



**CONNECTIV SUPPLY CHAIN
SOLUTIONS, INC. AND SUBSIDIARIES
(COLLECTIVELY, THE “COMPANY”)**

CODE OF ETHICS

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The Company upholds the highest standards in our relations with employees, customers, suppliers, stakeholders, markets, and governments. This Code of Ethics governs the Company's business decisions and actions and displays the fundamental values we practice in our day-to-day activities. Our businesses and employees are requested to make the right decisions and take the right actions.

FAIR DEALING AND GENERAL INTEGRITY

The Company seeks to outperform its competition fairly and honestly. The Company seeks competitive advantage through superior performance and never through unethical or illegal business practices. Each director, officer, and employee is expected to deal fairly with the Company's customers, suppliers, competitors, officers, and employees.

The Company is prohibited from engaging in unfair methods of competition and unfair or deceptive acts and practices. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing.

COMPLIANCE WITH LAWS, REGULATIONS, POLICIES AND PROCEDURES

The Company is committed to complying with the laws of the states and countries in which the Group operates. This includes, for example, those relating to antitrust and promoting fair competition, preventing bribery, illicit payments and corruption, insider trading laws and labor laws and practices, preventing forced labor, child labor, human trafficking and slavery within the supply chain to name a few.

If there is any question whatsoever regarding compliance issues, you should seek advice from the Company's Legal department or the Ethics Compliance Committee (scs.ethics.reporting@vantiva.com).

In accordance with its legal obligations and in order to guide directors, officers and employees in their understanding of the standards (laws, regulations, policies and procedures) and their obligations, the Company regularly organizes training sessions on various subjects, either online or on face-to-face occasions. Attendance at these training sessions is part of every director's, officer's and employee's contractual commitment to the Company.

Participation is therefore compulsory for all and is closely monitored by management and local People and Talent partners.

COMMITMENT TO OUR CUSTOMERS

The Company exists to serve its customers. A relationship of service and trust with our customers is vital to our success as a company. We must provide quality products and services to our customers, in a continuing process. Further, we must accurately represent our products and services in all our marketing, advertising,

and sales contacts.

The Company will not tolerate disparaging our competitors, their products, or their employees and insists that we sell our products and services on their merits. If you endeavor to make comparisons between the Company's products and those of a competitor, please accurately represent the facts and do not make false or misleading statements.

RESPECT AND INCLUSION FOR ALL EMPLOYEES

The Company's policy is to provide equal employment opportunity, support, and facilitation to our employees without regard to age, race, color, religion, sex, sexual orientation, gender identity, national origin, citizenship status, different-ability, veteran status, or any other characteristic or activity protected by law, and to fully comply with all laws prohibiting discrimination, positive or negative, in all phases of employment (including, but not limited to, hiring, training, development, compensation, promotions, demotions, transfers, end of employment, use of facilities and selection for special programs). Employees shall receive equal pay for equal work and qualifications. They are entitled to reasonable accommodation for disability. Employees are also entitled to reasonable accommodation for religious practices, in accordance with the limits granted by local law.

To remain competitive in today's business climate, must actively recruit, retain, and develop the most talented candidates from a broad range of walks of life, disciplines and experience. All employees are obligated to understand and support the Company's policy with respect to equal employment opportunity, support and facilitation.

Harassment on the basis of age, race, color, religion, sex, sexual orientation, gender identity, national origin, citizenship status, different-ability, veteran status, or any other characteristic or activity protected by law is prohibited. Any employee found to be engaging in such harassing activity will be subject to the appropriate discipline which could include termination according to applicable law. Our objective is to be a responsible social actor and ensure the Company's compliance with this Code and applicable laws. All the Company personnel, suppliers, and entities along the supply chain are expected to abide by this Code or by ethical rules that are consistent with this Code, as well as with all applicable laws. facilitates workplaces where everyone can productively engage without fear of unacceptable workplace conduct.

-The Company also supports and encourages two-way communication and feedback with employees, their representatives, and other stakeholders where relevant or necessary. The process aims to obtain feedback on operational practices and conditions covered by this Code of Ethics, and to foster continuous improvement. Employees must be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.

