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Code of Ethics

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ATALIAN
GLOBAL SERVICES

Letter from the Chairman



ATALIAN is a leader of global services to companies and local authorities. The Group boasts more than 25 000 clients both in the private and public sectors. Its offer revolves around a number of key services lines: Cleaning, Security, Technical Maintenance and Facility Management, Front of house, Landscaping, Finishing Works and Energy Management.

Integrity is the fundamental value that underpins ATALIAN's decision-making, professional practices and business relationships. Consequently, I attach the utmost importance to the moral qualities of our employees. By joining us, they commit themselves to acting with honesty, integrity and to respecting the Group's core values and applicable rule of law and maintaining an atmosphere of trust.

This trust essentially emanates from transparency. Indeed, in their internal dealings with one another, employees are encouraged to foster dialogue, the objective of which is the efficient, clear, objective and timely flow of information.

Our company's added value is based on our culture of service provision and our daily contribution to improving the quality of life and the well-being of our clients, with whom we are committed to establishing lasting relationships. To achieve this, we expect irreproachable behavior from our employees; professionalism and performance underlie ATALIAN's success in a market that is increasingly competitive. Our primary concern is always the satisfaction of our clients, which relies on continuous innovation and the quality of the services provided by our teams and the products that we use.

To achieve such a goal, solidarity, loyalty, dialogue, a keen sense of responsibility and teamwork remain our watchwords. To promote the professional development of our staff, I commit myself daily to respect their fundamental rights and to ensure they have the best possible working conditions within the context of the Group.

In this way, the well-being of our employees will undoubtedly reflect positively on the services we provide our clients, whose satisfaction is our ultimate goal, while maintaining our financial stability.

Moreover, since 2010, ATALIAN has embarked on a responsible approach towards sustainable development by integrating into its operations the principles and structures of the Corporate Social Responsibility ISO 26000 standard.

This provides a method for deploying Sustainable Development strategies.

Specifically, we are trying to balance economic growth on a daily basis with social progress and environmental protection. As reflected in the will of the Group's top management to draft ATALIAN's Sustainable Development report, which is inspired by the principles of the UN Global Compact, the Universal Declaration of Human Rights and the ILO Conventions.

We have also been evaluated on our level of Corporate Social Responsibility (CSR) by ECOVADIS and SEDEX which are (CSR evaluation platforms that are accessible by our clients). To take this even further, we carried out our own CSR diagnosis across the entire Group. Now, the goal is to place this self-assessment into a CSR evaluation grid that can be put into action at the different Branch, Regional, Agency, and Client Site levels that are specific to the businesses and activities of each of the Group's divisions.

The results of this evaluation will then be communicated to our clients, thus upholding our commitment to CSR transparency.

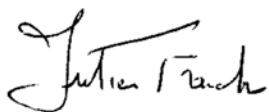
ATALIAN aims to give the companies and employees of its various national and international business lines, a common, coherent set of practices to which they can refer to, in order to guide them in the exercise of their worldwide missions.

Added to this is the desire to run our business responsibly and respect our partners. We are convinced of the importance ethics must take in our relationships with our suppliers, subcontractors and clients, as well as with the local community.

Introducing an ethical approach within the Group goes well beyond our initial commitment to comply with laws and regulations. Indeed, by taking such an approach beyond the strict confines of legalities and standards, we have taken on a long-term vision within a competitive market.

This Code is a necessary support for our development strategy and an important vehicle for our continuous quest for performance.

I'm counting on all ATALIAN employees to incorporate the basic principles set down in this Code into their daily decision-making and activities.



