

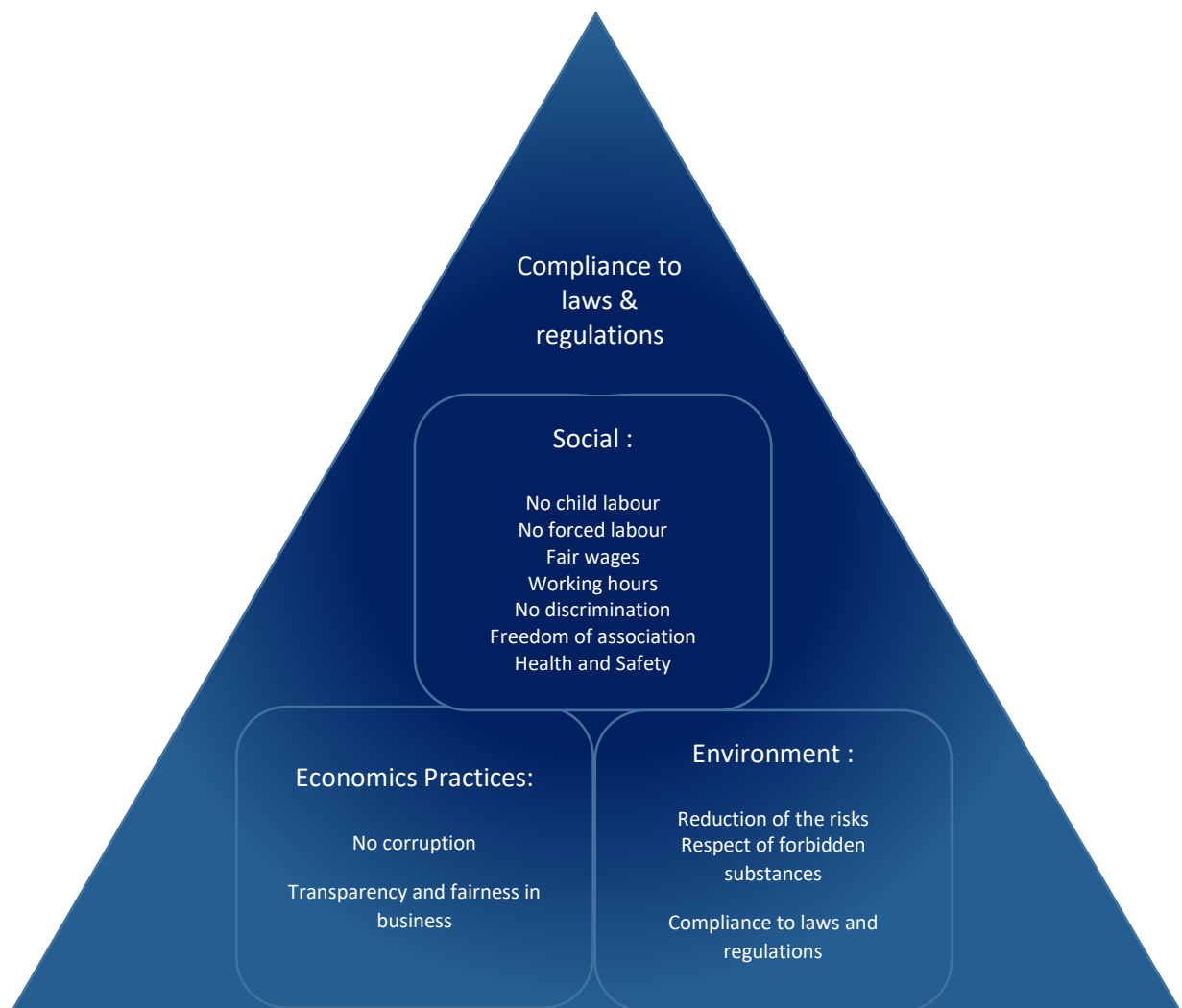
# C O D E O F C O N D U C T

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The STEVA Group's ethics charter requires all the group's units, its employees as well as its partners working with or acting for STEVA's group, to meet all the demands of this charter. It includes the respect of the applicable laws and three main aspects:

- Social and labour policies
- Environment
- Economics practices

The observance of the ethics charter's requirements as described below plays a major role in the choice of our suppliers and partners.



- 1- **Compliance to the current laws and regulations** in the countries where the productions are made by or on behalf of the group. When the local regulations are less restrictive than the international laws and regulations, the necessary must be done to converge on these ones.
- 2- **Child labour prohibited**: compliance to ILO measures (international labour organization-ILO Convention N° 138.182)
- 3- **Forced labour prohibited**: recruiting or employing people against their willingness under menace is prohibited. Hard labour may include practices such as people's movements restrictions, salary suspension or retention of their identify documents, in order to force them to stay at work, deprivation of food, home or any other necessities ; the application of forced overtime; or loss of social status (See ILO Convention N° 29,105)
- 4- **Working hours**: working hours (including overtime), as well as break times and Holiday must comply with applicable laws and regulations, collective agreements and international Conventions.
- 5- **Fair wages**: wages must meet all the applicable laws and regulations including those relating to Minimum wage, extra hours and legally mandated benefits
- 6- **Non-Discrimination and Equal Remuneration**: no discrimination against any worker based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, social origin, or marital status in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline, termination and retirement (see ILO Convention n° 100, 111).
- 7- **Freedom of association**: respect of workers right to freely associate, to join any worker's federation of their own choice, to be represented and, to bargain collectively, according to the applicable laws and regulations. The representatives of such personnel are not subject to discrimination and may join other members during their work. They must have an appropriate workspace to work effectively and without interference (See ILO Conventions N° 98, 87)
- 8- **Health and Safety**: Each site must ensure the minimum health and safety risks to its employees and external contractors, in order, as a minimum, to meet the current laws and regulations and to tend to comply with OHSAS 18001 standard. Each site must undertake to achieve the 0 accidents and requires the same to its suppliers.
- 9- **Environment**: Each site must ensure the reduction (as much as possible) of the environmental risks resulting from its business with at minimum the compliance with the current laws and regulations and to tend to comply with ISO 14001 standards. The compliance with European regulations REACH (or similar national or international ones) is mandatory. The use of conflict minerals is prohibited.

- 10- **No corruption:** Every kind of bribery, extortion and advantages must be fought and this, in compliance with every applicable relevant laws. Sites and suppliers commit themselves not to offer, receive promise, give, require or accept any illicit payment or any other advantage with intent to get or keep a business or any other advantage.
- 11- **Transparency and Fairness in business:** Observance of applicable laws and regulations relative to fair competition. A Customer/supplier partnership is essential with, if necessary, the supplier's commitment to tell about their financial Health, their trade activities and their development. Sites and suppliers commit themselves not to take part in, to affect or to try to affect any decision which could lead to a real or perceived conflict of interest.

**Commitment to comply with the present STEVA ethics charter**

Date : ..... Place: .....

Company Name: .....

Address: .....

Signatory: .....

Position: .....

Signature: