



Code of Conduct and Ethics

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INTRODUCTION

The Code of Conduct and Ethics is a reference document which explains the principles and behaviours expected of employees of the Sommet Education Group. It outlines all the different aspects of our culture and lists the company's key policies and procedures regarding personal integrity, use of information and business conduct. Finally, it explains the procedure that should be followed when any failures are observed, so that everyone can ensure that this Code is complied with.

Hereafter, the various different entities of Sommet Education are also collectively referred to as “the company” and “the Group”.

The Code was written in French and then translated into English. In the event of a dispute over its interpretation, the French version shall prevail. This document cancels and replaces the previous one.

The Code comes into effect on 1st June 2019.

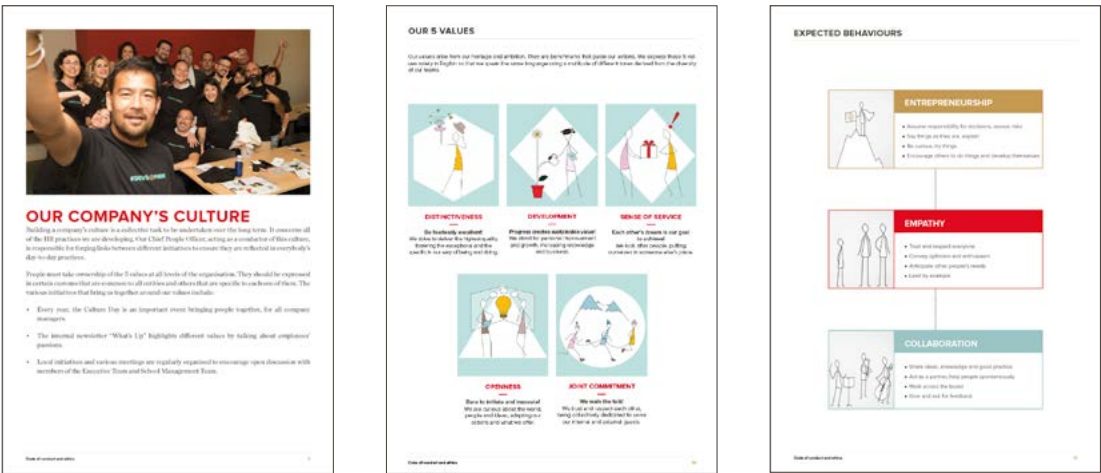
HOW TO USE THIS CODE

The document is structured as follows:

3 interviews set out Sommet Education’s ambition, purpose and culture.



A detailed section on our culture, to explain how our values, mindset and leadership model interact with one another.



We offer employees an information, awareness and training programme to further develop certain topics covered by the Code.

The programme is called “**stand^{up}**”, and it demonstrates our desire to improve our efforts and make a long-term commitment regarding these topics.

The content will gradually be developed and made available on [MyHRCorner](#). The topics dealt with are referenced in this document using the “**stand^{up}**” label.

HOW TO USE THIS CODE



This section lists the various principles that guide our actions regarding our stakeholders in accordance with our values and local regulations.



Related policies and procedures available on MyPlace

Commitments regarding the topic



Definition and principles

Explanatory text on the topic and the principles of good conduct

A practical example

to illustrate how the principles of the Code are applied



This section explains how the Code is administered and what to do in the event of violations.



Index

To help you find where specific topics are dealt with.

OUR AMBITION



“Light the path to become the leading player in our sector”

Benoit-Etienne Domenget, Chief Executive Officer, discusses his vision of the industry and Sommet Education’s ambition. He explains how the Code of Conduct and Ethics can enable everyone to achieve this ambition.

CHECK IT OUT ON
MYPLACE

Watch the video
of this interview.

Our vision

Our universe, the hospitality industry, is undergoing a profound transformation. The models emerging today as a result of digitalisation will be the norm tomorrow. In this context, hospitality management, culinary and pastry arts education must be able to meet the needs of the present while adapting to the challenges of the future. This is reflected in our teaching through an approach that combines the acquisition of know-how with soft skills. This enables students to master the rules of today’s world of hospitality while acquiring new methods and practices in order to imagine and build tomorrow’s industry.

Being the global leader in our sector

We aspire to be the world leading player in hospitality management, culinary and pastry arts education and this is one of a kind adventure. We are fortunate to be able to capitalise on the legacy of 3 iconic educational brands: École Ducasse, Glion and Les Roches. We need to cultivate their entrepreneurial DNA and look to the future with the mindset of a challenger in order to become the leader in our sector.

