



DEFI GROUP

CSR Policy

Ethics Charter and Code of Conduct

Driven by its founding values - **expertise, reactivity, sustainability** – **DEFI GROUP** has based its development on the fundamental principles of transparency, honesty and respect. Universally adopted throughout the company, this approach has made it possible to combine economic profitability and legal exemplarity, long-term business relationships and employee well-being, compliance and sustainable development.

Having become a key stakeholder in its industry, today, **DEFI GROUP** bears particular responsibility in terms of ethics and integrity, promoting exemplary behaviour among its employees, customers and partners alike. That is the purpose of this charter, which serves to confirm and enshrine our vision of an ethical approach with a code of conduct shared by everyone. Applied to all our everyday business and managerial activities, it should be seen as a mobilising force, a pathway to progress and excellence throughout our organisation.

Alongside the collective and individual commitments contained within this charter, it should be read, respected and applied by everyone at all levels of responsibility within the company. Made up of nine key areas, this unifying document is not intended to replace any laws or regulations, but rather to encourage compliance in terms of continuous improvement, our mutual success and sustainability.

1. Human Rights and Diversity



DEFI GROUP undertakes to respect the fundamental rights set out in the Universal Declaration of Human Rights in all its relationships with employees, clients, suppliers and the society in which it operates.

As such, **DEFI GROUP** bases its Human Rights Policy on the values of fairness, equal rights for men and women, respect for the rights of others, their uniqueness and their cultures.

Relations with company employees are guided by the principles of trust and mutual respect, where

each decision is made on the basis of treating everyone with care and dignity. **DEFI GROUP** strives to prevent any form of pressure, pursuit or persecution, whether moral or sexual in nature; any such actions will not be tolerated and will be subject to sanctions.

Finally **DEFI GROUP** is committed to respecting the fundamental rights of indigenous populations and local communities, as defined in the 2007 United Nations Declaration on the rights of indigenous people.

2. Human Resources and Employment Rights Policy



DEFI GROUP undertakes to respect the Declaration on Fundamental Principles and Rights at Work from the International Labour Organization (ILO).

As such, **DEFI GROUP** undertakes, in particular, to respect freedom of association and to recognise the right to collective bargaining; never to use forced or compulsory labour nor to be an accomplice in it; to firmly oppose child labour; to contribute to the elimination of all discrimination

in terms of employment and occupation, whether related to race, age, sex, ethnic origin, religion or any disabilities.

DEFI GROUP undertakes to provide all its employees with a safe and healthy working environment and to respect everyone's working hours and personal lives. The Group is committed to promoting employee development by practising open dialogue, valuing team spirit and implementing a corporate policy to satisfy this objective.

DEFI GROUP's human resources policy is based on the principles of dignity, mutual respect and reciprocal trust. Beyond simply respecting applicable laws and regulations in matters of employment law and labour relations in each of the countries in which **DEFI GROUP** operates, the company has set out the following objectives:

- to promote, in all its forms, dignity in the workplace;
- to respect the personal lives of its employees (particularly in terms of the laws governing IT files);
- to encourage the sustainable development of the jobs it offers its employees;
- to support their development with an appropriate workplace training policy;
- to encourage the employment and integration of workers with disabilities;
- to develop responsible labour relations with employees and their representatives.

In this regard, **DEFI GROUP** undertakes to respect the following principles:

- **CHILD LABOR** : **DEFI GROUP** does not use child labor under the age of 18. Educational programs (such as internships and work-study training) are not covered by this ban.
- **FORCED LABOR** : **DEFI GROUP** does not use forced or compulsory labor, that is to say any work or service demanded of a person under the threat of any penalty or for which the person has not given his consent.
- **WORKING TIME** : **DEFI GROUP** ensures that national laws regarding working hours are applied, including overtime. Employees benefit from at least one day and a half of rest per week, except in exceptional circumstances and for a limited period.
- **REMUNERATION** : **DEFI GROUP** ensures that no remuneration is lower than the legal minimum set in the collective agreement and that over time is systematically recovered or remunerated at a rate higher than the normal hourly rate.
- **EQUAL OPPORTUNITIES AND NON-DISCRIMINATION** : **DEFI GROUP** ensures that its decisions regarding employment (recruitment, promotions, transfers, dismissals, remuneration and training) are taken according to skills, merit, as well as contribution to a team or economic entity. **DEFI GROUP** therefore prohibits any decisions being taken that are likely to lead to discrimination against an employee, particularly on the grounds of their sex, sexual orientation, background, beliefs or opinions.

- **GENDER EQUALITY** : **DEFI GROUP** uses the official equality index as a practical tool to advance equality between women and men within the company. This annual publication allows us to reflect on the main causes of inequalities between women and men : the impact of maternity, the valorization of technical functions compared to relational functions, the breakdown of part-time work and disparities in careers.



