



epsa   
improve YOUR EFFICIENCY

ETHICAL CHARTER





## **EPSA GROUP IS DRIVEN BY THE CONVICTION THAT TOMORROW'S COMPANY WILL BE RESPONSIBLE.**

**Today, this ambition leads us to build a group with high human added value. This collective project is for us a means of transformation, a source of performance and sustainable growth.**

Societal and environmental issues are redefining the place of business in society. Its role is ultimately no longer just to generate profit, but to do so by having a positive impact on the world. In this context, medium-sized companies must be part of this incredible transformation.

To ensure that our values are shared and respected, EPSA Group has established this ethical charter to sustain its commitment to Societal and Environmental Responsibility. This charter is therefore a guide for all the teams of EPSA Group, who have an obligation not only to respect the principles defined in this document, but also to contribute to their evolution.

This charter goes far beyond mere compliance with the law, the basis of each company. It is therefore intended to provide a framework that will enable EPSA Group to pursue its economic and societal objectives by taking into account, on a daily basis, all its stakeholders and the impact associated with their decisions.

Because this ethical charter and the approach it develops are not just words, the Management is the guarantor of its proper application and can be asked at any time to answer questions from all members of EPSA Group.

It is a fundamental foundation of our company, which must guide us and help us make the right decisions; if we are not sure about the moral and ethical principles that underlie our various professions... it should act as a single guiding light.

**Matthieu GUFFLET**  
Founder and President of EPSA Group



## RESPONSIBLE GOVERNANCE

The EPSA Group is growing rapidly and must therefore take into account its social and environmental footprints in order to put them in synergy with its economic footprint.

**Controlling this, and linking these footprints, has led us to set up a solid organisation covering our societal responsibility, driven by the leadership and top management of the EPSA Group.**

To ensure that this ambition is properly implemented, the governance of the EPSA Group complies with several main principles and, in particular, respect for Human Rights.

The EPSA Group is a signatory to the United Nations Global Compact and therefore supports the ten principles, including respect for human rights. The EPSA Group also promotes this, particularly in its sphere of influence.

For the EPSA Group, respecting human rights means being vigilant in identifying the potential direct or indirect negative impacts of its organisation in order to correct them.

The EPSA Group therefore continuously monitors its activity so as not to be directly or indirectly involved in any human rights violation that may be committed by another company, government, individual, group or any other entity with which it collaborates.

Also, through its international presence, the EPSA Group respects communities and seeks to respect local cultures.



## ETHICAL BUSINESS CONDUCT

The EPSA Group has established various documents to ensure its long-term involvement in matters of Social and Environmental Responsibility and in particular:

- An CSR charter
- An anti-corruption policy
- A responsible purchasing charter
- A booklet «EPSA, a responsible Group»
- This ethical charter

These documents are a guide for all the teams of the EPSA Group who have the obligation not only to respect the principles, but also to control their evolution.

These documents go far beyond mere compliance with the law, the basis of every society. They are intended to provide a framework that allows the EPSA Group to pursue its economic and societal objectives by taking into account, on a daily basis, all its stakeholders and the impact associated with their decisions.



## A GROUP WITH **STRONG HUMAN ADDED VALUE**



### **RESPECT FOR HUMAN RIGHTS**

EPSA Group's main resource is its staff, everywhere throughout the world. EPSA Group is fully committed to respecting human rights and to promoting them throughout its sphere of influence.

For EPSA Group, respect for human rights means being vigilant in identifying potential negative direct or indirect impacts of its organisation in order to correct them. EPSA Group continuously seeks not to be involved, directly or indirectly, in any breach of human rights committed by another company, government, individual, group or any other entity it works with.

Finally, through its international establishment, EPSA Group respects communities and seeks to respect local cultures. It is a common thread in the whole conduct of EPSA Group's business.



