



# ETHICS CHARTER

2020 MARCH EDITION  
CORRUPTION PREVENTION SYSTEM



# EDITORIAL



Since its creation, GL events has built its business on strong values, driven by a proactive policy regarding ethical conduct. With our international development, we have further reinforced our position in this regard.

Today, as a major international events company, we have a duty to ensure our conduct is truly exemplary. Our actions are built on integrity, loyalty, combating all forms of corruption, remaining vigilant as regards subcontracting and protecting the Group's employees, assets and reputation.

Working for and alongside many different public and private customers around the world, our teams translate these principles into tangible actions in the field, in accordance with our commitment to corporate social responsibility (CSR) and sustainable growth.

This Ethics Charter is not only a reference base; it should also serve as a guide for each of us on a day-to-day basis. It encourages us to follow ten fundamental principles to structure our initiatives and how we carry out our work.

It underlines the common goal that drives all the Group's employees, namely to conduct our missions in total compliance with requirements, with transparency and determination, and, ultimately, to ensure the job is done properly and well.

**Olivier GINON**  
Chairman



## **PIONEERING SPIRIT**

Initiative  
Determination  
Scrupulousness  
Individual accountability

## **IMAGINATION**

Audacity  
Agility  
Innovative solutions  
A view of the project as whole

## **RESPECT**

For employees  
For customers  
For suppliers  
For shareholders  
For the environment

## **GROUP MINDSET**


Shared ambition  
Trust  
Transparency  
Loyalty  
Equality





# TEN FUNDAMENTAL PRINCIPLES


# 1 EQUALITY AND DIVERSITY

 Human resources are a major factor in driving the Group's performance and success. Each employee undertakes to help create a rewarding professional environment and to refrain from any denigrating acts. In accordance with the Think People initiative:

- Each employee treats their colleagues with dignity and loyalty, in compliance with the Group's values.
- We fight against all forms of discrimination, promote the social and professional inclusion of disabled persons (1) and give all employees an equal opportunity.
- We develop our employees' skills through internal training.
- We identify and reduce the risks of forced labour or undeclared work by conducting checks and assessments of our sites and operations.

*(1) In France, GL events signed an agreement with AGEFIPH (a French Association in charge of managing funds for the integration of disabled persons) in November 2014.*

## 2 RESPECTING COMMERCIAL PARTNERS, CUSTOMERS, SUPPLIERS AND COMPETITORS


 **As a leading player in our sector, we are committed to ethical business conduct and refuse all forms of illegal anti-competitive agreements, monopolistic or unfair practices. Commercial partners are treated fairly in all the countries in which the Group operates.**

Each employee has a duty to act in the interest of the Group, by complying with international rules, the legislation in force in each country in which the Group operates and the specific provisions of this Ethics Charter:

- The Group complies with the specific rules governing public contracts applicable in each country in which it operates.
- The Group's employees shall not propose any favours or advantages, be they financial or other, to third parties.
- Promising or giving gifts or free services is forbidden, unless in the case of everyday acts of courtesy and hospitality, or in the case of symbolic or small gifts. Sales operations shall comply with the legislation applicable to the activity concerned, and shall remain within the limits of the most reasonable practices and customs of the profession, or the country concerned.




## 3 COMMUNICATION AND INFORMATION – **LOYALTY** TOWARDS SHAREHOLDERS

 In accordance with the regulations applicable to listed companies, we apply the principles of transparency, reliability and accuracy to the information that we communicate:

- Our communication complies with the official regulations applicable to listed companies. Each employee must ensure the confidentiality of any non-public information that could have an impact on the GL events share price, until the information concerned has been published by the persons responsible for this type of communication.
- The Group undertakes to provide its shareholders with sincere, high-quality information.


## 4 PROTECTING THE GROUP'S **IMAGE** AND ASSETS

 The Group strives to protect its image and reputation through various information and communication media. The Group has significant assets that reinforce its leading status in the market. The quality of the Group's institutional image and reputation are key factors for the company's long-term viability.

We have established a corporate image that is associated with professionalism, customer satisfaction and high-quality service.

- Each employee has a duty to protect and safeguard the Group's tangible and intangible assets (furniture, buildings, intangible assets identified and defined by the law, market information, sales practices and policy, studies or data that employees may have access to within the framework of their job) even after their departure from the company.
- We apply the greatest discretion and care as regards the terms we use to talk about the Group in private circumstances.
- Only employees who have the requisite authorisation based on their professional responsibilities may use media and social networks to communicate information about the Group.


