

# THE STACI GROUP CODE OF CONDUCT



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## STACI GROUP CEO'S FOREWORD



Over the last 30 years, we have developed unparalleled expertise in multi-supplier, multi-customer and multi-product flow management.

We have expanded beyond the borders of France, then Europe, and become an international company.

We have a duty to follow the rules of the countries where we are present and to respect our communities and environment.

Our reputation, just like the trust we have built with our customers, depends on the conduct of each and every one of us. Appropriate ethical behaviour is a fundamental prerequisite in creating a healthy and effective day-to-day

business environment.

Only companies with a strong, ethical culture will last the tests of time in today's world. This is why we must clearly demonstrate and uphold our commitments on a daily basis as a company, an employer and as citizens.

Please take the time to read this document, share it and make sure you apply it in your daily working lives.

Thomas Mortier  
STACI Group CEO

## INTRODUCTION

Ethics is a practical guide to our everyday life that aims to tell people how they should behave. To do this, criteria are established to judge whether an action is right or wrong and the motives and consequences of an act.

STACI aspires to be an exemplary company when it comes to ethics and compliance. This Code sets out our values and describes the rules to be applied and the behaviour expected from our employees in all situations in every region of the world where the STACI Group operates.

The behaviour defined in this Code falls within the framework of fundamental principles that the STACI Group is committed to upholding and advancing:

- The Universal Declaration of Human Rights
- The United Nations Global Compact
- The United Nations Guiding Principles for Business and Human Rights
- The Organisation for Economic Cooperation and Development (OECD)

In France, the Sapin II Law and the Law on the Duty of Vigilance apply extra-territorially in the countries where STACI operates. However, in the event of failure to comply with the rules of this Code, local law will apply.

### **WHO IS THIS CODE FOR?**

This Code applies to all STACI Group employees worldwide, whether permanent or temporary. The term 'employee' includes STACI's own employees, consultants working under our responsibility, as well as our managers.

The principles contained in this Code are also expected to apply to all STACI Group associates, particularly customers and suppliers, while carrying out their contractual obligations with the STACI Group.

STACI Group managers are responsible for setting an example and promoting the values and commitments laid out in this Code to their employees and for ensuring its implementation.

This Code is relayed to new employees when they are hired so that they can refer to it. It is also made public on the Staci.com website. It is regularly updated to reflect any changes to the STACI Group's business activities, as well as legislative and regulatory changes. You are kindly asked to consult it regularly.

## **HOW DO I USE THIS CODE?**

The STACI Group falls under the jurisdiction of a multitude of laws and regulations due to its global presence and acting in compliance with these is essential.

Even so, this Code is not intended to restate or supplement the laws and regulations, agreements or internal guidelines that govern the activities of the Group's various entities and their employees. Neither can it address all the situations that employees may encounter while carrying out their work.

Many of these situations are not covered by laws, regulations or other internal and external regulations. In such situations, the principles of integrity, respect and fairness must govern everyone's conduct without prejudice to local laws and regulations.

Each employee must therefore exercise vigilance, consideration, sense and judiciousness.

This Code's purpose is then not to go into every detail of the behaviour to adopt in each situation, but rather give relevant examples and remind people of the spirit in which decisions ought to be made. A few examples feature at the end of this Code.

Sometimes certain situations may not be that simple. Any decision, however, must be made in accordance with the principles of this Code and requires these fundamental questions to be asked:

1. Is it **legal**?
2. Does it **comply with** the rules set out in this Code?
3. What is the **consequence** of my action or inaction?
4. Would I feel **comfortable explaining and justifying** my decision if it were made public to the STACI Group or externally?

# I. Our Group's values





## PARTNERSHIP

STACI supports companies in developing their logistics projects both nationally and internationally. Our customer support is best demonstrated by how we provide project teams and mobilise dedicated resources to continuously manage and optimise solutions.

