



**ALLEN**  
Code of Conduct

Customers | Suppliers | Data Security | Health | Safety | Environment | Sustainability | Compliance

Sandra Berger and Pierre Marcel as managing directors of ALTEN GmbH in Germany ensure that the Anti Corruption Code of Conduct of ALTEN Group will be taken over and will even exceed in some points. That is what we stand for within the ALTEN Group in Germany:

- › Sandra Berger and Pierre Marcel as managing directors of ALTEN GmbH and BeOne Group GmbH
- › Pierre Marcel and Dr. Marcel Klehr as managing directors of ALTEN Technology GmbH
- › Helene Rotter as managing director of ALTEN Austria GmbH
- › Dr. Matthias Göhner and Sandra Berger as managing directors of ALTEN Consulting Services GmbH
- › Derek Wagner as managing director of EEINS GmbH
- › Matthias Goltz, Thomas Neukam and Olav Liebing as managing directors of iconec GmbH
- › Matthias Goltz, Thomas Neukam and Olav Liebing as managing directors of expond GmbH

The Anti-Corruption Code of Conduct is available here: <https://www.alten.com/wp-content/uploads/2019/04/Ethic-Compliance-Charter-2019-EN.pdf>



## CHAIRMAN'S INTRODUCTION

Our international reach and our leadership in the engineering and technology consulting services market gives us a responsibility to all our stakeholders. For this reason, the ALTEN Group has put Ethics and Sustainable Development at the heart of its strategy and is building its growth around two basic principles: integrity and transparency.

This ambition, based on the values set out in our FORCES policy, takes the form of practical measures in three key areas: Respect for the environment and human rights are one of the pillars of our corporate social responsibility. Each entity plays an active role in promoting the Sustainability Charter, a token of our actions in this area.

As a signatory to the United Nations Global Compact since July 2010 and through its commitment to upholding OECD Guidelines, ALTEN is determined to outlaw all forms of corruption in its business activities. This Anti-Corruption Code is a guide to be applied day-to-day to prevent and combat corruption and conflicts

of interest. It supplements our Ethics and Compliance Charter and reiterates the key principles to be upheld in the area of business ethics. Combating corruption is a matter for all Group employees. We must lead by example and bring this message of „zero tolerance“ to all our stakeholders.

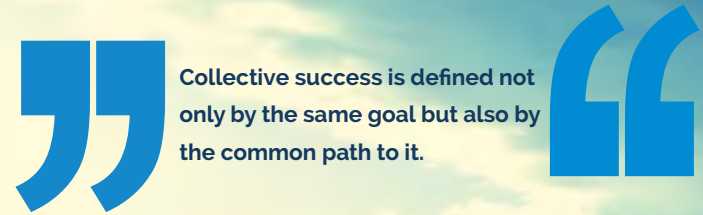
Finally, ALTEN is committed to maintaining lasting relations with our stakeholders. It is up to us to develop trust-based relationships with our employees, clients, suppliers and shareholders. Each employee, irrespective of hierarchical level or responsibilities, must act in accordance with the requirements of this Code and the Group's ethical culture.

**Ethics is everyone's business and I am convinced that it is through all of our actions as individuals that our policy will stand the test of time and be effective.**

**Simon Azoulay Chairman and Chief Executive Officer**



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Collective success is defined not only by the same goal but also by the common path to it.

## 1 PREAMBLE

ALTEN stands for the values and norms described in this Code of Conduct. This is because we are convinced that the principles set out here form the basis for a successful company. We are committed to ensuring that our actions vis-à-vis the various stakeholders are guided by the following principles. We deliberately focus on respectful and appreciative interaction with our stakeholders because it is only in this way that we can ensure we are perceived positively from within and outside the Group and can secure our positioning as a successful market participant in a strong competitive environment over the long term. These guiding principles are an expression of our understanding of conduct that is ethically and socially correct, environmentally friendly and conserves resources.

his Code of Conduct was created with the aim of providing our managers and our current and future employees with clear guiding principles.

Especially in our everyday interaction, these guidelines should be regarded as describing an ideal state which we can only achieve together. Despite the freedom experienced at ALTEN, a desire for orientation is always present. These guidelines are therefore intended not to limit individual freedom but to strengthen each employee in his or her personal responsibility, while at the same time motivating him or her to act as part of a team.

