

	REFERENCE	<b>CODE OF ETHICS</b>	Version A 01/06/22
	P1_DOC_004		Page 1 / 5

## FOREWORD

Tiama is firmly committed to being a responsible and exemplary company and makes every effort to carry out its activities in an ethical and exemplary manner, in all the countries where it operates. We strive to establish at the level of the Management and all employees a culture of behavior in accordance with these values and count on each of you to respect the principles defined in this charter.

Indeed, any breach of ethics can lead to legal and financial consequences for TIAMA and its employees, harm the image and reputation of the company, and cause commercial risks and destabilization of the organization of the company's business.

Furthermore, corruption and influence peddling are major causes of poverty and poor distribution of wealth. These acts also hinder economic development and contribute to the political and social destabilization of sovereign States. As such, they are universally considered as serious offences and will not be tolerated.

Your commitment and participation are essential, and through all our individual and collective efforts, we will be able to conduct our business in an ethical and responsible way.

Benoit Burin-des-Roziers, CEO of Tiama



	REFERENCE	<b>CODE OF ETHICS</b>	Version A 01/06/22
	P1_DOC_004		Page 2 / 5

### **PRINCIPLE 1: COMPLY WITH LAWS AND REGULATIONS IN FORCE**

Tiama is committed to strictly comply with the laws and regulations in force, whether in France or abroad, in all circumstances.

As an internationally operating company, Tiama complies with customs and export control regulations applicable to national and international trade.

Tiama follows international guidelines and regulations regarding embargoed countries.

### **PRINCIPLE 2: ADOPT AN HONEST ATTITUDE**

Tiama is committed to respect others in their diversity, cultural, political, and religious practices.

We forbid any prejudice or stereotype that would call into question the principle of equality.

We encourage respect, openness and consideration for others while respecting their privacy and fundamental rights.

### **PRINCIPLE 3: FIGHT AGAINST CORRUPTION AND INFLUENCE PEDDLING**

Tiama is committed to fight against corruption by systematically refusing financial or in-kind compensation in exchange for a service or a transaction.

Gifts and invitations are part of the way of life that we defend and contribute to the maintenance of a good relationship. But it must absolutely remain within the realm of reasonableness and in no case be solicited or in exchange for any advantage.

We promise not to use our position or responsibility to obtain a favor from anyone.

Finally, we are careful not to inadvertently contribute to the laundering of money from criminal activities.

### **PRINCIPLE 4: RESPECT OUR CUSTOMERS, SUPPLIERS AND COMPETITORS**

Tiama is committed to conduct its business in an ethical way by respecting the commitments made in the context of our relations with our stakeholders.

We forbid any unfair competition or anti-competitive agreements that would aim to penalize customers in our sector of activity.

We favor the satisfaction of our customers by implementing all the necessary means to fulfill the commitments we have made and by being a source of proposals for the continuous improvement of our products and services to meet their needs.

	REFERENCE	<b>CODE OF ETHICS</b>	Version A 01/06/22
	P1_DOC_004		Page 3 / 5

## **PRINCIPLE 5: PROTECT OUR ENVIRONMENT**

In a proactive approach, Tiama is committed to contribute to a more responsible economy to reduce our impact on the environment to make it sustainable. Our actions aim to measure this impact, determine our roadmap and work to achieve a better future for all in accordance with the 17 Sustainable Development Goals of the United Nations (2030 Agenda).

## **PRINCIPLE 6: LIVE AND GROW TOGETHER**

Tiama sets itself ambitious goals every year as well as a strategy to achieve them.

We ensure that each employee has the resources and skills needed to achieve it, to develop individually and collectively, and to achieve their personal objectives.

Tiama encourages initiative, promotes collaboration, values individual and collective commitment and promotes an entrepreneurial approach based on individual responsibility.

## **PRINCIPLE 7: PROTECT INFORMATION**

Tiama asks its employees to treat the information at their disposal with the greatest care.

Personal data is processed in compliance with the Personal Data Management Regulations, and Tiama requires its employees to strictly comply with these rules.

The data regarding our sector of activity, our company and its products and services, are not intended to be made public except by Tiama services in charge of their promotion. Employees will pay particular attention to what they publish individually on social networks so as not to divulge confidential information.

Finally, Tiama scrupulously respects the Non-Disclosure Agreements which are signed regularly with their partners regarding the exchange of strategic information.

	REFERENCE	<b>CODE OF ETHICS</b>	Version A 01/06/22
	P1_DOC_004		Page 4 / 5

**PURPOSE OF THIS DOCUMENT:**

Ethics is everyone's responsibility. The rules and principles set out in this Charter therefore apply to all TIAMA employees (employees, service providers, trainees, work-study trainees, etc.).

Each employee must read this Charter, be committed to respect it in the context of their activities and comply with the laws and regulations in force.

This Code of Ethics is the reference document to help employees detect contentious situations, particularly in terms of corruption or conflict of interest in the daily activities of the company and to act appropriately in the event of confrontation with this type of situations.

Everyone must be able to anticipate the risks related to their functions and responsibilities.

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**ETHICS ALERT SYSTEM**

If you are in doubt as to the legality of a particular practice, or the interpretation of a situation, whether you have encountered the situation yourself, or are aware of it, you should report it to your manager, the human resources department or via the email address [alrteethique@tiama.com](mailto:alrteethique@tiama.com)

An investigation, internal or external, will be carried out.

The whistleblower, the information collected, and the people implicated will be covered by confidentiality.

The whistleblower cannot face reprisals in accordance with article 1132-3-3 of the labor code.

Anyone who obstructs the transmission of a report internally or to a competent authority is punishable by one year in prison and a fine of €15,000 (Sapin II law).

	REFERENCE	<b>CODE OF ETHICS</b>	Version A 01/06/22
	P1_DOC_004		Page 5 / 5

## Definitions and examples

### **Corruption:**

Bribery is giving, offering, or asking for something of value in exchange for an advantage that is illegal, unethical, or constitutes a breach of duty.

The most common forms of corruption are bribes (money, gifts, invitations paid in exchange for a service or benefit), money laundering (circulation of funds obtained illegally and attempts put in place to "wash" the money in question) etc.

#### Examples of corruption:

- Proposal from a salesperson to offer a gift to the purchasing manager of a client company to guarantee the renewal of a contract
- Invitation addressed to an engineer to obtain strategic information
- Gift offered to the IT manager to guarantee the renewal of a contract
- Proposal to award a contract in return for hiring a relative, etc.

### **Conflict of interest :**

A conflict of interest is a situation that arises when the independent, impartial, and objective exercise of the functions of a person is likely to be influenced by another public or private interest distinct from that which he must defend in these functions.

#### Examples of conflicts of interest:

- Family interest link likely to taint business secrecy
- Family interest link leading to preference for recruitment
- Link of interest between the instructing customer and a supplier
- Friendly link of interest leading to misappropriation of company accounts, etc.