

INDEPENDENCE
INNOVATION
QUALITY
REACTIVITY



GROUP CODE OF ETHICS

JEAN-LOUIS PECH

ACTIA Group CEO



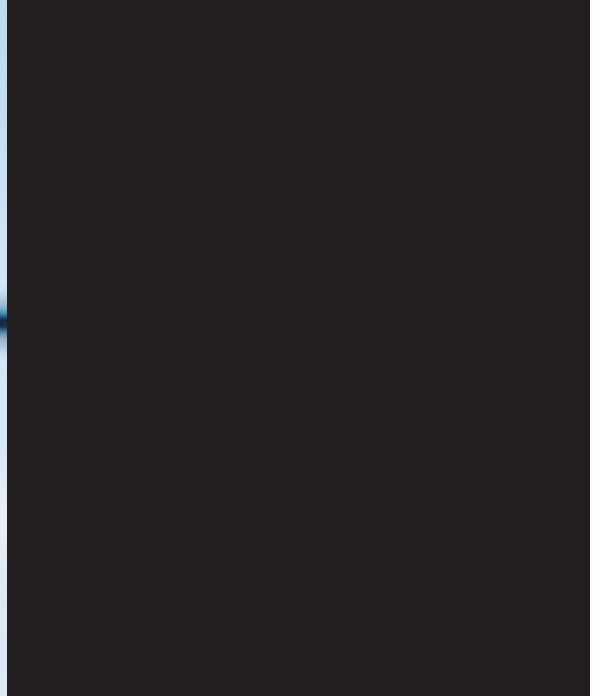
Ever since it was founded, our Group has been built on and has grown thanks to strong values that ensure its long term health and guide the behaviour of each of us :

Independence, Innovation, Quality, Reactivity.

In this highly competitive environment, we, the employees of ACTIA Group, commit collectively and individually to respecting the principles of integrity on an everyday basis, in accordance with the recommendations of the United Nations and OECD.

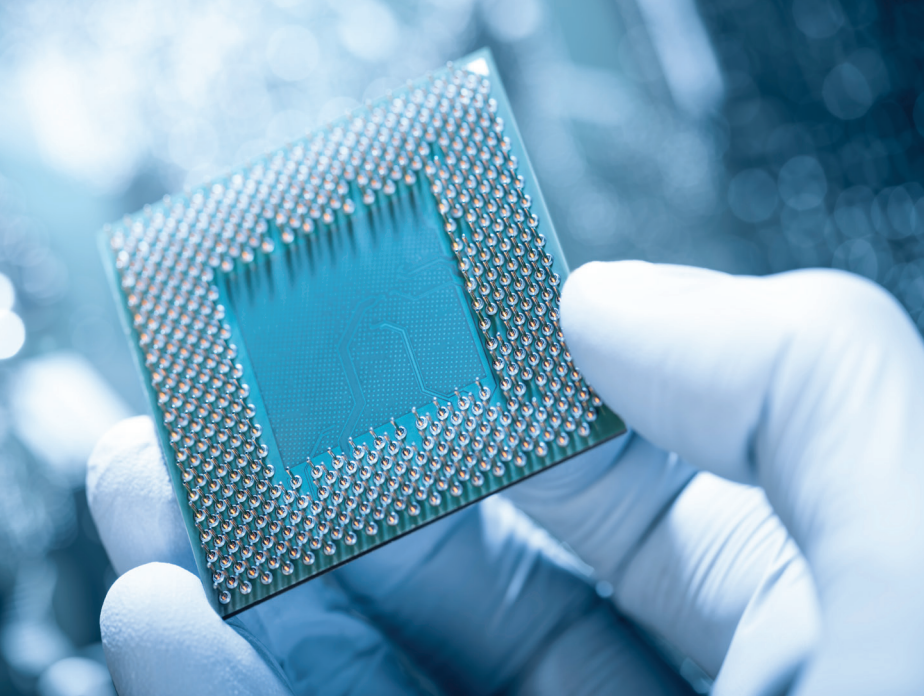
This Code of Ethics, shared by every employees in the Group, outlines the main principles of the rules and commitments that we intend to apply and follow on a daily basis within the Group. It concerns us, both as an individual and collectively.