## 5 DATA CONFIDENTIALITY

 Any information that is not public must be protected, whether it concerns the company, its employees or third parties. Any unforeseen or accidental disclosures may affect the Group's competitiveness, and potentially result in malicious actions or unfair competition:

- We comply with the national laws and regulations relating to the collection and use of personal data in order to protect the privacy of our employees and stakeholders.
- We are particularly vigilant and take all necessary measures to prevent viruses from entering our information system, to ensure files or databases cannot be hacked and to prevent other malicious actions.
- We are constantly improving the protection of sensitive information and the secure storage of data, notably as regards commercial data.




## 6 POLITICAL AND UNION **NEUTRALITY** AND SPONSORSHIP/PATRONAGE OPERATIONS

 Any contribution made by the Group to an organisation, party, political figure or charity, is subject to a prior written approval, in compliance with the rules and procedures in force.

- The Group maintains political neutrality.
- Each employee is free to hold their own political beliefs and commitments, insofar as this remains a strictly personal position.
- Each employee undertakes to separate their personal political activities from their missions and work within the Group.
- Contributions to charities and corporate sponsorship initiatives serve the general community and contribute to promoting civic actions.
- The Group recognises its employees' trade-union involvement in compliance with the applicable local law.


# 7 **TRANSPARENCY** :

## MANAGEMENT OF CONFLICTS OF INTEREST

 Each Group employee must make decisions in an objective manner, without any consideration of their personal interest and in accordance with applicable local standards and regulations:

- To ensure equitable business conduct, each employee shall identify any potential personal conflicts of interest and act in the best interests Group.
- Each employee shall avoid attempting to influence a Group decision for their personal benefit, by favouring a family member or friend.
- All employees must be transparent and inform their manager about any relationship they may have with a stakeholder involved in a business operation.


## **8 CONFIDENCE :** FINANCIAL TRANSACTIONS, ACCOUNTANCY

 **The Group seeks to maintain the confidence of shareholders, tax authorities and stakeholders by providing them with transparent and regular information:**

- We provide sincere accounting and tax information, reflecting a true picture of the Group's financial situation, transactions, assets and liabilities.
- Each employee shall contribute to internal inspections and audits with a view to ensuring that any deficiencies or significant weakness may be identified and corrected, for the sake of transparency and honesty.
- We strive at all times to avoid being inadvertently part of any operation that may involve money laundering and we undertake to alert the competent authorities if this case arises.




## 9 INTEGRITY : COMBATING CORRUPTION

 In order to avoid any potential risk of corruption, the Group has established an Anti-Corruption Code of Conduct which has been incorporated into the appendices of the internal regulations. The Group asks its employees to pay particular attention to their relations with all commercial, institutional or administrative intermediaries. The Group is committed to complying with and enforcing national and international legal provisions to fight against corruption:

- Each employee is encouraged to establish business relations built on the principles of transparency and integrity.
- Business negotiations shall not involve any type of conduct or acts that may be qualified as active or passive corruption, influence peddling or favouritism.

# 10 PROTECTING THE **ENVIRONMENT**

 The Group is committed to promoting sustainable development through its Think Green programme concerning environmental issues:

- We incorporate environmental protection into our day-to-day business activities.
- We contribute to reducing waste and recycling products at the end of their life.
- We promote a sense of personal responsibility as regards protecting the environment.







## A REFERENCE POINT

The pioneering spirit of the GL events Group obviously means employees sometimes find themselves in unexpected situations; this is why the Ethics Charter is intended to serve as a practical reference point, guiding the choices each of us make, wherever we may be, and whatever the situation. The 10 principles of the Ethics Charter set out the day-to-day requirements that should guide our actions in an increasingly complex, global and multicultural business environment. The Ethics Charter is a benchmark, a guide to help us navigate through the various situations we may encounter.

## A POTENTIALLY TRICKY OR SENSITIVE SITUATION

If I find myself in a potentially difficult situation, or if I have any doubts about whether my actions comply with our ethical principles, I should ask myself the following questions:

- Is my decision consistent with the Ethics Charter?
- Will my decision serve my own interests or those of the Group?
- Will my decision convey a good image of the Group?
- Would I feel comfortable if my decision were publicly known?

## TAKING INITIATIVE

If I cannot answer the above questions, I must consult one of my superiors as quickly as possible in order to resolve any ethical issues I may have. In the event my superior is also personally involved in the problem concerned, I should discuss the matter with a human resources manager or send an email (which will be treated in total confidentiality) to the Compliance Department: [natassia.mounetou@gl-events.com](mailto:natassia.mounetou@gl-events.com) or [clarisse.ladurelli@gl-events.com](mailto:clarisse.ladurelli@gl-events.com).

In addition, the GL events Group has implemented an internal alert system for all its employees (which is also open to external or temporary staff). The system enables employees to report any conduct or situations that contravene the Ethics Charter and/or the Anti-corruption Code of Conduct and ensures total confidentiality: <https://glevents.whispli.com/alertes>.



