

ETHICAL CODE

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President's word

ESTECH is a Small or Medium-sized business of high industry technology, design and prototyping.

The trust of our partners confirm our capacity to provide good services and products, in the respect of our values that are transparency, integrity, professionalism, duty, respect of the women and men, collective performance and engagement.

All those values shows our commitment to lead all our activities in an ethical logic, and in the respect of the laws and applicable regulations.

Since 2019, we are engage more than ever in the enhancement of our intern rules of behavior, more precisely in the fight against corruption and the respect of the free concurrence, in the goal of operational continuous improvement in every level. Each of our employees are thus required to look rigorously those rules for which ESTECH cannot tolerate any failure.

Our ethical charter has for inspiration to reaffirm and underline our values, of principles of action, and our conduct rules, described in our ethical charter.

Hervé ROMAN

ESTECH's President

About the charter

Contents

Ethical charter defines the values and the **major action principles** of ESTECH SAS, about all the employees, clients, providers and all the stakeholders.

Furthermore, it has as goal to collect the primary rules of conduct, to adopt by each collaborator.

Incontestable pillar of ESTECH, the ethical charter represent the pedestal of all the intern ethical and transparency procedures, and more precisely about Human Rights, labor law, corruption, concurrence, sustainable development, confidentiality which every collaborator is called to respect.

Scope of the charter

The ESTECH's ethical charter applies to ESTECH SAS and all companies whose capital and / or voting rights are directly or indirectly majority-owned by ESTECH SAS.

Every ESTECH's collaborator is personally responsible for applying the values and principles and for complying with the rules they set out.

The managers have a specific role with regard to their teams in the implementation of the Code of Ethics, whose values, ensure its promotion and respect the rules.

It is very important to underline that the majority of our action principles tells in the present charter rely of legal dispositions, whose the non-respect is apt to lead to sanctions. Any recourse to sanctions is carried out in the respect of the law and the local users.

Our values

ESTECH is founded above strong values. The ESTECH's ethical charter is not an application document of those values but they defines the principles, who govern the activity of ESTECH in harmony with those values.

Integrity and transparency

The integrity needs to represent the pedestal of all of our decisions and practices of ESTECH.

In the intern and extern relationships, the **transparency, trusted source** between all the collaborators of ESTECH, demand clear and objective information communication.

Requirement and professionalism

Requirement and **professionalism** are the pedestal of the success of ESTECH, in the global market that demand every day more performance. Those values built its ambition of **sustainable growth**.

Performance and reactivity

The **satisfaction** of the clients is the key of the success of ESTECH in a long term.

The respect of women and men

The **respect** of women and men, their dignity, their **diversity** and the diversity of their culture is in the middle of the ESTECH **commitment**.

They represent an enrichment for each one, and contribute to the global **performance**.

Collective commitment

All the collaborator of ESTECH contributes collectively of its **growth**.

This common goal is established on solidarity, loyalty, listening, sense of responsibility and team work.

Our principles of action

Fight against corruption

The fight against corruption is, in ESTECH, primary. All the collaborators are **fighting against corruption** in all its forms, active or passive, direct or indirect, from private or public person.

All employees forbid to promise, offer, solicit or accept directly or indirectly an advantage no matter of the form (amount of money, commissions, services, good or nature...) who can be the opposite of the laws or regulations in vigor to obtain, conserve, grant or renewing a market or a commercial advantage or obtain personal advantage.

In this intention, ESTECH has established an instruction set to apply from its employees whose general principles are :

Gifts and invitations

The agreement or the occasional offer of gifts or invitations of a modest value constitutes a legitimate practice in the framework of the commercial relationships.

However, **each collaborator is prohibited from offering or accepting a gift or invitation**, whatever its form, which :

- May have an influence on a decision making
- Would be done in violation of the laws, regulations or instructions in effect at ESTECH

The financial of the political parties

To skip every ambiguity, the **payment of funds** and / or **service furniture** in the name of ESTECH to a party or political organization and of political figures **is forbidden**.

Donating to charity and sponsoring organizations

The donations to charity organizations and the sponsoring with the name of ESTECH have to respect laws, regulation and instructions in force in ESTECH and are subordinate to an interne authorization.

Lobbying

The lobbying actions cannot lead to an offer or a promise of benefit in kind or in cash of a third.

Every lobbying is subordinated to an interne authorization.

Our principles of action

The management of conflict of interest

ESTECH avoids **any situation in which the personal interests** of a collaborator, or those of natural or legal persons with whom he is associated, **could be in conflict with the interests of ESTECH.**

To determine if there is a conflict situation, every employees must be ensure to act the best way for the interest of ESTECH.