A SAFE AND HEALTHY WORKPLACE

The Company recognizes that in addition to minimizing the incidence of work-related injuries and illnesses, a safe and healthy working environment enhances the quality of products and services, consistency of production and worker retention and morale. The Company also recognizes that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace.

As such, -the Company manages workplace safety using an occupational risk and hazard analysis approach, and where hazards cannot be eliminated or adequately controlled via the hierarchy of controls, then training and personal protective equipment are provided, including gender-responsive measures such as not having pregnant women and nursing mothers in working conditions which could be hazardous to them or their child, and to provide reasonable accommodations for nursing mothers. If employees have reasonable cause to believe that certain situations present a serious and imminent danger to their life or health, they can then exercise their right to withdraw and interrupt their activities, without fear of retaliation, until the situation has been satisfactorily corrected, controlled, or mitigated.

As the Company considers employee health and safety among its highest priorities, it will maintain procedures designed to protect the health and safety of employees, as well as to protect its property and assets. In support of this goal, personnel are required to report to work free of alcohol and controlled substances in compliance with locally applicable rules (notably our sites' internal regulations) - except for substances taken in accordance with a prescription and that do not impair the individual's ability to perform his or her duties. The use, possession, or distribution of illegal drugs (including unlawful use, possession or distribution of prescription medications) on the Company property is strictly prohibited. In addition, possession of alcoholic beverages, firearms, or other weapons on the Company property is prohibited (to the extent such prohibition is permitted by law). The consumption of alcoholic beverages may be authorized in a limited way in certain circumstances.

The Company is committed to actively protecting its employees' health by following and implementing the World Health Organization's Directives.

PROHIBITION OF CHILD AND FORCED LABOR

The Company will not permit work to be carried out by employees who do not meet the country's minimum legal age requirements and applies the same prohibitions to its suppliers. Exceptions to this rule apply to government-authorized job training or apprenticeship programs that are clearly beneficial to the persons participating.

Further, the Company strictly prohibits child labor and forced labor among its operations and its supply chain. Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported.

Workers under the age of 18 (so-called young workers) shall not perform work that is likely to jeopardize their

health or safety, including night shifts and overtime. Student workers require appropriate support and training, proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

More broadly, the Company strictly rejects human trafficking and modern slavery and performs supplier risk assessments and selected on-site audits as part of its due diligence and protective measures.

-The Company further seeks to respect, to support, and to facilitate all employees by promoting an atmosphere of inclusiveness, curiosity, and engagement. The Company recognizes that its workforce needs to mirror its customers, stakeholders, and communities, and wherever a regional imbalance is identified, the Company will seek to make improvement over time concerning any discovered imbalance by bringing support and visibility to under-represented target groups.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

In conformance with local law, the Company respects the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers shall be allowed to elect and join alternate lawful forms of worker representations.

PROTECTING THE CONFIDENTIALITY OF EMPLOYEES' PRIVATE DATA

The Company takes very seriously any obligation to comply with the requirements of the EU data protection rules, and any equivalent legislation.

RESPECT FOR CORPORATE GOVERNANCE PRINCIPLES

The Company strives to maintain the highest standards of corporate governance, with a focus on a transparency for stakeholders.

USE OF COMPANY ASSETS

The Company's assets are to be used only for legitimate business purposes of the Company and only by authorized employees, officers, or their designees. This includes both tangible and intangible assets. Intangible assets include but are not limited to: intellectual property such as trade secrets, patents, trademarks, and copyrights, business, marketing, and service plans, engineering and manufacturing ideas, designs, databases, Company records, salary information, and any unpublished financial data and reports. Unauthorized alteration, destruction, use, disclosure, or distribution of these assets violates the Company policy and this Code.

Any such action, as well as theft or waste of or carelessness in using these assets, has a direct adverse impact on the Company's operations and profitability and will result in disciplinary action, up to and including termination, according to the applicable law.

No employee or officer should make copies of, resell, or transfer (externally or internally) copyrighted publications, including software, manuals, articles, books, and databases being used in that were created by another entity and licensed to the Company. This includes copyrighted information available through the Internet. The law imposes severe penalties for unauthorized copying. Please consult the Company's Legal department prior to copying any copyrighted material.

