

ethical charter

econocom

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Jean-Louis Bouchard,
Groupe Chairman

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FOREWORD BY JEAN-LOUIS BOUCHARD, GROUP CHAIRMAN



Econocom Group is constantly evolving in terms of its challenges and ambitions to create an environment that is favourable to innovation, to better serve its clients, partners and employees.

The Group's corporate culture is based on strong values that create the foundation for its actions and serve as a guideline for its decisions.

The 6 values that make up Econocom's identity, Be enterprising, Bounce back, Face reality, Build together, Proud to be responsible and Respect, are expressed through our ethical commitments and our accountability in all our fields of activity, particularly with respect to:

- our shareholders, for whom we undertake to implement a logical and transparent system of governance and to ensure sustainable, profitable growth for the Group
- our employees, with the aim of improving quality of life at work
- our clients and partners, for whom Econocom's priorities are addressing their needs, collaborative innovation and lasting relationships
- our suppliers, by implementing a responsible purchasing policy
- society, ensuring respect for the environment and the law, with a commitment to supporting those who work in the humanitarian field and particularly in fighting against the social divide.

This is why Econocom has decided to bring together all the men and women of the Group with an Ethical Charter that will shape our everyday behaviour and practices based on these values.

This Charter will really come into its own if each of us undertakes to observe and apply its rules, and also to communicate them with the aim of sharing our knowledge for, as Antoine de Saint Exupéry said, *"Each is solely responsible for all"*.

Let us all work together to make Econocom an example to which everyone will be proud to belong.

Jean-Louis Bouchard
Président

PRESENTATION AND COMEX' COMMITMENT

We, the members of the Executive Committee of Econocom Group, are determined to uphold at Econocom the founding values that represent its DNA: Be enterprising, Bounce back, Build together, Proud to be responsible and Respect.

Econocom Group sets the standards in the market for digital technologies, and more and more clients and partners are turning to us to implement solutions that provide access to these new technologies. For the sake of our clients and partners, and also for our employees, it is our duty to base all our actions and decisions on high standards and a rigorous application of our values and ethical principles.

This is why, along with our Chairman, we hereby pledge to apply this Ethical Charter and respect its principles.

The Ethical Charter applies to all the Group's employees and entities, and will be the guiding light for compliance with Econocom's ethical principles.

Our ethical approach, as reflected in our sustainable development programme Ecoresponsible, is based on fundamental principles of integrity, respect, compliance, exemplarity, equity and responsibility. The Charter was drawn up on the basis of these qualities which must serve as inflexible guidelines for the actions of each and every one of us and encourage greater solidarity within the company.

As the scope of application of these ethical principles is not always easy to grasp, we and the other Group managers will be available and attentive to the needs of any employees who require advice or support when faced with ethical decisions.



Véronique di Benedetto

Econocom's Managing Director
of France



Bruno Lemaistre

Managing Director
of Econocom



Jean-Philippe Roesch

Managing Director
of Econocom

ECONOCOM GROUP ETHICAL CHARTER

Econocom Group, mindful of the impact its activities may have on society and the environment through the products and services it provides, undertakes to ensure that its values are observed at every stage of its projects and actions.

To that end, Econocom Group has decided to go beyond merely complying with the legislation in the countries in which it operates by committing to a corporate social responsibility programme called “ *Ecoresponsible* ” and adhering to the United Nations Global Compact. Ethics should be at the heart of the group’s practices in all its lines of business.

As a responsible company, Econocom has adopted this charter and will ensure that it is implemented and complied with by all its employees, sub-contractors and representatives in the broadest sense (hereafter referred to as “ Staff and representatives ”), wherever they may be and whatever function they perform. The principles of this Charter apply to all Staff and representatives, in addition to the company’s existing rules and standards, so that the framework and purpose of the rules enforced within the company may be better defined.

Econocom also wishes to extend the application of these principles to all stakeholders in the Group, and particularly its suppliers and partners.

Naturally the principles laid down in this Charter cannot be exhaustive. It is up to all Staff and representatives to apply the Group’s principles and values so as to modify or adapt their behaviour according to circumstances and to ask the right questions to ensure that their decisions comply with the Group’s ethical principles.

This Charter lays down a set of inflexible principles that should guide the actions of all the Group’s Staff and representatives. Failure to comply may lead Senior Management to decide on appropriate corrective measures.

INTEGRITY

Econocom runs its business according to a strict ethical framework. This Charter forms an integral part of the general principles governing its activities, along with compliance with applicable laws and regulations.

Conflicts of interest:

- ↪ Econocom wishes to avoid any conflicts of interest. This implies that no Staff member or representative may deliberately compete, directly or indirectly, with the Group, or possess a financial interest in the business of a supplier or partner in competition with the Group. If such a situation were to arise, Management should be informed. It will then ensure that any decision or choice arising from this situation is made by individuals who are impartial and able to guarantee the integrity of Econocom Group.

