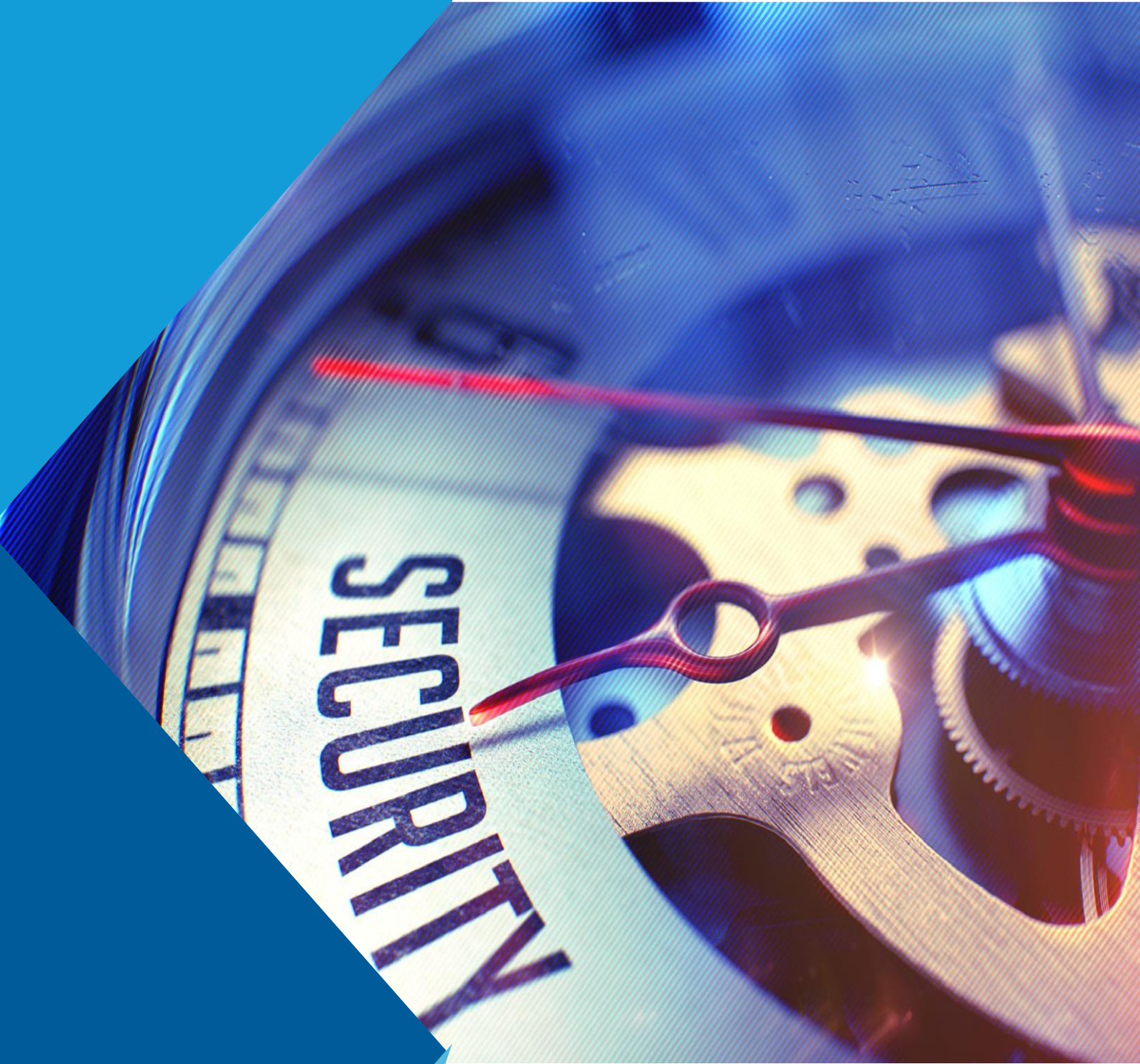




# GEOS



## CODE OF CONDUCT

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# PREAMBLE

As a private security, industrial services and technical assistance company, the GEOS Group responsibly provides services including safety, security and defense in complex environments. The GEOS Group wishes to conduct its actions around fundamental principles which constitute its ethics, shared unconditionally by all of the Group's employees.

The GEOS Group is identified by the French authorities as well as those of the countries where it carries out its expertise and assistance activities. The GEOS Group attaches particular importance to compliance with legislation and the transparency of its structures and activities.

The principles set out in this charter apply both to GEOS' own activities and to those of its subcontractors, who are contractually bound to respect the precepts laid down in this charter.

## ARTICLE 1: COMMITMENT TO PRINCIPLES

The GEOS Group fully endorses the principles of the United Nations Global Compact on Human Rights, Labor Rights and Environmental Protection, and supports the work of the Global Compact Office.

The GEOS Group is committed to respecting the 1948 Universal Declaration of Human Rights and the Rio and Johannesburg Conferences on the Environment.

The GEOS Group is a member of ICoCA (International Code of Conduct Association) and on November 9, 2010 signed the International Code of Conduct for Private Security Providers (ICoC), in which it undertakes *“to provide security services in a responsible manner that respects the rule of law and the human rights of all people, and protects the interests of its customers”*.

The GEOS Group ensures compliance with these texts and principles by all those acting on its behalf: employees, suppliers and service providers.

## ARTICLE 2: RESPECT FOR BUSINESS ETHICS

Strict compliance with the law on corruption, competition and embargoes is essential.

To this end, the GEOS Group has adopted a “zero tolerance” approach to active and passive corruption and influence peddling.

