

## **Group's ethics general policy**

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# John Cockerill Group's ethics policy

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## **Summary**

<b>Ethics within the John Cockerill Group.....</b>	<b>3</b>
Ethics benefiting sustainability .....	3
Individual and team commitment.....	3
Acts contrary to ethics .....	4
Ethics management .....	4
Follow the guide.....	4
<b>In practice at all levels .....</b>	<b>5</b>
In the Group.....	5
<i>For individual well-being.....</i>	<i>5</i>
<i>In a concern for the common interest .....</i>	<i>5</i>
<i>With regard to financial partners.....</i>	<i>6</i>
On the Market .....	6
<i>With regard to clients.....</i>	<i>6</i>
<i>With regard to suppliers .....</i>	<i>6</i>
<i>With regard to competitors .....</i>	<i>7</i>
In Society .....	7
<i>For the community .....</i>	<i>7</i>
<i>For the planet.....</i>	<i>8</i>
<b>How to resolve an ethical problem? .....</b>	<b>9</b>
Get informed .....	9
Talk about IT!.....	9
Ethics e-mail: a specific instrument .....	9
<b>Ethics in practice .....</b>	<b>10</b>
Fraud and corruption.....	10
Competition.....	11
Gifts, invitations and trips .....	11
Conflict of interest .....	11
Sales representations .....	12
Sponsoring, patronage and partnerships.....	12
Communication .....	12
Traceability and truthfulness of documents .....	13
Delegation of power .....	13
Protection of company assets .....	14
Intellectual Property .....	14
Environment, health and safety .....	14
Purchasing and suppliers .....	14



# ETHICS WITHIN THE JOHN COCKERILL GROUP

## ETHICS BENEFITING SUSTAINABILITY

John Cockerill wishes to generate sustainable industrial progress which benefits at once its clients, its personnel, its shareholders, the communities in which it operates and the planet. This desire forms the very foundation of all decisions based on a number of fundamentals which translate its commitment:

- Offering quality jobs
- Strengthening governance and promoting responsible behavior
- Meeting the needs of our time: preserving natural resources, producing sustainably, contributing to greener mobility, fighting against insecurity, facilitating access to renewable energy
- Reducing its own environmental footprint and that of client industries
- Supporting the local development of communities in which we are located
- Guaranteeing the long-term evolution and viability of the Group

### **What should we understand by 'Ethics'?**

Ethics refers to a philosophical discipline both practical and normative whose objective is to indicate **how human beings should behave**, act and live, between themselves and with regard to those around them. Within the company, working ethically consists of respecting a certain number of established and shared criteria which impact on the **professional behavior** of all coworkers.

### **Ethics and compliance, two complementary approaches**

Ethics is regularly considered alongside a complementary notion, that of compliance. Compliance relates to a number of actions and measures that need to be implemented in view of meeting with the procedures. Meanwhile ethics focuses primarily on behaviors.

## INDIVIDUAL AND TEAM COMMITMENT

Ethics lays the foundations and Women and Men are the actors, both individually and collectively.

Individually, everyone has to place ethics at the heart of his individual behavior, in exercising his profession and in business relations, and with regard to all of those with whom he comes into contact. Everyone has to make sure he acts with common sense and discernment, and to discuss ethical questions and dilemmas inherent to the exercise of all professional activities, with both colleagues and superiors. It is thus up to each individual to assume his or her professional responsibilities after having defined and assessed them with his or her hierarchy.

Collectively, each manager has to share the ethical principles of John Cockerill with his contacts, internally and externally. He is responsible for the deployment and application of the ethical policy in the operational and functional organisational modes of the entities of the Group. He is therefore responsible not only for informing his colleague and third parties in concrete and practical terms of the rules to be observed, but also for ensuring they are understood. He also has to advise and encourage them to share their ethical concerns and of questions involving the application of the rules. He should



not hesitate in indicating to his superiors or to the John Cockerill Ethics Committee any difficulties he may encounter in applying this policy. It is also up to him to verify that his colleagues and third parties are conforming to the rules they have to apply. But it is firstly by the example of his own behavior that the manager can transmit the ethical message and a sense of compliance to the people he works with.

