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# ETHICS CHARTER

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## Corporate Responsibility

Written by  
**NSE GROUP**



[+33 4 70 58 43 90](tel:+33470584390)



NSE Abrest ZA la Tour,  
03200 ABREST



[www.nse-groupe.com](http://www.nse-groupe.com)

# MESSAGE FROM THE NSE MANAGEMENT BOARD

Since its creation, NSE has relied on a strong corporate culture guided by five essential and inseparable values: **Rigour, Honesty, Hard Work, Frankness and Humility.**

More than ever, these values form the foundation of our collective action and guide our decisions, behaviours and professional relationships.

They reinforce the requirements of **loyalty, transparency** and **integrity** that must guide all NSE employees, partners and stakeholders.

Aware of its economic role as well as its responsibility to society, NSE has been committed since 2021 to an **ambitious corporate social responsibility approach**, integrating ethical, social, environmental and business conduct principles.

The relationships that NSE maintains with its customers, suppliers, partners and institutional stakeholders must comply with the principles presented in this Charter.

This Charter formalises—without claiming to be exhaustive—the behavioural rules expected of all teams, and more particularly of the **Sales, Programmes, Purchasing, Human Resources, IT and Legal** departments, in the performance of their duties.

NSE supports its employees and encourages its partners to apply these principles by raising their awareness of the importance of acting in an exemplary manner.

We invite anyone who witnesses a situation contrary to the law or to the principles of this Charter to report it. NSE also reserves the right to carry out any checks or audits, if necessary, to ensure proper compliance.

We are counting on everyone's commitment to bring this Charter to life on a daily basis and thereby strengthen the trust that our customers, partners and institutions place in NSE.

**The Management Board.**

*In the context of this Charter, the term "NSE employees" refers in particular to employees, external service providers, even if they are occasional (temporary workers, trainees, volunteers, etc.), whether they work full time or part time, shareholders and corporate officers.*

<sup>2</sup> *In the context of the present Charter, the Partners designate the suppliers, distributors, subcontractors, customers, business providers, commercial agents and all other third parties maintaining commercial relations with NSE, regardless of the location of their activity.*

*Partners are understood to be all natural or legal persons: this includes, but is not limited to, all employees, collaborators, even if they are occasional, and corporate officers of the Partner.*

*All natural or legal persons who are subcontractors or contractors of the Partner are considered to be NSE Partners.*

# THE PRINCIPLES OF THE CHARTER

## 1. HUMAN RESOURCES

NSE employees and partners must comply with all applicable social and human rights laws and regulations.

### • RESPECT, PROTECTION, NON-DISCRIMINATION

NSE shall ensure equal treatment and equal opportunities, avoiding any discrimination among people, in particular with regard to recruitment, remuneration, access to training, promotion or membership of a trade union, on the grounds of their social or ethnic origin, gender, age, family status, sexual orientation, genetic characteristics, nationality, patronymic, political opinions, trade union activities, religious convictions, physical appearance, health, disability or state of pregnancy. The consideration of the nationality of persons must be strictly limited to the exceptions provided for by national legislation.

### • HARASSMENT

NSE prevents all forms of harassment, whether physical or psychological, as well as any other abusive conduct. NSE respects privacy by accepting differing opinions.

### • COMPLIANCE WITH SOCIAL LEGISLATION

NSE :

- Respect the local social legislation applicable to it, particularly with regard to the minimum wage and compulsory social benefits or maximum working hours, whatever the country in which NSE operates,
- Complies with the Conventions of the International Labour Organisation (ILO), which implies in particular that it will not offer for sale products or services that may have been manufactured in contravention of the prohibition of illegal labour, forced labour, child labour, the minimum weekly rest period of twenty-four consecutive hours, bargaining, illegal lending of labour, employment.

## • **RESPECT FOR SOCIAL RELATIONS**

NSE respects the freedom of association and the right to organize and bargain collectively. All workers must be adequately protected against any act of discrimination that would undermine freedom of association in employment.



## • **HEALTH & S AFETY AT WORK**

NSE is committed to implementing a health and safety policy that aims to provide a safe and healthy workplace for every employee and to maintain an environment in which the dignity of individuals is respected.

NSE encourages its partners to implement a structured health and safety approach in all countries where they operate.

## • **ENVIRONMENT**

NSE shall take appropriate and effective measures to assess, avoid, limit and mitigate the environmental risks and impacts associated with its activities, in particular :

- Ensure that its operations are conducted in strict compliance with the environmental regulations in force in the countries where NSE operates,
- To limit the environmental impact of its activities, in particular by reducing as far as possible the consumption of energy and natural resources, producing as little waste as possible, and controlling all other potential forms of pollution,
- Ensure that the products and services it provides do not contain any substances or preparations that are hazardous to humans and/or the environment and prohibited by the applicable laws and/or regulations in the countries where it operates,
- Prevent and mitigate the risks that its activity may have for public health (hazardous materials, radiation etc.),
- To raise awareness and train all those involved on the sites.

NSE encourages its partners to implement a structured environmental approach in all countries where they operate.

## 2. BUSINESS RELATIONSHIPS



### DUTY OF PROBITY

In the context of business relationships, all NSE employees and partners undertake an obligation of probity, integrity, and independent judgment.