To do this, we must become a benchmark and create tomorrow’s trends. Our brands must be perceived as standards of quality and undisputed excellence.

We will pursue this ambition thanks to a shared commitment and strong values which inspire and are the foundation of our behaviours. Using the analogy of music, our values may be a very beautiful tune to our ears, but they must be constantly practiced if they are to continue sounding perfect.

The Code of Conduct and Ethics supports Sommet Education’s ambition and its human endeavour

The Code brings us together around 4 major commitments. The first is to be a means of ensuring that everyone adheres to the company’s values and adopts its principles. The second is to underpin our desire to develop all talents in their diversity. The third is to say how we want to conduct our business in a sustainable and ethical way. The fourth is to respect all our stakeholders: employees, students and families, the planet and key partners.

There are many ways to become the leading player in our sector. With the Code of Conduct and Ethics, we can highlight what needs to be done in order to achieve our ambition, namely to implement our values and their underlying leadership principles of entrepreneurship, collaboration and empathy.

This Code is more than just a set of rules, it shows us the path to our success.

OUR PURPOSE



“Advance the spirit of a more gracious and hospitable world”

Karine Hyon Vintrou, Vice President Marketing, outlines the positioning of Sommet Education brand. She explains how the values of the company match the Group’s positioning and purpose.

From Sommet Education’s origins to its current position

Sommet Education consists of several brands which share the same family spirit. This is reflected in a human sized campuses and a personalised approach to accompanying each student.

“We want to be the thought-leader at the vanguard of hospitality and experience education...”

Sommet Education positions itself as the innovative leader of hospitality management, culinary and pastry arts education. We serve professionals and students who are eager to access innovative teaching and want to be pioneers, combining theory and practice. We develop the abilities and confidence of these future leaders to anticipate and shape tomorrow’s world. To do this, we combine a tailored learning approach with experiences that have a transformative effect. Our wide network of alumni and proximity to today’s industry leaders facilitate sharing and exchanges, giving people a head start.

Being the global leader in our sector

To find a way of expressing this common purpose in the best possible way, a large study was conducted with the stakeholders of each of our brands: students and their parents, the alumni community, industry leaders, faculty members and head office staff. What emerged was a shared conviction that we provide our students with expertise and a mindset that improve their prospects for a promising future.

“... to advance the spirit of a more gracious and hospitable world”

This purpose is the contribution we seek to make to the world. Each carefully-chosen word must resonate in everyone’s heart. Our collective ambition is to challenge the status quo, and to make our future graduates an asset for progress in tomorrow’s industry.

The word “spirit” pays tribute to the “Les Roches Way of Life”, the “Glion Spirit” and the pioneering vision of École Ducasse.

Like diplomats, our students have learned to share their own culture and to adapt to the image of their host country. They also have a responsibility: they are leaders of multicultural teams serving an international clientele, and they are decision-makers who can have a considerable impact on the local economy, communities and the environment.

Our values, the foundation upon which we are building the Sommet Education family

This purpose sets the tone with which we should align ourselves as we pursue this common endeavour. Our values are notes on the musical score we want to play together.

What brings us together is our desire to contribute to the development of future leaders and to help fulfil their potential and open their minds. Sommet Education combines a family of brands built on a foundation of values, which each in their own way reflects the family DNA in the same way as siblings do.



“Ensure that the values which unite us resonate in everyone’s heart”

Stéphane Rousseau, Chief People Officer, is building Sommet Education’s human project upon a common set of values and leadership principles. These lie at the heart of the new HR policies he is developing with his teams.

CHECK IT OUT ON MYPLACE

Watch the “HR Line of Thought” video to find out about our 5 values and the leadership model.

Find out about your colleagues and what they are passionate about in the different releases of “What’s Up”.

Do the quiz “See how Sommet Education fits with you?” to assess your compatibility with the 5 values.

Creating a new culture

The creation of Sommet Education has brought about important cultural changes for employees, due to the emergence of a Group that seeks to be the leader in hospitality management, culinary and pastry arts education, the proximity of the head office in Switzerland – the historic home of hospitality and experiential education – and a new approach aimed at promoting the complementarity of the École Ducasse, Glion and Les Roches.

Our common set of values reflects a studied balance between using the best of our past and building a collective dynamic to achieve our ambitions.

“These values only mean something if they result in behaviours that reflects them and if they foster a common culture based on the company’s own leadership model”.

Everyone is a talent

Everyone is a talent, and our role is to detect this talent and to accompany people in their development. This is Sommet Education’s employer promise, namely what the company is committed to doing for its employees through the HR policies it is implementing.

