

CORPORATE & ETHICS CHARTER

CODE OF CONDUCT



SIMPLIFICATION
is our **INNOVATION**

Radiall is a team rich in its diversity and united behind a single ambition: to simplify the lives of those who innovate. We aspire to provide interconnection technologies that are so easy to implement, you can no longer imagine working without them. Our men and women are passionate, inquisitive and bold: the relationship founded on trust that they have built with you underpins all that we do.

Your challenges motivate us to do everything we can to be the first to support you in your product developments. Our commitment to you today is the promise of our future investment. Simplification starts with us, and its true value is revealed in you.

OUR MISSION OUR COMMITMENT

Pierre Gattaz
Chairman of the Executive Board

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PERSONAL RESPONSIBILITY

This Charter applies to all employees and relationships with Radiall Group partners. "Partner" in this context refers to any person working with us or representing us—particularly subcontractors, distributors, contracting parties, suppliers and customers.

The principles of the Charter are upheld by the Executive Board of the Company. Management is responsible for communicating the principles set out to the Company's employees and partners and to ensure their correct implementation.

EVERY RADIALL EMPLOYEE HAS A RESPONSIBILITY TO RESPECT THE PRINCIPLES AND OPERATIONAL ADVICE SET OUT IN THIS DOCUMENT AND MUST BEHAVE ETHICALLY AND WITH INTEGRITY IN ALL CIRCUMSTANCES.

Every employee and any individual or company called upon to represent Radiall is referred to in this Charter. It is given to every new employee and can be downloaded from the Company's intranet site and website (www.radiall.com).

Regarding anti-corruption requirements, and more specifically those imposed by French Law n° 2016-1691 of December 9, 2016 on transparency, anti-corruption and the modernization of the economy, known as the Sapin 2 Law, this Charter includes the elements contained in the "Middlenext Anti-Corruption Code" (available to download from the site www.middlenext.com).



ACTION TO BE TAKEN WHEN AN INFRINGEMENT IS IDENTIFIED

We recognize that certain situations are complex. In ethical matters, there is often a trade-off between competing principles. Our Charter sets the Group's standards within a number of situations. It is recommended that every person reads the Charter in full in order to understand Radiall's expectations and standards in regard to ethics. This document is a framework that will assist you when faced with a question or concern.

Of course, no document can predict or cover all the situations that could arise. Therefore, each time you think you are faced with this kind of decision, please ask yourself the following questions:

- Does it comply with the Charter?
- Is it legal?
- Is it in line with our ethical principles of integrity, respect and transparency?
- Does it reflect well on the Company?
- Am I likely to have a negative impact on the Company? On our partners? And would I be able to justify my decision?
- Would I be comfortable if my decision was made public internally or externally?

If the answer to any of the above questions is "NO" or if you are UNSURE, or if you have witnessed behavior that contravenes the rules of the Charter or that you consider to be inappropriate, the GOLDEN RULE is to report it, depending on its type, to your Line Manager, Human Resources, the Site Director or to the Ethics Committee, via the reporting mechanism set out in this Charter.

It is essential to DISCUSS IT OPENLY BEFORE TAKING ACTION.

Radiall will not tolerate any form of retaliation whatsoever against any employee who has, in good faith, reported a breach of this Charter.

CONSEQUENCES

Non-compliance with the Charter could be harmful and have serious consequences for the Company, its corporate managers and the individuals involved.

We could be exposed to the payment of fines and even imprisonment in the case of serious infringement.

Depending on the infringement, disciplinary measures are likely to be taken internally or legally against those involved, in accordance with the rules and regulations established within the Company.

OUR ETHICS

Teamwork is encouraged and successes, as well as failures, should be shared. We must give credit to the ideas of others, know how to listen with tolerance and share information freely in compliance with the Group's confidentiality rules.

Lack of respect, in particular through abusive speech or inappropriate gestures, or racist, discriminatory or sexual remarks, is unacceptable. Disparagement of colleagues is also contrary to Radiall's ethics.

Radiall Group respects the law and promotes loyalty, trust, solidarity and respect for the cultural differences of each country in which it operates.

The Company has defined the rules it intends to establish with

Radiall Group conducts its activities with honesty and integrity, while respecting the rights and interests of its employees. It promotes a spirit of mutual respect and openness in the working environment, in which every individual is duty bound to be responsible for the reputation of the Company.

its customers, suppliers, the authorities, other companies in the market, the environment, and individuals. These principles guide us in adopting the right behavior in certain circumstances, in order to preserve and promote Radiall's good name. Non-compliance with the Ethics Charter exposes our organization and its employees to serious damage and could harm, in particular, our activity, the environment and individuals, as well as the reputation that we have all helped to build together.