Sharing our values is essential. We have a duty to pass them on to our colleagues, suppliers, customers and partners alike.



INDEPENDENCE

Independence in terms of our capital, to safeguard our freedom of choice in matters of strategy, investment and growth, while maintaining our decision-making centre in France. Our priority is to retain the majority of voting rights and the majority of the Group's share capital in order to preserve our independence in terms of decision making and to continue build a long term strategy.



INNOVATION

Innovation, to be competitive and attractive for our customers, suppliers and employees. In today's world, innovation is necessary in order to survive in the market place. That is why we continue to invest in human and financial terms in Research & Development, which is the key to innovation ; our strategy is to anticipate customers' needs to ensure the Group's continued relevance and success.



QUALITY

Quality, an essential value for surviving in a global competitive environment. As a decisive factor in maintaining a competitive edge in today's world, quality concerns us all. Certifications attest to quality, but above all, quality is a mindset that must be upheld at every step from development to production.



REACTIVITY

Reactivity, to meet or even anticipate our customers' needs and make the difference when faced with far larger competitors. In today's world, responsiveness is a major asset, both within our organisation and regarding our environment.

OUR COMMITMENTS

Our priority is to make Human Rights and the Environment primary concerns within the Group in order to ensure its lasting success.

We pledge to ensure that the commitments we made in terms of corporate social and environmental responsibility, are shared by all subsidiaries in the Group, by every employee, and by our customers and suppliers, always and everywhere.

To support and uphold Human Rights, as defined in Article I of the Convention for the Protection of Human Rights and Fundamental Freedoms, in all circumstances, in every country in which we operate. We therefore strive to respect every individual's right to life, the prohibition of slavery and forced labour, right to liberty and security, right to respect for private and family life, freedom of thought, conscience and religion, freedom of expression, freedom of assembly and association, and right to fairness, social dialogue, and personal development.



not to be complicit in any Human Rights violations

To carefully and conscientiously choose our partners, customers and suppliers, so as not to be complicit in any Human Rights violations. To ensure that they put into practice our commitments with regard to safety, ethics, social and environmental policy. To demand that they enforce these principles through self-surveillance.

ON SOCIAL TOPICS

not to tolerate any form of child labour or forced labour

Not to tolerate any form of child labour, for any part of our activities or contribution thereto. We pledge to abide by regulations on minimal age of employment in all our areas of operations.

ACTIA does not make use of forced labor or modern slavery, such as bonded labor or seizing ID documents of workers.

to ensure safety and security...

To make every effort to ensure the safety and security of all of our employees and customers and ensure decent working conditions.

a fair working environment

We base the relations with our employees on respect and fairness. We respect the applicable laws and the collective agreements, especially regarding duration of work and minimum salary.

We respect the right of our employees to free expression and free association, as well as regulations related to trade unions.

to combat discrimination and harassment in any form

To refuse any form of discriminatory behaviour during the hiring process or within the company. Any kind of discrimination, such as age, sex, religion, opinions on politics or trade unions, social origins and ethnic affiliations (genuine or alleged) is strictly prohibited.

We maintain a respectful work environment and we fight harassment in any form.

AGAINST CORRUPTION AND FRAUD

” ***to combat corruption, fraud and money laundering***

To combat corruption, fraud and money laundering, in any form, in any country, for any purpose, and to ban conflicts of interest.

We must not under any circumstances accept or give bribes or receive or send invitations or gifts that could influence our decisions.

In the area of Fair Competition, ACTIA abides by the applicable laws and engages in competition as a loyal player.



TO TAKE CONCRETE ACTIONS TO PROTECT THE ENVIRONMENT

- To respect environmental laws and even go beyond, especially through the ISO 14001 certification of main ACTIA sites.
- To innovate and anticipate priorities in protecting the environment, with a view to preserving and improving living conditions.
- To promote the environmental responsibility initiative both within and outside the company.
- To encourage the development of processes and technologies aimed at protecting the environment.
- To reduce the impact of our activities on the environment, notably by upgrading our production tools.
- To make sustainable development a top priority in the design of our products.

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