



The power of precision

ETHICS CHARTER

Ethic Standard Rules for Employees



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MESSAGE FROM OUR CEO

At ICAPE Group, delivering the best quality services and prices to our customers is our mission.

Trust is the most precious thing we offer to our customers, as well as to our employees, suppliers and subcontractors, shareholders, and society as a whole. That's why the ICAPE Group has set strong requirements in terms of ethical standards, transparency, and integrity.



These requirements and our values are the foundation of our corporate culture. They guide our daily decisions to always act ethically and strengthen the trust of our stakeholders. By promoting our values, we protect our company. This Ethical Charter is a key document for our Group. It brings us together, commits us, and encourages us to contribute with passion to ICAPE's mission.

As employees of the ICAPE Group, we are all ambassadors of trust. We thus commit to applying the principles and implementing the commitments presented in this Ethical Charter.

Yann DUIGOU
CEO ICAPE Group

WHY AN ETHICS CHARTER?

ICAPE Group and its employees commit to respect a minimum of standard rules in the field of ethics.

Most of our customers, living in developed countries are very concerned about compliance with these rules.

That is the reason why this document describes the main ethical issues that must be followed and respected by ICAPE Group employees.

This document is a guide of principles designed to conduct business honestly and with integrity. It outlines how employees should act on a day-to-day basis. It reflects the Company daily operations, core values and overall company culture. It lays out the rules for behaviour and provides the groundwork for a pre-emptive warning. That is why breaking this Code of ethics can result in termination or dismissal from the organization.

This Charter is based on clear-cut rules and well-defined consequences rather than individual monitoring of personal behaviour. Thus, we have to promote a climate of moral responsibility within the company.

A. Who the rules apply to?

This Charter applies to all employees of the ICAPE Group and its companies worldwide, including temporary workers. It is communicated to all new arrivals. We also expect our partners, especially our customers and suppliers, to familiarize themselves with this Charter, so that they share our values and commitments.

Our whole organisation and our employees must understand how it is important to follow all these rules. Employees will undergo formal training to learn the rules of conduct. Because noncompliance can create legal issues for the company as a whole, employees face penalties for failing to follow guidelines.

B. What happens in the event of non-compliance with the Ethic Chart?

Failure to comply with the rules and principles set out in this Charter may expose ICAPE Group employees to disciplinary sanctions, disciplinary action, up to and including dismissal for gross or misconduct.

In addition to these disciplinary proceedings, the violation of these rules and principles may also expose employees to civil and/or criminal and/or criminal proceedings.



OUR MISSION

ICAPE Group's mission is to make attention to detail a performance factor for our customers by guaranteeing the right technological solution, at the right price and with optimised quality, delivered as close as possible.

ICAPE Group offers the best services for an optimal quotation for Printed Circuit Boards or Technical Parts.

ICAPE Group stands for quality, trust and a true sustainable development. We put people, commitment and care at the core of our strategy.

OUR VALUES

Our values are the foundation of what makes ICAPE Group successful. The group is committed to: respecting the service procedures, creating a fair workplace environment for ICAPE Group employees, our factory partners and customers and ensuring uncompromising compliance with environmental and ethical rules. All our employees and partners embody these values.

Trust

At the ICAPE group, we build long-term relationships with our stakeholders. For our teams, we place great emphasis on autonomy, initiative and responsibility, based on a common assessment of performance. With our customers, this trust is the result of the satisfaction of the needs expressed by quality solutions. Lastly,

we strive to create and maintain partnerships with our suppliers.

Serving

At the ICAPE group, finding the best solution for our customers is our priority. This translates into a close relationship fostered by our presence in 22 countries. In addition, our in-depth knowledge of the entire value chain allows us to offer expert support to each customer. This is based on a rigorous selection process of our suppliers, whose quality is ensured by regular audits.

Agility

In a dynamic and competitive sector, we owe it to ourselves to be reactive to our customers. This flexibility allows us to grow and to distinguish ourselves efficiently in our market. We believe in the power of continuous improvement approaches. Internally, our teams are proactive and agile, in order to adapt to the market's challenges. As a proof of this agility, the year 2022 has been marked by five new acquisitions, in addition to our IPO, completed in only nine months. A remarkable performance that places the ICAPE Group as a leader in the printed circuit board industry.



