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# ETHICAL CHARTER

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THIS CHARTER IS DESIGNED TO UNIFY OUR EMPLOYEES  
AROUND A COMMON FRAMEWORK  
OF COMMITMENTS UNDERPINNING GROUP STRATEGY  
TO IMPLEMENT A CONTINUOUS IMPROVEMENT  
APPROACH ON A DAILY BASIS.

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A RESPONSIBLE  
EMPLOYER

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P.2



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A PARTNER  
OF EXCELLENCE

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P.6



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A COMMITTED  
PLAYER

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P.10



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## WHAT'S WHAT?

For more information related  
to the underlined notions, consult  
the section "What's What?"  
at the end of this document.



The employees of the Altran Group are united around a set of five simple yet solid values: innovation, excellence, dynamism, care and responsibility. The ethical charter is in keeping with our ambition to share these common values across the Group as a whole and to enhance our ability to meet our stakeholders' expectations.

This charter is designed to unify our employees around a common framework of commitments underpinning Group strategy to implement a continuous improvement approach on a daily basis. As emissaries of these values and commitments, every employee plays an active role in contributing towards preserving the confidence vested in us by our clients which is indispensable to the success of our Group.

The Ethical Charter underscores the international guiding principles endorsed and recognised by the Altran Group: the Universal Declaration of Human Rights, the ILO (International Labour Organisation) Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact, the Diversity Charters of several European countries, and the French Charter of Responsible Supplier Relations.

In the course of our daily activities, we continue to strive to be “a partner for excellence” for our clients and suppliers; “a responsible employer” for the women and men who make up the Group, and “a committed player” for the society and the environment in which we live.

I would like us all to remain faithful to this common set of values and commitments so that, together, we can write the next chapter of the Altran story.

A handwritten signature in dark ink, appearing to read 'D. Cerutti', is positioned above the printed name.

**Dominique Cerutti**  
Chairman and Chief Executive  
of the Altran Group

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## BEING A RESPONSIBLE EMPLOYER

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Promoting a working environment that respects human rights and labour standards, in particular those relative to non-discrimination<sup>P</sup>, collective bargaining<sup>P</sup> and freedom of association<sup>P</sup>

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Ensuring that employees receive information relative to the Company and its key strategies

Altran commits to promote the application of the principle of non-discrimination at every stage of human-resources management, in particular with regard to the recruitment, training, career advancement and professional development of its employees.

Altran communicates the measures implemented to strengthen its commitment to non-discrimination and diversity.

Altran respects the laws in force regarding freedom of association in all countries where the Group operates. None of Altran's employees can be prevented from joining a trade union, nor penalised by the fact that they are, or are not, a member of any such organisation.

Altran respects the procedures defined by national laws, regulations and conventions related to collective bargaining, and promotes a formalised social dialogue in accordance with local practices and regulations.

Altran facilitates communication to ensure that everyone understands corporate messages and has access to clear and reliable information.

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## Providing the means for the professional development of Group employees

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### Promoting quality of life in the workplace

Altran offers its employees ambitious and challenging missions and projects that help sharpen their skills and further their professional development.

Altran supports its employees throughout the course of their individual career paths within the company by providing efficient processes designed to integrate best skills, career management based on care and responsibility, and a fair, recognition and remuneration policy.

Altran recognises and develops expertise and the sharing of knowledge thanks to internal networks of experts and targeted training programmes designed to foster excellence.

Altran encourages its staff to take the initiative, while complying with the Group's rules, and values, and fosters the work-life balance of its employees.

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## Ensuring the health and safety of Group employees at Altran locations and client sites, and when travelling<sup>P</sup>

Altran commits to comply with all laws and prevention procedures in force regarding health and safety in the workplace.

Altran's health and safety strategies are defined at the national level and serve to prevent risk and implement hygiene and safety measures.

Altran respects the hygiene and security policies and the emergency procedures of its clients when Group employees are working on-site.

Altran respects its legal obligation to communicate information relative to health and security.

