

# *Ethics Code*





# Chairman's Message

**Richard THOMAS**  
Chairman

*In order to have a full understanding of the company, we give you this ethical code which was specially made for you and which we hope will give you an overview of the Group and its values.*

*All the Camusat team is very proud to have accepted the new challenges of the telecom market and to have known seizing technological development opportunities by committing to achieve its mission: exceeding customers' expectations but also supporting their effort to develop and optimize their networks as effectively as possible.*

*Our path to sustainable development and customer satisfaction also and particularly depends on each member of our staff. We are committed to favor men and women development within the company regardless of their origins or histories, to guarantee thus equal opportunities and to highlight the diversity which makes our richness. It is everyone's responsibility to ensure the safety of the employees and their well-being among us but also to ensure environmental compliance and to adopt an ethical behavior.*

*Do not hesitate to contact our Human Resources Departments which will be happy to provide you any additional information you may need.*

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# Our Values



*Camusat Group values make-up its genetic code and guide all the staff members all over the world in their day-to-day activities.*

## **Diversity**

*Diversity is the key of our success. We know that nothing would be possible without the diversity of know-hows, cultures and the individual richness of our employees. Diversity is not an objective in itself but rather be an essential richness to achieve our daily missions. Included in our commitments in terms of corporate social responsibility, it is also a social and economic performance factor for our Group. Equal treatments and cultures sharing contribute to create an open, responsible and solidary corporate culture, ensuring internal cohesion and progresses.*

## **Reactivity**

*Reactivity is a strength and a need on the telecom market which is continuously changing. Camusat Group knew how to implement an organization based on quickness in new ideas identification, in the making decisions and in their implementation to meet all its customers' expectations.*

## **Innovation**

*Innovation emerges from the encounter between passion and constant desire of meeting the challenges of tomorrow. It is the fruit of the encounter between our talents and collective competence. The various competences of Camusat Group through the diversity of its business lines work in synergy with each other which enables to create an innovative dynamic. Innovation is the key of the sustainable growth of Camusat Group.*

# Respect for Human Rights

*Respect for Human Rights is one of our fundamental commitments. Aware of our responsibility, we must be exemplary.*

*Based on a long-term basis in many countries, Camusat commits to its stakeholders, both internal and external, to respect Human Rights in its field of activity. In association with governmental authorities of host countries where the Group operates and in respect for their sovereignty, Camusat commits to a constructive exchanges approach with stakeholders who are likely to be impacted by its activities.*



## Respect for Rights and Laws

*Camusat Group respects laws and regulations in all countries where it operates. Each member of staff must respect the applicable law in his business environment and shall avoid behavior and activities which may result in him or other members of staff, his company or the Group being drawn into illegal practices.*

*Whilst it may be unfair to require members of staff to become specialists in the legislation governing their professional activity, each member must obtain sufficient knowledge of the rules of law applicable to their activities. Such minimal knowledge helps to determine when to seek advice from hierarchy, legal departments and possibly from the Human Resources Department. Compliance with rules concerning the working environment and employment, health and safety as well as the protection of the environment requires special vigilance.*



# Good Business Practices



***We have – and we must maintain – healthy and long-term relationships with all our stakeholders (clients, employees, suppliers, governments). In this regard, everyone must:***

## ***Adopt a fair and honest behavior***

*Our customers are the very reason we exist and we have the ambition to establish long-lasting relationships with them. We commit ourselves to behave honestly and fairly with them, regardless of their size or region of location.*

## ***Ensure mutual interests***

*As part of Camusat development, we offer a range of products and services which gives the client a high value added solution. Any price and performances negotiation must be done for the purpose of being beneficial for both client and company (financial input, strategic contribution or reputation).*

## ***Respect our contractual commitments and applicable regulation***

*We observe the contract which binds us with the client, in order to deserve its trust and provide the service, essence of the contract. We run our commercial action in the respect of applicable laws to the contract. The established contract should define accurately the type of the service to be provided as well as pricing conditions, delays in the delivering, delivery terms, payment terms, after sales service conditions, warranty terms and conditions of recourse in the event of any dispute.*

## ***Ensure a transparent commercial communication and advertisement***

*We communicate in total transparency about our offers on products and services. We prohibit misleading advertising. We outline the actual characteristics of our products and services to clients to make a well informed decision. We are committed to not denigrating our competitors.*

# Good Business Practices

## Refuse any kind of corruption

We prohibit any practice designed to influence clients' decision by offering advantages, directly or thanks to any person who intervenes in the selection process set up by the client. Similarly, within the context of our relationships with our suppliers and subcontractors, we strictly ban any kind of corruption or bribery or any bargaining engaging external personal interests for the strict need of an order.

Within this framework, we must obtain from our partners, prior to initiating any business relations:

- A commitment without ambiguity of refraining from such practices, directly or indirectly,
- A sufficient visibility on conditions granted to its own clients to enable to effectively monitor compliance with the undertaking, without calling into question its freedom to negotiate.

