

# GROUP ETHICS

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2019 VERSION

MESSAGE FROM THE CHAIRMAN  
OF THE MANAGEMENT BOARD

p.3

ETHICAL PRINCIPLES SHARED BY ELIS

p.4

APPLICATION OF THE CODE OF ETHICS AND THE ROLE OF  
EMPLOYEES

To whom is the code applicable?

p.5

What is the role of employees in matters of ethics ?

p.5

OUR RULES OF CONDUCT

Protection of employees

Respect for persons

p.6

Respect for health and safety

p.7

Act with integrity, responsibility and set an example  
with and for all stakeholders

Respect for partners

p.8

Business partners

p.8

Fairness of practices / purchasing policy

p.8

Respect for free competition

p.9

The fight against corruption and influence peddling

p.10

Prevention of conflicts of interest

p.11

Lobbying

p.12

Financial documents

p.12

Protection of personal data

p.12

Protection of capital

Protection of assets

p.13

Respect for confidentiality

p.13

Protection and promotion of the group's image

p.15

Limiting environmental impacts

p.16

WHISTLEBLOWING PROCEDURE

p.17

# MESSAGE FROM THE CHAIRMAN OF THE MANAGEMENT BOARD



Dear Colleagues,

Elis is the leader in Europe and Latin America in the rental and maintenance of flat linen, working clothes, and hygiene and well-being equipment, and plays a pioneering role in its business sector. This leading position rewards the work of all the Group's employees and also requires that we comply with a number of commitments in order to be an ethical, responsible and environmentally-friendly company.

**The Group's success and growth are based on respect for others, exemplary behaviour, integrity and responsibility.**

These values have always been the DNA of Elis and are a frame of reference that guides our actions and inspires our choices.

As the Group develops throughout the world, and whatever our functions and the country in which we operate, we must, in the interest of Elis, continue to promote the highest standards of integrity and share our values with employees and partners.

The present Code of ethics cannot cover everything, but through the judgement and responsibilities of each and every one of us, it must help to seek and take the right decision in any given situation, respecting the applicable laws and regulations in each country where the Group now operates.

This Code is intended to be the bedrock on which all of the internal standards and codes adopted by the Group are based, including the *Sustainable and Ethical Purchasing Charter*, the stock market code of ethics, and the resources developed by the Group to fight the risk of corruption.

Each of us, whatever our position on the company scale, our entity of attachment or our geographical area of work, must be both the promoter and custodian of this Code of Ethics.

I know that I can count on each one of you to respect these principles.

Xavier Martiré  
Chairman of the Management Board

# ETHICAL PRINCIPLES SHARED BY ELIS

The ethical and responsible conduct of our Group is a promise of success and durability.

Respect for others and exemplary conduct in all circumstances are factors that help the development of all employees within the Group.

The principles shared by all employees of Elis can be summarised as follows:

- Act with integrity and responsibility, and set an example,
- Respect the dignity and rights of everyone,
- Act as an environmentally-friendly player,
- Comply with laws and regulations,
- Continually improve performance.

Respect for these principles and values will contribute to the Group's high reputation and performance.



# APPLICATION OF THE CODE OF ETHICS AND THE ROLE OF EMPLOYEES

## ➤ TO WHOM IS THE CODE APPLICABLE?

The Code of Ethics and its principles apply to the entire Elis Group, to all its activities, whether with its employees or in the conduct of business with suppliers, customers, stakeholders or in its activities with any other third party.

This Code of Ethics (including the implementation of its local variations) applies to all human relationships within the Group and outside. It also shows Elis's investment in environmental matters, because ethics and the environment are inseparable.

Concerning suppliers and business partners, Elis intends to fully associate them with its ethical and responsible conduct. Under its "*Sustainable and Ethical Purchasing Charter*" in particular, Elis expects its partners to adopt behaviour in accordance with the spirit of the present Code, particularly in the field of human rights and working conditions through the application of the international rules in force.

## ➤ WHAT IS THE ROLE OF EMPLOYEES IN MATTERS OF ETHICS?

Employees act in accordance with the ethical principles of the Group in all circumstances and whatever their occupation, their level of responsibility, or their interactions. Whatever the circumstances, all Group employees must comply with international, national, federal and local regulations and professional rules of ethics relative to their activities, and the ethical and compliance policies of the Group.