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## Guaranteeing the confidentiality and security of personal data<sup>P</sup> of employees and third parties

All of Altran's companies collect the personal data related to their own employees, candidates and certain third parties. As such, each company in the Group is responsible for protecting the information it gathers and uses.

This protection guarantees the individuals concerned a right of control over data collection, access, treatment, conservation and usage.

Altran commits to comply with laws and regulations governing the protection of all personal data it collects in order to ensure the privacy of individuals.

In order to preserve the legitimate interests of the Group and respect individual rights, Altran only gives access to personal data after having obtained the necessary authorisation.

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## BEING A PARTNER OF EXCELLENCE

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## Protecting confidential information<sup>P</sup>

Confidentiality is key in the consulting business and plays an essential role in preserving the confidence that our clients and partners place in the Group. Any breach of confidentiality could be critical for the Group and have a damaging impact (in terms of loss of market share, financial penalties, negative reputation impact, corporate or individual sanctions, etc) on Altran's business, the Company and the people involved.

Within this context, Altran commits to respect all confidentiality agreements signed with its clients, commercial partners and suppliers.

Altran defines security practices and levels in accordance with risk-management objectives, as well as the needs and means of system and tool users.

Altran strives to raise the awareness of its employees to the rules and best practices regarding the use of IT systems and communication tools, including social media.

Altran ensures that its IT security approach is compliant with legal and regulatory specifications in the countries where the Group operates.

## Choosing partners whose commitments and ethical principles are at least equivalent to those set forth in this charter

Altran expects its suppliers and partners to adhere to the same ethical standards as those the Group imposes on its own business conditions, notably related to employee non-discrimination, the elimination of forced, compulsory and

child labour, working conditions, health and safety standards in the workplace, the fight against corruption, the protection of human rights and respect for the environment.

## Preventing corruption, insider trading and conflicts of interest

Working with integrity is one of Altran's core principles. Corruption is not only illegal but also totally against the values we stand for.

In many countries, corruption of a foreign official or an individual is a criminal offense.

There are two types of bribery:

- Active bribery: promising or giving “gifts” to individuals with a view to inducing them to act in a way that violates their professional obligations.
- Passive bribery: when individuals solicit or accept “gifts” inducing them to act or abstain from taking action that is in violation of their professional obligations.

Altran is committed to comply with legislation regarding the fight against corruption. Employees' rights and duties are defined in the anti-corruption procedure implemented at the Group level and in specific procedures adapted to meet regional legislative requirements.

Group employees with access to inside information<sup>P</sup> relative to the Company are referred to as insider traders. In this capacity, they are prohibited from carrying out, or authorising any buying, selling or related transactions involving securities of Altran Technologies or of any other company in which they may possess inside information at the time of the transaction in question.

Altran's insider traders are prohibited from disclosing any inside information, either to people within the Group or to any external bodies, unless this disclosure falls within the functional responsibilities of the employee in question.

Altran ensures that all employees, whatever their role or position, avoid all conflicts between their direct or indirect personal interests<sup>P</sup>, (including those involving close family members) and those of the Group. These situations notably concern the provision of services (as an employee or not) to Altran competitors, clients and suppliers.

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## Protecting company resources and assets

Company resources and assets cover intellectual property rights, equipment and goods (electronic and telephone resources, printers, facilities, company cars, etc.), company financial resources, methodological documents, procedures, technical and financial proposals and any other form of support related to group activity.

Protection of resources means ensuring that these are not lost, damaged, stolen, mistreated, wasted, transferred or sold without permission.

Group resources and assets serve to enable employees to fulfil the strategic objectives of the Company. Maintaining the integrity of Altran's resources and assets is key to the Group's success, which all employees may benefit from.

As such, Altran's resources and assets shall only be used for lawful and non-fraudulent purposes, and in accordance with the Group's interests.

Altran commits to ensure that employees do not use computer systems, corporate e-mail accounts and the Internet in an inappropriate manner.

Employees' rights and duties are defined at the national level in charters regarding the use of IT resources.

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## Respecting fair competition rules

Altran commits to comply with legislation governing competition and respect the fairness of commercial practices in the countries where it operates. It is in the interest of the Company to operate in a sector with reputable commercial

practices. Group activities are organised in such a way as to prevent any situation that might obstruct fair competition. Commercial partners are treated in an equitable and objective manner.