Franck JULIEN
CEO

Table of contents

Introduction.....	4
The ATALIAN spirit.....	6
A. Attitude to be adopted outside the Group	7
1. Lasting relationships with customers, suppliers and subcontractors.....	7
1.1. General principles of transparency and fairness.....	7
1.2 Customer Loyalty and compliance with competition laws and regulations.....	8
1.3 Fairness towards suppliers and subcontractors.....	9
2. Societal and environmental responsibility	9
2.1 Towards communities/local authorities.....	9
2.2 Towards the environment.....	9
B. Principles of the Group	10
1. Ethics within our human resources	10
1.1 Respect for persons and human rights.....	10
1.2 Health and safety at work.....	11
1.3 Recognising employment.....	12
2. Protection of ATALIAN property and resources.....	12
2.1 Proper use of property and equipment.....	12
2.2 Intellectual Property and Confidentiality	13
Glossary	15
Reference documents.....	18

Introduction

Fundamental principles and values of the Group

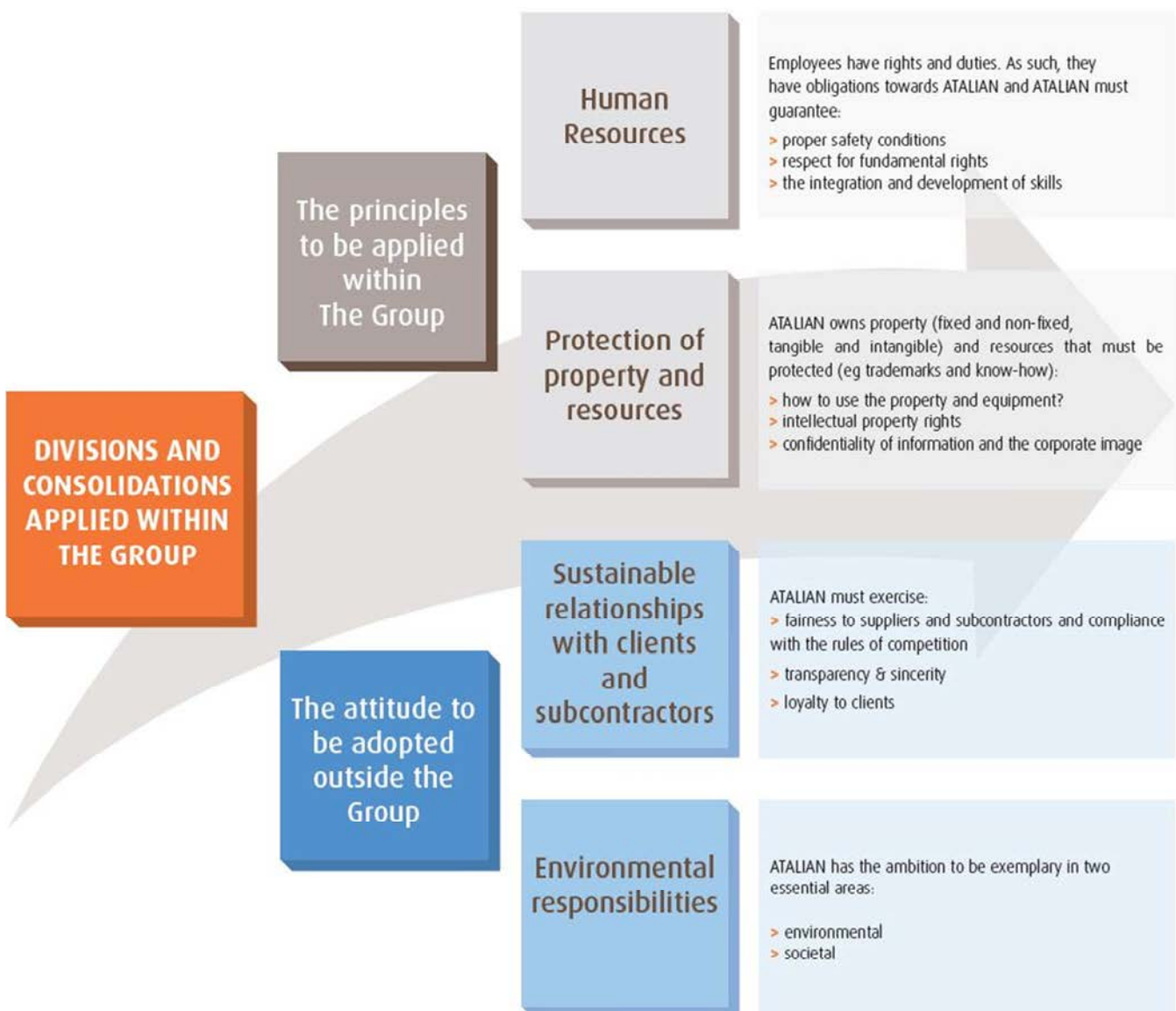
- ◆ **ENTREPRENEURIAL SPIRIT**
- ◆ **INTEGRITY**
- ◆ **SUSTAINABLE RESPONSIBILITY**
- ◆ **VERSATILITY**
- ◆ **SIMPLICITY**