Multiculturalism

We are a cosmopolitan group. Of French origin, with a strong presence in China, the ICAPE Group has built its success on its openness to the world. We are now present in 22 countries on

four continents, with customers located in 70 different countries. With 39 nationalities in our workforce and as we develop internationally, the ICAPE Group encourages everyone to cultivate the cultural knowledge of others in an open-minded attitude and an approach of inclusivity.

Solidarity

The employees of the ICAPE Group are united by a sense of community of interest that promotes mutual aid. Team spirit has been at the heart of all the ICAPE Group's developments since its creation in 1999, and even today, as companies have multiplied throughout the world. From customer to supplier, we defend fair relationships across the entire value chain. The mobilisation of all of the Group's stakeholders during the various lockdown periods around the world is an emblematic example.

Sustainable ambition

Identify our suppliers, improve manufacturing processes, choose innovative materials, obtain certifications, determine the location of production sites, control the supply chain, reduce the footprint of the Group's sites, etc. In addition to compliance with regulations, the ICAPE group conducts its operations in line with an ambition of sustainability, as part of a continuous environmental improvement approach.

ICAPE GROUP'S MAIN PRINCIPLES AND RULES

I. GENERAL PRINCIPLE: COMPLIANCE WITH LOCAL LAWS AND PRACTICES

The ICAPE Group is present in over 20 countries. Our 650 employees comply with all applicable laws and regulations wherever they operate.

The ICAPE Group attaches particular importance to compliance with quality, labour law, health and safety, anti-corruption, anti-influence and anti-fraud, data protection, transparency, intellectual property, competition and export controls.

We ensure that our economic and commercial partners comply with these same laws and regulations.

Where local legislation imposes stricter standards than those set out in this Charter, local legislation must always prevail. On the other hand, if the Charter provides for more rules, they prevail, unless they result in illegal activity.

The ICAPE Group implemented the ICAPE Integrity Line, a reporting system accessible to all group employees via the link <https://www.icape-group.com/sustainability/ethics-and-compliance/> to

a situation or behaviour in breach with the group's values, and in particular the principles detailed below.

II. CORRUPTION FIGHT COMMITMENT

A. Conflicts of interest

Our personal interests must not interfere with the interests of the ICAPE Group. We declare any relationship that could give the impression of a conflict of interest. The employees of the ICAPE Group must not engage in professional activities outside the Group, except with the written authorization from their line manager and their local HR contact.

B. Gifts and hospitalities

Exchanging gifts or invitations can help to maintain good business relations with our customers, suppliers, and subcontractors. However, some gifts are not appropriate for a business relationship and are strictly forbidden and are strictly prohibited (gifts of cash, gifts of a dubious or sexual nature, etc.). Generally, the value of gifts and hospitalities should remain symbolic, and transparency must be the rule. They must never be intended to influence, or give the impression of influencing a business decision.

Certain subsidiaries or business partners may apply stricter rules regarding gifts and hospitalities. We always apply the most restrictive rule where applicable.

C. Insider trading

ICAPE Holding SA, the ICAPE Group's holding company, is listed on regulated market.

All ICAPE employees with knowledge of privileged information shall act to prevent any illegal practice of trading securities based on material nonpublic information about the company.

D. Donations, sponsorship and political contributions

The ICAPE Group has established rules to govern its practices its sponsorship and institutional relations practices to avoid exposing relations to prevent them from exposing it to corruption.

E. The fight against money laundering

We take great care to ensure that our activities are not used to launder funds through dedicated preventive measures, such as the systematic verifying the identity of our business partners.

F. The ICAPE Group's Anti-Corruption Code of Conduct

This Code of Conduct aims to define corruption, identify high-risk situations and specify the behaviour to adopt when faced with such situations. It calls for in all our dealings with public officials, in France and abroad public officials, both in France and abroad (public officials of public authority, structures or individuals carrying out a public service, elected representatives, judicial personnel, companies or companies controlled by the State, etc.).

G. Confidentiality (Intellectual Property protection)

It is critical that employees maintain confidentiality of customer information and corporate information. No corporate or customer documentation may leave the ICAPE Group premises without approval of the management team.

Indeed, our employees are committed to strict confidentiality of all information and data of our customers, no matter how they came to learn such information during their work for ICAPE Group or their cooperation with customers.