All talents can display leadership. Leadership is not dependent on status, but rather it is an attitude underpinned by 3 behaviours, entrepreneurship, collaboration and empathy, which we believe to be vital and are deeply related to the values.

“**#HIGHERTOGETHER** is the signature of the company’s human project”.



OUR COMPANY'S CULTURE

Building a company's culture is a collective task to be undertaken over the long term. It concerns all of the HR practices we are developing. Our Chief People Officer, acting as a conductor of this culture, is responsible for forging links between different initiatives to ensure they are reflected in everybody's day-to-day practices.

People must take ownership of the 5 values at all levels of the organisation. They should be expressed in certain customs that are common to all entities and others that are specific to each one of them. The various initiatives that bring us together around our values include:

- Every year, the Culture Day is an important event bringing people together, for all company managers.
- The internal newsletter "What's Up" highlights different values by talking about employees' passions.
- Local initiatives and various meetings are regularly organised to encourage open discussion with members of the Executive Team and School Management Team.

OUR 5 VALUES

Our values arise from our heritage and ambition. They are benchmarks that guide our actions. We express these 5 values solely in English so that we speak the same language using a multitude of different tones derived from the diversity of our teams.



DISTINCTIVENESS

Be fearlessly excellent!

We strive to deliver the highest quality, fostering the exceptional and the specific in our way of being and doing.



DEVELOPMENT

Progress creates sustainable value!

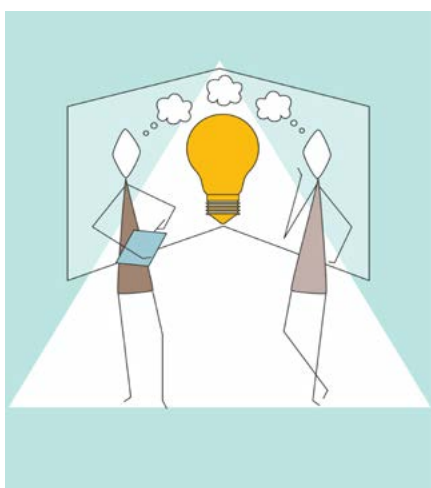
We stand for personal improvement and growth, increasing knowledge and business.



SENSE OF SERVICE

Each other's dream is our goal to achieve!

We look after people, putting ourselves in someone else's place.



OPENNESS

Dare to initiate and innovate!

We are curious about the world, people and ideas, adapting our actions and what we offer.



JOINT COMMITMENT

We walk the talk!

We trust and respect each other, being collectively dedicated to serve our internal and external guests.