The core values of ATALIAN are structured within this Code of Ethics.

This Code applies to all employees and Group entities. It is also available in several languages on the Group's website.

This Code may be subject to changes or updates in the future. Different versions of the Code may also arise to broach a variety of different subjects and or business lines.

This Code applies to all business lines in France and abroad. It is addressed to all employees, suppliers, subcontractors and clients that are likely to operate within the realm of ATALIAN Group.



The ATALIAN spirit

The ATALIAN spirit is built upon the fundamental principles that govern the behavior of each and every person on a daily basis such as:

- ◆ Transparency
- ◆ Fairness
- ◆ Compliance with laws and regulations
- ◆ Compliance with the rules of competition
- ◆ Loyalty
- ◆ Integrity
- ◆ Environmental respect
- ◆ Confidence



A. Attitude to be adopted outside the Group

TRANSPARENCY ♦ SINCERITY ♦ LOYALTY ♦ EXEMPLARITY

Outside the Group, employees must conduct their transactions ethically. A responsible approach provides positive results, while encouraging exemplarity and taking responsibility within the Group's activity.

1. Lasting relationships with customers, suppliers and subcontractors

1.1. General principles of transparency and fairness

Reject any form of corruption whatsoever

ATALIAN fights corruption in all its business relations with its partners and combats:

- ◆ Extortion
- ◆ Facilitation payments
- ◆ Undue benefits both given and received
- ◆ Any payment or acceptance of improper payments while carrying out Group operations.

Ensure the reliability of financial information

ATALIAN is committed to convey in the most truthful and clear manner, its financial transactions in the appropriate accounting books. These in turn are

made available to the various decision-making bodies, auditors and personnel representatives.



Compliance officer

We recommend that you inform the compliance officer as soon as possible, if you suspect that a situation is or could be an act of corruption. Detecting and reporting acts of corruption is the responsibility of all Group employees.

Conflicts of Interest

ATALIAN employees must avoid any situation that might create a conflict between their personal interests, those of their family members and those of the Group.

ATALIAN employees must not hold any interests, investment or otherwise in the business of a supplier, client, competitor or consultant, if such interests or investments are likely to affect trade relations made on behalf of ATALIAN.

1.2 Customer Loyalty and compliance with competition laws and regulations

In a perpetual concern for quality and the client's best interests, ATALIAN agrees to comply with the applicable rules of competition, i.e. any procedure that hampers competition such as cartels or the abuse of a dominant position.

Reminder of applicable competition rules

- ◆ Decide independently and autonomously on prices, production, clients or markets
- ◆ Do not come to an agreement with a competitor, directly or indirectly, even informally, on prices, production, clients or markets
- ◆ Do not exchange information with competitors regarding providers, customers or co-contractors with whom the company works or intends to work with; or markets in which the company intends to do business; or commercial conditions it wishes to abide by or to enter into an agreement
- ◆ Immediately leave business meetings if commercially sensitive issues are being addressed

- ◆ Ensure that upon leaving the meeting, your action has been recorded in the minutes and you bring this situation to the attention of the company's Compliance Officer at the earliest opportunity.

