

PANDROL

MODERN SLAVERY STATEMENT 2020



PANDROL

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PANDROL

(A) IDENTITY

This is Pandrol Australia Pty Limited's first Modern Slavery statement, which outlines the steps we have taken to identify, manage and mitigate the specific risks of modern slavery in our operations and supply chain.

Pandrol Australia is part of the global company Pandrol, who are owned by the global company Group Delachaux, who's head office is situated in France.

As part of the Group Delachaux business, Pandrol Australia must follow the policies and procedures of Delachaux in accordance with its overall Corporate Social Responsibility (CSR) Program.

Pandrol is committed to ethical business practices and respecting human rights including conducting operations that are free from human trafficking and forced labour. The Code of Ethics of the Delachaux Group (Appendix A) defines and illustrates the behaviour that is expected from all employees of the Delachaux Group, no matter where they are or what type of contract they have.

This statement describes the Pandrol's organisation to minimise the human trafficking and forced labour risk in its operations and supply chain, and its commitment that the company, its subsidiaries, its employees and its suppliers shall comply with all applicable laws.

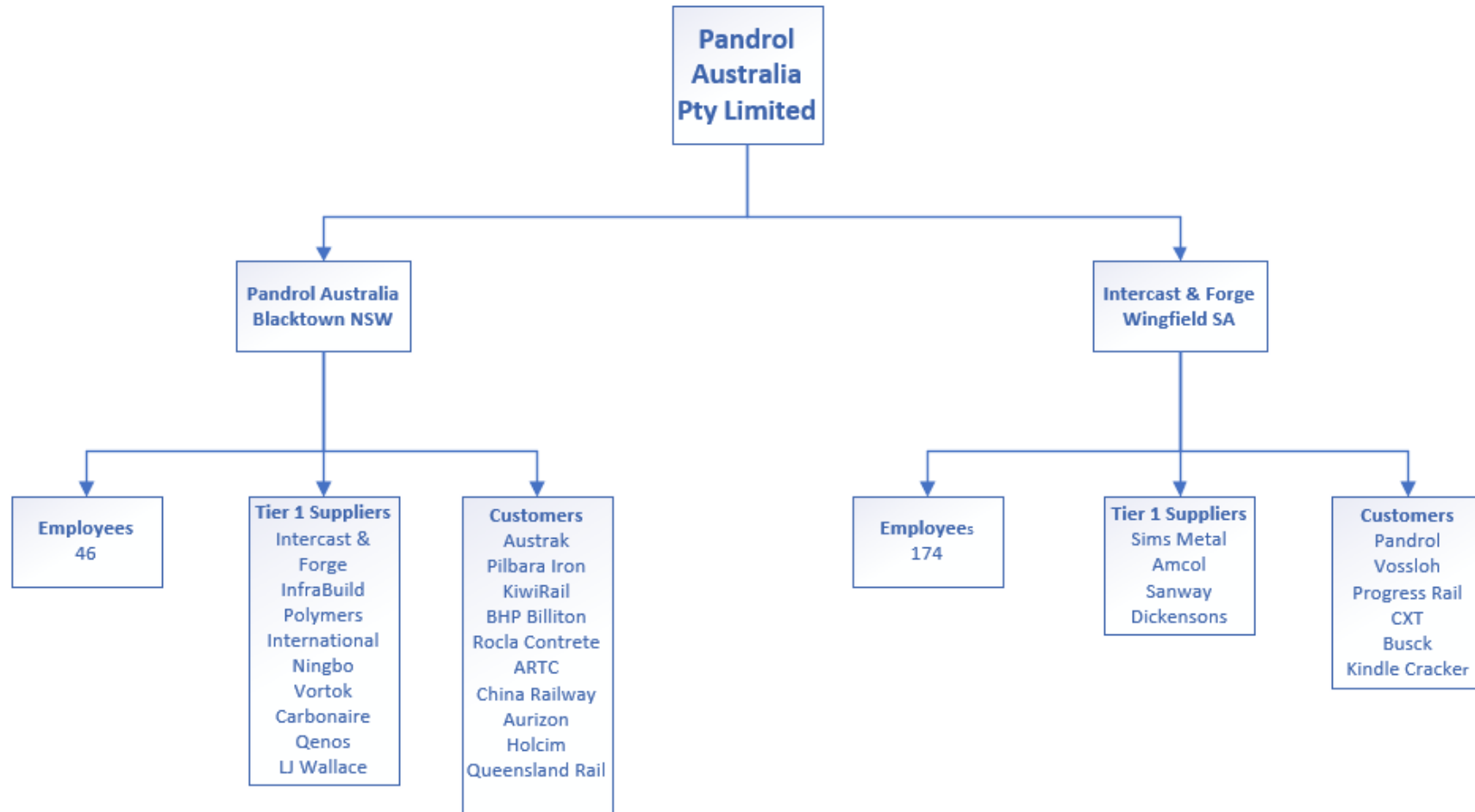
SCOPE

The Pandrol Group is a global player in mission critical engineered solutions in the rail industry. Pandrol provides solutions to half of the world's railways.

The Delachaux Group is a signatory to the UN Global Compact. The Global Compact is the world's largest corporate sustainability initiative. Launched in 2000, it now federates more than 12,000 signatories in 170 countries around 10 universal principles in Human Rights, Labour, Environment and Anti-Corruption, including the elimination of forced and compulsory labour.

PANDROL

(B) STRUCTURE, OPERATIONS AND SUPPLY CHAINS



(C) RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS

Code of Ethics – Human Rights Policy

As stated in the Code of Ethics, it is our policy to respect human rights and remain alert to possible human rights violations.

We protect and promote fundamental human rights in the workplace and in our supply chain.

We prohibit child labour and respect a minimum employment age of 18, except under legally established programs (e.g. apprenticeships).

We prohibit forced labour, slavery and human trafficking.

We are on the look out for any sign of human rights violation in our supply chain.

Risk Assessment

Pandrol conducts an annual assessment to identify, analyse and priorities its exposure to the risk of bribery, as detailed in our Anti-Bribery Procedure. Pandrol considers that this mapping is also relevant to evaluate the risk of human trafficking and forced labour in its operations and its supply chain.

Employee training and Awareness

All employees of Pandrol are expected to read the Code of Ethics and comply with its principles. An e-learning awareness module to the Code of Ethics is to be followed at least once by all employees.

As a member of TRACE International, Pandrol has access to TRACE's Avoiding Trafficked Labour e-learning course. This course is available to all employees on the Learning Management System platform and mandatory for all employees of the Procurement function.