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## BEING A COMMITTED PLAYER

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## Leveraging employee expertise in favour of the common good and promoting staff participation in charitable initiatives

Altran rewards innovative projects in favour of the common good by providing skills-based sponsorship<sup>P</sup> programmes offering access to the Group's network of experts, notably via the Altran Foundation for Innovation.

Altran provides financial support to several national and international non-governmental organisations and associations and promotes the contribution of employee in-kind donations to these organisations.

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## Participating in the development and diffusion of environment-friendly technologies<sup>P</sup> and seeking concrete solutions to current environmental issues<sup>P</sup>

Altran provides its clients support in the development of innovative solutions that are more respectful of the environment.

Altran involves its employees in its quest for solutions to current environmental issues through its technological partnerships and its internal research programmes.



## WHAT'S WHAT?

1 / Discrimination in the workplace: treating people differently and less favourably for reasons that are not related to merit or the requirements of the job, but which are based on race, colour, gender, religion, political opinion, national extraction, social origin, sexual orientation or disability, etc.

2 / Freedom of association and right of collective bargaining: the rights of employees to establish and join organisations of their own choosing, for the purposes of asserting their opinion collectively within the company.

3 / Travel: refers both to employee home-to-workplace commuting and staff business trips.

4 / Personal data: information used to identify employees and third parties, either directly or indirectly. Such data may include surname, first name, date of birth, postal address, email address, computer IP address and telephone number, etc.

5 / Confidential information: defined as such by law, by contract or due to its inherent nature. In particular, confidential information refers to data transmitted by clients, suppliers and commercial partners and which the Group has pledged not to disclose. Respecting confidentiality implies limiting access to data, applications and systems to those who are authorised by virtue of their position or function within the Group.

6 / Inside information: non-public, precise information, directly or indirectly related to Altran Technologies and which, if rendered public, could affect the share price of the stock (or any other financial instrument issued by the company).

7 / Personal interests: refer to the interests of employees and any persons or corporate bodies with whom they are associated.

8 / Skills-based sponsorship: support provided to organisations, projects and general-interest associations, by way of access to employee skills during working hours. Skills-based sponsorship can take the form of technology development, project management, Internet site overhaul, IT infrastructure improvement, etc.

9 / Environment-friendly technologies: technologies that are designed to protect the environment, and which are less polluting, use resources in a more sustainable manner; recycle more waste and products, and treat residual waste in a more efficient and respectable manner than the older technologies they have replaced.

10 / The main environmental issues include the fight against climate change, the depletion of natural resources and the reduction of waste and sources of pollution.



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## TEAMS OF INNOVATION MAKERS THROUGHOUT THE WORLD:

- 1 Portugal, in-house event
- 2 United-Kingdom, Paris-London Bike Ride

- 3 Belgium, 20 km of Brussels
- 4 Switzerland, the Agility team
- 5 Spain, Top Employer Award



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6 India, Bermu'day

7 France, in-house event

8 Germany, B2Run Race

9 Scandinavia, Tough Viking Race

10 China, in-house event

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“Ethics is knowing  
the difference  
between what you  
have a right to do  
and what is right  
to do.”

— Potter Stewart

“Coming together is a beginning;  
keeping together is progress;  
working together is success.”

— Henry Ford

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“Whatever is worth  
doing at all, is worth  
doing well.”

— Nicolas Poussin

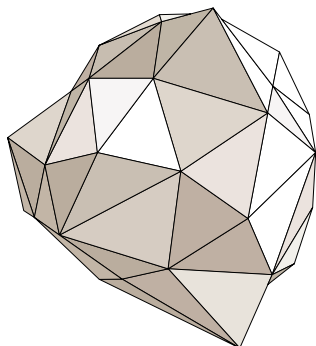
“Nobody is perfect but  
a team can be.”

— Meredith Belbin

“You must be  
the change you want  
to see in the world.”

— Gandhi

# INNOVATION MAKERS



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**alTran**