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# CODE OF ETHICS

Roxel's values every day



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# 1. THE ROXEL SPIRIT

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## AS A COMPANY

Our leadership strategy is based on permanent investment in Research, Technology and Development, on the best performance/cost compromise to satisfy our Customers' requirements, and on compliance with the highest standards of quality.

We set great store by honesty and clarity.

We build solid, lasting relationships with our customers and suppliers, based on mutual trust and benefit. We respect the stakeholders in our professional environment, including our competitors. We act with integrity: we comply with stringent accounting and reporting standards and we support anti-bribery initiatives. We protect and make the best possible use of the company's assets in the best interests of our shareholders. The Lean-Six-Sigma approach is widely deployed within Roxel with the aim of developing excellence, challenging ourselves at all times and rethinking the way we work.

## AS AN EMPLOYER

We want Roxel to be a good place to work. We know that our Employees are our main asset. They must be given a safe and healthy workplace, where talent and personal merit are recognised, where diversity is valued, where privacy is respected and where a fair work-life balance is taken into consideration. We believe it is important to offer our Employees a stimulating environment, motivating career prospects and the possibility of making changes.

We encourage a climate of openness, fortitude, generosity and respect, so that each Employee feels free to voice their questions, ideas and concerns.

## AS A CORPORATE CITIZEN

We are aware of the impact our activities have on the natural environment, including on biodiversity, and we constantly strive to reduce them. We are determined not to compromise the future in the name of the present.

We deliver complete solutions, from product design through to dismantling. We actively seek and give priority to partners who share our values and our ethical commitments.

## 1.1. PREAMBLE

The Roxel Group's ambition is built on values shared by all Employees and all the Subsidiaries. The Group's policy is to ensure that its operations conform to exacting demands in terms of honesty, integrity and professional excellence. These values must enable us to fully measure up to the trust that our Customers, Employees, Shareholders, Suppliers and all our Partners place in the Group. Roxel has therefore introduced rules of conduct via its Code of Ethics.

The aim is to ensure that the Code is applied at all times and by all Roxel Employees.

The Shareholder Committee, the Executive Committee and the Directors of the Companies in the Group are committed to ensuring that the Code is applied and respected at all times, without exception. This

commitment will be constantly reasserted in both Roxel's internal and external communications. The Code will be widely circulated within Roxel (including via the Intranet) to everyone handling national and international business, but also outside Roxel as requirements of our stakeholders (auditors, partners, Consultants and Agents, Customers, Suppliers, etc.).



Jacques Desclaux  
Chief Executive Officer

## 1.2. FOREWORD BY THE CHIEF EXECUTIVE OFFICER

Roxel's performance greatly hinges on the trust it inspires in its customers, employees, shareholders and partners.

We will only sustain our development by adopting a fair and honest attitude with all our stakeholders.

This trust stems particularly from the efforts made by Employees, the organisation and management to produce quality products, to defend Roxel's reputation and to comply with rules of business conduct. Thus, rules of good conduct, which are priorities for Roxel, were codified in a Code of Ethics in 2008. Today, Roxel's development must be further sustained by defending its values and principles, thus reaffirming the Group's ethical commitment and responsibility in all areas of activity.

We must ensure that our practices reflect our demands in terms of integrity, accountability and respect for our partners. Accordingly, I decided that our Code of Ethics should be revised to better reflect the importance of the Roxel culture in conducting business. In addition to embodying Roxel's commitment, these rules of conduct must encourage a concerted effort by our organisations and an improvement in our behaviours. Each one of us must therefore strive to comply with this Code, wherever we are and whatever we do.

This is a key factor of improvement and excellence, a vector of our ongoing quest for performance.

Read this Code carefully, comply with it and ensure others do around you.



### 1.3. FOREWORD BY THE EXECUTIVE COMMITTEE

We undertake to promote this Code of Ethics and to apply it every day in both spirit and substance.

Ethics concern the behaviour of all Employees in the Roxel Group and every corporate level, without exception. It concerns all Roxel activities, including innovation, design, production, marketing, administration, finance, communications, human resources, health and safety, logistics, methods and computing.

As ambassadors of Roxel, each one of us undertakes to observe this code of values. The content of this document is not optional.

The Roxel Group's reputation and our stakeholders' trust depend on us all.

