

# CIS

Integrated Life Support Services



## ETHICS CHARTER

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## 1. ETHICAL CONDUCT IN OUR RELATIONS WITH THIRD PARTIES

Relations CIS maintains with third parties, and in particular our customers, are essentially based on their confidence in us and CIS' reputation and experience throughout the world.

To maintain and strengthen this confidence, we must comply with multiple obligations and strict rules of conduct. These must be specifically defined and shared by all in a manner that does not adversely affect our reputation. We must also, and in all circumstances, manage our words and actions, and demonstrate the utmost integrity.

### 1.1. THE PURCHASE OF EVERYDAY GOODS AND SERVICES

Within the framework of the purchase of goods and services, (including for the services of intermediation), the selection of suppliers must be carried out in a fair manner based on objective criteria of comparison and according to tendering procedures applicable within CIS Group, if a request for call for tenders is launched.

Rates applied must always be consistent with those applied by the market.

With respect to calls for tender relating to investments involving major purchases, at least three suppliers must be consulted in order to effectively assess the best of three quotes.

***A member of my family is the manager of a food product supplier company I would like to place an order with his/her company***

*You may inform the purchasing manager of CIS or the subsidiary concerned about existence of this supplier in order to assess the suitability of placing an order with this company. However, the supplier can only be selected if the rates and services it proposes are competitive. Furthermore, you must not intervene directly or indirectly in the selection of this supplier. In effect, any potential conflict of interests must be avoided and the supplier must be selected, if applicable, according to objective criteria, excluding any possibility for favouritism or unfair competition.*

### 1.2. ANTI-MONEY LAUNDERING MEASURES

CIS Group's commitment to the principles of impartiality, integrity and openness is also reflected by its compliance with all laws relating to money-laundering practices in all countries.

As a general rule, money-laundering is defined as the introduction of funds of an illicit origin into legal financial channels for the purpose of their concealment or giving them a legal appearance (a criminal offence punishable as severely as corruption under all national and international laws).

Management and staff must safeguard the integrity and of CIS Group's reputation by assisting in the detection of possible activities of money laundering. They must accordingly immediately notify CIS' Executive Management or their direct supervising management whenever they have a suspicion of being confronted with the practice of money laundering, as for example, when encountering hesitation by a customer to provide complete information about the origin of funds or products or a request on the latter's part for payments in cash.

In particular, in the case of any doubt with respect to payment in cash or the origin of funds paid by a customer or repaid by one of our partners (payment exceeding the amount owed, multiple sources of payments, etc.), we ask that you contact immediately your supervising manager for guidance.

***A customer wishes us to make a settlement in several parts: one payable from an account in France in euros, another from several bank accounts domiciled in other countries denominated in different currencies, different from those indicated on the invoice. It also arises that the same customer asks us to allow for settlement for a portion in cash.***

*Such requests by the customer provide grounds for suspicion of money laundering. For that reason, it is necessary to refuse payments that are "out of the ordinary" and immediately report such requests to your management.*

### **1.3. PREVENTION OF CORRUPTION**

In the fight against corruption, the CIS Group has adhered to the "Middlenext Anti-Corruption Code of Conduct", which is an integral part of this Code of Ethics.

It is therefore essential to read this Middlenext Anti-Corruption Code of Conduct and to comply with it in all circumstances. This code of conduct is available on the website [www.cis-catering.com](http://www.cis-catering.com) and on the CIS intranet site.

### **1.4. GIFT POLICY**

The CIS Group has developed a "Gifts" policy to help employees make the right decisions when they have to offer or accept, on behalf of the CIS Group, gifts, invitations or trips as part of their activities. This policy applies to all departments and all subsidiaries of the CIS Group, worldwide. Each Country Manager may, depending on the country, establish specific rules that are more rigorous, but never less rigorous, and subject to prior approval of the General Management of CIS Group. This Gift Policy is available on the website [www.cis-catering.com](http://www.cis-catering.com) and on the CIS intranet site.