Respecting the rules of competition is a duty incurred upon on all employees and managers. Any proven infringement will lead to appropriate disciplinary action in response to non-compliance of rules.

Compliance officer

We strongly recommend that you inform the Compliance Officer of any potential anti-competitive practices or of any doubts that you may have on the lawfulness of a practice under competition law.

ATALIAN employees are requested to:

- ◆ Deal honestly and fairly with all customers, regardless of the size of their business and always act in good faith
- ◆ Commit to providing customers with products and services that meet their requirements in terms of quality
- ◆ Provide accurate information on the products and services in advertisements, public statements and commercial offers
- ◆ Never communicate confidential information to outsiders.

1.3 Fairness towards suppliers and subcontractors

Suppliers and subcontractors must comply with ATALIAN's values. As such, they play a major role in client satisfaction. ATALIAN must maintain long-lasting and respectful relations with suppliers and subcontractors that are anchored in a process of transparency and sincerity.

As such, ATALIAN refuses to create situations of dependence with suppliers and subcontractors, by implementing suitable alternatives.

ATALIAN endeavors to procure its goods and services according to the criteria of price, quality, performance, delivery and relevance to needs, in order to safeguard its commercial interests.

2. Societal and environmental responsibility

2.1 Towards communities/local authorities

ATALIAN acts as a responsible and united company by:

- ◆ Promoting the development of the local economy
- ◆ Preserving employment. By the nature of ATALIAN's activities, the company offers many job opportunities across its various business lines
- ◆ Encourage employee involvement in ATALIAN's social initiatives or even volunteer to be involved in local life
- ◆ Adopt good citizenship behavior.

2.2 Towards the environment

As part of its commitment to sustainable development, in recent years, ATALIAN has integrated an environmental dimension into its strategy and culture.

In addition to the daily application of the ISO 26000 standard, ATALIAN is involved in ISO 14001 certified environmental management. Its handling of environmental protection matters is reflected in particular through continuous technological monitoring, which in turn offers clients products and services that have low environmental impact.

In this vein, ATALIAN is committed to complying with regulations and to having more environmentally responsible behavior, specifically with regards to climate change.

In 2012, a «Regulatory Assessment of Greenhouse Gases» emanating from the Group was carried out. The direct emissions of greenhouse gases from the different company activities were recorded and led to the implementation of an action plan to reduce them. For ATALIAN's French Cleaning Division, this GHG assessment was completed using the «Carbon Footprint» methodology developed by ADEME (French Environmental Agency), which also took into account indirect emissions.



B. Principles of the Group

RESPECT ♦ FAIRNESS ♦ DIVERSITY ♦ LOYALTY ♦ DISCRETION

1. Ethics within our human resources

The Group's employees represent the human capital of the company, which should be managed and preserved in all its complexity.

As part of its tasks, the Human Resources Department is committed to complying with the Universal Declaration of Human Rights and the fundamental conventions of the International Labor Organization (ILO).

1.1 Respect for persons and human rights

Promote personal development

ATALIAN offers its employees a work environment

that is conducive to their personal development and the establishment of relationships of trust. Moreover, ATALIAN endeavors to protect the human rights and freedoms of its staff. Hence the desire to ensure the protection of dignity, tolerance, diversity and mutual respect in the minds of all.

Each ATALIAN collaborator is invited to:

- ♦ Refuse all acts of discrimination
- ♦ Support and promote ATALIAN's commitment to Diversity.

ATALIAN favors:

- ♦ Loyalty and mutual respect in professional relationships.
- ♦ The rejection of any form of discrimination or harassment.
- ♦ The refusal of any form of physical, verbal or moral violence.
- ♦ Respect for employee privacy.
- ♦ The promotion of diversity and equal opportunity.
- ♦ Parity in the workplace.



Promote social dialogue

ATALIAN promotes a social dialogue that is of quality and endeavors to consult with social partners. Moreover, it ensures respect and consideration for employee representatives in each of the countries where the Group is present.