Each employee must read this Code of Ethics, undertake to abide by it in the context of his/her activities, and comply with the laws and regulations in force applicable to his/her function.

For its part, Elis will take every disciplinary measure and, where applicable, any legal action necessary to prevent or stop any breach of the provisions contained in the Code of Ethics.

Confronted with an ethical question, an employee must always ask himself/herself the following questions:

- are the laws and regulations in force being complied with?
- are internal procedures being implemented?
- is the Code of Ethics being complied with?
- should I consult my line manager?

Ethics is the responsibility of all and this Code must be used to help each employee to act with integrity, guide him/her in day-to-day choices and enable him/her to question the attitude to adopt in difficult situations that may be encountered in internal or external relationships.

This Code is available in various languages so that it can be understood in all of the countries in which the Group is present.

# OUR RULES OF CONDUCT

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## ► PROTECTION OF EMPLOYEES

### • Respect for persons

**Respect for persons is a fundamental value of Elis:** everyone has a duty to contribute to the cohesion of the Group and Elis therefore endeavours to implement good and harmonious human and professional relationships, both hierarchical and functional, meaning that they are fair and respectful to all.

With the well-being of its employees a constant concern, the Group watches over compliance with all social standards applicable under labour laws in each country where it is present, as well as with major international texts such as the Conventions of the International Labour Organisation and those protecting children's rights.

The Group is convinced that its development is based on the quality and involvement of the men and women within it, and that a pleasant working environment respectful of individuals is to everyone's benefit and a source of greater efficiency and productivity for the Group.

**Elis does not tolerate discrimination of any kind:** the Group ensures that each employee can develop in his/her work without being subjected to discrimination on account, most notably, of gender, religion, origins, age, sexual orientation, physical appearance, state of health, disablement or political orientations.

**Elis forbids any behaviour that may harm the dignity of an individual** and particularly any harassment in whatever form.

**Elis endeavours to promote diversity within its organisation** and considers the differences between its employees and business partners as an essential resource for the success of a Group of an international dimension.

**Elis promotes equality of opportunity for each employee or job applicant** in matters of recruitment, access to training, remuneration and social-security protection, and has a human-resources policy that encourages internal promotion, internal mobility and professional development through its training programme. Only skills, experience and professional and personal abilities are taken into consideration.

## QUESTIONS AND ANSWERS

- *A person in my service is constantly subjected to unwelcome comments from another colleague, notably concerning his/her physique. Even though these comments are made jokingly, I feel embarrassed because I think that this is hurting my colleague. What can I do?*

Your colleague's attitude is contrary to the Group's ethical principles when it comes to respect for individuals. Do not hesitate to inform your line manager, your human resources manager or the compliance officer through the whistleblower procedure described hereinafter; he or she will be able to quickly check the facts and, if necessary, take the appropriate remedial measures in accordance with applicable regulations.

# OUR RULES OF CONDUCT

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### • Respect for health and safety

Elis puts safety at the core of its concerns and takes care to offer all Group employees a healthy and safe working environment, preventing the occurrence of work-related accidents, injuries and illnesses.

All employees must be able to work in an environment where there is no risk to their health or safety.

Elis complies with all applicable rules relating to health and safety at work and takes all reasonable precautions to maintain a working environment that complies with legislation.

Elis regularly assesses physical risks in order to set up appropriate preventive measures and undertakes to introduce remedial actions should a risk arise or materialise.

## QUESTIONS AND ANSWERS

- *In my factory, I saw a situation that I think is dangerous for the production operators who are working on an item of equipment. What can I do?*

You must immediately alert your line manager, the maintenancemanager, the human resources manager or the compliance officer through the whistleblowing procedure described hereinafter, so that they can take the appropriate measures to allow production operators to work in complete safety.

# OUR RULES OF CONDUCT

## ➤ ACT WITH INTEGRITY, RESPONSIBILITY AND SET AN EXAMPLE WITH ALL STAKEHOLDERS

### • Respect for partners

Elis refuses any compromise over integrity, which must govern its day-to-day business relationships and professional practices.

Honesty and integrity must govern business relationships as well as interpersonal relationships and everyday professional practices. It is essential and imperative that everyone acts in an exemplary manner under all circumstances, and contributes to promoting a culture of integrity.

### • Business partners

Elis works to develop business relationships that are profitable to all and which can provide long-term benefits to our partners.