***One of our main suppliers sent me a catalogue of luxury watches in order for me to choose the model that I liked.***

*This represents a gift of high-value and which is completely unjustified. As such, this gift must be categorically refused, sent back to the sender if already received and reported to one's supervisory management.*

### **1.5. FAIRNESS, INTEGRITY AND CONFLICTS OF INTERESTS**

Integrity and loyalty must prevail in all professional relations of all staff within and outside the Group. Staff must in all circumstances engage in a fair behaviour in their dealings with CIS Group: as long as a staff member is employed by CIS or one of its subsidiaries, he or she must act in the interests of the Group and abstain from any act of a disparaging nature or criticism that could harm the Group.

Furthermore, every employee must be vigilant to avoid all situations resulting in possible conflict of interests. In any negotiation, a staff member may be faced with a situation of conflict of interests where there exists a direct or indirect personal interest in the decision that must normally be made in a completely objective manner. It is accordingly essential for this purpose to spontaneously report situations of conflict of interests in order to perform a thorough analysis of the situation and take the appropriate measures to put an end to this situation of conflict of interests.

It is possible that after this analysis of the situation and the interests involved, the situation does not present any difficulties and the interests can be compatible. However, it may also be necessary to take measures to put an end to the conflict of interests.

While conflicts of interests do not constitute in themselves criminal infractions, a staff member involved in a conflict of interest may be considered responsible for a number of related criminal offences such as corruption, traffic of influence, acquiring unlawful interests, moral or sexual harassment: these offences are severely punished in most countries.

Furthermore, the mere appearance of a conflict interests may cause reputational harm to CIS Group as well as its managers and staff.

Every employee must notify in advance in writing (e-mail or letter) the Legal Department or his or her supervising manager of all situations described below:

- Any commercial relation, under consideration or in progress, between one of the companies of CIS Group and himself (or one of its parents or one of its close relations, or a company controlled by a parent or close relations);
- Any commercial relation, under consideration or in progress, between a company competing with CIS, a supplier of CIS or a customer of CIS Group and himself;
- The acquisition of any interest or agency arrangement, under consideration or in progress, in a company competing with CIS, a supplier of CIS or a customer of CIS Group;
- Any gift or advantage, outside the scope of normal practice, proposed the receipt by a person or company having engaged, engaging or wishing to engage in commercial transactions with the Group (loan, advance, work, travel, catering services, etc.);
- And in general, any personal interest that might be in potential or clear contradiction with the Group's interests.

In the event of doubt about how a relation or transaction under consideration might be perceived, you are encouraged to discuss this with your supervising manager.

***One of the transport companies with whom CIS Group has worked for several years has offered me a position to serve as a director. Can I accept?***

*This all depends on the position you exercise within CIS, though as a general rule, if you accept this appointment, you would be tempted to give preference to recourse to this company rather than another, including in circumstances where this company is less competitive than its competitors. In effect, you would in such a case have a personal interest for CIS Group to work with this supplier. Accepting an appointment would accordingly place you in a situation entailing a conflict of interests. It is for that reason preferable that you refuse such an appointment. In any case, before making any decision, you must immediately report to your supervising manager the situation and obtain prior authorization from the Executive Management of CIS.*

***A supplier has offered me an agreement: if I guarantee that CIS will provide it with a certain volume of business, this supplier will in turn credit my bank account a commission for "referring business". Is it legal?***

*This process is entirely illegal and unacceptable. Any kickback or payment, rebate, gift, paid by a supplier to an employee is considered to constitute corruption, and the employee who is a perpetrator or an accomplice of such actions would be immediately sanctioned and may incur civil and criminal liability.*

*In contrast, it is sometimes allowed, according to applicable legislation, to provide in certain supply contracts for back-end rebates or trade discounts, if CIS orders from the supplier amounts exceeding a certain sales volume. However, these back-end rebates, discounts and other inducements must be in full compliance with applicable law and must be acquired in favour of CIS (and not one of its employees!). Whenever an employee is faced with a provision of this type in a supply contract, or has a doubt about the legality of the practices, the employee must refer to the Legal Department or his or her supervising line management for guidance.*

## **1.6. RESPECT OF FREE COMPETITION**

Competition must be freely permitted throughout the world within the limits imposed by laws governing fair trade and competition. All our business practices must consequently comply with these laws which may vary from one country to another. However, within CIS Group, there exist in addition a certain number of rules applicable to all that may be summarized as follows:

We conduct our business in a free and independent manner in all our markets. No prior agreement or understandings have been made with any of our competitors with respect to our pricing conditions, products, services to be provided, customers or commercial territory.

