
ETHICS

CHARTER



May 2018

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A word from the President

Our Ethics Charter reaffirms our fundamental values:
Passion, Global, Change, Trust, Social Responsibility and Energy.

These fundamental values are the foundations of the identity of our Company.
They guide our actions and the decisions we make.

This Charter reflects our Company culture; one based on commitment and responsibility.



Created in 1973, ESI is a company which has constantly grown and now employs more than 1,200 highly qualified staff worldwide, with diverse profiles, and working in different business lines. In a context which is becoming increasingly global and complicated, we felt it had become essential for us to establish an Ethics Charter that provides a real reference structure, and shares principles and practices.

Guiding each person to conduct one's mission in the same spirit, this Ethics Charter sets out the fundamental principles and the rules of conduct to be adopted to ensure compliance with the law and delivery on our commitments.

This Charter also sets out the kind of relationships that we wish to maintain within our company to

ensure a strong internal teamwork, and constructive collaboration and cooperation with all our stakeholders (clients, suppliers, shareholders, partners...).

We are all ambassadors of our Company. That is why I am counting on each and every one of you to both comply with, and to live by, this Ethics Charter. When we all do that we will ensure the longevity of our Company's values and our long-term growth with integrity.

Alain de Rouvray
Chairman & Chief Executive Officer

Christopher St. John
COO for Field and Support Operations

Vincent Chaillou
COO and President Edition Operations

Mike Salari
Executive Vice President Engineering Services

Christian Matzen
Executive Vice President Sales and Operational Marketing

Angelita Reyes
Human Resources Group Director

Corinne Rumefort-Régnier
Corporate Governance Director

Dominique Lefebvre
Product Operations Director

NB: In this document, "Company" includes ESI Group, the parent company, and all its subsidiaries.

Our Values

Our Values inspire our daily relations with our colleagues and fortify ESI's commitment to being a united Company.

GLOBAL – We are rich in diversity

The power of our highly innovative solutions enables us to be successful on a global scale. Being a global company we are proud to have a multicultural and diverse workforce.

We value differences and encourage our people to share their ideas across borders for creating an efficient and cutting edge workplace, allowing us to better serve our global customers.

Founded in France over 40 years ago, ESI is now present in more than 40 countries. We seek to extend our know-how and expertise by finding the best talents across the globe.

CHANGE – We are committed to improving ourselves every day

To us, change means constantly improving and innovating as new technologies and ideas come about. We welcome new challenges with enthusiasm and see them as opportunities for growth and improvement.

Innovation knows no routine! New joiners and our experts appreciate global creativity and are always taking part in change.

PASSION – We have a passion for innovation and excellence

The heart of our organization is our capacity for innovation, supported by our drive to achieve excellence. Our passion for Virtual Prototyping is the key to our motivation and success. We strive to build a supportive environment that fosters innovation and creativity, allowing us to better serve the needs of our customers. Passion is the reason ESI delivers the highest quality every day.

Ultimately, we measure the success of our innovations through our customer's success.



TRUST – We believe in one other

We spend time developing and nurturing trusting relationships to ensure our organization is successful and harmonious. Mutual respect, team spirit and healthy relationships are key to our work ethics.

We pay close attention to all beliefs and strive to demonstrate professionalism, loyalty and integrity in all of our interactions.

ENERGY – We meet every challenge with energy and determination

Energy is the source of our determination. We work together in a united spirit, actively collaborating to solve tough challenges and to develop innovative solutions.

Our energy drives our enthusiasm and motivation, qualities that characterize each and every colleague here at ESI. It is in this spirit that we approach our task of meeting our customers' goals.

SOCIAL RESPONSIBILITY – We respect people and contribute to inclusive growth and sustainable development

With the support of ESI's Virtual Prototyping solutions, our customers aim to develop better products, reach the highest standards of environmental protection, while significantly limiting waste and gas emissions.

ESI's teams participate in social value-added applications in domains such as safety, health and contributing to a greener environment.