A whistleblowing system has been put in place across Pandrol to report any questions or issues related to Ethics. Any potential issue on Human Rights arising through this channel will receive proper attention and be investigated. Also, the Code of Ethics as well as the CSR Procedure of Delachaux describe the Group's policy on whistleblowing.

(D) ACTIONS TAKEN BY THE REPORTING ENTITY

Third Party Management

As written in the Code of Ethics, it is the Delachaux Group's policy that everyone working on our behalf and representing our interest sign up to the same ethical standards as we do.

Risk mitigation actions are performed, based on the risk level assessed and the type of third party. This can translate into"

- Due diligences
- Contractual clauses, ensuring that our third part adheres to the Code of Ethics
- Training on anti-bribery

The third parties of Pandrol have also access to the whistleblowing system of the company to report any questions or issues related to Ethics.

The Procurement Policy must be followed at all times.

(E) REPORTING EFFECTIVENESS

Monitoring

Several indicators are used to manage the risk of modern slavery across Pandrol, such as:

- Annually track the number of employees undertaking the Code of Ethics awareness module
- Annually track the number of employees undertaking the Anti-Bribery training
- Track the number of due diligences performed on 3rd parties.

(F) PROCESS OF CONSULTION

Pandrol will use the consultative and reporting mechanism in its policies referred to in the statement to engage with entities it controls or owns about modern slavery risks and due diligence responses.

Remediation

If cases of human trafficking and modern slavery are detected, Pandrol will create a remediation plan that will provide redress for individual victims were Pandrol caused the human trafficking and/or forced labour, as well as remediation of non-conformance with this statement caused by deficiencies in Pandrol's internal controls or processes.

The Pandrol third parties and suppliers are expected to create a remediation plan that will provide redress for individual victims where the third part or supplier would have caused the human trafficking and /or forced labour, as well as remediation of non-conformance with this statemen caused by deficiencies in the third part's or supplier's internal controls or processes.

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) and approved by the Board of Pandrol Australia Pty Ltd as the principal governing body on 15 January 2021.



Signature of Pierre Barthram

Managing Director and Board Member of Pandrol Australia Pty Ltd

PANDROL

Annex A – Code of Ethics

Code of Ethics
Our day-to-day commitment

CONDUCTIX wampfler **PANDROL** **DCX CHROME**

PANDROL

① GROUPE DELACHAUX

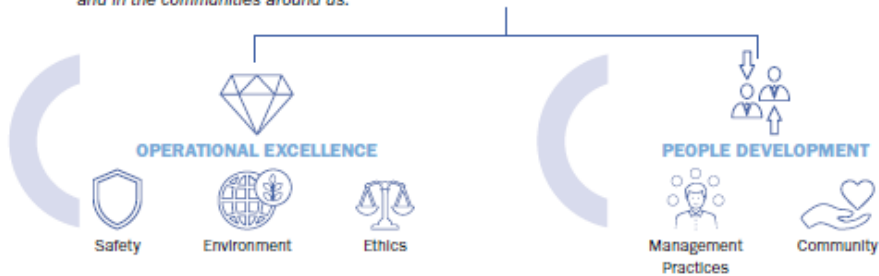


Who We Are

*We are empowered teams
Constantly progressing
And working together
to put the customer first*

we Our Worldwide Engagement

“ As market leaders, we want to lead by example in our practices and have a positive footprint for sustainable development.
We commit to:
Act as a strong and innovative link in our customers' value chain while controlling the impacts of our operations.
Foster the well-being and the development of people -in our teams and in the communities around us. ”



PANDROL

DCX CHROME



Message from the CEO
Guy Talbourdet

The Delachaux Group has been delivering solutions to customers worldwide for over a century. Our leading global brands (Pandrol, Conductix-Wampfler & DCX Chrome) are renowned for their reliability, expertise and innovativeness. The close to 3,000 employees in over 35 countries are empowered teams, constantly progressing and working together to put the customer first. As a signatory to the UN Global Compact, we are committed to corporate social responsibility in every country.

Ethical behaviour is the cornerstone of our long-term performance. In today's world, responsibility and performance are linked. Markets, customers and regulations are increasingly global. If we break the law or act unfairly, we will harm our reputation and jeopardize the company's success. This is the reality of the world in which we operate and we must be mindful of it.

Ethical behaviour is first and foremost an opportunity:

- > To be the masters of our collective destiny and true to the entrepreneurial spirit of the Delachaux family;
- > To develop long-term relationships with customers and suppliers, creating shared value; and
- > For you to blossom in an environment of respect in which you can express yourself.

That is why you are reading this Code of Ethics.

Our Code of Ethics defines and illustrates the behaviour that is expected from us all, no matter where we are on the planet.

This Code outlines the universal principles and values we must all respect. It also provides you with the tools to identify risk situations and find the right answer in the common interest.

I want you to know that you are not alone in difficult situations. This Code of Ethics explains how to raise your concerns and seek advice. A culture of dialogue and openness is key to our future success. That is how we will continue working with pride, passionately serving customers and collaborating to ensure the Delachaux Group will continue to grow sustainably over the coming century.

Thank you for your commitment.

Guy Talbourdet,
Chief Executive Officer, Groupe Delachaux, January 2019

WE SUPPORT



The Delachaux Group is a proud signatory of the Global Compact, the world's largest corporate sustainability initiative. Launched in 2000, it now unites over 12 000 signatories in 170 countries around 10 universal principles in the areas of Human Rights, Labour, Environment and Anti-Corruption.



Using the Code of Ethics in your daily life



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Using the Code of Ethics in your daily life



Code
of Ethics

> What is the Code of Ethics and to whom does it apply?

This Code of Ethics defines and illustrates the behaviour that is expected from all employees of the Delachaux Group, no matter where they are or what type of contract they have. It can also be incorporated into relationships with customers, suppliers and other third parties.

This Code of Ethics is reviewed annually.

As an employee of the Delachaux Group, you are expected to know this Code of Ethics and behave accordingly.



If a local law differs from the Code of Ethics, which should I choose?

Always take the highest ethical standard:

- if local law is stricter than the Code of Ethics, follow local law.

- If the Code of Ethics is stricter than local law, follow the Code of Ethics.

We always respect the laws of the countries in which we operate.

> How should the Code of Ethics be used?

The Delachaux Group operates in a wide variety of countries, with different laws, cultures and practices. We always respect the laws and regulations of our host countries.

We recognize, however, that some situations are complicated. Those "grey areas" are where an individual or a company can be exposed. The consequences of such misbehaviour can be extremely serious and harmful to a person or business.

This Code of Ethics aims to guide you in how to act in such situations.

