



# CODE OF ETHICS AND COMMITMENTS

# EDITORIAL

By adopting, as it does every year, its code of ethics and commitments, the Altice France Group reaffirms its deep attachment to the principles that it intends to promote in the context of its activities.

In this context, the purpose of this code is to set the course for the ethical and responsible approach in which we engage in order to respond to the concerns of our customers, partners, suppliers and, more generally, the entire society.

I therefore invite all employees and partners of Altice France to take good note of the commitments it makes, to make them their own and to apply them on a daily basis.

I am naturally counting on your involvement because it is by acting all together, each at our own level, and with the ambition to go even further in respecting and implementing these principles, that we will be able to make these values dear to Altice France prosper.

**Alain WEILL**  
Chief Executive Officer

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# OUR ETHICAL BUSINESS PRINCIPLES

## **The Group has adopted a set of rules of conduct summarized and formalized in this Code of Ethics and Commitments.**

Each of the group's employees must feel responsible for the conditions in which the company applies these rules of conduct day after day and must respect them.

### **THESE RULES ARE AS FOLLOWS:**

- respect the laws and regulations in force, whether national or international;
- respect the dignity and rights of our employees, customers, industrial and commercial partners, whether they are human rights or property rights, whether these rights are set out in national or international texts ;
- avoid situations of personal conflicts of interest, which would or could be contrary to the interests of the company ;
- protect the personal data of its customers (General Public, Companies and Operators) and its employees;
- protect the group's assets and resources ;
- encourage any internal or external initiative that contributes to improving our social, societal and environmental responsibility in order to move towards the sustainable development of our society.

## **This code is also inspired by several international references**

whose principles are shared by the Group

### **IT IS :**

- the United Nations **Universal Declaration** of Human Rights;
- the **European Convention** on Human Rights;
- various **Conventions of the International Labour Organization**, in particular Conventions 29, 105, 138 and 182 (child and forced labour), 155 (safety and health of workers), 111 (discrimination), 100 (remuneration), 87 and 98 (freedom of association, right to organize and collective bargaining);
- the **United Nations Convention** on the Rights of the Child and against corruption;
- the United Nations **Global Compact** and its principles.



**OUR OBJECTIVES  
AND  
COMMITMENTS  
WITH REGARD TO OUR  
KEY AUDIENCES**

# 1. WITH REGARD TO **OUR CUSTOMERS AND CONSUMERS**

## **OBJECTIVE**

develop products and services that best satisfy our customers and consumers and earn their trust.

## **COMMITMENTS**

- communicate in a clear and transparent manner on the conditions of access to services, including both legal and price conditions;
- communicate the environmental performance of mobile phones in SFR stores and on the online store
- maintain a permanent dialogue with consumer associations in order to take the measure of the needs and wishes expressed by their members and, where possible, translate them into product and service offers ;
- to keep our audiences informed on matters relating to radio waves, health and mobile telephony, without adopting a scientific position, and to relay the recommendations of health authorities for the responsible use of mobile terminals.

# 1. WITH REGARD TO **OUR CUSTOMERS AND CONSUMERS**

- regularly inform our customers and consumers, through dedicated communication channels, of current national and international studies regarding electromagnetic fields and the assessment of their possible impact on health;
- implement the legal means necessary to prevent and, where appropriate, avoid the dissemination of content contrary to respect for human dignity and to laws and regulations ;
- provide means, including technical means, to prevent access to certain services or content with a view to protecting children ;
- implement the legal means necessary to prevent the sending of unsolicited messages and the recourse to unfair commercial practices ;
- assist our customers and prospects in the new uses of the products and services we offer ;
- promote accessibility to our products and services for disabled persons.

# 1. WITH REGARD TO **OUR CUSTOMERS, CONSUMERS AND COLLABORATORS**

## **OBJECTIVE**

guarantee the protection of personal data and respect privacy.

## **COMMITMENTS**

- implement the regulatory and legal provisions (RGPD, the amended *loi Informatique et Libertés* and the recommendations of the CNIL - Commission Nationale Informatique et Libertés) on the protection of personal data;
  - define compliance governance by appointing a Data Protection Officer (DPO), who relies on business relays to implement compliance as close as possible to the operational teams;
  - inform customers about the use of their data through our personal data protection policy and our general terms and conditions ;
  - raise awareness and train group employees on their rights and obligations related to personal data in the context of their professional missions;
- implement means and processes to ensure that personal data are processed in a manner that respects in particular :
    - the principles of transparency and loyalty with determined, explicit and legitimate purposes;
    - minimisation of the data processed ;
    - the exercise of rights by data subjects (access, portability, rectification, erasure, restriction and objection);
    - the guarantees required in the case of data transfers to third countries ;
  - implement appropriate technical and organisational measures to protect the personal data of customers and employees.

