



CODE OF CONDUCT

AKKA TECHNOLOGIES Group

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PREAMBLE

The growth and international expansion of the AKKA Technologies Group have increased the need for a common framework that defines the rules of ethical and moral conduct and reduces the risk of infringement of laws and regulations within the countries where we operate.

The objective of this Code of Conduct is equally to share the company's values amongst all employees, managers and partners (shareholders, suppliers, clients, etc.) of the AKKA Technologies Group.

Maurice Ricci

Chairman of the Board & Group CEO - AKKA Technologies Group

SCOPE

This Code is a code of business and ethical conduct which applies to all employees of the AKKA Technologies Group, at all levels in the hierarchy, including in the subsidiaries in which the Group holds a majority stake. The companies in which the AKKA Technologies Group holds a stake but not a controlling interest are encouraged to apply this Code. Third parties such as external consultants and independent partners must comply with and adhere to this Code when acting on behalf of the AKKA Technologies Group.

CORPORATE CULTURE

CORPORATE VALUES

The corporate values of the AKKA Technologies Group set the direction for our everyday actions and are intended to guide employees in their work.

RESPECT

We believe that diversity is an advantage and we respect every individual in their working environment, irrespective of gender, nationality, ethnicity and beliefs.

We consider that collaboration is the way to improve the quality of our work and we treat all our colleagues, clients, suppliers and other business partners with the utmost respect.

AMBITION

As our aim is to be a benchmark company in our sector, we are constantly seeking to surpass ourselves and we regard the challenges we face as a means of improving the services provided to our clients and enhancing our skills.

COURAGE

We make every effort to provide excellence to our clients by showing personal courage. We regard obstacles as an opportunity to seek innovative solutions with tenacity and determination.

PRINCIPLES OF GOOD CONDUCT

AKKA Technologies Group employees are encouraged to promote a positive corporate culture with a focus on confidence, respect, fairness and tolerance. Such a culture allows subjects and problems to be approached in an open, factual manner, by accepting different opinions and objectively seeking the best solution for the stakeholders. >>>

CORPORATE CULTURE

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RESPONSIBILITY OF THE EMPLOYEE

Employees shall demonstrate integrity in all their business dealings and strive to implement the Group's values and principles of good conduct.

The behaviour of managers shall be exemplary in terms of integrity. The actions of our managers and employees shall be governed by tolerance and fairness. This enables co-operation on a collaborative basis and creates a working environment that favours the exchange of information and ideas in a way that is open to diversity and respects everyone's individual personality and dignity.

PROTECTION OF ASSETS

Employees must treat the Group's property and resources with the greatest care and consideration. In particular, the Group's property and resources include all intellectual property (know-how, software, patents, brands, etc.), equipment, workplace facilities and tools, the Group's financial resources and any other information of whatever type (technical, commercial, financial, social or otherwise).

These must not be used in an incorrect or unauthorised manner or diverted for non-business purposes. The expertise and know-how of the AKKA Technologies Group are fundamental. As a consequence they must be protected against any use contrary to the Group's interests.

COMPLIANCE WITH RULES AND REGULATIONS

COMPLIANCE WITH LAWS, REGULATIONS AND INTERNAL RULES

Employees must comply with all national and international laws and regulations applicable to their field of activity. Managers shall ensure that this principle is applied within their area of responsibility.

COMPLIANCE WITH THE UN GLOBAL COMPACT

The AKKA Technologies Group commits to support and promote the United Nations Global Compact.

The UN Global Compact contains universally accepted principles relating to Human Rights, working conditions, environmental protection and fight against corruption.

HUMAN RIGHTS

Businesses are expected to promote and respect the protection of international law relating to Human Rights and to make sure that their companies are not party to any Human Rights violations.

LABOUR

Businesses are expected to uphold the freedom of association and recognise the right to collective bargaining, to eliminate all forms of forced and compulsory labour, to abolish child labour and to eliminate discrimination in respect of employment.

ENVIRONMENT

Businesses are expected to implement the precautionary principle with respect to problems affecting the environment, to undertake initiatives to promote greater environmental responsibility and to encourage the development and spreading of environmentally friendly technologies.

ANTI-CORRUPTION

Businesses are expected to act against corruption in all its forms, including in particular extortion and bribery.

RELATIONSHIPS WITH PARTNERS OF THE AKKA TECHNOLOGIES GROUP

CONDEMNATION OF CORRUPTION

The AKKA Technologies Group is recognised in the market for the quality of its products and services. All business is obtained in an entirely legal manner and in accordance with the Group's ethical principles. The AKKA Technologies Group does not tolerate any form of corruption, including extortion and bribery, in its relationships with its partners.

In the context of their daily work, all employees must be vigilant to avoid any attempt at undue influence.

CONFLICT OF INTERESTS

PERSONAL INTERESTS AND THE INTERESTS OF THE GROUP

Decisions made by the AKKA Technologies Group are based on objective, transparent criteria, such as quality, performance and price.

A conflict of interests is a situation where personal interests and the company's interests are incompatible or where judgement is influenced by personal interests. Therefore, any situation which could give rise to a conflict of interests must be avoided.

BENEFITS

A conflict of interests can arise where private interests influence or could influence an employee's business decisions. For this reason, any benefits such as gifts, invitations to a meal or an entertainment from an external partner may be accepted if:

- > The employee is not seeking to obtain personal benefit as a result of his or her position.
- > A benefit may not be accepted or bestowed if there is a risk of influence as a result.
- > Any gift or invitation from a business partner may be accepted if it is offered voluntarily in a business context or if its value is reasonable in the given context. In order to assess whether a gift or an invitation is appropriate or not, it is necessary to consider the overall conditions surrounding each situation. In any event, gifts or invitations must not be recurring.

In cases of doubt as to whether there is a conflict of interests employees should first consult their line manager who will help find an acceptable, transparent solution. >>>

RELATIONSHIPS WITH PARTNERS OF THE AKKA TECHNOLOGIES GROUP



FAIR COMPETITION

The AKKA Technologies Group shows respect and confidence towards its partners. Consequently, the AKKA Technologies Group defends fair competition in the market and opposes any behaviour tending to restrict competition in any form whatsoever.

CONFIDENTIAL INFORMATION

Confidential information, in particular information relating to inventions, developments and new products, innovations and know-how, is of great value. The AKKA Technologies Group regards all business-related information as confidential and does not share it without formal authorisation.

Employees of the AKKA Technologies Group respect the confidential nature of the information entrusted to them by partners, clients or suppliers.

Confidential information belonging to the AKKA Technologies Group, like that entrusted to it by its partners, must be protected against any unauthorised access and handled in accordance with the laws and regulations of the countries in which we operate.

IMPLEMENTATION OF THE CODE OF CONDUCT

The Code of Conduct cannot cover all the everyday situations that employees may encounter. Instead the Code provides all employees with a framework in which they can find the principles of an ethical and moral behaviour.

All employees must familiarise themselves with the Code and act in accordance with it.

Line managers are the first people to consult with regard to any questions relating to application of the Code of Conduct.

The AKKA Technologies Group Internal Control Department may also be consulted.

Non-compliance with the Code will be regarded as a default and may be penalized in accordance with the rules applicable in the countries where we operate.



21, rue Antonin Laborde - CS 60624
69009 Lyon Cedex 09
Tel : 04 72 54 99 99 - Fax : 04 72 54 98 64

9-11, rue Montalivet
75008 Paris
Tel : 01 56 69 26 59 - Fax : 01 56 69 26 50