Passive or active corruption:

- ↪ Econocom condemns all active or passive corruption or attempts to corrupt, whether direct or indirect.
 - **Active corruption** occurs when a Staff member or representative of Econocom Group offers any client, prospect, authority or partner a benefit, invitation or gift that violates applicable laws or goes beyond the limits of what is reasonably acceptable in a business environment or that could be construed as an attempt to influence the impartial judgement of that third party.
 - **Passive corruption** occurs when a Staff member or representative of Econocom Group accepts a benefit, invitation or gift offered by a supplier or partner in violation of the legal and regulatory framework or that goes beyond the limits of what is reasonably acceptable or that could be seen as a means to influence his or her impartial business judgement.

It is strictly forbidden to accept any gifts, invitations or benefits of any kind during invitations to tender from clients or suppliers.

Any Staff member or representative faced with such a situation should immediately inform his or her superiors who will recommend an appropriate course of action and will, if necessary, consult the Group's legal department.

Use of the company's assets or financial data:

- ↪ Econocom Group condemns any use of company assets, resources, equipment, data or finances for personal reasons or in an unauthorised manner.

Communication on the company's offering and products:

- ↪ Econocom endeavours to provide information on its offerings and products in good faith.

RESPECT

In the management of its business, Econocom constantly endeavours to ensure respect for all persons, inside and outside the company, irrespective of their rank or position.

Security:

- ↪ Econocom makes use of all available means to ensure the security of the people and assets for which it is responsible as part of its business activities. It ensures that the working environment and conditions comply with the standards and regulations applicable to the company.

Respect for individuals:

- ↪ Econocom undertakes to protect Human Rights and comply with the principles of the fundamental conventions of the International Labour Organization (ILO).

Protection of data and confidentiality:

- ↪ Econocom makes every effort to protect its assets and the confidentiality of Group data, and particularly data relating to its clients and contracts. It is the duty of the Group's staff and representatives to ensure that all non-public data remain confidential and are used only for professional reasons by duly authorised persons who have a legitimate reason for such use. In order to prevent any disclosure of confidential information, the legal department may be requested to draft a Non-Disclosure Agreement before any operation is undertaken.
- ↪ Econocom complies with all laws, regulations and business agreements concerning the protection of personal data relating to its Staff and representatives, with due regard to protection of their privacy.

Protection of the environment:

- ↪ By assessing the impact of its activities on the environment and undertaking to reduce them, particularly through active waste management, optimising pollution and implementing a responsible purchasing policy, Econocom is committed to the protection of the environment and has developed a genuine strategy for Corporate Social Responsibility (CSR).

COMPLIANCE

- By adhering to the United Nations Global Compact, Econocom has committed to complying with the ten principles contained in the Compact and reporting on their implementation.
- Econocom undertakes to comply with the principles of this Charter all over the world and to inform its partners and suppliers of their importance for Econocom so that they in turn should comply with these ethical principles.
- All Econocom Staff and representatives are guarantors of the Group's values, interests and reputation and shall ensure that they make no commitments that are not within their powers. When necessary they may, in certain situations, request prior approval from their superiors or the legal department before making a commitment on Econocom's behalf.

EXEMPLARITY

- Econocom Group's Management, as sponsors of the *Ecoresponsible* programme, undertake specifically to implement the principles of this Ethical Charter on an everyday basis, to comply therewith, and to ensure the compliance of every Staff member and representative. They will ensure that this Charter remains active and may be adapted if necessary.
- The principles of this Charter and, more generally, all the rules and procedures of the company apply to every Staff member and representative, irrespective of his or her position in the Group's organisation or hierarchy, with no distinction whatsoever.

EQUITY

- Econocom undertakes to pursue its activities in full compliance with competition rules and with respect for its competitors.
- Econocom undertakes to treat all potential partners or suppliers with fairness and impartiality. Partners will be selected on the basis of objective criteria which may be disclosed during calls for tender or on request.
- In terms of recruitment, choosing partners and promotion, Econocom has always given priority to the skills of each individual. Econocom condemns all forms of discrimination, not only in terms of the law but also according to all national and international regulations.

ACCOUNTABILITY

- Econocom's relationships with its suppliers, partners, clients and employees are based on trust and mutual respect.
- In this respect, Econocom intends to share, explain and promote its Ethical Charter and its principles to everyone, both inside and outside Econocom Group (suppliers, clients, partners, public authorities, etc.) so that they may be understood and implemented.
- Finally, Econocom undertakes to answer all questions concerning its Ethical Charter and to work actively to improve and enhance it.

APPENDIX



>> The International Labour Organization's Fundamental Conventions <<



>> The UN Global Compact's ten principles <<