

# ETHICS CHARTER

## ALTEN Group



ALLEN

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## Message from the CEO

**Since its creation in 1988, the ALTEN Group has established itself as a world leader in the field of engineering and IT services, supporting its customers' development strategies.**

Our corporate culture is based on the key values and principles of integrity and transparency. They are at the very heart of our corporate strategy, enabling us to build lasting relationships with all our stakeholders.

Our excellent reputation can only be maintained by acting in the strictest compliance with the laws and ethical standards. This is why our Ethics Charter is intended to describe the principles of action that should inspire everyone's behaviour under all circumstances and in all the countries in which we operate. Updating this Charter is an opportunity to reaffirm our commitment to the ethical approach that we have consistently pursued for many years now.

Each of us, whatever our position in the hierarchy or level of responsibility, must act responsibly and in accordance with the requirements of this Charter by:

- putting the principles of the Ethics Charter into practice on a daily basis;
- inculcating a culture of ethical awareness in our teams;
- encouraging the flagging of ethical concerns;
- reporting any conduct that may violate our ethical principles.

Ethics is everyone's business; I am convinced that the actions of each and every one of us contribute to making our approach effective and sustainable, enabling us to consolidate our position as a key player in the world of IT engineering and services.

Together with the Executive Committee, I affirm our commitment to maintaining the highest ethical standards. We are counting on your active engagement and vigilance.

**Simon AZOULAY**  
**CEO**

# I. FOREWORD

## The values of the ALTEN Group

**Our corporate culture is based on key values. These guide our day-to-day actions.**



### Engineering culture

Our teams share the same sense of belonging to a technological environment based on creativity, innovation and the quest for solutions.



### Sustainable growth

Thanks to the quality of our management, of our teams and our rigorous approach to running our business activities, we are a financially solid company that honours its commitments.

**ALTEN**



### Human capital development

Nurturing talent, facilitating individual development, building expertise and acting as a springboard into the future are among our fundamental commitments.

# Ethics and compliance governance in the ALTEN Group

An organisation dedicated to ethics and compliance.



## II. ETHICS CHARTER

The Ethics Charter sets out the ethical principles applicable within our Group and is designed to guide us in the day-to-day application of the Group's values. It describes the Group's guiding principles and illustrates them so that everyone can apply these under all circumstances.

The Ethics Charter is addressed at all the Group's directors, managers and employees, regardless of the country or legal entity concerned. We also ensure that our partners (suppliers, subcontractors, partners, etc.) are aware of our ethical commitments, and we expect them to align themselves with our ethical approach and to share and respect the guiding principles set forth in the ALTEN Ethics Charter.

Available in several languages, our Ethics Charter is accessible to everyone on our various internet and intranet sites. It is also presented to all new employees, managers and directors when they first join the Group.

Obviously, the Ethics Charter cannot cover all situations likely to raise ethical questions in the context of our business activities. **It follows that each and every one of us needs to be discerning and ask ourselves the following questions before making any decisions:**



If I have answered **NO** to any of these questions or if I have any doubts, I should consult my Manager, my Ethics & Compliance ambassador or the Compliance Department ([compliance@alten.com](mailto:compliance@alten.com)). They will advise me on the right course of action. I can also report this problem on the Group's whistleblowing system: ALTEN Integrity Line.

It is up to each and every one of us to **know, understand, respect and apply the ethical principles** set out in the Ethics Charter.

# Employee health and safety

**We must be familiar with and comply with the ALTEN Group's health and safety rules. The same applies to those of our customers when we are on mission.**

## Compliant conduct

- I know, understand and comply with health and safety rules.
- I apply these rules on a daily basis.
- As a manager, I ensure that employees comply strictly with these rules.

## Practical Example

**Q. I'm on a mission at a customer's production site. What do I need to do before the mission starts?**

**A.** I am aware of the health and safety measures applicable to this customer. If the mission requires protective equipment, I should make sure that my Manager has provided me with this.



### Communication is the key

If I am faced with a problem relating to the health or safety of employees, I discuss it with my Manager or my HSE Advisor.

