

FOREWORD

The identity and reputation of Neotiss are based on strong values of quality, innovation, integrity and transparency.

Ethics is an essential duty of each and every one. For this reason, this Ethics Charter applies to all Group employees in a broadly approach (including salaried and corporate officers), worldwide and at all levels of the Group, without exception.

This Ethics Charter does not however replace any existing policies (such as Rules of Procedure...), and our people should continue to refer to whatever rules and standards have been set in their workplace. This Charter aims at providing a framework for these policies and standards, so that it is easier to understand the rationale behind them.

Neotiss also seeks to share these principles with its business partners, in order for them all to go further than the strict respect of applicable laws and regulations.

FRAUD PREVENTION

➤ **PREVENTION OF CONFLICT OF INTEREST**

LINKS WITH A THIRD PARTY

A conflict of interest arises when a “personal interest” of any kind can influence the behavior of a person who, in carrying out his professional functions, has the power to make commitments in the name of a company of the Group. For instance, such personal interest may imply financial interest or may involve personal relation.

All employees who find themselves in such a situation must notify their superiors and determine with them the appropriate conduct.

PUBLIC ACTIVITIES OF EMPLOYEES

The citizen commitment of an employee who participates in public life is respected within the Neotiss’ professional framework.

However, the employee involved must never morally or financially commit the Group or one of its entities in the activities or responsibilities that he takes on as a citizen, including those for which he could be involved in a decision affecting the Group or one of its entities.

➤ **PREVENTION OF CORRUPTION**

RETRIBUTIONS

Practices that consist of offering or accepting undue retribution or granting undue advantages, directly or through third parties, to any person for the purpose of obtaining special treatment or influencing the outcome of negotiations involving the Group, are strictly forbidden.

GIFTS

Gifts can only be accepted and given if they have a symbolic cash value and are not paid in cash, in accordance with business practices and applicable laws and regulations.

➤ **FIGHT AGAINST BRIBERY, MONEY LAUNDERING AND TERRORISM FINANCING**

Neotiss does not participate in any way to illegal activities such as bribery, money laundering or terrorism financing.

Neotiss wants its people to ensure that all Group’s records, financial or otherwise, are accurate. This is an essential part of running our business legally, honestly and efficiently. Furthermore, in order to ensure that Neotiss’ activities are not used to launder money from criminal activities, all employees must:

- Maintain records securely and follow good practises on record retention
- Ensure that Neotiss is working with clients with legitimate activities
- Cooperate with Neotiss’ internal and external auditors

In no case shall Neotiss’ employees proceed with:

- Sell, transfer or dispose of any Group’s asset without proper authorization and documentation

- Accept cash transactions. If there is no other possibility, and only subject to the authorized legal amount (depending on applicable legislation), cash transactions must be expressly authorized, properly recorded and documented
- Conceal payments via the use of third parties

CONFLICT MINERALS

Neotiss is not an importer of gold, tin, tungsten or tantalum, and is therefore not directly subject to the mandatory rules of Regulation (EU) 2017/821. However, Neotiss promotes responsible sourcing and therefore requires its suppliers to inform it of the possible residual presence of "minerals from conflict zones" in the metals it orders. Should it be the case, Neotiss requires its suppliers to detail the origin of these minerals.

PROTECTION OF CONFIDENTIAL INFORMATION

The unauthorized disclosure of internal information can lead to a loss in value and be detrimental to the Group. Therefore Neotiss’ employees must ensure the protection of internal information, which implies among other precautions:

- to limit disclosure of internal information to people with a legitimate “need to know” that serves Neotiss’ interests
- to ensure the safe keeping of all confidential records, both paper and electronic
- before sharing internal information with third parties outside the Group (including namely members of family or when using social media), to check what is authorized to be communicated.

Neotiss and its employees protect the business partners’ confidential information as though it were Neotiss’.

RESPECT FOR PEOPLE

➤ **HEALTH AND SAFETY**

Beyond regulatory conformity, Neotiss wants to offer a safe and secure working environment and safety at work, which in practise depends on all its employees.

In order to implement such protection, health and safety Rules of Procedures have been established and must be applied within Neotiss premises. More generally, each employee must ensure that he/she is not putting someone at risk by his/her actions, and that he/she knows what to do if an emergency occurs at his/her workplace.

Neotiss has also worked at implementing prevention actions adapted to the specific features of Neotiss’ activities such as:

- awareness of the employees by dedicated campaign and punctual demonstrations;
- development of new, safer work methods;
- sharing of good practices.

➤ **ABOLITION OF CHILD LABOUR**

Use of child labour is strictly forbidden within the Group.

RESPECT FOR SUPPLIERS

Neotiss selects suppliers on the basis of open competitive process, which may include calls for tenders. In any case, all supplier offers are compared and considered fairly and without favouritism.

Neotiss make sure that its suppliers are not overly economically dependent on its business. Furthermore, Neotiss does not impose abusive conditions on suppliers.

Considering the high level of expectations from Neotiss and its own customers, Neotiss cannot continue to work with a supplier who is repeatedly failing to meet Neotiss’ expectations or who is not respecting Neotiss’ ethical principles.

RESPECT FOR THE ENVIRONMENT

Industrial activities always have an impact on the environment. It is everyone’s responsibility to seek to reduce that impact wherever possible.

In this purpose, Neotiss asks its employees to consider how their behaviour in all aspects of their work impact the environment, so that Neotiss is eventually able to reduce such impact (for instance, such contributions can take the form of cutting out unnecessary travel, saving water and energy and avoiding generating waste). Even small gestures can make a difference.

All spills or unusual emissions to the air or water shall be immediately reported to the relevant manager or to the Health and Safety Manager.

LET'S TALK ABOUT YOUR CONCERN

Neotiss encourages a culture of openness where employees can raise their genuine concerns. Neotiss encourage all employees to express their views, defend their opinions and point out unacceptable behaviours and demands. Employees may also have concerns about certain practices and need advice and guidance to help resolve them.

The normal route for raising such issues is via operational or functional management. Employees can also contact their Human Resources Manager.

All information communicated will be shared only with those persons who have a legitimate reason to know either to ensure the concern is handled and/or the appropriate steps are taken.

Neotiss encourages its managers to put their team at ease by regularly telling them that they are available to listen to their concerns and reminding them that an employee who, in good faith, shares his or her concerns shall not be subject to retaliation. Managers should regularly find time to discuss ethical issues with their team and to share managers' experience so that their team can benefit from their knowledge and follow their example.