



Code of Conduct

Version 1.0

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Dear employees, dear partners

Because of its core values (respect, humility, team spirit, agility, commitment) and the project it is developing, the PICOT Group is very sensitive to ethical issues.

These values, shared by all our employees, have been a key factor in the success of the PICOT Group, which has become one of the French and European leaders in perimeter protection.

With the adoption of this Code of Conduct, we wish to exercise our social responsibility by reinforcing the prevention of corruption.

Compliance with the anti-corruption rules is also essential for the PICOT Group, since any violation of these rules would likely affect the brand image acquired by our customers and stakeholders, and would expose us to civil and criminal prosecution. In this regard, the PICOT Group expects its managers, employees and stakeholders to comply with this Code of Conduct.

Each of us must act in a responsible and exemplary manner, both individually and collectively, within our Group and with all our stakeholders.

In the context of our industrial and commercial activities, the principles of ethics and integrity set forth in this Code of Conduct are more than a guide; they are the true pillars of our behavior toward our customers, suppliers and partners.

The Board of Directors fully endorses this Code of Conduct and the actions taken by executive management to ensure the highest standards of ethics and compliance.

We strongly encourage our directors and managers to lead by example and ensure that this Code is properly understood and applied by all employees of the Group. The PICOT Group expects its business partners to adhere to the same principles.

To this aim, we invite all stakeholders to be familiar with our Code of Conduct and practice it in their daily activities.

We count on your individual and collective commitment.

*Wim Deblauwe
President of the Board of Directors*

*Grégory Lepage
Chief Executive Officer*

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Introduction and Scope

The PICOT Group (PICOT SAS and all of its direct or indirect subsidiaries) is committed to conducting business according to the highest ethical and moral standards, and in compliance with all applicable laws and regulations in force in each country in which it operates. While pursuing this commitment, the PICOT Group has also always aimed at perpetuating the values that have enabled it to become a market leader:

- Providing customers with the best engineering and product quality, while ensuring long term sustainability;
- Perpetuating strong founding values, including with respect to high quality standards, a passion for a job well done, respect for all stakeholders, and corporate social responsibility; and
- Developing and promoting local talent.

This Code of Conduct is designed at describing the key principles, values and practices to which the PICOT Group is committed to adhere. The Code of Conduct is a reference document for all Company directors, managers and employees worldwide, who are required to strictly abide by it. Internally, ignorance of the Code of Conduct is no excuse. All directors and managers are responsible for disseminating the Code of Conduct and ensure that it is being understood and applied effectively.

The Code of Conduct also applies to external stakeholders worldwide, setting forth our expectations regarding their behavior and ethical standards. They are expected to apply standards equivalent to PICOT's, particularly with respect to employees, and remedy any shortcomings.

Suppliers are specifically required to commit to and abide by the Sustainable Purchasing Charter, which is an integral part of the Compliance Program of the PICOT Group.

Ethical Standards

The PICOT Group is strongly committed to ensuring the highest standards with respect to ethics, honesty, integrity, fairness, transparency and impartiality, and expects the same commitment from all internal and external stakeholders.



In no circumstances, the pursuit of a Company's interest may justify improper or unlawful behavior. As such, the PICOT Group will not hesitate to terminate business or employment relationships with anyone undertaking any behavior contrary with the commitments set forth in this Code of Conduct.

1. COMPLIANCE WITH LAWS & REGULATIONS

a. Compliance with Laws and Regulations

The PICOT Group is strongly committed to fully complying with all laws and regulations that apply to its operations worldwide, as well as with relevant social and environmental standards, and expects the same commitment from all internal and external stakeholders. Failure to comply with applicable laws and regulations can expose the Group, as well as its directors, managers and employees, to legal actions, including from a criminal standpoint.

Should relevant laws or regulations establish standards more stringent than those established in this Code of Conduct, then such standards should prevail. Conversely, should the Code of Conduct set forth higher standards, the latter should prevail.

