



## Employee Code of Conduct Policy

### Policy brief & purpose

PLACE's Employee Code of Conduct company policy outlines our expectations regarding employees' behavior towards their colleagues, supervisors and overall organization.

We promote freedom of expression and open communication. But we expect all employees to follow our code of conduct. They should avoid offending, participating in serious disputes and disrupting our workplace. We also expect them to foster a well-organized, respectful and collaborative environment.

### Scope

This policy applies to all our employees regardless of employment agreement or rank.

### Policy elements

#### What are the components of an Employee Code of Conduct Policy?

Company employees are bound by their contract to follow our Employee Code of Conduct while performing their duties. We outline the components of our Code of Conduct below:

#### Compliance with law

All employees must protect our company's legality. They should comply with all environmental, safety and fair dealing laws. We expect employees to be ethical and responsible



when dealing with our company's finances, products, partnerships and public image.

**Respect in the workplace**

All employees should respect their colleagues. We won't allow any kind of discriminatory behavior, harassment or victimization. Employees should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

**Protection of Company Property**

All employees should treat our company's property, whether material or intangible, with respect and care.

Employees:

- Shouldn't misuse company equipment or use it frivolously.
- Should respect all kinds of incorporeal property. This includes trademarks, copyright and other property (information, reports etc.) Employees should use them only to complete their job duties.

Employees should protect company facilities and other material property (e.g. company computers) from damage and vandalism, whenever possible.



### **Professionalism**

All employees must show integrity and professionalism in the workplace:

- Personal appearance

All employees must follow our dress code and personal appearance guidelines.

- Corruption

We discourage employees from accepting gifts from clients or partners. We prohibit bribery for the benefit of any external or internal party.

- Job duties and authority

All employees should fulfill their job duties with integrity and respect toward customers, stakeholders and the community. Supervisors and managers mustn't abuse their authority. We expect them to delegate duties to their team members taking into account their competences and workload. Likewise, we expect team members to follow team leaders' instructions and complete their duties with skill and in a timely manner.

We encourage mentoring throughout our company.

- Absenteeism and tardiness

Employees should follow their schedules. We can make exceptions for occasions that prevent employees from



following standard working hours or days. But, generally, we expect employees to be punctual when coming to and leaving from work.

- Conflict of interest

We expect employees to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties.

- Collaboration

Employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.

- Communication

All employees must be open for communication with their colleagues, supervisors or team members.

- Benefits

We expect employees to not abuse their employment benefits. This can refer to time off, insurance, facilities, subscriptions or other benefits our company offers.

- Policies

All employees should read and follow our company policies. If they have any questions, they should ask their managers or Human Resources (HR) department.



## Disciplinary actions

Our company may have to take disciplinary action against employees who repeatedly or intentionally fail to follow our code of conduct. Disciplinary actions will vary depending on the violation.

Possible consequences include:

- Demotion.
- Reprimand.
- Suspension or termination for more serious offences.
- Detraction of benefits for a definite or indefinite time.

We may take legal action in cases of corruption, theft, embezzlement or other unlawful behaviour.

---

Paris, September 14th 2022

Michele Caleffi  
CFO and Legal Representative.

A handwritten signature in black ink, appearing to read 'Michele Caleffi'.