In addition to being copyrighted, computer software programs are usually subject to license agreements. These agreements define the lawful use of the software. For example, a license may limit copying of a program. You should read and understand these agreements before you use the software. Unauthorized use or copying of software programs is prohibited. Your manager will be able to direct you to more information about software programs and the license agreements that govern their use. No employee should enter into any click-wrap Internet license for the use of a software or cloud-based service in connection with its functions nor on behalf of any Company entity, without involving the Company's Legal and Sourcing departments.

-The Company equipment, networks, and electronic systems (such as Internet access, voicemail, email, and instant messaging) are provided to help you perform your duties while supporting the Company's business needs and are for the Company business use only. -The Company equipment, networks, and electronic systems should be used only for business-related purposes. While incidental personal use is permitted on a very limited basis, there is no expectation of privacy as a result of any such personal use, including the use of -the Company assets to access social networking web sites, personal password protected email accounts to transmit any type of information (including confidential or allegedly privileged information), or any other web site. Use of the Company-owned equipment for non-Company commercial use is prohibited. Further, use of -owned equipment, networks, and electronic systems (such as Internet access, voicemail, email, and instant messaging) to view pornography or for harassment or other illegal purposes, is strictly prohibited.

Further, as set forth in detail in the Acceptable Use Policy, which is available on the intranet, all information transmitted by, received from, or stored in owned equipment, electronic systems, or networks is the property of the Company and to the extent permitted by law, you do not have any expectation of privacy in any of this information, including emails sent through your personal password protected email account on a computer or

any postings made to social networking sites. The Company may, at its sole discretion, monitor and inspect any computer using the Company's network. The Company also reserves the right to access, review, copy, or delete any message or document on its email or computer systems, including those stored on your Company-provided computers and related media, and may disclose such information to parties either inside or outside the organization as the Company deems appropriate. The Company, being a company which complies with applicable laws and regulations and this Code, will not exercise its rights referred to in this paragraph and the preceding paragraph in countries or jurisdictions where such rights are or will be unlawful (for example, some European countries have different legislation on privacy).

CORPORATE OPPORTUNITIES

Directors, officers, and employees owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises. Examples of prohibited conduct with respect to corporate opportunities include, but are not limited to:

Taking for themselves opportunities that are discovered through the use of corporate property, information, or position.

Engaging in a business opportunity with the Company through an entity in which the employee has an undisclosed interest.

Acquiring interest in real estate or an entity known by the employee, officer, or director to be of interest or benefit to the Company.

Using corporate property, information, or position for personal gain; or

Competing with the Company.

If you have any doubt concerning your obligations with respect to any opportunity that presents itself, seek advice from your manager, human resource representative, and/or the Ethics Compliance Committee.

CONFLICTS OF INTEREST

A conflict of interest exists when a person's private interests interfere in any way with the interests of the Company. The Company's policy concerning conflicts of interest is as follows:

Officers, directors, and employees must disclose to the Ethics Compliance Committee any material financial interest (typically an interest of more than 10% of a company or other economic entity) that they or their close family members may have in a competitor, supplier, or any other business that could cause divided loyalty or provide even the appearance of divided loyalty. If your professional or managerial responsibility includes working directly with information about a competitor, supplier, or other organization, you must not have any material

financial interest in any such organization. A material financial interest is one in which you would, or would be tempted to, make a decision that would not be in the best interest of the Company.

There are many types of conflict situations. Here are some examples:

Marketing products or services that compete with the Company products or services.

Working for a competitor of the Company as an employee, consultant, or member of its board of directors.

Entering into any business relationship that could reasonably be interpreted as not being in the best interest of the Company.

Possessing ownership interest in a party to a transaction when you can influence a buying or selling decision to do business with that party.

Purchasing services from a company in which you or a family member is part- owner; and

Influencing or being involved in the decision to hire friends or relatives as consultants or employees for the Company.

Conflicts are not always clear-cut. If you cannot avoid the conflict nor resolve it, you must remove yourself from the conflict situation. If you become aware of a conflict, potential conflict, or have a question as to a potential conflict, you should consult with your manager, human resources representative, and/or the Ethics Compliance Committee. If you become involved in a situation that gives rise to an actual conflict, you must inform your manager, human resources representative, or the Ethics Compliance Committee.

