

ETHICS CHARTER

JANUARY 22TH, 2018



HighCo

CONTENTS

➤ OUR ETHICAL PRINCIPLES

➤ OUR RESPONSIBILITY TO OUR PARTNERS

1. Government authorities
2. Employees
3. Clients
4. Suppliers
5. Competitors
6. Shareholders
7. Consumers

➤ WHO IS THIS CHARTER FOR AND HOW IS IT APPLIED?

1. Who is this Charter for?
2. How is this Charter distributed?
3. What to do in case of violation

OUR ETHICAL PRINCIPLES

Leading by example and respect are the HighCo Group's core values.

The Ethics Charter is based on these values, which are applied through principles that must be respected by the Group and all of its employees.

Abiding by laws

We abide by the laws and regulations in any area and every country where we operate.

Honesty and integrity

We shall act with honesty and contribute to promoting a culture of integrity.

Integrity notably means that any form of corruption, active or passive, is forbidden.

As such, we shall not accept or offer any unofficial payment, either directly or indirectly and we will comply with the Anti-Corruption Code of Conduct of the Group, - in particular with respect to gifts and invitations -, available at www.highco.com and on the corporate social network <https://highconnect.highco.com/>

OUR ETHICAL PRINCIPLES

Protecting Group interests

Under any circumstances, our behaviour shall be loyal and inspired by the Group's interest.

We shall avoid any situation or activity that could lead to conflicts of interest with the Group. If circumstances give rise to a potential or actual conflict of interest, the employees concerned must report this.

Conflicts of interest arise from any situation in which employees' personal interests conflict with their duties or responsibilities in the Group.

Everyone is responsible for protecting the Group's property and resources which are provided to them and for using them strictly for their intended purpose.

We shall treat any non-public information concerning the businesses of the Group and its clients with full confidentiality.

Any use of such information for personal gain or that of others, notably to buy or sell HighCo shares or those of its clients, is proscribed.

We shall not, for personal gain, engage in any business, either directly or indirectly, that is in competition with that of the Group.

Transparency and relevance of information

We shall lead by example in the accuracy and relevance of the information provided for our partners.

Respecting the environment

Our internal operating and purchasing practices shall be guided by our respect for the environment and the aim of reducing our environmental impacts. Everyone shall contribute to this goal within the scope of their functions.

OUR RESPONSIBILITY TO OUR PARTNERS

The Group is aware of its responsibility to all stakeholders who contribute to its success, in particular the following Partners:

1. Government authorities

We must have flawless relations with the authorities and, in particular, apply the regulations that pertain to lobbying.

No contribution of any kind shall be given to political parties, officials or interest groups without the prior written approval from HighCo's Management Board.

2. Employees

In addition to respecting the principles that govern human rights and labour rights, the Group shall provide its employees with dignified working conditions.

Everyone shall ensure that their behaviour does not impair the quality of the working environment of their colleagues.

The Group rejects any form of discrimination, harassment, intimidation or any humiliating behaviour or remarks.

OUR RESPONSIBILITY TO OUR PARTNERS

3. Clients

The Group shall act in the interest of its clients, be guided by a concern for quality and show professionalism, involvement, attention, creativity and relevance in providing its services.

Relations with clients must be founded on integrity, loyalty and mutual trust.

In relation with clients, employees must comply with the Anti-Corruption Code of Conduct enacted by HighCo. In particular, it is prohibited to pay unofficial fees or any other form of illegal payment, either directly or indirectly, to any person representing a client or prospect in order to win a bid. We must strictly respect the confidentiality of the data provided to us by our clients or prospects.

4. Suppliers

Our choice of suppliers must be based on criteria of performance, quality, price competitiveness and time frames, as well as environmental, social and human rights criteria.

Group requires its suppliers to share its ethical rules and principles, in particular on areas concerning the environment, social issues, human rights, forced labour and child labour, and the fight against corruption.

Group employees must comply with all local laws and regulations in all relations with suppliers, and also with the Anti-Corruption Code of Conduct enacted by HighCo.

OUR RESPONSIBILITY TO OUR PARTNERS

5. Competitors

The Group believes in free competition.

All employees shall have loyal business practices and strictly obey competition laws in all countries where the Group operates.

6. Shareholders

The Group shall aim for the best performance possible vis à vis its shareholders.

HighCo applies responsible corporate governance principles favouring the transparency of its management and executives.

It shall provide its shareholders and financial markets with information that fairly and accurately reflects its position and in a timely manner.

7. Consumers

As a communication group, HighCo is accountable to its consumers, who are the direct or indirect targets of its communication initiatives.

It must provide them with honest, ethical and responsible information that respects the country's culture.

WHO IS THIS CHARTER FOR AND HOW IS IT APPLIED?

Who is this Charter for?

The Ethics Charter applies to all Group subsidiaries in which HighCo holds directly or indirectly at least 50% of the share capital.

How is this Charter distributed?

This Charter has been distributed throughout all Group subsidiaries.

It is given to each new employee as part of the welcome procedures.

It is available on the corporate social network <https://highconnect.highco.com/>.

What to do in case of violation

If an employee identify himself/herself a crime or offence a clear, serious infringement of laws or a serious threat or harm to public interest or the existence of conduct or situations that contravene the Anti-Corruption Code of Conduct, where these are likely to involve incidents of corruption or influence peddling, he or she invited to make a report in compliance with the whistleblowing and reporting system available for consultation on the corporate social network <https://highconnect.highco.com/>. It can also be requested from the Group's HR and Legal departments.