Internally, this concept and how we behave also form a core part of our corporate philosophy. The support we provide encourages a culture of sharing expertise and transferring skills and practices.



## COMMITMENT

Commitment is the STACI philosophy's second cornerstone. It is the driving force behind our teams' responsiveness and engagement when defining and rolling out the implementation of logistics solutions. It also guarantees that a certain level of service and quality is delivered internationally. Finally, it helps meet the most complex logistical challenges by enabling customers to make significant savings.

The Group and its employees must show exemplary commitment to ethics, social and societal responsibility.



## INNOVATION

STACI is constantly innovating to meet the needs of an ever-changing world. Rapid digital developments mean that new logistics requirements have developed and this is where STACI provides a tailored response. The e-logistics infrastructures and solutions provided by STACI are used to support these developments and respond proactively to new requirements. Let's imagine the future of logistics together.



## II. Our commitment to people



The STACI Group adheres to the principles and values as laid out in the United Nations Universal Declaration of Human Rights. This recognises: the right to respect and dignity, a ban on all forms of discrimination, the freedom of assembly and association, and the freedom of opinion and expression, in addition to the right to work and to equal pay for equal work.

The STACI Group is committed to promoting the application of the Universal Declaration of Human Rights when carrying out its operations.

The STACI Group does not tolerate any form of discrimination, especially during the recruitment process or in the workplace. Whether that be on the basis of race, ethnic origin, age, nationality, country of origin, religion, gender, sexual orientation, sexual preference, disability, or social background.

The STACI Group does not tolerate any form of harassment. Any hostile, abusive, aggressive and offensive conduct is unacceptable and heavily sanctioned.

## 1. Promoting fundamental employment rights

Forced labour, child labour and undeclared work are all situations that will not be tolerated within the STACI Group.

Forced labour is defined as work performed under duress or threat. STACI is committed to exercising strict control over suppliers and service providers who might use people working under duress or threat. In such a case, the Group would implement a corrective action plan with the partner and - in the absence of a satisfactory result - would cease all relations with the supplier or service provider concerned.

Child labour includes any form of economic activity performed by children that deprives them of their dignity and impairs their normal physical and psychological development.

STACI commits to strictly respecting the age limit, as set out in the legislation in force in each country where it operates and to never employing a child under the age of 16 in any country.

Undeclared work means not officially declaring to the competent authorities that a person is working for the company, therefore depriving the said person of their social rights and the community of the social contributions associated with the said person's work.

In each country where it is present, STACI commits to never having recourse to undeclared work and is careful to provide guidelines to this effect.

## 2. Developing Labour Relations

Labour relations is at the heart of creating harmony between people. It aspires to always seeking out consensus, which is what makes it a vital component in reducing work-based conflicts.

Encouraging dialogue enables the Group to build a close relationship with all its employees, thus giving everyone the opportunity to make their voices heard.

The STACI Group is committed to promoting quality labour relations that can resolve important economic and social issues, promote good governance and encourage peace and social stability.

For this to happen, the STACI Group and all its employees must respect freedom of association and the right to collective representation, trade union rights, bodies representing employees, as well as those representatives from employees and trade unions.

## 3. Combating harassment

**Moral harassment** is defined as repeated behaviour with the purpose or effect of degrading working conditions that may affect an employee's rights and dignity, impair their physical or mental health or jeopardise their future career.

Any behaviour or action that goes against the right to respect and human dignity is unacceptable.

**Sexual harassment** is the repeated use of words or behaviour with a sexual connotation aimed towards a person, of any gender, that demeans or humiliates that person's dignity by reason of its degrading or humiliating nature or that creates an intimidating, hostile or offensive situation for that person. The same applies to any form of pressure, even if it is unrepeatable, with the real or apparent aim of obtaining an act of a sexual nature for the benefit of the harasser or a third party.