The following pages outline the behaviour expected from the Delachaux Group employees in a range of common circumstances. There are also links to Group Policies and Procedures available on our Intranet:

[INSIDE > RISK MANAGEMENT > GROUP POLICIES & PROCEDURES](#)

This Code of Ethics cannot however anticipate and address every situation. Therefore, whenever you face a situation that is not covered by this Code of Ethics, start by asking yourself these questions:



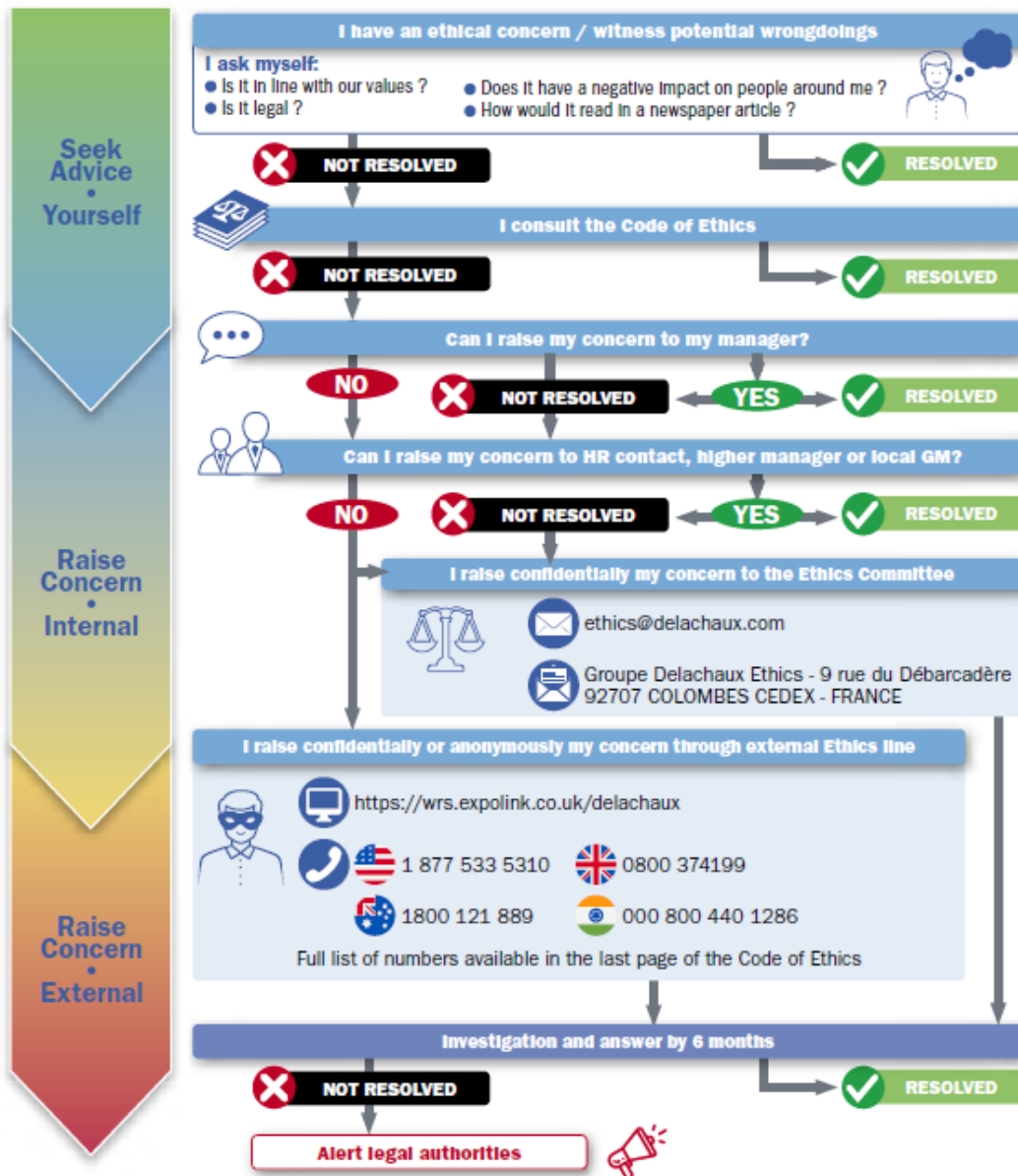
It should give you a sense of the right decision. If you have doubts, know that you are not alone. At Delachaux, we think that it is always good to:

- > disclose the matter;
- > discuss it openly;
- > and seek advice from a manager or internal experts.

> How can I get advice and raise concerns?

The Delachaux Group encourages a culture of openness where employees can seek advice and raise concerns. It is our common responsibility to ensure that our behaviour and that of our business partners complies with this Code of Ethics.

If you are unsure what to do or whether to report, in good faith, behaviour contrary to this Code of Ethics? Please follow the following steps:



Using the Code of Ethics in your daily life



Code of Ethics

If you feel you cannot discuss your issue or raise your concern at local level you have two reporting options:

1. Internally

to ethics@delachaux.com or by letter to Delachaux Group Ethics Unit, 9 rue du Débarcadère, 92707 COLOMBES CEDEX, FRANCE. Your message will be treated in confidence.

2. Externally

either via <https://wrs.expollink.co.uk/delachaux> or by calling a dedicated hotline. You can choose to remain anonymous, provided this is legal in your country.

The Delachaux Group values openness and transparency. You will not suffer discrimination or persecution for raising concerns in good faith. Such discrimination or persecution will not be tolerated under any circumstances. Do not be afraid to share your concerns! You will receive support and someone will listen to you.



What happens when I make a report?

- Internal reports are received by the Corporate Social Responsibility (CSR) Manager of the Delachaux Group. They are then forwarded to the Delachaux Group Ethics Committee, made up of Delachaux Group COMEX members and supported by the CSR Manager. It decides how the investigation is to proceed.
- External reports are received by an independent expert. An interview specialist will ask you questions and send a report to the Ethics Committee, which decides how the investigation is to proceed.

What is the difference between confidential and anonymous reporting?

All reports are confidential. This means that only people who have a role in receiving or investigating the report will know your identity and the content of the report. The Delachaux Group encourages you to communicate all information you feel comfortable providing.

You may remain anonymous except where restricted by local law. Your identity, phone number or IP address will not be recorded or included in any report passed on to the Delachaux Group. What matters is what is being reported, not who reports it. In any case, do not be afraid of any retaliation for sharing your concern.

What is "good faith"?

Good faith means that you have provided information you believe to be comprehensive, honest and accurate at the time, even if you are later proven to be mistaken. It also means that any report that proves to be slanderous may lead to sanctions.



What is the role of the manager?

Your manager is your primary contact if you have any questions regarding appropriate behaviour. If you feel you cannot talk about your concern with your manager, please follow the process outlined on the previous page.