Within our walls, we work every day to create a respectful and ethical workplace to contribute to the well-being of all. We create a stimulating and open work culture that promotes people for their knowledge, skills and experience as essential team members.

To watch our Values video, [click here](#)

Definition:

In this document, "Company" includes ESI Group, the parent company, and all its subsidiaries.

Objectives of this Charter

The Company's growth and success are based on strong values embodied by every employee.

Our key values - **passion, global, change, trust, social responsibility** and **energy** - give us cohesion, create the foundations essential to any relationships and ensure our growth and sustainability.

In this Ethics Charter, we formally set out the main rules of conduct which ensure respect for moral principles that are in line with our values. These rules, which are non-exhaustive, have to be followed by each and every employee when conducting their professional activities, irrespective of their role.

Against a backdrop of external growth which has seen new companies being integrated into our Company, **this Ethics Charter constitutes a common frame of reference** to be adopted by the new entities. This document is intended for each ESI employee and **to guide and inspire us all** in the choices we make in the course of our work, in order to keep our values and commitments alive on a daily basis; no matter the location or the circumstances.

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Compliance with the law and regulations

The first requirement in terms of ethics is to comply with laws, regulations and other obligations in force in each country where we operate. Furthermore, if the regulations of a country are stricter than the ethical rules outlined in this charter, the local regulation has to prevail; and if this Ethics Charter is partly stricter than local regulations, the Ethics Charter has to prevail.

In addition to complying with laws and regulations, each and every ESI employee has to show integrity and to honor the commitments undertaken in their dealings with other

employees, clients, suppliers, and other partners of our Company. Everyone also has to show equitability in the treatment of employees, partners and suppliers. All decisions have to be made based on objective and transparent criteria.

Any illegal and/or morally unacceptable action or practice is strictly prohibited. If the applicable regulations or the principles set out in this charter are not adhered to, the Company reserves the right to resort to legal and/or disciplinary actions in accordance with applicable laws and policies.

Implementation

This charter applies to all ESI employees, in all the Group's subsidiaries. Every employee and manager of the Company has the duty to read, understand and comply with this Ethics Charter and, if needed, refer to its rules and principles in the course of their work.

Compliance with the ethical principles contained in this charter contributes to the Company's reputation and performance, and helps to protect us from risks which could damage our operations, our future, or our reputation.

The implementation of the rules defined in this charter is based on principles combining flexibility and consistency. Each entity of the Company is responsible for implementing these rules in line with local constraints consequent to the applicable laws and regulations or the status of its employees.

For a more precise description of some of the principles outlined in this charter, employees have to refer to the policies, regulations or other guidelines produced by the Company or its entities on different matters.

In the event of uncertainty or doubt about the application of certain rules to particular situations, it is incumbent upon employees to refer to their direct manager or to their local HR director.

Failure to comply with the rules of the ethics charter will be considered as a shortcoming liable to be punished in line with the local laws and regulations of each country. Finally, no Company entity may take disciplinary measures against an employee who, in good faith, has reported a breach of the rules of this charter.

Advice for effective implementation:

- We all need to understand the Company's ethics charter and its values, and make them our own;
- We should lead by example, by adhering to the spirit and letter of the charter and by always acting ethically, even when other alternatives seem easier or more opportune;
- In the course of performing our duties, we should not put our own interests before those of the Company;
- We all need to perform our tasks and our professional activities in accordance with the law and with integrity;
- Everyone can ask for assistance, advice, or explanations on ethical matters when necessary;
- We all are responsible to create a working environment which promotes frank, open and constructive communication on all professional matters.

I – ESI, A RESPONSIBLE EMPLOYER

Our employees are the Company's main asset. Training, promoting and developing skills and integrating new talents are therefore key enablers for us.

Equal opportunities

The diversity of employees and cultures represented within the Company is a tremendous asset.

In its recruitment actions and career management, the Company undertakes not to make any discrimination, in particular on the basis of age, gender, skin colour, nationality, religion, health or disability, sexual orientation, political or philosophical opinions or trade union allegiances.