- **HARASSMENT** : **DEFI GROUP** does not accept any manifestation of violence at work and any form of harassment, sexual or moral, which may result in action, pressure or conduct against an individual.

3. Health and Safety Policy

For ethical reasons, **DEFI GROUP** constantly places health, the safety of people and goods, security and accident prevention as primary objectives. **DEFI GROUP** considers the safety of its employees, subcontractors and external stakeholders a major component of its performance.



In order to protect their health and safety, **DEFI GROUP** undertakes:

- to carry out risk assessments;
- to analyse any accidents, incidents or dangerous situations;
- to implement the necessary preventive and/or corrective actions in order to minimise accidents in the workplace and occupational illnesses as much as possible;
- to train, qualify and empower its employees and stakeholders;
- to provide appropriate personal protective equipment and strictly monitor its usage;
- to measure and continually reduce noise and vibrations;
- to harmonise best practice between different **DEFI GROUP** sites and encourage feedback from across the organisation;
- to stay regularly informed of regulations and other applicable external health and safety requirements; to respect them and verify their application;
- to set specific annual targets for each of its facilities, as defined during management reviews;
- to communicate and explain this policy, annual targets and results achieved to all staff.

Every **DEFI GROUP** employee, key stakeholders of this policy, must ensure on a daily basis that their actions do not entail any risks, to themselves or others, and must undertake to report to their managers any behaviour, equipment or situation likely to compromise the safety of their working environment, as well as any accidents, however minor. This rule will always prevail over any other technical or economic consideration.

4. Environment and Energy

❖ Environmental policy

DEFI GROUP fully respects local legal requirements in respect of land, forest, and water rights, and must not participate in illegal forced eviction.

In an effort to ensure continuous improvement, **DEFI GROUP** adheres to a responsible and proactive policy in terms of the environmental challenges we currently face. The Group undertakes to comply with the legislation in force and is working to achieve the highest standards in terms of environmental protection and energy management.

Beyond the legal requirements, **DEFI GROUP** leads and supports initiatives aimed at promoting greater environmental responsibility, such as recycling paper and IT equipment, campaigns to raise awareness on responsible travel, the fight against global warming, as well as restoring biodiversity.

DEFI GROUP undertakes to regularly monitor its installations and take the necessary measures to improve the quality of air, water and soil.

The **DEFI GROUP**'s 7 key points for protecting the environment are :

1. selectively sorting waste;
2. not wasting water;
3. turning off any equipment not in use (computers, lights, etc.);
4. respecting the rules for handling and storing chemicals;
5. regularly verifying the effectiveness of retention;
6. not allowing chemicals to wash away in rainwater or domestic water supplies;
7. reporting any incidents, anomalies or changes that could have an impact on the environment to the authorities and management.

DEFI GROUP expects its partners to show the same level of respect and to contribute to environmental protection by helping us reduce consumption of raw materials and energy, optimise natural resources and reduce waste during product industrialisation, manufacturing, distribution and recycling processes.



❖ Environmental performance

Faced with the urgency of the climate challenge, **DEFI GROUP** is leading an ambitious decarbonisation policy in order to contribute to the transition to a carbon-neutral industry by 2050. **DEFI GROUP** thus wishes to be a player in the energy transition and is committed to limiting the environmental impact of its activities, by recovering its waste, reducing its energy consumption, preserving resources and seeking to reduce its carbon footprint on all scopes (1, 2 and 3).

This commitment to increasing its energy performance translates into :

- the implementation of energy audits and associated action plans ;
- measurement of the carbon footprint every year ;
- diligent monitoring of consumption (electricity, gas, water) ;
- progressive modernization of the working tool ;
- optimization of existing infrastructures.



In addition, the **DEFI GROUP** production sites regularly carry out measurement campaigns to:

- check air quality and the concentrations of atmospheric emissions ;
- assess noise in workshops ;
- ensure the quality and compliance of water emissions.

5. Integrity of Business Relations

DEFI GROUP bases its business relations with clients on the principles of honesty, transparency, professionalism and fairness. The Group commits to listening to the needs of its clients attentively in order to present precise, clear, tailored and personalised solutions. The Group strives to provide quality services that meet their requirements, to respect commitments made in terms of timings, costs and reliability as well as intellectual property.

Confidential, sensitive or private information relating to clients held by **DEFI GROUP** employees must never be communicated to others, except when required or authorised by said clients within the framework of a specific project or contract.



DEFI GROUP has always sought to fight corruption and not to offer or receive, directly or indirectly, any perks (financial or otherwise) for the sole purpose of obtaining or maintaining business transactions, or receiving any help or favours involving a transgression of a regulation.

DEFI GROUP does not tolerate any breaches in this area and therefore invites all its stakeholders to adopt the same approach and expects its employees, service providers, subcontractors and suppliers to comply with the commitments of its Ethics Charter.

