



CODE OF CONDUCT

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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 Human Rights 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: RESPECT FOR BUSINESS ETHICS

Strict compliance with the law on corruption, competition and embargoes is essential.

To this end, the GEOS Group has adopted a "zero tolerance" approach to active and passive corruption and influence peddling.

Managers, employees or partners must not, directly or indirectly, offer, promise, grant or authorise the handing over of a sum of money or any other value with the aim of obtaining a favour or an advantage in the performance of their duties.

Similarly, GEOS Group entities in contact with public authorities must comply with the following and ethical obligations and regularly and formally monitor the commitments made to public commitments made to public decision-makers.

Article 3: RESPECT FOR LAWS

In view of the special nature of its activities, the 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 assignment concerned.

The GEOS Group and its employees will comply with all laws and regulations in force in the countries where they carry out their activities, in particular national security rules for the activities concerned. All employees shall refrain from actions and behaviour themselves, other employees, their company, the Group or its customers into an illegal practice.

Similarly, rules relating to work and employment, health and safety and environmental protection require particular vigilance on our part.

In addition to laws and regulations, the GEOS Group ensures that the cultures and customs of the countries in which it operates are respected.

Article 4: RESPECT FOR INDIVIDUALS

The excellence of the GEOS Group is based on the excellence of its employees. The individual development of each person is a necessary condition for the collective success of the Group.

The GEOS Group undertakes not to discriminate on any unlawful grounds, for any reason whatsoever, in recruitment or in employment relations.

Attaching particular importance to recruitment, the GEOS Group prohibits itself and all its employees from discriminating on the basis of race, skin colour, sex, religion, origin, social status, nationality, gender, disability, sexual orientation or any other grounds.

The GEOS Group recruits on the basis of initial and professional training, know-how and experience of each candidate and on the basis of the intrinsic requirements of the tasks to be performed.

Any pressure, legal action or harassment of a moral or sexual nature is prohibited.

The GEOS Group respects the laws relating to employee privacy, particularly with regard to computer files, and has put in place appropriate measures.

The GEOS Group is committed on a daily basis to ensuring and reinforcing the safety of its employees in the performance of their duties and activities.

Article 5: RESPECT FOR CUSTOMERS

The GEOS Group is committed to building lasting relationships based on trust and mutual respect.

The GEOS Group's relations with its customers, because they can take place under exceptional conditions, are part of a partnership based on a relationship of trust characterised by sincere and loyal information and respect for the commitments made to them by the Group.

The GEOS Group undertakes to provide only those assignments or services for which it has full control and the necessary resources to offer the best possible level of security to the people, assets and property to be protected.

In the course of its activities, the GEOS Group may collect or process sensitive or confidential information concerning the partner company. The utmost discretion is an essential rule for GEOS Group employees. It is the responsibility of each employee to observe professional discretion and not to divulge, either inside or outside the GEOS Group, any confidential information that they hold by virtue of their duties.

The GEOS Group and its employees will ensure that their actions and initiatives do not undermine the reputation of its partners.

Article 6: RESPECT FOR THE ENVIRONMENT

The GEOS Group is aware that it operates in a world that will face ecological challenges for current and future generations. For this reason, the GEOS Group is committed to reducing its environmental impact.

Controlling water and energy consumption, waste management and indoor air quality are issues of common concern to all GEOS Group employees.

Each employee strives to maintain a safe working environment, protecting health and minimising the impact of their activity on the environment.

Article 7: COMMUNICATION

This Code of Conduct is distributed to all employees in the most appropriate way, as defined by each entity and is accessible on the GEOS Group website and on its staff website.

Each manager, employee or subcontractor of the GEOS Group will receive information on the principles and commitments of this Code and on the personal data protection policy during the induction process.

Article 8: ALERT

As part of the continuous improvement of its ethics policy, the GEOS Group undertakes to deal with any report made by one of its employees, or by a third party, of a breach of the principles set out in this Code of Conduct and in the International Code of Conduct, as well as any breach on its part or that of one of its subsidiaries.

The GEOS Group provides all Group employees with a system to report any doubts or concerns about the application of the law or the standards of the Code, confidentially and without fear of reprisals.

The facts reported must concern one of the following cases:

- A breach of the rules of this Code of Conduct ;
- A crime or misdemeanour ;
- A serious and manifest violation of an international commitment, a unilateral act of an international organisation, law or regulation ;
- A threat or serious prejudice to the general interest.

In accordance with the professional alert procedure, the alert may be brought to the attention of either the hierarchical superior or the Referent appointed by ADIT at the following address adit@alertethic.com.

In addition, no retaliatory measure (disciplinary sanctions, dismissal, discriminatory measures, etc.) will be tolerated against an employee who has reported a situation or behaviour prohibited by this Charter.

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