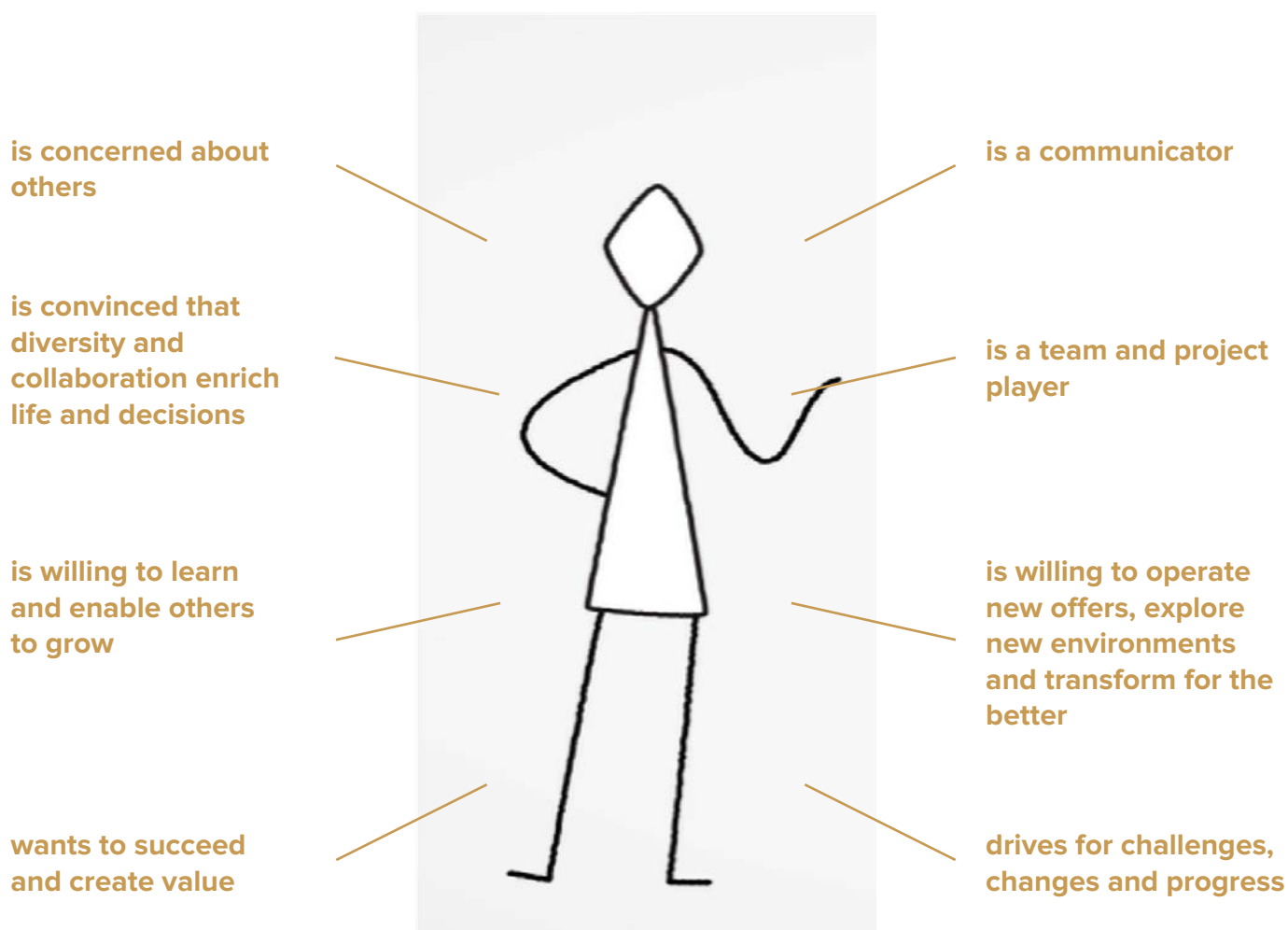
OUR LEADERSHIP MODEL

Every employee is a talent and has the ability to develop leadership skills.

With our behaviours, we embody Sommet Education's values and play a role in its success. To develop the potential of all employees, we have developed an ideal leadership profile to which everyone should aspire, irrespective of their position.

This model gives rise to 3 major families of key behaviours which reflect and embody our values in our everyday actions.

OUR VISION OF THE GOOD LEADER...



... GIVES RISE TO 3 MAJOR FAMILIES OF BEHAVIOURS

ENTREPRENEURSHIP

EMPATHY

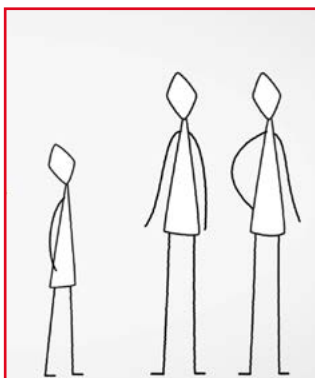
COLLABORATION

EXPECTED BEHAVIOURS



ENTREPRENEURSHIP

- Assume responsibility for decisions, assess risks
- Say things as they are, explain
- Be curious, try things
- Encourage others to do things and develop themselves



EMPATHY

- Trust and respect everyone
- Convey optimism and enthusiasm
- Anticipate other people's needs
- Lead by example



COLLABORATION

- Share ideas, knowledge and good practice
- Act as a partner, help people spontaneously
- Work across the board
- Give and ask for feedback



