

Ethical Code





Introduction

Summary of commitments

Social Aspects

- Human Rights

- Compliance to Local Laws

 - Compliance to Labour Standards

- Employee Rights

- Customer, Supplier, and Subcontractor Relationship

- Management

- Moral and Sexual Harassments

- Political Neutrality

- Mutual Cultural Respect

- Management Systems

Environmental Aspects

- Respect for the Environment

- Awareness

Economic Aspects

- Corruption

- Free Competition

- Conflicts of Interest

- Finance

- Confidentiality

Summary

Introduction

We make a promise to respect the terms and conditions of a contract and all its stakeholders. The concept of *commitment* shows that Serac chooses to be responsible, proactive, and present with the concerned stakeholders, may they be direct or indirect.

These commitments are multiple: they are firstly intended to our customer, towards whom Serac commits its deadlines, quality, and assistance. But not forgetting our partners, our suppliers, and civil society organisations and local authorities with whom we operate!

To extend our willingness to go further in terms of CSR, Serac pursues its vision of a company convinced by the durability of its relationships with all its stakeholders.

Serac has decided to create a Code of Ethics to highlight the existing group strategy in terms of social responsibility and sustainable development.

Serac believes it must make ethics a vital means of improvement for its global performance. Ethics are essential to operations, won contracts and markets. It is also the pedestal of all forms of well managed collaboration with our employees, our clients and our suppliers.

This Code of Ethics is aligned with the three pillars of sustainable development and commits Serac to the following axes:

- Social and Societal
- Environmental
- Economic

This Code of Ethics is intended to all of Serac's different stakeholders and will be supported by its team members.

What are Serac's expectations from its team members in terms of ethics?

Serac simply expects that its teams act in compliance to ethics and local laws, as well as the group's Code of Ethics at any given time or place.

Serac also expects its teams to be confident enough to speak out and act without fear. As a whole, Serac and its associates have the responsibility to notify all illegal and fraudulent conduct or that may be against ethics. By notifying and rising such issues, Serac will be able to maintain a healthy and ethical working environment without compromising its performance on all levels.

In any case an associate will be reprimanded if he or she notifies Serac a concern in good faith.

What to do in case of an issue?

In the case where a situation goes against the Code of Ethics, Serac encourages its employees to share this information to their usual hierarchy communication process. This can begin with a discussion with a direct superior (or with a person at the following hierarchy rank), a representative from Human Resources or the legal department.

Any associate can also take the initiative to contact the Ethics Committee through the following e-mail address: ethics@serac.fr

This committee is composed by management representatives, employee representatives, and the CSR representative.

What are Serac's commitments in terms of ethics?

Serac does not tolerate reprisal against its associates, clients, suppliers or individuals that will notify the company of any issue whether ethical or legal. Anyone who uses reprisal towards a person who speaks up violates Serac's ethical standards and will be internally submitted to possible sanctions defined in the Company Rules & Regulations, or, externally, to judicial proceedings.

Those who speak up effectively help maintain a healthy and pleasant work environment while keeping it efficient and protecting the group's reputation of excellence.

Serac is committed to consider each reported allegation in a serious manner, with the objective of resolving each one in a fair and impartial way.

From the overall tools that are available to each individual who wishes to communicate on an ethical concern, Serac will not receive any anonymous complaint. Indeed, employees, clients, suppliers or individuals (those who speak up) who would like to share their concern have sufficient and solid guaranties to not worry.

Serac will be strongly compelled to confidentiality in all types of situations.

Summary of Commitments

Generally, Serac concurs with:

- The principles in The Universal Declaration of Human Rights of 1948;
- The principles from the International Labour Organization;
- The guiding principles of the Organisation for Economic Co-operation and Development (OECD) intended to international companies;
- The principles of the United Nations Global Compact

Any legislative frame specific to countries in which the group operates.



Social Aspects

Human Rights

By adhering to the United Nations Global Compact, Serac is committed to respect and promote fundamental rights from the Universal Declaration of Human Rights, the dignity and value of a human being.

Serac is also committed to respect legislations which come from local Labour Codes where the group operates, as well as those from the International Labour Organization (freedom of association and the effective recognition of the right to collective bargaining, effective abolition of child labour, elimination of all forms of forced or compulsory labour).

Compliance to Local Laws

Whichever the country or economic zone where the group operates, Serac will always ensure its compliance to local rules and regulations.

On a wider scope, Serac commits to be aligned with the framework of international laws and legislations/regulations: international trade, anti-trust laws, data protection.

Compliance to Labour Standards

Serac complies with legislations and regulations related to child labour and other forced or compulsory labour.

In compliance with international standards, Serac commits to systematically compensate or remunerate its associates through the following means (non-exhaustive list):

- Salaries,
- Paid leave,
- Overtime.