### 1.4. APPLICATION OF THE CODE OF ETHICS

#### 1.4.1. Who does the Code of Ethics apply to?

The Code of Ethics applies to all Employees in the Roxel Group, to all corporate officers and to the members of Roxel's Executive Committee and the Executive Committees of Roxel France and Roxel UK. It is drafted in French and English and is available on Roxel's Intranet.

#### 1.4.2. How should the Code be used?

This Code is designed to help you understand what is expected of you as an Employee of the Roxel Group. It sets out the guiding principles. In addition to this Code, you also have a space dedicated to Compliance on the Roxel France and Roxel UK Intranet.

Feel free to seek advice on any ethical questions you may encounter.

Read the Code in full and refer to it if you have any questions about ethics. If you do not find the answer in it, don't hesitate to directly contact the Chief Compliance Officer. The Code of Ethics does not replace existing policies and you should continue to refer to all the rules and standards defined at your place of work. This Code has been designed to provide a framework for these policies and standards and to help you better understand the rationale and purpose thereof. Roxel acknowledges that the Code of Ethics is not exhaustive and that its content may be amended.

## 1.5. TOOLS FOR ETHICS

### 1.5.1. Business Ethics Committee (BEC)

A Business Ethics Committee has been created to ensure that Roxel's values are implemented and observed in each of the Group's subsidiaries. The members of the BEC are the Group CEO, the Executive Committee Members and, where a topic or matter is relevant to them, members of any other functions.



#### Areas of authority of the BEC:

- Updating the code and the rules
- The Code is regularly updated to integrate the latest applicable legal changes, and any relevant circumstances that justify them
- The Code must always be implemented in accordance with all regulations, whatever their nature and issuing authority (local, national or international)

### 1.5.2. Business Advisory Committee (BAC)

A Business Advisory Committee has been created to ensure that Roxel's procedures relating to the choice of intermediaries are implemented and observed.

The BAC comprises the Group CEO, the VP Sales and Marketing, the CFO and the Chief Compliance Officer and, where a topic or matter is relevant to them, members of any other functions.



#### Areas of authority of the BAC:

- Guarantees compliance with the Intermediaries Procedure (i.e. the procedure for selecting and monitoring consultants, service providers, and offset service providers) by tasking the Group Compliance Officer with managing and overseeing the Intermediaries approval procedure
- Oversees adequate implementation of the Procedure and deals with any problems that may arise on its implementation
- Approves recommendations concerning the update of the Procedure
- Continuously ensures the Procedure is circulated in the Group
- Is responsible for examining allegations of non-ethical behaviour and for managing their impact.

### 1.5.3. Whistleblowing

#### DEFINITION

The smooth running of Roxel requires all Employees to have the possibility of informing the Compliance department of a possible or confirmed breach of legal or regulatory provisions, of professional or ethical standards in force and of Roxel's internal procedures, in financial, accounting, anti-bribery, anti-competitive practice, disclosure of confidential information, conflict of interest, product safety and quality matters.

Whistleblowing is an internal alert system managed by the Chief Compliance Officer.

#### PRINCIPLES

The whistleblowing system is not designed to replace the other alert systems already in place in the company: hierarchical channels, staff representatives, etc.

Use of the whistleblowing system by Employees is not mandatory. No sanction may be imposed on an employee on grounds that the latter has not used it. Whistleblowing may not be used improperly by whistle-blowers. It may only be used where an employee has sufficient and objective reasons to think that illicit or inappropriate events or behaviours could create a serious risk for Roxel or one of its Companies.

Use of the whistleblowing system is strictly limited to reporting alleged facts which:

- Are serious
- Are presented objectively
- Have been directly witnessed by the whistle-blower
- Are materially verifiable
- Are directly connected and strictly necessary to the scope of application of the whistleblowing system.

The facts reported must only concern the following areas:



Accounting



Finance



Anti-bribery



Fight against  
anti-competitive  
practices



Disclosure of  
confidential  
information



Conflicts of  
interest



Product  
safety



Quality

Any alert which is processed on other matters will not be taken into account. Only the relevant data, in direct relation to the scope of the whistleblowing and strictly necessary to check the facts alleged would will be taken into account.

The whistleblowing may include one or more persons or any operation led within Roxel which would prejudice the interests of the company.

