



Ethical Charter

bacteam
group

April 2022

SUMMARY

THE ETHICAL CHARTER	3
Objectives of the Ethical Charter	3
Implementation of the ethical charter	3
COMPLIANCE WITH LEGISLATION	4
OUR COMMITMENTS AS A COMPANY	5
Clients	5
Suppliers and subcontractors	5
Fair practices and compliance with regulations	5
Gifts, invitations, donations and sponsorship	5
Fight against corruption and conflict of interest	5
Respect for confidentiality and data protection	6
Protection of company assets.....	6
Fight against fraud, money laundering and terrorist financing	6
Respect for industrial and intellectual property rights	6
Respect for human rights.....	7
Hygiene, Health and Safety	7
Abolition of child labor.....	7
Prohibition of all forms of forced or compulsory labor.....	7
Working time and remuneration.....	7
Moral and sexual harassment.....	7
Elimination of discrimination	8
Equal opportunities on the basis of merit and competence	8
Freedom of expression, association and the right to collective bargaining.....	8
OUR COMMITMENTS AS A RESPONSIBLE CORPORATE CITIZEN	9
Responsibility for the environment.....	10
Compliance with environmental laws and regulations	10
Precautionary principle	10
Circular economy and waste management	10
Promotion of social responsibility	10
ALERT PROCEDURE	11
The right to whistleblowing	11
Alert procedure	11
Conclusion	12

PREAMBLE

With a singular identity for more than seventy years, we at PACTEAM GROUP are committed to our customers, and wish more than ever to give meaning to our mission: to support our customers in the enhancement of their products by personalized and avant-garde proposals and to favor a partnership of trust focused on a 360-degree service.

Thus, the choices we make are guided by our values: service, quality, craftsmanship, responsiveness and passion. The development of our activities is firmly in line with the desire to build lasting relationships with our customers and partners, based on mutual trust and interest. Likewise, each of our employees is an ambassador of these values, and acts, in all circumstances and in all places, with integrity. Indeed, we consider that respect for business ethics and the fight against corruption are demanding and unavoidable rules.

This is why we wish to concretize our commitment through this Ethical Charter, which aims to formalize our business ethics policy, set the standards and ethical principles of reference for our employees, and bring them to the attention of all the stakeholders of PACTEAM GROUP.

This Ethical Charter was adopted by the Board of Directors of PACTEAM SA, of PACTEAM EUROPA SRL and of PAC TEAM AMERICA INC before being circulated to all employees in the Group and all the stakeholders.

THE ETHICAL CHARTER

OBJECTIVES OF THE ETHICAL CHARTER

This Ethical Charter aims to set the standards and principles that employees and associates of the Group must follow when faced with ethical dilemmas in their workplace. It also allows all PACTEAM GROUP stakeholders to act responsibly.

The PACTEAM GROUP's ethical principles are to:

- act with integrity and a sense of responsibility;
- comply with laws and regulations;
- respect the dignity and rights of everyone;
- act with respect for the natural environment and promote the sustainability.

If the employees have questions about ethics, it is important to refer to this Charter. For any question, they can also ask for clarification from their manager. They can also contact the Ethical Committee.

This Ethical Charter is complemented by an alert system.

IMPLEMENTATION OF THE ETHICAL CHARTER

This Charter is addressed to all PACTEAM GROUP entities as well as to all employees and other stakeholders, for all their activities.

The principles set out in this Charter enable PACTEAM GROUP to maintain and strengthen the trust of its customers and stakeholders.

Each employee of the Group must know, respect and ensure that the values and commitments of this Charter are applied.

Failure to comply with part or all of this Charter may be subject to sanctions, subject to compliance with local, national and international regulations and laws relating to disciplinary law.

ETHICAL COMMITTEE

To ensure the Group's ethical approach, PACTEAM GROUP has set up an Ethical Committee. It is composed of members appointed by the Group Management. It is intended to support the ethical approach of PACTEAM GROUP and can be consulted for any question relating to the application of this Charter, internal guidelines, principles and policies and/or of applicable laws and regulations. It shall ensure the application of the Charter within the Group and ensure the proper functioning of the alert system, in the context of possible violations of this Charter, internal guidelines, principles and policies and/or of applicable laws and regulations.

COMPLIANCE WITH LEGISLATION

PACTEAM GROUP undertakes to comply with the laws and regulations relating to the principle of loyalty in force in the countries where it operates.