In addition to the laws and regulations which apply to its operations, PICOT has adopted and implemented internal policies, procedures, guidelines and rules governing its day-to-day activities, which all directors, managers and employees are required to comply with. Any breach or instance of non-compliance of applicable laws and regulations, as well as of internal policies, procedures, guidelines and rules, may result in disciplinary actions, up to and including dismissal.

b. Anti-Bribery and Corruption



The PICOT Group has a zero-tolerance policy with respect to all forms of corruption and influence peddling, as defined in the Glossary.

All internal and external stakeholders are **strictly prohibited from offering or paying, seeking or accepting, directly or indirectly, any kind of benefits, and from exercising unlawful pressure, in order to obtain or retain any undue advantage.** The PICOT Group's Compliance Program illustrates the types of behavior that are prohibited, and which might qualify as corruption or influence peddling. Relevant behavior include:

- Paying or accepting bribes or hidden commissions, regardless of whether they are paid directly or indirectly; and
- Facilitating payments (payment of small sums to public officials in order to speed or guarantee the execution of an action as part of the normal conduct of business).

More broadly, any payment to a third party must be in exchange for a service and correspond to a legitimate agreed upon price.

Examples of high-risk situations:



- *Offering an all-expenses-paid vacation by a supplier to an employee with whom the supplier would otherwise be negotiating: the supplier would be guilty of active bribery, and the employee who accepted would be guilty of passive bribery.*
- *Offering a supplier a ticket to a trade show to obtain favorable pricing..*
- *Offering a dinner at a star restaurant to a public official to give him access to his address book.*

All employees are invited to review our Compliance Program to ensure that they are abiding by its principles at all times.

c. Money Laundering

The PICOT Group strongly condemns money laundering practices and is committed to comply with all applicable laws and regulations designed at fighting such practices.

If anything about a transaction seems suspicious or inappropriate, or if you believe that a transaction could violate applicable anti-money laundering laws or regulations, please bring the issue to the attention of your manager or the Group General Counsel or the Group Compliance Officer.

d. Antitrust and Fair Competition

Competition law ensures that companies compete fairly in the market. The PICOT Group is committed to comply with all applicable competition laws and regulations in force in the countries in which the Company operates. As such, all internal and external stakeholders must refrain from practices that are in breach of competition laws and regulations, including with respect to being involved, both personally or through third parties, in concerted practices or unlawful agreements through understandings, plans, arrangements or coordinated behavior between competitors, in particular concerning prices, markets, market shares or customers.

e. Economic Sanctions and Export Controls

The PICOT Group attaches great importance to respecting international agreements, as well as applicable laws and regulations concerning economic sanctions and export controls, for countries where the Company does business. No transactions with direct or indirect links to states, entities, organizations or persons subject to international sanctions, regardless of their size, may be executed if they fail to respect existing sanctions programs.

f. Data Privacy

The PICOT Group is committed to take the necessary steps to ensure that personal data is handled appropriately and in compliance with applicable data protection laws and regulations, and relevant Company policies, procedures and instructions. No personal information will be communicated or distributed to third parties without the prior consent of the interested party, unless necessary and permitted by law.

g. Confidentiality

Each employee is responsible for maintaining the confidentiality of the information entrusted to him or her.

Information that constitutes commercially sensitive information, business or industrial secrets, or personal data, needs to be particularly protected.



Information freely accessible to the public is not considered as confidential information, providing that its disclosure is not the result of a breach of a confidentiality obligation.

The PICOT Group ensures the confidentiality of any such information and refrains from seeking confidential data, unless the communication has been duly authorized and takes place in compliance with applicable law and regulations. Every employee must take the necessary measures to ensure the confidentiality of the information to which they have access in the context of their professional activities, or the activities of those working under their responsibility. PICOT's business partners cannot process the PICOT Group's confidential information in a way different than the one specifically authorized by the PICOT Group.

h. Property Rights

All employees have the responsibility to protect the PICOT Group's property and assets. This includes tangible items, such as company funds, supplies and IT equipment, and intangible items, such as intellectual property (including patents, trademarks, and trade secrets), networks and know-how that employees develop or have access to in the course of their work for the PICOT Group. At all times, employees must take steps to protect the PICOT Group's property and assets, including by avoiding public discussions involving proprietary or sensitive information, and protecting relevant assets from damage, mistreatment and theft.

