

CODE OF ETHICS



ATOZ
S E R V I C E S

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1. PREAMBLE

Building on our unique approach over the last twenty years, we at ATOZ Services are committed to our customers, and want to give meaning to our mission more than ever: to deliver the best service to customers, in a spirit of constant excellence and innovation.

The choices we make are therefore guided by our values: team spirit, customer focus, excellence and innovation, respect and integrity. The development of our activities is firmly rooted in our desire to build lasting relationships with our customers and partners, based on mutual trust and interest. Likewise, each and every one of our employees is an ambassador for these values and acts with integrity in all circumstances and places. We believe that respect for ethical rules and the fight against all forms of discrimination are demanding and essential.

This is why we have decided to give concrete expression to our commitment by means of this Code of Ethics, which aims to formalise our policy in this area, to set out the ethical standards and principles which our employees are expected to adhere to, and to bring them to the attention of all ATOZ Services stakeholders.

2. THE CODE OF ETHICS

2.1. Objectives of the Code of Ethics

The purpose of this Code of Ethics is to set out the standards and principles that ATOZ Services employees have to follow when faced with ethical dilemmas in the workplace. It also enables all ATOZ Services stakeholders to act responsibly. Beyond the legal aspect, it marks the Group's commitment to the public interest. This Code is subject to change.

If an employee has questions about ethics, it is important to refer to this Code. If they have any questions, they can also ask the Group's Partners for clarification.

This Code of Ethics is complemented by a whistleblowing procedure put in place when an employee has doubts about practices that could affect the company (see page 8 of this Code).

2.2. Implementation of the Code of Ethics

This Code applies to all ATOZ Services activities and to all employees.

The principles set out in this Code enable ATOZ Services to maintain and strengthen the trust of its clients and stakeholders. It is the responsibility of all ATOZ Services employees to be aware of, respect and ensure compliance with the values and commitments contained in this Code.

Failure to comply with all or part of this Code may result in sanctions, subject to compliance with local regulations on disciplinary law.

3. COMPLIANCE WITH LEGISLATION

ATOZ Services is committed to complying with the laws and regulations relating to the principles of loyalty and ethical principles in force in the places where it carries out its activities.

All ATOZ Services employees are responsible for being aware of and complying with applicable local laws and regulations, as well as the policies and guidelines of the company which they are assigned to, which relate to their areas of activity.

4. OUR COMMITMENTS AS A COMPANY

ATOZ Services aims to build and maintain lasting relationships based on trust with its customers and partners. This trust is built over the long term through a process of continuous improvement.

4.1. Customers

ATOZ Services 's priority is customer satisfaction. The Group is therefore very attentive to their requirements and ensures that the service provided is always of the highest quality. Our relationship with our clients is based on trust, so that we can understand their expectations and create value for them.

4.2. Suppliers and subcontractors

ATOZ Services attaches great importance to the fair and transparent choice of suppliers. They are chosen according to a fair and impartial procurement and selection process based on pre-defined, explicit and transparent criteria: quality, cost, timeframe, and also taking into account the environmental and social impact of the products offered, and in accordance with our Responsible Procurement Policy.

ATOZ Services treats its suppliers honestly and fairly, complying with all applicable laws and regulations, paying suppliers in accordance with the terms of their contracts, and respecting payment deadlines, provided that they have fully met their obligations.

4.3. Fair practices and compliance with regulations

ATOZ Services suppliers adopt ethical business practices and undertake to comply with the laws and regulations relating to the principle of fairness in force in the countries which they operate in. In this way, they ensure that competition rules are respected so that they are fair and honest. All unfair practices are prohibited.

4.4. Gifts and invitations

ATOZ Services employees must not under any circumstances accept gifts or invitations, or any form of gratuity, over and above the company's usual practices, and in accordance with the Anti-bribery and anti-corruption policy. When a gift or invitation is received in the course of an employee's duties, they are required to keep their superiors informed and to be transparent. It is important to ensure that any gifts received are in line with ATOZ Services 's ethical principles.

4.5. The fight against corruption and conflicts of interest

In the exercise of its activities, ATOZ Services refuses and condemns all practices linked to corruption or influence peddling. We have zero tolerance of corruption. We fight against all forms of corruption, whether active or passive, and exclude ourselves from any situation that could present a conflict of interest. It is essential to be wary of any practice aimed at influencing a business decision.

It is essential for employees to inform their superiors of any actual or potential conflict of interest that could influence their judgement and decisions, in accordance with the Anti-bribery and anti-corruption policy.