Such behaviour might involve unwanted or inappropriate physical contact, emails, looks or gestures, comments, invitations or solicitations of a sexual nature expressed in any form, or the sending or display of material of a sexual nature (documents, images, objects, etc.). Such behaviour might also be framed around obtaining a promotion or other benefits conditional on satisfying a sexual act.

Harassment may occur inside or outside the STACI Group premises and might originate from an employee of the Group or from a customer, supplier or partner.

STACI does not tolerate any form of harassment and asks each employee who is a victim or direct witness of such behaviour to alert the appropriate person. That could mean reporting to the employee's line manager, the Human Resources Department, etc., about this behaviour using the normal channels or using the procedure for collecting information from whistle-blowers.

#### 4. Relations with our partners and subcontractors

STACI commits to respecting workers' rights in general and ensuring that its contractors and suppliers do not violate these rights. It is especially important that the latter do not seek to provide labour through third party companies, except where permitted by law.

#### 5. Occupational health and safety

STACI commits to protecting the health, work-life quality and safety of its employees and anyone with a relationship to STACI. This commitment involves:

- evaluating, warning and controlling the professional risks inherent in its business activities;
- taking all reasonable precautions to maintain a safe and healthy working environment;
- ensuring that its actions do not involve any risk to the business or to others;
- ensuring that its employees are aware of what to do in the event of an emergency in the workplace.

STACI also commits to dealing with any situation affecting the safety or health of persons with all necessary precautions, while respecting applicable law and implementing corrective actions as part of a continuous improvement process.

#### 6. Non-discriminatory and transparent recruitment practices

Any selection based on non-professional motivations (such as religion, age, gender, sexual orientation, disability, political opinions, ethnic origin, trade union membership, etc.) is prohibited.

Raising awareness is essential in breaking down stereotypes on which discrimination is built. The backgrounds we come from, our past experiences and unconscious bias can influence how we consider a candidate for a role and the questions we ask.

STACI strives for a selection process based on a common methodology for all candidates for the same position.

STACI also commits to recruiting solely on the basis of its needs and the qualities of each candidate (professional and interpersonal skills) without taking anything else into consideration.

#### 7. Encouraging and respecting diversity and inclusion

When applied to a company, diversity refers to the variety of human profiles that may exist within the business (country of origin, region, neighbourhood, surname, culture, age, gender, physical appearance, disability, sexual orientation, qualifications, etc.).

STACI commits to promoting diversity by taking an inclusive approach that recognises and values individual differences as real assets for the performance of the company.

## 8. Training and coaching

Training and coaching help maintain the employability of all employees and develop their skills along their career path.

STACI commits to developing its employees' skills, not only for the future of the business but also to ensure that they are ready to face the challenges of a continuously changing world.

Additionally, equal treatment and equity are two cornerstones of internal development at STACI. The STACI Group is committed to treating all its employees equally and fairly in their career development and remuneration. The STACI Group pays careful attention when it comes to equal pay for all.

## 9. Personal data protection

The protection of personal data (surname and/or first name, telephone number, e-mail address, bank card details, customer preferences, etc.) seeks to protect all information relating to directly or indirectly identifiable private individuals and to define the conditions under which such data might be collected and processed.

This information is protected by several acts of legislation concerning the right to privacy, in France and within the European Union (including the General Data Protection Regulation - GDPR) and in other regions of the world.

The STACI Group has made a commitment to this legislation and has adopted a policy for processing the personal data belonging to STACI Group employees, which can be consulted on its intranet.

## 10. Environmental protection

The STACI Group complies with the obligations and regulations pertaining to environmental protection.

Our commitments regarding environmental policy are essentially based on:

- Solutions for sharing and management of flows with a high impact on CO2 emissions;
- A sustainable transport policy with environmentally friendly urban logistics solutions;
- An active policy for reducing consumables: paper, energy, electricity, optimising packaging, etc.

