

## In-House Code of Ethical Conduct

This in-house Code of Ethical Conduct lays down the principles and values of the Société de la Tour Eiffel to be followed by all Group's employees.

### 1 - OUR PRINCIPLES AND VALUES

#### OUR PRINCIPLES

In its relations with stakeholders, the Company has based its Code of Conduct on the **Global Compact** launched by the UN engaging companies to respect certain universal principles in terms of human rights, working conditions, the environment and the fight against corruption.

The principles are as follows:

#### Human rights

- Promoting and enforcing the protection provided by international law on human rights within their sphere of influence;
- Ensuring the Company is not an accomplice to violations of human rights;

#### Labour law

- Respecting freedom of association and the right to collective bargaining;
- Eliminating all forms of forced or compulsory labour;
- Ensuring the effective abolition of child labour;
- Eliminating all forms of discrimination in employment and occupation;

#### Environment

- Applying the precautionary approach to environmental issues;
- Undertaking initiatives to promote greater environmental responsibility;
- Encouraging the development and dissemination of environmentally-friendly technologies.

#### Fight against corruption

- Working against corruption in all its forms, including extortion and bribery.

## OUR VALUES

The Company has defined its corporate values as follows, and requests that its employees refer to them in carrying out their tasks:

- **Professionalism** : striving for excellence in relation to our peers
- **Valuation and recognition of skills**
- **Team spirit**: being willing to help each other in order to succeed together
- **Anticipation** : ability to find solutions
- **Trust** : a company that keeps its promises to its stakeholders

## 2 - RELATIONS WITH STAKEHOLDERS

The Company's principles and values in relation to its stakeholders are effectively applied as follows:

### WITH RESPECT TO EMPLOYEES

The Company attaches particular importance to the respect for human rights and is committed to comply with all of the French Labour Code, which integrates the obligations of eight Fundamental Conventions of the International Labour Organisation (ILO).

More specifically, the Company refuses any discrimination in hiring and career promotions, and ensures gender parity at every level.

It strictly applies the principle of equal opportunity, in terms of pay, access to vocational training and all other corporate issues.

It has undertaken to comply with the law on the employment of disabled people.

It prohibits any form of harassment, as described in the in-house regulations of the subsidiary TEAM Conseil.

### Implementation of the Company's principles and values by employees in the performance of their tasks

The Company requires that its employees comply with its principles and values.

**With respect to stakeholders**, employees must be exemplary in terms of responsibility, respect and ethics.

Gifts and Invitations Policy: in carrying out their duties, employees must not solicit, accept, offer or provide any benefit (payments, travel, gifts, benefits in kind or otherwise) unless they are of little pecuniary value.

**With respect to the Company**, employees must behave fairly, respect confidentiality and strive for excellence in carrying out their duties.

Employees must avoid situations involving a conflict between their personal interests and those of the Company.

Since the Company is listed, there is a risk of insider trading which is the subject of specific information that employees must respect.

Finally, the Company requires employees adopt environmentally responsible behaviour when carrying out their duties, both inside and outside our offices, and has laid down a number of tacit rules in order for doing so.

**With respect to their colleagues**, the employees must act with **solidarity, consideration, a sense of responsibility** and **teamwork**.

If an employee has a hesitation about the ethics of a given situation, they must ask themselves the following question:  
**Is this situation legal, is it consistent with the Company's principles and values?**

If in doubt, they should refer to hierarchy.

### WITH RESPECT TO SHAREHOLDERS

The Company undertakes to ensure the reliability of the information, transparency and ethics it employs in relations with shareholders.

In its governance, the Company refers to the **Middlenext Corporate Governance Code**.

It is also a member of the **FSIF** (French Federation of Property Companies) and complies with its **code of ethics**.

The Board's rules of procedure specify its rules of ethics and how to apply them, whether in preventing conflicts of interest or insider trading.

The procedures for internal control and risk management set up within the Company also help to control the risk of conflicts of interest or fraud.

### WITH RESPECT TO CUSTOMERS

Relations with customers are based on professionalism, respect, integrity, compliance with laws and regulations, and confidentiality.

### WITH RESPECT TO SUPPLIERS

As in its relations with customers, relations with suppliers are based on professionalism, respect, integrity, compliance with laws and regulations, and confidentiality.

In selecting its suppliers, the Company has started to include criteria relating to the environment and human rights.

**The charters of commitment signed with Facility Managers and Builders** is designed to encourage better environmental practices and ensure the inclusion of corporate and societal issues.

### 3 - COMPLIANCE WITH ENVIRONMENTAL VALUES WITHIN THE COMPANY

The Company applies the environmental approach adopted in its property business to its head offices, and involves its employees in complying with these values in order to reduce its environmental impact.

#### **Actions implemented in its head offices:**

- **Rational energy consumption:** a main switch allows the last person leaving the premises to turn off all the lights more easily.
- **Eco-Certified cleaning products:** the company uses a service provider that uses eco-certified cleaning products.
- **Reduced paper consumption:** many actions have been taken to save ink and paper: printers have been appropriately configured, printouts that are no longer needed are reused (notebooks, drafts, etc.)
- **Selective waste sorting** (recyclable and non-recyclable) using bins provided for this purpose.
- **Use of a water fountain network** to minimize the consumption of plastic bottles.

Finally, employees donate to a charity by **collecting caps from water bottles** for the "Bouchons d'amour" [*love caps*] association.

#### **Actions implemented outside the premises:**

- **Renewing the vehicle fleet:** the fleet is renewed every three years to benefit from advances in fuel consumption and progressively reduce CO<sup>2</sup> emissions.
- **Giving priority to public transport and trains** for business trips and commuting.

Together, these actions by the company allow employees to act as eco-citizens, thereby minimizing its carbon footprint.