Employees accept to follow all restrictive rules concerning non-disclosure agreements signed by ICAPE Group with its customers. They accept not to disclose any information to any third party without the agreement of ICAPE Group and its customers. They will protect all the information of ICAPE Group and its customers, using them only in an appropriate way when doing their job.

Violation of this Charter may subject an individual to disciplinary action up to and including immediate termination. Violation of the requirements of non-disclosure agreements may also result in criminal prosecution.

H. Fairness, honesty and respectful attitude

Our employees understand that only fairness, honesty and respectful attitude in our relationship with our partners will enable us all to succeed.

That is why they commit to follow such a Code of conduct in order to deal properly with our customers, suppliers and other partners. They understand that this is the only way to build long term and fair partnerships in the business world.

It is understood that all individuals while employed by ICAPE Group are expected to help maintain a positive work atmosphere by behaving and communicating in a manner so that they get along with customers, clients, co-workers and all members of management.

The good housekeeping apparent to the many guests touring the facilities also contributes to the reputation of ICAPE Group. Each individual has a responsibility in this important area.

Food and/or drink should also be kept in designated areas only and consumed in the spaces provided for this purpose.

This Charter includes a statement about refusing to contract with suppliers that do not respect the following conditions:

- ❖ **Loyalty:** Act in the best interest of our company. We are faithful to the company we represent, while honouring our obligation to serve our customers' interest.
- ❖ **Fairness:** Deal fairly with clients, employees, employers, suppliers, competitors. We respect all opinions and support the right of free expression.
- ❖ **Act Independently:** Avoid conflicts of interest, real or perceived. Disclose unavoidable conflicts.

Soliciting

Soliciting by individuals during actual working time is not permitted. Conducting any business other than ICAPE Group business during working time or on ICAPE Group property is not permitted.

Sale of items or services of any kind for profit (professional services, products, etc.) is prohibited during work hours. Placing notification of such items for sale on ICAPE Group bulletin boards, flyers posted on doors, walls, or notices via e-mail are not permitted.

ICAPE Group will assume no responsibility for the theft or loss of merchandise or money.



Soliciting of any type by individuals who are not employed at ICAPE Group is not permitted at any time.

Gift Collections

Whether or not employees contribute to any department gift collection or exchange is entirely up to them.

ICAPE Group takes no responsibility for gift collection or exchanges. All such collections should have the approval of the department manager.

Environment and nature respect

Employees agree to respect our country environmental regulations in order to protect the nature and people living around.

Employees also agree to protect their workplace to respect colleagues and visitors.

We encourage our employees to reduce waste (food, paper, etc.) and recycle what can be recycled.



III. RESPECT FOR HUMAN RIGHTS

ICAPE Group is committed to respecting human rights and does not participate in human trafficking or use forced, involuntary or slave labour, either directly within its workforce or indirectly via our suppliers or customers.

Our suppliers must not buy materials or services from companies that use forced, involuntary or slave labour.

ICAPE Group pays attention to respect guidelines of UNICEF Organisation concerning the age of young people under below they are not allowed to work.

Moreover, the Company does not employ children who have not reached the minimum school-leaving age in the country where it operates unless they are participating in official apprenticeship programs.

ICAPE Group ensures that its suppliers and customers also comply with these guidelines too.

A. Labour laws respect

Employees should respect our country labour laws and regulations.

Each employee must sign a written labour contract and a non-compete agreement with our Company.

Employees must respect their contract and the internal rules of the Company, as well as labour law.

B. Discrimination/Equal Opportunity Employment

ICAPE Group applies an equitable human resources policy which complies with applicable laws and is respectful of people's rights and individual and collective freedoms.

The Group prohibits all discrimination based on illegal grounds such as gender, age, ways of life, actual or supposed membership of a specific ethnic group or nation, health status, disability, religion, political opinions or trade union activities.

All pressure, prosecution or persecution of a moral, sexual, or other unlawful nature is prohibited.

All conditions of employment must be based on the individual's ability to do the job and not on other personal characteristics or beliefs. ICAPE Group will not accept any employee that discriminates on the basis of age, race, colour, religion, sex, origin, or disability.

ICAPE Group is an equal opportunity employer under all other applicable laws, executive orders, and regulations.