**Roxel France** has its own whistleblowing policy described into a dedicated process and authorised by the CNIL in accordance with the applicable regulations.

**Roxel UK** has its own whistleblowing policy named "Public Interest Disclosure Policy" which has been declared and authorized under the applicable regulations.

## 2. LEADERSHIP AND MANAGERIAL RESPONSIBILITY

### 2.1. LEADERSHIP MODEL

Leadership is a practice implemented to rise to Roxel's challenges. Recognised leaders know how to develop and communicate a vision of the future that has a powerful impact on their teams. Leaders give "meaning" to the conduct of business.

Roxel initiated a Leadership programme in 2014 in order to encourage agents of change to develop new skills and rise together to Roxel's challenges.

The Leadership model is based on the following values:



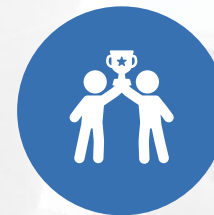
Join forces around a shared vision



Manage by example



Increase individual responsibility



Win as a team



Dare to innovate



## 2.2. COMPANY REPRESENTATION

Roxel's reputation depends on the way each one of us behaves.



### We must all:

- Stay focused on Roxel's interests in everything we do
- Reflect Roxel's Ethical Principles in our professional language and behaviour
- Make sure there is no confusion between our personal opinions or interests and those of the company
- Avoid giving our opinion of colleagues and their work on professional development sites (such as LinkedIn)



### We must not:

- Speak, write or make any commitment on Roxel's behalf without authorisation
- Speak or write about subjects outside our scope of expertise
- Use the Roxel headed paper or email address for our personal affairs or to express our personal opinions

Roxel has developed a system of delegation of authority whereby certain members may commit the company in some specific areas. The authority granted by such delegations enables the holder to bind the Company and facilitates the conduct of business. However, commitments made must be compliant with laws and regulations applicable to Roxel, with our internal procedures and with the content of the delegation.





## 2.3. THE MANAGER'S ROLE

Roxel brings its managers to the fore and has developed leadership. Managers have the following responsibilities:

- Set the example and promote ethical conduct
- Make decisions and be a source of ideas for complex, difficult matters
- Provide help with any requests for advice from their teams

Beyond their everyday behaviour that must be exemplary, some simple practices demonstrate the importance that managers attach to Roxel's ethical initiative, particularly:

- Always having the Code of Ethics to hand
- Never asking or suggesting that teams do not comply with the Code of Ethics
- Taking time to explain the Code of Ethics to new Employees
- Regularly reflecting on ethical dilemmas that may arise in business
- Discussing ethical skills at length during annual appraisals: particularly obtaining results honestly
- Recognising and valuing an Employee's particularly ethical behaviour

Employees may also hesitate to speak to their managers about their ethical concerns or questions. Managers must put them at ease by regularly reminding them that they are available to discuss any concerns and that no reprisals will be taken against an Employee who voices concerns in good faith.

Make sure you are informed of the Group's different ethical policies. You are responsible for informing your team of them. Also take time to listen to your Employees: it is never easy for them to talk about this kind of matter.

If you do not have the answer to their questions, you should refer them to someone who does. Ethical questions are rarely simple but they must not be avoided.

Financial or commercial targets are perfectly compatible with the objectives explained in the Code of Ethics. Roxel's interests can never be served positively by unethical or unlawful practices.

Ethical Principles apply to us all. The more responsibilities we have, the more we must set the example. A double standard would be unacceptable and contrary to Roxel's ethics.



# 3.

## ETHICS IN BUSINESS CONDUCT

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### 3.1. PROTECTING ASSETS

Everyone is responsible for the integrity of Roxel's assets. These do not only include furniture, buildings or intangible assets identified and defined by law. They also include ideas or know-how developed by Roxel Employees.

Lists of customers and sub-contractors or suppliers, market information, particularly concerning National Defence, technical or commercial practices, business offers and technical studies, and all data and information to which Employees have access in their jobs are part of Roxel's assets. These items are protected. And this duty survives even after an Employee's departure. No funds or assets of Roxel are used for unlawful purposes or any purpose not relating to Roxel's activities.

