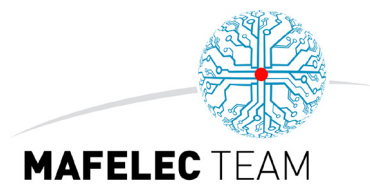




Social & ethical charter



CREATING CONTROL AND SIGNALLING SOLUTIONS
FOR HARSH ENVIRONMENTS

PREAMBLE

The **MAFELEC TEAM** offers the solutions best suited to the needs of our Partners in the field of creating control and signalling, switching and protection solutions for harsh environments. Our ambition is to position ourselves as a world leader and specialist thanks to our specific skills. Our teams rely on a continuous improvement process that places our human capital at the heart of our priorities. This dynamic is built around the P.C.R. principles: Performance, Communication, Rigour. **MAFELEC TEAM** provides all employees of its parent company, subsidiaries and Partners with a Social and Ethics Charter, a symbol of the values and rights that underpin our identity and cohesion. This Charter is an ambitious program of actions that touches on social dialogue, respect for the environment and the principles of sustainable development, and ethical requirements.

This Ethics Charter is part of the «Corporate Policy».

This Ethics Charter is communicated in any useful form to all **MAFELEC TEAM** employees. It is also communicated to our Partners when the commercial relationship is set up and remains available on our websites.

In the event of any question concerning its interpretation or application, the **MAFELEC TEAM** Legal Department undertakes to take the request into account in order to provide an answer as soon as possible.

I/ BUSINESS ETHICS

A. COMPLIANCE WITH THE STANDARDS

Today more than ever, legal rules structure the business world. It is mandatory for all of us to comply with these laws and regulations, applicable nationally or internationally. Whether you are an employee or partner of our group, your professional conduct must be exemplary. We ask you to ensure that the legislation in force in your country and in the world is respected. You must prohibit any activity or behaviour that is illegal or may directly or indirectly damage the image of **MAFELEC TEAM**.

If a third party asks you to perform an illegal act, it is your responsibility to refuse to execute this request and to refer it to your manager or, if applicable, to any competent person.

It is necessary to prevent conflict of interest situations.

Direct or indirect personal interests are not taken into account, for example when choosing a supplier.

B. FAIR AND HONEST COMPETITION

Respect for the free play of competition

> The development of **MAFELEC TEAM** should enable us to position ourselves as a world reference. We firmly believe we can achieve this result thanks to the quality of our products, our know-how and our skills. This leadership position will be achieved thanks to the merit of our teams. No agreement with our competitors is possible in order not to distort the free market. Similarly, we will never abuse a dominant position. Any activity that could lead to unfair competition should be refused.

Refusal of corruption

> We impose the strict respect of honesty in the practice of business. It is strictly forbidden to accept any form of corruption even if it results in the loss of a contract. The International Chamber of Commerce in the text entitled «Corporate responsibility and anti-corruption» defines corruption as «the offer, promise, granting, authorization

or acceptance of any pecuniary or other advantage... in order to obtain or retain a commercial or other undue advantage». We refrain from being corrupt and corrupt our customers or suppliers. Obviously, we ask our Partners to refrain from corrupting the group's employees and from being corrupted.

Respect of the Confidentiality of information

> Sensitive information is exchanged in order to provide services that meet our customers' requirements. Such information should be protected. Ensuring their confidentiality is a priority for all of us, whether we are employees, suppliers or customers.

> An employee or a Partner is prohibited from disclosing information obtained within **MAFELEC TEAM** whether this information is in the professional or personal domain. Conversely, **MAFELEC TEAM** teams do not disclose any personal information of the employee or Partner to which they have access as part of the working relationship in compliance with the obligations imposed by the CNIL and the General Data Protection Regulation since June 2018.

II/ RESPECT FOR FUNDAMENTAL RIGHTS

MAFELEC TEAM companies adhere to the principles and fundamental rights of the Universal Declaration of Human Rights (1948) and the Charter of Fundamental Rights of the European Union (2000). These are all indivisible and universal values of human dignity, freedom, equality and solidarity.

