

	<b>CORPORATE SUSTAINABILITY CHARTER</b>		
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## **PURPOSE AND SCOPE**

This document is a **CORPORATE** charter applicable to all **ADVANS** Group subsidiaries worldwide.

The purpose of this charter is to present **ADVANS** sustainability commitments and provisions.

## **REVISION HISTORY**

<i>Revision</i>	<i>Date</i>	<i>Author</i>	<i>Changes</i>
01	12/09/2023	G. DUPONT	Creation
02	12/07/2024	G. DUPONT	Added new provisions regarding nondiscrimination, recruitment, working hours.

### Note:

- This procedure is applicable to these **ADVANS** Group companies: *ELSYS Design (ED)*, *ELSYS Eastern Europe (EEE)*, *ELSYS America (EA)*, *AVISTO Telecom (AV)*, *AVISTO Eastern Europe (AEE)*, *MECAGINE (MEC)*, *MECAGINE Eastern Europe (MEE)* and *ADVANS Portugal (AP)*.
- The text added or changed from the previous revision is visible using Word application activating revision mode.
- A printed version of this document may be outdated. You are responsible for checking its validity. The current version is available on the local **IMS** Corporate Repository.

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## 1. ACRONYMS

ADV	Sales Administration
AV	Avisto Telecom
AEE	Avisto Eastern Europe
AP	Advans Portugal
CEO	Chief Executive Officer
CFO	Chief Finance Officer
EA	Elsys America
EEE	Elsys Eastern Europe -
ED	Elsys Design
GM	General Manager
HR	Human Resources
HRM	Human Resources Manager
IMS	Integrated Management System
ISMS	Information Security Management System
MEC	Mecagine
MEE	Mecagine Eastern Europe
NDA	Non-Disclosure Agreement
QM	Company Quality Manager (ex: EEE Quality Manager)
QD	Quality Director

## 2. MESSAGE FROM PRESIDENT

The success, image and reputation of ADVANS Group and its subsidiaries are the result of your commitment, your talents and your involvement.

The sustainable development of the ADVANS Group is not only desirable but essential. Building a reputation and building the corporate image can only be conceived through the requirement of uncompromising and flawless ethics.

This is why the ADVANS Group Management Committee has made a voluntary commitment to comply with the rules of conduct set out in this charter and asks each employee, regardless of their hierarchical level, to read and respect carefully review these provisions.

If, however, you have any questions about the interpretation of one of these principles, I urge you to consult your line manager and/or the quality department.

The Management Committee and I thank you for your vigilance and your personal involvement in maintaining the integrity and reputation of our group at the highest level, by applying the ethical principles shared by all daily.

*Radomir JOVANOVIĆ*

### 3. PURPOSE OF THIS CHARTER

The purpose of this sustainability charter is to establish a body of guiding principles, compliance with which will ensure that all employees share a common reference in terms of ethics.

This charter does not replace but complements the procedures and supplements the internal regulations of the ADVANS Group companies.

Each employee is responsible for ensuring that their activities are carried out in full compliance with applicable laws and regulations, in accordance with the principles described in this charter.

Also, whenever you think you are faced with an ethical or compliance issue, ask yourself the following questions:

- Is it legal?
- Is it consistent with the values of ADVANS Group and the spirit of this charter?
- Am I able to justify my choice with regard to business ethics?

Any breach of this charter as well as applicable laws and regulations exposes ADVANS Group companies to the risk of seeing their image tarnished, their access to certain markets and the achievement of their objectives compromised. The responsible employee exposes himself to disciplinary sanctions provided for by the internal regulations of the companies of the group.

Any employee who wonders about the application of the sustainability charter or about the conduct to adopt in a particular situation can and must, confidentially, seek the opinion of Management.

ADVANS Group companies have an alert procedure for everyone to report in good faith any suspicion of a possible violation of the law in terms of discrimination, harassment, sexist behavior, ethics, corruption or imminent serious danger. This procedure guarantees efficient and impartial treatment by a commission including members of management and staff. The procedure ensures the protection of whistleblowers.