As such, all of our employees within Radiall Group and its subsidiaries must learn, by referring to our Ethics Charter, to comply with the rules and legislation applicable to their work. This Charter applies to all our corporate officers, operational steering committee members,

management staff and employees.

Radiall strives to encourage all partners in its activities to adopt the rules set out in the Charter and to comply with the counterfeit policy, which can be downloaded on the Company website (www.radiall.com).

Radiall will actively monitor and enforce strict compliance with the rules set forth. Failure to comply with them may result in disciplinary action including dismissal, as well as criminal or civil action before the courts.

The Charter cannot set out all the applicable rules, strategies and practices in detail. Where there are specific directives or rules which may clarify certain points, the Charter refers to them.



ETHICS COMMITTEE

ROLE OF THE ETHICS COMMITTEE

The role of the Ethics Committee is to receive and process the alerts that are reported via the internal whistle-blowing system.

APPOINTMENT OF ITS MEMBERS

The members of the Ethics Committee are appointed by the Chairman of the Executive Board for a term of three years.

They are recognized within the Company for their skills, integrity, loyalty and their comprehensive understanding of the Company.

COMMITMENT OF THE MEMBERS

Each member of the Committee commits to:

- Ensure, under all circumstances, strict confidentiality regarding the identity of the person reporting the incident, the facts of the report and the individuals covered by the report.
- Take all precautions necessary to preserve the information and the evidence submitted or gathered during the course of the investigation.
- Follow the procedure implemented for whistle-blowing.
- Make all the necessary arrangements to safely destroy or retain the facts of the case enabling identification of the person reporting the incident and the individuals involved, where no further action is taken.
- Inform the governing bodies, a minimum of twice a year, where applicable, of these reports while preserving the confidentiality guaranteed by the system.
- Disclose any identified failings in order to bring the risk mapping up to date.

OUR VALUES

Our corporate culture is our greatest asset. It “encourages us to move forward”. It connects the organization to its employees and it leads to something UNIQUE: sharing the same values in order to achieve the same objectives and be the best, while being aware that it is the source of our longevity. Beyond our differences, our culture creates a bond between us beyond explanation, which allows us to understand one another and move in the same direction.



Our company values are reflected in the behavior and actions expected of our employees.

DARE TO BE AUDACIOUS

Audacity is our fuel! Taking risks and pushing our limits are challenges that stimulate our creativity. We do not say “It is impossible!” Instead, we say, “How do we do it?” It is from this mentality that solutions beyond what our customers can imagine emerge. Inventing to surprise—this is how we make the difference.



MAKE IT SIMPLE

Simplicity is proof of genius. We encourage agility, we focus on the essentials, we value direct communication, and we strengthen autonomy in decision-making. Simplifying our way of working also means making the life of our customers and partners easier. To be accelerators of innovation is our mission.



BE GENUINE

To be genuine is part of our DNA. We listen to each other with kindness and we speak honestly, without reservation. Being ourselves, regardless of the circumstances, guarantees mutual trust and personal growth so that we move forward together. We are proud of fulfilling our promises!



GROW TOGETHER

Growing together and helping grow the world around us is our signature. We are a community rich in diversity and with a strong team spirit, which is open to all of those around us. We strive to be exemplary to our customers, our partners and our environment. Sharing our values with enthusiasm results in a positive footprint everywhere.

OUR INTEGRITY

Excellence requires every one of us to conduct our business in an exemplary way. Radiall Group and its employees act in good faith in all their commercial and financial actions.

Acting with integrity means recognizing that our individual decisions can affect those who have not had the opportunity to be involved in decision making processes. That is why management, in particular the members of the OSC (Operational Steering Committee), undertake to behave in an exemplary manner in accordance with our values. The Company's leadership acknowledges that it is the primary guarantor of the autonomy and confidence that we pass on to our teams.

Acting with integrity requires individual behavior to be governed by honesty, respect for others and fairness. It is the responsibility of each employee to consider each situation and act in light of these principles.

Every person must act with integrity every day, which requires us:

- To be vigilant
- To train and be trained
- To comply with rules and standards
- To help and ask for help if necessary

Every person must strive to help others by:

- Being attentive
- Sharing
- Advising

Everyone has a duty to whistle-blow in the event of a risk to the Company or an individual by:

- Acting with courage
- Thinking of the harmful consequences of failing to draw attention to a risk



PRINCIPLES, RULES & RESPONSIBILITIES

Additional information has been provided to go into further detail in relation to certain principles. Please refer to Principles of Good Conduct on page 21.



REPRESENTING THE COMPANY

Radiall's reputation depends on each and every one of us.

PRINCIPLES, RULES & RESPONSIBILITIES

We perform our duties with respect and solidarity in relation to our colleagues.

