

# BUILDING BUSINESS RELATIONSHIPS BASED ON TRUST

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## PREVENTING CORRUPTION



Corruption is defined as the intent to offer, give, propose or receive a payment of money or any other object of value for the purpose of influencing an action or a decision or of obtaining or keeping a contract in return. Each of us should be on the lookout and report any case of corruption or suspicion of corruption to his/her manager or *Compliance officer*.

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## GIFTS AND ENTERTAINMENT



Business gifts and invitations are tokens of courtesy which are received or given to a partner (gifts, meals, invitations to trade fairs, entertainment, trips, etc.). Even though customs vary from one country to another, there is a very clear rule to follow: exchanges of gifts should not influence business decisions. If in doubt do not hesitate to read our internal anti-corruption and gifts procedure available on the intranet.

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## BRIBERY AND IMPROPER PAYMENTS



These are unofficial payments paid to public officials to accelerate or guarantee the performance of administrative tasks (obtaining a visa, customs clearance, etc.). We should therefore ensure that our business partners do not make this kind of payment and we forbid ourselves from doing it.

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## CONFLICTS OF INTEREST



There is a conflict of interest when our personal interests interfere with the interests of CLS. Whether at work or in our free time, we should avoid doing anything that conflicts with our professional responsibilities.

We must be perfectly frank, and if in doubt, we ask for advice to our manager or the *Compliance officer*.

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## BUSINESS PARTNERS



The application of the Code of conduct implies a similar level of ethical standards from our business partners throughout the world. Thus, we monitor our agents, representatives, distributors conduct and actions, in order to detect any signs of illegal behaviour or acts which go against our business ethics.

# INSTRUCTIONS



## MAKE THE RIGHT DECISIONS



All employees are expected to become familiar with each of the standards listed in our Code and participate in its implementation whilst carrying out their duties. Any employee, any person or third-party may use the alert procedure provided for this purpose.

All employees are encouraged to seek guidance from Human Resources, *Compliance Officer* or their manager if they are unsure about what is the right thing to do.



## POCKET SIZE CODE OF CONDUCT

*Our commitment in terms of integrity and responsibility*



# WHY WE NEED A CODE OF CONDUCT?

1

*It is because we build the world we live in that we have a duty to conduct our business and our professional lives in an irreproachable way.*

*I would like all CLS employees and all our partners to work together to build a respectful and fair company.*

## A MESSAGE FROM CEO

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*This Code of Conduct, is the cornerstone of our programme for ethical behaviour and, is being implemented to ensure that the CLS group's fundamental values are an integral part of our everyday professional activities and our relationships with our colleagues, customers, suppliers, shareholders and all stakeholders.*

*Thank you for following our Code, living our values and acting in a responsible and ethical way.*

**Christophe Vassal,**  
CEO of CLS



## WHAT IS A CODE OF CONDUCT?



Our Code of Conduct lays down the principles, practices and policies we should apply when doing business. It formalises the responsible behaviour expected of all of us in our professional activities, no matter our job title, our geographical location or whether we are affiliated to CLS, an office or one of the Group's subsidiaries. The full version of the Code of Conduct is available online at: <https://www.cls.fr/commitments>

1

## RESPECTFUL WORKPLACE



**We are committed to:**

- fighting against any discrimination in respect of employment and occupation;
- fighting all forms of forced or mandatory labour and helping to abolish child labour by verifying in particular the practices of our suppliers, subcontractors and business partners;
- identifying and eliminating as quickly as possible any form of sexual or moral harassment or any kind of inappropriate behaviour, particularly the use of drugs or alcoholic beverages in the workplace.

2

## PROMOTING DIVERSITY



CLS strives to ensure equal opportunity for employment and career development based on objective criteria. In this respect, it prohibits all types of discrimination. Consequently, any discriminatory behaviour must be avoided and career related decisions should be made solely on merit.

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## PROTECTION



We are committed to respecting and protecting the personal data of our employees, customers, suppliers etc., in compliance with the law.

We protect CLS assets through the maintenance, management and responsible and efficient use of these assets (waste, theft prevention). We apply our IT Security Policy.

We protect, on a daily basis, the confidential or strategic data of our company.

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**For any questions about Compliance issue, please contact:**

[compliance@cls.fr](mailto:compliance@cls.fr)

<https://www.cls.fr/commitments>



**CLS**

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[WWW.CLS.FR](http://WWW.CLS.FR)