

REEL International's Code of Ethics

In order to clarify for our partners, customers and suppliers the driving forces that lead us, the present document clarifies who we are, the values that form our corporate culture and lead us as well as our resulting ethical daily commitment. This heritage comes to us from the past and the firm's history and is very heavily anchored in the Group's practices. An « ethics and deontology » permanent committee was created in 2016. This committee is responsible for the evolution and interpretation of this Code of Ethics.

WHO WE ARE:

- An independent family owned company with identified shareholders.
- A company that sells dedicated solutions for equipment or services targeting highly technical installations, automated or not, located at the core of our clients' processes.
- An international team due to its geographical set-up and to its clients and which, as a result deals with and profits from its diversity and different backgrounds.
- A multi-skill company (design, manufacture, installation, maintenance, and dismantling) and multi-sector company (energy, aeronautics, aluminium, offshore...), but which possesses high levels of technical coherence and know-how in its approach to development.



THE VALUES THAT BUILD UP OUR CHARACTER AND FORM OUR FOUNDATION STONES:

- The high and ongoing concern with Health/Safety at work.
- Looking for Performance on both economic and technical levels as well as
 a permanent effort to provide Client Satisfaction. Over the years, through
 quality, attention to clients' needs, service, reactivity, technical innovation,
 a pragmatic approach and flexibility, the REEL teams have been building up
 and consolidating the company's success on the basis of client satisfaction
 and its clients' resulting loyalty. The two contribute to a good sustainability
 and maintain the company's economic and strategic independence.
- Respect for others, whether they are employees, customers, partners, suppliers or competitors is one of the company's firmest values.
 Respect for Group employees includes their job satisfaction and their career paths.
 Respect for the environment is also incorporated in this global approach.
- The Commitment of the men and women that make up REEL, on a day-to-day level. Through their involvement, the responsibility they show, and the honesty and loyalty that guide them, a real climate of trust has been created and maintained both internally and externally in respect of partners and clients.
- Lastly, **the Passion** that motivates the large majority of Group employees is also a strong mobilizing element and, therefore, a shared value. Passion for technical aspects, for work well done associated with the ensuing pride, and for the pleasure of working in a good atmosphere and in a company where human values are at the forefront.

All of these values contribute to what some people call "the REEL Spirit" which also plays a significant role in the quality of work in the company and the reputation of its teams. As years go by, team spirit, solidarity, a spirit of sharing and the intercultural exchanges connected with REEL employees' professionalism have built up this "REEL spirit", easier to recognize than to define.



OUR ETHICAL DAILY COMMITMENT:

> REEL International undertakes to:

1. Ensure Health and Safety

Ensure the safety and protect the health of employees at work as well as the safety of the installations and equipment that the Group develops, manufactures, installs and maintains for its clients.

2. Develop competences and talents

Develop the competences of its employees, implement them in the company's' best interests, recognize their contribution; review the quality of their life at work and their professional fulfilment. Maintain a constructive dialogue with them and their representatives.

3. Respect laws and regulations

Respect the laws and regulations of countries in which the Group operates and in which its teams intervene.

4. Prevent and deal with injustice, discrimination and violence

Prevent and deal with any situation of injustice or discrimination in the workplace as well as any situation of violence or harassment.

5. Respect and protect the environment

Respect and protect the environment by managing risks and reducing the impact of its activity on individuals and nature.

6. Exercise loyalty, honesty and integrity

Exercise and promote loyalty, honesty and integrity in labour relations. Fighting against fraud, corruption, traffic of influence and all forms of practices likely to harm others and/or to create disorder made up by the differences observed compared with the Group's values and ethical commitment. In this context, conduct the appropriate procedures, proportionate to our risks analysis, concerning our clients, our suppliers and our providers to ensure the sharing of these same values.

7. Protect and prevent disclosure of data and information

Protect and prevent disclosure of data or information concerning employee's private life or labour relations as well as technical, economic, social or financial data belonging to the company or its clients or partners.

8. Organize an internal whistleblowing system and a clear disciplinary system concerning deviation from rules adopted in the ethical Code of conduct.

The Executive Committee and the Managers of the REEL Group undertake to promote, respect and ensure respect by all employees of the Group's ethical commitments presented above.



OUR VALUES AND OUR ETHICAL COMMITMENTS ARE BASED ON FUNDAMENTAL TEXTS:

- The Universal Declaration of Human Rights.
- The Declaration of the International Labour Organization guaranteeing the fundamental principles and rights at work. 1998.
- The Rio declarations of 1992 and of Rio + 20 of 2012 on the environment.
- Organization for Economic Cooperation and Development guidelines for multinational enterprises.
- The United Nations Convention against Corruption.
- The United Nations Guiding Principles on Business and Human Rights.
- The International Labour Organization fundamental conventions.
- The Convention on Combating Bribery of Foreign Public Officials in International Business.