



Overview of the Charters, Codes and Procedures structuring the Group ethical and corruption risks management program

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CNIM aims to be a benchmark in all its core business segments: Environment, Energy, Defence, Security and High technology; and is fully committed to its international expansion.

In its business operations, CNIM promotes:

- A culture of integrity and compliance based on adherence and adaptation to the latest ethical standards and legislation applicable in France and in all countries where its employees operate and its activities are run;
- A zero tolerance policy against corruption in all its forms.

In this context and given, amongst other considerations, the recent enforcement of the French law addressing transparency, anti-corruption, and economic modernization, also known as Sapin II, the Group has updated and completed its management program addressing ethical and corruption risks. The body of documents giving structure to this program, effective from now on, is made of the following charts, codes and procedures and applies to CNIM and its subsidiaries.

It is the responsibility of each individual to act in accordance with the rules and principles contained thereto. The Group General Counsel is at your disposal to help with any questions or concerns.

Nicolas DMITRIEFF
Chairman of the Management Board

	Scope	Publication
<u>Charter of Ethics</u>	<ul style="list-style-type: none">→ Sets out the values that all the employees are expected to adhere to in the course of their work:<ul style="list-style-type: none">- <i>Respect for individuals and their work;</i>- <i>Respect for health, safety and environment;</i>- <i>Compliance with laws and regulation;</i>- <i>Loyalty and integrity.</i>→ Does not replace but supplements internal rules and regulation and other applicable internal procedures, codes and charters.	<p>CNIM Inside Portal</p> <p>CNIM website</p>

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Anti-corruption <u>Code of conduct</u>	<ul style="list-style-type: none"> → Defines and illustrates the different types of behaviour considered to be characteristic of bribery or influence peddling and therefore prohibited. → Provides ethical behaviour standards which should guide every employee in making the right decisions in business. <ul style="list-style-type: none"> - <i>Gifts and invitations;</i> - <i>Gifts to charitable or political organizations;</i> - <i>Patronage and sponsorship;</i> - <i>Facilitation payments etc.</i> <p>CNIM refers to the Middlednext Anti-corruption Code of conduct, the product of extensive consultation and experience among its member companies</p>	<p>CNIM Inside Portal</p> <p>CNIM website</p>
Purchasing <u>Code of Ethics</u>	<ul style="list-style-type: none"> → Defines the rules of behaviour and ethical standards with which all CNIM Group staff involved in Purchasing, either directly or indirectly, as main activity or part-time, must comply. 	<p>CNIM Inside Portal</p> <p>CNIM website</p>
<u>Modern slavery act transparency statement</u>	<ul style="list-style-type: none"> → Defines the policy applied by the Group to prevent the risk of slavery and human trafficking in its relationships with suppliers, in accordance with the Modern Slavery Act – 2015. 	<p>CNIM Inside Portal</p> <p>CNIM website</p>
Gifts and hospitality <u>procedure</u>	<ul style="list-style-type: none"> → Defines the acceptability conditions and recording requirements relating to gifts and invitations either received or given; → Applies to all the employees facing the situation of giving or receiving gifts and hospitality to or from external parties. 	<p>CNIM Inside Portal</p>
HR <u>charter</u>	<ul style="list-style-type: none"> → Defines the requirements applicable: <ul style="list-style-type: none"> - To the HR functions responsible for employee related hiring, on-boarding and annual assessment processes; - To all the employees and their managers as regards the management of conflicts of interests. 	<p>CNIM Inside Portal</p>

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<p>Selection and management of sales agents <u>procedure</u></p>	<p>→ Defines the requirements applicable to the selection, assessment, authorization and monitoring of sales agents with whom a business relationship is contemplated or ongoing.</p> <p>→ Functions concerned : Sales Managers, Business Developers, Compliance Officers, Directors (at Sector, Division, Business Line level), Finance and Legal Divisions.</p>	<p>Restricted release to all functions having to know, under the responsibility of the Chief Executive Officers of the Environment & Energy Sector and of the Innovation and Systems Sector</p>
<p>Corruption risk in (potential) Partnerships <u>procedure</u></p>	<p>→ Defines the requirements applicable to the selection, assessment, authorization and monitoring of third parties with whom a Partnership, whether through a joint activity or a joint entity, is contemplated or ongoing.</p> <p>→ Functions concerned: (i) employees involved in the identification, selection and approval of prospective Partners, (ii) employees involved in the drafting, negotiation and approval of Partnership agreements, (iii) employees designated to represent the CNIM or any of its subsidiaries' interests as members of a decision-making body in a Partnership.</p>	
<p>Stock Market Ethics and Confidentiality <u>charter</u></p>	<p>→ Discloses the regulation applicable to people holding inside information.</p> <p>→ Defines the dealings in CNIM securities related rules applicable to corporate officers and their relatives and to all other employees who have a regular access to inside information relating to the Group, either directly or indirectly, and have the power to make decisions regarding the Group's evolution and strategy.</p>	<p>CNIM Inside Portal</p> <p>CNIM website</p>
<p>Whistleblowing <u>procedure</u></p>	<p>→ Defines the applicable policy to enable every employee to report any concern about potential and/or actual misconducts with reference to the CNIM Anti-corruption code of conduct and the CNIM Charter of Ethics and any other code, chart or procedure to which the latter refers.</p>	<p>CNIM Inside Portal</p>