HOW WE CONDUCT BUSINESS

REGULATORY COMPLIANCE

Compliance with applicable laws and regulations on our sites and in our professional activities is mandatory (corporate, tax, customs, exports, competition, the environment, etc.). On occasion, the content of this Charter is unable to correspond exactly to the laws of a given country. In this case, where the local legislation or custom impose higher standards than those in the Charter, the local legislation or custom shall always take precedence.

Any case of suspected fraud, counterfeit or unethical behavior which contravene the laws and regulations within the context of our professional activities must be reported.

Every one of us must be aware that violating laws and/or regulations may lead to civil and/or criminal sanctions, in both an individual and corporate capacity.

We are particularly committed to respecting human rights. We operate in many countries and are particularly vigilant on issues covered by the Fundamental Conventions of the International Labor Organization (prohibition of child labor and forced labor, respect of freedom of association, promotion of diversity, women's rights, respect for the rights of people to use their natural resources and the right to health).

We must implement regulatory provisions as soon as possible and comply under all circumstances with the regulatory provisions applicable in the countries in which employees work.

PRINCIPLES, RULES & RESPONSIBILITIES

Forced labor is prohibited. Child labor is prohibited under the legal age in force. All local labor law regulations must be observed. All employees and partners must be treated fairly and with respect and dignity. Cultural differences represent a strength for the Company and must be respected. All forms of harassment and intimidation are prohibited. Any form of discrimination is prohibited.

**PRINCIPLES, RULES
& RESPONSIBILITIES**

Radiall will not harm the reputation of its competitors either directly or implicitly. In its contact with competitors, Radiall and all its employees are prohibited from exchanging confidential information or information related to Radiall Group's intellectual, industrial or commercial property.

**PRINCIPLES, RULES
& RESPONSIBILITIES**

We seek to maintain healthy relationships with our suppliers and partners, based on the principles of impartiality, fairness and loyalty: we respect their independence and their identity.

Because we consider it essential to work in this way and because a supplier/partner can have an impact on the reputation of the Company, a Corporate and Ethics Charter is also provided to each of them. They must all agree to comply with it.

**PRINCIPLES, RULES
& RESPONSIBILITIES**

Gifts and entertainment can resemble or be perceived as acts of active or passive corruption, therefore it is advisable to take care in relation to gifts, marks of courtesy and hospitality (either received or given), and invitations to entertainment events that help build good relationships but may be considered as a means of influencing a decision or favoring a company or individual.

HOW WE CONDUCT BUSINESS**FAIR COMPETITION**

Competition legislation for companies such as our own set of specific rules. Noncompliance with these rules may result in severe legal, criminal and financial sanctions.

Price-fixing and market sharing arrangements are prohibited.

**SELECTION & FAIR TREATMENT OF
SUPPLIERS**

Radiall's relationships with its suppliers extend beyond the purchase and delivery of goods and services. They are essential to the long-term success of our Group. We value the quality of the relationships that we have with our suppliers.

GIFTS & INVITATIONS

Gifts are benefits of any kind given by someone as a sign of gratitude, without expecting anything in return.

The act of giving or being given meals, accommodations or entertainment (shows, concerts, sporting events, etc.) is considered as an invitation.

CONFLICTS OF INTEREST

A conflict of interest stems from any situation in which the personal interest of an employee is in conflict with their responsibilities at Radiall.

Radiall employees are expected to make properly informed choices and be completely loyal to the company. As such, any situation in which the personal interest, or that of relatives, conflicts with the interest of Radiall must be avoided.

In the performance of their professional activities, employees must act solely in Radiall's interests and refrain from gaining any personal advantage or interest whatsoever, either directly or indirectly, on their own behalf or on behalf of third parties.

Employees must avoid intentionally creating a conflict of interest and are prohibited from taking part in any assessment, meeting or decision relating to subjects in which they or their relations have a personal interest.

No hierarchical level at Radiall may validate a potential conflict of interest which concerns them.

**PRINCIPLES, RULES
& RESPONSIBILITIES**

If circumstances give rise to a potential or actual conflict of interest, the employees concerned must report it to their Line Manager or to the Site Director.

We behave with integrity under all circumstances.



**PRINCIPLES, RULES
& RESPONSIBILITIES**

Radiall ensures that its contracts and relationships with third parties and public administrations comply in full with the applicable regulations in the country concerned.

**CORRUPTION & FACILITATION
PAYMENTS**

Corruption involves giving or receiving an item of value (money, gifts, loans, services, etc.) with the aim of obtaining a benefit or influencing a decision.

Corruption is active when it is the person doing the corrupting who is behind the corruption.

Corruption is passive when the corrupt act is at the initiative of the person who is being corrupted, i.e. the person who commits or does not commit an act in exchange for consideration.