# III. Our commitments as a company with integrity



The reputation of the STACI Group is determined to a large extent by our actions and how every one of us presents ourselves and behaves. Illegal or inappropriate behaviour on the part of an employee can cause considerable damage to the STACI Group. All employees must ensure that the reputation of the STACI Group is maintained and promoted.

### 11. Protection and use of company assets

STACI's property consists of all tangible and intangible assets held by the STACI Group. They allow our employees to perform their duties. For example, assets include: IT equipment, vehicles, general equipment, intangible assets such as images, patents, expertise, etc.

Private use of STACI's property is only permitted when it is set out in an individual contract, collective agreement or STACI's regulations, or if use of such property is an accepted STACI practice. Employees must avoid any fraudulent use of the STACI Group's assets and must particularly endeavour to protect them from loss, theft, damage or misappropriation.

### 12. Intellectual property

Intellectual property is one of the STACI Group's most important assets. It includes all intellectual works and, in particular, industrial property. Intellectual property is protected by certain rules that govern the use and disclosure of these elements.

In particular, the goods protected by these rules include: all technical data and documents, plans, settings, expertise, trade secrets, software, industrial designs and drawings. Employees must safeguard the STACI Group's intangible assets protected by intellectual property.

They must also respect the intellectual property of third parties. All knowledge, methods, written documents, in addition to any other information concerning the STACI Group's business activity developed while in an employment relationship, remain the property of the STACI Group.

### 13. Purchasing policy and selection of subcontractors and service providers

The STACI Group establishes fair, loyal and sustainable relationships with its subcontractors and service providers.

Subcontractors and service providers are selected on the basis of their technical skills and quality of service in accordance with the current procedure for selecting partners within the STACI Group. Their sustainable development initiatives are taken into account during the selection process.

The STACI Group expects its subcontractors and service providers to comply with the laws, the values and the principles laid out in this Code.

Subcontractors and service providers are responsible for ensuring strict compliance with the principles laid out in this Code in the course of their activities, while on their sites, by their affiliated companies, their employees and their own subcontractors/suppliers.

The STACI Group encourages its subcontractors and service providers to promote the principles laid out in this Code internally and throughout their supply chain. The STACI Group regularly checks that its subcontractors and service providers are compliant with this Code.

## 14. Anti-corruption

The STACI Group is committed to implementing and carrying out effective measures to prevent, detect and eliminate any potential acts of fraud or corruption.

**Corruption** covers any offer, promise, donation, gift or reward used to influence a person who has private or public authority to perform or abstain from performing an act related to or facilitated by their office, duty or mandate. It also covers any abuse of their proven or alleged influence with a view to obtaining awards, jobs, contracts or any other favourable decision.

**Fraud** covers any deliberate act or omission that is concealed and committed with the intent to deceive or circumvent the applicable laws in order to obtain an undue material or moral advantage for the person committing fraud or a third party. Fraud takes many forms: theft of money, property, data, deliberate tampering, concealment or destruction of documents, false entries or declarations, accounts manipulation, forgery and swindling.

**Influence peddling** is the direct or indirect request or acceptance of offers, promises, donations, gifts or rewards granted in order to use a person's real or supposed influence with a view to obtaining distinctions, jobs, contracts or any other favourable decision from a public authority or administration.

The STACI Group rejects all forms of corruption, fraud and influence peddling and is particularly committed to the anti-corruption principles laid out by the OECD and the United Nations.

In this respect, all employees commit to:

- Refraining from soliciting funds, gifts, invitations or any other benefit;
- Refraining from offering, giving or promising gifts, invitations or benefits in any form to a public official or private individual, where the intention is to obtain any advantage, preferential treatment or influence in connection with the carrying out of a transaction or the conclusion of a contract;
- Refraining from tolerating corruption in connection with any of our business relationships, whether that be directly or indirectly, by or on behalf of our employees, agents or consultants;
- Understanding and obtaining information on the anti-corruption rules in the countries where they operate;
- In case of doubt, inform your line manager of requests or solicitations.



