

Ethics Code

Tessi Group



tessi

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LETTER FROM THE CHAIRMAN

As a provider of trusted solutions and services for companies' digital transformation, Tessi operates in markets where organisations' reputation, compliance and reliability are necessary to survive.

We must all protect and promote Tessi's culture and values, in particular transparency and honesty, in line with our CSR approach.

That is why each of us must commit ourselves to an irreproachable professional code of ethics. Individually and collectively, ethics must guide our decisions and actions.

This ethical code guarantees Tessi's integrity and our commitment to assuming our responsibilities in terms of society, our employees, customers, stakeholders, and the environment.

We have created it to serve as a common reference to help us adopt behaviour that is consistent with our values as we carry out our work. Ethics and compliance is everyone's responsibility.

I would like to thank you for your involvement in preserving the Tessi DNA and continuing to make us a success. We can all be proud.

Claire FISTAROL

Chairman of the Management Board



PRESENTING THE ETHICS CODE

Tessi has successfully built our customers' and employees' trust through close relationships, rigour, responsiveness, and adaptability.

The Group signed the UN Global Compact in 2011 and is committed to respecting the laws and regulations in force in each country where Tessi does business, with particular reference to:

- the Universal Declaration of Human Rights,
- the United Nations Guiding Principles for Business and Human Rights,
- the fundamental conventions of the International Labour Organization (ILO).

In 2010, Tessi formalised its ethics commitment in a charter. Today, this commitment is evolving with the present ethics code that has been integrated into our sustainable development policy.

This ethics code is intended for all employees of Tessi's subsidiaries worldwide and should be used to make the right decision in any circumstances wherever you are.

Whatever their level of responsibility, each employee must read, understand, and respect this code.



IN CASE OF DOUBT...

The purpose of this code of ethics is to define and illustrate the different types of behaviour to be avoided as illegal or contrary to the guidelines.

However, it does not purport to provide an answer to all the ethical issues that may arise in your work.

Therefore, we encourage each of you to exercise common sense and discernment in dealing with various situations, in accordance with Tessi's values and in compliance with the law.

In case of doubt as to the attitude to adopt or to report a violation (real or presumed) of the ethics code rules, you must, depending on the context:

- speak to your direct manager (to be preferred as much as possible)
- talk to your human resources manager
- use the «internal alert» procedure available through human resources (as a last resort).

Tessi will not accept any form of retaliation against an employee who, in good faith, expresses concerns or assists in the investigation of alleged violations of the ethics code.

«Good faith» means a person who submits a concern without malice and without seeking personal gain, with a plausible reason to believe in its truthfulness.

As a moral reference, if you are confronted with a situation of which you are not sure of the implications, ask yourself the following questions:

- Am I being just and honest: are my actions legal?
- Is it the «right» thing to do; does the situation fit Tessi's values and ethics code?
- If I take a step back, is my behaviour acceptable? Can I speak openly about my attitude to friends, family, co-workers, superiors, or subordinates?

GENERAL RULES OF GOOD BEHAVIOUR

WORKING CONDITIONS AND RESPECTING EMPLOYEES' RIGHTS

▶ The Tessi Group's commitment

Tessi complies with international labour standards¹, particularly those relating to the worker protection and the prohibition of forced and child labour in order to guarantee working conditions in which fundamental human rights are respected. Therefore, Tessi prohibits all forced or concealed work in all its subsidiaries.

We are also committed to improving working conditions and preventing occupational risks, in particular by setting up specific training courses.

Tessi respects its employees' rights and protects personal privacy.

Furthermore, an active corporate dialogue is held with staff representative bodies that respects union independence and pluralism.

▶ In practice

Tessi asks everyone to comply with:

- the code of conduct, its annexes and the rules of good behaviour
- the Universal Declaration of Human Rights (available at your HR department)
- local regulations in force for their professional activities.

More generally, employees are asked to do their best to work together in a pleasant environment and treat people with respect and courtesy. In their professional activities, they constantly demonstrate a neutrality of opinion and respect everyone's differences and commitments.

¹ ILO fundamental conventions no. 29 (Forced Labour), no. 105 (Abolition of Forced Labour), no. 138 (Minimum Age) and no. 182 (Worst Forms of Child Labour).