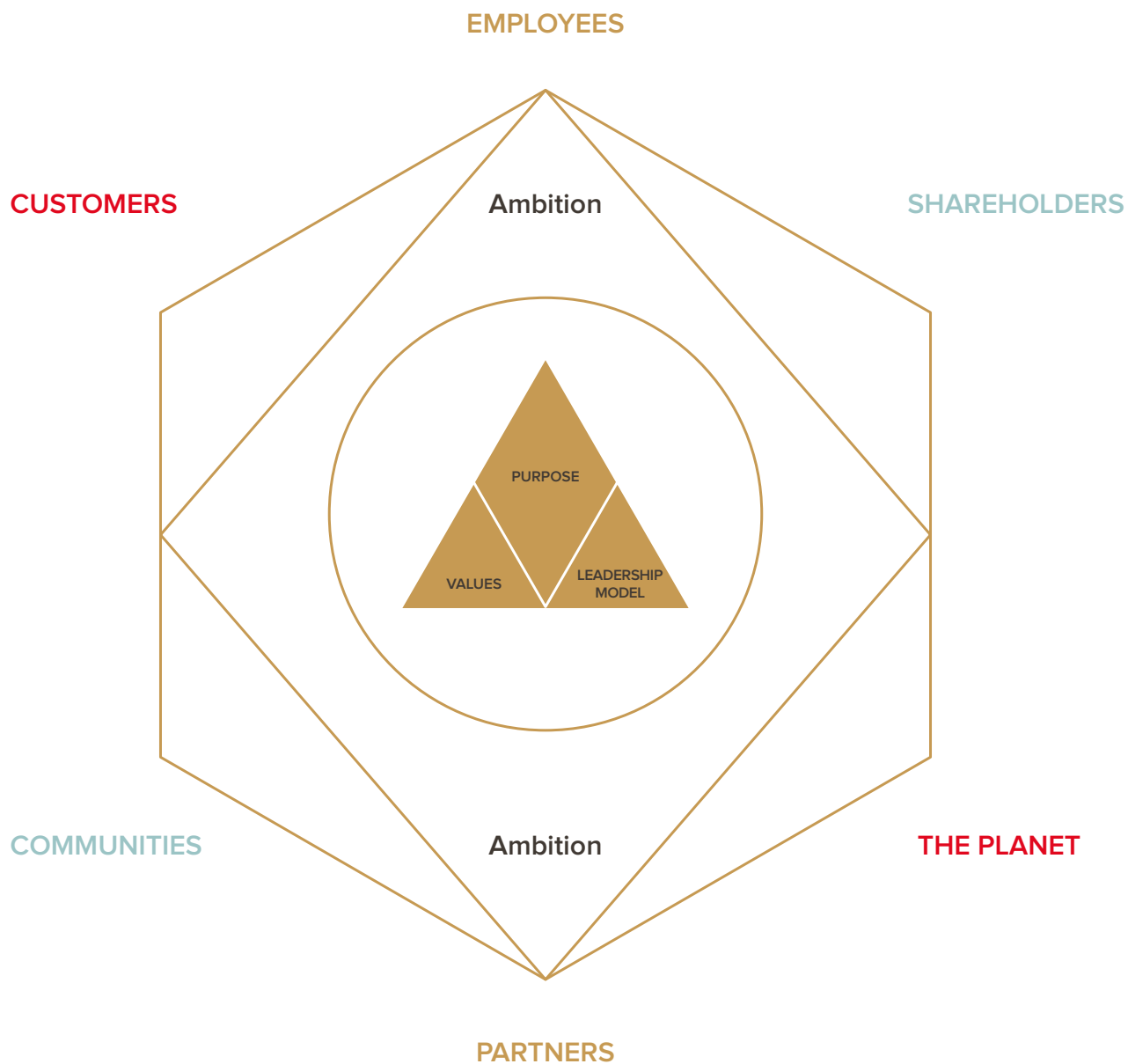
OUR COMMITMENTS

Sommet Education's purpose and culture are the foundations bringing all employees and partners together in the pursuit of a common goal, which is to be the leading global player in hospitality management, culinary and pastry arts education.

These shared foundations guide dialogue with all stakeholders. We need to be attentive to and meet their expectations. This concerns:

- Our employees, who are involved in this human endeavour every day;
- Our customers, students and their families as well as learners in the industry, who trust us to offer them with an incomparable educational experience;
- Communities, which include all local actors present around our campuses;
- Our key business partners and shareholders who support our development and efforts to realise our ambition;
- The planet, our environment and its resources, which we are committed to preserving.

OUR STAKEHOLDERS



We have grouped our main commitments towards our stakeholders under the following 3 headings:

- Developing talent in a caring working environment
- Using information and assets responsibly
- Conducting our business in an ethical manner

DEVELOPING TALENT IN A CARING WORK ENVIRONMENT



We are committed to developing all talents and to respecting personal integrity. This means valuing our diversity and inclusive practices as well as preventing workplace bullying and sexual harassment.

ACQUIRING TALENT

We must see our values in the mindset of recruited candidates and reflect them in our recruitment methods...

CHECK IT OUT ON MYPLACE

You can find our Recruitment Guidelines on the Human Resources page.

Our long-term success depends on our ability to attract, retain and develop our employees in order to grow the business.

Every employee joining Sommet Education becomes a fully-fledged stakeholder in our company's culture, which implies making a commitment to the organisation and expressing a desire for continuous improvement. For this reason we will pay particular attention to ensuring that candidates' qualities match the values of the company.