The following situations may be considered as likely to lead to such conflicts of interest :

- **Any hold of interest**, directly or indirectly, in a concurrent, a provider, a service provider or a client (actual or potential), except if it is about a purchase of listed titles in the respect of the rules in accordance with the rules on privileged information.
- **Any professional engagement**

Any potential conflict situation has be known to the hierarchy and to the Conformity and Ethical Delegate of ESTECH.

The respect of the confidentiality

ESTECH pays attention to the protection of its confidential information and those of the third.

Each employee therefore refrains from disclosing the confidential information of which he is aware during his activity.

Furthermore, he makes sure to preserve the intellectual property rights, including intellectual, of ESTECH and not to harm those of others.

Prevention of insider trading

Any employee, in the normal conduct of his activity for ESTECH, can have the access of **information which can influence the value of the actions**, options and other chattel values of ESTECH.

As long as they are not disclosed to the public, the informations can have an incidence to the value of the actions, options and other chattel values of ESTECH are considered as privileged informations and must stay confidential.

The use to personal ends or their disclose to whoever before they are communicated to the public **can breaks the intern rules** and are punishable of sanctions like fines and imprisonment.

Accuracy of the management documents

The books of accounts of each entity of ESTECH reflect all the operations faithfully operate (actives, passives and spending...).

Each employee ensure that the informations and the reports communicated to each level of ESTECH retranscribes faithfully and in time all the operations.

To instore a trust relationship with clients and providers

The respect of loyal concurrence

The rules about the competition law have for object **the guarantee of a loyal concurrence** between the companies on the market.

Therefore, each employee agrees to refrain from **participating in agreements between competitors or business partners** whose purpose or effect is :

- To fix up prices and commercial conditions.
- To limit or control the production, the industrial or commercial opportunities
- To divide the markets or the clients also in the case of call offers.
- To boycott certain providers or certain clients
- To share confidential or strategic informations

Balance and control of the relations with the commercial partners

Relations with regards of providers and subcontractors

ESTECH ensures the development of **relationships of trust** and partnership with its suppliers in order to satisfy the best way the expectations of its clients.

The take of the **considerations of the interest** of each and the **respect of fair contractual terms** constitutes the pedestal of the relations between ESTECH and its providers.

Relations in regards to their clients

ETECH pays attention to answer to the needs of its clients with **availability, listening** and **initiative**.

ESTECH is attached to provide products and services of quality at its clients and to improve its technologies and methods with a strong exigence of **innovation and security**.

To respect the employees

Relationships with the employees

ESTECH reaffirm its commitment above all the principles of the following Corporate Social Responsibility principles, especially :

- The application of the national laws and the international conventions
- The respect of the **Human Rights** and the fundamental universal principles whom protect dignity, respect and liberty of the employees.
- A work environment safe and sound, ensuring the **physical and mental integrity**, the health and the security of the personal. This measures are the permanent and absolute priorities.
- The right for the employees to associates to each other and to take a part to collective negotiations.
- The hire of a permanent personal whose the effective is adapted to the sustainable level of the activity, the professional formation, the **respect of the regulation** about the time of work, the participation of the employees to a continuous improvement process.

Protection of the personal datas and good use of the numeric tools

ESTECH is engaged to respect the applicable laws in term of **data protection** with personal character of the employees.

The « good-living » in work

Respect of Human Rights

ESTECH ensure in particular to **the Human Rights and the fundamental universal principles** who protect dignity, respect and freedom of the employees.

In particular, ESTECH strongly condemns :

- All the forced work forms or mandatory
- Work of children
- All different treatments between individuals, based above other criterias than their skills or aptitudes.
- Any physic or mental act of violence or threat of such act.

Protection of the environment

ESTECH is attached to **the respect and the protection of the environment and biodiversity**, especially by the prevention of pollution of any kind, the decrease of the water sample and the waste recovery. Furthermore, ESTECH strives **to limit the consumption of natural resources**, by scrupulously following the consumption indicators.

ESTECH is engaged to increase the **energetic efficacy** of its equipments et to decrease the carbon emissions in its process of production.

The respect of the local communities

ESTECH attached to dialog with the local communities in its center of activity, in order to identify the impacts and the mutual expectations.

ESTECH stays in the permanent effort of the **creation of the value** for the communities, in the respect of the cultures and the local uses, especially in the domain of the economic development and the local culture, education and health.



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