HEALTH AND SAFETY AT WORK

▶ The Tessi Group's commitment

Tessi endeavours to fully implement the legal provisions on safety and health protection in the workplace. In addition, Tessi maintains an active occupational health and safety prevention policy and ensures it is applied continuously.

Tessi asks any sub-contractors and suppliers to be as vigilant as we are.

Tessi maintains a dialogue with staff on matters related to health and safety at work.

▶ In practice

Each employee is responsible for:

- taking note of safety instructions
- keeping his/her work environment in compliance with the company's safety rules
- working with respect for everyone.

FIGHTING DISCRIMINATION AND HARASSMENT

▶ The Tessi Group's commitment

Tessi's policy is to not discriminate, for whatever reason, in hiring and in employment relationships.

As such, Tessi does not discriminate against any person on account of sex, marital status, sexual orientation, age, marital status, pregnancy, genetic characteristics, membership or non-membership, real or supposed, of a particular ethnic origin, political opinions, political or trade union activities, religious beliefs, physical appearance, last name, or, unless the professional incapacity has been established by the occupational physician, by reason of his or her health status or disability.

Moreover, no employee should be subjected to acts likely to characterise a case of moral or sexual harassment. Tessi will take all measures needed to prevent such acts.

▶ In practice

Tessi tolerates no form of discrimination or harassment in professional relationships.

Each employee has the duty to behave towards the persons whom he/she is called into contact with dignity and in full respect of their physical and moral integrity.

RESPECTING CLIENTS

▶ The Tessi Group's commitment

Tessi places customer satisfaction at the heart of its concerns.

To this end, Tessi works to deliver an impeccable quality of service in compliance with the regulatory framework and always to apply quality improvement processes, taking account of customer comments and structural and cyclical developments in their markets.

For Tessi, acting responsibly in its activities also means creating an innovative range of useful products and services which serve as sustainable answers to its customers' and partners' essential needs.

▶ In practice

Employees must respect the procedures that apply to their role, in particular, those that serve to meet customer service objectives.

In their relationships with customers, employees must show good faith and be loyal and honest.

PROTECTING THE ENVIRONMENT

▶ The Tessi Group's commitment

Tessi strives to improve its policy for managing its production centres by ensuring that projects' environmental and social impacts are properly taken into account.

Respect for the environment is integrated into everyday activities to reduce energy or paper consumption and to ensure waste products are recycled.

▶ In practice

Employees must pay attention to:

- optimising their electricity consumption, performing simple eco-friendly actions (turning off lights and PCs, not opening windows when the air conditioners are on, etc.)
- sorting their waste using the recycling bins made available

PRIVACY AND PROTECTING PERSONAL DATA

▶ The Tessi Group's commitment

For Tessi, securing information systems is a strategic focus to ensure the availability, integrity, confidentiality and traceability of information while maintaining the trust of its customers and partners.

That is why Tessi is committed to full risk analyses through a preventive approach to business processes and a policy of data confidentiality and security.

An information system security policy is in place for the whole of the group.

Tessi takes special care to respect legal measures when processing private data automatically.

Similarly, Tessi ensures that others' intellectual property is respected and prohibits any unauthorised reproductions.

▶ In practice

Every employee is contractually responsible for confidentiality. Furthermore, information belonging to Tessi or its clients may be sensitive or require professional discretion.

All staff is therefore prohibited from divulging information to third parties or Tessi employees who are not permitted to have knowledge of the confidential information to which he/she has access.

Also, employees are prohibited from using, directly or indirectly, for personal use any confidential information that he/she may have access to as part of their assignments.

Each employee must respect rules of security in processing information, in particular, the IT charter.

In compliance with regulations, each employee has an individual right to access and correct data that concerns them. This data is available upon request from the recipients of the information. In addition, each employee has the right to object, on legitimate grounds, to the processing of personal data concerning him or her.

All requests for information from the press must be addressed to the Marketing and Communication department.

TRANSPARENCY OF INFORMATION

▶ The Tessi Group's commitment

Loyalty to our customers and suppliers is a principle for Tessi in order to establish and maintain lasting relationships of trust.