## **4. ETHICS OF BEHAVIOR WITHIN ADVANS GROUP**

### **4.1 RESPECT OF FUNDAMENTAL RIGHTS**

#### **4.1.1 RESPECT FOR HUMAN RIGHTS**

ADVANS Group (1) is committed to respecting and promoting the fundamental rights resulting from the Universal Declaration of Human Rights, the dignity and value of the human person, the privacy of employees and the equal rights of women and men.

We ensure compliance with the principles defined in the UN Global Compact and OECD relating to human rights, labor standards and the environment.

Likewise, ADVANS Group respects the fundamental conventions of the International Labor Organization (ILO) on freedom of association, the right to collective bargaining and the elimination of child labor, forced or compulsory labor, modern slavery and trafficked employees.

Within the company, a place of common life, it is important to promote good living together through mutual respect and respect for each other's identity. Any discrimination by an employee against other employees for any reason whatsoever cannot be tolerated.

ADVANS Group is committed to promoting equal treatment among all its employees and to having fair employment practices. We collectively oppose all forms of discrimination, and in particular, on grounds of origin, ethnicity, race, morals, age, gender, sexual orientation, political or religious opinions, union membership of individuals or disability.

*(1) ADVANS Group represents the French legal entity ("ADVANS Groupe") as well as all of its direct or indirect French and international subsidiaries.*

#### **4.1.2 WORK OF DISABLED PEOPLE**

Aware of its social responsibility, ADVANS Group pays particular attention to the recruitment and professional integration of disabled workers.

ADVANS Group companies comply with national laws and regulations relating to the work of disabled people and have signed, when this is required, an agreement with the social partners on this point. This agreement is available on the intranet of these companies.

#### **4.1.3 GENDER EQUALITY**

ADVANS Group companies have signed an agreement on professional equality between women and men which is available on the intranet of these companies.

Equality between men and women is a key element of the equal opportunities policy. ADVANS Group bans any form of discrimination in this regard.

In particular, childcare leaves in order to fulfil family responsibilities must be authorized to employees without any gender consideration (male, female or neutral).

#### 4.1.4 SEXUAL AND MORAL HARASSMENT

No employee should harass another employee for any reason.

Harassment, whether sexual or moral, may represent a violation of the law and may expose the responsible employee, and possibly ADVANS Group, to legal, financial and reputational consequences.

This subject is developed in the internal regulations of the ADVANS Group subsidiary companies and available on the intranet of these companies.

ADVANS Group companies have an alert procedure to guarantee effective and impartial processing. Alerts are processed by a committee including members of management and staff. The procedure ensures protection for whistleblowers.

#### 4.1.5 HEALTH AND SAFETY REGULATIONS

ADVANS Group companies, as employers, undertake to provide a working environment that meets the laws and regulations relating to the environment, health and safety.

Occupational health and safety, however, depends on each of us. Each employee must ensure that their actions do not lead to or aggravate any risk for themselves or for others. He must report to his hierarchy and to person responsible (Human Resources Department or Health & Safety officer within subsidiary) any behavior, installation or potential risk that could compromise the safety of his work environment, as well as any accident or incident of which he may be aware.

#### 4.1.6 PROTECTION OF CONFIDENTIAL DATA

ADVANS Group companies are involved in competitive activities, they attach particular importance to the protection of their sensitive data: any information not made public must be considered by each of us as confidential.

During their work, employees may have access to certain confidential information (such as costs, margins, contracts, salaries, commercial strategies, customer lists, etc - list is not exhaustive) which is decisive for the smooth running of ADVANS Group's business

No one is authorized, other than within a framework of confidentiality guaranteed in particular contractually, to disclose any of this information to anyone (person, company, corporation, association or other entity) for any reason whatsoever. or, both during his period of employment within the ADVANS Group and after his departure.

Particular attention must be paid to the information communicated by employees on social networks.

Personal confidential information is information relating to collaborators and will also be mentioned in the paragraph on respect for privacy.

ADVANS Group undertakes to maintain an Information Security Management System in accordance with the ISO-27001 international standard.