## **ACTS CONTRARY TO ETHICS**

Everyone, whatever his function, is responsible for his own behavior and assumes the consequences of his choices. If he does something which goes against ethics, he is liable, according to individual cases, to:

- Internal disciplinary sanctions as set down in the 'internal regulations' of the entity to which he is attached
- Administrative, civil or penal sanctions according to the external laws and regulations of the country in which he is employed
- And, by default, to sanctions decided by the Group Ethics Committee

Acting contrary to ethics is accountable both to the person carrying it out and the person ordering it. If someone believes he is under pressure to act contrary to the principals and interests of John Cockerill or against his conscience, he is invited to talk about this to a reference person (cf. chapter 3).

## **ETHICS MANAGEMENT**

Managing ethics within John Cockerill is the responsibility of a Group Ethics Committee made up of members selected and recognised for their integrity and their expertise within the Group.

This Committee gathers at least 5 members:

- A president, member of the Comex or the Board
- A professional ethics manager in charge of the daily management of ethics questions and of the secretariat of the Committee
- An operations representative
- A corporate representative
- A member of the Board

The Ethics Committee meets at least once every two months and on an ad hoc basis when necessary according to arbitration needs. It regularly reports to the Audit Committee and oversees the correct evaluation of ethical practices within the Group. It ensures that policies involved are kept up to date, in collaboration with the owners of the processes involved.

## **FOLLOW THE GUIDE**

The objective of this policy is to detail the principal manners in which ethics are applied within the John Cockerill Group. It does not set out to cover every hypothesis which may be encountered because ethics is an evolving domain, but it does provide a general framework for the application of a **living ethics policy**. Documents dealing with ethics are regularly updated in order to integrate best practices in a continuous improvement approach.

All Group's documents relative to ethics are accessible via the Group intranet. This document is addressed to directors of the companies within the John Cockerill Group and to salaried personnel (permanent or temporary) of the entities of the Group, as well as to any person from a third party company who is attached to an entity of the Group.



# IN PRACTICE AT ALL LEVELS

The ethics policy sets out the general principals which everyone has to apply in their professional activities and behavior: within the Group, on the Market and in Society.

## IN THE GROUP

*For individual well-being*

At all levels, John Cockerill is committed to maintaining demanding and harmonious human relations between colleagues, who have the benefit of quality employment. Within this context:

- It is the responsibility of each of us to enable all colleagues to carry out their jobs under **good physical and moral conditions**. Thus, in the exercise of responsibilities and in hierarchical relations, **the person must always be respected**.
- The Group encourages relations between colleagues founded on **courtesy, consideration, recognition** and **discretion**. John Cockerill condemns all forms of harassment.
- The Group is committed to putting into operation all suitable means for the **preservation of the health and safety** of its staff members at work.
- Criteria selected for **recruiting personnel** are above all based on skills, human qualities, and experience, regardless of criteria such as privacy, gender, nationality, or religion.
- A particularly valuable factor, **team spirit** is based on open and constructive dialogue which strengthens cohesion. The Group does all in its power to inform the personnel about its objectives and its challenges in order to make it easier for them to participate in company life.
- John Cockerill Group wishes to be an **employer of reference** which respects the legislation and social fabric of the countries in which it is located.
- John Cockerill takes care to create a **motivating environment** which stimulates performance and leads to fulfilment within its personnel: attractive places of work, permanent attention paid to skills development, methods for dialogue and mobilisation around stakes and challenges...

### Respect for others involves...

- Permanent evaluation of the impact of one's actions and decisions on other people, in order that they are not harmed, either in their integrity or their dignity.
- Refusing any type of discrimination in act or word, particularly with regard to age, sex, ethnic, social or cultural origins, religion, political or union opinions, personal life-style choices, physical attributes or handicaps.

*In a concern for the common interest*

John Cockerill wishes relations within its entities to operate in **transparency** and **equilibrium**:

- The entities of the Group are required to transmit information which is **accurate and truthful**. When entities of John Cockerill have business relations between themselves, they will ensure



that these are carried out with the same degree of loyalty as is shown to clients, suppliers or exterior partners.

- Entities working within a regulated context must take care to **respect required procedures**, particularly where commercially sensitive information is concerned.

#### *With regard to financial partners*

The development of John Cockerill in particular depends upon its ability to find the capital necessary for its investments. With this goal in mind:

- The Group applies **high level management standards** with the particular objective of ensuring to our financial partners the growth and optimal repayment of invested capital.
- The Group makes it a point of honour to give **accurate, transparent, truthful and verifiable information in good time**. To this end, since 2009, the Group has been publishing a financial report which presents all accounts in accordance with international IFRS accounting standards.