The PACTEAM GROUP's ethical principles of business conduct aims to respect the following key international references:

- the United Nations Universal Declaration of Human Rights and the European Convention on Human Rights;
- various International Labor Organization conventions, in particular conventions 29, 105, 138, 182 (child labor and forced labor), 155 (occupational health and safety), 111 (discrimination), 100 (equal remuneration), 87 and 98 (freedom of association, protection of the right to organize and collective bargaining);
- the United Nations Convention on the Rights of the Child;
- the 10 Principles of the United Nations Global Compact and associated Sustainable Development Goals (SDG);
- the UNGP (United Nations Guiding Principles on Business and Human Rights);
- the United Nations Women's Empowerment Principles.

This Ethical Charter integrates the policies and regulations of the various countries in which PACTEAM GROUP is present. It is also necessary to refer to the regulations and standards defined in the workplace.

It is the responsibility of each of the Group's employees to know and comply with the laws and regulations in force as well as the company's policies and directives related to their fields of activity.

OUR COMMITMENTS AS A COMPANY

PACTEAM GROUP aims to build and maintain lasting relationships based on trust with all its stakeholders. This trust is built over the long term on the basis of a continuous improvement approach.

CLIENTS

The priority of PACTEAM GROUP is the satisfaction of its customers. Thus, the Group is very attentive to their requirements and ensures that the service provided is always of the best possible quality. The relationship with customers is placed under the sign of honesty and transparency, in order to better understand expectations and thus create value.

SUPPLIERS AND SUBCONTRACTORS

PACTEAM GROUP attaches great importance to the fair and transparent choice of suppliers. Thus, they are chosen according to a transparent, fair and impartial purchasing and selection process according to predefined and explicit criteria: quality, cost, deadline and also taking into account the environmental and social impact of the products offered.

PACTEAM GROUP treats its suppliers honestly and fairly, in compliance with applicable laws and regulations. PACTEAM GROUP pays the suppliers in accordance with the terms provided for in the contracts. PACTEAM GROUP uses mediation to facilitate the amicable settlement of any disputes arising during the execution of the contract.

FAIR PRACTICES AND COMPLIANCE WITH REGULATIONS

PACTEAM GROUP's suppliers adopt ethical behavior in commercial relations and undertake to comply with the laws and regulations relating to the principle of loyalty in force in the countries where they operate and in the countries of destination of the products. They ensure compliance with the rules of competition. Any unfair practice is prohibited.

GIFTS, INVITATIONS, DONATIONS AND SPONSORSHIP

The employees of PACTEAM GROUP must under no circumstances submit to the practices of gifts or invitations, or any form of gratuity. When a gift or invitation is received as part of the employee's duties, it is essential to keep his hierarchy informed and be transparent. It is important to ensure that the gifts received are in accordance with the ethical principles of PACTEAM GROUP.

Donations and sponsorship deals must be transparent and justified. Any planned donation to a charitable organization must have been audited and approved in advance.

FIGHT AGAINST CORRUPTION AND CONFLICT OF INTEREST

In the exercise of its activities, PACTEAM GROUP refuses and condemns all practices related to corruption or influence peddling. We have "zero tolerance" for corruption. We fight against any form of corruption, active or passive and exclude from any situation that may present a conflict of interest. It is essential to pay attention to any practice aimed at influencing a business decision.

It is essential for an employee to inform the management in the event of an actual or potential conflict of interest that could influence every judgment and decision, in accordance with the alert procedure detailed in this Charter.

RESPECT FOR CONFIDENTIALITY AND DATA PROTECTION

PACTEAM GROUP undertakes to keep confidential the technical, commercial and financial information communicated by its suppliers and customers and to protect their personal data in compliance with the regulations in force. Customer and supplier information is kept secure. Before sharing information with someone outside PACTEAM GROUP, it is important to check if it can be communicated. In addition, PACTEAM GROUP undertakes to keep only the data necessary for its activities.

PACTEAM GROUP recognizes the value of its employees' data, respects and protects their privacy.

PROTECTION OF COMPANY ASSETS

The employees of PACTEAM GROUP must protect the assets and resources entrusted them. The resources and assets must be used in connection with their professional activities.

QUALITY AND TRANSPARENCY OF FINANCIAL INFORMATION

PACTEAM GROUP is committed to ensuring that all its financial information is accurate and presented in a transparent manner. These financial documents are kept secure.

FIGHT AGAINST FRAUD, MONEY LAUNDERING AND TERRORIST FINANCING

We require our stakeholders in the conduct of their activities to ensure that the source of all their funds is legal and complies with laws and regulations relating to the fight against money laundering and the financing of terrorism. We consider that each employee has a role to play on a daily basis in order to fight against fraud, by exercising particular vigilance regarding the protection of information related to everyone's responsibilities, in order to protect the organization from any misappropriation or fraudulent use of its tools, data, or any other resource.

Respect for industrial and intellectual property rights

PACTEAM GROUP undertakes to respect intellectual and industrial property rights and to comply with the rules of national and international law; it is prohibited from exploiting, by the manufacture, sale, or use of the property of a third party, any trademark, patent, industrial design, or copyright.

