. Use of Security Forces

TREVES Group shall not commission or use private or public security forces to protect a business project if, due to a lack of training or control on the part of the company, the deployment of the security forces may lead to violations of human rights.

II. Human Resources

1. Freedom of expression and social dialogue

TREVES Group has committed itself to continuing the development of relationships of trust at all levels of the Group, notably by inviting its employees to speak freely to improve their working environment.

TREVES Group intends to maintain responsible social dialogue. To this end, TREVES Group keeps its employees and representatives well informed of its activities and organization, in compliance with applicable laws and regulations regarding the information and consultation of employees.

2. Development of the potential of each employee

TREVES Group promotes staff involvement in the following ways:

- Training and acquisition of multiple skills;
- Autonomy and responsibility;
- Contribution to continuous progress at all levels;
- Career prospects and fair pay.

3. Remuneration

TREVES Group is committed to ensure that remuneration is at least equal to the minimum amount mandated by law and/or the guaranteed minimum for the profession or as set forth in the relevant collective bargaining agreements. TREVES Group acknowledges the principle of equal pay for equally valued and productive work, in particular between men and women (ILO Convention n ° 100).

4. Working hours

TREVES Group undertakes to ensure that the total number of hours worked is equal to or less than the totals set forth in the national legislation and/or the collective-bargaining agreements in the country concerned. TREVES Group is committed to ensure that break times and periodic days off correspond at the very least to the minimum conditions set forth in the national legislation and/or the collective-bargaining agreements concerned.

5. Ethical recruiting

TREVES Group ensures that:

- Each new applicant will be treated fairly during the recruitment process;
- It will never confiscate, destroy, conceal, and/or deny access to worker passports and other government-issued identity documents;
- Any new employee will receive a written contract or employment notification at the start of his/her recruitment in a language well understood by him/her, stating in a truthful, clear manner his/her rights and responsibilities.



6. Respect of the employees privacy

Documents relating to the private life of employees, data on performance evaluations, promotion and compensation must be kept confidential. Access to such information is restricted to individuals duly authorized.

Computer facilities that collect and classify the data must have security systems in all circumstances to ensure the highest degree of confidentiality as possible.

Specific reference is made to Regulation of the European Union 2016/679 of the European Parliament and of the Council of April 27, 2016 (General Data Protection Regulation known as «GDPR») and of the amended law n ° 78-17 of January 6, 1978 relating to data processing, files and freedoms for France.

Reference is also made to the internal rules of TREVES Group and in particular to the “Charter relating to the protection of personal data”, to the “Personal data retention policy” and to the “TREVES Group EU data transfer framework agreement » regarding the transfer of data outside Europe.

Any difficulty relating to these principles and good law enforcement in this area must be signaled to the Group's General Counsel acting as Data Privacy Officer (DPO) to the following address : dpo_group@treves-group.com.

7. Conflict of Interest

A conflict of interest occurs when an employee or relative may personally benefit from a transaction involving an entity of TREVES Group or if an employee tries to conduct or have conducted a transaction with an entity in which he/she or a relative has a financial or other interest.

In case of doubt, the employee must refer to his/her superiors who will request the Group General Counsel to determine whether the proposed transaction creates a conflict of interest or not.

8. Confidentiality of documents and information within TREVES Group

TREVES Group protects its know-how and intellectual property and keeps confidential any information to which its employees have access while working for the Group.

In particular, information concerning the availability, terms and conditions of trade agreements and projects of the TREVES Group, financial data and other sensitive data, such as those relating to sales of production units, to intellectual property rights, technology, software or hardware in the activities of the Group is strictly confidential.

We have in place policies, internal procedures and contractual agreements with our partners and clients in order to protect our information, know-how and intellectual property.

TREVES Group will respect and protect the information and intellectual property rights of its partners and third parties.