## **ON THE MARKET**

The John Cockerill ethical practices also apply to the relations the Group has with the market, which is made up of its clients, suppliers and competitors.

#### *With regard to clients*

The clients' satisfaction and, as a consequence, the continuation of our Group, depend on clearly identified factors:

- Continuous improvement in offering (products and services)
- A spirit of innovation
- Listening to, understanding and even anticipating needs

These requirements imply:

- Open dialogue based on accurate and truthful information
- Respect for rules covering commercially sensitive information
- Transparency in procedures operated by John Cockerill
- Respect for commitments and for competition rules

#### *With regard to suppliers*

The quality of the products and services supplied by John Cockerill to its clients is also dependent on its capacity to obtain an excellent service from its suppliers and partners. As a result:

- The suppliers' selection must be **impartial, equitable and demanding**. The Group thus selects them for their professionalism and competitiveness within the perspective of a relationship of confidence and of objectivity.
- Every negotiation respects **the principles of quality** set out in the quality manuals in force within the entities concerned. Within this framework, the **collective dimension of the purchasing decision** brings together all involved parties.



- Buyers have to demonstrate irreproachable ethics and conform to **regulations**, particularly those involving competition rules. They must also permanently act in accordance with purchasing commandments published by the Group 'Procurement Committee'.
- Ethics principles are also expressed through the **integration of environmental and society preoccupations** into selection criteria from suppliers.
- Each entity of John Cockerill is obliged to **consult other entities of the Group** when these may be well placed to be suppliers within the context of a transaction.
- John Cockerill commits its **commercial partners, sub-contractors and suppliers** to adopt, if this has not already been done, ethical, environmental and social rules compatible with its own.

#### *With regard to competitors*

John Cockerill Group respects the rules of functioning of the market. To comply with these it complies with **competition rules** and rules within regulated markets by adopting **fair behavior**: in particular, it refrains from denigrating or defaming its competitors. It only uses **legal and honest methods** to gather information about competitors.

#### **Protection of information**

John Cockerill protects its confidential information as well as that which may have been confided to it by suppliers, partners or clients. It protects its intellectual property through the practice of registering patents and brands.

## **IN SOCIETY**

The John Cockerill Group assumes its responsibilities with regard to society by making available to industrial enterprises and the human community the necessary technologies and equipment to respond to the needs of current and future generations. By doing this, John Cockerill wishes to generate progress which benefits both the communities in which it is located and the planet.

#### *For the community*

In order to contribute to the development of the regions in which it is located:

- John Cockerill **supports** (through practices of patronage, sponsoring...) education, cultural, economic and sporting activities and local initiatives. These activities must be transparent and lawful. On top of this, the Group does not permit any financing of political or religious activities.
- Its representatives ensure that they are **present within local bodies** where they may be invited and that they listen attentively to the demands of local inhabitants.
- John Cockerill **attaches importance to integrity and disapproves of corruption in all its forms**; it ensures that members of the personnel who commit to making sure this principle is respected do not suffer any prejudice for this.
- John Cockerill seeks to **understand and respect all cultures** with which it comes into contact; within itself or with respect to clients and partners.

John Cockerill sets out to respect the laws in force in the countries in which it is present. On top of this, it intends **to be in line with the main international ethical standards**.



### *For the planet*

The preservation of the environment and sustainable development are of particular importance to John Cockerill. The Group's fundamental statements clearly set this out and the Group does everything in its power to apply this both within its own activities and those of its clients.

- **For its own activities:** John Cockerill is concerned to preserve natural resources and to reduce its environmental footprint. The Group respects local legal and regulatory requirements where the environment is concerned. It takes care to deploy ISO 14001 certification as widely as possible and to raise awareness amongst its personnel of the environmental stakes.
- **For its clients:** John Cockerill encourages research and innovation to develop know-how relating to the reduction of the environmental footprint of industries and other sectors, such as mobility, and the production of renewable energy.



# HOW TO RESOLVE AN ETHICAL PROBLEM?

## GET INFORMED

Within the John Cockerill Group, the deployment of ethics best practices is based on specific training programs and on an education process inside entities. The Group commits to inform and to provide the necessary material, however this doesn't prevent every employee to seek information should she/he not be informed yet.