As part of its employer commitments, the Company is determined to offer its employees equal opportunity in terms of recognition, progression and career path, irrespective of their origin or beliefs and does not tolerate any discrimination or harassment of any kind.

Working conditions

The Company strives to take into account a harmonious work-life balance while considering the different local ways of life.

Moreover any forced or obligatory work not declared in accordance with local regulations, is strictly prohibited by the Company.

The Company will not tolerate child labor under any circumstances anywhere in the Group. It is

therefore of fundamental importance that the minimum age limit applicable in all countries in which we operate is adhered to. In any case, this minimum age is not allowed to be below the age set out by Conventions 138 and 182 of the International Labor Organization, i.e. 15 years, which rises to 18 years for dangerous or particularly difficult work.

Health and safety in the workplace

The Company has the duty to provide and maintain health and safety standards in the workplace of its employees in accordance with the applicable rules. In return, all employees have to do their best in preserving the quality of their working environment.

If an employee is aware of a situation which poses a risk to their own health or safety, or that of other employees, the employee must report it to the local Health and Safety Officer, or to the Human Resources Manager or to the Direct Manager. In case of emergency situation, the employee has the duty to report it immediately to anybody who can provide help quickly.

Who should I contact if I have a question?

For assistance or advice in regard to these topics, please contact:

- your **line manager**, or
 - a **Health and Safety Officer** (if existent), or
 - your **Human Resources Manager**,
- they will help and support you.

Training and developing potential

The Company attaches great importance to training. Training is a key factor in developing skills and furthering the career of each employee. That is why the Company strives to offer its employees an ever greater range of training options.

Individual performance appraisals take place every year. During these appraisals the opportunity is given to discuss between employees and managers, on the employee's contribution and performance. Moreover these meetings are an opportunity to set out the competencies required for the current position and future career progression, and discuss the needs and aspirations of employees.

Additionally to these annual guided and formalized conversations, the Company highly encourages all employees and managers to use during the year the given occasions to ask and to offer feedback for improving performance, and to use daily job tasks as opportunities of continuous learning.

Freedom of expression and social dialogue

Wherever the Company operates, ESI respects the principles of freedom of association and social dialogue, in both individual and collective form. The Company also respects the role and the responsibilities of the unions and agrees to communicate and negotiate openly with them on matters of collective interest in accordance with local provisions.

Discrimination and harassment

The Company's employees are required to comply with all laws and regulations prohibiting discrimination on the basis of age, race, gender, ethnic origin, nationality, religion, health, disability, marital status, sexual orientation, political or philosophical opinions, trade union affiliation, or other considerations protected by locally applicable legislation.

Furthermore, the Company does not tolerate any form of sexual, moral or physical harassment, coercion or persecution. If an employee witnesses or is the victim of any form of abuse whatsoever of this kind, the Company, notably the Human Resources department or any other relevant person, must be informed. The Company will ensure that no adverse action will be undertaken against employees making such a report in good faith.

Who should I contact if I have a question?

For assistance or advice in regard to these topics, please contact:

- your **line manager**, or
- your **Human Resources Manager**, or
- the **Work Council** or **staff representative (if applicable)**,

they will help and support you.

II – PROFESSIONAL CONDUCT

To ensure the Company's long-term success, each and every one of us is personally responsible for acting professionally and ethically.

Use of ESI Group assets

- **Principle**

Using the Company's assets for illegal or unlawful purposes is strictly prohibited.

All ESI employees agree to preserve the Company's tangible and intangible assets. Any misappropriation, improper use, or waste of the Company's resources has a negative impact on its performance:

- tangible assets mainly include working tools, systems and equipment, documents and various facilities;
- Intangible assets are the Company's "non-physical" assets: information, knowledge, intellectual property rights, etc.

- **Intellectual property**

The Company's intellectual property rights are one of its most valuable assets. All employees have a duty to safeguard these assets. The Company respects the intellectual property of third parties, particularly copyright on the software used for its own purposes or marketed by the Group in the countries in which it operates.