Trading in influence is a type of corruption. It refers to the act of a person monetizing their position or their influence, actual or supposed, to influence a decision that will be taken by a third party. It involves three parties: the beneficiary (who supplies the benefits or gifts), the intermediary (who uses the credibility they possess owing to their position) and the target individual who has the power to decide (public authority or administration, magistrate, expert, etc.).

All countries more specifically condemn the corruption of a public official on their soil. Corrupting a public official, meaning a civil servant or elected representative, involves promising or granting them a benefit of any kind whatsoever so that they take action or refrain from taking action as part of their duties.

Any dealings with a public official must comply with the applicable rules (i.e. the regulations applicable in the specific country of the public official or which was imposed on them by their employer). If it is not prohibited by law, any benefit granted to a public official must be completely transparent vis-à-vis the Company and subject to the prior approval of line management.

Facilitation payments are unofficial payments (as opposed to lawful and official duties and taxes) that are paid to facilitate or accelerate any (particularly administrative), formalities such as permit applications, visas and customs processing.

**PRINCIPLES, RULES
& RESPONSIBILITIES**

We must protect information from any disclosure to, and any tampering with by, third parties within the professional and personal environment, even following departure from the Company.

We uphold every confidentiality agreement between the Company and its partners.

Every one of us is responsible, in the performance of their duties, for the proper use and protection of the Company's tangible and intangible assets.

**PROTECTION OF COMPANY'S
ASSETS**

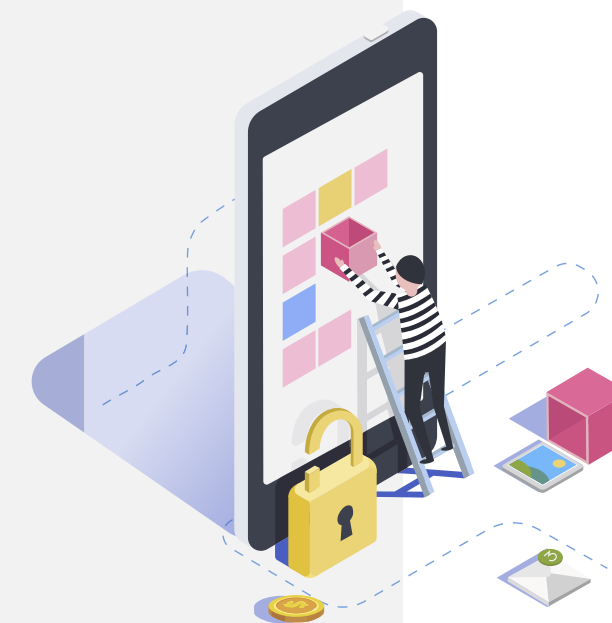
Whether it is the Company's material assets, sensitive data, intellectual property rights or simply its image, all have a value and help ensure our future business growth. The unauthorized disclosure of internal information can lead to a loss in value and cause damage to Radiall. We must all ensure internal information is protected.

**PROTECTION OF
INTELLECTUAL PROPERTY**

Because innovation and research are the keys to our success, Radiall Group's intellectual property rights represent crucial intangible assets that every person has a duty to protect and use wisely. These assets include all the patents, designs, brands, copyright and other knowledge belonging to our Company and which represent a competitive advantage.

**PRINCIPLES, RULES
& RESPONSIBILITIES**

We respect the copyright of Radiall and third parties by refraining from any action or practice likely to cause harm to Radiall or its customers, suppliers or partners.



PRINCIPLES, RULES & RESPONSIBILITIES

We comply with applicable regulations in relation to tax, customs, accounting entries and the publication of financial statements.

We undertake to prepare accurate and genuine financial statements.

FINANCIAL INTEGRITY

The fairness of our financial reporting is a guarantee of trust in relation to all our stakeholders. Radiall ensures full compliance with the regulations in force in each of the countries in which it operates.

The Company ensures that, in their auditing, its accounts departments and/or its internal and/or external auditors are alert to the concealment of acts of corruption in the ledgers, records and financial statements.

Internal and external fraud poses a risk of damage to the Company's activities and its image. It is generally characterized by an intentional act or omission. It involves the presentation of false, inaccurate or incomplete statements or documents, aimed at securing on unjustified grounds the payment, return or retention of funds.

PRINCIPLES, RULES & RESPONSIBILITIES

Requests for gifts, donations or contributions must be given careful consideration, particularly those from persons in a position to influence the company's activities or who could, should the gift be approved, gain a personal benefit from it.

Requests for donations to public interest organizations must be approved by the Site Director concerned.

Donations to political organizations fall within the remit of the Radiall Group.