Not only should you disclose the potential conflict of interest as soon as it arises, you must also disclose annually any and all potential or actual conflicts of interest, [if applicable](#), in January each year by sending an email to the Ethics Compliance Committee at scs.ethics.reporting@com.

ANTITRUST LAWS

Fundamental antitrust laws prohibit business practices that restrain trade. These laws exist in the United States, European countries, and many other countries and are vigorously enforced. Their purpose is to ensure that markets for goods and services operate competitively and efficiently so that customers enjoy the benefit of open competition among their suppliers and sellers similarly benefit from competition among their purchasers. It is the Company's policy to compete fairly in the market based on its ability to promote high quality products and services at reasonable prices.

Failure to comply with antitrust laws could result in serious consequences for the Company and its personnel. Violations of antitrust laws can lead to substantial civil liability - including triple the actual economic damages to a plaintiff. Moreover, violations of the antitrust laws are often treated as criminal acts that can result in felony convictions of corporations and individuals.

Strict compliance with antitrust and competition laws around the world is essential. These laws are very complex. Some types of conduct are always illegal under the antitrust laws of many countries. Individuals must be alert to avoid even the appearance of such conduct. Below are examples of the type of conduct that likely violate the antitrust laws:

Allocating customers or dividing markets or marketing territories between or among suppliers/competitors.

Placing restrictions on production or sales.

Fixing prices for products among horizontal competitors.

Entering into agreements that unduly limit a customer's ability to sell a product or service, including setting the price at which the customer may market that product or service.

Requiring customers to purchase or provide a product or service as a condition for another product or service being made available (a "tying" arrangement).

Conducting activity to monopolize a market or reduce competition in a market, including pricing a product below cost in order to eliminate or reduce competition.

Using illegal or unethical means to gather information about competitors.

Colluding to boycott others suppliers.

Inducing disclosure of proprietary information by past or current employees of other companies; or

Bid rigging (collusive concertation, i.e. cooperation among competitors).

Verbal exchanges (regardless of when or where the communications are made) can be viewed as an agreement. Thus, you should always exercise caution whenever you meet with competitors and limit your discussions to the legitimate business purpose of the meeting. Avoid discussions with competitors related to pricing strategies, marketing, market share, projected sales for any specific product or service, revenues and expenses, production schedules, inventories, unannounced products and services, and, of course, any proprietary Company information.

Because of the complexities of antitrust and competition laws, please contact our Legal department if there are any questions regarding a specific situation. Further, any agreement that could limit competition in a specific market may be a violation of these laws and must be reviewed by the Company's legal counsel. Also, as with any suspected violation, please refer to the section below entitled "Reporting Non-compliance, Illegal or Unethical Behavior, and Protection against Retaliation."

EXTERNAL AND INTERNAL AUDITING

-The Company personnel who communicate with external auditors and internal audit staff must adhere to the guidelines set forth below:

- Be candid and forthright in all dealings with the Company’s external auditors or internal audit staff;
- Do not make false or misleading statements or fail to disclose material facts; and
- Do not take or direct any other person to take any action to fraudulently influence, coerce, manipulate, or mislead any auditor engaged in the performance of an audit of the Company’s financial statements.

If you have a disagreement or dispute with your superiors relating to the Company’s financial statements or the way transactions are recorded in the Company’s books, you should notify the Ethics Compliance Committee. Please document your understanding of the facts, issues involved, and parties with whom these matters were discussed. Also, as with any suspected violation, please refer to the section below entitled “*Reporting Non-compliance, Illegal or Unethical Behavior, and Protection against Retaliation*”.

Please note that if you are an attorney you may be subject to additional ethical and legal responsibilities with respect to reporting such matters and you should act accordingly.

DEALING WITH SUPPLIERS

All dealings and agreements with suppliers must be handled by the Company’s Sourcing Department. As set forth in other policies and the Company’s Supplier Responsibility Program and Handbook, the Company Sourcing Department will evaluate fairly all prospective suppliers and provide a competitive opportunity for all suppliers to qualify for and earn a share of the Company’s purchase volume.