4.6. The fight against fraud, money laundering and terrorist financing

ATOZ Services expects its business partners and clients to ensure that the source of all funds is legal and complies with anti-money laundering and anti-terrorist financing laws and regulations. If an employee witnesses an act of attempted fraud, they have a duty to inform their superiors through our anti-money laundering and anti-terrorist financing procedures.

4.7. Confidentiality and data protection

ATOZ Services is committed to keeping the technical, commercial and financial information communicated by its customers, partners and employees confidential, and to protect their personal data in compliance with the regulations in force. Before sharing internal information with anyone outside ATOZ Services, it is important to check whether it can be communicated. In addition, ATOZ Services undertakes to retain only the data necessary for its activities or to comply with its legal and regulatory obligations. Customers and employees are informed of the procedures for collecting, managing, storing and accessing authorised data in accordance with the General Data Protection Regulation (GDPR) (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data.

4.8. Protection of company assets

All ATOZ Services employees are expected to protect the property and resources entrusted to them in the course of their work. Their resources and assets must be used in connection with their professional activities. We believe that every ATOZ Services employee has a role to play in the day-to-day fight against fraud by exercising vigilance in protecting information relevant to their responsibilities, in order to protect the organisation from misappropriation or fraudulent use of its tools, data or other resources, in accordance with our Customer Data Management Policy.

4.9. Respect of intellectual property rights

ATOZ Services is committed to respecting intellectual and industrial property rights, and to complying with national and international law; it will not exploit, sell or use the property of a third party, any trademark, patent or copyright.

5. OUR COMMITMENTS AS AN EMPLOYER

ATOZ Services is committed as an employer to promoting a safe and healthy working environment for its employees. Human rights are respected and ATOZ Services ensures that there is no discrimination or harassment of any kind.

5.1. Respect for Human rights

We are committed to respecting and promoting the fundamental principles and rights described in the 1948 UN Universal Declaration of Human Rights, as well as the working conditions required by the Conventions of the International Labour Organisation (ILO), and to complying with the legislation in force in each territory where we operate. We also ensure that human rights are respected throughout our supply chain and monitor the practices of our suppliers.

5.2. Hygiene, health and safety

The health and safety of our employees is one of our priorities.

We strive to maintain a safe and healthy working environment that complies with all relevant regulations. We are committed to implementing a health and safety policy that aims to guarantee each employee a working environment that does not present any danger to their health and safety, to maintain an environment in which the dignity of individuals is respected (ILO conventions No. 155 and No. 120) and to take all necessary measures to limit the number of work-related accidents that may occur in the course of an employee's day-to-day duties.

5.3. Effective abolition of child labour

ATOZ Services attaches particular importance to the prohibition of child and forced labour. Our suppliers are prohibited from employing children in violation of the provisions of the International Labour Organisation Conventions (ILO Conventions No. 138 and No. 182).

Prohibition of all forms of forced or compulsory labour.

No supplier shall under any circumstances use forced or compulsory labour or slavery, or any other practice of servitude or involuntary labour, as defined in ILO Fundamental Conventions No. 29 and No. 105.

5.4. Working hours and pay

ATOZ Services is committed to complying with all regulations which it is subject to relating to remuneration, benefits and working hours, in particular those concerning the minimum wage, overtime pay, piecework pay and any other element of remuneration and limits on working hours and benefits (ILO Conventions Nos. 1, 30, 95, 100, 131, 163 and 171).

All forms of work, including overtime, are voluntary. Employees are free to leave their jobs as long as they respect the notice period specified by law.

5.5. Moral and sexual harassment

ATOZ Services will not use verbal or physical threats, physical violence, sexual abuse or any form of harassment (ILO Conventions No. 29 and No. 111). It is essential to be respectful of each other and to treat our employees as we would like to be treated. Every employee has the right to respect and human dignity.

5.6. Elimination of discrimination

ATOZ Services prohibits all forms of discrimination, exclusion or preference based on race or ethnic origin, gender, religion or belief, political opinion, trade union activity, disability, age or sexual orientation in recruitment and career development, and ensures equal treatment (ILO Convention No. 111).

5.7. Equal opportunities based on merit and ability

ATOZ Services is committed to promoting equal treatment and equal opportunities in accordance with the ILO's fundamental conventions No. 100 on equal remuneration for men and women for work of equal value and No. 111 on the principle of non-discrimination.