For the future, ALTEN undertakes to supplement the Code of Conduct with guidelines for personnel management and cooperation within the company. The principles are intended to form the basis for successful cooperation, thus guaranteeing that all stakeholders have a positive image of the Group as an employer.

That is because: „The behaviour of each individual secures the success of the company as a whole“.





You can recognise the truly successful by how they deal with others.



## 2 SCOPE AND RESPONSIBILITY

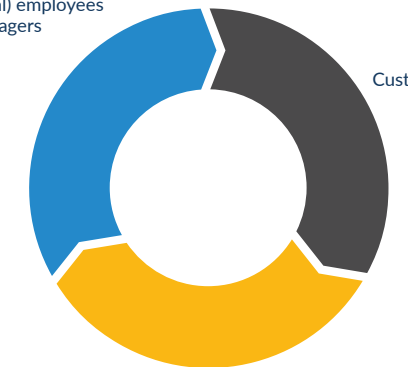
By undertaking to abide by the ten principles of the United Nations Global Compacts, the French parent company ALTEN S. A. is setting a high standard for cooperation and for responsibility for human rights, working and commitments with regard to the environment and sustainability. ALTEN in Germany complies with these standards and regards itself as under an obligation to conditions adhere consistently to the following guidelines and principles. This Code of Conduct applies to all employees in Germany and Austria.

In addition to the defined expectations ALTEN has of all employees, managers and other stakeholders, the Code of Conduct also serves to identify brand-compliant, integral behaviour and provide guiding principles.

The principles defined here complete our understanding of ethically and socially correct behaviour, a good relationship between managers and employees and the aspiration to enter into fair dealings with customers, suppliers and other stakeholders.

### Stakeholders of the ALTEN Group

(Potential) employees and managers



Customers and suppliers

The public and the media



The future is the result  
of how we, together,  
change the present.



### 3 PRINCIPLES

#### 3.1 COOPERATION WITH CUSTOMERS AND SUPPLIERS

Customer satisfaction is one of the most important factors in our success. Interacting with our customers and suppliers professionally and in a spirit of partners-hip is therefore one of our aspirations as a Group that applies DIN EN ISO 9001 and DIN EN 9100.

- We stand for reliable, punctual and transparent order processing. Friendly and businesslike communication, together with an appreciative and respectful approach, form the basis of our communication.
- We strive for a continuous improvement process in order to secure and strengthen our position on the market in the long term. That is why we work together and actively to optimise all processes across the company, with the objective in particular of identifying risks at an early stage, assessing and mitigating them.
- Within the context of risk management, we undertake to train employees about quality, to develop an awareness of responsibility for quality management and to motivate each and every employee to fulfil our high quality standards.
- We encourage our business partners, customers and suppliers to abide by the principles set out in this Code of Conduct and thus themselves set an example in the area of sustainability.



Investment can be made in data protection measures. The confidence of customers has to be earned.



### 3.2 HANDLING INFORMATION

Due to the rapid further development of information technology in recent years, ALTEN too has to meet the new challenges arising in the fields of information security and data protection. Adequate protection and security for company-related information is therefore one of the fundamental prerequisites for our daily work.

- We bear responsibility for the protection of confidential customer data and information. We base our information security standards on ISO/IEC 27001 and are guided by the measures and recommendations set out in the IT basis protection catalogue of Germany's Federal Office for Information Security (Bundesamt für Sicherheit in der Informationstechnik, BSI).
- We protect personal data in line with the stipulations of the German Federal Data Protection Act (Bundesdatenschutzgesetz, BDSG). Furthermore, we are committed to ensuring a high level of confidentiality in all parts of the company, with the objective of protecting information to the extent necessary.
- We continuously invest in maintaining and improving our technical infrastructure and work processes and ensuring appropriate information levels in relation to information security and data protection. Moreover, we seek to train our employees and raise their awareness in order to create and maintain enhanced awareness in these areas.





The most intelligent investment a company can make is to invest in its employees' health.