#### 4.1.7 RESPECT OF PRIVACY

Each employee must be treated with dignity and with full respect for their privacy.

ADVANS Group undertakes to ensure the confidentiality and processing of the personal information of its employees in accordance with the internal rules and the regulations in force relating to the Data Protection Laws (1).

The GDPR policy specifying how ADVANS Group processes the personal data of its employees and stakeholders is available on IMS Corporate Quality Repository.

- (1) In particular: European Regulation No. 2016/679 of April 27, 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (“GDPR”) as well as Law No. 78-17 of January 6, 1978 as amended relating to data processing, files and freedoms (together the “Data Protection Laws”).

#### 4.1.8 RESPONSIBLE RECRUITMENT

ADVANS Group believes that employment is a basic right, and nobody should have to pay money or in kind for it. We ensure that all employment opportunities with ADVANS Group companies are available freely, solely based on the merit of candidates. We or any of the workforce providers engaged by us do not accept any payment or benefit either in cash or kind for the employment opportunities and will bear all the costs associated with recruitment of the employee. In case any deviation from the above policy is experienced, the company will reimburse the cost to the employee within a reasonable duration.

Workforce service providers should take responsibility of ensuring the workers employed by ADVANS Group companies have not been charged money by any middlemen in lieu of the promise for job or under any other pretext. In case such an incident is discovered, the company will reimburse the money to the worker and charge it to the supplier and the same shall be adjusted from the professional fees of the relevant agencies.

#### 4.1.9 DECENT WORKING HOURS

All ADVANS Group companies must define and communicate to employees the maximum number of working hours, limits for overtime, number of weekly rest days in respect to the local regulatory thresholds.

All employees of ADVANS Group companies must benefit from a two-day weekly rest period. 60 hours of work per week, including overtime, shall be considered as a maximum.



## 4.2 RESPONSIBILITIES OF COLLABORATORS

### 4.2.1 ASSET PROTECTION

ADVANS Group companies are companies providing services on behalf of various clients.

Maintaining the integrity of the assets of ADVANS Group is a guarantee of its durability and must mobilize each of us. As such, everyone must take care to protect them from any degradation, loss, theft, damage, negligence, waste and not to divert them or use them for personal purposes.

By assets, we mean:

- Movable property (vehicles, furniture, computers, telephones, etc.),
- Buildings,
- Intangible assets identified and defined by law, but also ideas or know-how developed by employees as part of their assignments. Lists of customers, prospects and subcontractors or suppliers, technical or commercial practices, commercial offers and technical studies, all data or information to which employees have access in the performance of their duties are part of the assets of ADVANS Group and must be protected.

The IT charter which governs the use of IT resources and Internet services is available on the intranet.

### 4.2.2 MISUSE OF PROPERTY

The misuse of company assets is an offense which consists, for any manager or his delegate, in knowingly using the assets, credit, powers or votes of the company for personal, direct or indirect purposes.

Breach of trust is an offense that consists of disposing of property belonging to one's company contrary to what was agreed. The misuse of property is an offense exposing its perpetrator to criminal prosecution.

### 4.2.3 REIMBURSEMENT OF EXPENSE NOTES

The costs incurred by employees in the exercise of their functions, or their missions, are covered by the companies of the ADVANS Group in compliance with the procedures in force and in particular the invitation limits.

### 4.2.4 COMPLIANCE WITH DELEGATIONS OF POWERS AND SIGNATURE

The delegations of power or signature are an act of trust from the leaders towards the management and the employees.

Employees who have received a delegation of powers or signature ensure that they comply with the terms and only commit their company within the strict limits of the powers and delegations, or sub-delegations granted to them. Any contrary behavior would be disloyal to the delegator and his company.

Any agent who grants special written power to sign an act, agreement or other concerning a specific operation or a category of specific operations does so under his full responsibility.

## 5. ETHICS OF RELATIONS WITH ADVANS GROUP STAKEHOLDERS

### 5.1 BUSINESS ETHICS RIGHTS

#### 5.1.1 CONFLICTS OF INTEREST

Out of loyalty to ADVANS Group, employees must avoid any situation where their personal interests (or those of a natural or legal person to whom they are linked) could come into conflict with those of ADVANS Group.