No information is requested from or disclosed to our competitors concerning our margins, costs, responses to call for tenders, our market share, our terms of sale and all our practices with customers or suppliers.

We do not grant any improper advantages to one customer at the expense of another.

***One of my acquaintances works for a competitor of CIS and indicated that he could provide me with very interesting information about the competitor's margins, its prices and commercial policy... I would like to take advantage of this information when responding to a next call for tenders!***

*It is strictly prohibited to exchange information and reach understandings with our competitors about our prices, services, pricing and commercial policies, etc. This obviously entails not disclosing this type of information to a competitor but also refusing to receive such information from a competitor. If you have information about one of our competitors, you must under no circumstances take it into account for calls for tenders as this would constitute unlawful collusion and is contrary to our values and laws governing fair trade and competition. In exchanges you may have with competitors, you must abstain from disclosing information about the Group but also refuse to receive any information about the competitor.*

***Can I attend trade fairs or professional meetings in which competitors of CIS also are participating without such attendance being considered to constitute unlawful collusion?***

*It is perfectly normal and even recommended to attend such trade fairs or professional meetings.*

*However, these events may in certain cases also entail risks. For that reason, such participation must be strictly limited to legitimate meetings of professional associations having an acceptable commercial, technical or professional purpose, and exclude any meeting whose objective is to reach an agreement with competitors. In the event of any doubt arising in connection with a meeting of this type that it might possibly be unlawful or suspicious, you must immediately leave the meeting and refer to your supervising manager.*

## **1.7. COOPERATION WITH PUBLIC AUTHORITIES**

CIS Group is present in many countries and committed to maintaining good relations with public authorities. National and local authorities in all countries have specific laws governing public procurement contracts destined to protect the public interest. These laws generally prohibit offering advantages to civil servants, often limiting recruitment of civil servants currently serving or having recently retired, and prohibit any behaviour that might be perceived as improperly influencing the process of rendering an objective decision.

CIS staff must be fair and precise in their relations with public authorities and adhere to extremely strict rules of ethics, moral and business conduct in their relations with the latter.

In their relations with public authorities, employees must be familiar with and respect the laws and regulations in force, and only staff authorized for that purpose may contact public officials in the name of companies of the Group.

## **1.8. CONTRIBUTING TO PUBLIC AFFAIRS**

Staff are free to contribute (without receiving any reimbursement from CIS Group) to a political party or candidate of an elective office provided they do so during non-work hours and with the assistance of their own personal financial or other resources.

Funds, assets or services of CIS may under no circumstances be used to support a candidate to an elected office, a political party, civil servant or committee in a manner that violates applicable regulations.

## **1.9. PRINCIPLES AGAINST PRACTICES INVOLVING CORRUPTION OF PUBLIC AUTHORITIES**

The Middenext Anti-Corruption Code of Conduct sets out specific rules for the fight against corruption of public officials, to which the CIS Group and its associates must comply.

## **1.10. RESPECTING RULES OF INTERNATIONAL TRADE**

CIS Group and its staff strictly respect the laws on export controls of the United Nations, the European Union, and French authorities. To this purpose, CIS does not engage in any trade with countries subject to embargoes or trade sanctions imposed by these authorities.

Any infraction of these provisions could result in severe sanctions imposed on the Group, and notably a ban on export activities. Furthermore, the Group could be subject to commercial sanctions by its customers: disqualification from call for tenders, termination of contracts, etc.

# **2. ETHICS WITHIN CIS GROUP**

## **2.1. COMPLIANCE WITH LAWS, REGULATIONS AND TAX PROVISIONS**

CIS as well as all its subsidiaries are particularly committed to adopting a role as a corporate citizen wherever it operates.