Therefore, facilities, equipment, funds, services and generally speaking, the Company's assets, are not used for personal purposes. Any such use is only authorised if it remains within reasonable limits, is justified by the need for a good work-life balance and is truly necessary.

Systems and networks may not be used for unlawful purposes, particularly to send racial, sexual or offensive messages. Everyone shall also refrain from making illegal copies of the software used by Roxel or from using any software in an unauthorised manner. All documents or data that are part of intellectual, industrial and artistic property, or know-how specific to Roxel, are protected.



## 3.2. ANTI-BRIBERY

The objectives deployed in the Roxel Code of Ethics are consistent with observing rules of business conduct.

As part of our ongoing improvement programme, rules of good conduct aiming to fight against bribery and corruption must be adopted.

In the context of increasing international and national regulations, Roxel has developed an anti-bribery compliance programme which is composed, *inter alia*, of:



Selecting intermediaries



Preparing bribery risk map  
and managing  
the associated risks



Mitigation conflicts  
of interest



Managing gifts  
and hospitalities

The fight against bribery and corruption essential to defend Roxel's interests and reputation.

## 3.3. CHOOSING SUPPLIERS

Roxel's relations with its Suppliers go beyond the mere purchase and supply of goods and services. They are essential to our company's long-term success. We are judged on the quality of our Supplier relations. In particular, we undergo audits that are attentive to our selection criteria and our Suppliers' undertakings to do business responsibly.

We are proud of our reputation as a company that openly negotiates and cooperates with Suppliers.

Our relations are based on principles of impartiality, fairness and loyalty, and we respect the independence and identity of our Suppliers.

### Roxel undertakes to:

- Select Suppliers through open and competitive calls for tenders
- Ensure that all bids are compared and treated in a fair and non-preferential manner
- Be transparent in call for tender procedures
- Ensure that our expectations as regards ethics are clearly understood and respected by all our Suppliers wherever they may be
- Help our Suppliers to meet our expectations
- Pay our Suppliers on the dates and in the manner agreed, unless there are legitimate reasons not to do so, such as a failure to deliver the ordered goods for example
- Ensure that our Suppliers are not excessively economically dependent on Roxel
- Protect our Suppliers' confidential information as if it were our own
- Not to impose improper conditions (particularly terms of payment, lead-times, etc.) on our Suppliers
- Not to continue working with a Supplier which has repeatedly failed to satisfy our expectations or which does not respect our ethical principles, particularly in Human Rights and/or anti-bribery matters



### 3.4. COMPETITION

Roxel respects all the stakeholders in its professional environment, including its Competitors.

Roxel's duty to set the example in this area is reinforced by our leading position in the tactical propulsion market. Sharing information with our Competitors about subjects such as pricing, costs or marketing strategies could give the impression of price-fixing or territorial division arrangements or other kinds of manipulation or distortion of the free market. Most countries have very strict laws in this area and we must be aware of and comply with them.

#### Roxel undertakes:

- Not to communicate or receive any commercial or strategy information from its Competitors
- Not to engage in any anti-competitive practices

### 3.5. CONFIDENTIALITY

Information is valuable. Disclosing internal information without being authorised to do so can cause a loss of value and be detrimental to Roxel. We must all protect internal information by strictly following the Group's applicable rules. Those of us who have access to confidential information about our business partners have the same duty to protect it against disclosure.

#### Roxel undertakes to:

- Restrict disclosure of internal information solely to persons on a need-to-know-basis, in the best interests of the company
- Keep all confidential, Customer and Supplier data safe, whether in paper or electronic form
- Prior to sharing internal information with people external to Roxel, check that we are authorised to disclose it and ensure a non-disclosure agreement is signed where necessary
- Not to discuss or work on internal information in public places where conversations may be overheard and data security compromised

Any information (written, electronic, verbal or in any other form) not publicly available and to which you have access as a Roxel Employee, must be considered internal. Revealing it, even to friends you trust, is not acceptable and may be detrimental to Roxel's interests.

## 3.6. PRIVACY AND PERSONAL DATA PROTECTION

We are all entitled to privacy. Roxel has particularly promised to respect the personal data of all its stakeholders and especially its Employees and business partners. Roxel only collects and keeps data required for its activities.