The PICOT Group is also strongly committed to upholding the rights of third parties by respecting and safeguarding their physical and intellectual property and assets. In this respect, the PICOT Group will not engage in any activities that involve the unauthorized use, reproduction, distribution, or modification of third-party property or intellectual property and assets without their explicit consent. In this respect, any use of an intellectual property assets must strictly comply with the authorization limits granted by the holder of the rights.

i. Company Image and Reputation

All employees have a duty to protect the Company's image and reputation in all situations. In this respect, all communication that could impact the PICOT Group's image or reputation must be carefully reviewed and controlled. In this respect, the principles of professionalism, competence, availability, respect and fairness must be strictly followed.

All statements to the media or responses to relevant inquiries must be coordinated with and handled by the PICOT Group. If you are representing the PICOT Group externally you should seek prior approval before making any statements in this respect.

Employees must use caution when sharing company information through internal or external social media channels. In this respect, they should not share information that is confidential, proprietary, insulting, offensive or demeaning to employees, the PICOT Group or any external stakeholders. They should also make sure to respect data privacy rules and regulations when posting pictures of individuals or groups.

j. IT Chart

The PICOT Group's IT resources must be used responsibly and only for legitimate purposes.

All Company IT equipment (including, but not limited to, computers, networks, printers, email and phones) are the property of the PICOT Group and are to be used for professional purposes, in line with the requirements established in the PICOT Group's IT Chart. Personal use of such devices is permitted, although it should be limited to what is reasonable and necessary under the circumstances and must not interfere with relevant professional duties.

In order to promote transparency, as well as a responsible and safe use of its IT and communication systems and equipment, the PICOT Group has adopted an IT Chart on the proper use of such systems and equipment. We invite all employees to read and familiarize themselves with the IT Chart and apply it in their daily activities.

2. BUSINESS PARTNERS

a. Relations with Business Partners

The PICOT Group values the relationships with external business partners, such as suppliers, contractors and consultants. The PICOT Group's ambition is to collaborate with the best suppliers in the market to combine service, quality and cost control by offering innovative solutions. Suppliers are specifically required to commit to and abide by the Sustainable Purchasing Charter, which is an integral part of the PICOT Group' Compliance Program.

The PICOT Group is also committed to providing its customers with high quality products and services, while ensuring efficiency, growth, innovation and sustainability. Anyone involved with contract negotiation or customer projects must ensure that statements, communications, and presentations made to customers are truthful and accurate. All employees have an obligation to protect sensitive and confidential customer information.

As a result of the PICOT Group's commitments, it is forbidden to establish and maintain relationships with third parties that, *inter alia*, (i) are involved in illegal activities, (ii) do not have the requested commercial skills, integrity and reliability, (iii) prevent human development and do not respect the human or labor rights of individuals.

Compliance with the rules and principles set forth in this Code of Conduct and the Sustainable Purchasing Charter is a prerequisite for the establishment and continuation of any commercial relationships with the PICOT Group's business partners. Non-compliance may therefore result in the non-establishment or termination of the business relationship with such partners, as well as in legal actions under applications regulations.

b. Donations, Contributions and Sponsorships

Donations, contributions and sponsorships should never be made with a corrupt intent, must always comply with all applicable laws and regulations, as well as with the PICOT Group's policies and procedures, and should be made solely to well-known and reputable organizations or beneficiaries.