As written in the Company’s Supplier Responsibility Program and Handbook, all basic concepts within this Code of Ethics apply to all suppliers, including but not limited to Ethics, Human Rights, Respect for the Environment, a Safe and Healthy Workplace, Management systems, and Responsible Sourcing, and Company screens, monitors, and performs other due diligence on its supply chain according to the Company Vigilance Plan and any other applicable requirements such as conflict-mineral mining and smelting due diligence as defined by the OECD or other relevant authority.

GIFTS, MEALS AND ENTERTAINMENT

No Company personnel should directly or indirectly seek or accept any payments, fees, services, or other gratuities regardless of the size or amount from any person, company, or organization which does or seeks to do business with the Company. Gifts of cash or cash equivalents of any amount are strictly prohibited. Similarly, the

Company personnel shall not offer any payments, fees, services, or other gratuities regardless of their size or amount, to any company or organization with whom the Company does or seeks to do business.

As the only exceptions to this rule, gifts, meals, or entertainment may be given or received only if:

- They are ordinary, reasonable, and of nominal value.
- They do not violate any law or generally accepted ethical standards, including the standards of the recipient's or giver's organization; and
- They are consistent with accepted business practices.

The Company employees are to courteously decline or return any kind of gift, favor, or offer of excessive entertainment which violates the Company's guidelines, and inform the offerer of the Company's policy. In countries where local custom is so strong that to refuse to accept a gift or not to reciprocate with a gift would be considered an insult, you may give and receive gifts consistent with the above guidelines only after you have sought approval from your manager.

ANTI-CORRUPTION AND ANTI-BRIBERY

No Company directors, officers, employees and business partners should ever engage in bribery or any other form of corruption. Accordingly, the prohibitions and requirements of the [Anticorruption Policy.pdf](#), complete with a Compliance Manual, are designed not merely to comply with the U.S. Foreign Corrupt Practices Act, French Criminal Code and any applicable Anti-corruption laws, but also to avoid the appearance of questionable conduct in connection with operations.

Strict compliance with the Company's [Anticorruption Policy.pdf](#) is required of all Company personnel and failure to comply can result in fines, penalties, and criminal liability against and the individual committing the violation. If you have any questions about how to treat third parties (private parties or government employees), you should consult with the Company's Legal department or the Ethics Compliance Committee (scs.ethics.reporting@vantiva.com).

ANTI-HUMAN TRAFFICKING AND MODERN SLAVERY IN THE SUPPLY CHAIN

The Company requires direct suppliers to comply with the Company policies against forced labor, child labor, human trafficking and slavery within the supply chain. Such topics of concern are included in the Company's Supplier Ethics auditing program.

The Company maintains internal accountability for employees or contractors to meet company standards

regarding slavery and human trafficking. The Company requires its employees dealing with suppliers to report any suspected or detected violation among the operations and the supply chain and it allows reporting by other employees through the whistle blowing procedure.

ANTI-MONEY LAUNDERING

Money laundering is “any act or attempted act to conceal or disguise the identity of illegally obtained proceeds so that they appear to have originated from legitimate sources” (Interpol definition). The Company conducts its business in compliance with applicable anti- money laundering laws. Please contact the Company’s Legal department or the Ethics Compliance Committee if you have any questions regarding a specific situation.

POLITICAL CONTRIBUTIONS

The Company does not use its resources to support political parties or candidates. Therefore, any exceptions to this rule of prohibition, in circumstances where it would be clearly legal to do so, would require specific approval by the Ethics Compliance Committee. The Company personnel, of course, may support parties and candidates as long as they do so on their time and do not use Company resources.

GOVERNMENT INVESTIGATIONS

If the Company becomes involved in a government investigation regarding its operations, employees, customers, or suppliers, we will cooperate. As soon as you become aware of a government investigation, you must promptly notify the Company’s Legal department. The Company will not alter or destroy any documents, not only the Company documents, in anticipation of government investigation, which includes computer records and emails. The Company will not provide false or misleading information to any government investigator, nor attempt to cause another person to provide false or misleading information.