### Roxel undertakes to:

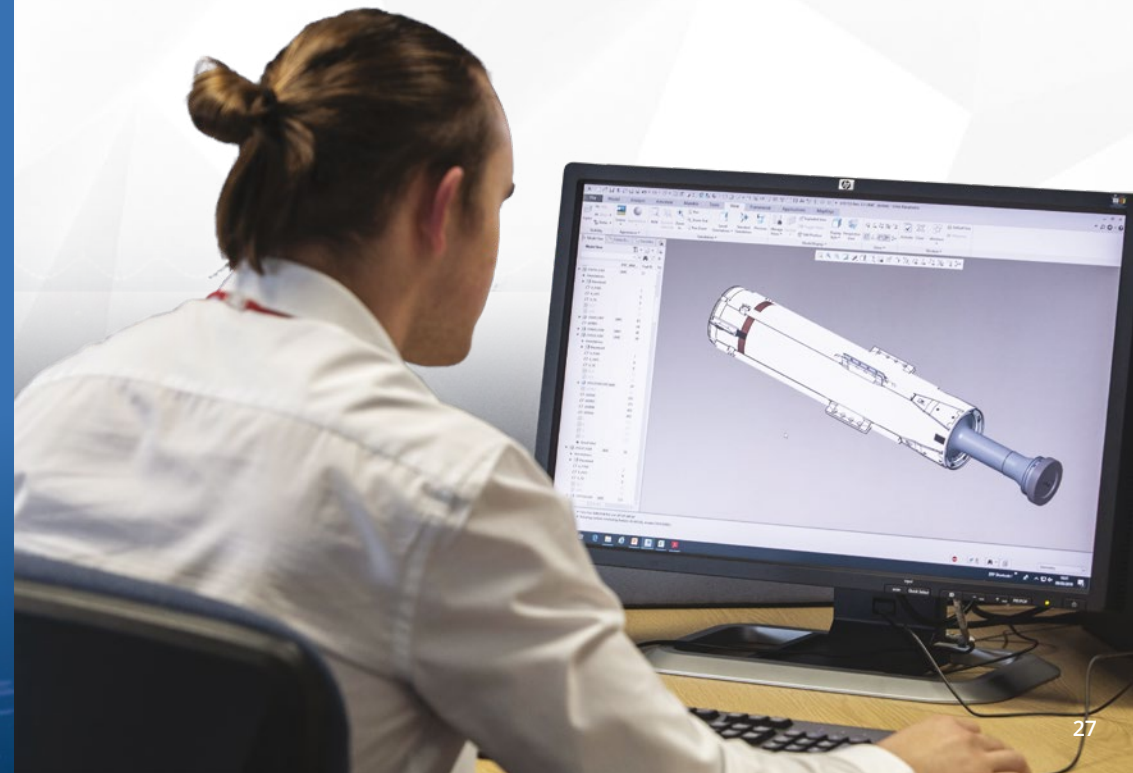
- Ensure that the persons from whom it collects personal data are informed of the type of information collected and the use thereof
- Only collect personal data that is necessary
- Ensure that we only transfer such information, within Roxel, to authorised persons and on a need-to-know basis
- Ensure that personal data is kept safely
- Seek advice before transferring personal data outside the country in which it was collected
- Guarantee our colleagues' right to privacy
- Ensure that these principles are observed by the service providers we may appoint to collect or use personal data
- Not to communicate personal data to anyone outside Roxel, save a legal obligation, use of technical service providers or if the person concerned has authorised us to do so. Personal data loss can have legal consequences, impact Roxel's reputation and be detrimental to the persons whose data has been lost.

## 3.7. INTELLECTUAL PROPERTY AND KNOW-HOW

Roxel's intellectual property is one of its most valuable assets. It includes patents, designs, trademarks, copyrights, confidential information and other exclusive information such as know-how.

Roxel establishes, protects, maintains and defends its intellectual property rights in all areas of business and uses them in a responsible manner, in compliance with all applicable laws and regulations.

Furthermore, Roxel implements an attractive policy to encourage Employees to further develop its know-how and its portfolio of intellectual property rights.





## 3.8. SOCIAL MEDIA

Facebook, YouTube, Wikipedia and blogs are all examples of social media, of online networks that enable social engagement and content-sharing.

Given the growing importance of these social media, it is vital for Roxel to define guidelines for our use of them, both at work and elsewhere.