Any decision to involve the PICOT Group in donations or sponsorship activities is subject to the prior approval of the director of the company concerned and requires the signature of a contract validated by the Legal Department.

c. Conflicts of Interest

Conflicts of interest may arise when the personal interests of a director, manager or employee (or of a third party with which the director, manager or employee has a close relationship) conflict or could potentially conflict with the interests of the PICOT Group and could compromise or give the appearance that this relationship might compromise the impartial and objective exercise of the duties of the director, manager or employee.

The following constitute examples of situations that can create a conflict of interest:

- *Holding an interest in a third party that happens to be a client, competitor or supplier of PICOT (or that solicits to become one), whenever this connection can impact a decision-making process;*
- *Having family ties with another employee of the Group or of a company in connection with the Group, whenever these ties can impact a decision-making process; or*
- *Having a close relationship with a supplier having submitted a bid in response to a call for tender and being part of the selection process.*

All directors, managers and employees must avoid all situations that constitute or might constitute a conflict of interest and that can jeopardize their impartiality and ethical behavior.

Directors, managers and employees finding themselves in a situation entailing an actual or potential conflict of interest are required to report it to their line manager or to the Group General Counsel or the Group Compliance Officer. If reported to the line manager, he/she shall subsequently communicate the actual or potential conflict of interest to the Group General Counsel or the Group Compliance Officer. Any such situations will be subsequently dealt with by the Group Compliance Committee, who will determine the required mitigation measures, as appropriate.

d. Gifts and Invitations

While nominal gifts and standard invitations are a normal part of conducting business, employees must be careful not to provide or accept gifts or invitations that may be perceived as excessive or that appear as designed to influence decision-making, as such benefits could be interpreted as bribes.

Any gifts or invitations can be allowed only if they also meet the following general rules:

- (i) be reasonable and appropriate to the occasion or circumstances;
- (ii) be legal in the countries of both the offeror and the recipient;
- (iii) be made openly and transparently; and
- (iv) respect the threshold rules.

All applicable rules and conditions are detailed in a specific policy of the Group Compliance Program.

Any payment or reimbursement of travel expenses must have a legitimate business purpose and not just be for the receiver's enjoyment.

Regardless of the amount at stake, it is forbidden to offer or accept the free use of equipment or other items of value, personal discounts, cash, stocks, shares, and equities, as well as commercially unjustified free services (such as insurance, repair or improvements works). Moreover, the offer or acceptance of gifts and invitations by employees involved in procurement activities is forbidden at any time during relevant tender or procurement processes.

3. EMPLOYEES

a. Human Rights and Fundamental Freedoms

The PICOT Group is committed to protect human rights and promote the fair and respectful treatments of individuals within the Group and its supply chains. In this respect, the PICOT Group is committed to, *inter alia*, eliminate all forms of illegal, forced or compulsory labor (including child labor), pay particular attention to categories of workers subject to exploitation (in particular migrants if any), by ensuring their discrimination-free recruitment and employment practices, freedom of movement and remuneration, and prohibit any type of work which, by its nature or the conditions in which it is conducted, may compromise health, safety, integrity or morality.

Additional commitments relevant to the PICOT Group's engagement to foster human rights and fundamental freedoms are detailed in the following paragraphs.

b. Work Environment

As part of its commitments, the PICOT Group aims at fully upholding social rights and foster dialogue with employees, while promoting value, well-being and the development of internal resources. In this respect, the Company is committed to comply with applicable labor and trade union regulations (fully respecting the right of all employees to participate in trade unions and workers' organizations, and bargain collectively), while protecting the health and safety of employees and other stakeholders. Internal authority and supervision shall be exercised with equity and fairness, any behavior that could damage employee's dignity being expressly prohibited.

c. Equal Opportunities and Non-Discrimination

The PICOT Group is committed to offer equal employment opportunities to all qualified employees and applicants, to give everyone the opportunity to contribute and achieve success. As such, applications for employment should be solely evaluated based on matching candidate profiles with relevant needs and business requirements.