It is the policy of ICAPE Group to afford equal opportunity for employment to all individuals. This policy applies to all phases of recruitment, selection, hiring, placement, transfer, promotion, training, compensation, benefits, and all other decisions affecting any applicant or employee.

ICAPE Group is committed to the goal that every individual should have equal employment and career opportunity based upon the individual's abilities and qualifications, interests, and desire to excel.

ICAPE Group seeks to encourage all individuals to express freely, responsibly and in an orderly manner their concerns about all instances of discrimination of any kind. It is extremely important to note that any concerns, complaints or reports of discrimination will be reviewed seriously and treated with as much confidentiality as the circumstances will allow. ICAPE Group will promptly investigate and review all complaints and take appropriate action based on the results of the investigation. In addition, an individual will not be retaliated against because of any report filed.

ICAPE Group will not tolerate any form of discrimination at any level. If anyone has been discriminated against, employee should voice a complaint to any manager, or person with whom he/she would feel most comfortable discussing the situation. Any individual found in violation of this policy will be subject to discipline that can include immediate termination.

It is the responsibility of each individual to treat one's fellow workers with fairness, dignity, and respect.

C. Health and safety

The ICAPE Group is committed to ensuring that its employees do not work in dangerous conditions, particularly underground, underwater, at dangerous heights or in confined spaces, its employees or those of companies with which the company drives business.

Smoking Policy

ICAPE Group's goal is to provide a work environment that is as free from health hazards as possible. The hazard of both smoking and passive smoke must be eliminated from the workplace entirely. Smoking or tobacco use is prohibited in all ICAPE Group offices, restrooms, breakrooms and conference rooms.

Alcohol and Drug Abuse Prevention

ICAPE Group is committed to a drug-free and alcohol-free workplace. Employees are not to engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance or be under the influence of or impaired by a controlled substance or alcohol while conducting ICAPE Group business, on duty or on ICAPE Group's property. Violation of this policy is grounds for immediate discipline, up to and including termination of employment.

ICAPE Group has the right, responsibility and obligation to provide a safe drug-free work environment for all employees, and to provide a quality product and services to its customers. ICAPE Group retains the right to deny or terminate employment if it determines that a legally prescribed drug will adversely affect job performance, endanger the health of that individual or any other person, and/or if another non-safety sensitive job is not available. Individuals whose performance either contributed to an accident or an injury, or they cannot be completely discounted as a contributing factor to the accident or injury, will be tested for drugs if there is a reasonable suspicion to suspect the employee's behaviour. ICAPE Group reserves the right to call the Police to inspect or test with reasonable suspicion the property and person of any individual or vehicle on ICAPE Group property.

Any violation of this policy, including refusal to submit to a drug or alcohol test required in accordance with ICAPE Group's procedures, may constitute cause for immediate termination.

Violence Prevention

Any violent act or threat of violent acts made by an individual against another person's life, health, well-being, family or property, are entirely unacceptable and cause for immediate termination.

This policy holds for any threats made on ICAPE Group property, at ICAPE Group events or under other circumstances that may negatively affect ICAPE Group's ability to conduct business. Such acts or threats of violence, whether made directly or indirectly, by words, gestures or symbols, infringe upon ICAPE Group's right and obligation to provide a safe workplace for its employees. The disciplinary policy will be enacted in cases of violence.

Any individual who believes that he or she has been the target of violence or threats of violence or has witnessed or otherwise learned of violent conduct by another person in the capacity described should contact his or her immediate manager or manager immediately.

D. Security respect

Among ICAPE Group's activities, the manufacturing of PCB and technical parts require, for your safety, a strict respect of the following guidelines.

By adhering to these, employees help create a safer workplace for everyone. Let's work together to ensure a secure and healthy environment.

ICAPE Group provides adequate processes, machines, storages and procedures to ensure its employees a safe and healthy environment for working.

Employees agree to make every effort to respect the work environment and work procedures to achieve this safety goal, especially to employees working in the plants and warehouses.

For everyone's safety, ICAPE Group supplies lab coats, masks, gloves, helmets with safety eyewear, etc. in some areas. If issued, these safety devices must be worn.

It is imperative that all individuals follow the established safety procedures in their department. Refusal or neglect to do so may result in disciplinary action.