The Company does not make and does not authorize its clients or employees to use

Employees are not allowed to use the Company's equipment or facilities for personal purposes. However, limited and isolated use may be tolerated provided that it does not disrupt the Company's operations and is not excessive or in breach of the Company's safety rules.

Any use of products, services and solutions for purposes other than those for which they are intended, which may lead to a breach of applicable local regulations, directives or international treaties is formally prohibited by the Company, and anyone involved in such improper use may be held liable.

Generally speaking, purchases on behalf of the Company should not be made without a purchase order signed by the authorized person.

unauthorized software or to copy software beyond what is allowed by law. The Company ensures that the rights of intellectual property owners are respected and ensures that all internal users of software are informed of the rules governing the use of the software installed on the Company's hardware. Consequently employees do not have to check the origin of software made available to them by the Company. In case of doubt, employees must ask the IT Department for guidance.

Who should I contact if I have a question?

For assistance or advice in regard to these topics, please contact:

- your **line manager**, or
- the **IT Systems Department**, or
- the **Legal Department**,

they will help and support you.

Data confidentiality

- **Confidentiality of employee data**

The Company and each of its employees are required to comply with laws and regulations on confidentiality and personal data protection concerning persons, employees or third parties. Only properly authorized persons may access employee personal data.

Therefore, each employee must keep their own data confidential, and employees are prohibited from searching for the personal data of other employees, unless such searches have been authorized as part of their duties. With the exception of authorized persons, employees may only access their own information.

- **Confidentiality of the Group's non-public data and documents**

The Company's employees are not allowed to use or reveal confidential ESI data, or data from partners or clients which are communicated to the Company under non-disclosure or secrecy obligations, to any other person, throughout their employment at the Company or after they have left the Company. This provision applies irrespective of the origin of such information or the means by which it was obtained. Any breach of this rule may result in legal action being taken

pursuant to the applicable employment law, civil law or criminal law provisions.

Confidential information refers to information regarding the existence, terms and conditions of business or strategic projects and agreements, supplier or client lists, the Company's financial data, human resources and personal data and any other sensitive data, such as data relating to the revenue of production units, intellectual property rights not intended for publication, technologies, software or hardware used in the normal course of business.

Employees who are not sure whether they may properly disclose or act on information in their possession must seek guidance from their manager.

People whose contract of employment is coming to an end or those who no longer have an employment contract with the Company have a responsibility of confidentiality. Case law imposes a duty of loyalty which remains after termination of the employment contract, without prejudice to obligations imposed by the employment contract itself which may impose to keep the information secret as long as it is not freely available or as long as it does not fall in the public domain by other means.

Who should I contact if I have a question?

For assistance or advice in regard to these topics, please contact:

- your **line manager**, or
- the **Human Resources Department**, or
- the **Legal Department**,

they will help and support you.

Insider dealing

In the normal course of business, some employees may have access to information that can affect the value of the shares of the Company, if such information were to become public. Since the Company is a listed company it is subject to the securities laws and regulations of several jurisdictions which regulates disclosure of information to the public. As a result, all employees have to formally refrain from using inside information to decide to sell or buy Company's shares, or shares of other companies which could be affected by this information, directly or indirectly, on its behalf or on behalf of another.

Information is understood to be "inside" when it is not known to the public and is significant enough for its use or disclosure to have an impact on the Company's shares price or the share price of other listed companies.

This inside information may include as yet unpublished financial results, acquisitions or sales planned by the Company, the conclusion or termination of major contracts, surveys, research and development conducted by the Company, etc.

The Company endeavors to ensure the confidentiality of this inside information and to limit access to such information to a small number of people within the Company. All employees who have access to this information may not, under any circumstances, reveal it to family members or anyone else, or use it for personal ends.

The penalties for breach of these rules are severe and can include fines and prison sentences.

→ For further information on insider dealing, please refer to the ["Code of conduct with respect to trading and market activities"](#) (G.HC.14.09.A)

Who should I contact if I have a question?

For assistance or advice in regard to these topics, please contact:

- your **line manager**, or
- the **Corporate Communication Department**, or
- the **Legal Department**,

they will help and support you.