GIFTS TO PUBLIC INTEREST OR POLITICAL ORGANIZATIONS

Gifts and donations are benefits given in the form of money and/or contributions in kind; they are allocated for a specific purpose: research, training, the environment (sustainable development), or for charitable or humanitarian purposes.

Political contributions, whether monetary or not, are intended to support political parties, leaders or initiatives.



PATRONAGE & SPONSORSHIP

Through patronage or sponsorship, the Company seeks to offer its financial or material support to a charity or a social, cultural or sporting initiative in order to communicate and promote its values.

Radiall encourages supporting local communities where the Company operates and authorizes reasonable donations to charitable organizations. In doing so, it is Radiall's intention to comply strictly with legislation.

The risk concerning donations is that some of them can easily be regarded as concealed illegal payments. To avoid this danger, Radiall exclusively finances non-profit organizations and foundations, and only participates in sponsorship programs whose activities are legally acceptable and consistent with the values and priorities outlined above.

PRINCIPLES, RULES & RESPONSIBILITIES

Donations must be made without seeking specific benefits from the recipient other than the promotion of the Company's image.

To safeguard any contribution made in Radiall's name, donations and sponsorship must be authorized in advance by the Site Director concerned.

HEALTH & SAFETY

The Health and Safety policy is a significant component of our business and is designed to complement Radiall's overall strategy.

Our comprehensive action plan defines the specific objectives we strive to achieve regarding the identification, assessment and reduction of short and long-term risks, the provision of appropriate training and tools to help reduce the number of work-related accidents and diseases, and anticipating and considering the human impact in relation to changes in working conditions.

PRINCIPLES, RULES & RESPONSIBILITIES

We ensure the safety of our own working environment.

We observe the safety rules issued for the entire Group and its sites.

We take action concerning any person who is in danger.

Setting an example is essential in the implementation of safety.

DIVERSITY

Our corporate culture, rooted in its history, emphasizes the human dimension of what we do. Diversity of talent strengthens our creativity and enables us to develop and market relevant products.

Radiall is a signatory of the "Business Diversity Charter" (www.charte-diversite.com), which underlines Radiall's commitment to diversity and equal opportunities. Radiall endeavors to be inclusive and nondiscriminatory.

Radiall works with several nonprofit organizations, schools and universities to promote equal opportunities, environmental awareness and closer links between industry and its local stakeholders.

PRINCIPLES, RULES & RESPONSIBILITIES

Radiall recognizes the cultural, religious and individual diversity of its customers and employees.

The Group is committed to eliminating all potential sources of discrimination.

Radiall applies an equality and diversity policy in relation to the integration of its employees and the employment opportunities offered to them.

**PRINCIPLES, RULES
& RESPONSIBILITIES**

Radiall does not tolerate any form of psychological or sexual harassment.

Everyone has the right to respect and to human dignity. This principle is fundamental to the way we work.

Any behavior or act that could violate this right is unacceptable.

**PSYCHOLOGICAL & SEXUAL
HARASSMENT**

Psychological and sexual harassment manifests itself through repeated and hostile behavior, words, acts or gestures which affect the employee's dignity or integrity.

Psychological or sexual harassment contravenes all legislation and Article 5 of the Universal Declaration on Human Rights.

**PRINCIPLES, RULES
& RESPONSIBILITIES**

We respect the confidentiality of the personal information of our colleagues and partners.

Radiall only collects and retains such data as is necessary for its activities.

**RESPECT FOR PRIVACY &
PERSONAL DATA**

The protection of personal data is intended to restrict access to information that could, either directly or indirectly, identify an individual and to set out the conditions under which this data can be collected and processed.

Radiall ensures that it complies with the European Parliament and Council Regulation (EU) 2016/679 of April 27, 2016 concerning the protection of private individuals in relation to the processing of personal data and the free movement of such data.

**PRINCIPLES, RULES
& RESPONSIBILITIES**

We comply with regulations and their subsequent amendments.

We favor technologies that protect the environment.

We monitor environmental indicators and manage our emissions.

We get our staff involved through awareness raising initiatives.

ENVIRONMENT

Radiall is committed to protecting the planet, and the health and well-being of its employees and customers. Consequently, not only does Radiall comply with local environmental laws and regulations, it also continually strives to improve its products and processes, in order to satisfy environmental regulations without compromising the quality of products sold.

Working closely with its customers and suppliers, Radiall meets environmental compliance requirements in both its products and its manufacturing processes.

WHISTLE-BLOWING SYSTEM

Every Radiall Group employee who is aware of a situation that is likely to violate the rules and values set out in this Charter is asked to report it, depending on the issue, to their Line Manager or the Human Resources department at their site or to the Ethics Committee based at Company headquarters in France by email to contact@radiallethics.com.