Every year, Sommet Education receives a large number of applications and the talent acquisition process provides an opportunity to convey our values by integrating them into each step of the selection process. In order to offer a professional and personal recruitment experience, we have designed a selection process which complies with all ethical and legal standards and reflects the principles of our company's culture.

In order to promote our talents and encourage first and foremost internal advancement, the Human Resources (HR) Department is committed to consider internal applications before looking outside the company.

As mentioned in the section on "Promoting diversity and inclusion", Sommet Education values the diversity of its staff. Therefore, the only factors that will be considered during recruitment are their skills and experience as well as their acceptance for the above-mentioned principles.

Furthermore, the integration of new employees into the company is as important as the selection of candidates. Newly-hired people need to be welcomed in such a way that their skills and personality can blend naturally into company's culture. Just as new employees are required to respect this culture, all employees must be open-minded about new ideas and proposals from outside.



WE ARE HIRING!

Visit our career website:

<http://www.sommet-education.com/jobs/>

ACCOMPANYING TALENT

All employees are talents and can develop their leadership skills...

To fulfil this promise, we have made talent development a shared responsibility between managers and employees. The HR representative is the facilitator of this relationship and guarantees the fairness of talent management processes.

Talent management reflects our desire to attract and integrate people, to develop and cultivate skills, and to improve employees' performance in order to achieve the company's current and future goals.

Talent management is also a means for disseminating our company's culture and getting our employees to adopt it.

To support the development of Sommet Education and its employees, an overall Human Resources Information System (HRIS) has been set up.

OUR COMMITMENTS

- To promote dialogue on company's culture and review the year's achievements through the Talent Performance process
- To enable our employees to develop themselves through specific learning programmes and experiences
- To provide a tool accessible to all employees to facilitate their development and progression within the company, and which centralises all employee HR processes

Talent Performance

CHECK IT OUT ON MYPLACE

You can find all information on the process and relevant documents on the Human Resources page.

Talent Performance is a tool we can use in order to forge and embed our company's culture. It allows us to set and assess our annual priorities. The approach entails a series of discussions (as opposed to a single annual assessment), adaptation of objectives according to the type of employee concerned, and a simple format entailing 3 key steps over the year.

- **Highlights Definition** which defines the objectives/priorities and possible development activities for each employee.
- **Feedback Discussion** which is held at the initiative of employees, and who therefore control their career development and monitor their objectives. They discuss their progress with their manager and adjust annual priorities according to changes in circumstances.
- **Wrap Up** to assess employees' achievements and to ask them about their career aspirations.

With a simple, short format that is suitable for all employees, these 3 interviews offer managers and employees an opportunity to discuss company's culture and what has happened over the year.

WHAT DOES THIS MEAN IN PRACTICE?

"This summer, my team's priorities changed and I took on new responsibilities. I found a training course that should help me improve my skills in this new field of activity. How can I talk to my manager about it?"

This is one of the purposes of the Feedback Discussion, which always takes place at your initiative. With your manager you can review progress made in achieving the year's objectives and if necessary adjust what had been jointly decided during the Highlights Definition interview at the beginning of the year. It also offers an opportunity to talk about the employee's development plan and adapt it if needed.

1. HIGHLIGHTS

Establish a plan for the year

2. FEEDBACK

Review progress halfway through the year

3. WRAP UP

Report back at the end of the year



Learning

CHECK IT OUT ON MYHRCORNER

You can access all internal training programmes in the MyTraining section.

Our job is to teach, develop and provide a life experience for future hospitality and culinary leaders. We therefore make the same promise to all our employees: that we will support them and enable them to thrive so that they attain excellence.

Sommet Education strives to give each employee the opportunity to grow and flourish in their professional environment. All talents are also aware of the need for ongoing individual development. It is therefore our collective responsibility – as employer and as employees – to be attentive to and to identify these needs and then to deploy the necessary means in order to meet them in the future.