The PICOT Group also undertakes to value, encourage, support and embed a diverse workforce and inclusive workplace for all employees. Employment decisions, including hiring, performance evaluation, promotion, compensation, and development will be made solely on the basis of objective factors including merit, qualifications, performance and other business considerations.

Any kind of discrimination with respect to, *inter alia*, age, race, gender, ethnic origin, nationality, religion, health, disability, marital status, sexual orientation, political beliefs, or trade union membership will not be tolerated by the Company.

d. No Harassment or Violence

The PICOT Group aims at protecting the moral integrity of employees by guaranteeing their right to work in an environment that fully respects human dignity. As a result, acts of physical or psychological violence, sexual harassment or any other behavior that is harmful to an individual, his or her beliefs, dignity and preferences will not be tolerated by the Company.

Employees and other stakeholders who believe that they have been subjected to discrimination, harassment or violence should not hesitate to report relevant facts according to the Group Whistleblowing Policy, so that relevant allegations can be properly evaluated internally.

e. Health and Safety

The health and safety of all employees is a top priority to us. As such, the PICOT Group is fully committed to complying with all applicable occupational health and safety regulations and industry standards. To achieve this objective, the PICOT Group strongly supports the promotion of a culture

of safety and health at work by implementing prevention, information and training initiatives, and fostering responsible behavior by all business partners.

4. ENVIRONMENTAL PROTECTION

The PICOT Group recognizes the importance of protecting the environment and takes ecological impacts into account in all its commercial decisions, in order to contribute to the sustainable development of the territories in which it operates through targeted actions. In this respect, the PICOT Group is committed to comply with all applicable environmental laws and regulations, including with respect to pollution, waste management and energy consumption.

As part of its commitment to promote economic development and value creation while fostering sustainability, the PICOT Group regularly liaises with relevant stakeholders to, *inter alia*, improve sustainability performance and reduce the environmental impact of its products. All employees have a responsibility to contribute achieving these goals through their own conduct.

5. GROUP'S ACTIONS

a. Group's Measures & Controls

In order to ensure compliance with applicable anticorruption regulations, the PICOT Group implements specific measures and controls designed at preventing, identifying and sanction any instances of corruption or influence peddling within its operations. In this respect, the PICOT Group has developed and implemented a Compliance Program, which is based on the following key features:

- Establishment of a dedicated compliance organization, comprising a Group Compliance Committee and a Compliance Officer;
- Performance of a risk mapping designed at identifying and mitigating relevant risks corruption and influence peddling;
- Adoption of dedicated policies and procedures designed at preventing instances of corruption and influence peddling;
- Effective communication of, and periodic training on, PICOT's Compliance Program;
- Adoption and implementation of a Third-Party Due Diligence procedure pertaining to the retention and oversight of relevant external stakeholders;
- Implementation of a system of internal accounting controls designed to ensure that the PICOT Group makes and keeps fair and accurate books, records, and accounts; and
- Strong support and commitment of the Company's directors and managers with respect to the PICOT Group's zero-tolerance policy with respect to all forms of corruption and influence peddling.

b. Whistleblower Protection

In line with its ethical commitment, the engagements set forth in its Code of Conduct, and its commitment to encourage an open dialogue with relevant stakeholders, the PICOT Group has adopted a Whistleblowing Policy designed to provide an avenue for employees and other relevant stakeholders, to raise, confidentially and anonymously if desired, concerns or report any known or potential misconduct, violation of the Code of Conduct, other Company policies and procedures, or applicable laws and regulations, free of any retaliation, discrimination, or harassment.

Whether you are an employee, an officer or director, an independent contractor or a business partner, the PICOT Group asks you bring to light good faith concerns regarding its business practices by submitting relevant reports online via the Whistleblower Software ethics and reporting tool

(<https://whistleblowersoftware.com/secure/9b551e9e-1dde-43b2-b83c-ac143bdcc56d/channel-select>).