# Diversity, inclusion and non-discrimination

We offer equal employment and career opportunities to all, regardless of age, gender, religion, nationality, marital status, health, disability or any other factor.

## Compliant conduct

- I treat everyone with respect and never behave in a discriminatory or offensive manner.
- I value each individual's experience and give everyone the same opportunities for development.
- I assess each individual on the basis of their respective skills and professional achievements.

## Practical Example

**Q. As a manager, how can I ensure that the principles of diversity and inclusion are respected in my team on a day-to-day basis?**

**A.** I always assess my employees equally and fairly, solely on the basis of their merits and achievements in relation to their professional skills and performance.



### Communication is the key

If I encounter a problem relating to diversity, inclusion or non-discrimination, I discuss it with my Manager or HR Manager.



# Preventing harassment

We do not tolerate any form of harassment or intimidation, whether sexual, physical or psychological. Inappropriate gestures and abusive, racist, discriminatory, sexist or sexual comments or conduct are strictly prohibited.

## Compliant conduct

- I treat everyone with respect and do not tolerate any form of harassment.

## Practical Example

**Q.** I witnessed what seemed to me to be inappropriate conduct where an employee made offensive comments about one of my colleagues. What should I do?

**A.** I immediately contact my manager to inform him/her of the situation that I witnessed or I follow the whistleblowing process. If the facts of the case are proven, measures will be taken to put a stop to this behaviour.



### Communication is the key

If I encounter a problem relating to harassment, I discuss it with my Manager or HR Manager.

# Protection of intellectual property and know-how

We strictly respect the intellectual property rights (patents, trade secrets, brands, etc.) and know-how of our customers, partners and, more generally, third parties.

We endeavour to always protect the Group's intangible assets (patents, know-how, brands, etc.).

## Compliant conduct

- I respect intellectual property and only use works for which I have the necessary authorizations and in strict compliance with the latter.
- I use the Group's assets only for business purposes and after obtaining the necessary internal authorizations. In all cases, I respect the Group's policies.

## Practical Example

**Q. I would like to use a customer's logo in one of my sales presentations. Can I do this?**

**A.** No, I must obtain prior authorization from the customer before using its logo.



### Communication is the key

If I have any doubts about the use of a work or intellectual property rights, I inform my Manager and contact my legal department.

# Compliance with data and information protection and security rules

We comply with all the rules governing the protection and security of data and information, both internally and for our customers and partners.

## Compliant conduct

- I know, understand and comply with all the Group's policies on data and information protection and security.
- I complete the Group's mandatory training courses on information protection and security.
- I protect and preserve the confidentiality of the data/information to which I have access (whether it is the property of ALTEN or its customers).
- I respect the protection and security policies of our customers and partners.
- I do not collect, copy or transfer any data/information to which I have access in the course of my duties, whatever the medium used (USB stick, external hard drive, e-mail transfer, etc.).
- I respect the obligation to internally classify data according to the level of confidentiality (C0, C1, C2, C3).

## Practical Example

**Q. In connection with my work, I would like to keep some of the data to which I have access or on which I have worked. Can I do this?**

**A.** It is strictly prohibited to collect, copy or transfer data/information to which I have access in the course of my work, regardless of the medium used (USB key, external hard drive, e-mail transfer, etc.).



### Communication is the key

If I encounter a problem relating to the protection and security of data and information, I discuss it with my Manager or the CISO (CISO@alten.com).

**We respect privacy and protect personal data. We comply strictly with all applicable local laws and regulations.**

### Compliant conduct

- I know, understand and respect the Group's policies on data privacy.
- I complete the Group's mandatory training activities on data privacy.
- I only collect and process personal data in strict compliance with applicable legislation and Group's policies and after obtaining the necessary internal authorizations.
- I maintain the strict confidentiality of personal data.

### Practical Example

**Q. I'm on a mission on a client's premises and I get access to the e-mail addresses of trainees. Can I pass on these e-mail addresses to the recruitment managers so that they can include them in the candidate database?**

**A.** No, it is strictly forbidden to collect or communicate personal data to which I may gain access in the course of my work for a client.