For these reasons we are developing a number of special programmes to meet the needs of large numbers of employees and those of more specific groups.

start^{up}

Open to all, this programme provides an introduction to Sommet Education, its brands and key statistics. It also gives an overview of the schools' programmes.

stand^{up}

Open to all, this programme goes into greater detail about certain aspects of the Code of Conduct and Ethics.

up^{lead}

For top management, to train them in the Sommet Education leadership style.

up^{sell}

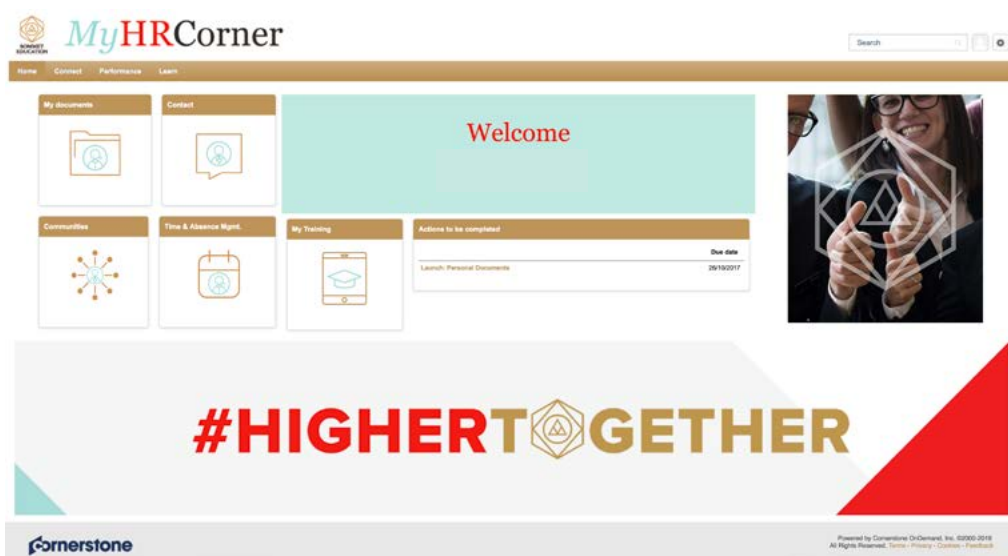
For sales teams, to support them in their discussions with our future students and to improve their recruitment techniques.

move^{up}

This e-learning programme provides individual/collective development around 8 themes/curriculums. Local key players push content according to the community or individual needs.

The HR Information System

MyHRCorner is our Human Resources Information System (HRIS), which is a platform for managing and monitoring all modules in the automated HR process.



WHAT DOES THIS MEAN IN PRACTICE?

What are the benefits of this system?

The HR Department can:

- Optimise the administrative aspects of hr management
- Improve operational efficiency and increase availability, focusing on links with teams
- Provide a set of good, exploitable data

Managers (phased introduction until 2020) can:

- develop and retain employees through the ongoing implementation of the Talent Performance process
- validate training requests
- obtain an overview of the objectives/priorities set for all employees, at all times
- simplify administrative tasks, freeing up time for quality dialogue with employees

Employees (phased introduction until 2020) can:

- access their personal space at all times, and download all personal documents
- consult and modify relevant personal information
- complete the different stages of the Talent Performance process and apply for training if necessary

PROTECTION OF PERSONAL INTEGRITY

We protect everybody's personal integrity...

CHECK IT OUT ON MYPLACE

You can find the contact details for the trusted person in your entity on the the Corporate Social Responsibility page.

We believe that a healthy and caring work environment is key to well-being and self-esteem. Our priority is to permit everyone to flourish in a cooperative and motivating work environment, free from discrimination and harassment.

Respecting the personal integrity of others is a prerequisite for maintaining a work environment that is favorable to the development of all employees and of our company. To fail to do this would endanger employees' health and the performance of the company. Violations of personal integrity include every sort of attack on individuals. Behaviours that overstep limits and undermine other people's self-esteem include discrimination, workplace bullying and sexual harassment.

OUR COMMITMENTS

- To promote equal opportunities for all employees
- To provide a pleasant work environment where each person's integrity is respected
- To refuse all forms of discrimination
- To not tolerate any form of harassment
- To conduct awareness-raising and training activities on various topics related to personal integrity (discrimination and harassment)

WHAT DOES THIS MEAN IN PRACTICE?

"I am experiencing an upsetting and disrespectful situation but dare not speak about it to my line managers or colleagues. I am advised to consult the trusted person about it. What is their role?"

The trusted person is an intermediary who can support you in the event of your personal integrity is threatened. You can seek their advice, be assured of their full discretion and support in taking any necessary steps, including whistleblowing (see the section on Implementing the Code). They can be a trained member of staff or an external partner depending on the arrangements adopted by your entity. Other possible intermediaries are given in the whistleblowing procedure.

Promoting diversity and inclusion

CHECK IT OUT ON STANDUP

You can find this topic
in our “stand^{up}”
programme.

Sommet Education is convinced that diversity is an asset and key to the success of its business project. It is committed to providing everyone with the same career and advancement opportunities.