Accordingly, all CIS Group staff must comply with the laws and regulations in force on projects on which they are working within the framework of their professional activity: any situation, fact or event about which they have doubts as to its legality or appropriateness must be immediately reported to the Legal Department of the Group for guidance.

In particular, it is imperative ensure strict compliance with national and local tax regulations in the regions of operation and that everything is done within the company of CIS Group to ensure settlement of all local and national taxes owed.

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Document referenced: « Ethics charter rev 4.doc »

It is furthermore specified that all employees have an obligation to refuse any instruction given or to engage in any action requested from their management in violation of the laws and/or principles set forth in this Charter.

Any criminal or police investigation concerning the assets of the Group or Group staff within the framework of their professional activities must be immediately reported to the Legal Department, the Country Manager and the Regional Manager.

***A subsidiary of CIS Group was notified of a very significant tax deficiency assessment for an amount clearly excessive in nature. I consider that it represents an abusive tax deficiency assessment and in fact a scheme by local authorities to illicitly obtain money. However, a local tax agent offered to divide the amount of the tax deficiency assessment in half in exchange for immediate payment of an amount of money. It is in interest of the subsidiary and CIS Group to accept this transaction!***

*To the contrary, the interest of the Group and the subsidiary requires it to expressly and firmly refuse this proposal of the tax agent. If accepted, CIS and the staff concerned would become the perpetrators of or accomplices in acts of corruption. Even if this tax deficiency assessment seems unjustified or excessive, this decision is issued by a public authority with jurisdiction that must be taken into account in compliance with applicable laws and regulations. If the Management of the subsidiary concerned and CIS' Executive Management in effect consider that this tax efficiency assessment is abusive, it is their responsibility to seek legal remedy in accordance with procedures provided for by applicable law.*

## 2.2. CONFIDENTIAL INFORMATION

CIS Group discloses selected information about Group companies through its website, annual reports, press releases and any other means of communications accessible to the public. Accordingly, any information not officially made public by CIS, regardless of the source, must be considered as confidential for the purpose of safeguarding its interests.

This also applies to information concerning customers, suppliers, partners, executives and staff that must be considered confidential as well.

This confidential information is essential for CIS Group as it contributes to the promoting the value of its assets and the development of its activities. Its disclosure would adversely affect the Group and could have criminal consequences for the employees concerned (misuse of corporate assets) in addition to resulting in civil liability and the application of disciplinary measures against the perpetrating employee.

Similarly, caution is necessary with respect to the disclosure of confidential information to other employees of the Group. In effect, access to information must have a relevant relation to the functions exercised by the employee in question.

If the disclosure of confidential information to a third-party is required for legitimate reasons (partner, customer, attorney, consultant or outside advisers, etc.) one must ensure that this third party is informed of the confidential nature of the information and formally agrees to the conditions of non-disclosure. For this purpose, it is recommended to have this third party sign a confidentiality agreement for the purpose of ensuring the non-disclosure of this information.

As a general rule, any disclosure of confidential information in public places (bars, restaurants, elevators, public transit, airports, etc.) must be avoided.

Finally, concerning communications, any relations with the print or audio-visual media must be previously authorized by the Country Manager or the Regional Manager where CIS Group or one of its subsidiaries is cited, with the exception of those persons expressly authorized to communicate with outside parties within the framework of their functions. If an employee is contacted by a shareholder, this request must be immediately

forwarded to the Executive Management.

In the event of doubt about the confidential nature of information to be disclosed, we encourage you to refer to your supervising management for guidance.

### 2.3. PRIVILEGED INFORMATION AND INSIDER TRANSACTIONS

CIS is listed on stock-exchange market Euronext Paris. As such, managers and employees of CIS Group have complementary obligations with respect to privileged information and insider trading.

An insider is considered as any person having knowledge, through the exercise of their functions, of privileged information. Persons qualified as insiders include both employees of the company as well as outside persons.

Privileged (insider) information is information not accessible to the public having a potential impact on decisions by investors to purchase or sell securities or on the share price of CIS or another company. All information possessing value for an investor is subject to strict legal provisions for the purpose of preserving the confidence of the public and the integrity of financial markets. This information may be financial in nature but also concern different activities of CIS Group (the recruitment or placement of a key employee, obtaining or losing a contract, a merger project, etc.).