Relations with the media and the financial community

The Company communicates actively to strengthen its image among its clients, opinion leaders, analysts, and investors. As the Company is publicly quoted on the stock exchange, any communication with the media, analysts, or investors may affect its image and/or its reputation. Such communications must therefore be carefully examined and monitored. The *'Marketing Communication'* and *'Corporate and financial communication'* departments are responsible for media relations.

Any statements or answers to questions from the media have to be channeled through these

departments or coordinated by them. This also applies to the provision of images: simulation images, employee pictures, offices, etc.

The persons responsible for financial communication are responsible for all financial communications intended for analysts and investors. Any request from an analyst or an investor for information about the Company have to be forwarded to this department, which will deal with it.

Finally, employees other than the representatives appointed by General Management are not authorized to make statements to the media about the Company, its activities or employees,

even when such statements are presented as reflecting the personal opinions of the author.

Who should I contact if I have a question?

For assistance or advice in regard to these topics, please contact:

- your **line manager**, or
 - the **Marketing Communication Department**, or
 - the **Corporate Communication Department**,
- they will help and support you.

The laws governing our activities enable the Company to develop and foster our long-term growth. That is why we must comply with them.

Conflict of interest

Conflicts of interest distort judgement. A conflict of interests exists when the personal interests of an employee are at odds with the Company's interests within the context of a professional commitment.

Conflicts of interest arise when an employee would have private interests in the relationship with a competitor, client, or supplier of the Company during the negotiation or execution of a contract or the performance of a mission for a Company entity. It should be noted that a private interest consists in having a direct or indirect benefit. Simply having a relative working for a client or supplier or competitor could not constitute in itself a private interest. It is also considered as a conflict of interest when advances, loans, guarantees or services are directly or indirectly received with a view to influencing the Company's decision, or when an employee works simultaneously for a competitor, client, or supplier of the Company, or holds a substantial investment in any of the latter.

Each employee must prevent conflicts of interest by avoiding any direct or indirect financial relationship with a competitor, client or supplier of the Group outside their professional activities within the Group. As conflicts of interest are not always correctly defined, each employee is responsible for consulting their manager or their local Human Resource Manager if they have doubts about a particular situation.

The Company expects its employees to behave loyally and to show fairness and impartiality during business negotiations. Employees have to also ensure that the Company's partners have ethical concerns which are shared by the Group.

During the course of their work within ESI, employees must refrain from integrating a job

position for a supplier, customer or competitor and should not be involved, without the prior approval, in any outside work that may adversely affect their performance or judgement.

Relations with our business partners

- **Relations with clients**

The Company strives to establish transparent and loyal business dealings and to deal honestly and fairly with all clients, no matter the size of their company. The Company is committed to providing quality products and services to its clients which meet their needs.

The Company is committed to providing accurate information on its products and services in its advertisements, public statements and offers to clients. All employees who negotiate contracts have to ensure that all statements, communications and presentations to clients are accurate and reliable.

Confidential, sensitive or private information about clients have not, under any circumstances, to be disclosed to other parties by any employee, unless said disclosure is required or authorized as part of a project or contract or for legal means

- **Relations with suppliers and subcontractors**

Purchasing decisions are made based on an objective assessment of the reliability and integrity of the supplier or subcontractor, as well as the overall appeal of their offer in relation to short- and long-term aims and considerations. In order to protect the Company's interests, goods and services are purchased based on price, quality, performance, delivery, and suitability criteria. The Company takes care not to create a situation of dependence with suppliers and subcontractors.

The Company requires its suppliers and subcontractors to strictly comply with all legal provisions relating to their activities and their professional environment.

- **Corruption, facilitation payments and influence-peddling**

Corruption is any behavior whereby a person (whether a public official or a private individual) proposes, requests or accepts, directly or through an intermediary, any donation, offer or promise, gift or benefit in return for performing, delaying or failing to perform an act which directly or indirectly falls within his/her duties in order to obtain or maintain a commercial or financial advantage or to influence a decision.