While the Company encourages employees to submit alerts via the Whistleblower Software tool, employees could also submit reports via one of the following reporting channels:

- Via email to the Group General Counsel (legal.compliance@picot-group.com); or
- Via email to the Group Human Resources Director (hr.compliance@picot-group.com).

The Company is committed to take all appropriate measures to protect individuals submitting a report in good faith, as well as all individuals that assisted them. Submitting, knowingly and deliberately, false reports or reports containing false statements, disclosing misleading information or acting in bad faith under the Whistleblowing Policy may result in disciplinary actions or legal proceedings in accordance with applicable laws.

For further details as to how to make a report or the protection afforded to reporting individuals, please refer to the Group Whistleblowing Policy, which also describes the internal processes for evaluating and investigating reports.

c. Disciplinary Actions

Compliance with the rules and principles set forth in this Code of Conduct is an integral part of any employment or business relationship involving the Group.

Failure by employees to comply with such rules and principles, with relevant legal and regulatory obligations, or the rules set forth in the Code of Conduct may result in the application of disciplinary sanctions in accordance with applicable regulations.

d. Continuous Improvement

This Code must be complied with by all relevant stakeholders and shall be brought to their attention by all appropriate means, including through training and other initiatives designed at raising their awareness. It is the responsibility of each employee to familiarize himself/herself with this Code of Conduct and consult their line managers for any clarification regarding the interpretation or application of the rules and principles established in this Code of Conduct.

The PICOT Group is committed to regularly reviewing and updating this Code of Conduct whenever necessary, to correct or enhance its content, or align with evolving legal or ethical standards and business practices.

e. Contact

If you have any questions or requests regarding this Code of Conduct, please do not hesitate to contact the Group General Counsel or the Group Compliance Officer (legal.compliance@picot-group.com).

* * *

Glossary

Corruption, the definition of which varies depending upon the applicable legal framework, generally includes any act through which a person solicits or accepts a gift, a promise or any sort of benefit for themselves or for a third party, in exchange for performing, failing to perform or delaying the performance of an action within the scope of their responsibilities, duties or mandates, to the benefit of a third party. Relevant benefits may consist of direct benefits (such as cash, goods or services, discounts, free execution of work) or indirect benefits (such as hiring a relative or friend, paying a debt for someone). Corruption may involve a person acting in a private capacity (private corruption) or in a public capacity (public corruption).

Influence peddling, the definition of which also varies depending upon the applicable legal framework, generally applies to a situation in which a person illicitly uses their real or supposed influence in order to obtain certifications, employment, contracts or any other favorable decision for a third party from a public authority or administrative office in exchange for a benefit.

Confidential information is considered to be information or data related or belonging to a natural or legal person, for which communication and/or use is limited and/or prohibited by law or by contract. Confidential information can be of any kind, such as :

- Unpublished corporate strategy;
- Current or future research and development programs, technological innovations, advanced technology, inventions, planned mergers or acquisitions, investments or divestments;
- Information received from customers or partners, such as their development plans/models or any other type of information for which communication has not been explicitly authorized;
- The existence and details of ongoing negotiations with partners or customers;
- Financial information (actual or provisional data) prior to its publication.

Personal data is defined as any information relating to an identified or identifiable natural person (« data subject »). Any identifiable person

is a person who can be identified, directly or indirectly. When a person is not identifiable, the data is said to be anonymous. The protection of personal data is governed by laws which, if breached, may constitute a criminal offense.

Discrimination aims to place people at a disadvantage for reasons prohibited by law, on the basis of their origin, sex, family situation, pregnancy, physical appearance, particular vulnerability resulting from their economic situation, apparent or known to the perpetrator, surname, place of residence, state of health, loss of autonomy, disability, genetic characteristics, morals, sexual orientation, gender identity, age, political opinions, trade union activities, ability to express oneself in a language other than French, membership or non-membership, real or supposed, to a specific ethnic group, nation, alleged race or religion.