### **RESPECT, PROTECTION, INTERNAL DIALOGUE, INTEGRITY AND ENABLING EMPLOYEES TO REACH THEIR FULL POTENTIAL**

#### **1 • RESPECT AND PROTECTION**

Respect for the employee is a fundamental objective of EPSA Group: Everyone must contribute to the cohesion of the company through the implementation of quality professional relations, both hierarchical and functional, i.e. frank, loyal and respectful of all.

From this perspective, EPSA Group is committed:

- To non-discrimination, for any reason whatsoever, in labour relations, and in particular not to discriminate on the basis of sex or age, racial, social, cultural or national origins, trade union activities, sexual preferences, disability, political or religious opinions, as well as to recruit and promote its staff according to their own qualities and to treat them with dignity, without favouritism and with respect for their privacy
- To take the necessary measures to ensure that working conditions preserve the health and safety of employees. Every employee of EPSA Group has the right to a working environment that ensures his/her health and safety, whether it be physical, mental or social well-being. Special attention is paid to any form of harassment, intimidation or victimisation, whether physical, psychological or sexual in nature
- To comply with laws and regulations concerning the protection of personal data of employees.

#### **2 • INTERNAL DIALOGUE**

Freedom of expression is a fundamental right guaranteed within EPSA Group.

The opinions of all on the rules of conduct within the company is sought, especially through the personnel representative when elected.

It is from this point of view that EPSA Group relies on dialogue and openness within the company. Respecting the right of its employees to form or join any representative organisation of their choice (trade unions or workers' organizations...), EPSA Group intends to facilitate the organization of participation in collective bargaining and undertakes to negotiate with them on matters of collective interest.

### 3 • INTEGRITY

EPSA Group pays close attention to the integrity of its employees and reciprocally, EPSA Group's employees shall refrain from harming the reputation of EPSA Group, the integrity of its assets and its information systems.

Thus, if an employee is allowed to have a paid activity of any type outside his/her employment, such activity must be free from conflicts of interest with the functions carried out in EPSA Group.

Similarly, investments, either direct or through an intermediary, in companies with business relationships with EPSA Group must be treated with the greatest caution. Such restrictions do not apply to listed companies, except for the use of privileged information that constitutes insider trading.

In addition, EPSA Group's Anti-corruption policy defines the rules applicable to gifts and advantages.

### 4 • ENABLING EMPLOYEES TO REACH THEIR FULL POTENTIAL

EPSA Group is aware that the development of its employees is an asset for sustainable performance and growth. EPSA Group has therefore set up a "quality of work life" policy. As an example, each employee has a right to training for greater employability and development at work. EPSA Group seeks to develop the skills of its employees at all stages of their careers through proactive training and learning policies. The training needs of each employee are discussed each year during the individual interview.

EPSA Group is also committed to proposing conditions for a balance between work and private life. EPSA Group therefore promotes dialogue and listening between employees and their supervisors in order to best organise the work according to the obligations and expectations of each other.



### OBLIGATIONS REQUIRED OF EMPLOYEES

Employees of EPSA Group are required to comply with the laws in force in all the countries in which it operates.

Knowledge and understanding of these laws can sometimes be difficult in cultural and legal environments very different from those in which staff have worked so far.

In case of questions, employees must immediately contact their line managers or the legal department. Employees of EPSA Group who work in a foreign company must comply with the laws of the country of the joint subsidiary, the countries in which it operates and those of the country or countries of its shareholders.

In addition, employees of EPSA Group must make every effort to ensure full confidentiality of the information they may hold. EPSA Group's employees may be required to hold information belonging to EPSA Group or its clients which must remain confidential because its disclosure or release could be harmful to the interests of EPSA Group or its clients.

This information may include persons, services, missions, studies, technical projects, contractual data, business and financial plans, social data, and any elements that may be relevant to intellectual property and know-how, including clients of EPSA Group.

It is up to everyone to ensure that this information is not disseminated outside the enterprise, nor even communicated to employees of service companies who are required to execute a service contract for EPSA Group.