Social media can have a huge impact on Roxel. As external communication tools, only the persons appointed by the CEO are authorised to communicate via social media on Roxel's behalf. No other person is authorised to represent Roxel on the different social media channels.

Remember that social media are a totally open environment; comments posted online are and permanently remain public.

### Roxel Employees :

- Always comply with the confidentiality provisions of their employment contracts, and with all other applicable obligations
- Do not use Roxel's visual identity, particularly logos, as it is only used for any official Roxel profiles on social media
- In the event of a crisis, accident or incident within the company, Employees avoid making reference to it, and spreading allegations or rumours on social media
- Are discreet on social media about their professional activity and their responsibilities within Roxel. This kind of information may be sensitive or even protected.
- Are always honest in their statements
- Are the ambassadors of Roxel and are therefore always mindful that their personal activities on social networks may be interpreted as representative of Roxel
- Apply the same rules of behaviour and courtesy online as in the real world



## 3.9. EXPORT & IMPORT CONTROL

Roxel designs and supplies high-tech products and services to its customers which are integrated into systems intended for the armed forces and national security. These products and services can guarantee domestic and international peace but they may also be a threat if they fall into the wrong hands.

Any non-compliance with legislation on export control could prevent Roxel from doing business on key markets and may result in significant penalties, both for Roxel and its Employees.

Roxel strictly complies with provisions governing export & import control and product and technology transfers in force in each country of intervention. The Company has introduced exacting standards applicable to all Subsidiaries and Employees.



### 3.10. QUALITY AND CONTINUOUS IMPROVEMENT

Roxel designs and develops sophisticated products. The trust our stakeholders place in us, whether Customers or Suppliers, is partly based on our capacity to guarantee application of the most stringent quality requirements.

Roxel is committed to a continuous improvement programme which particularly involves ISO9001, ISO14001 and EN9100 certification.

This Quality approach scrupulously applies the seven principles of quality management:

- Customer focus: understand and fully meet the Customer's need
- Leadership: define the best directions for the company
- Employee engagement: develop and harness Employee capabilities
- Process approach: manage resources and activities like a process
- Continuous improvement: make this goal a vector of the Group's overall performance
- A factual approach to decision-making: make decisions after analysing data and information
- Mutually beneficial stakeholder relations: develop synergies that enhance our ability to create value.

To reinforce this Quality approach, in 2014 Roxel also deployed Lean-Six-Sigma within the Group by raising employee awareness and training new Green Belts and Black Belts responsible for managing our improvement projects. Lastly, the Leadership initiative increases manager responsibility and federates all Employees around a positive, shared vision.



## 4. ROXEL'S SOCIAL RESPONSIBILITY

A full-page background image on the left side of the document. It shows a male worker in a blue industrial shirt and a black respirator mask with a circular filter. He is looking through a metal frame at a large, rotating industrial wheel, possibly part of a grinding or polishing machine. The background is a solid red wall.

### 4.1. ROXEL AS AN EMPLOYER

#### 4.1.1 Health and safety

Any person working for or with Roxel has the right to a safe, healthy and risk-free working environment; workplace safety depends on each one of us.

Roxel undertakes to:

- Take all reasonable precautions to provide a safe and healthy working environment at all times
- Train its Employees in what to do in an emergency and to comply with applicable health and safety procedures

#### 4.1.2 Diversity and gender equality

Roxel supports and promotes gender equality.

Within this framework, Roxel promises not to practise any discrimination against Employees particularly based on their gender, family situation, age, political or religious opinions, trade union activity, origins, race, colour or disability.

#### 4.1.3 Harassment

Roxel undertakes to respect the right to dignity which is a guiding principle in the way we work. Any behaviour or action that is contrary to this right, and particularly any form of harassment, is unacceptable.