See [The Universal Declaration of Human Rights](#)

See the [10 Principles of the United Nations Global Compact](#)

See the [ILO Declaration on Fundamental Principles and Rights at Work](#)

Serac is also committed that these compensations be at least equal if not above the minimum required by the law in the country in which Serac is established.

Serac prohibits all illicit conduct constituted of sexual or moral harassment, including in the absence of hierarchy or subordination.

Serac commits to guarantee its employees an adapted working environment in adequacy with its health and security awareness policy.

Moreover, Serac will thoroughly make sure that each associate be:

In legal age to work,
Legal in the scope of their work and projects (visas, work permits, etc.)

Employee Rights

Serac ensures its associates' rights. By adhering to the United Nations Global Compact, Serac commits to create an initiative to promote diversity, in conformance with the Millennium Development Goals.

Serac also commits to fight against all forms of discrimination, regardless its nature, whether linked to sex, ethnic origin, nationality, religion, health, handicap, marital status, sexual orientation, political opinion or philosophical opinion of its associates, whether during the hiring process or in working relationships.

Serac recognises the right and the importance of workers' union. In any case, Serac will not tolerate any form of intimidation or harassment towards its associates who wishes to approach or keep away from a legally recognised trade-union.

The respect of dignity and private life of each of its associates as well as their well-being constitutes an important concern to Serac. Consequently, any associate will never be forced to work over the number of hours initially planned in their work contract. In the event of overtime hours, these will be paid for and will not in any case be imposed.

Serac is also committed in terms of equal rights of disabled individuals. The 2010 ratification of the Code of Employment for Workers with Disabilities includes fair and equal treatment of those with disabilities, especially regarding: access to employment according to acquired or potential expertise, professional training and professional evolution in the company.

Customer, Supplier, and Subcontractor Relationship Management

Serac commits to work honestly and fairly with all its customers by supplying them with quality products and services which meet their requirements. Serac is also committed to be accurate on the information given on its products and services rendered.

Confidential, sensitive, or private information related to clients must not in any case be communicated to others by any employee of Serac Group.

The support given by agents, consultants or intermediaries for commercial purposes may be necessary in areas where Serac Group's implementation is poor due to technical competencies. The resort to these intermediaries is only justified in a contractual framework and only if the services are genuinely rendered. Their payment is according to these services and will be in line with their contract with Serac.

Serac associates do not accept to receive, directly or indirectly, any payment, gift, loan, entertainment, or any kind of benefit from anyone engaged in a commercial relationship with Serac Group. Only courteous and hospitality acts are accepted, work meals, or other forms of expressions related to the profession or to the country's culture, as well as gifts other than monetary if their value is low and if such practice is conform to customs. Hierarchy will have to be informed of all kinds of requests or offer of unusual benefits which concerns an associate.

Moral and Sexual Harassments

Serac respects French and European laws in effect regarding moral harassment. Any violation of this legislation will be sanctioned.

Moral harassment is defined by repeated acts with the objective to degrade working conditions likely to infringe a worker's rights at work and their dignity, to alter their physical health or to compromise their professional future. These acts cover numerous aspects but essentially: acts with the objective to morally harm or upset an associate, voluntarily push an individual to commit a mistake, all forms of humiliation or hierarchical intimidation, physical or social isolation... Serac encourages all its associates to speak up if need be.

Serac respects French and European laws in effect regarding sexual harassment.

Code Civil du Travail, [chapitre IV, article 169](#)

Code Civil du Travail, [article L122-46](#)

Any violation of this legislation will be sanctioned.

Sexual harassment consists of harassing others through forced acts in order to obtain sexual favours for the harasser or a third party. Serac encourages all its associates to speak up if need be.

Political Neutrality

Serac has never and will never contribute in any form to the financing of any political party or similar organisation.

Serac associates who have political activities will do it privately, outside workplace and working hours. They are prohibited, in this context, to communicate on their political memberships within the Serac Group.

Mutual Cultural Respect

Due to its international activities, Serac Group is regularly confronted to manage many nationalities, cultures and languages in its exchanges. Serac commits to respect a certain form of cultural neutrality towards all its clients, suppliers and employees in a mutual cultural respect context of customs.

Management Systems

Serac ensures to apply consistent attitudes with a policy of good company governance. Its board as well as the management commit to create and entertain management systems to prevent all forms of attitudes which may go against the Code of Conduct and to ensure that all of Serac Group's associates are aware of the rules in the Code of Conduct.

Serac has also set-up internal measures which allow verifying:

The working conditions of employees and all relevant stakeholders at its suppliers and sub-contractors, in accordance with the Universal Declaration of Human Rights

The compliance to effective laws and regulations in its subsidiaries.



Environmental Aspects

Respect for the Environment

Serac is aware of environmental impacts linked to its activities and therefore encourages all its stakeholders to prefer policies which respect the environment. In this context, Serac commits to respect the Principles established by the Rio Convention.

