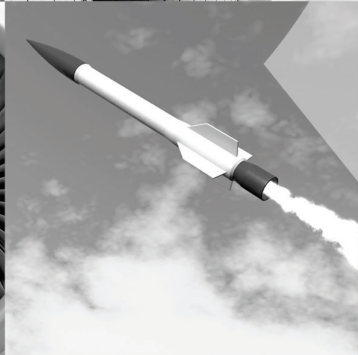
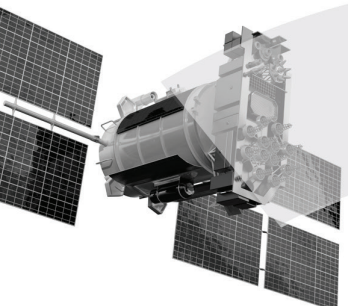




EXXELIA

At the heart of tomorrow's technologies,
transforming our daily lives and making them safer

OUR ETHICS CHARTER



PREAMBLE

SCOPE

This Charter applies to EXXELIA and all its subsidiaries worldwide. It concerns all our customers, suppliers, shareholders and, above all, we employees.

The Charter not only provides information but must be respected if it is to be fully effective. Its aim is to set out our undertakings with a view to making our business practice more equitable, fairer and a truer reflection of the values in which we believe.

HOW TO USE THIS CHARTER

This charter has been designed as a tool to empower you to exercise your rights within the company. Should you have any questions regarding our business practice, please refer to this Charter for advice on best conduct.

1. DOES A PRACTICE COMPLY WITH THE ETHICS CHARTER?

Check that the practice is not contrary to any of the provisions in this Charter.

2. IS IT LEGAL?

Check that the practice does not infringe a legal provision.

3. DOES IT MEET OUR ETHICAL PRINCIPLES (INTEGRITY, TRANSPARENCY, LOYALTY...)?

Check that the practice is not contrary to the principles that we strive to value at all times.

4. WHAT IS THE IMPACT OF MY WORK ON THE ENVIRONMENT?

Ask yourself questions about the implications of your action.

5. WOULD I BE COMFORTABLE IF MY DECISION WERE MADE PUBLIC INSIDE OR OUTSIDE THE COMPANY?

THE RIGHT ATTITUDE: TALK ABOUT IT

If you disagree with any of our business practices, do not hesitate to raise the issue! There are no barriers between you and higher management. Information must circulate as freely as possible and to enable this, all challenges are accepted.

We remind you that we have set up an Ethics and Compliance Committee through which anybody at EXXELIA may directly and anonymously contact one of the Committee members in the event of an unethical business practice arising.

Under the terms of the GDPR (legislation designed to protect all personal data), the group has appointed a DPO (Data Protection Officer) whose role is to be the dedicated contact person for all enquiries from inside or outside EXXELIA group concerning personal data protection issues. The DPO has control of internal data protection rules and checks that they are fully implemented. It is the DPO's responsibility to inform personnel of all new obligations, help decision-makers to appreciate the consequences of the processing of personal data, conduct an inventory, design initiatives to generate awareness and continuously ensure conformity. If in doubt about any of our business practices do not hesitate to raise the issue with the DPO.

UNDERTAKINGS TOWARDS OUR EXTERNAL PARTNERS

ANTICORRUPTION POLICY

Our external partners are required to behave in an ethical manner in all their professional relationships. More specifically, no gifts, invitations or direct advantages may be accepted from our external partners when the aim of these is to derive any form of advantage.

Moreover, EXXELIA combats all forms of lobbying and political support and, in so doing, affirms its independence. This implies refraining from making any donations to political parties or organizations closely affiliated to the latter and liable to influence any decision-making process.

CONFLICTS OF INTEREST

We combat conflicts of interest, both internally and externally; but what exactly is a conflict of interest? The term covers any practice liable to compromise the neutrality and impartiality with which the person in question fulfils their professional missions. These conflicts of interest may lead to infringements such as illegal taking of interest and favoritism.

FAIR COMPETITION

EXXELIA refrains from all manner of unfair competition. One such practice might be to take a measure to distort a market, i.e. by under- or over-pricing a product.