## 2. WITH REGARD TO **OUR COLLABORATORS**

### **OBJECTIVE**

preserve the health and safety of our employees.

### **COMMITMENTS**

- prohibit and fight against any form of intimidation or harassment;
- ensure that the regulations in force are respected and enforced;
- develop training for employees and managers on operating procedures concerning compliance with safety rules, instructions and procedures and the use of safety equipment;
- prevent psychosocial risk situations and provide a response adapted to each situation encountered.

### **OBJECTIVE**

promote equal opportunities within the company.

### **COMMITMENTS**

- prohibit and fight against all forms of discrimination ;
- ensure that the professional development of employees is based on criteria of professional competence and aptitude without distinction of origin, sex, morals, sexual orientation, age, family situation or pregnancy, genetic characteristics, membership or non-membership, real or supposed, of an ethnic group, nation or race, political opinions, trade union or mutualist activities, religious beliefs, physical appearance, surname, state of health or any form of disability.

## 2. WITH REGARD TO **OUR COLLABORATORS**

### **OBJECTIVE**

Promote the professional development of our employees..

### **COMMITMENTS**

- encourage the development of professional skills through appropriate training programs;
- ensure an evaluation of skills and performance, and perform the professional project interviews at least once every two years ;
- encourage managers to develop a good working atmosphere, in particular through mutual respect, regular feedback, promotion of team spirit and regular information for their collaborators;
- ensure respect for private life and in particular the exercise of cultural, political, associative or religious activities insofar as they do not affect the exercise of the employee's professional activity or the reputation and image of the Group;
- encourage employees in their initiatives to sponsor skills, volunteer work or solidarity and citizenship actions;
- inform employees of the possibilities and opportunities for development within the Group by means of dedicated communication tools, giving priority, whenever possible, to internal developments.

## 2. WITH REGARD TO **OUR COLLABORATORS**

### **OBJECTIVE**

promote social dialogue and the free expression of employees.

### **COMMITMENTS**

- respect the exercise of union freedoms and promote social dialogue through the various staff representation bodies;
- prohibit any form of discrimination in connection with the exercise of a mandate as staff representative ;
- provide regular information to all employees through dedicated communication media on the life of the Group and on events that may concern them directly or indirectly, individually or collectively;
- promote the free expression of each employee's ideas, both with regard to his/her hierarchy and to his/her colleagues, in the mutual respect necessary for the expression of each person's ideas;
- allow each employee to have recourse against a managerial decision, notably through the Mediation process, which guarantees compliance with the fairness and operating rules of the company.

# 3. WITH REGARD TO **OUR INDUSTRIAL AND COMMERCIAL PARTNERS**

## **OBJECTIVE**

ensure the selection of industrial and commercial partners who can offer the necessary guarantees as to their commitment, in each of the countries where their activities take place, to respect the fundamental social rights defined, in particular, by the International Labour Organisation.

## **COMMITMENTS**

- ensure that our industrial and commercial partners undertake to respect :
  - prohibition of child and forced labour;
  - prohibition of practices that are contrary to the dignity of persons: discrimination and harassment based on sex, age, morals, real or supposed membership of a race, ethnic group or nationality, or on disability, sexual orientation, religious, political or union opinions or commitments;
  - implementation of a prevention and hygiene system to ensure safety and health in the workplace ;
  - implementation of legal provisions guaranteeing staff representation and the defense of their rights within the company;
  - compliance with regulations relating, in particular, to working conditions and legal working hours;
  - implementation of social dialogue arrangements, where they exist ;
  - compliance with the regulatory obligations in force with regard to Health and Environment.

# 3. WITH REGARD TO **OUR INDUSTRIAL AND COMMERCIAL PARTNERS**

## **OBJECTIVE**

ensure mutual respect of the principles of loyalty in all our relations with our industrial and commercial partners.