A “conflict of interest” occurs when an employee's private interests override or interfere with his or her professional interests, or when an employee or close relative could personally benefit from a transaction involving a customer, supplier, a service provider and **DEFI GROUP**. **DEFI GROUP**'s customers, suppliers and

service providers must under no circumstances seek to influence a decision in circumstances likely to create a real or perceived conflict of interest.

To contribute to international peace and security **DEFI GROUP** controls its export of products in compliance with Foreign Exchange and Foreign Trade Act, international laws and applicable foreign laws and regulations.

DEFI GROUP complies with applicable laws, internal accounting, reporting guidelines, external financial and non-financial reporting standards and ensures that the information it supplies to its stakeholders provides a true and fair view of its financial situation.

6. Respect for Competition

DEFI GROUP is subject to competition law and recognises its key virtues, namely market access and market transparency. In this sense, the Group undertakes to prohibit anti-competition practices in all its activities.

DEFI GROUP prohibits participation in any illicit arrangements with competitors where the objective is to distort a call for tender or consultation process, fix prices, share a market or even exclude a given client or provider.

DEFI GROUP further undertakes not to exchange any sensitive information with competitors and does not allow any acts of unfair competition likely to cause harm to a competitor.

7. Supplier Requirements

DEFI GROUP undertakes to communicate this charter to its suppliers and subcontractors, along with any requests to implement any requirements in terms of ethics (human rights and diversity, employment law, integrity of business relations, respect for competition and the environment) within their own companies.

8. Data Protection

The various entities that make up **DEFI GROUP** and their employees must be particularly vigilant and comply with all laws and regulations governing the protection, use and confidentiality of personal data.

In this context, information relating to the private lives of employees, as well as data relating to performance appraisals, promotions and remuneration, must be kept confidential. Access to this type of information is restricted to duly authorised individuals.

As a result, **DEFI GROUP** employees :

- must not collect information on the private lives of other employees, except where necessary for human resources management or other legitimate professional reasons, and only within the limits authorised by the laws in force;
- must guarantee the right of access, verification and rectification for personal information held on employees, in accordance with the laws and regulations in force;



- must not share personal information with any third parties, except in exceptional circumstances as authorised by the laws and regulations in force.

Files, goods, technical data and various other confidential information relating to the company represent significant assets that may prove critical in order to protect the results and competitive advantage of **DEFI GROUP**. All these elements shall remain the property of the company and must be returned by employees whenever their employment contracts expire.

Of particular importance is any information pertaining to the existence or terms and conditions of projects and sales contracts belonging to **DEFI GROUP** and any other sensitive data, such as information relating to the turnover of production units, remuneration, technologies, software or hardware used as part of normal business operations.

DEFI GROUP employees are prohibited from disclosing these elements to third parties and, in particular, to the press or on social media without prior authorisation, or to any other **DEFI GROUP** employees not authorised to hold such information. To this end, **DEFI GROUP** has an internal procedure for disclosing information to all our stakeholders, regarding the appropriate disclosure of information concerning the company.

Any use of information, whether directly or indirectly, obtained in the course of professional activities for personal use is strictly prohibited.

Any violation of this rule may result in legal proceedings under the provisions applicable by employment, civil or criminal law.

All the above provisions shall apply in the same way to information shared by our clients. People whose contracts of employment expire or who are no longer bound by a contract of employment with **DEFI GROUP** are required to maintain the confidentiality of this information.

9. Whistleblowing and margin for error



Whenever an employee is faced with an ethical problem or a breach of the rules of this charter, they must inform one of the following managers of their choice:

- their line manager, or their line manager's superior;
- their Human Resources Manager, particularly for matters relating to respect for others;
- Group General Management;
- a staff representative.

DEFI GROUP will ensure any ethical concerns expressed in good faith concerning potentially inappropriate behaviour by an entity, employee or business partner are investigated and that appropriate measures are considered and implemented.

In the event of an investigation, **DEFI GROUP** and the members of its Management Committee will ensure this takes place in compliance with the principles of adversarial proceedings, the presumption of innocence and confidentiality, which may require the protection of individuals and the company.

Any information provided during an investigation will only be communicated to those who need to know about it and no sanctions may be taken by **DEFI GROUP** against any employees who report a concern or breach of the ethics charter in good faith.

Harassment, retaliation or victimization for reporting in good faith actions contrary to this charter will not be tolerated and will result in disciplinary action up to and including termination.

DEFI GROUP gives all employees the right to make errors, in order to give them the possibility of informing their superiors of an error which he committed in his attributions without incurring any sanction, provided that this error is neither intentional or repeated.

“The values we embody are those of a simple but caring company, based on certain rules of behaviour marked by common sense and consistency”

Arnaud Randon