RESPECT FOR THE ENVIRONMENT

Climate change remains one of the world’s most pressing sustainability challenges and the Company is committed to environmentally responsible business practices. The Company understands that consistent standards help each site meet local requirements. Standards also provide a base to encourage people at each location to go beyond local regulatory requirements. The Company tracks a wide range of environmental data at dozens of sites worldwide, including waste management (total waste generated, landfilled and recycled), energy consumption (electricity and fossil fuels), water consumption, air emissions (greenhouse gas emissions), and processing wastewater effluents.

The Company has established, and continues to report about, its absolute greenhouse gas emissions and their reduction via the Science-Based Targets initiative. Energy consumption and all Scopes 1, 2, and significant

categories of Scope 3 greenhouse gas emissions must be tracked, documented, and publicly reported on an annual basis.

SOCIAL MEDIA

As detailed in the Social Media Responsible Use Policy, blogging, tweeting and other online dialogue are far-reaching forms of communication. Information purported to be published by the Company contained within Social Media websites could have a negative impact to the Company and our stakeholders, with potential legal implications.

Unless you have been certified as an Official Social Media Content Contributor by the Company and expressly authorized to speak on behalf of the company via Social Media, you must not claim, purport to be or in any way imply that you are speaking on behalf of the Company or expressing an official company position in such communications. We encourage you to share any the Company public information with your personal and/or professional contacts as long as you do not modify or alter the original message. However, you must not comment on the Company public information, including products, services, or organizational information without expressly identifying yourself as a Company employee. Please consult the Social Media Responsible Use Policy.

PUBLIC COMMUNICATIONS

Only designated Company corporate communications individuals are permitted to make or respond to a news media contact. Failure to observe this simple policy can cause tremendous damage to the Company and spread misinformation. If a reporter asks you a question, explain that it is the Company's policy to respond to media inquiries through its corporate communications and financial communications staff, and refer that reporter to the appropriate the Company corporate communications or investor relations manager, who can be identified on the intranet.

RESPECT FOR THE INTELLECTUAL PROPERTY OF OTHERS

The Company respects the intellectual property of others and never intentionally infringes the valid patent rights of others or violates valid trademark rights of others in any jurisdiction anywhere in the world. When you learn of an adverse patent or trademark, please immediately notify the Company's Legal departments. Once aware of an adverse patent or trademark, the Company will conduct the appropriate investigation and take any necessary steps as determined by the Legal department and the relevant business unit to avoid, cease, or ameliorate the impact of any adverse valid patent or trademark.

Finally, as detailed in the Information Protection Policy and Significant Business Incident SBI Policy the Company strives to prevent piracy and protect its assets as well as those entrusted to it by third parties. Those policies are designed to prevent pirating images or other content provided by our customers. Please consult these policies for more detailed information on this topic.

PROTECTING CONFIDENTIAL INFORMATION

The Company's information and business data—and the security of that information and data—are crucial to our success. The Company must safeguard confidential information against improper disclosure, both inside and outside the Company. The Company information (or information that the Company maintains on behalf of its customers, suppliers, agents, or other representatives) that has not been publicly disclosed should be treated as confidential. Such information, whether verbal, written, or stored on electronic media, includes non-public information on products, services, methods, systems, internal reports, analyses, production and sales statistics, financial data, business plans, and marketing methods and strategies.

As an employee of the Company, your obligation to protect confidential information is effective while you are employed by the Company and after your employment ends. In other words, even if you retire or leave the Company, you may not disclose the Company's confidential information or use it in any manner. In addition, if you received confidential information or trade secrets from a previous employer, you have an obligation to avoid disclosing it to the Company or Company personnel. By using or revealing such information, you place the Company and yourself at legal risk. You do have a right to use general skills and knowledge acquired with previous employers in your job at the Company and to take general skills and knowledge with you when your employment with the Company ends.

CONFIDENTIAL INFORMATION FROM OTHERS

It is not uncommon for the Company to receive confidential information for a variety of legitimate business reasons. We must take great care in handling information that has been entrusted to us by others. In the event receives confidential non- public information, there should be a written agreement defining the Company's obligations for the use and protection of the information. This agreement should be reviewed by the Company's Legal department.