Serac's environmental objectives are numerous: local and international legislation conformity, continuous improvement of existing systems, communication on progress to organisations such as the United Nations, setting-up extra-financial indicators, environmental issues awareness towards associates, analysis of CO2 rejection and energy consumption...

To materialise these objectives, Serac commits to multiplying these initiatives: waste repurposing, energy saving programs, responsible resource management, less travelling...

Awareness

Serac is committed to pursue its efforts in Green IT, more importantly by the decrease of this ecological footprint linked to the use of Information Technology (IT).
Serac commits to decrease nuisances linked to the manufacturing (exhaustion of non-renewable resources), use (energy consumption) and end of life (pollution) of its IT equipment.

Serac also commits to take the initiative to analyse the energy efficiency of its machines: electrical consumption, water consumption, polluting products...

See the [Principles of the United Nations Declaration on the Environment and Economic Development, June 1992](#)



Economic Aspects

Corruption

Serac is convinced that trust is the base of a healthy economy and society – **corruption destroys that trust**. Through the risks and difference it causes, corruption slows economics growth and social progress: the sums which are embezzled are often at the cost of collective interest, increasing poverty, and environmental and health concerns. Corruption practices, pursuits and scandals which are triggered are serious concerns to the reputation of companies and those of implicated individuals.

Serac is hence committed to respect the Principles of the United Nations Convention against corruption.

Through this, Serac refuses to give, receive or supply, directly or indirectly, any form of benefit (whether it be monetary or in nature) to a State representative or on his/her behalf, to a political party or on their behalf, to an employee or a client's public or private agent or on their behalf, to a loan organization or a bank or on their behalf, in the sole objective to obtain or maintain a commercial transaction or even receive any ease or favour implying the transgression of a regulation.

Serac's associates will act according to the OECD Convention from 17 December 1997 on the fight against corruption.

On a general note, Serac encourages all its associates to contribute to these efforts of transparency in business while having constant vigilance, lucidity and ethics.

See the [United Nations Convention against corruption](#)

See the [Convention implementation](#)

Free Competition

Serac respects all its stakeholders in its professional environment, including its competitors: exchanges are essential and Serac acts with its competitors as how the group would like to be treated. The interest for Serac is to work in an industry where commercial practices benefit from a good reputation: the fact of sharing information could give the impression that agreements on prices are made, sharing land or all other forms of manipulation or distortion with competitors.

In such, Serac commits not to associate to agreements with competitors with the intention to fix prices, falsify a call for tender, share certain markets, limit production or boycott a client or a supplier.

Each associate is therefore prohibited from all interest from a supplier or client, except if it is done through the purchase of titles on public markets, in the context of a title portfolio management and in the compliance of rules prohibiting the use of privileged information.

Conflicts of Interest

In terms of conflicts of interest, Serac commits to prevent situations in which personal situations could be in conflict with the interests of Serac Group (the most simple suspicion of conflicts of interest could harm the Group's reputation as well as those of its associates).

This is why Serac commits in a proactive initiative which encourages its associates to report all potential conflict of interest, even if these could only give the impression to influence opinions or acts on other associates.

Finances

Operations and transactions which are performed by Serac Group are saved accurately in the accounts of each subsidiary, in compliance with the effective norms and regulations.

No parallel un-saved activity or other secret account will be tolerated within Serac Group.

Serac commits to communicate fully and accurately on such information to concerned parties when necessary.

Confidentiality

From the nature of activities of Serac Group, the term confidentiality is particularly sensitive and more importantly regarding: innovations, patents, commercial strategies, prices, or any other potentially sensitive activity. In the scope of his/her work, if an associate were in possession of sensitive information (personal information, protected expertise, confidential data...), the latter would ensure its compliance to confidentiality and will ensure its protection.

Each Serac Group associate therefore has the obligation not to divulge professional and confidential information to which he/she has access to, to external third parties (including members of his/her family) or to individuals within the Group who are not entitled to such knowledge.

Each associate is prohibited to directly or indirectly use, for personal reasons, privileged information that he/she could have in the context of his/her work. In the event of leaving, each associate will have to give back all the confidential information he/she had access to (including all electronic copies) to his/her hierarchy.



Summary

Thorough compliance to laws, regulations and internal norms. especially in terms of health and security protection and the preservation of the environment;

Respect of associates, by complying to the Universal Declaration of Human Rights and to the International Labour Organization fundamental conventions

Respect, honesty and fairness towards clients, partners and competitors;

Sincerity et trustworthiness of internal management, accounts, and financial information;

Respect of free competition rules and rejection of corruption in all forms, most importantly those prohibited by the UN and the OECD;

Loyalty towards the company, by avoiding conflicts of interest, breach of confidentiality or personal appropriation of company assets;

Solidarity-minded between subsidiaries;

Constant efforts for the sake of quality and sustainable development;

Political neutrality in the company, by avoiding financial contributions to political parties;

Mutual respect of local cultural differences.