Elis implements a responsible purchasing policy, including requirements relative to respect for the environment, social progress and mutual economic development with its suppliers. Elis objectively chooses its suppliers, treating them fairly and in compliance with tendering procedures for each significant purchase.

Elis protects the confidential information of its partners as if it were its own and undertakes to protect the personal data of its partners, not to transfer it and not to use it without prior authorisation, and to store it in accordance with applicable regulations.

Elis respects all its commitments to its partners and takes care to maintain high standards of honesty, fairness and respect for human rights.

### • Fairness of practices / purchasing policy

The Group endeavours to maintain equitable and fair relationships with its suppliers.

In all countries where it is present, the Group endeavours to respect, and have its suppliers respect, the various laws and regulations in force and to routinely apply the values stated in the present code of Ethics.

To this end, Elis asks each of its suppliers to commit to responsible trading and ethical practices, particularly through its *Sustainable and Ethical Purchasing Charter* attached to purchasing contracts concluded with its strategic suppliers and accessible on Elis's internet site: [www.corporate-elis.com](http://www.corporate-elis.com). Through its *Sustainable and Ethical Purchasing Charter*, Elis requires for its suppliers to comply with the code of the international labour organisation and the rules relating to the protection of children's rights.

# OUR RULES OF CONDUCT

Furthermore, in its *Sustainable and Ethical Purchasing Charter*, Elis strictly controls the use of subcontracting, prohibiting its suppliers from subcontracting all or part of the contract that is assigned to them without prior written consent.

Elis supports the implementation of this *Sustainable and Ethical Purchasing Charter* with its strategic suppliers specifically through periodic audits of suppliers, to make sure that they are properly applying the principles laid down in the charter.

### • Respect for free competition

Elis believes in free, open and fair competition, a factor in economic and social progress and applicable to prices and to the quality and extent of each offering, in the interests of consumers and end customers.

The Group sets out to comply with applicable regulations in matters of competition in each market where it does business.

## QUESTIONS AND ANSWERS

- *At a conference, one of our competitors proposed that we come to an agreement on splitting certain markets. What should I do?*

Whether during professional meetings or outside your work, you must never discuss subjects or trade information in breach of the laws and regulations relating to competition or to any other area. If you find yourself in such a situation, withdraw from the discussion. Do not hesitate to consult the Group legal department to seek information about the laws and regulations applicable in this matter.



# OUR RULES OF CONDUCT

## • The fight against corruption and influence peddling

Elis applies a zero-tolerance principle throughout the entire Group when it comes to the fight against corruption, whether active or passive (i.e. that would be corrupter or corrupt), public or private. The Group strongly condemns any form of corruption and influence peddling both in its relationships with public entities and in private relationships with its partners, and is fully committed to the fight against corruption and influence peddling.

Corruption is defined as the act, for a public entity or private person (whether they be an entity or an individual), of soliciting, accepting, offering or giving, directly or indirectly, a benefit with the aim of accomplishing, delaying or omitting to accomplish an action that affects the normal exercise of a function.

Influence peddling is defined as the action where a person solicits or approves, at any time, directly or indirectly, any benefit whatsoever, for themselves or anyone else, or abuses or solicits the abuse of real or assumed influence in order to obtain, from an authority or public administration, honours, employment, contracts or any other favourable decision.

Elis therefore expects its employees :

- never to accept or propose anything –whether money, discount, gift, invitation, service or a benefit of any kind whatsoever, including corporate sponsorship or sponsorship that can be interpreted as influencing or influencing the beneficiary or certain business decisions;
- accept or offer only gifts or invitations authorized by the Gift, Hospitality, Donations and Sponsoring policy approved by the Group (or, if required, the local variations);
- ensure that sponsoring and gifts that they make on behalf of the Group have received the required authorisation, if so in accordance with the Gift, Hospitality, Donations and sponsorship policy adopted by the Group (or its local variations);
- never make any so-called facilitation payment designating the payment of modest amounts to administrative agents, notably to release or accelerate the processing of certain routine administrative services;
- never use the Group's assets or liabilities to make direct or indirect payment, whether to the benefit of a political party or a person seeking elected office.