As a people manager, you must also:



- > lead by example;
- > act as a role model;
- > strive to inspire trust;
- > be open to dialogue with your team.

You also need to ensure your team has read this Code of Ethics and acts accordingly. But you are not expected to have the answer to every question. Do not therefore hesitate to follow the escalation procedure and discuss it with internal experts or your own manager.



What are the sanctions for not respecting the Code of Ethics?

Any breach of this Code of Ethics can expose you or the company. Failure to respect this Code of Ethics could ultimately be punishable by law or tarnish the company's reputation as a respectable business partner.

Any behaviour contrary to the Code of Ethics will be sanctioned in line with local HR Policies. Sanctions can include:



- > Oral reprimand;
- > Written reprimand;
- > Suspension; or
- > Termination of employment.



[CSR Procedure \(in English\)](#)



Operational Excellence

Operational Excellence means acting as a strong and innovative link in our customers' value chain while controlling the impacts of our operations.



Health and Safety

We have a right to a healthy, safe and secure working environment, and a responsibility to contribute to it.



Fair market practices

We compete fairly and help raise industry ethical standards.



Corruption and facilitation payments

We fight all forms of corruption, including facilitation payments.



Representation and lobbying

Everyone working on our behalf and representing us signs up to the same ethical standards as we do.



Conflicts of Interest

We always disclose potential conflicts of interest.



Gifts and hospitality

We never give or receive gifts in a way that could create a suspicion of bribery or a conflict of interest.



Environment

We strive to minimize our environmental impact throughout the value chain.



Company resources

We use company resources honestly and efficiently.



Communication

We protect the company's reputation.



> Health and Safety

We have a right to a healthy, safe and secure working environment, and a responsibility to contribute to it.

As a Delachaux Group employee, you have a right to a healthy, safe and secure working environment.

You must be informed about and trained in laws and regulations governing occupational health and safety.

You must:

- > Take every reasonable precaution to maintain a safe and healthy environment;
- > Immediately report to your site's safety manager or management all accidents, however minor, behaviour, installations or items likely to compromise the safety of our working environment;
- > Follow all safety instructions and warnings;
- > Always wear protective equipment in areas where it is indicated as being mandatory;
- > Ensure that your actions are not putting you or others at risk;
- > Know what to do in an emergency in your workplace.

Safety is also a priority during business trips and team meetings.



The CEO is visiting our plant today. I have a meeting scheduled with him but I am late. On my way to the meeting room, I notice the floor is slippery...what should I do?

People might slip and get hurt: this is a safety issue. You must mark the danger (with a cone for instance) or solve the issue and then go to your meeting. Safety should be your top priority. Nothing is more important.

My manager insists that I wear gloves to perform my task as per the job description for this activity. In my 20 years with the company I have never used gloves and never had an incident. I think I will just wear the gloves when s/he is around and remove them when s/he leaves. Is that OK?

You should discuss your concern with your manager and come to an agreement. As a manager, you need to ensure that your recommendations are understood and endorsed by your team. Otherwise, you run the risk of creating an environment of pretence. Safety is not about pretending you do something. It must be a shared culture understood and practiced by everyone.



① GROUPE DELACHAUX



> Fair market practices

We compete fairly and help raise industry ethical standards.

We respect all industry stakeholders including competitors. We treat them the way we would like them to treat us. It is in our interest to have an industry in which business practices are reputable. As an industry leader, our role is to set good example and outperform our competitors legally and ethically.

We do not employ exaggerated claims or false advertising. Our products and services must stand on their own merits and quality. We do not make inaccurate or disparaging comments about competitors' products or services.

We never share confidential information such as price or terms and conditions of sale with competitors. We never enter into any agreements with competitors, either formal or informal, written or verbal:

- > to set prices or other terms of sale;
- > to coordinate bids;
- > to allocate customers, sales territories or product lines.

We only collect competitor intelligence through legal means such as reports, trade journals, public speeches and from customers in the context of matching competitor offers.



I recently met a competitor's salesperson at a trade show. I've known him/her for 10 years and we have become friends. We always have a drink together after the show. We naturally talk about many things, including business. Is that allowed?

You can be friends but you should be careful if discussing business not to share details that could break anti-trust or competition laws. This includes prices, volumes and general market terms and conditions. Violating these laws may result in severe legal penalties for our company and criminal charges for you and your friend. If you are in doubt, seek guidance from the company's legal department. If you suspect an antitrust violation report it immediately.

By mistake, I received an email from a customer that was intended for a competitor. It contains all their pricing details for an upcoming bid! I want to share it with my team as this will be valuable information. As I didn't steal it, would that be legal?

You should not make use of confidential information, even received by mistake, as this would violate anti-trust and competition laws. You should notify your customer of the mistake and delete the email. In case of doubt, contact the company's legal department.

I hired someone who used to work for a competitor. This is a small industry and there are always people moving from one company to another. Can I ask him/her to share information from the competitor?

No. You should primarily hire an employee based on his/her skills and not because s/he has potential confidential information from a competitor.





> Corruption and facilitation payments

We fight all forms of corruption, including facilitation payments.

Corruption is harmful for the communities in which we operate and can harm the company's reputation. No matter where you are in the world, you are subject to anti-corruption laws.

Corruption is any unlawful or improper behaviour that seeks to gain an advantage through illegitimate means.

Examples of forms of corruption:

- > bribery;
- > abuse of power;
- > extortion;
- > fraud;
- > deception;
- > collusion;
- > cartels;
- > embezzlement and;
- > money laundering.



Within these, "facilitation payments" are defined as small payments made to expedite routine legal governmental actions, such as issuing permits or releasing goods held in customs. We do not authorize facilitation payments except in extreme circumstances in which individuals are left with no alternative to protect against loss of life, limb or liberty (extortion).

Should you become aware of any potential or actual corrupt arrangement or agreement, report it immediately using the Ethics Line procedure discussed page 6.

You must be even more careful when working with governmental officials. This is a very broad definition that includes any person:

- who works for or is an agent of a government or government-owned/controlled entity;
- a representative of public international organizations;
- employees of regulatory agencies or departments.

If you are in doubt, please contact the legal department or the CSR manager.



A labour administration official came into the office for a surprise audit. S/he found out that we are not legally compliant. S/he claims s/he has the power to shut down our plant unless we pay him/her €1,000 in cash. We have a busy production schedule and cannot afford to lose time. Can I pay him/her?

No! A labour administration official is a government official; paying him/her would be illegal. His/her demand could also be an extortion. The appropriate response is maximum openness: talk to your manager, to his/her manager. If forced to pay, ask for a receipt.

You say that we need to fight all forms of corruption. This sounds great, but in the real world you sometimes need to get your hands dirty or business will go to competitors! We all know how it works.

