

A background image showing a pair of ornate, golden scales of justice. The scales are positioned over a blurred world map. The bottom portion of the image is overlaid with a solid blue diagonal band. The word "ETHICS CHARTER" is written in white, bold, sans-serif capital letters across this blue band.

# ETHICS CHARTER

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## MESSAGE FROM THE CHAIRMAN

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The GINGER Group studies, provides and implements solutions for projects ranging from the simplest to the most complex, making them safer and more sustainable in all areas that enable people to meet their needs for work, transport, housing and food.

The GINGER Group upholds strong values of technical expertise, proximity, experience and security. Our technical excellence and extensive network of local offices are designed to ensure client satisfaction. Through its decentralised organisation, the GINGER Group has developed a culture based on the shared values of openness and responsibility, which it aims to promote.

Our commitment applies to all our businesses and entities in France and abroad and is based on our three ethical values of Respect, Integrity and Professionalism.

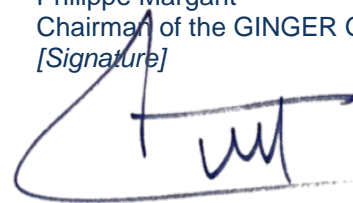
This Ethics Charter sets out the key principles of conduct and integrity to which all our employees, service providers and suppliers must adhere.

This Charter is supplemented in particular by our Anti-Corruption Code of Conduct and the whistleblowing procedure.

The Ethics Charter is the cornerstone of the GINGER Group's Ethics & Compliance policy.

It is the personal responsibility of every GINGER Group employee to conduct their activities in accordance with our values and to be familiar with and apply the principles set out in this Ethics Charter.

Philippe Margarit  
Chairman of the GINGER Group  
[Signature]

A handwritten signature in dark blue ink, consisting of a large, stylized 'P' followed by several loops and a horizontal stroke.

## THE GINGER GROUP'S ETHICS & COMPLIANCE POLICY

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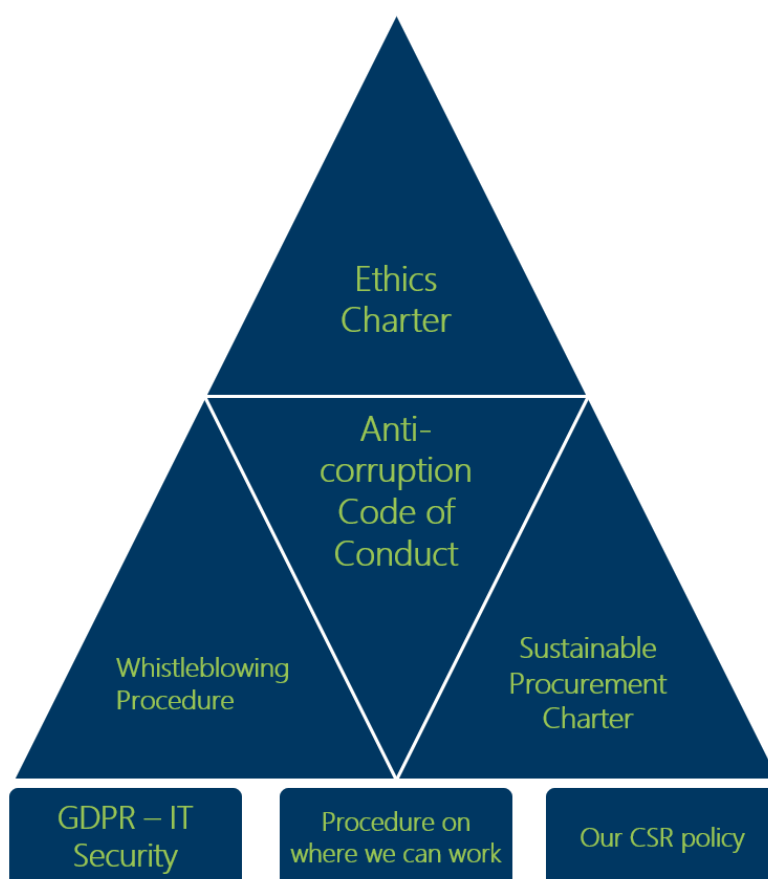
The GINGER Group has adopted an Ethics & Compliance policy, the cornerstone of which is its **Ethics Charter**. It defines the values of the GINGER Group and the expectations of each member of staff within the Group, whether employee or manager.

It also applies to the various stakeholders involved in our activities, including subcontractors, co-contractors, clients, suppliers, external consultants and experts, and intermediaries.

The Ethics Charter is available on the GINGER Group's intranet site. It is also provided to new employees in the welcome booklet.

Each entity within the Group ensures that its employees are aware of this Charter, using whichever means are most appropriate.

Other components complement the Ethics & Compliance policy.



# RESPECT

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## ***Respect for people***

Showing respect for everyone you meet during your professional activities is a core value of the Ginger Group.

The Ginger Group encourages diversity and recognises that it add value to a company and contributes significantly to its creativity and growth.