## QUESTIONS AND ANSWERS

- *In the process of signing a contract, one of our partners wanted to offer me a gift of considerable value. Not wishing to risk compromising the good relationship that we have successfully built up, I wonder what behaviour I should adopt in such a situation?*

In principle, you should courteously refuse any gift of this type, explaining the Group's policy in this area.

- *A large supplier to the Group gives a reception for the inauguration of its new factory. Businessmen, politicians and civil servants are invited to this reception. Can I accept the invitation that I have received as a representative of the Group?*

Yes. We invite you to inform your management, beforehand, of this invitation.

# OUR RULES OF CONDUCT

## • Prevention of conflicts of interest

A conflict of interest, whether potential or real, can seriously harm the Group's reputation.

Employees must therefore anticipate or avoid any situation that creates or may create a real or apparent conflict between their personal interests and those of the Group.

There is conflict of interest when an employee or someone close to or allied with him/her is likely to personally profit from a transaction carried out on behalf of the company, particularly with customers or suppliers. The same applies if an employee tries to choose, or tries to have chosen, specifically as a supplier, a company in which they or someone close to or allied with them has a material or non-material interest, either directly or indirectly.

If such a situation occurs, each employee must follow the procedure defined below:

- inform your management in case of potential conflicts of interest which give, or may give, the impression of influencing your judgement and actions;
- refrain from occupying a function or from holding any financial interest or mandate within any organisation which is a competitor, customer, supplier or a commercial partner of Elis, and which would put you in a position to wield influence over the relationship.

## QUESTIONS AND ANSWERS

- *My brother manages a company that prints promotional documents and is recognised for the quality of its services. In my capacity as manager responsible for organising an information campaign for a new product, can I assign the implementation of this project to him, given that his company is providing the most attractive offer?*

Given the situation, you must inform your management of your relationship with this potential supplier so that the decision can be taken objectively and in a well-informed manner; you personally must refrain from participating in the decision-making process.



# OUR RULES OF CONDUCT

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- **Lobbying**

Lobbying consists in "influencing a public decision, notably on the content of a law or regulatory act by communicating" with public officials.

Lobbying, which consists in transparently providing useful information likely to enlighten public decision-making, must, to be legitimate, be confined to mere oral or written communication aiming to provide expertise in order to defend the Group's interests.

Employees must make sure that this activity is not re-qualified as influence peddling or even corruption and, in this respect must not exercise any pressure aiming to promote specific economic interests amongst decision-makers, or grant any material benefit or compensation of any kind whatsoever to the decision-maker.

Lobbying is carried out in strict compliance with applicable laws and regulations.

- **Financial documents**

The Group undertakes to ensure that the financial information it publishes, whatsoever the form thereof (annual reports, press releases, public presentations) related to its business activities, is accurate, sincere and relevant.

- **Protection of personal data**

The Group is aware of the scope of its responsibility concerning the protection and use of the personal data it collects and which is forwarded to it.

The use of this information by the Group and its employees must be in compliance with applicable legal and regulatory provisions (including GDPR General Data Protection Regulation), including the collection, processing, use, distribution and storage thereof, and the right for each person to access or rectify his or her own data. Each person should be able to exercise her rights.

## QUESTIONS AND ANSWERS

➤ *A friend who does not work at Elis asks me for the email addresses of my colleagues to execute a promotional campaign in the context of his professional activities. Can I give him/her this list?*

No. These information are personal Data held by Elis for specific purposes. They cannot be disclosed outside for other purposes.

# OUR RULES OF CONDUCT

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## ➤ PROTECTION OF CAPITAL

### ➤ Protection of assets

Upholding the integrity of the assets belonging to the Group is a guarantee for prosperity that benefits all personnel.

Every employee has a duty to help protect and preserve the assets of Elis against any damage, theft or misappropriation, and to use the company's tools and equipment only for strictly professional purposes that serve the interests of the company. Nevertheless, Elis exceptionally tolerates the use, for personal purposes, of certain tools such as email, providing that this does not detract in any way from the employee's work, the proper functioning of the information system, and the company's own image.

- **Respect for confidentiality**

Any person working in the service of the Group may have access to certain confidential information, namely information not yet made public, which may be of great value and must remain confidential inasmuch as disclosure or the use thereof may well be prejudicial to the Group's interests.

This information may concern acquisitions, financial results, marketing and commercial operations, products, industrial data and any item that may relate to the Group's intellectual property and know-how.