Indeed, in the end, it is individual action that results in a safe or unsafe practice.

Use of Machines and Equipment

Even if they are not numerous, machines, tools, and equipment throughout some areas should not be operated without proper training or instruction.

To promote and protect one's safety and the safety of others, operating or using such equipment without the proper certification, training, instruction and approval will subject to the disciplinary system.

Fire and Other Emergencies

Everyone should become familiar with the locations of all fire extinguishers and first aid stations posted for each floor and with all the exits from the areas where employees work. Exits are marked with "EXIT" signs, and other doors are marked with signs denoting the area to which they lead.

If a fire should be discovered, people must:

- ❖ **Alert others in the area**
- ❖ **Notify a manager**
- ❖ **If necessary, use the emergency equipment**
- ❖ **Go to a safe location**



Do not panic. Often more injuries are caused by panic than by the fire or the emergency itself.

The company has all the necessary fire-fighting equipment in its field of activity to protect its workers and the employees undertake to follow the mandatory training in this respect.

By following safety rules and instructions, each employee will help continue to make ICAPE Group a safe place to work.

E. Harassment Prevention

Harassment is defined as:

- ❖ Unwelcome sexual advances,
- ❖ requests for sexual favors and/or other verbal or physical conduct of a sexual nature, when submission to such conduct is made an implicit or explicit condition of an individual's employment; or submission to or rejection of such conduct affects employment opportunities; or Conduct that interferes with an employee's work or creates an intimidating, hostile, offensive, or uncomfortable work environment.

ICAPE Group prohibits the display of harassment, including harassment based on race, color, religion, sex, origin, pregnancy, age, handicap, disability, by any individual employed with ICAPE Group. ICAPE Group will not tolerate any form of harassment at any level. Any individual found in violation of this policy will be subject to disciplinary policy that can include immediate termination.

ICAPE Group seeks to encourage all individuals to express freely, responsibly and in an orderly manner, their concerns about all instances of harassment of any kind. Complaints or reports of harassment will be reviewed seriously. ICAPE Group will promptly investigate and review all complaints and take appropriate action based on the results of the investigation.

Accusations of harassment are of utmost seriousness and should never be made casually and without cause. ICAPE Group prohibits individuals from making frivolous, false, or malicious charges. Individuals found making such false charges will be subject to discipline that can include immediate termination.

It is the responsibility of every employee to bring to ICAPE Group's attention instances of discrimination, including sexual harassment. Everyone must treat their fellow workers with fairness, dignity, and respect.

F. Dress Code

Appearance and dress should be appropriate and in good taste. A dress code helps promote safety and professionalism. A professional looking work force is apparent to many of our guests touring the facilities and contributes to the reputation of ICAPE Group. Furthermore, a dress code is necessary to promote safety procedures and to comply with various regulations. All casual dress must be in good taste and appropriate for an office environment. The dress code is applicable to all individuals,

including full time, part time and temporary workers, whether employed by ICAPE Group or an outside agency.

Some functions may require the wearing of a lab coat while on the control area to provide anti-static protection for boards and electronic components. Lab coats are not to be worn outside of the ICAPE Group workplace. It is each individual's responsibility to clean and launder lab coats as needed.

Those who do not follow the dress code will be sent home without pay to change clothes and may be subject to the disciplinary action policy.



MEANS AND PROCEDURES

I. PERSONAL DATA PROTECTION

The confidentiality and protection of personal data are a constant concern for the ICAPE Group. It is also a guarantee of trust for our customers, suppliers, partners, employees and all our stakeholders.

We are committed to respecting the privacy of individuals in accordance with applicable legislation. The personal data that we may collect and process in the course of our activities:

- ❖ must be used for a specific and legitimate purpose and in a fair manner;
- ❖ must not be kept longer than necessary for that purpose.

II. ICAPE INTEGRITY LINE

The ICAPE Integrity Line is the whistleblowing system which allows any employee or external partner to report misconducts that they may be aware of.