French Law and notably the Monetary and Financial Code (*Code Monétaire et Financier*) prohibits any insiders from trading securities (shares or bonds) of the company when they have knowledge of privileged information and provides for criminal sanctions that include up to prison sentences.

Accordingly, we recommend that when you learn of rumours or certain information relating to possible transactions, to consider such information as strictly confidential and in consequence, not to directly or indirectly make use of such information (for example through the intermediary of a member of your family or close relation) by purchasing, selling or having purchased or sold the security of CIS or financial products related to the security, and not to disclose to any person whomsoever such information.

Furthermore, you must refrain from acquiring or selling shares of CIS (or financial products related to these securities) during a period of one month preceding the publication date of the consolidated annual and interim consolidated financial statements. You will be informed by the Country Manager or the Finance Department of the publication date of these financial statements.

In the event of doubt concerning the nature of information or a suspicious transaction, we encourage you to communicate this information in writing to your supervising manager for guidance.

***Through my functions at CIS, I am aware of information that, once it becomes public, will certainly cause the share price of CIS to rise rapidly. To what extent may I be considered as an insider? Can I have a family member purchase the shares?***

*Warning: Neither you, a member of your family or a close relation may make such a transaction. In effect, you are considered as an insider. As such, you are prohibited from either purchasing or selling CIS shares as long as the transaction has not been rendered public, including through a third party (parent, friend, relation, colleague, etc.)*

*Furthermore, even if you do not intend to engage in stock market transactions, disclosure of confidential information to third parties is strictly prohibited, even to members of your family or close relations, regardless of the circumstances.*

## **2.4. USE OF ASSETS OF THE COMPANY AND ITS SUBSIDIARIES**

CIS Group makes available to its employees a range of goods, services and tools adapted to the functions of each so that all employees can effectively carry out their work. All this equipment and/or documents are the property of CIS Group. They must be protected in order to prevent any incidents of theft, damage or loss and must be returned as soon as requested to CIS Group.

This equipment and/or documents may be tangible in nature (computer equipment, telephone equipment, office supplies, etc.) but also intangible such as information or documents about the Group (organization charts, technologies, processes and methods, studies, software, marketing plans, internal advertising, business development plans, etc.)

Employees of CIS Group must use this equipment and/or documents in an individual manner. In effect, all this equipment and/or documents must not be communicated, loaned, given or exchanged, whether to a person outside the Group or other employees of the Group, for the duration of your employment with the Group and even after your departure from the Group.

Furthermore, this equipment and/or documents must be used exclusively for professional and legal purposes within the framework of missions performed for CIS Group, excluding any other usage, of criminal or inappropriate nature, or for private purposes.

CIS Group will take necessary measures to protect its equipment and/or documents through all legal means.

Furthermore, with respect to IT systems of the Group, and in order to control access and use, CIS Group has adopted an Information Services User Charter available from the Group's Intranet service. This Information Services User Charter applies to all employees and users of these IT services.

Employees undertake to strictly comply with this Information Services User Charter and the rules set forth therein.

## **2.5. THIRD-PARTY INTELLECTUAL PROPERTY RIGHTS**

All confidential information held by CIS Group respects the intellectual property rights of third parties.

CIS management and staff must not obtain confidential information (in any form whatsoever) about third parties in an abusive manner and may disclose such information only with the authorization of the latter solely to persons with a compelling need to know.

In case of non-compliance by one of CIS employee, CIS Group reserves the right to take all appropriate measures with this rule by this offending employee.

## **2.6. COMPLIANCE WITH DELEGATIONS OF AUTHORITY AND SIGNING AUTHORITIES**

All employees undertake to not enter into commitments on behalf of the Group beyond the authorities granted to them within the framework of their functions within the Group. Any person having received delegation of authorities or signature must strictly comply with the terms and refrain from making any decisions which exceed the authorities granted to him or her.

Each employee must also ensure that he or she incurs obligations on behalf of CIS or one of its subsidiaries solely for items and limits related to the scope of his or her function.