Ginger Group employees undertake to:

- Respect the rules of society and preserve the dignity of all those with whom they interact,
- Refrain from any behaviour that could be intimidating or harassing,
- Prohibit any form of discrimination based on gender, age, origin, nationality, religion, belief, sexual orientation, physical appearance, health, disability, trade union membership, marital status, etc.

The GINGER Group is committed to respecting the human rights and fundamental freedoms of its employees and stakeholders in all its subsidiaries by complying with:

- the principles of the United Nations Universal Declaration of Human Rights;
- the fundamental conventions of the International Labour Organisation (ILO), particularly those relating to forced labour and child labour;
- the principles of the United Nations Global Compact.

## ***Respect for property***

The protection of GINGER Group property is the responsibility of each employee. This includes tangible assets, such as company cars, machinery, furniture, office supplies, IT equipment, securities and cash, as well as intangible assets, such as software, patents, trademarks, copyrights and know-how.

These assets must be used and maintained with care and respect to avoid any waste or misuse.

GINGER Group employees must use the Group's assets in accordance with procedures, comply with security programmes and protect all confidential information belonging to the GINGER Group against the risk of disclosure or misuse.

GINGER Group employees undertake to:

- Apply security instructions,
- Comply with the rules of use and take care of all equipment,
- Comply with the IT charter and, more specifically, the provisions relating to integrity and security,
- Report any malfunctions or breakdowns in the equipment they use.

## ***Respect for personal information and data***

GINGER Group employees must protect the integrity and security of the company's IT system by strictly complying with internal rules and instructions.

The GINGER Group is committed to implementing technical and organisational measures to protect the personal data of all individuals as effectively as possible.

## ***Respect for the environment***

The GINGER Group takes the impact of its activities on the natural environment into account and adopts a socially and environmentally responsible attitude, reflected in a proactive CSR approach.

The recommendations produced by the GINGER Group must promote the sustainability of its clients' structures and must minimise the environmental impact of projects.

Ginger Group employees contribute to the improvement of the Group's environmental footprint by purchasing environmentally friendly equipment and products, reducing waste production, managing construction waste, consuming less water and energy, and applying briefing note G.22-02 (relating to the Group's energy efficiency plan, available on Univers), to name a few. Clients and partners should be encouraged to do the same.

## **INTEGRITY**

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### ***Honesty***

Honesty is required at all times from all GINGER Group employees.

The GINGER Group's competitive advantage is in no way based on unethical or illegal practices.

### ***Preventing and fighting corruption***

Corruption consists of directly or indirectly offering, promising, giving, consenting to give or authorising the payment of money or anything else of value to a third party with the aim of influencing a decision or commercial transaction, or consenting to or accepting an undue advantage that runs counter to official duties and respect for the rights of others.

Corruption, as with influence peddling, creates inequality and undermines stakeholder confidence. It can result in criminal and disciplinary sanctions, among other consequences.

The GINGER Group prohibits all forms of corruption in its commercial transactions and complies with international anti-corruption conventions and the anti-corruption laws of the countries in which it operates.

The GINGER Group's Anti-Corruption Code of Conduct outlines the behaviour to be adopted in situations involving requests, such as corruption, influence peddling, facilitation payments, gifts and invitations.

### ***The fight against fraud***

Fraud is an intentional act that involves deliberately deceiving others in order to obtain an unlawful benefit or to circumvent legal obligations or professional rules.

It takes the form of either outright theft of company funds, securities or property, or the concealment or falsification of documents with the aim of unduly obtaining such funds, securities or property.

The GINGER Group has put in place internal controls designed to detect and prevent fraud.

## ***Loyalty to the GINGER Group***

All communication can have an impact on the reputation of the GINGER Group. Employees should demonstrate loyalty to the GINGER Group, particularly in the media and on social networks, and should refrain from any disparaging remarks.

Before responding to a journalist, be sure to consult the GINGER Group's Communications Department.

## ***Fair competition***

In matters of competition, any agreements, arrangements or practices, whether written or unwritten, between competitors, particularly concerning prices, territories, market shares or clients are prohibited.

The GINGER Group undertakes to act fairly on the market and not to take any action that could distort competition.

The GINGER Group prohibits its employees from disparaging its competitors.

## ***Conflict of interest***

A conflict of interest exists when an employee or someone close to them can personally benefit from a transaction involving a GINGER Group company, or when an employee attempts to favour a company or individual in a transaction in which they or someone close to them has a financial interest.

All employees must report any potential personal conflict of interest to their manager so that management can make an informed decision.

## ***Selection of suppliers/subcontractors/service providers***

When selecting suppliers/subcontractors/service providers for the GINGER Group, factors such as quality, requirements, performance and costs must be taken into account. During negotiations with suppliers and service providers, it is the responsibility of every GINGER Group employee to defend the Group's interests to the best of their ability and to obtain the best terms and conditions in accordance with the regulations in effect, without any favouritism based on friendship, family ties or discriminatory criteria. Favouritism is strictly prohibited.

It is also prohibited to accept any gifts or benefits of any kind from suppliers and clients, particularly sums of money, goods, services, leisure activities or personal travel, unless such gifts or benefits are of reasonable value (€200) or are part of a multi-client/supplier event whose participation has been approved in advance (refer to the Code of Conduct).