As such, ATALIAN is committed to:

- ◆ Complying with applicable laws and agreements reached with staff representatives
- ◆ Promoting constructive social dialogue
- ◆ Giving priority to collective bargaining.

1.2 Health and safety at work

ATALIAN sees its employees as resourceful assets. This is why ATALIAN has adopted an ambitious health and safety policy, dedicated to ensuring its employees a safe work environment. No compromise is tolerated in this matter and every staff member makes it his/her duty to contribute through responsible behavior, respect for the rules of safety, hygiene and health in the workplace, especially when working on client premises.

Information campaigns and talks are regularly organized for employees in order to help reduce the risks of accidents at work and occupational disease. Through its safety management systems (MASE, OHSAS 18001) programs, ATALIAN implements training sessions and internal controls, necessary to promote continuous safe work practices.

ATALIAN undertakes to:

- ◆ Comply with the laws and health regulations in force
- ◆ Implement best practices relating to safety in the workplace, the goal being to avoid, as far as possible, any dangerous situation
- ◆ Ensure the physical and mental integrity of employees.

In return, each employee is asked to:

- ◆ Comply with company rules and internal procedures
- ◆ Comply with the instructions of managers
- ◆ Be attentive when a talk is being given at the workplace
- ◆ Report to hierarchy any behavior, installation or situation likely to endanger the safety of the work environment
- ◆ Participate in accident prevention awareness sessions.



1.3 Recognising employment

All ATALIAN employees must feel they are encouraged to develop their career prospects.

ATALIAN particularly encourages staff mobility within the Group and promotes their training. During regular interviews with their managers, staff performance results are recognized and contribute to their career development. This will be based on the requirements of the company, as well as each employee's individual aspirations. ATALIAN encourages internal promotion.

ATALIAN also promotes the development of young talent within the group, through insertion, training and mentoring (professionalization and trainee contracts). ATALIAN complies with the national laws and regulations relating to the integration of persons with disabilities in the regular workplace and participates in actions aimed at guaranteeing their jobs.

2. Protection of ATALIAN property and resources

ATALIAN ensures that every employee is responsible for the proper use and protection of the property and resources of the Group. These property and resources include both fixed and non-fixed property, but also intellectual property rights, as well as company proprietary expertise.

2.1 Proper use of property and equipment

They are exclusively reserved for professional use, which entails the prohibition of:

- ◆ Diverting their use or using them for personal benefit
- ◆ Transforming or destroying them without authorization
- ◆ Using professional equipment for personal gain.

ATALIAN's Information Technology Charter helps each employee understand the company's security problems and to clearly perceive their rights and duties.



2.2 Intellectual Property and Confidentiality

Property rights may not be used for personal gain. As such, ATALIAN employees are encouraged to denounce and combat counterfeiting and protect any confidential data emanating from the Group.

For a Group such as ATALIAN, the confidentiality of information is one of the keys to maintaining our competitive advantage. Staff may be privy to information pertaining to the Group, which should remain confidential; to the extent that the disclosure of or premature revelation of said information, would incur prejudice upon the interests of ATALIAN.

Such information may cover the products, research, technical projects, industrial data, business and financial plans, as well as any element that may fall under the intellectual property and proprietary expertise of ATALIAN.

It is up to each and every person to ensure that this information is not disclosed outside the company or for that matter, even communicated to employees within the company who are not entitled to such information.

Moreover, strict confidentiality will enable the Group to prevent any risk of breach of applicable competition rules.

