

# Ethics and Compliance Charter



**ALTEN Group has built its development on a bedrock of fundamental principles of integrity and transparency. These principles are implemented by its management and employees in order to establish lasting relations of trust with its employees, personnel representation bodies, clients, shareholders, suppliers, competitors and all of its partners.**

Our international reach and our leadership in the Engineering and Technology Consultancy market places us in a position of responsibility vis-à-vis all those with whom we speak. It is for this reason that for some years now we have placed Ethics and Sustainable Development at the heart of our strategy, in order to ensure that we speak the same language and apply the same directives with a view to ensuring that the Group's values are observed.

I am convinced that no firm can last without trust, and that the reputation and integrity of our Group can be maintained only by continually reinforcing our Ethics.

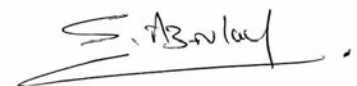
Accordingly, we have decided to create a bedrock of joint commitments, expressing our wish to observe and have others observe the principles governing the actions and conduct of each of our employees, throughout our whole sphere of influence, in all circumstances and in all countries in which we operate.

This Ethics & Compliance Charter formalizes our Group's commitment to pursuing and developing its activities with the strictest observance of national and international laws and regulations.

Moreover, to back the deployment of this Charter, I have decided to set in place an Ethics & Compliance Committee. Its members and I will actively see to the full application of our commitments and principles of conduct, and will manage the follow-up of all issues related to ethics and compliance within the Group.

It is through the exemplary nature of our conduct that we shall collectively contribute to our Group's sustainable growth and its performance.

Simon AZOULAY  
Chairman and Chief Executive Officer



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ALTEN Group wishes to meet the expectations of all its stakeholders, anticipate their requirements, and reconcile performance and responsibility.

**ALTEN Group undertakes to do so and observes:**

- the 10 principles of the United Nations [Global Compact](#);
- the United Nations [Universal Declaration of Human Rights](#);
- the various [International Labour Organization treaties](#);
- the [guiding principles of the OECD](#) applicable to multinationals.

The updating of the Ethics & Compliance Charter makes it possible to reaffirm ALTEN Group's fundamental convictions and ethics. It describes the principles that must guide the actions and conduct of every employee in all circumstances and in all countries.



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## Respect for the Group

ALTEN Group employees must be concerned for and stand guarantor for the quality of the Group's image and of the services provided by the Group. They must take care to project a positive and attractive image. This being so, they must on a daily basis avoid making any derogatory or critical comments that might adversely affect the Group or harm its reputation, especially through the use of communication tools accessible via the Internet.

## Honouring commercial relations

ALTEN Group undertakes to work honestly and fairly with all of its clients, providing them with quality products and services that meet their requirements, and providing them with accurate information concerning its products and services in the context of the provision of services.

Confidential, sensitive or private information concerning clients must not under any circumstances be disclosed to others, except where this is required or authorized in the context of a project or contract.

## Preventing corruption

In accordance with the principles of the UN Global Compact and those of the OECD, ALTEN Group is determined to banish all forms of corruption from its commercial transactions.

ALTEN Group undertakes not to offer, receive or provide, either directly or indirectly, any advantage of any kind, financial or otherwise, from or to a State representative or the representative of a political party, or from or to an employee or agent of a public or private sector client, or a lender or bank acting for such, with the sole aim of obtaining or maintaining a commercial transaction, or with a view to receiving any facility or favour whatsoever involving the breach of a regulation, on pain of criminal sanctions.

ALTEN Group acknowledges that invitations and gifts offered or received can sometimes contribute towards good business relations. However, invitations and gifts must remain within acceptable limits in terms of both customary usage and of the anticorruption legislation in force. In the same way, such invitations and gifts must never create obligations on the part of the receiving party vis-à-vis the party that offered them. The criteria for acceptance are very clearly defined by ALTEN Group, and the granting or receiving of gifts must systematically be consented to by the management, in total transparency.

At all events, requesting a gift or invitation, or any other advantage or benefit of any kind is prohibited.

## Handing on requirements to suppliers and subcontractors

ALTEN Group develops relations characterized by mutual cooperation with its suppliers, based on the principle of reciprocal loyalty.

ALTEN Group undertakes to take the interests of each of its suppliers and subcontractors into consideration, in a spirit of clarity, and in compliance with fair contractual terms.

In addition, ALTEN Group introduces measures to ensure that its suppliers and subcontractors observe the principal legal provisions applicable to their activities and their professional environment. In subscribing to the UN Global Compact, ALTEN Group undertakes to observe and promote within its sphere of influence the 10 universal principles regarding human rights and compliance with the labour standards in force and the provisions relating to protecting the environment and combating corruption. Consequently, in accordance with the principles set forth in its Responsible Purchasing Charter, ALTEN Group invites its suppliers and subcontractors to support this approach and comply with the provisions of the UN Global Compact and those of the International Labour Organization.

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## Handling export control measures

All ALTEN Group entities strictly observe the export control laws applicable in the countries in which they are established, in particular with respect to a dual civil and military application.