Faced with a risk of conflict of interest or in the event of doubt, the employee must, in a spirit of loyalty and transparency, inform in writing and immediately his direct manager and the Direction and refrain from initiating or maintaining any relationship with the third party concerned until a decision is reached on the subject.

In order to limit the risks of conflicts of interest, ADVANS Group asks its employees in particular:

- not to exercise a professional activity with a supplier, customer or competitor.
- not to hold any significant financial interest in a supplier, customer or competitor of the company without the prior written authorization of the line manager notified to Direction.
- to notify his immediate superior and the Direction of any commercial relationship of the company with a relative, a relative or with a company controlled by a relative or relative prior to the transaction or in any case as soon as it arises. knowledge.
- to notify their line manager and the Management of all elective and corporate offices, as well as any office held by a close relative
- to refrain from using information obtained in the course of his duties for personal purposes or from communicating it publicly (on social networks in particular)

#### 5.1.2 PREVENTION AND CONTROL AGAINST CORRUPTION

Acts of corruption distort the normal, fair and fair functioning of markets. ADVANS Group adopts a zero-tolerance policy for corruption.

Whatever the circumstances and the interests at stake, the prevention and detection of corrupt actions are essential to the preservation of the long-term interests of ADVANS Group. They must be everyone's business, who collectively have not only the obligation not to participate in corrupt actions, but the professional duty to do everything possible, within our means, to help prevent corruption or terminate it if it becomes known to us.

The participation of an employee in an act of corruption is professional misconduct, punishable without prejudice to any legal proceedings and administrative, civil and criminal sanctions.

Two types of corruption can be distinguished:

- active corruption which consists in providing an advantage to others in order to divert a decision-making mechanism (authorization, right, supply, market, contract, etc.)
- passive corruption, which consists in receiving an advantage in return for the diversion of a decision-making mechanism (authorization, right, supply, market, contract, etc.).

Consequently, it is prohibited to receive, pay, offer or accept bribes or grant undue advantages or promises directly or through a paid intermediary, to an elected official, employee of an administrative

entity or a private person for the purpose obtain preferential treatment or influence the outcome of a negotiation involving an ADVANS Group company.

The payment of “facilitation payments” to public officials intended to carry out or speed up certain administrative formalities is also prohibited, except in the case of compelling reasons (health, safety of an employee, etc.).

It is reminded in this respect that no payment or collection by an ADVANS Group company can be made in cash.

### 5.1.3 GIFTS AND INVITATIONS

Gifts exchanged between business partners are courtesies intended to establish and maintain business relationships.

The acceptance of so-called "corporate" gifts, invitations to events and meals must fall within this area of civility, remain within very reasonable limits and reflect exclusively the concern to improve commercial relations with customers and suppliers without be likely to alter, inside and outside the company, the image and reputation of ADVANS Group, its employees and managers.

Everyone should ask themselves whether a gift received or offered is likely to alter the impartiality of the person receiving it or is likely to suggest to the person who is at the origin of it that it is so. If the answer is yes, the gift should be politely declined or should not be offered. In case of doubt, the line manager and management may be questioned.

In any case, employees undertake never to solicit it.

In the specific case of gifts, a maximum threshold of 250 euros is set per person and per year. (except in the case of redistribution to teams). These gifts must be declared from a threshold of 50 euros.

Business invitations and business meals are not affected by this threshold.

However, the invitation to travel received from suppliers, intermediaries or customers must receive the prior written authorization of the Department concerned.

The gifts offered must also be symbolic and not exceed, in total per recipient and per year, 250 euros (excluding business meals and business invitations which must be proportionate to the status of the guest).

If in doubt about the conditions of application of these independence rules, employees are strongly encouraged to contact their line manager and/or management.

### 5.1.4 FRAUD PREVENTION

Fraud is considered to be any voluntary and concealed action or omission, committed with the intention of deceiving or circumventing the laws in force or the rules of ADVANS Group, with the aim of obtaining an undue material or moral advantage for the fraudster. or for a third party.

