2 – CODE OF ETHICS

Promod as a family owned French-based company, attaches a great importance to the respect of legislation, notably in the fields of labour laws and environment.

This is why Promod has set up a Code of Ethics which has to be shared and signed by each of its suppliers.

This code of Ethics lists the requirements defined by the International Labour Organization which have to be respected by each of Promod suppliers in the following fields:

- Child Labour forbidden
- Forced Labour forbidden
- Respect of Health & Safety conditions
- Respect of Environment
- Limitation of Working hours
- Compliance with wages legal standards
- Subcontracting to a non-authorized supplier forbidden
- Freedom of association of employees
- Non-discrimination
- Compliance with the labour law regulations

Considered as real partners, Promod suppliers are expected to adhere to this code of ethics. They have to play a role of example in their country's setting up.

Independent companies will conduct frequent and sudden audits to ensure that this code of ethics is respected.

Child labour:

Promod will not tolerate the employment of child labour whatever the form.

Child Labour is defined as a worker under the age of 15 (or 14 years old in the countries of production where it is authorized by the law) or younger than the compulsory age for school attendance.

Forced labour / disciplinary practices :

Promod suppliers and subcontractors will not use forced labour and will not tolerate the use of forced labour whatever the form.

"Forced Labour" is defined as work or services which is required from any person under the threat of penalty for its non-performance and for which the worker does not offer himself voluntarily.

As a result, any form of disciplinary practice (physical or mental coercion or punishment) shall not be used against workers.

Hygiene, health and safety

Promod suppliers and subcontractors will be in compliance with all applicable laws and regulations related to hygiene, health and safety in the country of production.

They will ensure that employees are not subject to unsanitary or hazardous conditions.

Environment

Promod suppliers and subcontractors will adhere to all applicable environmental laws in force in the country of production.

Working hours:

Promod suppliers and subcontractors will respect the applicable legislation and the existing standards regarding working hours in the related branch of industry.

Workers will not be required to work regularly more than 48 hours per week.

The factory will be in a position to require overtime only to meet some exceptional industrial or business demands and for a short period.

Overtime will be worked voluntarily and should not exceed in any case more than 12 hours per week. Overtime will be remunerated at an increased rate.

Employees must be allowed at least one day off during every seven-day period.

Wages:

Promod suppliers and subcontractors will remunerate employees at rates that meet the national minimum standards or local industry standards and should be entitled to legally mandated benefits.

Subcontracting:

Promod suppliers and subcontractors may not subcontract all or any part of the work on Promod products without their express consent, which will not be given unless each subcontractor meets all of the criteria set forth herein.

Freedom of association:

Promod suppliers and subcontractors shall respect and recognize the rights of all employees to form and join unions and to bargain collectively.

<u>Discrimination</u>:

Promod suppliers and subcontractors will not discriminate employees neither at the hiring time nor during the professional life concerning the salary, benefits, advancement, termination or retirement, on the basis of gender, race, political and religious beliefs, age, sexual orientation, nationality, social or ethnic origin.

Compliance with the labour law regulations:

Promod suppliers and subcontractors will commit themselves to abide by the labour law regulations and to employ legal workers.