The purpose of this procedure is to clarify the context and the way in which an ICAPE employee or an external partner of the group can proceed to make a report, and how the reports are handled. A report consists of

- ❖ revealing/reporting, without seeking direct financial consideration and in good faith, information on a conduct or situations in contradiction with ICAPE's Ethics Policy and ICAPE's anti-corruption code of conduct
- ❖ A crime or an offence A violation of the law or a regulation
- ❖ A situation that may threaten or harm the public interest Intentional concealment of such acts or acts of retaliation related to making a report or participating in its processing Reporting may therefore cover the following areas: Corruption:
 - ❖ An act of corruption is the giving, offering, or receiving of an undue advantage, with the intention of influencing someone's behavior to obtain favorable treatment, to obtain a favorable decision or to influence the outcome of a negotiation.
 - ❖ Conflict of Interest: A situation where the personal interests of a Group employee conflict, or may conflict, with those of the Group. (e.g. an employee's privileged relationship with a supplier for family or financial reasons, etc.)
 - ❖ Human Resources: This category includes harassment, intimidation, discrimination, violence in the workplace, respect for human rights, etc.
 - ❖ Environment and Health and Safety:
 - ❖ Violation of laws, legislation, environmental protection, and human health/safety policies.
 - ❖ Fraud: Use of unfair means to obtain consent, undue material or moral advantage or an advantage achieved with the intention of evading rules (laws, internal rules, etc.) for oneself, for the company or for a third party. (embezzlement of funds, confidential information disclosure, falsification of accounting records to conceal an illegality, etc.)

The whistleblower is protected in accordance with the applicable regulations. ICAPE Group undertakes to treat the identity of the report's author, the persons concerned and the facts with the utmost confidentiality.

To make a report : <https://www.icafe-group.com/sustainability/ethics-and-compliance/>

III. INFORMATION SYSTEMS/ TECHNOLOGY/VOICE MAIL/ELECTRONIC MAIL USE

The primary purpose of ICAPE Group's information systems is as a tool for business communications.

Unauthorized use of computer equipment can threaten the ability of the system to operate properly and potentially subject the user and ICAPE Group to certain liabilities. Employees may not use ICAPE Group's equipment to send or receive messages in violation of country laws, in violation of ICAPE Group's policy, in violation of the property or copyright interests of another, or in any inappropriate, discriminatory, or unauthorized manner. Employees should keep in mind that ICAPE Group owns the devices and the information in these devices. ICAPE Group will require the employee, when leaving the company or for any reason, to return the equipment. Use of ICAPE Group -provided resources in violation of this policy may result in disciplinary action, up to and including termination.

Management's right to access information

ICAPE Group reserves the right to access, search, inspect, and disclose any message, communication, or file on a voice mail or computer system owned or operated by ICAPE Group at any time or for any reason. ICAPE Group also retains the right to access, search, inspect, and disclose any file contained on any diskette located on ICAPE Group property or kept with files or equipment that belong to, or are provided by ICAPE Group at any time for any reason. All equipment, software, files, disks, diskettes, communications, or messages created, maintained, or sent or received on any system or storage device provided by ICAPE Group are considered ICAPE Group property. ICAPE Group owns any communication sent via email or that is stored on ICAPE Group equipment. Management and other authorized staff have the right to access any material in email or on computer at any time. Electronic communication, storage or access should not be considered to be private if it is created or stored on work systems.

Internet Usage

Internet use, on ICAPE Group time, using ICAPE Group-owned devices that are connected to ICAPE Group network, is authorized to conduct business only. Internet use brings the possibility of breaches of the security of confidential information. Internet use also creates the possibility of contamination to our system via viruses or spywares. To assure the use of work time appropriately for work, employees are asked to limit internet use to business purposes and reasons only.

Additionally, under no circumstances may ICAPE Group owned computers or other electronic equipment, including devices owned by the employee, be used on time at work to obtain, view, or reach any pornographic, or otherwise immoral, unethical, or non-business-related internet sites. Doing so can lead to disciplinary action up to and including termination of employment.

Social Media

Employees are encouraged to limit the use of social media to work-related content and outreach during work hours. Additionally, they are prohibited from sharing any confidential or protected information that belongs to or is about ICAPE Group. Employees are strongly encouraged not to share disparaging information that places ICAPE or colleagues in an unfavourable light.

ICAPE Group's reputation and brand should be protected by all employees. The lives and actions of co-workers should never be shared online. In social media participation from work devices or during working hours, social media content that discriminates against any protected classification including age, race, colour, religion, sex, origin, or disability is prohibited. Any employee, who participates in social media, who violates this policy will be dealt with according to ICAPE Group's harassment policy (see below).