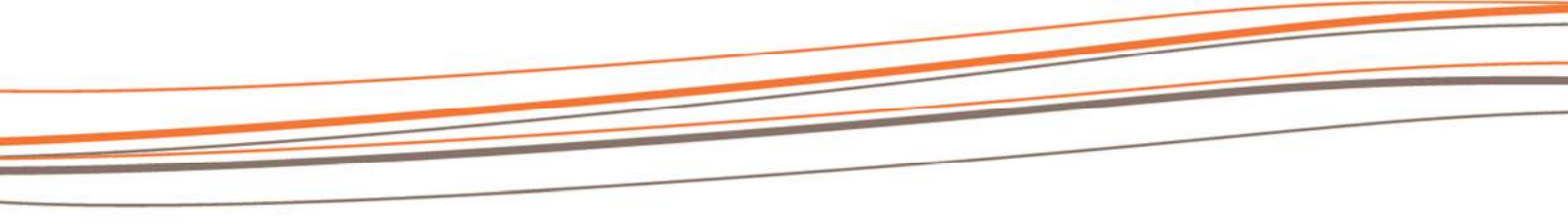
The quality of the Group's corporate image and the reputation of its services are requirements for its sustainability.

Group employees, being aware of their importance, undertake to refrain from the following acts:

- ◆ Denigrating company products and services
- ◆ Disseminating incorrect information
- ◆ Malicious use of the company name or its brands
- ◆ Making defamatory statements.

Employees have a duty towards confidentiality and loyalty which requires speaking with caution and restraint, both in the context of conversations within new discussion channels and or online social networks.





This Code defines the ethical framework in which we wish to carry out our business. After reading this Code, I urge you to adhere to the principles set out herein by signing the employee engagement Charter.

Franck Julien, Chairman of the Group

Glossary

Integrity

Quality of a person, his/her behavior, on an institution that is upright, honest (Larousse.fr)

Transparency

Social practice driven by sincerity and perfect access to information in matters affecting public opinion. This includes concern for the accountability of one's actions, recognizing one's mistakes. The primary goal of transparency is to establish a relationship of trust. It is the opposite of opacity. (Toupie.org)

Sustainable development

"Development that meets the needs of the present without compromising the ability of future generations to meet their own need" (Brundtland Report, 1987). Specifically, its main objective is reconciling economic and social development with the preservation of the environment, the latter being seen as a heritage to be passed down to future generations.

Dignity

Principle whereby a person should never be treated as an object or as a means, but as an intrinsic entity. A person deserves unconditional respect, regardless of age, sex, physical or mental health, social status, religion or ethnic origin. (Toupie.org)

Loyalty

Respect for truth, faithful to one's word and one's commitments; righteousness and honesty. (French Academy, ed. 1986)

Discrimination

In labor law discrimination is unequal and unfavorable treatment inflicted upon certain individuals, particularly due to their origin, their name, gender, physical appearance or membership in a philosophical, political or trade union movement. (dictionnaire-juridique.com). Examples: discrimination based on origin, sex, morals, sexual orientation or gender identity, age, marital status or pregnancy, genetic features, membership or non-membership, real or supposed, to an ethnic group, nation or race, political opinion, affiliation to trade unions or non-profit organizations, religious belief, physical appearance, family name, health or disability.

Harassment

Acts or remarks made against a person for psychological or physical destructive purposes. This is a form of abuse. It may be moral or physical. (Psychologies.com) Examples: physical or social isolation «silent treatment», daily put-downs, persecution, coercion, intimidation and humiliation.

Intellectual Property

This includes inventions, patents, trademarks, industrial designs and geographical denominations.

Extortion

Obtaining money by coercion or force

Glossary

Insider trading

Possessing confidential company information and using it to make financial transactions for one's own benefit or to benefit others before this information becomes public knowledge and thereafter decreases or increases the price of the company on the stock market (traderfinance).

Arrangements, cartels

A cartel implies a consensual agreement or a conscious effort to adopt a common (concerted effort) between several companies. Such conduct is prohibited when its goal is to distort competition and impede fair pricing and other business conditions that must be established by the mere interplay of supply and demand.

This arrangement can broach certain essential aspects of the market, namely fixing of buying or sale prices, on limits or control of production, commercial outlets, development techniques or investment.

There are two types of cartel arrangements: (i) between operators located on the same economic level – direct competitors (horizontal agreement) and (ii) between operators located on two different levels of the economy (vertical arrangements).