Managers, employees or partners must not, directly or indirectly, offer, promise, grant or authorize the delivery of a sum of money or any other value in order to obtain an undue advantage in the performance of their duties.

Similarly, GEOS Group entities in contact with public authorities comply with reporting and ethical obligations, and regularly monitor and formalize commitments made to public decision-makers.

## ARTICLE 3: COMPLIANCE WITH LAWS

Given the specific nature of its activities, the GEOS Group reserves the right to refuse any assignment that does not comply with its ethics and the laws in force in France and in the countries of the assignment concerned.

The GEOS Group and its employees comply with all laws and regulations in force in the countries in which they operate, in particular national security regulations for the activities concerned. All employees must refrain from actions and behavior that could lead themselves, other employees, their company, the Group or its customers into unlawful practices.

Similarly, we must be particularly vigilant when it comes to rules governing labor and employment, health and safety, and environmental protection.

Above and beyond laws and regulations, the GEOS Group takes care to respect the cultures and customs of the countries in which it operates.

## ARTICLE 4: RESPECT FOR PEOPLE

The excellence of the GEOS Group depends on the excellence of its employees. The individual development of each employee is a prerequisite for the Group's collective success.

The GEOS Group undertakes not to discriminate on any unlawful grounds, for any reason whatsoever, in hiring or in employment relations.

Attaching particular importance to recruitment, the GEOS Group prohibits itself and all its employees from discriminating on the basis of race, skin color, gender, religion, social origin, social status, ethnicity, disability or sexual orientation.

The GEOS Group recruits on the basis of each candidate's initial and professional training, know-how and experience, and on the intrinsic requirements of the assignments to be carried out.

Any pressure, pursuit or harassment of a moral or sexual nature is prohibited.

The GEOS Group is committed on a daily basis to ensuring and reinforcing the safety of its employees in the exercise of their missions and activities.

The GEOS Group complies with the laws governing employee privacy, particularly with regard to computer files, and has put in place appropriate measures. The Group ensures that the General Data Protection Regulation is properly applied within its departments, and applies the recommendations of the French Data Protection Authority (CNIL) wherever possible. GEOS also ensures that its employees have the right to disconnect from work.

GEOS also expresses its firm commitment to the protection of human rights, and in particular to the European Convention on Human Rights and the Universal Declaration of Human Rights. Our company undertakes to comply with international law prohibiting torture, to guarantee a working environment free from cruel, inhuman or degrading practices, and to punish any employee who contravenes this prohibition.

GEOS formally condemns any involvement in human trafficking. GEOS undertakes not to resort to human trafficking for the purposes of sexual exploitation, forced labor, servitude or



any other similar act. We condemn all forms of modern slavery and undertake to cooperate in good faith with the competent authorities to prevent and combat such practices.

## ARTICLE 5: RESPECT FOR CUSTOMERS

The GEOS Group is committed to building lasting relationships based on trust and mutual respect.

The GEOS Group's relations with its customers, because they can take place under exceptional conditions, are part of a partnership based on trust, characterized by sincere and loyal information and respect for the commitments made by the Group to its customers.

The GEOS Group undertakes to carry out only those assignments or services for which it has the necessary expertise and resources to provide the best possible level of security for the people, valuables and property to be protected.

In the course of its activities, the GEOS Group may collect or process sensitive or confidential information concerning the partner company. The utmost discretion is an essential rule for GEOS Group employees. It is the responsibility of each employee to observe professional discretion and not to divulge, inside or outside the GEOS Group, any confidential information that he or she holds by virtue of his or her duties.

The GEOS Group and its employees will take care never to damage the reputation of their partners through their actions and initiatives.

## ARTICLE 6: RESPECT FOR THE ENVIRONMENT

The GEOS Group is well aware that we live in a world that will face ecological challenges for present and future generations. That's why the GEOS Group is voluntarily committed to reducing its environmental impact.

Controlling water and energy consumption, waste management and indoor air quality are common concerns for all GEOS Group employees.

Each employee strives to maintain a safe working environment, protecting health and minimizing the impact of his or her activity on the environment.

## ARTICLE 7: COMMUNICATION

The present Code of Ethics is distributed to all employees in the most appropriate way, as defined by each entity, and is accessible on the GEOS Group website and on its staff website.

All GEOS Group managers, employees and subcontractors receive information on the principles and commitments of this Charter and on the Group's personal data protection policy as part of their induction process.

## ARTICLE 8: REPORT

As part of a continuous improvement process for its ethics policy, the GEOS Group undertakes to deal with any report drawn up by one of its employees, or by a third party, concerning a breach of the principles set out in this Ethics Charter and in the International Code of Conduct, as well as any breach on its part or on that of one of its subsidiaries.

The GEOS Group makes available to all Group employees a system for collecting alerts, enabling them to report any doubts or concerns regarding the application of the law or the standards of the Ethics Charter, confidentially and without fear of reprisal.

The facts reported must concern one of the following cases:

- A breach of the rules of the present Code of Ethics;
- A crime or misdemeanor;
- A serious and manifest violation of an international commitment, a unilateral act of an international organization, a law or regulation;
- A threat or serious prejudice to the general interest.

In accordance with the professional whistle-blowing procedure, a whistle-blowing report may be made to either the employee's line manager or to the ADIT-appointed whistle-blower at the following e-mail address: [adit@alertethic.com](mailto:adit@alertethic.com).

In addition, no retaliatory measures (disciplinary sanctions, dismissal, discriminatory measures) will be tolerated against an employee who has reported a situation or behavior prohibited by this Charter.

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