Employees involved in international trade operations will be responsible for ensuring that these operations observe the laws in force, if necessary requesting the assistance of their Legal Department and of the Managers responsible as regards Export Control.

## Prohibiting insider dealing

Every employee who, owing to their professional activity, possesses information that is not known to the general public and which, if disclosed, would be of such a kind as to influence the stock market price of either ALTEN's shares or those of another company, undertakes not to trade in these shares or recommend such to any third parties (either directly or via an intermediary), for as long as this information has not been made public by a person entitled to do so.

In addition, each employee in possession of such knowledge will be responsible for ensuring that it remains confidential. Any breach of the regulations relating to the possession or use of inside information is liable to lead to serious civil and criminal sanctions.

## Preventing conflicts of interest

Situations of such a kind as to affect an employee's performance or judgement, as likewise situations that give rise to a conflict between the interests of ALTEN Group and personal interests, or the interests of a relative, must be handled and discussed in a spirit of total transparency with the Management.

## Protecting data and assets

The ALTEN Group's intellectual property rights (patents, know-how, manufacturing secrets, registered trademarks, domain names, industrial concepts, copyrights, etc.) constitute its main assets and, as such, are protected by law, wherever this is possible.

ALTEN Group employees stand guarantor for the confidentiality of the information in their possession. They undertake not to disclose privileged, sensitive or confidential information outside the Group or to persons within the Group who are not entitled to have such information.

As ALTEN Group is listed on the stock exchange, employees are not authorized to speak in the name of the Group. Any intervention in the media, as likewise any initiative vis-à-vis investors or any of the Group's other external stakeholders, is subject to the Management's prior consent. In addition, employees must always be attentive to ensuring that their conversations do not breach confidentiality, especially conversations held in public places.

ALTEN Group prohibits the use of assets or privileged, sensitive or confidential information for personal ends or for professional ends that have been deflected from their initial objective. The same applies in respect of communication systems and IT tools made available to them for professional ends.

The ALTEN Group's IT Charter defines the rules concerning all use associated with IT services and resources made available to employees within the Group. This Charter, appended to the internal rules and regulations, lists employees' rights and obligations and underlines their responsibilities.

In addition, the ALTEN Group's Standard Information Systems Security Policy constitutes the referential for IT security and contains the rules of conduct applicable to all ALTEN Group employees in order to protect the security of information.

ALTEN Group employees are required to observe the principles set forth above even after they have left the Group.

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## Prohibiting agreements and understandings with competitors

ALTEN Group and its employees comply with French, European and international competition law and the law applicable in each of the countries in which the Group conducts its activity.

ALTEN Group and its employees abstain from directly or indirectly hindering freedom of competition in all commercial transactions. They also abstain from any unfair trading practices towards competitors, and from striking any unlawful deals.

## Respect for the environment

In accordance with the principles of the United Nations Global Compact, ALTEN Group undertakes to protect the environment:

- by reducing the impact of its direct activities on natural resources and biodiversity in a lasting way, and by promoting "green action" on the part of its employees;
- by guiding its clients in the development of innovative technological solutions that are favourable to the environment;
- by encouraging its employees to participate in responsible innovation.

The ALTEN Group's undertakings with regard to the environment are formalized in a public document that is distributed to all the Group's employees: the Sustainable Development Charter.

Each employee must observe and implement all the provisions of this Charter.



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## Governance and implementation

The ALTEN Group's Ethics & Compliance Charter is applicable to all its employees, in every country in which the Group operates.

The Charter is available in both French and English; it can be accessed by everyone on the ALTEN Group's website and intranets.

This document is also handed to all the Group's newly hired employees.

It is up to all the ALTEN Group's employees to know, observe and implement the principles governing actions and the rules of conduct set forth in the Charter.

The process of distributing the Charter is actively supported by the Management and the Board of Directors. In tandem with this, an Ethics & Compliance Committee has been set in place at global Group level. Its aim is to supervise the satisfactory distribution and application of this Charter, to respond to queries and to any reports of breaches by employees and if necessary to ensure that any necessary changes are made to the ethics and compliance policies that have been set in place.

## Procedure for reporting breaches

In the event of any query concerning the principles of this Ethics & Compliance Charter, every employee has a duty to ask their manager for any clarification and information that may be necessary.

If an employee considers that one of the rules of conduct stipulated in the Charter is not being observed, they must not hesitate to exercise the right to report it, by means of two systems:

- a dedicated email address: [ethics@alten.com](mailto:ethics@alten.com)
- a report form

The procedure for reporting breaches described in this Charter does not aim at assessing collective or individual situations (in particular, disciplinary processes), and/or situations related to labour regulation issues, which is ruled by similar but specific mechanisms, supervised, due to law, by the employee representative bodies.

Everything necessary will be implemented to preserve confidentiality with regard to an employee who exercises its right to report a breach. ALTEN Group undertakes to ensure that no employee suffers any negative consequences (discrimination, etc.) as a result of having had recourse to the above-mentioned systems or as a result of having provided information in good faith in the context of an investigation.

Regardless of the means used to send the report, its receipt will be confirmed in writing and the report will be processed within a maximum timeframe of two months.