Facilitation payments are unofficial payments (as opposed to legitimate and official fees and taxes) that are paid to facilitate or expedite any administrative formalities such as applications for permits, visas or customs clearances.

Influence-peddling refers to a person monetizing his/her position or influence, whether real or supposed, in order to influence a decision which is to be made by a third party. It involves three participants: the beneficiary (the one who provides benefits or gifts), the intermediary (the one who uses the influence they enjoy by virtue of his/her position) and the target person who has the decision-making power (a government authority or agency, a judge or prosecutor, an expert etc.).

The Company strictly prohibits any form of corruption in its relations with its business and institutional partners and with the administration. No financial or in-kind gratuities may be given with a view to obtaining an advantage, nor may such gratification be received to benefit a company or person.

Therefore, it is prohibited to offer or accept gifts valued in excess of amounts imposed by law or internal policies. It is further prohibited to accept and/or pay bribes or other gratifications, or to

grant undue benefits, whether directly or via an intermediary, to a public agent and/or a private person in any country with a view to obtaining favorable treatment or influencing the outcome of a negotiation which involves the Company. Such practices are illegal in most countries. If an employee makes facilitation payments or influence-peddling in the course of their professional activities, they are likely to be subject to criminal penalties and their contract of employment will be terminated.

In case of doubt on the acceptance or the offer of a gift, the employee should consult their manager and clarify whether such action is appropriate.

Pursuant to applicable international rules on corruption, the Company is prohibited from directly or indirectly receiving or giving, promising or soliciting facilitation payments and influence-peddling or other undue benefits with a view to granting, obtaining or maintaining a contract or any other advantage, whether or not the local laws permit it.

A written contract has to be entered into in accordance with internal procedures and policies, and signed by the authorized persons if a fee or other remuneration is to be paid to sales representatives or business finders. The compensation must not exceed a reasonable amount for the commercial services actually rendered, and checks have to be made to ensure the services are useful and have indeed been provided.

- **Gifts and hospitality**

Gifts are benefits of any kind given by someone as a token of gratitude or friendship, without any expectation of receiving something in return.

Offering or being offered meals, accommodation and entertainment (shows, concerts, sporting events, etc.) is considered to be a hospitality.

The Company aims to ensure that any business decisions taken by its employees, customers or suppliers are made solely through the proper business channels – fundamentally based on competitiveness, performance and the quality of the products and technologies it offers — and are not driven by any form of personal improper advantage or conflict of interest.

In some cultures, good business relations may sometimes involve the exchange of symbolic gifts and hospitality. Employees must not offer, accept or authorize a family member or relative to accept gifts, money, loans, invitations or any other form of special treatment from anyone involved in business dealings with the Group, if the ultimate goal is to influence business decisions.

Employees may accept or offer, on behalf of the Company, an occasional business meal invitation or an occasional non-pecuniary symbolic gift of low value in which no compensation is expected. Any employee required to offer or accept a gift or invitation of value as a result of protocol, courtesy or other reasons must first inform his hierarchy within 48 hours. If the gift is considered inappropriate, the employee must give it back.

Fraud and money laundering

Fraud and money laundering are the processes disguise illegal origin of money and typically associated with criminality activity.

The Company respects laws on fraud and money laundering and conducts business only with reputable partners.

Each employee has to be vigilant regarding any payments made in order to detect any irregularities, notably with partners whose business conduct may raise suspicion.

The Company ensures that the accounting and tax declarations sent to the authorities are complete and reflect the reality of each subsidiary. The internal control mechanism must be particularly vigilant with regard to the accuracy and veracity of the accounts. It must be particularly vigilant about warnings (false invoicing, market price for equivalent services...).

Patronage, sponsoring

Through patronage or sponsorship, the Company wishes to provide financial or material support to a charitable organization or a social, cultural or sporting entity as a means of communicating and promoting its values.

They must be carried out without any seeking specific benefits from the beneficiary other than the promotion of the corporate image.

Compliance with antitrust laws

Competition is necessary for economic efficiency. It is one of the essential conditions of the open and fair economy in which the Company believes.