OUR COMMITMENTS AS AN EMPLOYER

PACTEAM GROUP is committed as an employer to promote a healthy and safe working environment for its employees, and ensures the dissemination of its social responsibility throughout its value chain. The Human Rights are respected and PACTEAM GROUP ensures that there was no discrimination or harassment of any form.

RESPECT FOR HUMAN RIGHTS

We are committed to respecting and promoting the fundamental principles and rights and comply with the laws in force in each country where we operate. We also ensure respect for human rights throughout our supply chain, and monitor the practices of our suppliers.

HYGIENE, HEALTH AND SAFETY

The health and safety of PACTEAM GROUP employees are one of our priorities.

We strive to maintain a safe and healthy working environment that complies with the relevant regulations. We undertake to implement a health and safety policy that aims to guarantee each employee a working environment that does not entail any danger to health and safety, to maintain an environment in which the dignity of persons is respected, and to take all necessary measures to limit accidents at work that may occur in the treatment of common tasks of an employee.

ABOLITION OF CHILD LABOR

PACTEAM GROUP attaches particular importance to the prohibition of child labor. Our suppliers and subcontractors are prohibited from employing children in violation of the provisions of the Conventions of the International Labor Organization.

PROHIBITION OF ALL FORMS OF FORCED OR COMPULSORY LABOR

PACTEAM GROUP attaches particular importance to the prohibition of forced and compulsory labor or slavery or any other practice of enslavement or involuntary labor. Our suppliers and subcontractors are prohibited to use forced and compulsory labor or slavery or any other practice of enslavement or involuntary labor.

WORKING TIME AND REMUNERATION

PACTEAM GROUP undertakes to comply with all the regulations to which it is subject relating to remuneration, social benefits and working hours, the management of overtime, task wages and any other element of remuneration and limits on working hours.

All forms of work, including overtime work, are voluntary. Workers are free to leave their employment as long as they comply with the notice period specified by law.

MORAL AND SEXUAL HARASSMENT

PACTEAM GROUP refrains from using any verbal or physical threat, physical violence, sexual abuse or any form of harassment. Every employee has the right to respect and human dignity.

ELIMINATION OF DISCRIMINATION

PACTEAM GROUP shall refrain from any discrimination, exclusion or preference in particular based on ethnic origin, gender, religion or belief, political opinion, trade union activity, disability, age and sexual orientation in recruitment and professional development and ensures equal treatment.

EQUAL OPPORTUNITIES ON THE BASIS OF MERIT AND COMPETENCE

PACTEAM GROUP is committed to promoting equal treatment and equal opportunities.

PACTEAM GROUP allows its employees to benefit from professional training allowing the development of their skills.

FREEDOM OF EXPRESSION, ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

PACTEAM GROUP recognizes and respects the employee's right to freedom of expression, association and collective bargaining.

PACTEAM GROUP also recognizes the right of its employees to join a trade union organization of their choice.

OUR COMMITMENTS AS A RESPONSIBLE CORPORATE CITIZEN

We are aware of the impact of our activities on the environment and strive to minimize this ecological impact. It is the responsibility of each employee in the Group to try to reduce this impact as much as possible. The environment is a major concern of PACTEAM GROUP and we are committed to its protection. We deploy an environmental policy on issues relating to the circular economy, and the fight against global warming, in particular.

At PACTEAM GROUP we strive to fulfill our mission, support our customers in the enhancement of their products with personalized and avant-garde proposals and favor a trusted partnership focused on 360-degree service. It is from these values that we have since formalized our commitment and structured our CSR approach, in order to improve the impact of our activities and create shared value, for all the people who work daily on our sites, but also for our partners and suppliers.

Aware of the societal and environmental challenges that we must, together, address, we always go further in improving the quality of the working conditions of our employees, reducing the environmental impact of our activities, in synergy with our partners.

As a leading player in our industry, it is fundamental to achieve these goals that our suppliers share the same values. This is why we invite them to take note of our commitments, materialized by this Charter and to associate themselves with our ambitions, to perpetuate the relationships of trust and to be part of a process of continuous progress.

To meet the major challenges of sustainable development and develop its product offering, PACTEAM GROUP is demonstrating its CSR commitment around the following three pillars:

- propose tailor-made, relevant and optimal solutions and by building lasting business relationships built on listening, commitment and responsiveness;
- to be an exemplary employer, concerned about the well-being and development of our employees. People are at the heart of our corporate strategy;
- position ourselves as a key partner in the materialization of our customers' environmental approaches.