5.8. Trade union freedom and the right to collective bargaining

ATOZ Services and its suppliers recognise and respect the employee's right to freedom of association and collective bargaining as defined in ILO fundamental conventions Nos. 87 and 98. They ensure respect for trade union independence and pluralism and are committed to promoting collective bargaining as a central element of social dialogue. ATOZ Services also recognises the right of its employees and associates to join a trade union organisation of their choice.

6. OUR COMMITMENTS AS A RESPONSIBLE CORPORATE CITIZEN

We are aware of the impact of our activities on the environment and we strive to minimise this impact. It is the responsibility of every ATOZ Services employee to try to reduce this impact wherever possible. The environment is a major concern for ATOZ Services and we are committed to its protection. Our environmental policy covers issues such as saving natural resources and combating global warming.

We are committed to fulfilling our mission of delivering the best possible service to our customers, in a spirit of constant excellence and innovation, in line with our values, which are based on team spirit, customer focus, excellence and innovation, respect and integrity. Based on these values we have since formalised our commitment and structured our CSR approach, in order to improve the impact of our activities and create shared value, not only for the men and women who work in our Group on a daily basis, but also for our clients and partners.

Aware of the social and environmental challenges that we have to meet together, we are constantly striving to improve the quality of working conditions for our staff and to reduce the environmental impact of our activities, in synergy with our partners.

As a leading player in our field, it is fundamental to achieving these objectives that our partners share the same values. That's why we invite them to take note of our commitments, set out in this Code, and to join us in our ambitions so that we can build lasting relationships based on trust and work together to achieve continuous progress.

To respond to the major challenges of sustainable development and develop our service offering, we have based our CSR commitment on the following three pillars:

- To be a committed player in favour of well-being in the workplace and to maintain a climate of trust conducive to team spirit;
- Innovate in synergy with our customers to meet the challenges of tomorrow, and take into account their social, environmental and governance issues;
- Reduce the environmental impact of our activities by limiting our carbon footprint and taking steps on a daily basis to help protect the environment.

6.1. Environmental responsibility

We are working to consider each of the environmental impacts of all our activities, for our employees, our clients and our partners, and we are always going further to reduce this impact. ATOZ Services, through all its employees, respects eco-gestures and good environmental practices both within our Group and with our clients.

6.1.1. Respect of environmental laws and regulations

We are committed to applying existing international, national and regional environmental regulations, and to meeting requirements relating to air, soil and water quality and pollution. We have adopted environmental measures to ensure continuous improvement in our performance in terms of environmental impact, including compliance with all applicable environmental laws and regulations throughout our value chain.

6.1.2. Circular economy and waste management

One of the ways in which we reduce our impact on the environment is through our commitment to limiting the pollution generated by our activities. We take care to manage waste responsibly, working to reduce it at source and exploring ways of reprocessing, recycling and reusing it. By digitalising our activities, we are making sure that the environmental impact of paper consumption is kept under control.

6.1.3. GHG emissions and sustainable use of resources

We are committed to limiting our impact on the environment by assessing and reducing our greenhouse gas emissions and measuring our energy and water consumption. We are implementing programs to improve our energy efficiency, optimise the use of water and non-renewable natural resources or non-environmentally friendly products.

6.1.4. Promoting corporate responsibility

We are committed to promoting a socially responsible approach among our suppliers and sub-contractors in order to disseminate and apply the principles of this Code of Ethics throughout the value chain.

7. WHISTLEBLOWING SYSTEM

7.1. The right to whistleblowing

The Ethics Whistleblowing right is a right given to ATOZ Services employees and other stakeholders to report a situation that does not comply with the principles set out in this Code.

If an ATOZ Services employee or any other stakeholder is confronted with facts, allegations or behaviour that are likely to contravene the principles of this Code, falling within the scope of:

- Corruption;
- Anti-competitive practices;
- Breaches of personal data and information security;
- Forced labour, child labour or trafficking of human beings;
- Discrimination or harassment;
- Human rights violations.

they must react in accordance with the alert procedure detailed below.

8. WHISTLEBLOWING PROCEDURE

If an ATOZ Services employee faces an ethical problem or a breach of the rules of this Code, they should refer to the internal Whistleblowing Policy.

CONCLUSION

ATOZ Services is committed to ensuring the application of this Code and the proper functioning of its whistleblowing procedure by making the principles of this Code known to all its stakeholders: employees, customers, partners and suppliers, and by ensuring its proper promotion throughout its value chain, wherever it operates.

ATOZ Services relies on the commitment and responsibility of everyone to uphold the values of this Code, and to continue to make ethical principles and the fight against all forms of corruption, discrimination and breaches of human rights essential and irrevocable rules in relations between stakeholders.



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