The Company prohibits any exchange of confidential information and any arrangement – formal or informal – or attempt to enter into arrangements with competitors which seek to fix prices or conditions of sale, to share a market or to boycott a particular market actor, for example in the course of meetings of professional organizations or associations.

Furthermore, the Company refrains from abusing a dominant position or a monopoly and from acquiring or maintaining a dominant power other than by recognized legitimate means such as patents, skills, superior know-how or a geographical situation.

Any breach of this rule is subject to heavy penalties, even criminal sentences for the Company and the employee in question. Employees who receive a communication or

notification from a local or supranational antitrust authority must immediately refer it to their line manager or to the Company's Legal Department or to the Ethics Committee.

Who should I contact if I have a question?

For assistance or advice in regard to these topics, please contact:

- your **line manager**, or
- the **Legal Department**, or
- the **Ethics Committee**,

they will help and support you.

Whistleblowing procedure

Any individual in the employ of ESI, or any customer, supplier, partner or other third party, who becomes aware of a possible violation of the Charter, or of a violation of the law by the Company or any of its employees, has an important duty to report it. While it is natural to have misgivings about raising such a concern, everybody is strongly encouraged to do so, as remaining silent could have serious negative consequences for the Company.

The use of the professional whistleblowing procedure described below is neither mandatory nor exclusive.

The procedure for reporting is as follows:

- The first contact is the local/regional HR correspondent or the line manager;
- In the case of a conflict of interest involving the HR correspondent or the line manager, please contact the division/Group RHD or the N+2 manager;

- or directly to the Ethics Committee: ethics@esi-group.com

Confidentiality and anonymity

All inquiries will be handled promptly and discreetly. If you report a possible breach of the Charter, you have the right to remain anonymous, and confidentiality and/or anonymity will be maintained through the whistleblowing procedure. However, it is usually easier to conduct a full and fair investigation of your concerns if you identify yourself and those involved.

You will not be penalized, dismissed, demoted or suspended and no retaliatory action will be taken against anyone for reporting or inquiring in good faith about potential breaches of the Charter or for seeking guidance on how to handle suspected breaches.

Training

Employees are required to acquaint themselves with this Charter and to participate in the training sessions that will be organized by the company to raise awareness about various ethics issues.

New employees are made aware of the Charter and its provisions immediately upon assuming their duties within the company.

Reporting practices that are in breach of the Charter and protection of whistle-blowers

Any employee who, in good faith and without being influenced by personal interest or advantage, that is to say, being sincerely persuaded that his/her statement is accurate, reports a violation or a risk of a violation of the Charter to his/her supervisors or the designated contact person, will be protected from all forms of reprisal. The identity of any such employee and the facts of the matter will be treated confidentially, in accordance with the relevant regulations.

Furthermore, while a bona fide error will not result in any disciplinary action, allegations that are deliberately vexatious or made with malicious intent will be penalized.

Whistle-blowing schemes and protection of personal information

Employees must be informed of the existence of the scheme.

In accordance with the rules applying to the protection of personal information in force in most of the countries in which the company operates and, in particular, within the European Union, any persons identified in connection with a whistle-blowing report, whether as the author or the subject of a such a report, may exercise their right to access the data relating to them.

Likewise, anyone may also request the correction or deletion of personal information if it is inaccurate, incomplete, ambiguous or out-of-date.

Penalties for violations of this Charter

Non-compliance with the rules triggers the personal liability of the employee and exposes him/her to penalties, in particular penal sanctions, according to the applicable legislation.

The company undertakes to:

- take all statements into account;
- diligently investigate whistle-blowing reports;
- assess the facts objectively and impartially;
- take appropriate corrective and disciplinary measures.

Implementation: accountability and oversight

It is incumbent upon each employee to implement the Charter as part of the responsibilities attached to his/her position.

The company carries out periodic checks to confirm that work practices comply with the Charter.

The company and/or group governance bodies provide regular updates on the monitoring of the Charter and on any follow-up arising from whistle-blowing reports.