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*Francis Charles*  
*Oberthur*



**CODE  
OF ETHICS**

*Oberthur*  
■ ■ ■ ■ ■ Fiduciaire

**VHP**  
■ ■ ■ ■ ■ SECURITY PAPER

**OF** oberthur  
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**Contents**

I. Message from the Chairman ..... 4

II. A Group with values ..... 5

III. A Group that complies with the laws in force ..... 6

IV. A Group that respects fellow Human Beings ..... 6

V. A Group that is committed to sustainable products and services  
and acts to reduce its environmental impact .....7

VI. A Group that acts with integrity ..... 8

VII. A Group that respects its clients and suppliers ..... 10

VIII. A Group that protects personal data ..... 10

IX. Contacts ..... 11

## I. Message from the Chairman

The François-Charles Oberthur Group is today one of the 3 world leaders in security printing.

Our management practices are directly inspired by our 5 core values: Expertise, Trust, Innovation, Respect, Integrity. These values guide all our actions on a daily basis and are at the heart of our relationship with all our stakeholders: clients, employees, shareholders, suppliers, competitors, partners, public authorities, associations etc.

In an increasingly global and complex environment, it is essential that we have a Code of Ethics based on our values and the Global Compact's Sustainable Development Goals. Our Code of Ethics is a framework for our actions and our choices, and sets out the rules of conduct, both individual and collective, to bring our values and commitments to life on a daily basis.

We all have to act responsibly wherever we are, whatever we do, regardless of our position in the company by applying and adhering to the rules of our Code of Ethics.

We are all ambassadors of the François-Charles Oberthur Group and we must contribute, through our behaviour, to the integrity and reputation of the Group.

I know I can count on you to do this.

**Thomas Savare**

A handwritten signature in black ink, appearing to read 'Thomas Savare'.

## II. A Group with values

### 01

#### Expertise

Oberthur Fiduciaire is one of the world's leading high security printers

### 02

#### Trust

Trusted partner and global security expert, serving clients since 1842

### 03

#### Innovation

Oberthur Fiduciaire continually strives to continuously improve product quality and traceability

### 04

#### Respect

We value our clients and employees. By promoting diversity within our workforce, we seek and benefit from a variety of perspectives, abilities and know-how. We strive to create rewarding relationships and partnerships, and we treat everyone in accordance with our values

### 05

#### Integrity

We set ourselves high goals with respect to performance and ethical behaviour. We inspire confidence by expressing our intentions, practising what we preach and taking responsibility for what we do

### **III. A Group that complies with the laws in force**

We respect all international, national and local laws in every country in which we operate, including those relating to employment rights, health and safety, the environment and anti-corruption.

### **IV. A Group that respects fellow Human Beings**

We are all responsible for promoting and respecting international Human Rights law in our sphere of influence.

The François-Charles Oberthur Group respects Human Rights. We oppose any discrimination based on race, colour, gender, age, sexual identity, language, disability, religion, political or other beliefs, national or social origin or any other status.

The François-Charles Oberthur Group bans all forms of forced labour or child labour.

The François-Charles Oberthur Group strives to promote well-being at work, gender equality at work, diversity and the right to work for everyone in all its entities, focusing its CSR policy on skills and performance.

Human dignity must be respected at all times. Any behaviour or actions that contravene this right, including any form of moral or sexual harassment, is contrary to our values and prohibited.

The François-Charles Oberthur Group implements a programme to prevent harassment and improve working conditions, co-created with employee representative bodies to guarantee and improve the safety, physical and mental health of its employees.

## **V. A Group that is committed to sustainable products and services and acts to reduce its environmental impact**

The François-Charles Oberthur Group has always been committed to improving its procedures and products while constantly being mindful of its impact on the environment, its clients and employees, communities, family shareholders and suppliers.

The Group has been committed to Corporate Social Responsibility for many years, and this concept is an integral part of its economic model with the «Earth 365» programme.

The «Earth 365» programme is deployed at the heart of our strategic objectives, at all levels and for all roles within the company.

As part of this programme, we inform and share with our clients and other stakeholders our goals, achievements and progress with respect to sustainable development. We are convinced that in this way, step by step, we are helping to promote ecological transition and sustainable behaviour change.

The François-Charles Oberthur Group's climate strategy is based on a scientific framework and sets specific objectives with respect to its production chain.

After monitoring the carbon footprint of our products, and with the help of life cycle analysis and ecodesign, we now use new more environmentally friendly substrates, products, services and associated recycling solutions for end-of-life products.

This ensures that our products are designed and manufactured in an environmentally friendly manner throughout the entire production process.

We seek to reduce our environmental footprint throughout the life cycle of our products in partnership with our clients and suppliers and in our everyday behaviour in all aspects of our business.

Our goal is to always offer our customers competitive, innovative and sustainable products and services by acting ethically and transparently.

