

ETHICAL CHARTER 2012

SWORD GROUP is a European IT public limited liability company, specialised in the supply, at a global level, of software and services to regulated industries.

SWORD GROUP has succeeded in its development on the basis of values and principles that are implemented by its senior management and staff.

The present Ethical Charter aims at formalising the common values and principles that are essential to SWORD GROUP and to its staff, so that each person may refer to and comply with the latter. These values and principles clearly assert the ethical commitment of SWORD GROUP and its responsibility, in all its fields of activity, vis à vis the shareholders, the members of the company, the clients, the suppliers and the different partners.

The aim of this charter is also to federate the staff of SWORD GROUP around these values and principles that they commit to complying with as essential actors of the life of SWORD GROUP.

SWORD GROUP'S COMMITMENTS

- Towards its Shareholders: SWORD GROUP has the objective of ensuring a good return on their investment and providing them with complete and transparent information on a regular basis.
- In its relations with its clients and suppliers, SWORD GROUP upholds the principles of integrity and loyalty and promises to provide quality services and products and to respect the commitments made. Hence, the know-how, infrastructures and experience of SWORD GROUP are made available to its clients to help them improve their performance, increase their efficacy and maximise their returns on investment. The success of its products and solutions relies on a unique combination of industry and technology experts, who have a perfect understanding of the challenges faced by corporations and commit to providing innovative solutions within a framework of close cooperation. The talent of the SWORD GROUP teams and the sound network of affiliated partners are the keys to the sustainable success of our company.
- Towards its staff, SWORD GROUP ensures that it respects the rights of its staff, their working conditions and the development of their professional know-how. SWORD GROUP ensures that its staff achieve personal fulfilment, respects their private lives and does its best to favour their creative spirit and their spirit of initiative. SWORD GROUP wishes to develop with each of its members of staff a relationship that is based on trust, respect and rigour.
- Towards civil society, SWORD GROUP participates in the economic and social development of the countries where it works and of which it respects the legislation in force. SWORD GROUP. adheres notably to the principles of the Universal Declaration of Human Rights of 1948 and the International Labour Organisation. SWORD GROUP respects the rules of free competition and ensures that it fights against corruption in all its shapes and forms. SWORD GROUP does not get involved in political life and does not contribute to the funding of political parties. Within the scope of its business activities SWORD GROUP ensures that it respects the environment and sustainable development. Moreover, in 2011, the Company joined Global Compact (United Nations Global Compact), thus committing to complying with the 10 principles relating to Human Rights, labour standards, the environment and corruption.

THE COMMITMENTS OF SWORD GROUP'S STAFF

Since SWORD GROUP's staff are the day to day vectors of the Group's principles and values, the following is requested of them:

- To comply with the legislation that applies,
- ➤ To be loyal and integrated vis à vis SWORD GROUP and to establish and maintain good working relations within the teams and, notably, within this context, to not accept or request gifts or advantages that exceed the standard usage or commercial practices that are likely to influence their behaviour,
- > To rigorously apply the health, safety and protection rules,
- ➤ To establish clear, honest and professional working relations with the clients and partners of SWORD GROUP. The staff of SWORD GROUP shall also provide their clients with an excellent sales approach and top level technical know-how,
- To not disclose to any third parties or to persons employed within the Group who are not authorised to be informed any professional confidential information that they have access to,
- > To respect the confidentiality of the information that they have access to and notably, to not use, for personal ends, either directly or indirect, privileged information that they might hold within the scope of their function and to refrain from any form of insider trading,
- ➤ To avoid any conflict of interest situation between SWORD GROUP and their personal interests,
- If they participate in a political activity, to do so privately, out of working hours and away from the workplace and to refrain from communicating on the fact that they work for SWORD GROUP.