

Matelec's Human Rights policy and Code of Business Ethics and Conduct apply to its branches, employees, board members and directors. Matelec expects subcontractors and other parties temporarily assigned to perform work or services for the Company, to follow the Human Rights Policy and Code of Business Ethics and Conduct in connection with the relationship and work with Matelec. Failure to do so can result in the termination of the relationship with Matelec.

**The Company abides by local labor law and supports the principles contained within the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the ILO Core Conventions on Labour Standards.**

Matelec's Human Rights Policy and Code of Business Ethics and Conduct serve as a set of guiding ethical principles intended to inform Company representatives of personal and professional obligations towards the Company. It is based on the core values of the Company and is designed to assist in decision-making and handling work situations professionally and fairly, to maintain the highest professional standards of integrity.

## **FAIR WORKING RELATIONSHIPS**

**Matelec's most valuable asset is its employees.**

Matelec seeks to provide a work environment where all employees have the opportunity to reach their full potential and contribute to its success while preserving and respecting basic human rights and the dignity of each individual. The Company emphasizes personal integrity and believes that long-term sustainable results are the best measure of an employee's performance.

Matelec strives to treat its employees fairly and honestly while maintaining a safe, secure and healthy workplace. Matelec prohibits child labor and does not employ individuals under 18 years of age.

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## **AN INCLUSIVE ENVIRONMENT, FREE OF DISCRIMINATION, HARASSMENT & VIOLENCE**

### **Matelec seeks to create a work environment where people feel comfortable and respected, regardless of individual differences, competency, employment status or personal characteristics. Matelec is committed to equal opportunities and a workplace free from any form of discrimination.**

The Company provides equal employment opportunities regardless of race, creed, color, religion, age, gender identity, nationality, or disability. Employment decisions such as hiring, promotion and termination will be based on individual qualifications and merit. Matelec seeks to treat everyone equally through the implementation of fair and proper policies and procedures clearly communicated to all employees through different communication channels.

Matelec is committed to maintaining a work environment free of all forms of harassment, whether physical, verbal, sexual or psychological. In keeping with this commitment, Matelec shall not tolerate any violence under any circumstance. Violence may include the act of physically or psychologically harming another, pushing, harassing, intimidating, coercing, displaying weapons, damaging reputation, threatening, or talking of engaging in any of those.

It is the responsibility of every employee and manager to enforce this policy. Anyone subject to abuse, threat, intimidation or assault in the workplace may refer to the Grievance policy and procedure to report the circumstances of the behavior and seek help.

## ALCOHOL & DRUG FREE WORKPLACE

It is forbidden to be involved in unlawful consumption, possession, manufacturing, distribution, sale or purchase of any illicit substance, drug or alcohol in any manner that may impair your ability to perform your assigned duties, violate the laws or otherwise adversely affect the business and its internal and external community at large.

## SMOKE FREE WORKPLACE

Matelec is keen on ensuring a healthy, smoke-free environment for both employees and customers.

**Smoking is not allowed in company buildings or work areas at any time. Smoking is only permitted during break times in designated outdoor / indoor smoking zones.**

## CONSUMERS, CUSTOMERS, SUPPLIERS & COMPETITORS

**Matelec refuses to engage in unfair, deceptive or unethical business practices.**

In all its business dealings with consumers, customers, suppliers and competitors, Matelec commits to:

- Avoid any unfair or deceptive practice and always present its services and products in an honest manner.
- Treat all customers and suppliers honestly, fairly and objectively.
- Select suppliers based on merit, expecting them to compete fairly and vigorously for its business.
- Compete vigorously and with integrity.

## BUSINESS GIFTS, PAYMENTS & ENTERTAINMENT

Matelec strongly refuses to give or offer, directly or indirectly, anything of value to a third party, including a government official, political party or candidate, to corruptly influence that person's business decision or gain an unfair advantage. The Company business decisions are made on merit and never on bribery.

Gifts or entertainment given to or received from customers or suppliers must never influence, or appear to influence, business decisions. There shall be a legitimate business purpose for any business gift or entertainment.

The gesture shall be in good taste and consistent with the Code of Business and Ethics and local and international laws, respecting the givers and receiver's policies.

Customer and supplier meals and entertainment shall be reasonable in terms of cost and frequency, and consistent with Matelec Policies.

## **INVOLVEMENT IN CORPORATE SOCIAL RESPONSIBILITY**

Matelec believes in contributing to society. The Company contributes in a continuous manner to numerous benevolent institutions including universities, hospitals and many others.

## **RESPECT FOR CONFIDENTIALITY OF INFORMATION**

Working in Matelec, employees may receive or learn confidential information that has not been disclosed to the public. Confidential information includes all non-public information such as strategic and development plans, financial conditions, business plans, data, business records, customer lists, project records, market reports, employees list, business manuals, policies and procedures, and information relating to technologies and processes and all other information made available that, if disclosed, might be of use to competitors or might be harmful to Matelec, its suppliers or its customers.

**Matelec employees have a duty to protect confidential information.**

They shall not disclose confidential information to anyone outside Matelec, even to members of their own family, unless there is a clear business need to do so, the party receiving the information has signed a confidentiality agreement committing to maintain the information's confidentiality.

## AVOIDANCE OF CONFLICTS OF INTERESTS

Matelec employees have a duty of loyalty to Matelec. They shall avoid situations where their loyalties may be divided between the Company's interests and their own. All actual, apparent or perceived conflicts of interest between personal and professional relationships must be handled honestly and ethically. Employees must disclose any potential conflict of interest to their Direct Manager as soon as they become aware of it.

**The most occurring conflicts of interest include, but are not limited to:**

- Receiving any financial or personal benefit either personally or through a family member from a company that does or seeks to do business with Matelec.
- Owning equity in a competitor or in a company that does or aims at doing business with Matelec.
- Serving on the board of directors or providing consulting services to a company that does or aims at doing business with Matelec.
- Having outside business interests that could affect job performance because of the amount of time and attention diverted from responsibilities to Matelec.
- Benefiting from Business Relationships made through Matelec in a way that will harm Matelec's interests.

## MATELEC ASSETS

Employees are required to preserve all Matelec assets and to use them only for business purposes.

It includes but is not limited to company facilities, machinery, equipment, tools, vehicles, computers, technological assets, voicemail, e-mail and Internet access.

Company assets shall be used for proper purposes in a manner consistent with the Code including those related to discrimination, harassment and intellectual property.

Abusing company assets in any way will lead to disciplinary action or termination.

# CODE OF CONDUCT

## **MONITORING & COMPLYING TO THE CODE OF CONDUCT**

Matelec expects all its employees to be guided by both the letter and the spirit of this Code.

All employees are expected to abide by responsible and ethical behavior, and to act with integrity on a daily basis.

It is impossible for this Code to answer all questions. For that, the Company relies on each person's judgment and integrity. Employees are encouraged to seek guidance when a situation may not be clear by referring to their Direct Manager or HR who shall respond to questions about this Code.