People have many excuses to justify corruption:

- complacency (we've always done it...);
- cultural practice (that's the way it works here...);
- siege mentality (you can only compete if...).

The fact is that you are both breaking the law and perpetuating corruption. You are NEVER alone and ALWAYS have alternatives to corruption. Whenever you feel uncomfortable, turn to your manager or anti-bribery expert for advice.

We just lost a big project from the local rail company. I have heard that our competitors offered several dinners to rail company officials including cash payments whereas we were prevented from doing so by our anti-bribery policies. This doesn't seem fair!

We all commit to the principles of fair competition. We should try to understand why we lost before assuming our competitors behaved unethically. If we have proof that our competitor broke the law, we should seek legal advice on the appropriate course of action.



[Anti-Bribery Procedure \(in English\)](#)

① GROUPE DELACHAUX



> Representation and lobbying

Everyone working on our behalf and representing our interests signs up to the same ethical standards as we do.

We rely on a whole series of third parties and intermediaries for vital business tasks. We must ensure that these partners behave ethically, even if they are not part of our company. If they behave badly, this could harm our reputation or make us criminally liable.

Above all, we must be extremely cautious when working with agents or other intermediaries retained to obtain orders and permits, including:

- > sales representatives;
- > customs agents;
- > lawyers;
- > lobbyists; and
- > consultants.

We never hire anyone to do the 'dirty work' and must know what intermediaries are doing on our behalf.

We do not engage in political activities in the company's name or in the workplace. We do not make political contributions out of corporate funds.

We may lobby directly or indirectly (through trade associations for instance). Lobbying means contributing to the public decision-making process on regulations likely to affect our operations. The purpose is to make sure that decision-makers understand the impact of such regulations.

You can share this Code of Ethics with third parties and invite them to read it.



[Sales Agents Management Procedure \(In English\)](#)



I want to sell my products in a new market and just need product certification from the national technical office. This is taking longer than expected and my manager is pressing me to launch. I am introduced to an intermediary who says s/he can facilitate the certification process. S/he is asking me for €80,000, where the normal price is €8,000. When I ask him/her why, s/he says that this is the "normal approved process". What should I do?

There is obviously a high risk of corruption in working with this intermediary (see Corruption & Facilitation Payments page 11). You must always be aware what your agent is doing on your behalf. Negligence or wilful blindness is never an acceptable defence in criminal prosecutions. You must discuss this with your manager and always take the most ethical course.

We have been working with the same sales agent for over 20 years. S/he always has been very successful in winning business. I was, however, surprised by the level of his/her commission. Upon further investigation with our legal team, we found that we had never signed a contract with him/her. I am afraid that if we change anything we may lose him/her. What should we do?

You should always sign a contract with an intermediary, especially a sales agent. Agents are known to be major conduits for bribes. Giving the relationship a contractual basis thus protects both the agent and the company. Commission rates should not exceed 7%.

The mayor of our city is running for re-election. One of his/her team members came to our plant asking for a financial contribution for the campaign. S/he insisted that it would be in our best interest to give a substantial amount of money. What should I say?

We never use company funds for political purposes. This could be considered corruption of government officials, which is a criminal offense (see page 11 Corruption and Facilitation Payments). Besides, if this person insists on you donating, or implicitly threatens you, this is also a criminal offense called extortion. You must always resist extortion and consult your legal department or the CSR manager.



> Conflicts of interest

We always disclose potential conflicts of interest.

We always have an obligation to act in the best interests of the Delachaux Group. Conflicts of Interest arise when our personal interests or those of someone close to us interfere with the Group's interests.

You must be able to identify and disclose potential conflicts of interest. Having a conflict of interest need not be a violation of the Code of Ethics. However, failing to disclose it or concealing it may expose you to sanctions.

You can discuss potential conflicts of interest with:

- > your HR contact;
- > your manager;
- > your legal advisor; or
- > via the afore-mentioned Ethics Line.

To determine if you have a conflict of interest that needs to be disclosed, ask yourself these questions:

- > Do my outside interests influence, or appear to influence, my ability to make business decisions?
- > Do I stand to benefit from my involvement in this situation? Does a friend or relative stand to benefit?
- > Could my participation in this activity interfere with my ability to do my job?
- > Is the situation causing me to put my own interests ahead of the company's interests?
- > If the situation became public knowledge, would I be embarrassed? Would Delachaux be embarrassed?

Common situations in which a conflict of interest may occur are when you (or someone close to you):

- > Have a financial interest in a competitor company, supplier or customer;
- > Engage in activities that compete with, or appear to compete with, the company's interests;
- > Use company assets, information or resources for personal benefit or the benefit of others;
- > Hire, supervise or have a direct or indirect reporting line to a family member or someone with whom you have a romantic relationship;
- > Have outside employment that negatively affects your job performance or interferes with your professional responsibilities.



We are hiring a new Sales manager. A friend of mine is working for a temp agency specialized in sales managers. Can I share the contact with my local HR? Isn't that a conflict of interest?

Even if leveraging personal or professional network can benefit the company, recommending someone could be a conflict of interest. The following questions will help you to distinguish between networking and conflict of interest:

- > Are you working in the sales department?
- > Do you have a personal interest in working with this temp agency?
- > Are you forcing your local HR to work with this person?

"Person close to you" sounds very broad. What does it mean?

Identifying a conflict of interest often means using our best judgment. However, «Person close to you» means:

- > Firstly, your family and friends;
- > More generally, any person with a sufficiently close relationship so that they may:
 - influence your ability to make objective decisions;
 - affect your judgement.

One of our suppliers is listing on the stock market and I would like to buy some stock. They are a strong company, with great products and I am sure it will be a good investment. Can I?

Even though your involvement may only be financial, there may be a conflict of interest depending on your position in the company.

Are you...

- > in direct contact with them?
- > in the procurement department?

Ask yourself these questions and then discuss the issue with your manager or seek legal advice.

① GROUPE DELACHAUX



> Gifts and hospitality

We never give or receive gifts if it could create a suspicion of bribery or a conflict of interest.

The practice of giving or receiving gifts or business hospitality (meals, entertainment) is legal and customary in many countries.

Some gifts however can create the impression that they are designed to influence the judgement and decisions of the recipient to obtain undue advantage. You must be very careful with their nature, amount, context or frequency.

They could otherwise be deemed to be bribes and expose you and the company to criminal liability. A bribe is anything of value promised or given to gain an improper advantage.

As a result, whenever you receive / give a gift please always use your best judgment and ask yourself:

- > Am I giving this gift to obtain a specific advantage?
- > Is receipt of this gift likely to influence my business decision?
- > How would it be perceived if it were made public?