### CONFLICT OF INTERESTS

Personal interests shall not be a factor in the choice of a contractor under any circumstances. It is recalled that all agreements must be negotiated, formed, and executed in good faith. NSE fights against all forms of conflict of interest or situations that could lead to a potential conflict of interest that would undermine probity, integrity, and independence of judgement.

### INSIDER TRADING

All employees and partners of NSE are prohibited from taking advantage of non-public information they receive from NSE or its partner in the course of their duties or during the business relationship, for their own personal benefit or for the benefit of others.

### COUNTERFEIT

NSE implements and maintains effective methods and processes appropriate to its activities to ensure that counterfeit parts and materials are not introduced into the delivered product.

## ● **PREVENTION OF ILLEGAL COLLUSION**

NSE :

- Respects and ensures that its employees and its own partners respect the national and international regulations applicable to them in the fight against corruption,
- Exercise reasonable vigilance to prevent and detect any act of corruption, whether passive or active, or influence peddling in its commercial agreements, whatever their purpose, and in particular to obtain awards, jobs, contracts or any other favourable decision,
- Exercise reasonable care to ensure that offers, promises, gifts, donations, business gestures or benefits of any kind offered or received are permitted by law and the contractor's regulations or charters and are consistent with commonly accepted practices.
- In all cases, monetary and/or in-kind benefits such as: discounts, commissions, gift cards, gifts, cash rebates, vouchers and coupons, trips, invitations to events not related to the commercial partnership shall not exceed a value of €100 per year.
- Provide its employees, particularly those whose functions are exposed to the risk of corruption, with appropriate awareness-raising measures.

## ● **REGULATION ON COMPETITION**

NSE is committed to complying with applicable anti-money laundering regulations. Accordingly, NSE must ensure the good reputation of its own partners and the legality of their activities.

NSE :

- Complies with laws and regulations aimed at protecting competition and prohibiting anti-competitive practices,
- Respects the principle of free pricing,
- Does not collude with competitors on prices or bid-rigging,
- Does not share market's information with competitors,
- Does not exchange sensitive information with competitors,
- Does not set commercial terms that could be described as excessive, discriminatory, or constituting an abusive loyalty scheme or an abuse of a dominant position.

### 3. INFORMATION & ASSET PROTECTION

#### INFORMATION PROTECTION

NSE treats sensitive information of a confidential nature (e.g. business secrets, processes) in an appropriate manner. Such information must not be used for any purpose other than the business purpose for which it was intended. Access to confidential information is strictly limited to officially designated or authorized persons only, or where such disclosure is required by law.

In order to protect NSE's data, information systems and telecommunications networks from fraudulent use, all users must comply with the security policy set out in the IT Charter.

#### PROTECTION OF PERSONAL DATA

NSE treats confidential data appropriately.

NSE may entrust data and/or give access to its information system, in which case NSE's partners must comply with the security requirements that may be passed on to them by NSE. Furthermore, the data shall be processed in accordance with the applicable European regulation.

#### PROTECTION OF ASSETS

Whether they belong to NSE or are entrusted to it, all NSE employees must treat all such assets, whether tangible (telephone, computer, vehicle, etc.) or intangible (information systems, telecommunications networks, software, intellectual property: business secrets, patents, etc.) in a professional, ethical, and legal manner, with responsibility and loyalty and in accordance with the interests of NSE.

In order to protect all its assets, NSE lays down rules and principles, the correct application of which is ensured and controlled by the designated managers or referents, notably through training/awareness-raising. This is particularly the case for the security officer who carries out on-site checks on NSE's classified sites.

# AN IMPERATIVE & CONTROLLED CHARTER

## 1. MANDATORY NATURE

This Charter of Ethics and Corporate Responsibility is displayed in all NSE premises, as well as on the website <https://www.nse-groupe.com>.

It is binding on all NSE employees; each NSE site manager in France and abroad ensures that it is communicated and respected.

It is also binding on all NSE partners in the context of commercial contracts, regardless of the form in which they are concluded.

It is specified that the General conditions of purchase and General terms and conditions of sale of NSE expressly refer to the present Charter and consequently, any order or purchase based on these documents implies adherence to the Charter of ethics and corporate responsibility.

## 2. MONITORING & REPORTING

Any employee or partner of NSE who has knowledge of:

Breaches of the commitments set out in this Charter of Ethics and Corporate Responsibility, in particular with regard to the fight against corruption, committed in the context of the execution of a commercial agreement,

Civil or criminal convictions, in France or abroad, for violations of laws and regulations relating to ethics and in connection with the commitments herein set out,

Or who may have an ethical concern, should, in addition to the possibility of addressing the external authorities, report this in writing to

**signalements.ethique@NSE-GROUPE.COM**

Abrest, December 1st 2025

Jérôme **FABRE**  
Chairman of the Management Board



Alain **ROCHER**  
VP Services  
Member of the Management Board



Laurent **DEBARET**  
Financial and Administrative Manager  
Member of the Management Board



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ADMINISTRATIVE HEADQUARTERS  
ZA LA TOUR  
03200 ABREST FRANCE

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