

# Aéroports de Paris Group Ethics Charter

## INTRODUCTION

The Aéroports de Paris<sup>1</sup> ethics charter is underpinned by a set of basic principles designed to guide the behaviour of personnel in the workplace: responsibility, integrity, and respect for others. None of these principles are new; they are listed in the existing codes of professional conduct. However, since it formalises and reasserts principles that are respected and with which people within Aéroports de Paris Group are already familiar, the Group ethics charter presents them within the framework of a wider strategy and bolsters them. Thus, through this charter, which is shared with all of Aéroports de Paris' partners, the Group is going one step further.

We ask all Group employees – irrespective of their position, their level, or the country in which they are working – to ensure that the professional ethics principles detailed in this charter are applied. The Group will spur all people acting on its behalf, or in its name, to comply with the same principles.

Board members and employees alike are responsible for ensuring that the Group's ethics charter is applied and shared with all of the Group's representatives, external partners and co-contractors (suppliers, customers, service providers and subcontractors in particular). Each and every person must undertake to comply with the legislation in force in the various countries in which the Group operates, together with the Group's policies, standards and principles.




**Augustin de ROMANET**  
Chairman & CEO  
Aéroports de Paris



**Patrick JEANTET**  
Chief Operating Officer  
Aéroports de Paris



**Patrice BELIE**  
Chief Executive Officer  
Hub One Group



**Christophe CALMES**  
Chairman  
HUB SAFE



**Frédéric DUPEYRON**  
Chief Executive Officer  
Aéroports de Paris Management



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Chief Operating Officer  
ADP Ingénierie

<sup>1</sup> ADP SA, ADPI, ADPM, HUB SAFE, Hub One Group

# Aéroports de Paris Group Ethics Charter

## EACH EMPLOYEE UNDERTAKES TO ASSUME RESPONSIBILITY FOR APPLYING THE GROUP'S ETHICS CHARTER

### THE 9 BASIC PRINCIPLES THAT MUST BE COMPLIED WITH

#### *Compliance with legislation and regulations:*

all employees shall, in all circumstances, act in compliance with the legislation and regulations applicable in the countries in which the Group operates. All employees must also play a part in the reviews and audits conducted within the framework of internal checks and help ensure compliance with the Group's commitments.

#### *Respect for individual rights:*

all employees are entitled to respect for their fundamental human rights, particularly in relation to human dignity and protection against all forms of violence, harassment and discrimination. All employees shall help to instil high-quality professional relationships based on honesty, loyalty and respect for all persons.

All employees have the right to respect for their private lives. The Group undertakes to comply

with all legislation and regulations which govern the protection of employees' personal data.

#### *Compliance with the principle of non-discrimination:*

all employees have the right to equal opportunities, and to have their individual skills acknowledged and valued. The Group promotes diversity and undertakes not to discriminate against people in any way in its human resources policy.

#### *Compliance with health and safety rules:*

the Group undertakes to maintain health and safety standards in the workplace in accordance with the applicable rules such that neither the health, nor the physical or psychological integrity of its employees shall be compromised. All employees are responsible for the safety and protection of other people.

### *Compliance with the principles of loyalty, fairness and integrity:*

all employees undertake to ensure that they treat all others in exactly the same way. They must never accept or offer gifts or any other form of benefit that may run the risk of compromising the impartiality of decisions.

The Group undertakes to fight all forms of corruption, money laundering and insider trading. Employees are asked to perform their various tasks in such a way as to benefit the whole Group. This involves helping to prevent fraud and avoiding any conflicts of interest or insider trading.

The Group complies with all legislation that forbids or regulates the financing of political parties and undertakes to practise responsible lobbying.

As regards communication, in particular directed to shareholders and the general public, all employees shall help, at their level, to ensure that information provided in financial and professional documents is accurate. They must also ensure that the information that they convey is honest.

### *Compliance with the company's image:*

all employees protect the Group's reputation, both through the way in which they behave and any statements they may make. Maintaining the Group's high-quality corporate image is vital if its business is to develop and prosper.

### *Compliance with confidentiality requirements:*

all employees are responsible for respecting the confidential nature of any information to which they are privy in order to protect the Group's tangible and intangible assets. They must also protect

any confidential information about the Group's customers, passengers and partners (suppliers, subcontractors, etc.).

### *Compliance with the principles of fair competition:*

Aéroports de Paris Group operates in compliance with the principle of freedom of trade and industry. As such, it shall refrain from undermining the right to free competition through any illicit agreements, active or passive corruption, influence peddling or favouritism.

### *Safeguarding the environment and the company's corporate social responsibility:*

all employees are required to disseminate details of the Group's environmental policies, promote the sharing of examples of best practice and encourage innovation in this area. All of the Group's employees also undertake to incorporate the company's corporate social responsibility aims into what they do. The Group strives to behave responsibly in relation to its stakeholders and undertakes to invest aid and subsidies in its surrounding regions in a way that is transparent and supportive, through its corporate foundation in particular.

In addition to the Group's ethics charter, the Group formulates specific policies or makes specific commitments regarding certain issues. This includes its Corporate Social Responsibility, protecting data, ensuring the security of its information systems and procurement.

## IMPLEMENTATION

This charter applies to all personnel, regardless of status (salaried employees, trainees, temporary staff...) of any of the companies that make up Aéroports de Paris Group and all other persons (service providers, suppliers...) acting on behalf of, or in the name of, any one of them.

Compliance with the ethical principles detailed in this charter helps to raise the Group's visibility, improves its performance and protects it against any risks which may hinder it in the way in which it operates, compromise its future or harm its reputation.

In order to inform its employees' behaviour in relation to ethics, Aéroports de Paris Group has set up a special department exclusively for ethical issues. This department has a compliance officer who reports to the Group Secretary General.

The Group's compliance officer helps define rules and obligations in relation to professional ethics and ensures that this ethics charter is properly implemented. The compliance officer also contributes to the prevention of risks of an ethical na-

ture, by fostering professional practices that are in compliance with the Group's commitments.

The main tasks entrusted to the compliance officer include:

- developing and promoting the Group's ethics policy, helping people to become familiar with it through awareness-raising exercises, training and communication
- ensuring that ethical considerations are factored into all major projects and strategic policies
- ensuring the Group's compliance with regulatory requirements and the Group's ethical aims.

In the event of any doubt in relation to the implementation of, or compliance with, the principles detailed in this charter, employees shall refer to their line manager or the employer representative most appropriate to the situation who will inform them of the right conduct to adopt.

The Group's compliance officer is also ethics officer. This person may be consulted directly, in complete confidentiality, by any of the Group's employees, in order to obtain clarification on the application of this charter and guidance on ethics-related issues.

The Group's compliance officer may be contacted by email at: [referentethique@adp.fr](mailto:referentethique@adp.fr)