If you are in doubt as to whether gifts and entertainment are appropriate, please discuss it with your manager and make sure that the decision is fully transparent.

The giving of gifts and hospitality must be properly authorized and accounted for. Gifts of cash or cash equivalents (gift vouchers), regardless of the amount, are strictly prohibited.

Please be aware that giving or offering even the simplest gift or meal to a government official may be illegal. You should seek the approval of your manager or legal advice before issuing an invitation to a government official. For the definition of 'government official' please see page 11 Corruption and Facilitation payments.



[Travel and Expenses Policy \(In English\)](#)



I am meeting a customer to discuss a major upcoming project. I would like to invite him/her for lunch after the meeting in a nearby restaurant. I know I must be careful and that is why I chose a very ordinary restaurant. Is that OK?

The value of the gift is not the only material criterion. In that case, timing is important. During tendering, you must refrain from any behaviour that could be perceived as bribery. We advise you to postpone the lunch until the final decision has been made.

I am negotiating a new contract with a customer. My contact is refusing to examine our proposal, arguing that our competitors are "nicer" to him. I assume s/he wants something from me but s/he has not asked for anything specific. What should I do?

You should firstly share your doubts with your manager and ask his/her advice. It certainly seems that this person is looking for a kickback or other improper advantages. You might also want to report this ambiguous behaviour to this contact's manager as this is illegal. In any event, do not give way to temptation, you could be accused of bribery. Healthy negotiation is based on the quality of our products and the value they generate for customers, not on our willingness to give gifts to their employees.

One of our suppliers sends us a box of chocolates every Christmas. Should we refuse?

Giving Christmas gifts is customary in many Western countries. You can accept the gift, unless this supplier is currently involved in a tender. If you feel uncomfortable, you can:

- > share the chocolates with your colleagues;
- > organize a raffle;
- > send the box back, explaining why.



> Environment

We strive to minimize our environmental impact throughout the value chain.

We respect the environmental laws and regulations in every country in which we operate.

When designing products, we try to establish the environmental footprint and minimise natural resource consumption.

When manufacturing products, we reduce the quantity of water and energy inputs. We promote the use of renewable energy and recycling of waste.

As a Delachaux employee, I try to be aware of the environmental impacts of my actions and seek to minimize them.



We are designing a new product and I found a material with better environmental performance. However, the price is higher than standard components and we are under strong price pressure from customers. What should I do?

Firstly, it is great that you managed to establish the environmental footprint of your product. It will allow you to make conscious choices amongst the various options. Price, quality, safety and environmental footprint are key criteria in product design. You should discuss with your manager how to find the best possible balance. And remember, environmentally-friendly options are not always more expensive!



I read in a local newspaper that a start-up is making floor tiles from waste. Our plant produces a lot of sand moulds that go into ordinary waste. Should I explore this further?

Of course! What is waste for us may be a resource for someone else. You should contact this start-up or share the information with the relevant colleagues. This can save money and reduce our environmental impact!



① GROUPE DELACHAUX



> Company resources

We use company resources honestly and efficiently.

Resources include physical assets as well as Intangibles.

You should only use company resources for legitimate business purposes and protect them from theft, loss, damage, or misuse. Improper use of company resources hurts us all and affects the operation and financial performance of the Delachaux Group.

Even if we use some of these resources all the time and on occasion outside the office (laptop, cell phone, copy machine), we must remember that they belong to the company.

We should also endeavour to maintain a proper work-life balance and only use these resources during business hours.



Can I check my personal email or browse websites for personal purposes on my business laptop?

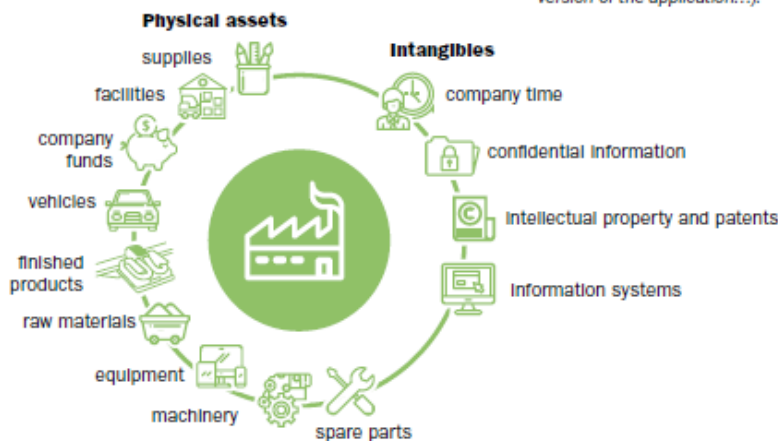
You can use your laptop for personal use so long as this is occasional, reasonable and does not interfere with your job.

There are a lot of wood pallets stacked outside the factory, waiting to go to landfill. I know someone who would like to purchase them. Can I sell the pallets and get a commission?

It is always best to recycle waste rather than putting it in landfill. You should therefore discuss this opportunity with your site manager and check if there are any regulatory barriers. Keep in mind, however, that such goods belong to the company. Therefore, you are not allowed to sell them by yourself or receive a commission on the sale.

One of our suppliers developed an application to improve product traceability. You flash a QR Code and have access to a series of information on sourcing or environmental impact. Unfortunately, I do not have a business smartphone. My manager advised me to use my personal smartphone. Is that OK?

It is the responsibility of the employer to provide you with the appropriate resources to do your job. Your manager should not ask you to use personal resources to perform work-related tasks. If this application is necessary for your job, you should work with your manager to find a solution to allow you to do your job (get a company smartphone, access a PC version of the application...).





> Communication

We protect the company's reputation.

Sharing information is essential in today's world. The Delachaux Group encourages regular internal communication through meetings, calls and newsletters.

Don't forget that information is valuable. The unauthorized disclosure of confidential information can harm our reputation and have a major business impact.

Confidential information is any non-public information that we use for commercial, promotional, industrial or financial purposes, from which a competitor may obtain advantage.

Only dedicated spokespersons may talk to the press or share financial information. If you are contacted by journalists, refer them to your site manager, your manager or your communications team.

You can only communicate public information about the Delachaux Group, such as that available on the company website, in the official Group presentation, in the latest issue of TRAME or in the annual report.

Be careful when using social media such as LinkedIn, Facebook or Twitter. If you use personal social media accounts, make clear that you are not speaking on behalf of the company and that any opinions are personal. You should not post pictures or videos of the company unless you have the right to do so.



I have been asked to give a talk about my job in my former school / university. Should I decline as I am not a designated company spokesperson?