Such arrangements also take the form of swapping sensitive or confidential information. The exchange of information between competitors is anti-competitive when it eliminates uncertainty in the way that companies will behave. Pertaining information on the pricing and sales strategies that competitors wish to pursue, leads to a tacit coordination of behavior, which dissipates competition and brings about the risk of collusion.

Abuse of a dominant position

Abuse of a dominant position is characterized by the fact that a company exploits its dominant position in a market, in order to impose unfavourable conditions on a customer or supplier.

Proven existence of a dominant position does not place any blame on the company, only the abuse of the position can be sanctioned.

Abuse of a dominant position may take the form of a refusal to sell, tying practices or discriminatory commercial terms, as well as termination of established commercial relations, or the termination of commercial relations with the motive that the partner refuses to submit himself to unjustified commercial terms.

Conflicts of Interest

Proven or apparent situation in which an individual or an organization is subject to multiple interests stemming from one's duties or responsibilities while working in a public institutions, in a company, an association or a foundation. These multiple interests may come into conflict and can corrupt one's decisions or the way one acts. (Toupie.org)

ISO 26000

Adopted by 93% of the countries and organizations that are members of the ISO, ISO 26000 is a non-binding standard, which cannot be certified, it merely provides guidelines. It aims to facilitate support for Sustainable Development projects by enabling a structured approach while incorporating both the constraints and the key factors of success.

Glossary

To define the scope of their social responsibility, the standard calls organizations to form their approach around 7 core subjects, each identifying relevant areas in which the organization can base and set its priorities and establish its own actions:

- ◆ Governance of the organization.
- ◆ Human Rights.
- ◆ Relations and working conditions.
- ◆ Environment.
- ◆ Fair practices
- ◆ Consumer issues.
- ◆ Community and local development.

MASE (Manual for the Improvement of Company Safety)

It is a common reference for all industrial sectors, which allows implementing a management system for health and safety at work, which becomes part of a process of continuous improvement in the performance of Safety, Health and Environment.

It is based on five main points: a management commitment, competence and professional qualification of staff, preparation and organization of work, controls and continuous improvement. Its purpose is to establish a preventive system to avoid accidents and to prevent the occurrence of dangerous situations.

OHSAS18001

This certification allows any organization, regardless of its size or its industry to implement an internationally recognized Occupational Health and Safety Management System in accordance with OHSAS 18001. In this way the company can identify, mitigate and overcome the dangers related to health and safety by reducing risks; it also meets the regulatory requirements for prevention and allows for the protection of workers.

ISO 14001

This standard specifies the requirements for an environmental management system enabling an organization to develop and implement policies and objectives which take into account legal requirements and other requirements to which the organization subscribes, and information about significant environmental issues. It covers those environmental issues that the organization identifies as those for which it has the means to control and those for which it only has the means to influence. It does not establish per se specific environmental performance criteria.

ECOVADIS and SEDEX

Evaluation agencies that provide expertise on Corporate Social Responsibility (CSR), consisting of simple and reliable scorecards. This is a key element towards a responsible purchasing policy; it helps to reduce risk and improve supplier performance.

Reference documents

Internal documents

- ◆ Information Technology Charter
- ◆ Terms of telephone use
- ◆ Disability policy
- ◆ Employee Commitment Charter

ATALIAN supports international agreements

- ◆ Universal Declaration of Human Rights
- ◆ United Nations Global Compact
- ◆ Fundamental Conventions of the International Labor Organization



The QSE team is at your disposal for any further questions.

dqseg@atalian.com

Charter
Rights **Respect**
Regulations **Environment**
Integrity **Transparency**
Confidentiality **Dignity Humanity**
Atalian **Loyalty**
Ethics **Sincerity**
Responsibility **Fairness**
Security **Principles**
Attitudes **Discretion**
Protection **Values**
Exemplary Diversity
Code
Confidentiality Pedagogy



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