## TALK ABOUT IT!

Even though many documents are made available to guide the personnel in the area of ethical professional behavior, the variety and scope of situations do not enable every possible case to be covered. To find a response which complies with ethics, it is sometimes necessary to talk with those around you.

### Who to approach?

- You have a concern about how to act and are asking yourself which procedure to follow.
- You wish to obtain advice.
- You think that company rules are being infringed or about to be.
- You think that you are, or are going to be, implicated in an act contrary to the regulations of your company.

According to the nature of your concern, you can approach:

- For employees, at the managerial level, starting with the direct line manager or/and a trustworthy person in the professional entourage
- The Group Ethics Committee

## ETHICS E-MAIL: A SPECIFIC INSTRUMENT

For all ethical questions which may not obtain a response via the managerial chain, John Cockerill makes an e-mail address available to the personnel, which enables them to directly question the Group Ethics Committee. This procedure prioritises grave instances of malfunction which have the capacity to harm the vital interests of the Group or the physical or moral integrity of its employees. The person in charge of this in-box is committed to treat every request which arrives confidentially and to follow it up, either directly or via the Group Ethics Committee.



# ETHICS IN PRACTICE

When faced with an ethical problem, the points of reference set out in this document must always be kept in mind and respected, if necessary by asking the hierarchy and/or the Ethics Committee. Below are the main situations to be managed in an ethical manner:

- Fraud
- Corruption
- Competition
- Gifts, invitations and trips
- Conflict of interest
- Sales representations
- Sponsoring, patronage and partnerships
- Communication
- Traceability and truthfulness of documents
- Intellectual protection
- Protection of company assets
- Environment, health and safety

## FRAUD AND CORRUPTION

Fraud and corruption within a company represent a sensitive subject, bearing witness to something which is profoundly wrong and whose impact is often underestimated. However, fraud leads to financial costs which can be high and difficult to recover, and more generally, it represents a risk for all persons and all companies.

### Definitions: fraud and corruption

John Cockerill considers a **fraud** to be any voluntary or hidden action or omission committed with the intention of deceiving or of diverging from company rules, with the aim of obtaining an unmerited material (examples: reimbursement of undue expenses, inappropriate use of fuel card, ...) or moral advantage (examples: false resume, manipulation of the financial results or budgets) for the fraudster or a third party.

**Corruption is one of the forms of fraud.** It designates an illegal pact between two or more persons. Active (providing a benefit to someone else with a view to altering the decision-making process) or passive (receiving a benefit in exchange for influence exercised to alter a decision), corruption manifests itself in a number of ways such as a bonus, commission, misappropriation or extortion which consists of setting conditions for the granting of a deal.

John Cockerill forbids fraud and corruption in all their forms, whatever the moment, the place or the circumstances, including amongst others : the theft of money, goods, data, voluntary degradation, the hiding or destruction of documents, false texts or declarations, account manipulation, counterfeit, money laundering, swindling...

Any fraudulent act leads to sanctions set out by the law and by the John Cockerill Group's internal decision-making bodies.



## COMPETITION

The Group attaches the highest importance to the respect for competition laws and rejects all anti-competitive practices. Staff members are urged to adopt irreproachable behavior with regard to competitors, clients, suppliers and prospects. The following are in particular prohibited: illicit agreements, abuse of a dominant position, acts of corruption, exchanging privileged information, discriminatory, excessive or predatory pricing etc. All members of the Group will exclusively use legal and ethical means for gathering information about competitors; as an example, intrusion and the concealing of identity are illicit. Members of staff will refrain from defamation or denigration of competitors and will not draw any advantage from documents which are inaccurate, falsified or deformed.

Finally, when an entity of John Cockerill participates in a regulated market, it has to inform its staff members of regulations which concern them and ensure these are correctly applied.

## GIFTS, INVITATIONS AND TRIPS

In general terms, the Group wishes to limit as far as possible the cost and number of gifts and invitations, whether these are given or received by Group personnel. Each member of staff can consult his superiors to find out what is acceptable within his entity.

Gifts and invitations are a mark of courtesy and should correspond to local tastes and customs. A good reflex: never accept to offer or receive a gift or invitation that, for one reason or another, makes you uncomfortable or risks making your interlocutor or those around you feel uncomfortable.

