



# ETHICS CHARTER

# GROUPE GMD

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# A MESSAGE FROM THE CHAIRMAN



Since the start, in 1986, of the GMD Group, I have relied upon fundamental values such as expertise, adaptability, exemplarity, team spirit and courage.

These values have served as the basis for our global and international growth.

In order for this trend to continue, I would like to formalize these values in our ethical charter in order to communicate them to our employees and our partners to constitute a guideline for our activities and constitute a collective approach shared by all.

In order to be effective, this charter must be applied by everyone uncompromisingly. When collaborating with the GMD Group, all stakeholders agree to act according to these values.

**Alain MARTINEAU**  
Chairman and CEO



The Codir Groupe stands by its Chairman to promote this charter and share its values by circulating it to all of its employees.

**Cyril BECQUE**  
Group Financial  
& Administrative manager

**François-Xavier LEMASSON**  
General Manager  
Plastic&Leather Division

**Yves MAYET**  
General Manager  
Foundries Division

**Stéphane PAPLOREY**  
General Manager  
Stamping Division

# OUR VALUES

The 7 I philosophy of the GMD Group is expanded with the insertion of the value "INTEGRITY"



## INNOVATION

Owing to dedicated technical centres, the GMD Group provides its customers with proven and recognized business expertise, particularly in the field of Redesign-to-cost as well as ever more innovative solutions.



## INDUSTRIAL EXCELLENCE

The roll out to all of its sites of the best practices of the automotive industry for more than 30 years allows the GMD Group to exceed the levels of performance essential to a worldwide tier 1 supplier.



## INTERACTION

The strengthening of the relationship with its customers is based on the development of a technical and local offer worldwide, but also by simplifying its operation thanks to single contacts.



## INTERNATIONALIZATION

The GMD Group's wish to support its customers globally is reflected in the permanent development of its existing sites but also in the regular creation of new "Green Field" sites close to its customers, all over the world.



## INVESTMENT

A high level of investment on all of its sites guarantees GMD Group customers the best of available technologies, thus enabling quality at the highest level and prices that are always competitive.



## INTEGRATION

The organization of the GMD Group around 3 businesses allows it to integrate strong vertical skills, from design to logistics, including tools and robotics.



## INTEGRITY

The rules of conduct of the GMD Group are clear, known and complied with by all. Each of the GMD Group employees, whatever their position in the company, is a supporter of this exemplarity. It is embodied both in his daily attitude and through his understanding of others.



# USE OF OUR ETHICS CHARTER

While complying with national and international legislation, this Charter aims to disseminate and apply the values of the GMD Group.

This Code of Ethics applies to each employee of the GMD Group and its subsidiaries worldwide, regardless of their position. It must also be shared with its external partners.

As the GMD Group conducts business in a large number of countries, representing many different cultures, laws and political regimes, its Ethics Charter thus sets the Group's standards. It does not supersede GMD Group procedures but has been designed to provide a framework for these procedures and thus allow each Group employee to better understand their logic and purpose.

It must therefore encourage everyone towards the GMD Group and society to behave in an exemplary manner and be worthy of the men and women of the Group. Regardless of the country in which they work, GMD Group employees are all guarantors of compliance with standards, regulations and laws. Everyone must be the guardian of the moral and ethical principles of the Group in order to preserve the reputation and image of the GMD Group.

Its charter is there to guide them and help them make the right decisions. It should therefore be referred to in case of doubt.

It is distributed to all of its employees and can be viewed on its website for external partners.

A professional whistleblowing procedure is available so that each employee knows what to do in the event of a suspected breach of ethics and issues a report if necessary.

# THE ETHIC RULES IN JOB



## INTEGRITY TOWARDS GMD GROUP EMPLOYEES

Each Group employee must be able to work in a caring environment, free from harassment or discrimination.

As member of the United Nations Global Compact since 2003, the GMD Group demonstrates its desire to support human rights, to contribute to the improvement of working conditions, to contribute to environment friendliness and protection and fight against corruption within the framework of its business.

These values have been incorporated into the values that guide the Group's strategy and impact the operational decisions of its managers.



## RESPECT FOR HUMAN RIGHTS

The GMD Group is committed to strictly respecting, in accordance with the rules of the International Labour Organization (ILO), the requirements in terms of minimum age, to respect freedom of association and to recognize the right to negotiate, to eliminate all forms of forced or compulsory labour, to eliminate all discrimination based on age, sex, disability, political and religious beliefs, racial, social and cultural origins as well as trade union activities.



## EQUALITY BETWEEN MEN AND WOMEN

In line with the rules of the ILO and the Global Compact, the GMD Group has implemented a gender equality strategy in order to prevent any discrimination in remuneration, professional development, right to training and recruitment. It undertakes to assess only the skills of his collaborators or candidates.



## RESPECT FOR THE PERSON AND PRIVACY

Each employee of the Group undertakes to respect the members of his team, his company, the Group and, in general, all the people with whom he has professional dealings.

They undertake to respect the privacy of their colleagues, subordinates and superiors, but also that of other Group employees or personnel outside the company with whom he has professional relations.



## RIGHT TO SAFETY AT WORK

The GMD Group is committed to implementing organization and communication so that each employee of the Group knows, respects and enforces the safety rules. The necessary measures are put in place to ensure that working conditions preserve the health and safety of employees.

The GMD Group complies with the laws and regulations regarding the protection of employees' personal data.