Child labor concerns any work that deprives children of their childhood, their potential and their dignity, and is harmful to their physical and mental development. The term is defined by the ILO Convention concerning Minimum Age for Admission to Employment, 1973 (No 138) and the Worst Forms of Child Labor Convention, 1999 (No 182), as well as by the United Nations Convention on the Rights of the Child.

Forced labor, is defined by the ILO Forced Labor Convention, UN, 1930 (n°29), and includes any work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.

Money-laundering is the processing of criminal proceeds to disguise their illegal origin and make them look legitimate.

Moral harassment is the repeated use of comments or behavior with the purpose or effect of degrading working conditions of another person, likely to infringe their rights and dignity, alter their physical or mental health or compromise their professional future. It is a criminal offence.

Sexual harassment is the repeated use of sexual or sexist language or behavior that violates a person's dignity by being degrading or humiliating. It can take place on or off the job. This is criminal offence.

Main reference texts

The **United Nations Convention against Corruption** is an international treaty established by the UN and adopted on October 31, 2003. It organizes a body of standards, rules and measures available to signatories to reinforce their anti-corruption regime.

The **US Foreign Corrupt Practices Act (FCPA)**, enacted in 1977, generally prohibits the payment of bribes to foreign officials to help them obtain or retain business, subject to criminal and civil penalties.

The **2010 UK Bribery Act** creates a new offence under its Section 7, which can be committed by commercial organizations that fail to prevent their associates from bribing another person on their behalf. An organization which can prove that it has adequate procedures in place to prevent its associates from paying bribes will be able to defend itself against the offence set out in section 7.

The **law for transparency, action against corruption, and the modernization of economic life ("Sapin 2"** Law of December 9, 2016) (France) provides for the implementation of various internal mechanisms to prevent corruption in companies and government agencies, overseen by a new structure, the French Anti-Corruption Agency ("AFA"), which is also responsible for administrative coordination in this area and has the power to impose administrative sanctions.

Conventions of the International Labor Organization (ILO) include freedom of association, the right to collective bargaining, the abolition of forced labor, the elimination of worst forms of child labor and the elimination of discrimination.

The **OECD convention on combating bribery of foreign public officials in international business transactions**, adopted in 1997, establishes standards, making bribery of foreign public officials in international business transactions a criminal offence. It also includes guidelines for multinational companies on how to implement its provisions.

The **Organization for Economic Co-operation and Development (OECD) guidelines for multinational enterprises**, adopted in 1976, are a set of recommendations made by OECD member countries and other adhering countries to multinational enterprises to encourage them to behave responsibly in their activities in a number of areas, including human rights, supply chain responsibility, the environment, consumer protection, anti-corruption and competition.

The UN and the Council of the European Union, as well as individual countries, can adopt restrictive financial or trade measures (also known as "**embargoes**" or "**sanctions**") against individuals, legal entities or

entities. These measures take the form of bans and restrictions on trade in targeted goods, technologies or services with certain countries, freezing of funds and economic resources, and sometimes restrictions on access to financial services.

The aim of **export controls rules** is to control all types of exports, likely to be diverted from peaceful civilian use of weapons of mass destruction, chemical or biological weapons, or weapons delivery systems, while facilitating and securing legitimate trade. Exports to countries under sanctions, including embargoes, are also monitored. There are also specific provision (e.g. In France) concerning the control of war material, based on a general principle of prohibition, which means that the entire defense sector and its flow are subject to State control. Finally, there are specific provisions for nuclear material control. Export control regulations are issued at several levels, including the European Union and the **United States**.

The International Bill of Human Rights, containing the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights: this set of documents constitutes the body of fundamental texts protecting human rights under international law. The Universal Declaration of Human Rights is the key document in the history of human rights. Adopted in 1948 by the United Nations General Assembly, it sets out the essential human rights and fundamental freedoms to which all men and women throughout the world are entitled without discrimination.

The **General Data Protection Regulation (GDPR)** is a European regulatory text that frames data processing equally throughout the European Union. It came into force on May 25, 2018.