For consultants and other service providers, all agreements entered into with the GINGER Group must contain a precise list of the services expected, the basis for calculating prices and fees, and all contractual conditions. All payments shall be subject to the receipt of services.

## ***Accuracy of data, accounts and records***

All assets, liabilities, expenses and other transactions relating to GINGER Group companies must be recorded in the companies' books and accounts and managed faithfully and accurately in accordance with applicable accounting principles, rules and laws.

In order to ensure proper record-keeping and management of data and documents, management and archiving procedures must be defined.

The GINGER Group's companies must not hold any secret funds or unregistered assets for any reason whatsoever. Documents relating to commercial or financial transactions must accurately reflect the transactions in question.

No payment shall be approved or made if all or part of it is intended for purposes other than those described in the relevant supporting documents. The books and records of the GINGER Group's companies must not contain any false or fictitious entries.

## PROFESSIONALISM

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The GINGER Group bases its reputation on the impeccable quality of its services.

### ***Competence in the assignments accepted***

Each employee of the GINGER Group undertakes to perform the services assigned to him/her in accordance with his/her skills and in compliance with the laws, regulations and technical standards in effect.

Each entity of the GINGER Group ensures client satisfaction. To this end, the Group provides employees with all the documents necessary to carry out their assignments to the highest standard, comply with the laws, regulations and technical standards in effect, and ensure the verification and/or validation of deliverables.

### ***Integrity in the performance of services***

Technical data is analysed with integrity and without bias. No modification of reality is tolerated. For example, it is prohibited to sort the results of tests or analyses in order to retain only compliant values, even at the express request of the client.

### ***Confidentiality***

GINGER Group employees have access to a wide range of information relating to the Group's activities, employees, clients and partners while carrying out their duties.

GINGER Group employees must ensure that sensitive information to which they have access is kept confidential.

In general, any information that has not been made public should be considered confidential.

By way of example and without limitation, the following information is confidential and must be protected : (i) personal data relating to any individual, (ii) sensitive technical data, (iii) results, forecasts and financial data, and (iv) international development projects, acquisition or disposal projects, commercial and pricing information, and research and innovation projects.

Some good practices to adopt include the following:

- Do not leave sensitive documents around printers, in meeting rooms or on your desk when you are absent.



- Ensure that you do not process (on your laptop, etc.) or exchange confidential information in public places (discussions on trains, planes, in restaurants, etc.).
- Arrange for confidentiality agreements to be signed with your co-contractors, subcontractors, etc.
- The obligation and duty of confidentiality continue even after the employee has left the company.

GINGER Group employees comply with the General Data Protection Regulation in relation to both Group employees and third parties.

Only employees whose duties and responsibilities explicitly require the processing of such information have access to personal data, and only for the purposes for which it was collected and processed.

## ***Security***

The GINGER Group is committed to complying with security standards.

This commitment rests with every employee of the GINGER Group, who must strictly comply with the legal and regulatory obligations and procedures of the GINGER Group subsidiary where they work in terms of health and safety, as well as those of our clients under the terms of our contracts.

Everyone must also exercise caution to avoid compromising their own safety or that of others, and identify and report any hazards, security system failures and workplace accidents.

## **ADOPTION OF THE COMPLIANCE & ETHICS APPROACH**

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### ***Dissemination***

The Ethics Charter is available on the GINGER Group intranet site. It is also provided to new employees in the welcome booklet. The Ethics Charter is an appendix to the internal regulations.

Each subsidiary, site or branch ensures that its employees are aware of this Charter, using whichever means are most appropriate (seminars, meetings, etc.).

### ***How to make a report***

If an employee is confronted with a suspected or proven violation of the rules of the Ethics Charter, they can refer to the GINGER Group's Whistleblowing Procedure, which is available on the Group's intranet. By contacting the ethics officer ([referent.ethique@groupeginger.com](mailto:referent.ethique@groupeginger.com)) via the Whistleblowing Procedure, the employee benefits from whistleblower protection.

Employees may also get in touch with:

- their usual contacts: their line manager and/or human resources department,
- the ethics officer for advice prior to using the whistleblowing procedure, by sending an email to the following address: [referent.ethique@groupeginger.com](mailto:referent.ethique@groupeginger.com).

In both cases above, the employee does not benefit from whistleblower protection.

The report triggered by the employee will be handled diligently and in accordance with the principles of confidentiality and personal data protection.

GINGER undertakes that no employee will be subject to discrimination and/or disciplinary measures for having made a report in good faith and without malicious intent.

### ***Employee training***

Fostering integrity involves, among other things, a training programme for GINGER Group employees to raise their awareness of the risk of corruption, help them develop the right reflexes and adopt appropriate behaviours.

This training programme includes e-learning modules that all employees must complete.

### ***Disciplinary sanctions in the event of misconduct***

In the event of non-compliance with the provisions of the Ethics Charter, GINGER may take disciplinary action against the employee, which may include dismissal. Disciplinary measures are outlined in the internal regulations of the company to which the relevant employee belongs.

The employee may also be subject to civil and criminal legal proceedings.

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