You may certainly give a talk! It is always a great personal honour and a good opportunity to talk about the company. That said, you should only use publicly available information. Be careful not to disclose anything confidential such as future projects, products or financial results. If in doubt, contact the communications team.

I have read the definition of "confidential information" but it seems somewhat vague.

The scope of confidential information may indeed vary depending on the context. It is always advisable to ask yourself if you have the right to disclose a piece of information and imagine the consequences of doing so. When in doubt, seek the advice of your manager or communications team.

Our marketing manager invited us to join the company's LinkedIn group. S/he is asking us to "like" and "share" posts, but I am reluctant to do it as I want to maintain my privacy. What should I do?

Your social media account is strictly personal and does not belong to the company. It is therefore wholly up to you whether you like or share company posts



[Communications Policy](#)





People Development

People development means fostering the well-being and development of people in our teams and the communities around us.



Human rights

We always respect human rights and remain alert to possible human rights violations.



Diversity and Inclusion

We are an inclusive and equal-opportunities employer. Our employment policy is based on skills, professionalism and performance.



Anti-harassment

We treasure the right to respect and human dignity. We fight any form of harassment or violence.



Privacy

Everyone has a right to privacy and must be careful when using personal data.



Charitable giving

We play an active and positive role in the communities around us.



> Human Rights

We always respect human rights and remain alert to possible human rights violations.

We protect and promote fundamental human rights in the workplace and in our supply chain.

We prohibit child labour and respect a minimum employment age of 18, except under legally established programs (e.g. apprenticeship for teenagers 16 and above).

We prohibit forced labour, slavery and human trafficking.

We are on the lookout for any sign of human rights violation in our supply chain.



[Employment Policy \(in English - coming in 2019\)](#)

The Delachaux Group complies with:

- > UN conventions (20 November 1989, International Convention on the Rights of the Child);
- > the convention of the International Labour Organization (convention C138) regarding the minimum employment age (18) and the prohibition of forced labour.



My colleague's 14-year-old son has been hired for a 3-week summer job on the shop floor. We have always done this. Can this be considered child labour?

It is not because a practice seems normal that it is legal. You can only employ people under 18 in certain legally defined circumstances. You should raise any concerns with your local HR department.

I have a new employee who has been recommended by a temp agency. His CV says he is 19 but he looks younger. What should I do?

When hiring a new employee, you must always check his/her ID. Over 150 million children worldwide work: be careful when hiring a new employee, particularly in emerging countries.

You say we need to fight slavery. That sounds 19th century! Is it still a reality today?

There are an estimated 40 million people in modern slavery worldwide! The most common form is bonded labour (or debt bondage), where people need to work to pay off their debt.

Stay alert for signs of modern slavery in the company or supply chain. Simple questions to ask yourself:

- > Does the employee have a passport?
- > Is s/he free to move?
- > Does s/he receive little or no pay for his/her work?



> Diversity and inclusion

We are an inclusive and equal-opportunities employer. Our employment policy is based on skills, professionalism and performance.

Diversity is the sum of all our unique characteristics (see Image below).

Discrimination occurs when any of these characteristics are used in work situations such as when hiring or promoting people.

We do not tolerate any form of discrimination including based on:

- > Gender;
- > Health condition or disability;
- > Sexual orientation;
- > Marital status or family situation;
- > Religious beliefs;
- > Political opinions;
- > Trade union activity;
- > Physical appearance;
- > Age;
- > Ethnic, social, cultural or national origins.

We strive to attract, develop and retain a workforce that is as diverse as the world around us. We endeavour to ensure an inclusive work environment that embraces the strength of our differences.

We comply with the laws and regulations on discrimination in the countries in which we operate.

We ensure equal access to hiring, training, salary and career advancement.

We promote skills, expertise and exemplarity within the teams.



HR suggested I add a person with disabilities to my team. I know that diversity is important, but I am concerned that this person will often be on sick leave: this could disrupt the rest of the team. I am also afraid that I would be obliged to give him/her special treatment, leading to jealousy on the part of other team members.

These are preconceived notions. Experience shows that the presence of people with disabilities does not materially change work relations. Just like anyone else, in the case of candidates with disabilities, recruitment is based on skills. The only difference is that the compatibility of the job position is systematically reviewed. Some adaptation measures may be necessary but this is in fact rarely the case.

Does 'Diversity' mean I should only hire or promote women or people from ethnic minorities?

No, this is not what is expected. We hire on merit: therefore, you should select the best candidate for the job. But remember that diversity is not just limited to women and ethnic minorities. It includes other groups who are often discriminated against such as seniors.



[Compensation and Benefits Policy \(in English\)](#)
[Employment Policy \(in English - coming in 2019\)](#)





> Anti-harassment

We treasure the right to respect and human dignity: we fight any form of harassment or violence.

Harassment is described as any unwelcome behaviour or conduct that has no legitimate workplace function. Harassment intimidates, humiliates or offends another person or persons. Harassment (sexual and/or moral) may be defined by local regulations in your country.

Specifically, sexual harassment may consist of verbal, visual or physical conduct of a sexual nature that is unwelcome or that makes someone feel uncomfortable.

The pressure generated by harassment affects work performance, creating an intimidating, hostile or offensive work environment. It is therefore our collective responsibility to prevent and detect any harassment.

In harassment cases, the intention of the alleged harasser is irrelevant. What is important is how the employee being harassed feels as a result of the harassment. Therefore, if you suspect harassment is going on, you should never be afraid to talk about it and seek advice. You can also report harassment against your colleagues.



You can ask your HR department or manager about any applicable law in your country.



My manager can at times be very intimidating. I know s/he is pushing us hard to deliver quality work and that despite his/her temper s/he is a good person. However, at times s/he can really humiliate people, and it is affecting the morale of the whole team. Is this harassment?

Your manager is expected to challenge and drive his/her team to deliver quality work. This may mean that he/she will criticize or comment on the performance of team members. However, a people manager is also expected to treat team members with respect and act with due sensitivity. If you feel that you are not being treated in a professional manner, you should speak to your manager, to your HR contact person or to your site manager.

A new manager joined our team, and I really feel s/he is forcing me out. S/he only has negative feedback about my work. I am now afraid to make a mistake and even to come to work. Is that normal?

Harassment can take many forms. This includes deliberately setting a person up to make a mistake or creating physical and social isolation. You should first try to openly discuss the matter with your manager or talk to your local HR representative. In any case, you should not come to work fearful or put your health at risk.



> Privacy

Everyone has a right to privacy and must be careful when using personal data.

In the Delachaux Group, we need to store and process personal data, for administrative purposes or to maintain the customer database for instance.

Personal data is information, directly or indirectly, pertaining to an individual and potentially including sensitive information.