A. A HUMAN COMMITMENT

The first wealth of our society is its human capital. Everyone's well-being is fundamental to the overall modernization and development project and we are committed to transparent communication in order to evolve in an environment that respects human rights.

To this end, we undertake to:

- Combat child labour and exploitation and forced labour in general,
- Promote access to work for people with disabilities,
- At a minimum, to respect the social, community and national legislation and collective agreements of each country,
- To respect the exercise of the right to organize in each of the countries concerned.

The **safety and health** of the people present on our sites, whether that of our employees or of our customers or visitors, is one of the most important concerns. Rules are established to guarantee the safety of people. It is everyone's responsibility to respect them and ensure that they are respected. A healthy and safe environment is in place to ensure a peaceful working environment. This means the outright punishment of any form of moral or sexual harassment and physical or psychological violence.

We are committed to protecting everyone in the company from any form of **discrimination** in the recruitment process, or during the contractual relationship with the employee or Partner. Discrimination is defined in particular in Protocol 12 which extends Article 14 of the Convention for the Protection of Human Rights and Fundamental Freedoms as *«the enjoyment of any right provided for by law shall be secured without discrimination of any kind, in particular on grounds of sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status»*.

MAFELEC TEAM is committed to ensuring gender equality. This includes the implementation of equal pay policies within the framework of company agreements negotiated annually that include this theme.

Employment, wages, time and working conditions:

Each **MAFELECTEAM** company is committed to promoting the employability of its employees within the framework of anticipatory management of economic, technological and organizational developments, guarantees of security and job stability.

In this context, employee training is a permanent and priority investment.

Wages and benefits shall be at least at the level of the legal and conventional standards or individual or collective agreements of the country concerned.

Working time and conditions are in accordance with the legislation and individual and collective agreements in force in each country concerned.

Social dialogue:

MAFELEC TEAM companies are committed to fostering the development of responsible social dialogue and a relationship of trust at all levels.

B. INVESTMENT FOR THE ENVIRONMENT

MAFELEC TEAM is committed to protecting the environment. We must integrate this component into our process through pollution prevention, by applying it on a daily basis through better control and recovery of our waste and reduction of our energy consumption, in compliance with all requirements. Most of our customers are also involved in environmental protection. We create products for them that are less heavy and consume less energy.

Everyone can act to protect the environment on their own scale through everyday actions.

MAFELEC TEAM Management and all our employees are committed to becoming the witness and the actor of this Charter and to ensuring that it is respected with all the necessary rigour that our teams demonstrate every day. All the provisions of the present Charter shall be understood to be in accordance with the national provisions and legislation specific to each country.

Dissemination of the Charter:

Each company ensures that each of its employees can read this Charter, at the time it comes into force, through the appropriate channels (HR, Communication, etc.).

The Charter remains available according to the practices of each company.

It is broadcast in French and English.

Application of the Charter:

The management of each **MAFELEC TEAM** company monitors the application of this Social and Ethical Charter and its application.

At an annual meeting of the Management bodies, a summary of the alerts issued and their follow-up will be made.

Entry into force:

The Charter will enter into force on 10/07/2018 in all MAFELEC Group companies after having been signed by the President of **MAFELEC TEAM**.

This Charter is concluded for an indefinite period and is deposited with the competent authorities, after consulting the works council, HSE and Union delegates, in accordance with the requirements of French law governing this text.

Gilles HEINRICH
Président / CEO

Addition to the Social and Ethical charter

Product Safety

Comtronic and its employees agree to comply with the Equipment and Product Safety Act. Every Comtronic employee must be aware that his work and care have a direct impact on product safety. Each employee is obliged to adhere to the prescribed procedures and processes in the interests of product safety. Disruptions and deviations must be reported to the supervisor immediately. Suitable measures to remedy the faults and deviations must be promptly and promptly initiated. The ultimate goal of Comtronic is to produce and circulate faultless products in compliance with legal requirements and while maintaining occupational safety, protecting resources and the environment.

Entre into force:

This Addition comes into force on 30.07.2019 for the employees of Comtronic GmbH, after it has been signed by the managing director of Comtronic GmbH.



Christian Renz
Geschäftsführer

