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# Code of Ethics & associated policies

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## Our commitment



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*Our company has been committed to responsible development for over 15 years, and our ambition is to grow along with all of our stakeholders.*

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This collective objective requires being united around values, rules and practices which help everyone make the right decisions and behave appropriately in their daily lives.

Our values of attentiveness, respect and boldness provide a strong foundation and a commitment for all Onet teams. They sum up how we approach internal and external relationships and can be found in collective as well as individual actions. Respect for one another is a fundamental prerequisite for the smooth operation of the team and we need to promote diversity in both profiles and skills. Everyone must contribute to creating favourable conditions to enable everyone to work effectively, express their talent and showcase their skills.

The code of ethics is a guide for all Onet employees, and everyone in their respective roles undertakes to respect its principles, disseminate them to their teams and monitor their application. Since this code cannot be exhaustive, it is updated as required to take into account societal developments or new situations for our company.

The action principles contained in our code of ethics refer to situations relating to the following themes:



Respect for human rights and fundamental freedoms.



Integrity and fairness of commercial practices.



Respect for the environment and protection of the planet.

The elements set out in the code of ethics therefore complement all of the regulatory texts and laws applicable in the countries in which we operate. The international texts we are committed to applying in this respect include:



The principles of the Universal Declaration of Human Rights.



The fundamental conventions of the International Labour Organization.



The OECD Guidelines for Multinational Enterprises.



The principles of the United Nations Global Compact.

We are committed to applying stricter regulations in certain countries, however, the rules of our code of ethics cannot be called into question if a local law is less restrictive for our Group.

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Émilie de Lombarès

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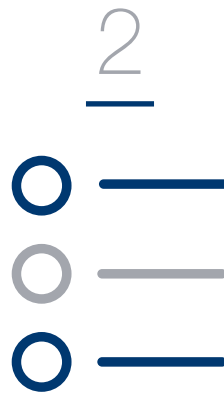
Elisabeth Coquet-Reinier

Chair of the Onet SA Board of Directors

Chair of Reinier Holding

Chair of the Onet SA Supervisory Board

Chair of the Responsible Development Steering Committee

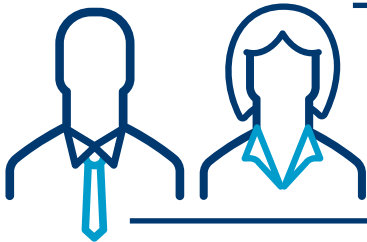


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**Scope of application**



**Compliance with these principles is imperative within Onet** and this code is consequently applicable to Onet SA and to all French and foreign subsidiaries.



*Every Onet employee, both individually and collectively, must adhere to these commitments and be responsible for their promotion internally and externally.*



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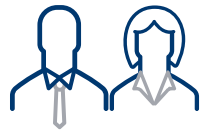
## Our principles



### 3.1 Respect for human rights and fundamental freedoms

The major challenge facing our services and engineering company is to protect and develop its employees, while contributing to preserving the ecosystem in which it operates.

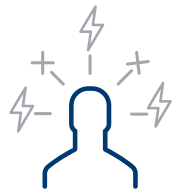
Each Onet employee therefore undertakes to:



Respect the dignity and moral integrity of others.



Establish conditions favourable to listening to and respecting individuals, to ensure the proper functioning of the teams.



Prohibit all forms of harassment or physical violence.



Respect the principle of non-discrimination and ensure employees are treated fairly from the time they are recruited and throughout their career.



Prohibit all forms of illegal work (undeclared labour and forced labour).



Preserve the confidentiality of information and personal data concerning any person linked to Onet.



Ensure that employees' work is carried out under optimal safety conditions.



Prohibit any proselytizing on religious, political or philosophical grounds.

*These principles are supplemented and/or illustrated, if necessary, by the resource documents available to management in a dedicated space on the intranet portal, in order to implement these principles within the teams.*





### 3.2 Integrity and fairness of commercial practices

Onet considers the implementation of its business lines to be an element of added value in the success of its clients. Listening to and respecting the client are long-standing, fundamental principles within the company's culture. To guarantee its clients a quality chain, Onet expects its own partners to behave in accordance with the rules of conduct it abides by itself.

Each Onet employee therefore undertakes to:



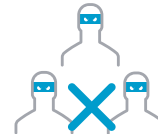
Guarantee the level of compliance and service or engineering quality defined contractually with our clients.



Prohibit any unfair or anti-competitive practices.



Refuse any discriminatory order or injunction from our clients and prohibit any discriminatory act against our suppliers.



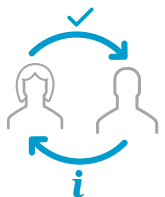
Prohibit all forms of corruption, influence-peddling or conflict of interest.



Establish responsible purchasing practices that favour suppliers that undertake to respect the Group's ethical principles.



Prohibit any direct harm or damage to the property of the Group or its business partners.



Guarantee the veracity of the information required for each person to fulfil their duties as well as its proper dissemination.



Prohibit any use of Onet's tangible or intangible assets for personal purposes or for those of a friend or family member.

*These principles are supplemented and/or illustrated, if necessary, by the resource documents available to management in a dedicated space on the intranet portal, in order to implement these principles within the teams.*



### 3.3 Respect for the environment and protection of the planet

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We are well aware of our individual and collective responsibility to protect the planet and consider that each of our decisions must be made with consideration of the short- and medium-term impacts on our ecosystem.

Each Onet employee therefore undertakes to:



Prioritise, both collectively and individually, any technique, method or equipment that minimises the use of natural resources and promotes respect for biodiversity.



Favour the circular economy in the production of goods and services, i.e. take the approach that any material used should remain a resource rather than become waste.



Develop activities that contribute to the use of low-carbon energy and the protection of natural heritage.

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*These principles are supplemented and/or illustrated, if necessary, by the resource documents available to management in a dedicated space on the intranet portal, in order to implement these principles within the teams.*



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## Our code of conduct monitoring system



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*Onet has put a complete system in place to evaluate the monitoring of our principles and respond more effectively to ethical issues.*

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### 4.1 MONITORING OF INDICATORS

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The monitoring of these principles is based in particular on the reporting of performance and control indicators, which are already in place for many processes. These indicators are then shared and analysed in the various specific committees and may give rise to specific action plans.

### 4.2 INTERNAL AUDITS

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The responsibilities of the Audit and Risk Management Department's internal audit team include ensuring compliance with the principles set out above. It reports to the Chair of the Board of Directors, guaranteeing it complete independence in the exercise of its responsibilities.

These responsibilities are included in an annual audit plan, although the internal audit team may also be specifically mandated by the ethics committee.

### 4.3 THE ETHICS COMMITTEE

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The Onet Ethics Committee is a specific governance support body which centralises matters relating to professional ethics within Onet, and has an advisory, information and control role. It handles complex situations requiring investigations or arbitration when the context prevents the line management from reaching a decision.

The committee operates on two levels:

- › Questions can be referred to it by the Board of Directors or it can refer questions to itself on general ethical issues (related to organisation, processes, etc.)
- › It is responsible for the handling process of cases reported via the digital ethical communications platform [onet.whisppli.com/speak-up](https://onet.whisppli.com/speak-up) (questions, alerts, etc.)

This committee's responsibilities, scope and operating rules are available on the intranet portal.

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**How to report a critical situation  
or problem concerning ethics**

