

Code of ethics of ADS

Ethics cannot be decreed, it must be worked on and maintained on a daily basis

This code of conduct and ethics allows us to put into words and in a lasting way our know-how. It has been established so that each member of the Board of Directors, the management, the supervisors and the employees can remember the fundamental values and principles that must guide all our activities. At ADS, we work continuously to provide our customers with the best products and the most efficient solutions. As a key player in economic and social life, we need our customers to place their trust in us fully and sustainably. To achieve this, our behavior must be beyond reproach. All of our tasks are based on strong values that are supported by our employees, who live them to the full in their daily responsibilities. It is essential that we all keep in mind the rules set out in this code of conduct and ethics, in order to contribute to the success of our company while fully meeting the expectations of our customers.

This Code of Ethics is part of Compagnie des Alpes' policy to fight corruption, money laundering and the financing of terrorism.

We respect the standards and good practices

We are committed to complying with all national and international regulations applicable to our areas of activity. We also take into account good practices in corporate governance.

We value the integrity of each individual and the respect of others

The health and safety of our employees is of paramount importance to us and we do everything possible to preserve it. In this respect, we respect and ensure compliance with the company's rules on occupational safety. We ensure that the most suitable personal and/or collective protective equipment is used.

We maintain respectful and humane working relationships. We defend and promote the principle of equality between women and men. We seek to promote diversity as much as possible. Harassment and discrimination in any form will not be tolerated under any circumstances. We expect our employees to behave in a respectful manner towards each other. In particular, they must refrain from any comments or behavior constituting physical, moral or sexual harassment, discriminatory acts or comments that undermine the personality of others. Such actions constitute serious misconduct that may lead to the application of sanctions, up to and including the most severe, as set out in our internal regulations, as well as criminal and civil sanctions.

The company has a sexual harassment or gender-based harassment referent appointed from among the representatives of the Social and Economic Committee, specially trained to deal with situations that may arise.

We have a structured and evolving quality social framework

We consider social partnership to be an important element of corporate and human resources management. In this respect, a climate of understanding and trust must prevail in the working relationship, both to ensure the company's efficiency and to satisfy the aspirations of our employees. We strive to create and maintain a healthy and collaborative work environment.

Over the years, the company has built up a framework of reference through negotiations with social partners and staff representatives, consisting of a number of company agreements guaranteeing a very high level of social status for all employees, over and above the legal provisions or agreements.

Through a constructive relationship, the entire system evolves each year. Regulatory and societal changes are taken into consideration

We do not allow ourselves to be corrupted and we are trustworthy.

Confidential information and personal data

We undertake to collect and process all confidential information or personal data concerning our customers, suppliers and employees in accordance with the relevant legal provisions. In particular, we do not provide any access to confidential information or personal data to unauthorized persons, either internally or externally. We refrain from any misuse of such data, whether for our benefit or for the purpose of granting an advantage to a third party.

In accordance with the European Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, we have appointed a DPO within our company. Everyone (customer, supplier or employee) has the possibility to send him a request concerning personal data on a dedicated email address or by mail.

Corruption

Integrity is at the heart of everything we do. It is a priority that is part of our ongoing commitment to respect our stakeholders such as employees, shareholders, customers, partners and public authorities, and to do everything possible to ensure that our business is conducted legally, responsibly, transparently and ethically.

We refuse all forms of corruption and do not give any undue advantage, whether to business partners to obtain a contract or to authorities to favor a particular behavior. We also do not accept such undue advantages. At most, we may offer and accept courtesy gifts or invitations as part of normal business practice.

In this respect, we comply with our internal guidelines. We respect the rules of free competition and reject all agreements aimed at limiting competition.

The company has a code of conduct drawn up by the Compagnie des Alpes Group, which is widely distributed internally, and all managers and employees potentially concerned have received training to ensure that it is respected and rigorously applied.

Conflicts of interest

Our work is in no way guided by personal interests and we must make every effort to avoid conflicts of interest. If, under certain circumstances, a conflict of interest cannot be avoided, we undertake to discuss it openly and to take all appropriate measures to avoid harmful consequences. In particular, we will openly discuss internally any personal or financial interests related to suppliers, competitors or other third parties that could influence the objectivity of our work. In such cases, members of corporate bodies or employees affected by a conflict of interest will not take part in decisions.

We are honest with our customers and business partners

We provide adequate and quality products and services to our customers. We strive to understand our customers' needs, to be dynamic and innovative. We must be loyal and trustworthy in all circumstances. Mandates given to third parties are given in accordance with the applicable legal provisions (in particular those relating to public procurement) and our internal guidelines

We protect the environment with the objective of sustainable development

We are respectful of the environment and our actions are in line with sustainability. We are aware of our social and environmental responsibilities and ensure optimal management of our assets and natural resources.

This commitment to sustainable development is embodied in a working group called

"The Hive" within the company. "La Ruche" is a group of people committed to driving the environmental transformation of the Domaine des Arcs. Its mission is to initiate and implement new actions in favor of sustainable development; to have an overview of all the company's issues and their progress.

We take action in the event of non-compliance with the code of conduct.

Cases of code violations

Any case of non-compliance with the Code of Conduct and Ethics must be reported to the immediate supervisor so that appropriate action can be taken. If the supervisor is involved or likely to be involved, the employee may report the matter to the next higher level of management or to a member of management. Retaliation against an employee for reporting in good faith or refusing to participate in wrongdoing will not be tolerated.

Inappropriate behaviour

If you are a victim or witness of inappropriate behavior, you can contact Human Resources. The information gathered will be treated with the utmost confidentiality by specially trained HR partners. Moreover, no action will be taken without the consent of the employee who reported the harassment.

This Code of Ethics was approved by the Board of Directors on April 29, 2022.

LES ARCS