Tessi shareholders and partners, as well as public organisations, rely on the accuracy and specificity of the information contained in our documents. In particular, Tessi is faithful, transparent and exhaustive in its operations in its accounts.

▶ In practice

Employees must ensure that the information provided in the course of their assignments is accurate, timely, complete, correct, and comprehensible.

In particular, each employee undertakes not to falsify documents or data in order to deceive readers or to hide illegal activity. Compliance with the applicable internal control procedures is essential, in particular in preparing financial documents.

INSIDER TRADING

▶ The Tessi Group's commitment

Insider trading involves disclosing information that is not known to the public and, if it were, would have a positive or negative impact on the value of listed securities.

▶ In practice

Employees must not disclose or use the privileged information to which they have access in performing their duties, whether they relate to Tessi or a company with which they are directly or indirectly related, to perform, recommend or advise against securities transactions on behalf of themselves or others.

FAIR COMPETITION

▶ The Tessi Group's commitment

Tessi undertakes to act in strict compliance with the rules and laws relating to competition applicable in the countries in which it operates.

▶ In practice

It is prohibited to enter into agreements or conduct which would restrict or impair free competition.

Exchanging or divulging commercially sensitive information concerning competitors, customers, or suppliers may also constitute an infringement of competition rules and the duties of loyalty and confidentiality to which all employees are subject.



CONFLICTS OF INTEREST

▶ The Tessi Group's commitment

Each employee must avoid allowing his or her personal interests, direct or indirect, to come into conflict with those of the Group.

Tessi does its utmost to prevent such situations arising, in particular by:

- regularly analysing the risk factors to which the company is exposed
- raising employees' awareness of this risk
- applying inspection procedures

▶ In practice

Employees must avoid any situation in which their personal interests, or those of their relatives, may or may appear to influence the impartial and objective performance of their duties.

Situations of this kind are numerous and varied in nature.

In accordance with their duty of loyalty, employees must refrain from competing with Tessi's business.

FIGHTING CORRUPTION

▶ The Tessi Group's commitment

Tessi opposes any form of corruption in its relations with business and institutional partners.

An analysis of the risks of corruption and trading in influence is carried out and kept up to date to guarantee constant operational control.

The expense policy sets the rules and limits for gifts in business relationships.

▶ In practice

Modest business lunches, invitations, and gifts of a symbolic nature may be offered or accepted as part of normal business practices and in accordance with the codes of conduct of customers, suppliers, or other partners. They are signs of courtesy and appreciation. However, these gestures must be legitimate and not seek to influence a business decision.

Employees must not solicit, receive, or offer gifts, bribes, or retro-commissions with a view to obtaining or keeping an undue contract or advantage.

Staff is regularly informed and trained on these issues.

POLITICAL NEUTRALITY

▶ The Tessi Group's commitment

Tessi is not associated with any political parties and does not contribute to their financing.

▶ In practice

Any employee participating in a political activity must do so outside his/her working time without claiming membership in Tessi and without using company resources (telephone, e-mail, letterhead, etc.).

SPONSORSHIP

▶ The Tessi Group's commitment

Sponsorship or payments to organisations, whether charitable or otherwise, must be part of Tessi's policy and within the strict limits of regulation.

▶ In practice

Donations to private or public bodies may be allowed if not prohibited by local laws or contrary to Tessi policy. This type of contribution must be approved by the Board of Executives.

INTERNAL INSPECTION MEASURES

The correct application of these rules is guaranteed by:

- management, by exercising daily control over employees' work
- a system of permanent and periodic controls managed both within the entity and at the group level,
- an internal alert system (see procedure)

No act of corruption or practice contrary to these guidelines will be tolerated.

The principles set out in this ethics code are governed by applicable laws, regulations, or rules within Tessi. In the event of non-compliance, the employee's personal liability may be incurred.

Any action considered to be at fault may, depending on its gravity, be subject to punishment as provided for in the internal rules.

In addition, each employee involved is liable to prosecution in the relevant court.

In the event of non-compliance with the rules of confidentiality and/or information security, it may be decided as soon as the facts are known to immediately suspend the access rights of the employee concerned to the information systems.





tessi

Tessi S.A.
177 cours de la Libération
38029 Grenoble Cedex 2
T +33 (0)4 76 70 59 10
www.tessi.eu