### 3.3 HEALTH AND SAFETY

Occupational safety and the health of our employees go hand in hand with the efficiency and quality of ALTEN as a sustainable employer. The core element is the definition of the concept of health by the WHO, which forms the basis for our efforts to ensure the health and safety of our employees:

**“Health is a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity”.**

[Constitution of the WHO as at 8 May 2014]

- We comply strictly to the regulations, specifications and standards of the legislator for the promotion of health and safety in the workplace. In this regard, our managers bear special responsibility. They are responsible for compliance with protective measures in respect of themselves and their employees.
- We regard accident-free work as an achievable objective. Preventive measures are paramount in achieving this. Full clarification, a comprehensive information and training policy, and health & safety officers appointed from within and outside the Group help achieve this goal.
- Our commitment extends beyond the minimum requirements stipulated by the legislator and our health and safety policy is already based on the OHSAS 18001 certification standards.
- We ensure the wellbeing of our employees, promote the preservation of good health and make our contribution to prevention and the taking of appropriate precautions.





Sustainability is the best means of ensuring a tomorrow that is worth having.



### 3.4 DEALING WITH RESOURCES AND THE

Since 2012, ALTEN has been certified in accordance with EN ISO 14001/EMAS and is always aware of its responsibility for the environment because, as we are also a service provider, we have to remember that our world's resources are finite. ALTEN therefore promotes and demands environmentally conscious action on the part of its employees in their everyday work and thus reaffirms the following principles.

- We are committed to sustainability in every form, which is ensured by our forward-looking environmentally friendly company policies. Above all, this means an economical and responsible approach to all available resources.
- We comply with all legal stipulations and requirements in the area of environmental protection and endeavour to continuously improve our environmental performance.
- Our commitments extend beyond our obligations as an employer and we support and foster environmentally sound behaviour on the part of our employees, customers and suppliers.

### 3.5 SOCIAL SUSTAINABILITY

For ALTEN, social sustainability in the corporate sense primarily means adhering to the ten principles of the United Nations Global Compact. To achieve this goal, we never shy away from our commitment to respectful relations with each other and compliance with applicable working standards.

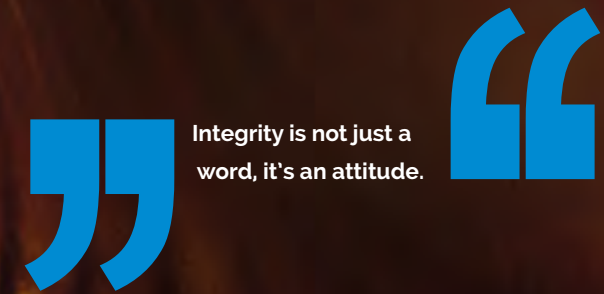
- We respect the rights and dignity of every individual.
- We abide by the legal provisions on fair working conditions and commensurate remuneration and in all respects provide a safe working environment for our employees. This includes having due regard for the rights of the individual and safeguarding the privacy of every employee.
- We respect the right to collective bargaining and freedom of association.
- We comply strictly with the legal provisions and guidelines on preventing discrimination in every form. This includes employing people on the basis of their suitability and achievements. Equality of opportunity and treatment are a top priority in all areas of our business.



A sense of community comes from being there for each other, with each other.







” Integrity is not just a word, it’s an attitude. “

### 3.6 COMPLIANCE

ALTEN undertakes to comply with all applicable laws and guidelines relevant in our cooperation with our respective stakeholders. In the following principles we have summarised our understanding of integrity and of compliance with the law.

#### **Business relationships and competition**

- We always pay due regard to the integrity of our relationships with business partners, customers, suppliers and competitors.
- Without exception, we comply with the provisions of antitrust and competition law.

#### **Corruption**

- We condemn the abuse of business relationships for private or commercial gain and are committed to fighting corruption. This includes strictly rejecting gratuities, invitations, bribes or kickbacks and all other forms of possible active or passive corruption.
- We examine all sponsoring activities or donations for charitable purposes with the utmost diligence. We never lose sight of our responsibility for combating corruption.

#### **Financial stability and reporting**

- To ensure a high level of transparency, we comply with the legal provisions covering obligations to retain documents and annual reporting.
- We stand for healthy growth and financial stability. For that reason, we have always set great store by self-financing and sustainable company development, preferring to secure long-term earnings over short-term profit.





#### 4 SERVICE

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