And finally, any prospective trip, whether it is to be received or offered within the professional context, has to receive prior authorization from the hierarchical structure.

## CONFLICT OF INTEREST

### Definition: conflict of interest

By conflict of interest is meant a situation in which the behavior of a person acting in a professional capacity may be excessively influenced by a secondary interest which does not involve the company. This is the case, for example:

-when a member of staff finds himself in a position where he could take a decision which is not in the interests of the company, but in his own interests, or even those of a relative or friend.

-when a member of staff exercises a professional activity outside of John Cockerill and pays attention to this to the detriment of the time he dedicates to his function within the Group.

Where any doubt exists, it is recommended for a member of staff to check with his or her superiors that a conflict of interest situation does not exist. This advice is particularly appropriate if he or one of his relatives has interests in a company or organisation that is a customer, competitor or supplier of the company. It is also appropriate if he or she carries out a professional activity outside the company. Similarly, in the event of responsibility in client associations or communities, it is advisable to abstain from voting when awarding a contract or making a decision relating to a Group company. The financial members of the Group are obliged to declare potential or actual conflicts of interest to their superiors or to the Group CFO, in accordance with the 'Code of good conduct of Group financial personnel'.



## **SALES REPRESENTATIONS**

In order to support the bringing to market of its goods and services, the John Cockerill Group calls upon the skills and networks of commercial partners active within the different regions of the world in which the Group has a presence. The selection of these partners cannot be done without the formal agreement of the Group Legal and Commercial Management which will transmit to them the ethical principles to be followed.

## **SPONSORING, PATRONAGE AND PARTNERSHIPS**

Within respect for certain rules, John Cockerill authorises sponsoring, patronage and partnership activities, as these bear witness to good citizenship and social responsibility. Only persons duly authorised by their hierarchical superiors are allowed to order or initiate such activities. Members of staff will ensure that these activities are valid, and that they do not create situations of conflict of interest nor constitute a means of financial misappropriation. On top of this, the Group forbids any financing of political or religious activities.

## **COMMUNICATION**

In all of its communication activities, the Group and its entities commit to the information being accurate, complete, precise, comprehensible and published in good time.

### **Spokespersons**

Only those persons duly mandated have the right to speak in the name of the entities; they will use official communication material made available and will inform Group Corporate Communication in advance. A member of staff who wished to speak in public, publish or respond to an interview on a subject which involves an entity of the Group or the Group itself has to be authorised by a person mandated to do this.

### **Confidentiality**

Within the context of his or her function, each member of staff may be called upon to manage or hold a large quantity of information. This may involve the clientele, personnel, the company or more generally the economic, commercial or legal environment of the company (commercial or financial partners, suppliers, administrations, other companies within the Group etc.).

As a general rule, any information which has not been made public should be considered as confidential. Information which is covered by specific regulations in certain domains of activity, such as for example sensitive commercial information, should receive particular attention. Both inside and outside John Cockerill, employees are advised to maintain the highest degree of discretion regarding information of any nature arising from or relating to their company. If such information has to be passed on to a contact person to enable him/her to fulfil his/her mission, only the necessary information should be entrusted to him/her, in particular if it belongs wholly or partly to a third party or a service provider. He must also be informed of the degree of confidentiality of the information transmitted to him.

A large part of the confidential information to which members of the personnel have access is held on computers, which is why the Group has defined certain rules regarding information systems, to which everyone must adhere.

### **Financial communication**

John Cockerill financial communication takes place via a certain number of reports and through meetings with the press. The major published reports are the 'Activities Report' and the 'Financial Report'. The information published in these is official and is the only information



which can be communicated outside of the Group. Group financial communication is the sole responsibility of the Communication and Financial Boards.

### **Privileged information and insider dealing by persons involved within the framework of listed companies**

#### **Definition: privileged information**

Any precise information directly or indirectly involving a quoted company which has not been officially made public – and which if it were to be made public could impact upon the share values of this company or those of financial products allied to these shares (shares, obligations, loans, purchasing or sales options etc.) – is considered as privileged. Certain privileged information may also involve financial measures.

A person who holds privileged information is by default considered an insider. Under pain of 'insider dealing', a person holding privileged information involving a quoted company must refrain from buying or selling shares in this company, and even from recommending or suggesting to a third party to buy, sell or keep these shares during a period determined by local regulations. This prohibition involves the shares of the company of which the person is a member along with any other quoted company about which the person may hold privileged information.