### Communication is the key

If I have any questions about data privacy, I discuss it with my DPO or my local Data Privacy Advisor.

# Financial and non-financial communication

We apply the utmost rigour to our accounts and ensure that we communicate in good faith accurate financial and non-financial information.

## Compliant conduct

- I know, understand and respect the Group's policy and act in accordance with local laws and regulations.
- I do not disclose any financial information without prior authorization.
- I check the accuracy of the accounting, financial and non-financial information provided in the Group's official documents.

## Practical Example

**Q. I am preparing an internal communication and I would like to include financial and non-financial information about the Group. I've found some relevant information on the internet. Can I use this?**

**A.** No, I must systematically contact the departments responsible for the compilation of the information I wish to use in order to obtain authorization for the communication of this information and to check that it is reliable and up to date.



### Communication is the key

If I have a question about the use or disclosure of financial or non-financial information, I can contact the Financial department, CSR department or Group Legal department as appropriate.

## Stock market regulations

**We comply with stock market regulations, in particular with regard to insider information and insider trading.**

### Compliant conduct

- I maintain the confidentiality of sensitive or privileged information.
- I ensure that I am not in possession of sensitive or privileged information before carrying out a transaction in ALTEN securities.
- I know, understand and comply with all internal rules relating to stock market regulations and in particular the ALTEN Stock Trading Code of Conduct.

### Practical Example

**Q. In connection with my duties, I am informed about the Group's half-year results before they are published. I would like to buy shares before the information is made public. Is this possible?**

**A.** No, I cannot trade in ALTEN shares until the information that I hold (the half-yearly financial results) has been made public by ALTEN. I must also maintain the strict confidentiality of the information that I hold and refrain from advising third parties to trade in ALTEN shares during this period.



#### Communication is the key

If I have a question about stock market ethics, I can contact the Corporate Section of the Group Legal Department.

# Conflicts of interest

**We must act objectively in the performance of our duties and avoid any situation in which our personal interests are likely to conflict with those of the ALTEN Group.**

## Compliant conduct

- I do my utmost to protect the interests of the ALTEN Group in the course of my professional duties.
- I know, understand and respect the Group's policy on conflicts of interest.
- I inform my manager or the Compliance Department as soon as possible of any potential or proven conflict of interest concerning me.

## Practical Example

**Q. As a buyer, I'm in charge of a call for tenders. I received a reply from a close relative of mine who works for an interested company. Should I flag this situation?**

**A.** Yes, this situation creates a conflict of interest. I have to inform my Manager. The latter will decide on the preventive measures to be put in place, such as organizing collegiate governance of the call for tenders or removing me from the key phases of supplier selection or commercial negotiation.



### Communication is the key

If I have a problem relating to a conflict of interest, I discuss it with my Manager or the Compliance Department.

## Fighting corruption

We apply a 'zero tolerance' policy towards all forms of corruption and influence peddling and act in accordance with the national and international standards applicable to us.

We only deal with counterparties who respect our rules of integrity, our values and our principles of action.

### Compliant conduct

- I do not commit any acts of corruption.
- I know, understand and respect the ALTEN anti-corruption code of conduct.
- I complete the Group's compulsory anti-corruption training course.
- I ensure that the necessary checks are carried out before entering into any business relationship.

### Practical Example

**Q. As part of a tender process, I am solicited by a client's employee : he promises that I will be awarded the contract if I invite him to an international sporting event over several days, all-expenses-paid. Should I accept the request?**

**A.** Inviting a client's employee to an event in order to obtain a contract constitutes an act of corruption. He is seeking a personal advantage in exchange for the award of the contract. This is a conditional invitation prohibited by Group's policy. I do not respond to his request and immediately follow the internal reporting process.



### Communication is the key

If I encounter a situation that could constitute an act of corruption, I discuss it with my Manager, my Ethics and Compliance Ambassador or the Compliance Department.



