



## ETS KELTHOUM SERVICE (EKS) ETHICAL CHARTER

### EKS' FUNDAMENTAL ETHICAL PRINCIPLES

#### PRINCIPLE 1

##### Act in compliance with laws and regulations

At all times, all EKS employees must comply with international, national and local regulations and rules of professional conduct relevant to their activities, as well as with the ethics and compliance policies.

All employees and customers of EKS must comply with the substance, subject to the mandatory provisions of these specific rules.

#### PRINCIPLE 2

Conduct yourself with honesty and promote a culture of integrity. Honesty and integrity must govern business relationships, interpersonal relations and daily professional practices. It is imperative that everyone acts with honesty in all circumstances and contributes to promoting a culture of honesty and integrity. Based on this principle, EKS attaches the utmost importance to the exemplary behavior of its employees. In the selection of its partners, EKS ensures that a high standard of honesty and respect for human rights is maintained. Accordingly, EKS encourages the reporting of ethical incidents and no employee may be penalized for having used a reporting system in good faith and unselfishly, or for having refused to perform an act that he or she considers contrary to the ethical principles of EKS.

#### PRINCIPLE 3

##### Demonstrate loyalty

For EKS, the quality of a relationship is based on the loyalty of the parties involved, especially in the execution of contracts. This includes keeping commitments and not making any promises that EKS cannot keep.

Whenever an EKS employee communicates with his or her interlocutors, he or she does so in good faith, in a constructive spirit, respectful of the interests of each party and with a concern for sincere information. The principle of transparency, which guides EKS, does not prevent employees from respecting business secrecy, within the framework of applicable laws.



EKS expects its employees to abide by the principles set forth in this Charter and in return provides them with the necessary protection when challenged if they have acted in good faith within the scope of their duties.

#### **PRINCIPLE 4**

##### *Respecting others*

In the belief that a sustainable company is one that combines economic development with human progress, EKS attaches the utmost importance to the values of tolerance and respect for others, which are binding on all employees in the course of their professional activities and which govern EKS's relations with them.

Respect for others implies treating everyone fairly, giving equal importance to each individual, and calls for reciprocity, with each person having rights to assert but also duties to fulfill, with respect to others and to the company as a whole. This principle covers respect, in all circumstances, for the rights of individuals, their dignity, their uniqueness and respect for different cultures. It also applies to the tangible and intangible assets belonging to others and more generally to the preservation of heritage and the environment. It guides EKS' policy on gender equality, respect for privacy, promotion of diversity and the fight against all forms of discrimination, protection of health and safety at work and in particular the prevention and punishment of all situations of harassment. It underpins all internal and external policies of EKS and must inspire even the way conflicts are resolved.

Tolerance, which means kindness and openness to others, excludes all forms of extremist behavior.

#### **APPLICATION OF THE EKS ETHICS CHARTER**

##### **The Ethical Charter and its 4 Principles**

Applies:

To all EKS employees and entities. EKS expects its employees to act in accordance with the company's ethical principles in all circumstances, regardless of their job, their level of responsibility and the people they deal with.

Working in a healthy climate contributes to the smooth running of EKS and the development of its employees. This is why EKS pays the utmost attention to the quality of life at work.

Respect and trust must guide relations between employees as well as dialogue with social partners. From the director to the employee, everyone has an obligation never to act in a way that raises any doubt about the company's ethics. Fundamental ethical principles must be promoted by employees.

The CEO and his colleagues at EKS are the ultimate promoters of the Ethics Charter and its daily application to employees and stakeholders. While they must verify their employees' knowledge of their ethical and regulatory obligations, they must even more ensure that their practices comply with their obligations.

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In the event of recourse to sanctions related to non-compliance with ethical and/or regulatory obligations, this shall be carried out in accordance with local law and customs.

EKS applies its ethical principles to its relations with all market participants, including customers, investors, partners, suppliers, contractors (including intermediaries or consultants) or non-governmental organizations (NGOs). EKS promotes these principles to all its stakeholders. With respect to customers, EKS attaches the highest importance to customer satisfaction, which is based on the quality of products and services, open dialogue, transparency of procedures and compliance with commitments and competition rules.

EKS employees behave fairly and impartially in negotiations with all market participants. They ensure that partners, suppliers, service providers and subcontractors have compatible ethical concerns and bring the EKS Ethics Charter to their attention.

EKS requires that its contracts with partners, suppliers, service providers and subcontractors include a clause requiring compliance with EKS' human rights and anti-corruption commitments by them and by their own partners.

EKS ensures the integrity and reputation of its partners, suppliers, contractors and subcontractors.

In relation to society as a whole EKS applies its ethical principles wherever it operates. It conducts its business in accordance with internationally recognized human rights.

As a socially responsible company, EKS is committed to respecting the environment and the diversity of cultures in the communities in which it operates and to minimizing its ecological impact.

EKS communicates openly about its achievements and challenges in this field and cooperates with non-governmental organizations (NGOs) in the environmental and humanitarian sectors.

## **Governance**

The ethical commitment of EKS is promoted at the highest level of the company: the Managing Director and his colleagues ensure that the individual and collective values on which EKS bases its action are respected, that the rules of conduct to which each employee must adhere are observed, and that the means EKS uses to enforce them are adequate.

EKS promotes the integration of ethics into the vision, strategy, management and practices. It proposes ethical and compliance guidelines, supervises their implementation, conducts training, receives reports and participates in the necessary control activities.

## **The EKS ethics and compliance organization**

In each project, the General Manager breaks down and trains the people involved in the rules and duties relating to ethics and compliance, and ensures that they are respected. He ensures that the Ethics Charter and all reference documents relating to ethics are implemented. He contributes to the management of ethical risk by relying in particular on the management of his project and by reminding it of the primacy given by EKS to ethics and in particular to the fight against corruption and the respect of human rights.



The General Manager provides assistance and advice to any employee who questions him or her in matters of ethics and ensures that no sanction of any kind may be taken against an employee who has made disinterested and good faith use of an ethical incident reporting system.

### **Compliance monitoring**

In terms of ethics and compliance, the evaluation of the implementation of the systems is part of a continuous improvement process.

In this context, the CEO determines and promotes the necessary compliance controls. He ensures that ethical audits are conducted.

The General Manager also ensures that individual and structural measures are taken in case of ethical breaches.

For information or advice on ethics and compliance: [info@sder-consult.com](mailto:info@sder-consult.com)

To report an ethical incident: [info@sder-consult.com](mailto:info@sder-consult.com)

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