As well, in the frame of a partnership, we ensure that:

- The partner's level of pay is reasonable and proportionate the provided services,
- This compensation is paid in a transparent way (clear identification of the recipient of the compensation, who must be the contracting party...).



## Conflicts of interests

Given his duty to be loyal towards the Group, each member of staff shall not put himself in a situation of conflict of interests; that means avoid undertaking directly or indirectly another activity or even participate in a decision that would favor his own interest or that of one or many of his relatives, although this activity or decision would not be made to the detriment of the best interest of Camusat Group.

### Thus:

Each employee shall obtain written permission from the Regional Director before entering an agreement with a company of which he or a member of his family is an investor or a director; the Regional Director will inform the Group Executive Committee beforehand,

No member of staff shall accept a mission nor any external work offered by a supplier, client or competitor which may affect their performance or judgement in their work for Camusat Group,

Each employee must inform his hierarchy of any professional mission or external work and more generally of any conflict of interest.

It is thanks to everyone's good sense and professional conscience that conflicts of interests are avoided.

Business good practices must be based on honest and fair deals as well as on professional behaviors in order to make our partnerships lasting and strengthen our reputation.

# Protection of intellectual property



**Intellectual property is Camusat's first asset; it is a high value asset. It is the sum of all information or data of a technical, commercial or financial nature, which define our Group uniqueness and allow being and remaining competitive in providing products and solutions.**

*The intellectual property can be in some cases protected by industrial property legal titles (patents, brands, designs and models) or by literary and artistic property rights (copyright, software...). Management and protection of these assets is everyone's duty in order to ensure our group development.*

## **Camusat Group commits to:**

- Take appropriate protective measures in respect of the ideas or creations we believe innovative (design and models, technologies, software...),
- Check that information or data of intellectual property that we want to use or acquire do not infringe any copyright or other property rights of any third party,
- Respect intellectual property rights from creation or inventions developed within the company, in accordance with applicable regulations.

## **Use of social networks**

**Social networks must be used with caution, even for personal use. No message containing confidential information shall be disclosed, neither abusive or insulting comments nor comments not respecting Human or our Group.**

*We also recommend our employees to respect regulations on protection of personal data, particularly when they post pictures.*





# Respect for confidentiality



**Each Camusat employee has knowledge of confidential information that form a part of Camusat's know-how and intellectual property.**

Each employee must ensure to not disclose information directly or indirectly to any third party and ensure effective protection of those data.

## **Confidential information includes:**

- Data on projects, ongoing contracts, manufacturing, processes, know-how, not yet published patents, software ...),
- Information concerning our products or services (such as plans, technical characteristics, cost price...),
- Information concerning our customers, suppliers, subcontractors, partners.

## **External communication:**

We may share confidential information with stakeholders (clients, suppliers, consultants...) and thus contribute to bring our proximity and transparency values to life.

We also have to be extremely cautious about confidential information entrusted to us by our clients on the occasion for instance of co-development projects or led on their behalf. We have to be proud of this trust, sign of a reliable relation that has been patiently built and of a renowned professionalism, and bolster this confidence by preserving confidentiality.

Furthermore, we commit not to take a personal advantage of the use of information belonging to the company by disclosing it to third parties.

# Respect for persons

**Camusat Group attaches particular importance to the behavior of its staff: everyone should act towards others with due respect inherent in maintaining a high level of professional reputation.**

This concerns notably the respect of persons' rights, dignity and culture. Ethics imposes a code of conduct that prevents employees from behavioral divergences and thus contributes to make everyone act in the respect for others, in order to avoid any nuisance to the Group's image.



## Social Dialogue

***Social dialogue is at the heart of harmony between people. It aims to constantly searching for consensus and is a fundamental ingredient for social conflicts reduction.***

*Promoting social dialogue is allowing everyone to have its own voice. Our group is sensitive to everyone's right to freely express his or her opinion and encourages all managers to talk with their teams during dedicated moment. Social dialogue goes together with trusting relationship at all levels. Camusat commits to ensure a transparent communication to its employees and to provide them regularly with news about the group, rights and duties of each and to make available information tools adapted to local context.*



## Diversity



***Promoting diversity and equal opportunities is a fundamental responsibility for Camusat who has engaged a non-discrimination approach aiming at encouraging access to the employment market for those for who it is the most difficult on one hand; and at refusing any type of discrimination in career terms on the other hand.***

*We treat all our colleagues and stakeholders with the same respect and dignity, regardless of their position in the organization, sex, age, religion, habits, sexual orientation, family situation, origin, genetic characteristic, membership or non-membership, actual or supposed, of a specific ethnic group, nation, race, union or mutualist activities, physical appearance, surname, health condition or disability. We are convinced that diversity, source of openness and creativity, produces values for the company and its staff. This belief is evident in our actions: recruitments, granted promotions, pay rises and training...*