Fraud takes many forms: theft of money, property, data, willful alteration, concealment or destruction of documents, false entries or false declarations, manipulation of accounts, counterfeiting and fraud. The participation of an employee in an act of fraud is professional misconduct, punishable without prejudice to any legal proceedings and penalties provided for by law.

### 5.1.5 LAW OF THE COMPETITION

Free and fair competition is a key success factor for ADVANS Group in the markets in which it operates.

As such, ADVANS Group:

- complies with the rules of competition law, both in its purchases and in its sales, in France and abroad, in the private or public domains.
- condemns any abuse of a dominant position and any agreement between competitors whose purpose or effect would be to prevent or limit competition.

Any incident or doubt concerning competition law must be brought to the attention of Management in order to receive appropriate and diligent treatment.

Anti-competitive conduct includes, but is not limited to, the following attitudes:

- abuse of dominant position: it is illegal for a company to take advantage of its dominance in a market (including locally) to block access to its competitors and to hinder the initiatives of new competitors to enter the market in the objective of being able to control the market for its own benefit to the detriment of the regulations of free competition and freedom of prices.
- price fixing: Price fixing between competitors, directly or indirectly, is prohibited and constitutes a violation of competition law.
- unlawful agreements: an agreement is a formal or informal agreement concluded with the aim of curbing competition, increasing or limiting the fall in prices on a market, regardless of the scale (city, region, country). In practice, this may involve market sharing, agreement on sale or purchase prices, etc.

Employees will refrain from any conduct that would violate competition law and in particular:

- to participate in any meeting bringing together several market players whose explicit or implicit purpose would be to set prices or price changes on this market,
- to exchange with competitors non-public, precise information on the activity, the marketing of products, the submission to calls for tenders... Of course, the study of the competition, its positioning, its projects and its prices based on public data are authorized and contribute to the effectiveness of the competitive positioning of ADVANS Group. Likewise, the communication of data to professional bodies for statistical purposes,
- to obtain, by any means whatsoever, information not made public by its competitors.

For information, it is recalled that anti-competitive practices are sanctioned by fines proportional to the turnover of the groups and not that of the perpetrator of the offense and can be colossal.

They also tarnish the reputation of the group.

### 5.1.6 INTELLECTUAL PROPERTY

ADVANS Group allocates significant financial and human resources to innovation as well as financial and material support to innovative start-ups. Creating innovative products, processes and ideas is a valuable asset. All these documents or information come under the intellectual property or know-how which is the strength of ADVANS Group.

Each of us must work to protect them.

This protection includes measures such as passwords for electronic data, locked storage places for paper documentation, careful handling of electronic or paper mail, the absence of confidential discussions in public places.

In addition, employees will take care to respect the intellectual property of others.

It is prohibited to appropriate in a professional context information from third parties that may be considered confidential or to use without authorization, infringe or plagiarize any intellectual property rights of a third party (including patents, copyrights, trademarks or trade secrets).

Everyone is also prohibited from making illegal copies of the software used by ADVANS Group or from making unauthorized use of said software.

### 5.1.7 COMPLIANCE WITH PERSONAL DATA PROTECTION LAWS

ADVANS Group undertakes to comply with the Data Protection Laws when collecting and processing personal data carried out within the framework of its activity, and in particular to:

- collect adequate, relevant personal data necessary for specific, explicit and legitimate purposes;
- keep a record of processing activities;
- guarantee data security and confidentiality;
- respect its obligation to inform and ensure the effective exercise of the rights of the persons concerned, in particular their rights of access, rectification, erasure, portability of their data, limitation and opposition to processing;
- carry out an impact analysis when the processing is likely to cause a high risk to the rights and freedoms of individuals.