We select and treat all our suppliers equitably and without distinction.

COMPLIANCE WITH IMPORT / EXPORT LEGISLATION

We comply with the legislations in force regarding importation and exportation of goods and services. EXXELIA consequently submits to all checks and regulations on its products as and when required.

EXXELIA'S ETHICAL PRINCIPLES

Our values form the basis of our action and define our commitments. They enable us to develop and legitimate our business and the way we do it. These values are underpinned by principles of honesty, transparency, integrity, fairness and the protection of the most vulnerable.

More specifically, our action is based on our respect for international laws and conventions. We therefore comply with all regulations in force regarding Human Rights, notably the Charter of the United Nations, the European Convention on Human Rights, and the Universal Declaration of the Rights of Man and of the Citizen). Moreover, EXXELIA abides by the principles of the OECD, the ILO and the UN Global Compact.

Finally we guarantee that our actions best preserve the environment, health and safety as part of a sustainable long-term vision. We implement all appropriate procedures aimed at guaranteeing respect for the environment, health and safety.



RESPECT FOR CONFIDENTIALITY AND PROTECTION OF PERSONAL DATA

The confidential nature of relations with suppliers, customers and shareholders must be respected. We are careful to respect their image and interests as if they were our own.

EXXELIA also guarantees to protect personal data belonging to external partners. Personal data is to be understood as information (of any nature) directly or indirectly enabling the identification of a physical person or establishing a link with the person's function. The person has a right to check the ways in which such data is collected, processed, used and communicated. The person may also ensure that the data is used loyally for a precise, legitimate and explicit purpose and shall be destroyed as soon as the company has no further use for it.

EXXELIA employees are to show caution, responsibility and respect for third parties when using social media, even for their own personal purposes. They must avoid transmitting messages containing confidential information or that are the property of EXXELIA, or that might be considered insulting, offensive or degrading for individuals or the company. Moreover, they must in all cases comply with the regulations relative to the protection of personal data when publishing photos of individuals or groups.

CONTRACTS

We undertake to provide contracts that are totally transparent in order to facilitate our commercial relations.

If in doubt, do not hesitate to systematically refer any type of contract (i.e. sales, framework agreement, supplier contract...) to our Legal Department for approval.

FINANCIAL OPERATIONS AND TRANSACTIONS

Regarding financial operations and transactions (i.e. any movement of moneys), EXXELIA complies with the legislation and regulations in force. It also remains particularly vigilant with regard to these operations.

We effectively implement all the requisite and appropriate mechanisms to combat fraudulent use of payment methods.



UNDERTAKINGS TOWARDS OUR PERSONNEL

PRINCIPLE OF GOOD FAITH AND LOYALTY

Our co-workers are expected to fulfil their responsibilities in good faith and loyalty. This consequently includes avoiding all conflicts of interest with the group.

Personnel are reminded that conflicts of interest arise when individuals take decisions in their own interest but that are contrary to those of the group. Moreover, co-workers are not entitled to use company property for their own purposes.

Also, the EXXELIA company logo and graphics charter are to be used solely for predefined document types (technical documents, customer presentations, etc.).

If in doubt, do not hesitate to refer to management as appropriate.

RESPECT THE HEALTH AND SAFETY OF CO-WORKERS

EXXELIA undertakes to take all necessary measures to protect the health and safety of its employees at their work place. We also implement all appropriate measures to preserve the environment.

RESPECT TEAMWORK

Because high-quality products can only be delivered when they are made in optimal working conditions, EXXELIA attaches particular importance to teamwork, of which there are many aspects.

Firstly, EXXELIA group combats all forms of slavery and human trafficking. This concern is also embodied in the fact that, though employees are expected to comply with the work instructions they have received, no individuals may be psychologically or physically coerced into accepting a task.

Employee compensation is based on skills, contribution to the company and performance. EXXELIA undertakes to outlaw all differentiation between salaries on the basis of gender and to reduce any existing discrepancies.

Employee harassment (in any form whatsoever) or discrimination against a member of personnel is also prohibited in compliance with the legal provisions in force.

Members of personnel are free to choose whether or not they wish to join a trade union.





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