As a Delachaux Group employee, you have a series of rights relating to your privacy and personal data. Your local HR contact (or Data Protection Officer in European Union countries) can provide you with full details and answer any questions.

You must also be careful when processing personal data from other employees, customers and suppliers. Always be aware of where personal data is stored and for what purpose it is used. Only collect information that is necessary.

You must ensure that any third parties you work with, and with which personal data may be shared, comply with privacy regulations.

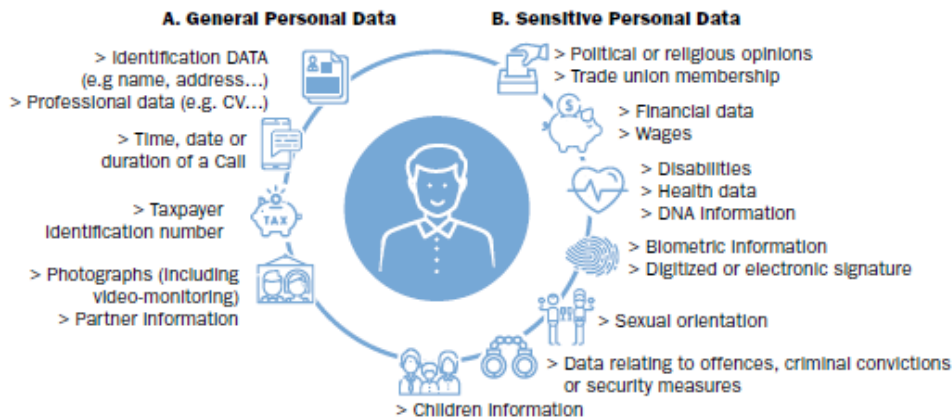


My business laptop was stolen and it contained personal data on customers and employees. What should I do?

This is a data protection breach. You must report it to your local Data Protection Officer (in the European Union) or to your local HR contact.

I took a picture of my team during a recent charitable event and I would like to publish it in the upcoming TRAME and on social media. Am I allowed to?

A picture is considered personal data. You will therefore need prior consent before using this picture in internal or external communications. A prior consent form can be obtained on the Delachaux Group Intranet or from the communications team.



[General Data Protection Policy \(in English - coming in 2019\)](#)



> Charitable Giving

We play an active and positive role in the communities around us.

Sponsorship or charitable donations are an opportunity to be a force for good outside the company and to support causes or Non Governmental Organizations (NGOs).

We encourage employees to act as responsible citizens in their free time and to engage in community activities. If the cause supported is consistent with WHO WE ARE and OUR WORLDWIDE ENGAGEMENT (see page 2), you can organize fundraising events in the workplace. In case of doubt, please consult your manager or local HR contact.

We can use company funds to support a governmental cause or an NGO, provided their values are consistent with our Code of Ethics. We view charitable donations as a long-term commitment. All actions, regardless of size, must be undertaken with a clear plan of how to develop the partnership over time.

Charitable donations can be used as disguised bribes. You should be careful to ensure that the amount, frequency or context of these donations not be viewed as bribery or a political contribution (see page 12 Representation and lobbying).

Whenever donating or establishing a partnership, you should consult your Corporate Social Responsibility expert.



I am involved in a bid for a new government contract. Part-way through the negotiations, I have been asked by a government minister to make a charitable donation to a local school charity. The amount is small relative to the business we plan to do. It is a good cause, so it will be beneficial for our image. Can I accept?

Charitable donations are generally a good thing but charities can be corrupt too, or act as vehicles for corruption. You should investigate this charity and do due diligence to verify that the funds are not channelled to other beneficiaries.

Moreover, as you are in negotiations, the donation is likely to be viewed as a bribe designed to influence the minister to award business.

Be aware that contributions linked to marketing activities are always a potential risk and should be avoided. That is why it is important to have a long-term view regarding your partnership development or commitment.

I volunteer in an association that promotes education. We are organizing a marathon to raise funds and I would like to spread the word within the company. Can I put an announcement up on our noticeboard?

Of course! Furthermore, if this cause represents an opportunity that is in line with our ethical values, you should speak to your manager to see if it would be possible to involve the company in a broader sponsorship of the event or even a partnership with the NGO. You could be the corporate sponsor for this project, and develop a meaningful long-term programme together. Big stories often start small!

Remember, it is always best practice to have a long-term view, and to develop partnerships that combine:

- > cash;
- > in-kind donation;
- > employee contributions;
- > skills-based sponsorship.





> Ethics Line

A solution dedicated to ethical concerns



By internet :

<https://wrs.expolink.co.uk/delachaux>



By phone:

Country	Freephone number	Alternative Number (if applicable)
Algeria	9824027244 (Mobile access not guaranteed)	
Argentina	0800 6662603	
Australia	1800 121 889	
Austria	0800 281700	
Belgium	0800 71025	
Brazil	0800 891 8807	
Canada	1888 268 5816	
Chile	123 002 004 12	
China (North - China Netcom)	10800 852 2112	00800 3838 3000
China (South - China Telecom)	10800 152 2112	
China (Whole)	400 120 3148 (Local Rate Number)	
Czech Republic	800 142 428	
Eire (Republic of Ireland)	1800 567 014	
Finland	0800 116773	
France	0800 900240	
Germany	0800 182 3246	
Hungary	06800 14863	
India	000 800 440 1286	
Indonesia	007 8030 114626	001 803 0441 1201
Italy	800 783776	
Japan	00531 78 0023	0081 368 908 675 (Local Rate Number)
Korea (South)	00308 442 0074	
Malaysia	1800 885 530	1800 805 597
Mexico	01800 123 0193	
Morocco	0800 092 326	
Netherlands	0800 022 9026	
Panama	001 800 507 3321	
Poland	00800 442 1245	00800 441 2392
Russia	810 800 260 81044	810 800 2058 2044
Singapore	800 4411 140	
South Africa	0800 990520	
Spain	900 944401	
Sweden	0200 285415	
Switzerland	0800 563823	
Thailand	001 800 442 078	
Turkey	00800 4488 29578 (No Mobile Access)	00800 4463 2066 (No Mobile Access)
United Arab Emirates	8000 441 37873	
United Kingdom	0800 374199	
United States of America	1 877 533 5310	

Mobile access cannot be guaranteed to all these telephone numbers.

Where there is no Freephone Telephone Number available please use the following instructions to make a Reverse Charge/Collect Call:

- 1> Call your Country Operator
- 2> Ask for an International Reverse Charge/Collect Call to: 0044 1249 661808
- 3> The Operator will call through and speak to a dedicated Hotline Operator at Expolink who will accept the call and obtain an Interpreter if required.
- 4> The Country Operator will then disconnect from the call and a Report can be made as normal.