## THE GROUP, ITS CLIENTS AND SUPPLIERS



### BEHAVIOUR WITH REGARD TO CLIENTS

Each employee of EPSA Group must respect the principles of loyalty and integrity in relation to clients. Given the nature of the services provided by EPSA Group, no compromise is acceptable in the field of security. Any situation where a member of the personnel may have questions must be immediately submitted to their line manager.

To anticipate these situations, EPSA Group and its employees undertake:

- To respect all technical and environmental rules, processes and requirements that contribute to the performance and quality of the services of EPSA Group;
- To only provide clients with sincere information about the offer and characteristics of the products and services delivered;
- To respect the commitments made by EPSA Group to its clients concerning the confidentiality of the data received from them and processed on their behalf;
- To take all measures to deliver non-counterfeit products to clients;
- To transparently record any non-compliance in order to initiate actions to enable resolution and the analyses that will lead to corrective action;
- To comply with laws and regulations concerning the protection of personal data of clients and/or prospects.



### BEHAVIOUR WITH REGARD TO SUPPLIERS

EPSA Group's «Responsible procurement charter» forms an integral part of the procurement and contractual procedures required from EPSA Group's suppliers. It undertakes to consider the societal and environmental impacts of purchases of goods or services, both in the selection phase of the supplier or subcontractor, in the contracting or in the execution of the service.

This Charter describes the social, environmental and societal commitments that EPSA Group asks its suppliers to respect. Compliance with the principles of this Charter is therefore essential to the continuity of relations between EPSA Group and its suppliers.

Finally, EPSA Group undertakes, to the extent possible, to develop its purchases within the protected sector (disability-friendly companies and sheltered employment institutions), from "SIAE" (organisations for social inclusion through economic activity), and from any other suppliers or subcontractors with positive impact.



## THE GROUP AND THE FIGHT AGAINST CORRUPTION

EPSA Group is aware that corruption carries commercial, reputation and credibility risks and may consequently destabilise the internal organisation. EPSA Group is committed, in all the countries where it operates, to fighting all forms of corruption. Beyond respect for the laws, EPSA Group implements a compliance programme based on applicable provisions (e.g. in France: law on transparency, anti-corruption and modernisation of economic life, known as "Sapin II").

This programme includes an Anti-corruption policy (ACP), which is brought to the attention of employees and serves as a guide to ethical business practice. This policy defines the applicable rules in terms of gifts and advantages.



## PROTECTION AND ENHANCEMENT OF THE IMAGE OF EPSA GROUP

The quality of EPSA Group's institutional image and the reputation of its services are the conditions for its sustainability. The employees of EPSA Group, aware of its importance, must contribute to the positive reputation of EPSA Group and must refrain from any denigration, initiating or supporting any boycott, negative communication, institutional campaigns or any adverse action, of any kind, including when using public social media.

No outside communication may be made by an unauthorised person. Any communication must be subject to prior validation by the line manager who must inform the relevant departments.

### À PROPOS DE NOTRE GROUPE

Le Groupe EPSA est l'un des leaders Européen du conseil en organisation et en performance opérationnelle. Le Groupe EPSA accompagne plus de 600 clients dont 36 entreprises du CAC 40, avec des expertises fortes dans le domaine des achats, de l'optimisation des charges sociales et fiscales, du financement de l'innovation et du BPO (centrale d'achat). La force du Groupe EPSA provient notamment de la qualité de ses experts et de la puissance de ses solutions technologiques.

Notre promesse : identifier & exploiter des gisements de performance afin d'améliorer la rentabilité de votre entreprise.

Aujourd'hui, le Groupe EPSA relève un nouveau défi en insérant des solutions RSE au sein de chacune de ses expertises afin de toujours proposer une offre qui soit adaptée aux enjeux d'aujourd'hui et d'anticiper ceux de demain.

Pour en savoir plus :  
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