## 15. Conflicts of interest

A conflict of interest is a real situation in which a person has an interest that may influence or appear to influence the way in which they carry out the tasks assigned to them and exercise their responsibilities.

Conflicts of interest may arise between individual employees and the STACI Group, but also between their family members or close relatives and the STACI Group.

Employees must not have interests that are in conflict with those of the STACI Group.

Employees must take all necessary steps to prevent and avoid actual or apparent conflicts of interest. They must be particularly vigilant, especially when going on a new assignment, and inform their line manager in case of doubt.

**Competition with the STACI Group:** employees may not manage or assist a company in competition with the STACI Group or engage in any competitive activity.

**External employment:** STACI expects its employees to dedicate themselves fully to their responsibilities at the STACI Group. Employees must inform their superior before accepting any other paid employment. Employees may not participate in any external employment activity that could have a negative impact on their ability to carry out their responsibilities at the STACI Group. Secondary activities must not run contrary to the interests of the STACI Group. This applies in particular to secondary employment for competitors.

Additionally, no employee who obtains extra outside employment, an external business activity or is working on an invention, may use his working hours at the workplace or any STACI Group assets or confidential information for his other employment, external business or invention.

**External directorships:** STACI encourages its employees to be members of industrial and civic bodies. Nevertheless, these positions may create a conflict of interest. Employees must obtain prior permission from the STACI Group's Executive Management Board before accepting a position on the board of directors or advisory board of a STACI Group service provider, customer, developer, business partner or of an organisation whose activities relate to industry standards.

**Personal Investments:** STACI Group employees can hold investments in listed companies or private companies. While such investments do not generally pose a problem, they may create a conflict of interest if an employee is involved in a transaction or attempts to influence a transaction between the STACI Group and a company in which they hold a significant economic interest.

## 16. Gifts and invitations

The STACI Group recognises that commercial gestures such as gifts or invitations can contribute to maintaining good commercial relations with subcontractors, service providers and business partners.

However, in certain circumstances, gifts, invitations and other benefits that are given might alter or influence conduct and decisions during business negotiations. The solicitation, offering and receiving of benefits might be considered as acts of corruption or influence peddling and might raise questions surrounding the integrity of the Group's business practices and damage the company's reputation as a result.

Gifts offered and received by employees must:

- Have a reasonable and symbolic value;
- Be occasional;
- Comply with applicable laws and regulations and local customs;
- Be clearly recorded in the STACI Group's accounting statements;

Employees are invited to familiarise themselves with the guidelines and procedures in place at the STACI Group.

In case of doubt, employees should contact their immediate superior.

## 17. Patronage and sponsorship

**Patronage** is financial or material support provided by a company or private individual for an action or activity of general interest (culture, research, humanitarian work, etc.).

It differs from sponsoring or sponsorship by the nature of the actions supported and by the fact that there is no contractual advertising or public relations in return for support of the patron.

The patron's details are therefore used discreetly for the event or action being supported. However, he can display his support on his own communication media.

Patronage is often in line with corporate values, but it may have image and communication and/or internal mobilisation objectives. Patronage enables tax deductions, unlike sponsorship that is considered an advertising investment.

**Sponsorship** is financial or material support given to an event or individual by an advertising partner in exchange for various forms of advertising publicity linked to the event or individual.

In addition to the various forms of publicity for advertising purposes, the sponsorship contract may provide for a number of public relations obligations or the participation of the sponsored individual at various company events (congresses, seminars, shop openings, product launches, etc.).

The sponsor is looking for the publicity an event can offer, but also to gain from the positive reputation and association depending on the type of event and the values associated with it. Sponsorship may also have internal benefits by motivating employees and ensuring their loyalty. The best known and most visible form of sponsorship is sports sponsorship. Sports sponsorship differs from patronage in its form and in its tax treatment.