ADVANS Group has appointed a Data Protection Officer, whose main mission is to inform and advise ADVANS Group and its employees on their obligations when they implement the processing of personal data. Employees can contact him at the following address: [dpo@advans-group.com](mailto:dpo@advans-group.com) or, depending on the company concerned (for instance [dpo@avisto.com](mailto:dpo@avisto.com) or [dpo@elsys-design.com](mailto:dpo@elsys-design.com) or [dpo@mecagine.com](mailto:dpo@mecagine.com) )

## 5.2 RELATIONS WITH DEFINED THIRD PARTIES

### 5.2.1 RELATIONS WITH SUPPLIERS

In order to maintain a lasting relationship of trust with its suppliers, ADVANS Groups undertakes to treat them with fairness and honesty and in return expects reciprocity on the transparency of the processes. To do this, ADVANS Group relies on the company's internal procedures such as the purchasing procedure.

The latter aim in particular to provide a framework for the selection and evaluation of suppliers for the purchase of services, works or supplies.

ADVANS Group commits its suppliers and intermediaries to adopt, if they have not already done so, ethical, environmental and societal rules, and also to respect practices compatible with its values.

Where applicable, suppliers must adhere to the ADVANS Group CSR Supplier code of conduct (CORP-METH-063).

### 5.2.2 CUSTOMER RELATIONS

Employees of ADVANS Group companies must serve customers with diligence, loyalty, neutrality and discretion.

Customers are entitled to equal service by advising them in the fairest way and directing them to the most appropriate offer. Employees refrain from offering any formulas which they might think are not in the interest of the client. Employees carry out the mission defined in agreement with the client in complete independence and transparency in compliance with the rules specific to their activity and refrain from putting their personal interests before those of their clients.

ADVANS Group companies undertake to take all necessary measures to avoid any bargaining offence. They ensure that the services performed on behalf of our clients can never be considered as an illicit loan of labour.

ADVANS Group undertakes to ensure that the group's employees are systematically informed of the prevention plans applicable to the mission they carry out on the client site and that they have a mission order before the actual start of the mission on customer site.

## **6. ADVANS GROUP, THE ENVIRONMENT AND SOCIETY**

### **6.1 SOCIETAL CONTRIBUTION**

#### **6.1.1 PATRONAGE AND SPONSORSHIP**

ADVANS Group carries out sponsorship and patronage actions when they correspond to its communication and internal mobilization objectives, or contribute to its image and its civic engagement. ADVANS Group organizes its sponsorship and patronage actions around 3 priority areas:

- Technique (computing, electronics or mechanics)
- The sport
- The environment/health/solidarity

These actions are carried out in accordance with applicable laws and regulations and must in no way seek to influence or give the appearance of influencing the decision of a potential client or public decision-maker.

#### **6.1.2 SOCIAL DIALOGUE**

ADVANS Group respects the right of its employees to form or join trade unions or worker organizations of their choice and to organize themselves to participate in collective negotiations.

ADVANS Group respects the role, representation and responsibility of staff representatives, by providing them with the means necessary for their missions and undertakes to communicate and negotiate openly with them on issues of collective interest.

#### **6.1.3 FUNDING OF POLITICAL LIFE**

ADVANS Group respects the commitments of its employees who, as citizens, participate or wish to participate in public life.

Any employee concerned must however refrain from morally or financially committing ADVANS Group or one of its entities to its activities.

Similarly, any employee involved in the decisions of a State, a government agency or a public authority must refrain from taking part in a decision of this body which would directly or indirectly concern ADVANS Group.

Finally, and in the extension of this principle, ADVANS Group does not pay funds or provide services to any political party, or to any holder of public office or candidate for such office.



## 6.2 ENVIRONMENTAL PROTECTION

ADVANS Group respects the environment and is committed to a proactive approach in order to provide concrete responses to the challenges of energy transition and the preservation of resources.

Each employee strives to participate in the reduction of his environmental footprint and that of his activity:

- in his daily work, he takes care to reduce his consumption of paper, lighting, polluting travel.
- in the exercise of ADVANS Group's businesses, it systematically takes into account the environmental aspect at all stages: purchase, development cycle, management and maintenance of IT equipment.

ADVANS Group has set objectives and is implementing action plans in the fight against climate change, sustainable mobility, waste management and certifications. The ADVANS Group Sustainability charter is published on the company's website.

ADVANS Group undertakes to maintain an Environmental Management System in accordance with the ISO-14001 international standard.