This system is also available to any employee needing help or advice relating to the content of this Charter and its implementation procedure, notably:

- If they are faced with fraud, counterfeit or corruption-related risk;
- If they believe in good faith that a violation of the Charter has been, is in the process of being, or is likely to be, committed;
- If they discover that someone is suffering from reprisals for having whistle-blown in good faith.

Reports will be treated in the strictest confidence and with the utmost consideration by the Ethics Committee which will investigate the facts covered by the report.

A whistle-blower guide sets out the system implemented and the procedure to be followed to make a report.

**SANCTIONS IN THE EVENT OF
MALICIOUS WHISTLE-BLOWING**

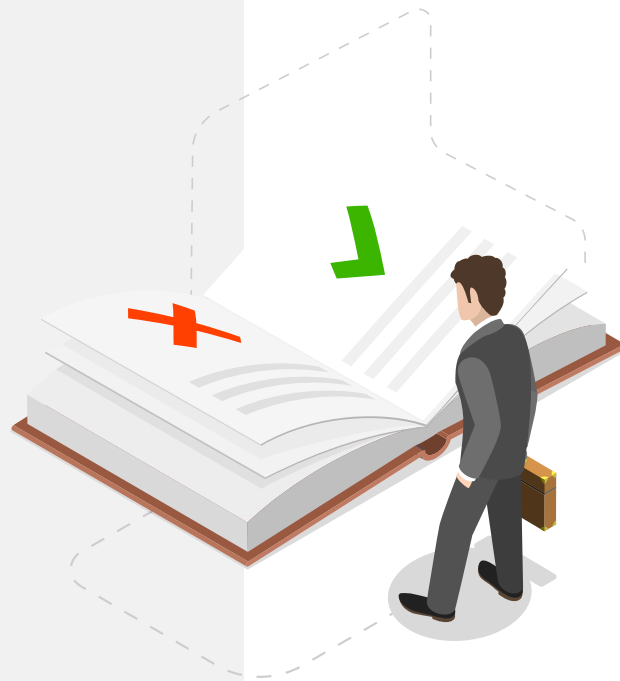
While an error made in good faith will not lead to any disciplinary measures, conversely, accusations that are deliberately unfair or marked by a desire to cause harm, are subject to sanctions, notably criminal, depending on the applicable legislation.

AWARENESS TRAINING

Employees are required to read this Charter and to take part, when asked, in training sessions that are organized by the Company in order to increase their awareness, particularly in relation to combating fraud and corruption. New employees receive such training upon their arrival.

OUR PRINCIPLES OF GOOD CONDUCT

Focus on behaviors to adopt and those to avoid.



REPRESENTING THE COMPANY

What To Do:

- Act with Radiall's best interests at heart.
- Reflect Radiall's ethical principles in our professional behavior and language.
- Ensure there is no confusion between our opinions or personal interests and those of the Company.
- Avoid denigrating colleagues and/or the workplace in any way whatsoever, particularly on social media.
- Always identify ourselves as Radiall employees when we use social media as part of our professional activities.
- Always keep in mind that nothing is "secret" or "private" on the Internet.

What Not To Do:

- Speak or write or make any commitment on behalf of Radiall unless duly authorized, in particular when contacted by journalists.
- Speak or write on subjects falling outside our personal expertise.
- Use Radiall's logo, letterhead or email address for personal business or to express personal views.

HOW TO CONDUCT BUSINESS

What To Do:

- Comply with the regulations that govern the commercial and competitive practices in all the countries in which we are located.
- Make our partners accountable to comply with regulations just as we are obliged to ourselves.
- Inform your Line Manager if you have accidentally received or used confidential or exclusive information concerning our competitors.

What Not To Do:

- Discuss or exchange sensitive commercial information with our competitors.
- Make arrangements with a competitor.
- Gather information about competitors by illegal means.
- Enter into an agreement with one or more competitors, suppliers or distributors notably in relation to price fixing or customer allocation.
- Abuse of a situation involving a dominant position impeding the maintenance of active competition.

SELECTION & FAIR TREATMENT OF SUPPLIERS

What To Do:

- Select suppliers on the basis of open competitive bidding.
- Ensure that all supplier bids are compared and considered fairly and without favoritism.
- Demonstrate transparency in the bidding process and give feedback, based on objective elements, to suppliers not selected who request it.
- Ensure that our ethical expectations are understood and respected by all suppliers in whichever country they operate.
- Help our suppliers to meet our expectations and requirements in line with our own values.
- Pay suppliers on time and according to the agreed terms, unless there are legitimate reasons for not doing so.
- Make sure that our suppliers are not overly economically dependent on Radiall.
- Protect the confidential information of our suppliers as though it were our own.
- Make our suppliers and partners aware of the importance of compliance with the rules of conduct via the *Supplier Ethics and Corporate Charter* created by our Group.
- Make our suppliers accountable to comply with regulations just as we are obliged to ourselves.
- Make sure with the competent bodies that no counterfeit complaint has been registered.