As a general rule, every employee must ensure, before entering into commitments on behalf of the Company or one of its subsidiaries, that he or she possesses the authority to do so (either by virtue of his or her employment contract, job description notice, a delegation of authority or other means) that this commitment is compliant with the instructions and guidelines given by his or her management. The employee must also, before  
*Document referenced: « Ethics charter rev 4.doc »*

implementing any decision, evaluate the financial, legal, labour-related or other consequences of the transaction under consideration for the Group.

In this respect, we invite all employees to be particularly vigilant with respect to the consequences of letters, e-mails and other correspondence they may produce within the framework of their functions.

All employees are responsible vis-à-vis their supervising management of actions taken by them in the name of the Company and/or its subsidiaries, exceeding the authorizations, powers, delegations, instructions or guidelines given to them.

## 2.7. CONFIDENTIALITY OF PERSONAL DATA

The confidentiality of personal data of Group employees must be respected at all times. Employees must collect, use, record, process and communicate information of a personal nature in compliance with the policies of CIS with respect to confidentiality and applicable laws.

CIS Group undertakes to safeguard the personal nature of information collected within the framework of your functions. Access to this information is possible only subject to prior consent of the employee concerned, except for information and formalities required to comply with legal obligations in each country where CIS Group operates (notably requests for visas or working permits).

Employees responsible for maintaining these records or having access to personal information about Group staff guarantee that such information is not improperly or illegally disclosed.

## 2.8. HUMAN RESOURCES POLICY – EQUAL OPPORTUNITY EMPLOYMENT

Motivation, professionalism and team spirit of our staff are essential for meeting our objectives. Employees in consequence have an obligation of mutual assistance and respect.

Every year, many employees join CIS Group from throughout the world and all are welcome, regardless of their gender, nationality, ethnic origin or nationality, caste, age, physical condition, disability, religion, political opinions or philosophy, membership of labour unions, sexual orientation or other distinctive attributes. Employees must work with their colleagues and customers, commercial partners and other stakeholders in a manner that conveys the same respect for all and that does not take into consideration either differences or similarities.

With respect to recruitment, remuneration, access to training, advancement, terminating the relationship of employment or retirement rights, CIS Group actions are based on an objective evaluation of the qualifications and qualities required for the position. In all areas, and as a general practice in all working relations, employees must abstain from all forms of discrimination, whether active or passive.

It is the responsibility of each department head to ensure the training for each member of his or her team for the tasks they are assigned (including with respect to health and safety) and to regularly evaluate their skills, progress, and define with them areas for improvement, difficulties encountered, etc.

***For several months I have been engaged with a non professional relationship with my assistant. Should I report this to my supervising management?***

*Personal relationships between colleagues can in certain cases result in conflicts of interest. This is the case when a relationship exists between a member of the same team or between a line manager and a subordinate. In this example, you may be tempted to advantage your assistant over other members of your team. Furthermore, we warn you that relationships between a manager or supervisor and a subordinate could be considered as from outside as constituting moral or sexual harassment. Consequently, we advise you to speak to the Human Resources Department in order to prevent any suspicion of conflict of interests, while respecting your private life and professional situation of stakeholders.*

## **2.9. PROTECTION OF CHILDREN AND UNDERAGE WORKERS**

The Group CIS adheres to the United Nations Global Compact and is committed to the effective abolition of child labour.

As such, it is not permitted to use employees under the legal working age regardless the country or local jurisdiction. If no age limit is set, individuals must be at least 15 years old.

Regardless of the minimum legal age, and where minors are permitted to work, we expect all our employees and third parties to comply with all legal requirements, particularly those relating to working hours, wages, skill levels and working conditions.

Any work that may be mentally, physically, socially or morally dangerous or harmful to workers under the age of 18 is strictly forbidden to underage employees.

## **2.10. PROTECTION AGAINST HARASSMENT**

No form of harassment, whether physical or in written form, electronic or oral, targeting any person, employee, supplier, subcontractor, customer or other, will be tolerated within CIS Group and will be dealt with in accordance with rules applicable in each country where we operate, in addition to disciplinary sanctions that will be applied to the employee engaged in such actions.