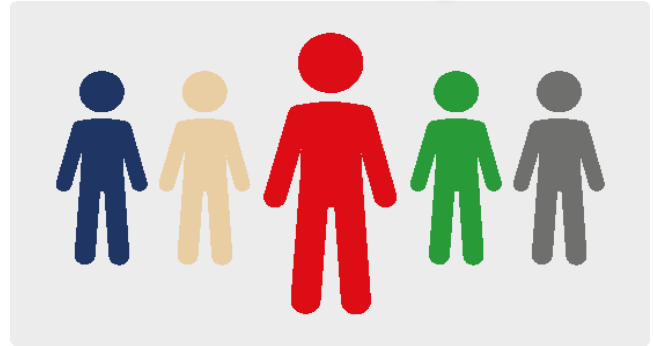
*Respect for the individual, excluding any violation of the non-discrimination principle and of the respect of private life, is at the heart of our social concerns.*

# Supplement for managers (1/2)

## The manager's role

*As a Manager, you have an added responsibility because:*

- *You set an example and promote ethical conduct,*
- *You are a decision-maker faced with more complex and difficult issues,*
- *Your team will come to you for advice and help.*



*And as a manager, you will also deal with subjects which are generally only encountered at a managerial level, namely:*

- *Product and services commercialization,*
- *Suppliers selection and their fair treatment,*
- *Competition.*

## Product and services commercialization

*The success of our products is based on their qualities and performance. They are essential to winning and keeping our customers' trust and loyalty.*

*All of us involved in product and services commercialization activities must:*

- *Give a fair, precise and truthful description of our products and their effects,*
- *Clearly express the purpose and correct usage of our products and take care that it is readily understood by customers.*



## Suppliers selection and their fair treatment

- *Camusat's relationship with its suppliers extends beyond the purchase of goods and services.*
- *It is integral to the long-term success of our Group. We are judged by the quality of the relationship we have with our suppliers.*

# Supplement for managers (2/2)

## **Each one of us who is in contact with a supplier must:**

- *Encourage suppliers selection on the basis of open competitive bidding,*
- *Be transparent about the bidding process,*
- *Ensure that our Purchase and Payment General Terms which include our ethical expectations are understood and respected by all suppliers wherever they operate,*
- *Support suppliers in meeting Camusat's expectations,*
- *Pay suppliers on time and according to the agreed terms to the extent they have fulfilled their obligations,*
- *Make sure that our suppliers are not overly economically dependent on Camusat business,*
- *Protect the suppliers' confidential information, and in particular make sure to respect their copyright and intellectual property rights.*



## **Competition**

*We respect all stakeholders in our professional sphere, including competitors. We treat them the way we would like them to treat us. Sharing any type of information such as pricing, costs or marketing plans with competitors can lead to the appearance of price fixing, territorial division or other types of manipulation or distortion of the free market.*

## **Each one of us must:**

- *Avoid any contact with our competitors on confidential question,*
- *Avoid to encourage our clients or suppliers to break off contracts they may have with our competitors,*
- *Refrain from taking action to cut off a competitor's sources of supply,*
- *Refrain from establishing exclusive contracts without prior legal advice if Camusat could be considered to hold a dominant position in the market,*
- *Refrain from denigrating our competitors,*
- *Promptly disclose to our management if we have inadvertently received or used proprietary or confidential information which relates to competitors,*
- *Gather information about competitors only by legal means and always by identifying clearly as a Camusat's staff member.*

# Implementation of the Code of Ethics

*Each group entity will be responsible for implementing these rules taking into consideration any constraints or specificities that may be linked to its activity or geographical location.*

*The respect and application of the rules mentioned in this code of practice relate to all members of staff, according to their positions and responsibilities.*

*For this purpose, everyone has a duty to be vigilant for what he may be concerned with, but also with his relatives, within his team or in respect of persons under his responsibility.*

## **ETHICS ALERT**

*If you are faced with an ethics problem, please advise the Subsidiary Director, early enough to enable the latter to give a relevant advice or to make the appropriate decision.*

*Furthermore, it is the superior's and executives' responsibility to help staff members to resolve problems they may face. In case of doubt, legal and human resources departments can be consulted. You can also use the ethics alert by sending an e-mail in your preferred language to the following address: **[ethics.alert@camusat.com](mailto:ethics.alert@camusat.com)***

*No sanction may be taken against a staff member who has reported a violation of the present code in good faith.*

## **THE ALERT CONTENT**

*Only facts, data and objectively formulated information which directly concern fields mentioned in this code could be taken into account.*

## **THE ETHICS ALERT RECIPIENTS**

*Data and information are transmitted by the alert issuer to the Group Chief Ethics Officer and only him. For this purpose, the Group Chief Ethics Officer is bound by a reinforced obligation of confidentiality.*

*While ensuring confidentiality of the alert issuer identity, the Group Chief Ethics Officer will make sure when recording and then treating the alert to only communicate necessary data and information to the verification and treatment of the alert. More generally, any person in charge of collecting and/or treating a professional alert commits to respect a reinforced obligation of confidentiality and not to make use of data and information for wrong purposes.*

## **THE ETHICS COMMITTEE**

*Ethics alerts are then transmitted and analyzed during Group Executive Committees with gather all representatives of the different departments.*

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