## **COMMITMENTS**

- respect and make our collaborators respect the rules relating to ;
- ensure that our partners do not engage in any anti-competitive behaviour, in particular by complying with the rules relating to :
  - competition; the prohibition of child and forced labour ;
  - the use of subcontracting, in particular those prohibiting :
    - unlawful loan of labour;
    - illegal subcontracting of labour.
- to intellectual property:

enforce industrial, intellectual or artistic property rights prohibiting the unauthorized distribution of works, documents, software and, in general, all materials protected by artistic, intellectual or industrial property rights.

# 3. WITH REGARD TO **INDUSTRIAL AND COMMERCIAL PARTNERS OBJECTIVE** **OBJECTIVE**

prevent any form of active or passive corruption in our industrial and commercial relations.

## **COMMITMENTS**

- respect and make our collaborators respect :
  - legislation prohibiting active and passive bribery, and in particular the prohibition to offer or accept any remuneration or advantage with a view to performing, delaying or omitting to perform, directly or indirectly, any act within the scope of their duties;
  - legislation on the financing of political activities;
  - the group's gifts and invitations policy, and in particular the prohibition to offer or accept any gift or invitation of other than symbolic value.
- raising awareness and training our employees to enable them to understand corruption, measure the risks and sanctions it implies, and know how to react to it, in particular through the implementation of a dedicated Anti-Corruption Code of Conduct;
- set up a system to prevent the risks of corruption and influence peddling in accordance with the French law No. 2016-1691 of 9 December 2016 on transparency, the fight against corruption and the modernization of economic life;
- ensure that our partners are committed to respecting these laws and rights towards the Group.

The governing bodies are particularly attached to the respect of this zero-tolerance policy and to the commitment of everyone, at all levels.

# 4. WITH REGARD TO ENVIRONMENT

## OBJECTIVE

Controlling the environmental footprint of our activities by :

- complying with regulatory obligations ;
- contributing to reducing the impact of our products, services and infrastructures;
- optimizing our consumption of energy and raw materials.

## COMMITMENTS

- implement a process for measuring and continuously improving our environmental performance allowing :
  - compliance with environmental regulations ;
  - the regular report of our environmental performance using indicators ;
  - the piloting of a global progress action plan.
- control the environmental impact of our products and services:
  - promote the development of the collection and recycling of mobile phones and their accessories ;
  - change the way we market and design our products and services in order to improve their environmental performance by supporting innovation;
  - ensure that our industrial and commercial partners implement appropriate actions to preserve the environment.
- controlling the environmental impact of our infrastructures ;
- ensure the recycling of electrical and electronic equipment in our facilities;
- optimize the energy consumption of our fixed and mobile network infrastructures.

# 5. WITH REGARD TO **CIVIL SOCIETY**

## **OBJECTIVE**

conceive and carrying out actions of a social and solidarity nature.

## **COMMITMENTS**

- develop privileged and trusting relationships with the public and associative world;
- develop, whenever possible, innovative solutions that allow us to adapt our product and service offerings to specific situations;
- implement operations and sponsorship actions in partnership with associations, at local and national level;
- maintain the group's territorial anchoring in order to promote economic, social and solidarity development.

# 6. WITH REGARD TO **NATIONAL AND LOCAL AUTHORITIES**

## **OBJECTIVE**

develop a constructive dialogue with the authorities and local authorities, allowing a harmonious local integration of our industrial and economic activities and taking into account their expectations of our activities.

## **COMMITMENTS**

- respect and ensure respect for the " Guide des Relations entre Opérateurs et Communes " of the Association of French Mayors and the FFT in the deployment and operation of our network equipment to enable :
  - information and consultation, with the managers of the authorities concerned and local residents, on the implementation of these equipments;
  - respect for the environment and the quality of life of local residents during installation and maintenance operations;
- contribute, within the framework of applicable regulations, to ensure that our fixed and mobile services are accessible to the greatest possible number of people, regardless of their geographical location on French territory;
- contribute to the dynamism of the territories and support local authorities in their policy of designing, financing and deploying infrastructures;
- facilitate the action of national and local authorities in any operation relating to public health or safety ;
- encourage the emergence of new digital uses that meet the challenges of the territories;
- raise awareness and train employees to understand the risks of influence peddling, to measure the risks and sanctions involved and to know how to react to them.



**The Code of Ethics and Commitments is available to all employees on the Group intranet. It is also available externally, notably on the Group's corporate website.**

**This code was updated in 2020.**

If you have any questions regarding the principles and commitments contained in this code, you may contact the Legal Department - Compliance Department