RESPONSIBILITY FOR THE ENVIRONMENT

We work to take into account each of our environmental impacts related to all our activities, for our employees, for our customers, for our partners and we always go further in reducing this impact. We have an Environmental Policy that we want to bring to the attention of all our stakeholders.

PACTEAM GROUP and its employees respect eco-gestures and good environmental practices in the workplaces and in the realization of everyone's daily activities.

COMPLIANCE WITH ENVIRONMENTAL LAWS AND REGULATIONS

We are committed to complying with and enforcing existing environmental regulations in force in each country where we operate and meet requirements related to air, soil, water and pollution quality.

We have adopted environmental measures to ensure the continuous improvement of our environmental impact performance throughout our value chain.

PRECAUTIONARY PRINCIPLE

We adopt the precautionary principle and set up an environmental management system, making it possible to quickly detect, identify and assess potential environmental risks, in particular through the implementation of control systems through permanent and reliable measures. We take all appropriate measures to mitigate environmental risks or eliminate them where possible, and encourage this approach with our suppliers.

CIRCULAR ECONOMY AND WASTE MANAGEMENT

One of our actions to reduce the impact of our activities on the environment is our commitment to the circular economy. We make sure to apply responsible waste management, working to reduce it at source as well as exploring ways of reprocessing, recycling or reuse.

GHG EMISSIONS AND SUSTAINABLE USE OF RESOURCES

We are committed to limiting our impact on the environment by assessing and reducing our greenhouse gas emissions, measuring our energy and water consumption of our activities. We implement programs to improve our energy efficiency, optimize the use of water and non-renewable natural resources or products that are not environmentally friendly.

PROMOTION OF SOCIAL RESPONSIBILITY

We are committed to promoting a social responsibility approach among our suppliers and subcontractors, in order to allow the dissemination and application of the principles of this Ethical Charter throughout the value chain.

ALERT PROCEDURE

THE RIGHT TO WHISTLEBLOWING

The right of ethical alert is a right given to PACTEAM GROUP employees allowing them to report a situation that does not comply with the principles set out in this Charter.

If an employee of PACTEAM GROUP or any other stakeholder is confronted with facts, allegations, or conduct that may contravene the principles of this Charter must react in accordance with the alert procedure detailed below.

ALERT PROCEDURE

Any employee or stakeholder who becomes aware of violations of this Charter, internal guidelines, principles and policies and/or of applicable laws and regulations is invited to raise their concern and/or ask for guidance.

Employees can contact their manager or one of the members of the Ethics Committee.

Stakeholders can raise their concern to their contact person(s) at PACTEAM GROUP or one of the members of the Ethics Committee.

PACTEAM GROUP provides a mechanism to contact the Ethics Committee by:

- Email: ethics.ch@pacteam-group.com
ethics.italy@pacteam-group.com
ethics.usa@pacteam-group.com
- White box: available at any workplace.

This procedure is also made available to anyone who would like to obtain further information or clarification concerning this Charter, the laws, regulations, or principles of internal conduct.

The Ethical Committee will be responsible for processing the alert as soon as possible. An investigation will be set up in a confidential manner where the anonymity of the whistleblower is guaranteed and as a result of this investigation, appropriate measures will be decided and implemented.

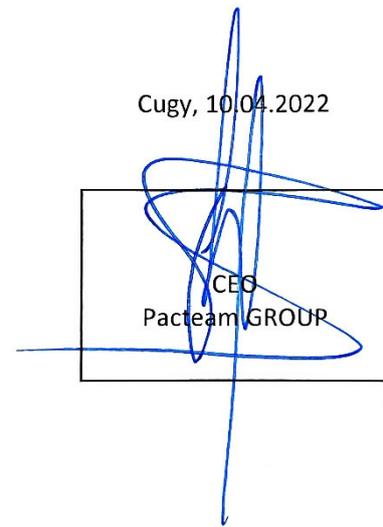
Any information given during this survey will be communicated only to persons who need to know this information. No report in good faith shall be subject to threats or reprisals against the person who wrote it. No disciplinary sanction is taken against persons who have made use of these channels in good faith, even if the facts subsequently prove to be inaccurate or unfounded and/or do not give rise to any proceedings or sanctions.

CONCLUSION

PACTEAM GROUP undertakes to guarantee the application of this Charter and the proper functioning of its alert procedure, by bringing to the attention of all its stakeholders the principles of this Charter and by ensuring the proper promotion of it throughout its value chain, wherever the Group operates.

PACTEAM GROUP counts on the commitment and responsibility of all to uphold the values of this Charter and continue to make ethical principles and the fight against any form of corruption, discrimination, or violation of respect for Human Rights, unavoidable and imprescriptible rules in business relations.

Cugy, 10.04.2022



CEO
Pacteam GROUP