The STACI Group undertakes never to be used to unduly advantage, improperly influence or give the impression of improperly influencing any decision-making process whatsoever.

## 18. Compliance with financial auditing procedures

The quality of our accounting and financial information is crucial for the management of the company, compliance with our legal and tax obligations and the annual certification of our accounts by our statutory auditors. Each person, no matter which level, ensures that their financial and accounting information is provided and documented without delay and in a precise, transparent and complete manner.

The operations and transactions carried out by the STACI Group are recorded in a true and correct manner in the accounts of each company, in accordance with applicable regulations and internal procedures. It is particularly important that all employees making accounting entries demonstrate precision and honesty, and ensure documentation exists corresponding to each entry.

The STACI Group commits to being able to provide proof of the source and use of any funds at all times.

The STACI Group and its employees refuse to use any means or technique of payment that preserves the anonymity of the payer and the beneficiary.

## 19. Anti-competitive practices

Laws and regulations relating to anti-competitive practices are based on the principle that free competition without any understanding between rival companies is the only way to serve the public interest.

It is therefore strictly forbidden to participate in agreements or arrangements that might violate laws and regulations, especially those relating to anti-competitive practices.

This can be formulated by

- agreements or discussions with the purpose of:
  - (a) directly or indirectly fixing prices, discounts or conditions of sale; (b) limiting or controlling production, technical development or investment;
  - (c) sharing markets, customers or sources of supply
- agreements or practices designed to apply unequal conditions between trading partners, to impose on them conditions contrary to normal commercial practice or to refuse to deal with them without good reason.

All Group employees must ensure strict compliance with the laws and regulations in force governing anti-competitive practices, nationally or in foreign countries.

For example, it is forbidden to give, offer or promise anything of value, including cash, services, gifts, entertainment or other business courtesies, for the purpose of influencing a person's actions, obtaining a regulatory advantage, influencing paperwork status or improving business interests.

## 20. Data confidentiality

The term "confidential data" means any information, whatever the form, which is not in the public domain.

The protection of confidential data is particularly important to the STACI Group's operations.

While carrying out their work, employees might be given access to a wide range of information about the STACI Group, its customers, business partners, subcontractors and service providers.

Any fraudulent use or disclosure of confidential and protected information and data concerning third parties such as customers or competitors may constitute a criminal offence and expose the STACI Group, its directors and employees to prosecution. Moreover, communicating such information may harm the STACI Group's commercial interests or those of its partners.

Confidential data and information notably include: software, customer records, passwords, contracts and agreements, financial data, national and international development plans, mergers, acquisitions and sales plans, and commercial pricing information, etc.

Employees must take all appropriate measures to protect the data and maintain the confidentiality of information in their possession in order to prevent its disclosure or improper use.

This obligation continues to apply once they leave the STACI Group.

Employees must exercise discretion when using means of communication (telephones, e-mails, etc.) to share confidential information and data.

If in doubt about the nature of a piece of information and the procedure for disclosing it, employees should contact their line manager.

# IV. Compliance with the Code of Conduct



Law no. 2016-1691, also known as “Sapin II” dated 9th December 2016, relates to transparency, anti-corruption and the modernisation of economic life and its implementation decree dated 19th April 2017 (no. 2017-564) established a legal framework for whistle-blowers, who have been given a unique status replacing the prior special statuses.

Under these guidelines, the new law provides for an obligation to set up a system for collecting alert reports.

Additionally, the law pertaining to the duty of vigilance of parent companies and contractors towards their subsidiaries and subcontractors of 27th March 2017 requires us to implement mechanisms to prevent human rights abuses and environmental damage throughout their production chain via an alert reporting procedure.

## 21. Ethics Committee

An Ethics Committee has been set up at Group level. It is required to meet every six months and whenever necessary.

The objectives of the Ethics Committee are to:

1. Decide on updates to this Code and related procedures;
2. Oversee the application of this Code and related procedures;
3. Deal with all situations concerning the execution of this Code and related procedures.