# ETHICS RULES IN BUSINESS DEALINGS



## COMPLIANCE WITH LAWS AND REGULATIONS

The GMD Group undertakes to comply with the laws and regulations applicable in the country in which it works by following local and international tax and customs regulations, local and international social legislation.

It shall refrain from any anti-competition practice, namely: abuse of a dominant position and economic dependence, illicit agreement, etc. Each employee at any level must ensure compliance with these laws and regulations in his area of responsibility and must ask his partners or suppliers to have the same degree of demand.



## TRUTH OF ACCOUNTING DATA, INFORMATION AND INDICATORS

The GMD Group is committed to the sincerity of its financial data by involving its employees in an internal control dynamic where each employee of the Group must:

- Record and have recorded accounting or financial or management data. The charges and income recorded must strictly reflect the activity and be reported in accordance with applicable accounting principles and the management standards defined by the Group,
- Feel responsible for the integrity and sincerity of the information,
- Calculate and pass on reliable and sincere indicators



## CORRUPTION PREVENTION

The GMD Group condemns all forms of corruption. Any corrupt practice such as accepting or paying bribes, accepting or paying facilitation payments, granting advantages to a private person or a public official is prohibited.

The principles of integrity and loyalty in its dealings with suppliers and customers are respected by the Group. In this sense, its employees are prohibited from soliciting and/or accepting any gift. This also includes any invitation to seminars or non-professional trips.

All the rules relating to the prevention of corruption appear in a code of conduct distributed to all of its employees.



## CONFLICTS OF INTEREST AND SHARE ACQUISITION

Each Group employee may find himself faced with situations in which his personal interest may conflict with the interest of the Group. In such a situation, all staff members must declare to their superiors what could be a source of conflict of interest.

With the exception of the purchase of listed securities that comply with the rules prohibiting the use of privileged information, each employee of the Group is prohibited from taking any interest in a supplier, competitor or customer without referring to his management.



## RESPECT FOR COMPETITION

As part of its business, the GMD Group undertakes to comply with all laws and regulations in force with regard to free competition in all the countries where it conducts business and expects the same commitment from its employees and business partners.

The GMD Group prohibits any agreement with its business partners resulting in restricting competition, in particular the fixing of selling prices, market sharing or anti-competitive boycott.



## ECONOMIC PARTNERS

The GMD Group wants relations with its economic partners (suppliers, financial partners, etc.) to be established in a fair and equitable manner. Thus, the selection of partners must be made according to objective criteria of performance, quality and with a permanent concern for respect for fundamental social rights.





# ETHICS RULES IN THE COMPANY



## PRINCIPE OF CONFIDENTIALITY AND EXCLUSIVITY

Compliance with the principle of confidentiality relating to all information (strategic, industrial, financial, social data, etc.) and documents relating to the business of the GMD Group companies is vital.

In the same way, any member of staff employed full-time and wishing to have a professional activity outside the Group should first seek the formal agreement of their superiors.



## POLITICAL AND RELIGIOUS ACTIVITIES

Tolerance towards political and/or religious opinions is essential for the GMD Group. However, these activities must be carried out outside the Group, in a private setting and outside working hours.

In addition, the GMD Group displays its neutrality and does not finance any institution of a religious nature or any political party.



## IMAGE OF THE GROUPE AND ITS REPRESENTATION

Each Group employee carries the image of the Group and the companies that make it up. Thus, everyone must contribute to the positive notoriety of the Group and must refrain from any disparaging in any form whatsoever against the Group, its subsidiaries, its managers or its strategy.

Any external communication must be subject to prior validation by the line manager, who must inform General Management.



## RESPECT FOR PROPERTY OF THE COMPANY

Each Group employee is responsible for the proper use of the assets and resources of the Group and its subsidiaries.

Company assets should only be used for business purposes and in accordance with applicable procedures.

Everyone must take all necessary measures to prevent their deterioration, theft or unauthorized use.

Each employee takes care not to use his status or his authority to secure special advantages or privileges.

# ETHICS RULES TOWARDS OUR CLIENTS



## CONFIDENTIALITY OF CLIENT DATA

As part of its business, the GMD Group undertakes not to disclose or use customer data for purposes other than those authorized by the customer itself.



## DATA SINCERITY

As part of its business, the GMD Group strives to provide customers with reliable and sincere information on the characteristics of the Group's products and services.



## PRODUCT SAFETY AND QUALITY

As part of its business, the GMD Group complies with all the rules, processes and technical and environmental requirements aimed at the safety and quality of the Group's products and services.

# RESPECT FOR THE **ENVIRONMENT**



The GMD Group is committed to complying with the environmental laws and regulations applicable in the countries in which it does business. Thus, it complies with environmental laws and regulations both locally and internationally. In all its operations, Groupe GMD is committed to taking respect for the environment into account. It endeavours to reduce the negative impact of its activity on the environment and is committed to preserving natural resources and developing its waste management policy.

The GMD Group is committed to controlling and reducing its contribution to greenhouse gas emissions and to acting as a responsible industry on each of its sites. It carefully monitors any contributing operation by measuring its environmental impact and seeking to reduce the same. These decisions are adapted according to the location of its subsidiaries, taking into account their particularities.

Each employee is also associated with this approach by committing to respect the rules of waste management and the preservation of natural resources. It also ensures that its partners comply with equivalent requirements.





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