III. Ethical Business Conduct

1 / Relations with clients, service providers or suppliers.

a / Gifts and entertainment of customers and / or providers

- It is forbidden to accept any gift or gratuity from customers or suppliers, of a substantial value and in any way exceeding 100 euros, in any form whatsoever (including but not limited to sums of money, material goods, services, entertainment, travel, etc).
- All gifts made or received as well as all invitations made or received must be declared in the register provided for this purpose.
- If a gift or an invitation for an amount greater than 100 euros reach their intended recipients, the gifts and invitation must be immediately returned to the giver or refused. If the refusal of the gift or its restitution may be considered discourteous, the beneficiary must inform the Group Human Resources Director and Group General Counsel who will decide the arrangements



to be made with respect to such gift in consonance with the ethical principles of the TREVES Group. The recipient must also ask the supplier or the customer to refrain from offering such gifts in the future.

- It is forbidden to pay any gratuity in cash, kind or other form including as entertainment or sponsorship, directly or indirectly, to any representative of a customer or supplier to obtain a contract or other commercial or financial benefit. In any event, gifts or favors of a substantial value and in any case of a value exceeding EUR 100 to customers or suppliers (whether current or potential) are strictly prohibited.

For more details, please refer to the Group Gifts and Invitation Policy [M08B(EN)].

b / Sourcing of goods and services

Selecting a supplier of goods or services for the TREVES Group must be based on quality, need, performance, time and cost. In negotiations with suppliers, it is the responsibility of each employee and officer of the TREVES Group to put the interests of the Group first within the limits of the law, to seize the best opportunities and get the best deal, without favoritism based on friendships or relationships on discriminatory criteria prohibited by this Charter.

c / Investments in suppliers

No employee or officer may invest directly or indirectly in the capital of a supplier having a business relationship with the TREVES Group, nor in its parent nor its subsidiaries, nor lend him money.

d / Purchase of any good or service from providers for personal use

Employees and managers shall not take advantage of their membership of the TREVES Group to obtain, for their personal purchases from a supplier of TREVES, the same conditions as those granted by the supplier to the TREVES Group.

2 / Respect of competition law

The TREVES Group strictly adheres to rules and laws of competition applicable in each state where the TREVES Group operates, bearing in mind that these rights prohibit such agreements, (formal or informal), plans, arrangements or coordinated behaviour between competitors regarding prices, territories, market share or customers.

Officers and employees of the TREVES Group accordingly refrain from entering into such agreements or understandings with competitors.

Furthermore, the involvement of Group employees in professional associations bringing together competitors requires the prior approval of the President and the Group General Counsel.

These principles are more fully detailed in the Group's Competition Charter.

3/ Intellectual Property and Counterfeits

The TREVES Group undertakes to respect intellectual and industrial property rights, and to comply with the rules of national and international law; it is prohibited from exploiting any trademark, patent, industrial design, or copyright by means of manufacturing, selling or using the property of a third party. TREVES Group never promote the use of counterfeit or imitation products

4/ Export controls and economic sanctions

TREVES Group complies with the national and international applicable laws and regulations that govern the importing and exporting of goods, services, technologies and information, including re-exports and parallel trade.

5/ Financial Accurate Records

The TREVES Group is committed to ensuring that all of its financial information is accurate and disclosed transparently.

The TREVES Group complies with all general accounting, tax and financial reporting rules, regulations and legal obligations applicable in the countries where we operate.

These financial documents are kept securely.





V / ETHICS TOWARDS THE ENVIRONMENT

The TREVES Group is engaged in a voluntary approach for the protection of the environment and stands up in defense of this principle in the conduct of its activities.

The TREVES Group continuously identifies new environmental risks and takes necessary measures to prevent or limit its effects.

TREVES conducts a program of continuous improvement so as to ensure that the reduction of the environmental impact of its sites, its activities and its products is placed at the heart of its approach.

TREVES ensures compliance with national, European and international environmental regulations and deploys appropriate systems of management and measures of performance.

1. Each employee of the TREVES Group shall read and understand and respect this Charter and if necessary, serve reminders of its rules and principles in the exercise of his functions and at the workplace. Group management and each entity shall specifically ensure the dissemination and enforcement of this Charter by TREVES Group employees.
2. Any employee of the TREVES Group questioning the conformity of its actions to this Charter is strongly encouraged to speak with his hierarchy, the Groupe Human Resources Director or the Group General Counsel to obtain more information on the conditions and application of the Ethics Charter.
3. All matters from an employee relating to the interpretation, scope and application of the Charter of Ethics will be forwarded to his hierarchy who will consult the Group Human Ressources Director or the General Counsel of the Group for a response.