GIFTS & ENTERTAINMENT

What To Do:

- Refrain from accepting or offering gifts that could be regarded as bribes. The acceptable level of gift-giving is defined for each country and is available from your site management.
- Refrain from granting advantages or special favors.
- Politely refuse gifts, explaining Radiall's rules.
- Depending on the local Radiall policy in the country, inform your Line Manager of any gifts or invitations offered or accepted.

What Not To Do:

- Impose abusive conditions on suppliers notably in terms of payment or deadlines.
- Continue to work with a supplier who repeatedly falls short of our expectations or does not respect our ethical principles, notably in relation to human rights and/or the fight against corruption.

What Not To Do:

- Solicit gifts or invitations.
- Offer or accept gifts or provide a service that you would be unable to justify to your colleagues, family or the media.
- Accept cash payments, personal services, or loans.
- Accept gifts or invitations that would place you in a situation of obligation.
- Attend events or meals not attended by the business partner.
- Accept gifts or invitations within the context of making important decisions.

CONFLICTS OF INTEREST

What To Do:

- Act with professionalism, impartiality and a sense of competition in your relationships with subcontractors and suppliers.
- Apply purchasing and procurement procedures scrupulously.
- Obtain the prior written authorization of your Line Manager before entering into a transaction with Radiall in which a member of your family is an investor or holds a decision-making position.
- Obtain the permission of HR before hiring a spouse, child or other close relative. This type of recruitment must be based exclusively on objective criteria.
- Immediately inform your Line Manager of any situation in which your personal interests or those of a close relative could conflict with Radiall's interests.
- Inform your Line Manager of any professional external assignment or employment.
- Inform your Line Manager in the event of an actual or potential conflict of interest, which could influence, or be seen to influence, your judgment and actions.

PROTECTION OF INTELLECTUAL PROPERTY

What To Do:

- Ensure the Company's intellectual property rights are protected by refraining from discussing any research and development work or ongoing projects without first ensuring the existence of patent applications or other rights enabling Radiall to retain exclusive rights thereof.
- Maintain compliance with Group procedures for the recording of research and development data.
- Report any fraudulent or inappropriate use of which you become aware.
- Respect Radiall obligations in terms of non disclosure of Third Parties information.

What Not To Do:

- Allow your relationships with subcontractors or suppliers to influence the decisions you take for Radiall.
- Use your position at Radiall and any confidential information or knowledge to obtain a direct benefit connected with your self-interest.
- Participate directly in the recruitment, supervision or appointment to any position whatsoever of a member of your family.
- Accept any external assignment or work from a supplier, customer or competitor which could impact your results, independence or judgment in the performance of your professional duties.
- Accept payment from an organization or individual who has business dealings with or who is in conflict with Radiall.
- Use Radiall's name or image for reasons of self-interest.
- Conceal information relating to any conflict of interest.

What Not To Do:

- Use or install software not approved in advance by the IT Department or for which we do not have a license.
- Subscribe to free or paid online services without the approval of IT systems management.
- Leave any research and development work or information relating to Radiall's intellectual property unprotected.

PROTECTION OF COMPANY ASSETS

What To Do:

- Limit the disclosure of internal information or information from customers and suppliers, exclusively to those persons who have a legitimate need to know in Radiall's interests.
- Keep up-to-date with the Group's rules on information management.
- Ensure the safekeeping of all confidential information concerning Radiall, its customers and suppliers, both in paper and electronic format, seeking IT support where necessary.
- Check what it is permissible to disclose with your Line Manager before sharing any internal information with third parties outside Radiall.

CORRUPTION & FACILITATION PAYMENTS

What To Do:

- Refuse to pay or accept any "bribe" or any other personal benefit.
- Inform your Line Manager of any attempt at bribery, request for illegal payment or any other corrupt practice.
- Inform the Company's Ethics Committee via the Whistle-blowing system
- Accurately and honestly record all transactions made in Radiall's name in the company's financial statements.
- Help to ensure that the information included in the financial and business records, including in both financial and non-financial reporting, is always accurate. Ensure these records are kept safely and comply with rules for storage.
- Follow the internal verification procedures enabling us to ensure that we work with customers with legitimate activities and whose financial resources do not come from illegal activities.
- Cooperate with the internal and external auditors.
- If in doubt, seek the opinion of your Line Manager.

What Not To Do:

- Discuss or work with internal information indiscreetly in a public area where conversations can be overheard or data security compromised.
- Keep any internal information including any copies of originals upon leaving Radiall.
- Misappropriate the use of information and communication technologies (ICT) to cause harm to the system, IT network, company interests, individuals or customers.
- Disclose passwords.
- Use ICT tools for non-business purposes (see ICT Charter).

