



CODE OF CONDUCT

Preamble

As a private security company, industrial support services and of technical assistance, GEOS Group provides responsible services notably safety, security and defense in complex environments.

GEOS Group wishes to conduct its actions around fundamental principles which constitute its ethics, shared without reservation by all of the Group's employees.

GEOS Group is well identified by the French authorities as well as those of the countries where it is brought to exercise its expertise and assistance activities. GEOS Group attaches a particular importance to the compliance with legislation and the transparency of its structures and its activities.

Article 1: Membership to principles

GEOS Group fully adheres to the principles of the United Nations Global Compact on Human rights, Labor rights, Environmental protection and supports the action of the Global Compact Office.

GEOS Group undertakes to respect the texts of the Universal Declaration of the Rights of the Man of 1948, from the Rio and Johannesburg Conferences on the Environment.

GEOS Group is a member of the ICoCA (International Code of Conduct Association) and has signed in November 9, 2010 the International Code of Conduct for Private Service Security Providers (ICoC) by which it undertakes in particular "to provide security services in a way which is responsible, which respects the rule of law and the human rights of all people and protects the interests of its customers".

GEOS Group ensures full compliance with these texts and these principles by all of them who act on its behalf: employees, suppliers and service providers.

Article 2: Compliance with laws

Given the specific nature of its activities, GEOS Group reserves the right to refuse any assignment that does not comply with its ethics and the laws in force in France and in the countries of the mission concerned.

GEOS Group and its employees comply with all the laws and regulations of the countries where they operate, including national security rules for activities concerned. Each employee refrains from actions and behaviors which can involve itself, other collaborators, its company or the Group in a illegal practice.

Strict compliance with the rules of law in matters of corruption, competition and embargo is essential. Likewise the rules relating to work and employment, health and safety, as well that protecting the environment require particular vigilance.

Beyond laws and regulations, GEOS Group ensures respect for the cultures and customs of countries in which it operates.

Article 3: Respect for persons

GEOS Group excellence rests on that of its employees. Development of each individual is a necessary condition for the collective success of the Group.

GEOS Group undertakes not to discriminate on the basis of an illegal ground for whatever reason for hiring or labor relations.

Attaching particular importance to recruitment, GEOS Group shall refrain and prohibits all its employees, any discrimination based on race, skin color, gender, religion, social origin, social status, ethnicity, disability or sexual discrimination. GEOS Group recruits on the basis of initial and professional training, know-how and experience of each candidate and on the basis of intrinsic requirements of the missions to be executed.

Any moral or sexual pressure, pursuit or harassment is prohibited.

GEOS Group complies with the laws relating to the privacy of employees, especially concerning computer files, and set up the appropriate devices.

GEOS Group is committed daily to ensure and strengthen the security of its employees in the exercise of their missions and activities.

Article 4: Respect for customers

GEOS Group places its action in lasting relationships, based on trust and mutual respect.

GEOS Group's relationships with its customers, because they can be exercised in exceptional conditions, are part of a partnership based on relationships of trust characterized by sincere and loyal information and respect for the commitments taken against them by the Group.

GEOS Group undertakes to provide only missions or services for which it masters execution and has the means necessary to offer the best possible level of security for people, values and property to be protected.

In the context of its activities, GEOS Group may be led to collect or process sensitive or confidential information concerning the partner company. The utmost discretion is an essential rule for the employees of GEOS Group. Each employee is responsible for observing professional discretion and ensuring that no confidential information that he holds because of his duties are disclosed inside or outside the Group.

GEOS Group and its employees will take care never to harm, through their actions and initiatives known to their partners.

Article 5: respect for the environment

GEOS Group is aware of evolving in a world which will face ecological challenges for present and future generations. This is why, GEOS Group is engaged in a voluntary approach to reduce its environmental impact.

Control of water and energy consumption, waste management and air quality in our office are concerns common to all GEOS Group employees. Each employee strives to maintain a safe work environment, protecting the health and minimizing the consequences of its activity on the environment.

Article 6 6: Whistleblowing

In a process of continuous improvement of its ethical policy, GEOS Group undertakes to process any report drawn-up by one of its employees, or by a third party, on the violation of the principles set out in this Ethical Charter and in the Code of international conduct as well as any failure on its part or that of one of its subsidiaries.

To this end, an email box dedicated to these reports (named "Whistleblowing") is available to everyone at the address: ethics@groupegeos.com. GEOS Group Human Resources Department (HRD) is responsible for investigating "Alerts" and for following them up as quickly as possible. The HR Department scrupulously respects the strictest confidentiality when receiving, processing and investigating complaints.

These reports are processed completely anonymously to protect the identity of the complainants.

This procedure is fair, accessible and impartial to be as effective as possible. The files are stored in different files in the ethics@groupegeos.com mailbox to be forwarded to the competent authorities if necessary.

No penalty measure may be taken against an employee who has reported in good faith and disinterestedly a breach of the rules of this code.

In the event that a member of GEOS Group staff violates the International Code of Conduct or the principles of the Ethics Charter, immediate disciplinary sanctions would immediately engage against him.

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FRANCE