### **TRACEABILITY AND TRUTHFULNESS OF DOCUMENTS**

In general terms, it is prudent to keep a written trace of the principal phases of a decision or act liable to engage the responsibility of an entity or a colleague. This may involve any document having been used to establish scientific, technical, administrative, accounting or financial results. These documents must be conserved in accordance with internal or external regulations applying to them.

Documents drawn up inside the Group, along with those kept in archives, must exactly and accurately reflect the facts, dates and places to which they refer. All John Cockerill members must refrain from drawing up false documents or falsifying documents. If someone suspects that such a document exists, he has to immediately advise his superiors or even the Group Ethics Committee of this. Finally, these documents and other registers must be conserved over the long term and in the form required by the laws and regulations in force.

### **DELEGATION OF POWER**

John Cockerill as a company represents a collection of interests in which each person has a role to play. Manager or staff member, each person contributes to the overall performance of the company and holds a part of the responsibility corresponding to his or her field of activities. Within this framework, in order to guarantee a good distribution of skills, obligations and responsibilities, the management has to ensure the effective and operational operation of delegation of power and of the signature necessary.

Each collaborator must know who can take decisions and who can put them into practice. This requirement, which is legally regulated by the statutes of the company for the highest levels of decision making, must be put in place at every level of the Group.

Good ethics practice in the domain of delegation of power led to:

- Set up a hierarchical structure which reduces decision making powers (power of decision) and execution powers (power of representation through signing acts, correspondence, and documents). It is clearly not sufficient to establish a simple organigram but to very clearly set



out who can decide what and who can put these decisions into practice, and to make this known to the persons concerned.

- Oblige everyone to respect the company statutes and the hierarchical structure of power which this has established.

## **PROTECTION OF COMPANY ASSETS**

Group assets must be used solely for professional purposes, under legitimate conditions and with legitimate authorisation. Each member of staff will ensure, within the bounds of possibility, that all company property is protected and in good condition, will avoid causing any damage to it and ensure that no fraudulent use is made of it. This rule applies to **material goods** (property, premises, office equipment, tools, furniture, cars etc.) and to **immaterial assets** (patents, information, image, software, brands, reputation etc.).

A member of staff who observes that protection measures are insufficient should alert his superior to this fact, the same applying to becoming aware of theft or attempted theft, piracy, espionage, sabotage or deterioration.

## **INTELLECTUAL PROPERTY**

In the same way as staff members are called upon to protect Group immaterial assets, they must also keep a check on the intellectual property of the Group or of others. This is all the more important for engineering activities where intellectual property is vital.

Where others are concerned, everyone should avoid, for example, the unauthorised use of patents and authors' rights and should avoid copying or plagiarising the brands, studies, projects or publications of others.

Where John Cockerill is concerned, everyone should ask himself about opportunities for protecting a piece of research, a development, a study... by contacting the Development Department in good time.

## **ENVIRONMENT, HEALTH AND SAFETY**

John Cockerill has a concern for the impact of its activities with regard to all involved parties and to the environment. This is why it has drawn up a thorough policy in the domains of environment, health and safety. Certifications are put in place as and where possible.

The commitment and vigilance of everyone are necessary to enable this policy to evolve into sustainable commitments, more and more ambitious and safe, respectful of individuals, the company and the planet.

## **PURCHASING AND SUPPLIERS**

Members of staff who are in professional relations with third parties must be particularly attentive to respect for good ethical behavior. This is particularly true for members of the Group in contact with suppliers, service providers and sub-contractors: specification setters, buyers, supplies providers, managers and more generally, anyone involved in the purchasing process. These persons have to follow the ethics principles set out in this document and also have to conform to the rules of ethics of the Group purchasing policy which involve them in the daily exercise of their professional activities.



**Supplier relations: 7 ethical principles**

1. Respect laws, external norms, Group values and internal procedures.
2. Act equitably towards suppliers and with transparency and impartiality
3. Respect and ensure the respect by others of mutual commitments.
4. Ensure the confidentiality of all information exchanged.
5. Make known and respected the commitments of the Group in terms of ethics, sustainable development and social responsibility.
6. Avoid any conflict of interest which may modify objectivity and independence of judgement.
7. Make known the existence of situations contrary to these rules.