## 22. Alert reporting procedure

In the interests of integrity, the STACI Group has set up an internal alert reporting procedure available to any employee who becomes aware of a possible violation of the law and this Code.

In addition to the existing traditional channels, any employee who becomes aware of a violation can issue an alert using the procedure available on the STACI Group intranet. Employees are invited to familiarise themselves with this procedure which details alert reporting conditions and the procedure to be followed.

This alert procedure guarantees strict confidentiality of the author(s) of the report, of the person(s) concerned and of the information gathered in the report.

No employee may be penalised, demoted, suspended, discriminated against or subjected to reprisal for reporting an offence or a potential offence in good faith.

## 23. Sanctions for non-compliance

Acts contrary to the principles of this Code could have detrimental consequences for the STACI Group from an economic point of view, as well as from an image and reputational one.

Failure to comply with this Code might lead to:

- disciplinary action (e.g. dismissal for serious misconduct), but also civil sanctions (e.g. damages) and penal sanctions (e.g. fines and/or prison sentences), brought against any STACI Group employee responsible for these actions;
- the termination of any business relationship with any business partner who does not act in accordance with the values and principles in this Code.

## 24. Contacts

If you have any questions or difficulties in understanding the various situations mentioned in this Code, please contact your line manager and the Human Resources Department as a first port of call.

## CASE EXAMPLES OF THE CODE OF CONDUCT

### Promoting fundamental employment rights

What is good conduct?	What is forbidden?
<ul style="list-style-type: none"> <li>✓ Carefully checking the age of employees who are under 18.</li> <li>✓ Systematically asking service providers for proof that workers are declared to the competent authorities.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Not declaring an employee on the pretext that they are on a short-term assignment.</li> <li>➤ Letting an employee work without a valid visa.</li> </ul>

### Developing labour relations

What is good conduct?	What is forbidden?
<ul style="list-style-type: none"> <li>✓ Informing and consulting employee representative bodies, even when this is not compulsory.</li> <li>✓ Negotiating agreements rather than making unilateral decisions.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Putting pressure on employees not to join or form a union.</li> <li>➤ Tampering with elections so that there are no unions in the company.</li> <li>➤ Obstructing or preventing the consultation procedure with representative bodies.</li> </ul>

### Combating harassment

What is good conduct?	What is forbidden?
<ul style="list-style-type: none"> <li>✓ Being respectful in your professional relationships.</li> <li>✓ Immediately reporting any situation of sexual harassment or bullying you are aware of to your line manager or Human Resources Department.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Adopting a hurtful, offensive, humiliating or degrading attitude towards a colleague, supplier or business partner.</li> <li>➤ Pursuing an attitude or behaviour that you have been told is undesirable or inappropriate.</li> </ul>



## Occupational health and safety

What is good conduct?	What is forbidden?
<ul style="list-style-type: none"> <li>✓ Following safety instructions and taking all reasonable and necessary precautions to maintain a safe and healthy working environment.</li> <li>✓ Making sure that your actions do not put others at risk.</li> <li>✓ Reporting to your line manager or to the QHSE Department any situation likely to jeopardise the safety of your working environment or the health, safety or working conditions of the site where you work.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Driving a truck without an up-to-date CACES and without having driving authorisation, even if the request comes from a superior.</li> <li>➤ Not wearing personal or collective protective equipment under the pretext of a very temporary risk situation.</li> <li>➤ Allowing a person from outside the site to enter without protective equipment.</li> </ul>

## Non-discriminatory and transparent recruitment practices

What is good conduct?	What is forbidden?
<ul style="list-style-type: none"> <li>✓ Selecting candidates on the basis of objective criteria such as: <ul style="list-style-type: none"> <li>• Professional experience in the position or in a similar position;</li> <li>• Qualifications and training courses that fit the job;</li> <li>• Skills and knowledge useful for the job (language, computer skills, etc.).</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>➤ Asking questions that may be perceived as risking direct discrimination such as: <ul style="list-style-type: none"> <li>• How old are you?</li> <li>• Are you planning on having children?</li> <li>• What is your religion?</li> <li>• Are you a member of a trade union?</li> </ul> </li> </ul>