Whatever the nature of this information and the medium it uses, each employee must be aware of the harmful consequences of the voluntary or involuntary disclosure of such information.



# OUR RULES OF CONDUCT

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Furthermore, when the information in question is likely to influence the value of Elis securities quoted on the stock market, the employee holding this information then has the status of insider and must, as long as the information is not in the public domain, refrain from any operation with Elis' securities, directly or via any intermediary. In such a situation, caution and discretion are essential so as not to give rise to insider trading, an offence for which the penalties for both the company and the employee may be significant. The same applies to information of this nature that involves the Group's partners.

To this end, Elis has established a stock market Code of Ethics that can be read on its internet site [www.corporate-elis.com](http://www.corporate-elis.com), aimed at reiterating the legal and regulatory provisions applicable as to the protection, retention, dissemination, use, reproduction and destruction of sensitive and privileged information.

## QUESTIONS AND ANSWERS

- *During lunch at the company restaurant, I hear colleagues speaking in loud voices about the profits of our company for the last quarter, which will be publicly announced two days later. With this information, I know that I could buy shares in the company before the news is made public, to subsequently resell them at a profit.*

The possession of information of this nature makes you an insider and consequently you are prohibited from making any transaction with the company's securities as long as this information is not public.

Generally, it is crucial to always adopt the utmost discretion and caution before mentioning confidential subjects, particularly in a public place (station, airport, restaurant...).

# OUR RULES OF CONDUCT

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## • Protection and promotion of the group's image

The quality of the Group's institutional image and the reputation of its products and services create the conditions for its sustainability. The Group's personnel, realising their importance, must help to build the Group's positive reputation, must refrain from any criticism, and must neither initiate nor support any form of boycott, nor communicate in a negative fashion, nor conduct any action whatsoever that is prejudicial to the Group, including when using social media.

No external communication may be made by an unauthorised person. Any communication must always have received prior clearance from the line manager, who must inform the competent authorities accordingly.

## QUESTIONS AND ANSWERS

- *On my personal blog, can I put photos taken during an event organised by the company*  
It is preferable to request approval from the persons concerned. You must also ask yourself the following question: what image am I going to give of my colleagues, my company and myself by putting photographs online?



# OUR RULES OF CONDUCT

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## ➤ LIMIT ENVIRONMENTAL IMPACTS

As a front-line industrial player, Elis places its environmental responsibilities at the centre of its concerns and priorities.

Because the services provided by Elis have a direct impact on the environment, Elis has built a more sustainable economic model around the concept of economy of functionality, based on a range of high-quality products and services. Concerned with the life-cycle of its products and working on their eco-design and sustainability, Elis contributes to reducing pressure on its environment, unlike conventional modes of consumption that encourage disposable products or planned obsolescence.

Elis's environmental policy is built around the following four main themes and is part of a dynamic process for progress:

- optimisation and the economic management of the consumption of natural resources (water, natural gas, etc.),
- the reduction of pollution and the control of our environmental footprint (discharge of industrial effluent, emissions of greenhouse gases, etc.),
- the preservation and development of biodiversity,
- the recycling of most textiles at end of life.

Elis puts these principles into practice everyday in all of its production units and promotes the exchange of best environmental practices between teams.

The Group's contracts with its potentially at-risk or high-risk strategic suppliers contain a sustainable development standard, with regular audits carried out according to specifications established by Elis.

# WHISTLEBLOWING PROCEDURE

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In order to ensure the effectiveness of the principles and values specified in this Code, Elis encourages transparency.

Any employee confronted with a situation likely to breach a law, a regulation or the principles laid down in this Code of ethics may freely report the situation to his/her manager, to any other senior manager, to the compliance manager (compliance officer) also known as the system's «referring officer», or to his/her human resources manager.

Elis also provides employees with an alert system, enabling them to confidentially report any situation of this type that they may be personally aware of, or to obtain help and advice relative to the content of the present Code and its implementation procedures. The alert system is available at the following address:

<https://report.whistleb.com/elis>

No penalty or discriminatory measures will be taken against any employee who uses this alert system in good faith and without intention to cause harm.

Elis guarantees the confidentiality of the identity of the person raising the alert, the reported facts and the persons mentioned by the report. The disclosure of facts may be reported only through strict compliance with applicable regulations, notably concerning reporting procedures and their proportionate character in safeguarding the interests in question.