What Not To Do:

- Offer facilitation payments (bribes) or illegal payments for any reason whatsoever.
- Use involvement in charitable, public interest or sponsoring organizations to cover up corrupt acts or those involving self-interest.
- Offer, promise or give money as a facilitation payment, gift or invitation, with the aim of obtaining any benefit for Radiall.

FINANCIAL INTEGRITY

What To Do:

- Individuals who work on bookkeeping (accountants and management control) and accounting control tasks (audits, certification of financial statements), must take particular care concerning the accuracy and fairness of the financial statements.
- Communication with our shareholders must be transparent, regular and accurate.
- The accounting entries, financial statements and financial records of the Company and its various subsidiaries must accurately reflect the transactions concluded.
- Accounting entries must comply with applicable statutory requirements, accounting principles and Radiall's internal control processes.
- Any potential wrongdoing, either direct or indirect, to the detriment of the Company must be reported.

PATRONAGE & SPONSORSHIP

What To Do:

- Understand that any philanthropic initiative is a medium to long-term commitment.
- All actions, regardless of size, must only be undertaken with a clear plan of how the partnership will develop over time.
- Do not make any commitment on Radiall's behalf without having authorized it with the Site Director.

What Not To Do:

- Fail to comply with financial procedures.
- Fail to implement the necessary control procedures when risks to the integrity of financial statements, or of non-compliance with applicable fraud or anti-corruption regulations, are identified.
- Fail to take into account the recommendations of the Statutory Auditors' annual audits or any other audit.

What Not To Do:

- Involve the Company in personal charity or political activities, without authorization by the Site Director.
- Enlist Radiall in initiatives that do not reflect its ethical principles or the Group's philanthropy strategy.
- Oblige employees or business partners to donate gifts or funds to philanthropic projects supported by Radiall.

HEALTH & SAFETY

What To Do:

- Apply safety rules.
- Individually and collectively undertake to improve safety within the Company.
- Take care to properly identify safety hazards, promote awareness of them, and eliminate them.
- Report any safety risk.
- Do not enter zones for which you do not have the appropriate authorization.

DIVERSITY

What To Do:

- Support and promote Radiall's commitment to diversity, notably in its Human Resources and Purchasing policies.
- Ensure that our suppliers, customers and business partners are aware of Radiall's diversity policy.

ENVIRONMENT

What To Do:

- Consider how your behavior, in all aspects of your work, impacts the environment, in order to minimize it wherever possible.
- Contribute to Radiall's environmental initiatives.

What Not To Do:

- Ignore the Company's rules on health and safety at work.
- Carry out actions/acts which would result in risk to either ourselves or others.
- Be under the influence of alcohol or drugs in the workplace.

What Not To Do:

- Discriminate or harass on the basis of, in particular:
 - Gender
 - Disability
 - Marital status
 - Sexual orientation
 - Age
 - Political or philosophical opinions
 - Religious beliefs
 - Trade union activity
 - Ethic, social, cultural or national origin

What Not To Do:

- Ignore the Company's environmental protection rules.

PSYCHOLOGICAL & SEXUAL HARRASSMENT

What To Do:

- Support and promote Radiall's commitment to a workplace free from all forms of harassment.
- Be respectful of others; treat your fellow workers and business partners the way you would like them to treat you.
- If you experience or witness harassment or if you become aware of such behavior, inform Human Resources or the Ethics Committee.

PRIVACY & DATA PROTECTION

What To Do:

- Every person's freedom of thought must be respected.
- The right to individual freedom of association (union, political, etc.) must be respected.
- Regulations regarding the use of personal information must be respected by everyone.
- The Company does not disclose personal data to third parties, unless required to do so by applicable laws and regulations.
- Make sure that the persons for whom we collect personal data are aware that they can contact us in the event of any questions.
- Collect only the personal data that is necessary.
- Destroy or correct any inaccurate or incomplete data.
- Make sure that personal data is stored securely.
- Secure Human Resources approval regarding the transfer of personal data outside the country in which it was collected.
- Ensure that third parties to whom we could delegate the collection or use of personal data comply with these principles.

What Not To Do:

- Deliberately hurt, harass or set a person up to make a mistake.
- Continue any behavior that you have been told is inappropriate.

What Not To Do:

- Fail to respect the confidentiality of the private data of our colleagues and partners.
- Collect "sensitive" information without the consent of the person concerned or only if the law requires it.
- Communicate personal data to anyone outside Radiall unless legally required to do so.
- Hold personal information for longer than is necessary.



SIMPLIFICATION
is our INNOVATION