## Encouraging and respecting diversity and inclusion

What is good conduct?	What is forbidden?
<ul style="list-style-type: none"> <li>✓ Encouraging partnerships with companies employing people with disabilities or seeking reintegration into employment.</li> <li>✓ Adapting the job requirements to the personal situation of the employees (disability, difficulty with the national language, etc.).</li> </ul>	<ul style="list-style-type: none"> <li>➤ Refusing a candidate because of their disability, nationality or origin.</li> <li>➤ Ignoring the implication of a disability in an employee's career development.</li> <li>➤ Mocking a colleague because of their disability or nationality.</li> </ul>

**Training and coaching**

What is good conduct?	What is forbidden?
<ul style="list-style-type: none"> <li>✓ Ensuring that teams are motivated, that the work they do is valued and that their professional development is encouraged.</li> <li>✓ Ensuring that all STACI Group employees are trained and paid equally and fairly.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Discriminating against an employee because of maternity/paternity/parental leave.</li> <li>➤ Not training an employee because of their older age.</li> <li>➤ Awarding bonuses, raises or training on the basis of non-objective criteria.</li> </ul>

**Data protection**

What is good conduct?	What is forbidden?
<ul style="list-style-type: none"> <li>✓ Only using the data you really need.</li> <li>✓ Enabling people to exercise their rights of access to their personal data (correction, deletion, opposition to the use of their data, etc.).</li> <li>✓ Ensuring the confidentiality and security of the personal data you process.</li> <li>✓ Immediately informing your line manager if the data are compromised (lost, stolen, damaged, disclosed, etc.).</li> </ul>	<ul style="list-style-type: none"> <li>➤ Collecting so-called “sensitive” information (e.g. relating to health status, ethnic origin, sexuality, political opinions, religious beliefs) without the express consent of the person concerned.</li> <li>➤ Accessing or storing personal data without the necessary authorisation or allowing an unauthorised third party to access them.</li> <li>➤ Using data for purposes other than those for which they were originally collected.</li> </ul>

**Anti-corruption**

What is good conduct?	What is forbidden?
<ul style="list-style-type: none"> <li>✓ Internally declaring any gifts or benefits received or directly sent to the home address.</li> <li>✓ Demonstrating constant vigilance and implementing guidelines for relationships with intermediaries or suppliers.</li> <li>✓ Ensuring that all payments are properly justified, documented and authorised.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Offering, promising or giving a third party benefits, financial or otherwise, with the intention of influencing them to improperly perform an action or omission.</li> <li>➤ Soliciting, receiving or accepting a financial or other personal benefit in return for the supply of goods or services.</li> </ul>

**Conflicts of interest**

What is good conduct?	What is forbidden?
<ul style="list-style-type: none"> <li>✓ Refraining from sitting on the board of directors of any STACI Group customer, supplier or competitor.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Using your professional position to directly or indirectly make personal profit or to attribute benefits to a third party to the detriment of the Group’s interests;</li> <li>➤ Failing to disclose any information relating to a conflict of interest.</li> </ul>

**Gifts and invitations**

What is good conduct?	What is forbidden?
<p>Please refer to the applicable internal procedure on business gifts and invitations within the STACI Group.</p>	

**Patronage and sponsorship**

What is good conduct?	What is forbidden?
<ul style="list-style-type: none"> <li>✓ Selecting projects or activities to be supported based on objective considerations.</li> <li>✓ Contractualising all patronage and sponsorship projects</li> </ul>	<ul style="list-style-type: none"> <li>➤ Taking personal interests into consideration</li> </ul>