Roxel undertakes to:

- Support and promote workplaces free from any bullying or sexual harassment
- Treat Employees with respect: we treat our co-workers and our business partners as we would like them to treat us

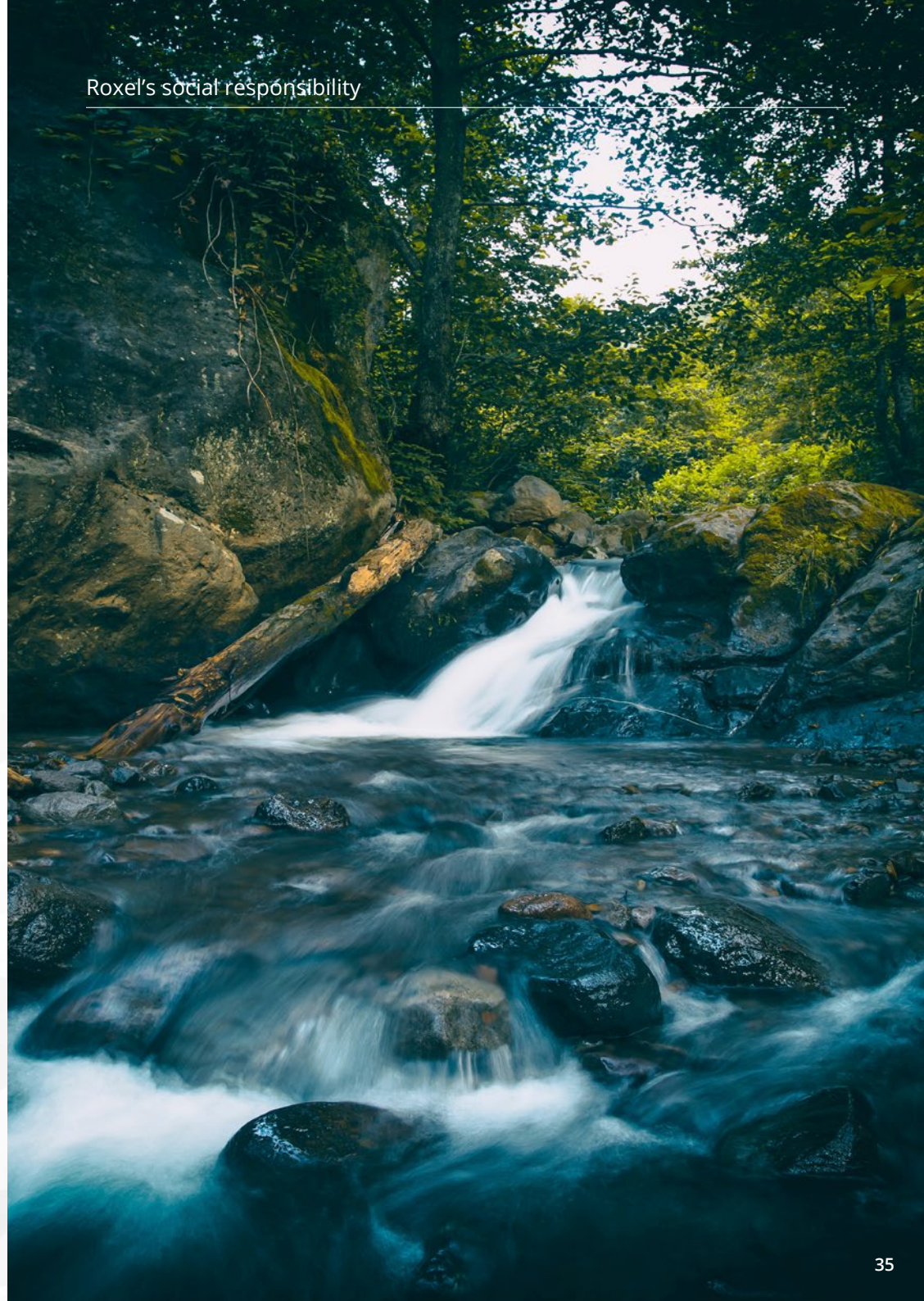


## 4.2. ENVIRONMENT

Roxel respects the environment and strives to minimise its impacts on it. Our goal is to communicate openly about our achievements and our challenges in this area. Numerous activities required to market our products have a direct impact on the environment. We are all responsible for seeking to reduce that impact whenever possible. In this area, each small action counts.

### Roxel undertakes to:

- Develop initiatives in favour of the environment
- Report any unusual discharge or emission into water or air to our line management or to our health and safety officer
- Take all necessary measures to comply with French, European and international regulations on environmental offences





# 5.

## APPENDICES



### 5.1. GLOSSARY

#### Affiliates / Subsidiaries

An interest held in the share capital for which the Roxel Group holds:

- less than 50% of the voting rights at General Meetings
- or the right to appoint or withdraw directors, while having less than the majority of voting rights on the Board of Directors

Within the present framework, joint ventures are considered Affiliates.