An employee who is a victim of harassment, or who suspects a person is a victim of harassment by another CIS employee, must immediately notify his or her supervising management and/or the Human Resources Department to evaluate the situation of harassment and take the appropriate measures.

## **2.11. SUSTAINABLE DEVELOPMENT AND ENVIRONMENTAL PROTECTION**

Each employee contributes to CIS Group in reaching its sustainable development objectives by supporting economic progress, environmental protection and social development. One means of achieving this objective is taking the appropriate measures to improve quality of life in the communities and countries where CIS Group operates.

CIS deals with all stakeholders in a socially responsible manner within the framework of sustainable development approach.

Furthermore, CIS encourages all employees to contribute to sustainable development actions in countries where projects are underway. In effect, everyone can contribute to this approach by encouraging open dialogue with stakeholders about contributions and CIS' economic, social and environmental performances, subject to applicable rules governing confidentiality.

Given the nature of our activity, all CIS staff must ensure compliance with laws and regulations on the environment and, more generally, are required to respect the environment and contribute to energy savings, regardless of where they work.

Furthermore, all Group staff involved in the management and development of CIS' activities are required to possess knowledge about the rules and principles applicable to environmental protection. Any risk of pollution and/or abnormal energy consumption must be reported to the Country Manager and the Regional Manager.

Every employee must actively contribute to CIS Group's environmental approach and reduce negative environmental impacts of our activities.

## **2.12. HYGIENE – HEALTH AND SAFETY – SUBSTANCE ABUSE**

We remind every employee that application of the most rigorous rules of hygiene is critical for our activity. The consequences of a failure or lapse in this area could be disastrous for the Group's image and continuing

operations. Accordingly, every employee must personally ensure compliance with these rules of hygiene.

Furthermore, we have an obligation vis-à-vis our colleagues, their families and communities, to protect the environment and safety of everyone at their places of work. CIS Group has adopted an extremely rigorous health and safety policy (including notably an obligation to comply with ISO and OHSAS standards for security, quality and the environment) to protect the life and health of its staff.

CIS Group must follow two basic rules: work in complete security and protect oneself at the same time as one's colleagues, community and the environment.

Security also depends on strict adherence by each employee destined who operates a vehicle to applicable driving and road safety laws and regulations in force. All employees convicted of violations of driving or road safety regulations by a government authority will be personally responsible for this offence and personally sanctioned.

You must know the laws and policies applicable to CIS Group and comply with them, particularly if you have responsibilities in areas subject to safety and/or environmental regulations.

Similarly, use, possession or consumption of alcohol, narcotics and illicit drugs is strictly prohibited on CIS premises and those of its subsidiaries, as well as the sites of projects or during working hours. To this effect, and to the extent in the light of the functions, a state of inebriation could potentially put people or property at danger, CIS reserves the right to ask for all drug and alcohol tests be conducted on staff. It is also noted that many of our customers perform their own tests on CIS staff at operating sites.

As a general rule, CIS Group prohibits possession, use, distribution or consumption of alcohol or illicit substances during working hours or at places of work by all staff.

***I was arrested by the police for speeding and must now pay a fine. As the vehicle I was driving was made available to me by CIS and I was driving in connection with my professional activities, shouldn't CIS pay the fine on my behalf?***

*It is the responsibility of every employee to strictly adhere to rules and regulations governing driving and road safety. In consequence, drivers fined for violating such regulations must be personally responsible vis-à-vis the relevant authorities, and even if the vehicle driven has been provided by CIS, and even for the purpose of the needs of CIS or in connection with their function or for the purpose of going to work. CIS shall under no pretext be held liable for non-compliance by one of its employees with applicable laws and regulations and firmly condemns such behaviour.*

***With respect to alcohol consumption, what sanctions will I be subject to if I test positive at a site or my place of work?***

*CIS Group applies a zero-tolerance in the area of the consumption of alcohol and illicit substances. In consequence, any employee under the influence of alcohol or drugs at his/her place of work will be immediately excluded from the project or place of work and subject to a disciplinary sanction that may go as far as dismissal for serious misconduct.*