

ARAYMOND COMPLIANCE

GENERAL OVERVIEW

INTEGRITY AND ETHICS

As international expert in fastening and assembly solutions, ARaymond is committed to doing business the right way.

For more than 150 years, we have upheld standards of responsible and ethical behaviour in our own operations, and have looked for a similar commitment from our business partners. In all of the countries where ARaymond is present, our ambition is to conduct all our activities with integrity and respect.

In addition to our innovative management style, integrity and respect are the foundation that guarantees long-term visibility and a sustainable future for our enterprise.

They are the cement of our actions, they are the basis of the trust that we must have within our

organisation and with our business partners. Our Code of Conduct & Ethics defines the standards of behaviour for our workplace and gives us precise guidelines as to how we may protect the people within our organisation, the ARaymond Network, our business partners and the environment.

It also demonstrates our objective to respect industry standards and legal requirements wherever we are present in the world.

Integrity and respect are the foundation of our corporate culture, they are precious to who we are and we must never compromise this.

Antoine RAYMOND
President, ARaymond Network



RESPECT AND INTEGRITY

Abiding by the law and business ethics is the foundation on which all ARaymond entities operate.

A Code of Conduct & Ethics that covers all entities of the ARaymond Network has been issued, and is available to all stakeholders on a variety of media including ARaymond Network

websites and intranets.

Moreover, the ARaymond Network has put in place the necessary actions and tools so that integrity and compliance with rules remains a daily focus of everyone within our company.

Please consult our Code of Conduct and Ethics.

ARAYMOND COMPLIANCE PROGRAM

ARaymond has continued to deploy a worldwide compliance program to address the growing complexity of laws and regulations in the countries in which we operate and to further develop a common ethics culture.

The compliance program draws, in particular, on the ARaymond Network's corruption risk mapping.

This risk mapping is updated on a regular basis.

In addition to the Code of Conduct & Ethics, ARaymond has issued a series of **guidelines and internal controls** to prevent or detect any form of corruption and influence peddling.

Education and information campaigns are conducted throughout the ARaymond Network to raise awareness of compliance and ethical issues. Through dedicated sessions, we provide the most exposed functions, those who come into contact with external business partners, with the understanding and tools to act with integrity at all times.

Our **Whistleblower Procedure**, gives anyone from within the ARaymond Network or business partner the means to report any practices that violate our Code of Conduct & Ethics.

In order to **guarantee the independence and confidentiality** of the information conveyed

by the whistle-blower, ARaymond uses a **recognized and specialized third party SAFECALL**.



To declare an alert, you may contact Safecall via their website

www.safecall.co.uk/report
or by email: araymond@safecall.co.uk

Procedures for evaluating business partners with the help of specialized tools and databases are deployed throughout the Network to ensure that they are able to identify and address any issues of integrity.

Finally, ARaymond's compliance program draws on **internal control and accounting procedures** that have been strengthened and include the **Network's Internal Control and Accounting Manuals**.

ARaymond's compliance process is coordinated from its offices in Grenoble and handled by a community of local Risk & Compliance Correspondents under the leadership of the Global Risk & Compliance Manager and the Network's Chief Legal Officer.

THE ARAYMOND RISK & COMPLIANCE COMMITTEE

The work of the Risk & Compliance Committee is to oversee the compliance system, the whistleblowing procedure and contribute to ARaymond's operational excellence.

Comprising members of the Network's Executive Board, the Committee promotes the sharing

of best practices on legal and compliance issues. ARaymond's Risk & Compliance Correspondents maintain constant oversight in the countries for which they are responsible, build awareness, provide training and seek to prevent and detect any compliance issues that may arise.

FURTHER INFORMATION OR QUESTIONS

If you have any further questions with respect to the ARaymond compliance system or wish to discuss any issue, you may contact the Risk & Compliance Manager directly via

ethics-compliance@araymond.com