Employees of the François-Charles Oberthur Group must be mindful that socially responsible and environmentally friendly behaviour is also a key success factor.

## **VI. A Group that acts with integrity**

Over time, the François-Charles Oberthur Group has acquired a global reputation for integrity and excellence, which has earned it the trust of its clients and partners. We take a zero tolerance approach to fraud in all its forms, particularly corruption, influence peddling or breaches of competition law.

### **• Fight against all forms of corruption and influence peddling**

The François-Charles Oberthur Group has adopted a zero tolerance policy enshrined in its Code of Conduct to all forms of corruption and other breaches of probity and undertakes to act with honesty, fairness and integrity, in all its activities and business relationships, everywhere.

The François-Charles Oberthur Group ensures that all anti-corruption laws in force are complied with in all the jurisdictions in which the Group operates.

It is strictly forbidden for employees of the François-Charles Oberthur Group to engage in corrupt practices in any way that infringes the values of probity and integrity promoted by the Group and in particular that might be described as corruption, influence peddling, favouritism, embezzlement of public funds or illegal taking of interest.

- **Compliance with competition law**

The François-Charles Oberthur Group undertakes to refrain from any act that by its nature distorts competition rules and to treat all its clients, competitors and partners fairly. It ensures that neither its employees nor its partners enter into an agreement, arrangement or concerted practice that would contravene laws and regulations and constitute an anti-competitive practice.

The François-Charles Oberthur Group also attaches great importance to the way information is exchanged with third parties and does not exchange, directly or indirectly, any sensitive commercial information with its competitors (e.g. prices, margins, volumes, R&D projects etc.), except to the extent that such exchanges would be strictly within the framework of applicable laws and regulations.

The François-Charles Oberthur Group does not practice price fixing, unlawful agreements with respect to procedures for awarding contracts, market sharing, sources of supply, collusion in public procurement, tacit collusion with its competitors or the exclusion of any supplier or client in breach of competition law.

## **VII. A Group that respects its clients and suppliers**

We act ethically, fairly and professionally in our relationships with all market players. We are committed to complying with all applicable specifications and standards for the design, manufacture and marketing of our products.

We continually strive to continuously improve the quality and traceability of our materials and products, adapting to the ever-changing environment of our clients. We do everything possible to have a «win-win» partnership with our suppliers. They are chosen fairly with regard to their offer and their ability to respect our ethical principles, without any form of favouritism. Once selected, they are subject to regular monitoring and exchanges to ensure service efficiency.

## **VIII. A Group that protects personal data**

The François-Charles Oberthur Group attaches great importance to respecting the privacy of each and every individual and protecting personal data.

We have formalised our commitments in this regard as part of our Privacy Policy and we strive to collect only personal data that is strictly necessary for the proper functioning of our business or required by law. For example, we do not collect information about health status, ethnic or social origin, sexual preference, political or trade union opinions, extra-professional activities and commitments, or religious beliefs.

The individuals from whom we collect personal data are informed of the type of information collected and the use made of it. The François-Charles Oberthur Group ensures that data is safely stored and undertakes to keep it only for the necessary period for the legal or professional purpose for which it has been collected.

## IX. Contacts

The François-Charles Oberthur Group Code of Ethics is intended to provide clear guidance but it cannot address all potential scenarios or questions.

Any employee who, in good faith, seeks advice, raises an issue or reports conduct that appears to be unethical acts in accordance with the spirit of this Code. They can do so safe in the knowledge that the François-Charles Oberthur Group will not tolerate any act of retaliation against them.

The Ethics Committee, led by our Chairman Thomas Savare, is responsible for ensuring that our Code of Ethics is implemented. He ensures that our commitment with respect to compliance and corporate social responsibility is consistent while improving our policies and procedures by identifying best practices.

The Ethics Committee ensures that our Code of Ethics is understood by, disseminated to and applied by all our stakeholders with the use of assessments and controls. It also plays an active role in listening and providing support and advice.

The Ethics Committee can be contacted for the following reasons:

- to ask a question, seek advice, submit a proposal relating to the application of or compliance with the Code of Ethics,
- to report any fact that poses serious risks in relation to corruption, fraud, anti-competitive practices, discrimination, workplace harassment, health and safety at work and environmental protection.

After assessing the situation, the Ethics Committee may conduct an internal investigation..

When faced with an ethical issue, we need to ask ourselves these questions:

- Has the law been broken?
- Does the situation comply with the François-Charles Oberthur Group's values and Code of Ethics?
- Am I comfortable talking to my colleagues about it?

If we answer any of these questions in the negative, or if we have any doubt about what to do, we must discuss the matter with one of our three Ethics Officers:

- our line manager (first point of contact if possible),
- our Human Resources Manager,
- or a member of the Ethics Committee.



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or

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