Once the information is entrusted to the Company, you must protect its confidentiality and limit your use of it to what is authorized by the agreement. You also are responsible for making sure that the Company personnel or departments who are not authorized do not have access to confidential information.

The Company will not tolerate acquiring confidential information about other companies unless acquired through proper means. You may not engage in industrial espionage or acquire information about other companies through improper means. Examples of improper means are:

- Persuading present or former employees of another company to divulge confidential information; and

- Receiving information that was illegally or improperly acquired by another party.

If you come into possession of information from another company marked confidential or you believe the information is confidential and it is not governed by a written agreement or have questions about our right to

receive it, you should immediately contact the Company's Legal department or the Ethics Compliance Committee. Please see the Information Protection Policy for more detailed information on classifying and protecting confidential information from others.

CREATION OF INTELLECTUAL PROPERTY

As an employee of the Company, you have assigned to the Company the right to any ideas and inventions you develop if they are capable of being used in an area of the Company's business. Computer software and publications are covered by this Policy, and it may also apply to software and inventions developed at home on personally owned equipment. However, inventions that are not developed for the Company, that are not within the Company's area of business, and are not developed with the use of the Company resources may be excluded. If you believe your invention falls outside the Company's business interests, you can ask the Company for a written release of any claim or right it may have to the invention.

RECORDS RETENTION

Records are a vital part of maintaining a high level of ethical business transactions. The Record Retention Policy is available on the intranet, establishes a retention period for each record type consistent with laws, rules, and regulations in the United States, France and other countries. Failure to comply with this Policy may have severe consequences for the Company and its personnel, agents, and contractors. After the record has reached its retention period, unless it is subject to a Hold Alert, it must be destroyed.

All business and accounting transactions must be fully and accurately described in the Company's records, and payments on the Company's behalf should never be made other than as described in the records. At the Company, there is never any reason for false or misleading entries and there is no place for undisclosed or unrecorded funds, payments, or receipts.

REPORTING NON-COMPLIANCE, ILLEGAL OR UNETHICAL BEHAVIOR, AND PROTECTION AGAINST RETALIATION

The Company will not tolerate retaliation against anyone who has made good faith reports or complaints of violations of this Code. Employees should, only in good faith, bring to the Company's attention suspected financial, accounting, banking, antitrust and anti-bribery violations, suspected hygiene, health and safety and environment protection violations (including in the supply chain), and suspected discrimination and harassment at work that may constitute a violation of this Code or any applicable law.

Information regarding suspected violations should be given to the Ethics Compliance Committee at the address below.

While requests that you disclose your identity when reporting a suspected violation, you may submit a report anonymously. The identity of the individual reporting, as well as the report itself, will be kept confidential to the fullest extent possible, consistent with the need to conduct an adequate investigation:

You may contact the Ethics Compliance Committee via email at scs.ethics.reporting@.com, or submit written reports to:

Ethics Compliance Committee
5215 Lamar Ave., Memphis, TN 38107

If you are in Australia, Belgium, Canada, France, India, Mexico, Poland, United Kingdom, or the United States and wish to submit a report on any of these countries, you may also submit a report through EthicsPoint. EthicsPoint's local toll-free telephony and web-based hotline solution enables employees to easily and confidentially report alleged violations of this Code. It is an independent third party that specializes in providing the tools and information necessary to receive, investigate, analyze and resolve such reports.

Upon receipt, as detailed in the Charter available on the intranet, the Ethics Compliance Committee will promptly investigate each and every report, and will take appropriate action if a violation is found, up to and including termination and criminal charges, according to applicable law. All involved are expected to cooperate with internal investigations of alleged misconduct. Any good faith communication of violations will be kept confidential to the extent practicable.

Allegations of such behavior are not taken lightly and should not be made to embarrass someone or put her or him in a false light. Reports of suspected violations should always be made in good faith. For additional information, please consult the Company Whistleblower Policy available on the intranet.

QUESTIONS OR CONCERNS

If you have any questions or concerns regarding any ethical issue, please contact the Ethics Compliance Committee (scs.ethics.reporting@.com) or legal department.