

Code of conduct

The purpose of this Code of conduct is to set principles and rules governing behavior which every Group employee, whatever their level of responsibility, must know and apply, according to the legislative and regulatory framework applicable in their country. This Code is not intended to cover every situation, but rather provide a clear vision of Fives' fundamental values. It is based on the Group's social responsibility policy, which particularly includes Fives' commitment to the principles of the U.N. Global Compact¹.

This Code applies without exception to all Group Companies. All Group employees must convey these values in their professional relationships.

This code was drawn up on the understanding that all employees are committed to these values and will make them known, explain their content and defend them if necessary.

1. Respect for people, property and the image of the Company and Fives

- Respect for people

It is a Group principle to reject any form of discrimination, especially in relation to gender, age, race, social and cultural background, disability, political and religious opinions, as well as in relation to union activities, to recognize and accept differences and reject stereotypes and prejudices and, finally, to have respect for private affairs.

The proper fulfillment of the Group's activities also depends on every employee working in a work environment free of any moral or sexual harassment.

Every employee must ensure that their actions do not infringe the rights and dignity of their colleagues. Everyone must be aware that this type of behavior is prohibited.

All employees must make these principles central to the way they approach their internal and external professional relationships.

- Respect for property

Respect for property belonging to the Group, both tangible (buildings, installations, machines, vehicles, IT and communications equipment, supplies, etc.) and intangible (industrial property, know-how, etc.) is vital to the prosperity which benefits every employee. It is therefore everyone's duty to protect and preserve this property against damage, theft or misappropriation, and especially not use it for personal purposes, unless explicitly permitted.

¹ *The United Nations Global Compact is a strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption (www.unglobalcompact.org)*

- Respect for the Group's image

Since the quality of Fives' image and that of each Company, as well as the reputation of their products and services, is one of the conditions for their growth, employees must refrain from any act that could harm this image or reputation.

2. Respect for health, safety and the environment

- Health and safety

The health and safety of Group employees is a major priority for Fives. All employees must contribute to the compliance with obligations relating to protection of life, health and safety, within the scope of their own responsibility.

- Respect for the environment

All employees must comply with environmental protection obligations and as far as possible contribute to minimizing the Group's environmental footprint, reflecting the Group's efforts in this field.

3. Reliability of information, respect for confidentiality

- Honesty of information transmitted

In order to make information transmitted as effective as possible, all Group employees shall supply and transmit to their management documents and information that is as relevant and complete as possible.

- Respect for confidentiality – use of confidentiality agreements

Employees who come to possess information belonging to Group Companies that is to be kept confidential, such as information about products, designs, technical projects, sales plans or financial projects, must ensure that this information is only communicated to persons who need to know it in the context of their work, and especially not outside the Group.

Information which employees come to access during fulfillment of their employment contracts remains confidential after the contracts end.

Confidential information must only be communicated outside the Group when covered by confidentiality agreements. These agreements must have previously been reviewed by the Fives Legal Department in cases where they may lead to unusual risks in relation to Group standard models (e.g. in terms of fines).

Use by a Group employee, for personal purposes, of such information is forbidden.

4. Respect for customers and suppliers

- Respect for customers

In order to acquire and maintain customers' trust in the activities and products of Group Companies, employees shall respect customer rights and strive to develop constructive and long-term relationships in the interest of the Group. In particular, they shall only make realistic, considered and responsible commitments to their customers.

- Respect for suppliers

Suppliers shall be treated fairly in all countries in which the Group operates, with suppliers' selection based on objective criteria and following competitive tenders as a general rule.

5. Capacity to commit on behalf of the Company

It is forbidden for employees to make commitments on behalf of the Company beyond the scope of their authority.

6. Ban on active or passive corruption

Group employees whose work brings them into contact with third parties, particularly suppliers and customers, shall refrain from acts of either active or passive corruption.

No Group employee shall for instance offer or promise a gift in any form other than symbolic.

Similarly, no employee shall request or accept a gift, other than symbolic, or any other benefit from any entity.

Moreover, it is strictly forbidden for Group employees to directly or indirectly request, accept, propose or offer any bribe or other benefit.

In the event of doubt regarding the type or extent of such gifts, either offered or received, and in all other cases in which they receive direct or indirect requests or offers of particular benefits, employees must consult their management.

7. Conflicts of interest and anti-competitive practices

- Prevention of conflicts of interest

A conflict of interest may occur when the prospect of a personal gain influences an employee's professional behavior. The Group expects every employee to not act to the detriment of the Group. Employees are expected to disclose to their supervisor any personal material transactions or personal relationships that reasonably could be expected to give rise to a conflict of interest.

- Prevention of anti-competitive practices and unfair competition

Employees, particularly those who have links with customers and competitors, must comply fully and in good faith with applicable rules and laws in respect of competition and prevention of anti-competitive practices.

8. Understanding of the Code

In the event of doubt as to interpretation of the Code, employees are encouraged to consult their supervisor.

9. Reporting breaches of the Code

Any employee may, if they suspect in good faith a breach of the Code, notify their supervisor, the Company's Chief Executive Officer or the Head of Fives Corporate Social Responsibility Department. The Company will use its best efforts to keep reports or complaints confidential during any investigation whenever possible.

10. Responsibility in the event of breach of the Code

In the event the Code is shown to be breached, the employee concerned shall be disciplined appropriately.