



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, labour rights, the environment and ethics. Wherever the TREVES Group is present, its entities assimilate the local culture while fully respecting the values of the Group (**Commitment, Creativity, Control and Presence**), as well as those which emerge from this Charter.

The TREVES Group respects laws and regulations, especially rules relating to free and fair competition, the protection of personal data and the 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 our actions.

This Ethics Charter defines the principles that should 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 as part of the responsibilities of the Group's employees, they establish the basic rules of conduct and ethics applicable to all personnel of the Group and its partners.

The TREVES Group has signed the United Nations Global Compact (Global Compact) in 2004. As a 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, labour standards 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 the TREVES Group to develop this Charter of Ethics. Each officer and employee of the Group must comply with this Charter and ensure its dissemination and compliance.

Treves Group's ethic is based on the following 4 pillars :

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



I / RESPECT FOR HUMAN RIGHTS

TREVES 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 these activities are exercised,
- the specific requirements established within the Group under this Ethics Charter and other internal regulations and procedures,
- In particular, reference is made here 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 to the Global Compact of the UN, the TREVES Group has committed itself to respect and promote the fundamental rights enshrined in the Universal Declaration of Human Rights, the dignity and worth of the human person, the privacy of employees and the equal rights of women and men. The Group TREVES shall, in particular, respect the following principles defined in the UN Global Compact:

1 / Child and forced labor

The TREVES Group complies with national laws and regulations relating to child labor or any form of forced labour and, in any case:

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

2 / Diversity and Inclusion

a) employment of the disabled

The 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

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

Further, no candidate may be excluded from a recruitment process or access to an internship or a period of training in business and no employee may 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



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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 may 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

Any 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 where the TREVES Group operates.

The 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, or
- A decision affecting employment is motivated by the acceptance or rejection of such conduct, or
- Such conduct has the purpose or effect of substantially affecting the performance by the individual of his work or creating an intimidating, hostile or offensive working environment.

4/ Health and Safety at Work

The 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 where they operate.

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.



II / HUMAN RESOURCES

1/ Freedom of expression and social dialogue

The 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.

The TREVES Group intends to maintain responsible social dialogue. To this end, the 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

The TREVES Group promotes staff involvement in the following ways:

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

3/ Remuneration

The supplier 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. The supplier 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

The supplier 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. The supplier 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

The Treves Group ensures that:

- Each new applicant will be treated fairly during the recruitment process;



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- 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 duly authorized individuals.

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

Consequently, each employee must protect the confidentiality of such information in respect of himself, and he is forbidden to seek such data for other employees unless such searches have been authorized as part of its mission. Other than authorized persons, employees may have access only to such information in this regard to which a they have a right of access under the applicable law.

Specific reference is made here 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 the TREVES Group in this area 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).

7/ Conflict of Interest

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

If in doubt, the employee must refer to his 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

The 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.



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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.

The 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



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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 au Groupe TREVES.

2 / Respect of competition law

The TREVES Group strictly adheres to rules and laws of competition applicable in the European Union and 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 Chief Executive of the Group 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 Group General Counsel to obtain more information on the conditions and application of the Ethics Charter.
3. All matters from and 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 General Counsel of the Group for a response.