

Code of **B**usiness **E**thics



Industrial and CSR Department
Contact: Vignal Lighting Group - France

A message from our CEO

Our ethical principles

Over the years, the Group has acquired an indisputable reputation thanks to a rich culture based on integrity and ethical conduct.

Our relationship with all of our partners is based on this trust and this reputation.

The Group's management is keen to boost awareness of this commitment to ethical behaviour, among its teams and all other stakeholders. To this end, it has created resources such as the Code of Business Ethics to consolidate the Group's corporate culture and to strive for excellence.

This code is available to each of the staff and the stakeholders, and calls upon them to respect professional ethics expressed in the form of operational principles.

The Group is a value-generating company. Economic efficiency combined with our ethical principles are the best guarantee of creating long-term value.

Jean-Louis Coutin
Vignal Lighting Group CEO

I Confidentiality

The unauthorised divulgence of confidential information may adversely affect the Group. Each member of staff should ensure that all information which has not been made public, remains confidential.

Each staff member should:

- Limit the divulgence of confidential information to only those persons with a genuine "need to know",
- Securely store all confidential data,
- Prevent the divulgence of confidential information to persons outside the organisation,
- Avoid discussing or working on confidential information in public places.

All documents, regardless of their nature and medium, are confidential and remain the Group's property.

II The declaration of conflicts of interest

The group expects and requires that its staff should dedicate themselves to their work and should avoid engaging in commercial, financial or real estate activities which may conflict with the interests of the Group.

In situations in which a risk of a conflict of interests is identified, or if in any doubt, the staff member in question should consult his hierarchical superior or the Administrative and Financial Manager before taking any decision.

It is important for each staff member to ensure compliance with the Code of Business Ethics in his day-to-day activities, for his own personal interests and those of the Group.

III Asset use

The Group is keen to preserve its tangible and intangible assets.

Assets include workplace tools, systems and equipment, documents and various facilities in addition to other intangible assets such as information, knowledge, patents and brands, etc.

Staff may not use the Group's assets for personal reasons, unless authorised to do so beforehand. Taking physical items off-site without authorisation is strictly prohibited.

The communication systems and resources are reserved for professional use only.

IV Political activities and associations

The Group pays no funds and supplies no services to promote the interests of political parties with the aim of obtaining favourable treatment from an administrative or governmental authority.

Furthermore, no staff member is authorised to commit the Group to any form of support activities.

However, the Group respects the right of each of its staff to hold their own opinions. To this end, each staff member is free to join a political party or any association of his or her choice.

V Lobbying / The fight against corruption

Each staff member must avoid obtaining any undue political or regulatory benefit from the public authorities, and must act with the utmost integrity in all dealings with representatives of public bodies.

The Group will make every effort to combat corruption in all its forms in every country in which its companies are based.

Each staff member undertakes that he or she will not promise, grant or demand illicit payments or any other benefits to obtain or maintain a contract, or any other illegitimate benefit, and moreover will not engage in extortion, commit fraud or accept bribes.

In the course of their business relationships, staff will not grant or accept acts of accommodation, favours or monetary or other benefits. The promise or giving of free gifts or services are prohibited unless these are acts of courtesy or hospitality.

VI The fight against money laundering

The Group displays utmost vigilance concerning all financial transactions in order to detect any irregularities.

The group is actively involved in the fight against money laundering, which involves recycling funds from illegal activities via business transactions (countermeasures include the verification of the country of origin of funds and the location of the bank in addition to checking that it is not included on a blacklist, etc.).

VII The fight against anti-competitive practices

The group makes every effort to avoid anti-competitive practices, participation in cartels and/or abuses of dominant positions.

The group agrees that it will not share sensitive information with the market (customer databases, marketing plans, business strategies, sales and purchase prices, etc.).

The companies are also invited to familiarise themselves with the legal and statutory requirements regarding competition in their country and to consult a professional in this field whenever necessary.

VIII The use of social networks

Staff are invited to be highly attentive to the manner in which they express themselves in the social media, in order to ensure that anyone reading their posts will immediately understand whether they are speaking in their own name or in their professional capacity.

In all circumstances, when expressing their opinions, the staff will avoid adversely affecting the Group's image, including when using social networks for personal purposes.

IV Further information

iv. 1) How can I know when a situation poses an ethical problem?

Ask yourself the following questions:

Is this decision illegal? Does it conflict with the Group's interests? Does it have a negative impact upon those involved? What effect would it have if it was mentioned in the press?

It is the first-line supervisors' responsibility to help staff solve the difficulties with which they may find themselves confronted.

iv. 2) Procedure to be followed in the event of non-compliance with the code of ethics

In the event of doubts when faced with a situation likely to constitute a violation of this code, each staff member is invited to contact his first-line supervisor or the Administrative and Financial Manager to discuss this.