## Gifts and invitations

**We are extremely vigilant about our business relationships. We refrain from attempting to influence business decisions by means of gifts, invitations or advantages of any kind.**

### Compliant conduct

- I know, understand and respect ALTEN gifts and hospitality policy.
- I complete the Group's compulsory anti-corruption training course.
- I do not attempt to influence business decisions by means of gifts, invitations or benefits of any kind.
- Before accepting any gift or invitation, I consult ALTEN's policy and that of the counterparty.
- I declare any gifts or invitations received in accordance with ALTEN rules.

### Practical Example

**Q. For the festive season, I'd like to give a scarf to a client to thank her for her cooperation on a complex project. What should I do?**

**A.** I need to check the gifts and hospitality policy of ALTEN and of the client. If both policies authorize gifts, I must ensure that the value of the scarf does not exceed the threshold set in these policies, and then ask my manager for authorization.



#### Communication is the key

If I have any doubts or questions about offering or accepting gifts and hospitality, I discuss it with my Manager, my Ethics and Compliance Ambassador or the Compliance Department.

# International sanctions and embargoes

We conduct our business activities in strict compliance with national and international economic and financial sanctions regimes. We also comply with embargoes.

## Compliant conduct

- I know, understand and respect the Group's policy, in particular the "Ethics and Compliance in a nutshell" Handbook.
- I comply with local and international laws and regulations.
- I am vigilant and carry out the necessary checks before entering into any business relationship.
- I consult the Compliance Department if I have any doubts about a business relationship.

## Practical Example

**Q. I would like to enter into a business relationship with a new counterparty. What should I do?**

**A.** I must refer to the guidelines issued by the Group before entering into any business relationship and have the counterparty verified.



### Communication is the key

If I have a problem relating to international sanctions and embargoes, I discuss it with my Manager and contact the Compliance Department.

**We comply with all export control and national security laws and regulations that apply to our activities.**

## Compliant conduct

- I know, understand and respect the Group’s policy, in particular the “Ethics and Compliance in a nutshell” Handbook.
- I act in accordance with local and international laws and regulations.
- I identify the activities subject to these regulations.
- I carry out the necessary checks before conducting any activities related to a project.
- I consult the Export Control Manager before any export transaction.
- I ensure that I am authorized to use or access the controlled technology, assets and data and ensure that the required licences are in place before starting the activity.
- I make sure that the authorizations/clearances required for operations affecting national security are in place before starting work.

## Practical Example

**Q. My mission involves the transfer of software, hardware or know-how abroad. What should I do?**

**A.** Dual-use goods, technologies and software, i.e. those that can be used for both military and commercial purposes, may be considered as controlled products export of which is subject to authorization. In this case, I need to consult the Export Control Manager.



### Communication is the key

If I encounter a problem relating to the protection and security of data and information, I discuss it with my Manager or the Export Control Manager.

**We comply with competition laws and regulations. We also operate in strict compliance with the principle of fair competition.**

## Compliant conduct

- I know, understand and comply with the Group's competition policies, in particular the "Ethics and Compliance in a nutshell" Handbook and the Group's guidelines.
- I complete the mandatory training courses on competition law.
- I refrain from any contact with competitors without the prior agreement of the Legal Department.
- If I have any doubts or questions, I ask the Legal Department for advice.

## Practical Example

**Q. To respond to a customer's call for tenders, I need to set up a technical partnership with other players in the market. What do I need to do?**

**A.** I contact the Legal Department, which will determine whether such a partnership can be set up and under what conditions.



### Communication is the key

If I have to deal with a competitor, I discuss it with my Manager or the Group Legal Department.

## Charities, donations, sponsorship

We are committed to having a positive impact on civil society through our corporate sponsorship activities and local initiatives (particularly in the social, environmental and health fields). We carry out these actions in compliance with local laws and regulations.

### Compliant conduct

- I know, understand and respect the Group Policies.
- I make sure that the necessary checks are carried out before any charitable activity.
- I apply the Group's authorisation process for charitable activities prior to any sponsorship project or voluntary activity.
- I make sure that there is no question of self-interest in the activities that I promote.

### Practical Example

**Q. I would like to support a charity project. What should I do?**

**A.** I inform my Manager and contact the persons in charge of charitable operations within the Group.



#### Communication is the key

If I have a question about donations or sponsorship, I discuss it with my Manager and get in touch with the team in charge of these issues.