Email Usage

Email is also to be used for ICAPE Group business only. ICAPE Group's confidential information must not be shared outside of ICAPE Group, without authorization, at any time. Employees are also not to conduct personal business using ICAPE Group's computer or email. Non-business-related emails waste ICAPE Group time and attention. Viewing pornography, or sending pornographic jokes or stories via email, is considered sexual harassment and will be addressed according to our sexual harassment policy.

Emails / Texts / Social Media That Discriminate

Any content that discriminates against any protected classification is prohibited. Any employee who sends content that violates this policy will be dealt with according to the harassment policy. Sending or forwarding non-business content will result in disciplinary action that may lead to employment termination. Chain letters, obscenity, pornography, political and religious solicitations, non-business-related streaming audio or video, items of a discriminatory or harassing nature or personal use for profit are strictly barred.

Installation/Modification of Software

To ensure system compatibility and the security of data files maintained on the machine, no one may install or modify software on any computer provided by ICAPE Group unless express approval is provided by the Department Manager and IT Department. All installable software/media must be pre-approved by ICAPE Group's IT staff and must have any and all license agreements in their original form for safekeeping by IT Department.

ICAPE Group Issued Property

Upon employment at ICAPE Group, employees may be issued computers, password and user names, access fobs, keys, an employee handbook and in some cases, lab coats and/or other corporate items such as equipment, tools, etc. These items are and will remain the property of ICAPE Group.

In the event that any of these items are lost, stolen, or destroyed by gross neglect, the item will be replaced. However, a replacement fee will be charged and deducted from the paycheck.

An individual whose employment is terminated or voluntarily resigns must return all ICAPE Group property, including the above. If these items are lost or not returned, a replacement fee will be charged against and due at the time of termination.

Personal Telephone Calls and Cell Phones

Except in case of emergency, personal cell phones should have their ringers turned off/vibrate during working hours. Employees will be allowed to return missed calls during scheduled break times.

Exception is made for managers, and other employees who are provided with an ICAPE Group cell phone or who routinely use their personal cell phones for business use (with management approval). For these individuals, use of these devices for personal business during working hours should be kept to a minimum and is subject to review by management.

IV. LIMITS ON AUTHORITY

Persons covered by this Code should be aware of the limitations on their authority to act on behalf of ICAPE Group and should not take any action that exceeds those limits. They must not sign any document on behalf of ICAPE Group, or in any other way represent or exercise authority on behalf of ICAPE Group, unless specifically authorized to do so.

V. BREACH OF ETHICS CHARTER AND RELATED DISCLOSURES

ICAPE Group deals with allegations of breaches fairly and appropriately. In case of a possible breach of this Charter, employees are asked to inform their Manager for the area in which they work, or to Human Resources Department. A breach in conduct will result in taking action relevant to the staff and affiliates' involvement with the Company. Any personal threats, emergencies and serious incidences where the law has been broken should be reported to the Police. This Charter does not stop staff and affiliates taking an action external to the Company's processes. A failure to comply with this Charter will be viewed seriously and may lead to disciplinary action, including possible termination of employment. An allegation of a breach of this Charter which is made vexatiously, maliciously, frivolously, mischievously, and/or without reasonable cause may constitute misconduct and a breach of this Charter. Unlawful conduct may result in criminal proceedings, in accordance with the relevant legislation and related processes.



By accepting this Ethics Charter, all employees accept to do their best and to make progress with ICAPE Group in order to comply as well as possible with all those requirements. They also accept to promote all those ethic standard rules with their own team, customers, suppliers and sub-contractors.

If an employee does not undertake to comply with these rules, then ICAPE Group may have to decide to terminate his relationship with the employee concerned.

We hope that every employee understands how important it is today to show customers that we are a serious and honourable company that respects the standards of ethics, labour, environment, safety and security standards as well as human rights.

By doing so, ICAPE Group will:

- ❖ Protect everyone's reputation but also the reputation of our customers.
- ❖ Comply with the wishes of most developing countries worldwide.
- ❖ Make the difference with irresponsible companies which respect only money no matter what the cost to the human community.

This Ethic Charter is not an expensive policy, but a winning strategy that will bring us success all around the world. We sincerely hope that each of our employees will understand it.