#### Business Agent

In accordance with the provisions of French law 91-593 of 25 June 1991, means any individual or legal entity appointed to negotiate and possibly sign Business Agreements for Roxel and on its behalf. A Business Agent works under a contract signed with Roxel for a fixed term.

#### Business contract

Contract for the sale or supply of goods and/or services signed and in force between Roxel and a Customer.

#### Employee

Means the employees, senior executives and corporate officers of Roxel.

#### Competitor

Means all companies or players operating in all or part of the tactical propulsion market.

#### Conflict of interest

Means a conflict between an Employee's mission and their private interests, which may influence the way they perform their duties. In other words, the conflict of interest may compromise the neutrality and

impartiality with which the Employee must accomplish their mission because of their personal interests.

#### Consultant

A person or legal entity of any nationality that has signed an agreement with Roxel, with a view to promoting, assisting, advising and providing support for Roxel's sales and marketing activities.

#### Corruption

Corruption includes the following practices:

**1 /** the promise, offer or award, directly or indirectly, of an undue advantage to any person who directs or works in a private sector entity, whatever it may be, for themselves or for another person, so that, in violation of their duties, they do or abstain from doing an act

**2 /** any person who directs or works in a private sector entity, in any capacity, directly or indirectly soliciting or accepting, an undue advantage, for themselves or for another person, in order to do or abstain from doing an act in violation of their duties

#### Customer

A public or private entity with which Roxel has signed or will sign a Business Contract or an Offset Contract.



### Director

Means, depending on the case, the Chief Executive Officer of Roxel (SAS), the Managing Director of Roxel UK, the Président Directeur Général of Roxel France or any senior executive to whom a Director may decide to delegate specific, delimited authority in writing to exercise their responsibilities according to this policy.

### Domestic countries

France and the UK.

### Donations or Contributions

Means all donations and contributions whether or not financial paid by Roxel to associations or foundations.

### Facilitating Payments

Small, non-official payments (from a few to several tens of Euros) made to Foreign Public Officials to accelerate or obtain everyday administrative procedures. In our Domestic Countries, they are prohibited by law.

### Gifts and Hospitality

Includes any object of value or any form of travel, accommodation, meal, subsistence, refreshment, entertainment, possibility of studying or attending classes or any other benefit granted or received by an Employee or by Roxel.

### Intermediary

A Consultant, a Service Provider, an Offset Service Provider, or a Business Agent.

### Offset Service Provider

Any commercial entity dedicated to offset (or the dedicated department of commercial or industrial companies) which may assist Roxel in fulfilling its offset obligations, through engineering projects, bank transactions, offset credit swaps and/or by means of capturing eligible commercial flows.

### Public Official

Someone holding a legislative, administrative or judicial position in a given country (including all levels and sub-divisions of local or national government), whether appointed or elected; any person exercising a public function in a given country, including public agencies and public companies; and any official/civil servant or agent of an international public organisation.

### Representation

The document to be signed by the legal representative of a potential Intermediary, as appended to the questionnaire, whereby the Intermediary confirms that it acknowledges and undertakes to comply with the provisions of the OECD Anti-Bribery Convention and other international instruments, with all relating legislation applicable in the country concerned, and to fulfil its obligations in accordance with laws and regulations in force. The terms of this document are non-negotiable.

### Roxel or Roxel Group

Depending on the case, Roxel SAS and its Controlled Companies, namely Roxel France and Roxel UK, individually or together.

### Service Provider

Any entity, of any nationality, that has signed an agreement with Roxel as part of its ordinary business and is authorised to provide particular services not directly linked to the signing of a Business Contract (e.g. economic intelligence, marketing surveys). A Service Providers facilitates access to a market or a customer.

### Supplier

Means any service provider or any subcontractor which provides services or supplies products to Roxel.

## 5.2. ABBREVIATIONS

### BAC

Business Advisory Committee

### BEC

Business Ethics Committee

### OECD

Organisation for Economic Cooperation and Development







[www.roxelgroup.com](http://www.roxelgroup.com)