**We undertake to conduct all lobbying activities in accordance with applicable local laws and regulations.**

## Compliant conduct

- I obtain the approval of the Group's General Management for any lobbying activity I may wish to conduct.
- I comply strictly with the relevant regulatory obligations (in particular reporting obligations).

## Practical Example

**Q. I want to lobby for changes to a law on innovation. What should I do?**

**A.** I contact the Legal Department. The latter will liaise with the Group's General Management and determine the conditions to be applied.



### Communication is the key

If I have a question about lobbying, I discuss it with my Manager or the Compliance Department.

**We respect human rights wherever we operate.**

**We guarantee working conditions that respect workers' fundamental rights, in particular the right to decent working hours. We ban all forms of forced labour, modern slavery, human trafficking and child labour.**

**We only select our partners from first-tier players who comply with the regulations and our requirements.**

## Compliant conduct

- I ensure that human rights are respected in my area of responsibility.
- I ensure that our partners are aware of and apply the principles of the Responsible Purchasing Charter.
- I ensure that the necessary checks are carried out before entering into any business relationship.

## Practical Example

**Q. I notice that a potential counterparty of the ALTEN Group has been convicted of activities that violate human rights. What should I do?**

**A.** I refrain from doing business with this counterparty and inform my Manager and the Compliance Department.



### La clé c'est communiquer

If I have a human rights issue, I discuss it with my Manager or the Compliance Department.

We strive to sustainably reduce the impact of our activities on the environment by complying with international standards and benchmarks.

We are also committed to developing innovative and sustainable solutions, and in particular to promoting Responsible Digital Business.

## Compliant conduct

- I ensure compliance with environmental legislation. I know, understand and respect the Group's environmental and sustainable development policies.
- I attend the awareness-raising and training sessions organised by the Group on these topics.
- I behave in an environment-friendly way.
- I ensure that our commercial partners comply with environmental regulations and our Group policies.

## Practical Example

### **Q. How can I contribute to reducing ALTEN's environmental footprint?**

**A.** By taking simple steps such as switching my computer to standby mode, sorting waste, using videoconferencing whenever possible or using public transport, I can help to reduce ALTEN's environmental footprint.



### **Communication is they key**

If I have a question about the environment or sustainable development, I discuss it with my Manager or contact the CSR Department.



# Protecting the image of the Group, our customers and partners

We are the guarantors of ALTEN's image and must therefore act responsibly and ethically in all circumstances.

We must not do anything that could damage the reputation or image of the Group, our customers or our partners.

## Compliant conduct

- I behave responsibly, vigilantly and professionally at all times and in all places in order to protect the ALTEN Group's image.
- I use social networks wisely and responsibly.
- I respect the ALTEN Group's Graphic Charter in my communication materials.

## Practical Example

**Q. I'm preparing a corporate event. What should I do?**

**A.** I remind my team of the rules of good conduct.



### Communication is the key

If I am faced with a situation that is damaging to the image of the Group, our clients or our partners, I discuss it with my Manager.

### III. WHAT SHOULD YOU DO IF YOU HAVE ETHICAL QUESTIONS?



Any ALTEN stakeholder (internal or external) who witnesses or is the victim of an act contrary to the Ethics Charter may report it via the secure platform using the whistleblowing system: <https://alten.integrityline.com/>.

If I have any doubts or questions about the ethical guidelines (Ethics Charter, Anti-Corruption Code of Conduct, gifts and entertainment policy, etc.) or a situation relating to business ethics (corruption, conflicts of interest, etc.), I can consult my HR manager, my Manager, my Ethics and Compliance Ambassador or the Group Compliance Department ([compliance@alten.com](mailto:compliance@alten.com)).

ALTEN protects whistleblowers who, in good faith and without direct financial compensation, report an illegal act or risks of harm to the general interest. Every effort is made to protect the confidentiality of whistleblowers.

ALTEN undertakes to ensure that no one suffers any direct or indirect negative consequences (harassment, reprisals, discriminatory measures, etc.) as a result of using this system or providing information in good faith as part of an investigation.



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