We strive to uphold the principles of equality and seek to eliminate all forms of discrimination in order to provide an inclusive work environment. This commitment is rooted in our common values.

Our company’s culture adapts to people’s individual differences and caters to their needs in order to give them every chance of success in the company. It is underpinned by an environment and actions designed to guarantee equal opportunities and prevent discrimination.

The following are considered discriminatory: words and actions that have the effect of belittling or disadvantaging a person because of their social status, including their origin, race, gender, age, language, social background, sexual orientation, lifestyle, religious or political beliefs and physical, mental or psychological disability. All other things being equal, the principle of equality is breached when a person is not treated equally with another person because of one of the criteria set out above, and this leads to a form of humiliation and exclusion.

We therefore do not tolerate any form of discrimination based on any of the above characteristics, nor any similarly offensive behaviour. These principles apply to all employment decisions, including recruitment, training, evaluation, promotion and remuneration.

WHAT DOES THIS MEAN IN PRACTICE?

“I work in the HR Department. The training requests of one of the managers are only for the men in his team. How can I tell if this is gender discrimination?”

Ask the manager some questions in order to find out which criteria were used to select individuals from their team for training. Like with promotions, training must be accessible to all, according to needs as well as criteria such as performance and availability. In no circumstances may access be based on criteria such as age, sex or nationality.

Preventing all forms of harassment

CHECK IT OUT ON STANDUP

You can find this topic
in our “stand^{up}”
programme.

Sommet Education seeks to guarantee employees’ personal and physical wellbeing and to protect their dignity, in particular with regard to harassment. Everyone has the right to decent and respectful treatment from each of our stakeholders (managers, colleagues, suppliers, customers, partners, and so on) and has the same duty towards them. Therefore no form of harassment is tolerated. Any such act must be immediately reported, assessed and, if necessary, subject to disciplinary action.

Anyone who believes they are a victim of **workplace bullying or sexual harassment** should report it and may formally file a complaint with Sommet Education. Through the various intermediaries identified in the whistleblowing procedure, you may address the issue in all confidence.

Workplace bullying is abusive conduct which, through repeated or systematic actions, words, attitudes or behaviour, has the effect of deteriorating a person’s quality of life and/or working conditions.

WHAT DOES THIS MEAN IN PRACTICE?

“How can I tell the difference between a normal conflict and a workplace bullying situation?”

Conflicts between individuals in everyday life are a normal phenomenon and can be constructive when the upshot is to find a mutually-beneficial solution. Workplace bullying differs from ordinary conflicts and it is characterised by unethical behaviour. We refer to workplace bullying when certain sorts of behaviour are recurrent, systematic and spread over a long period of time. The form of aggression can change from day to day.

Different types of behaviour that can be considered as workplace bullying can be divided into 5 areas:

- 1. Communication:** stopping someone from expressing themselves, constantly interrupting them, shouting at them, withholding information, etc.
- 2. Social relationships:** refusing any contact with someone, failing to greet them, ignoring them, excluding them, isolating them, etc.
- 3. Reputation:** ridiculing someone, spreading rumours about them, making fun of them, humiliating them, make insulting remarks, etc.
- 4. Quality of life and professional standing:** assigning someone ridiculous, inappropriate or offensive tasks, subjecting them to gratuitous criticism, depriving them of important tasks, etc.
- 5. Health:** physical threats and violence.

Preventing all forms of harassment

CHECK IT OUT ON STANDUP

You can find this topic
in our “stand^{up}”
programme.

Sexual harassment is unwelcome conduct of a sexual nature that violates a person’s physical or psychological dignity or integrity in their working environment. For example, it may consist in constant glances, sexist or vulgar remarks, exposure of pornographic material, embarrassing invitations, touching, advances accompanied by promises of benefits or threats of reprisal, forced sexual acts, etc..

It concerns behaviour in the workplace as well as in other places, if it is harmful to someone in the framework of their employment.

WHAT DOES THIS MEAN IN PRACTICE?

“How to know if this is sexual harassment?”

Sexual harassment may involve words or actions and take different forms:

- Sexual remarks or derogatory comments about someone’s physique
- Sexist remarks and jokes about someone’s sexual characteristics, sexual behaviour and sexual orientation
- Exposure of pornographic material (shown, displayed or exhibited)
- Persistent invitations with sexual intentions
- Unwanted physical contact
- Advances with promises of benefits or threats of reprisal
- Following someone inside or outside the company
- Touching, restraint or rape



Professional distance between staff and students

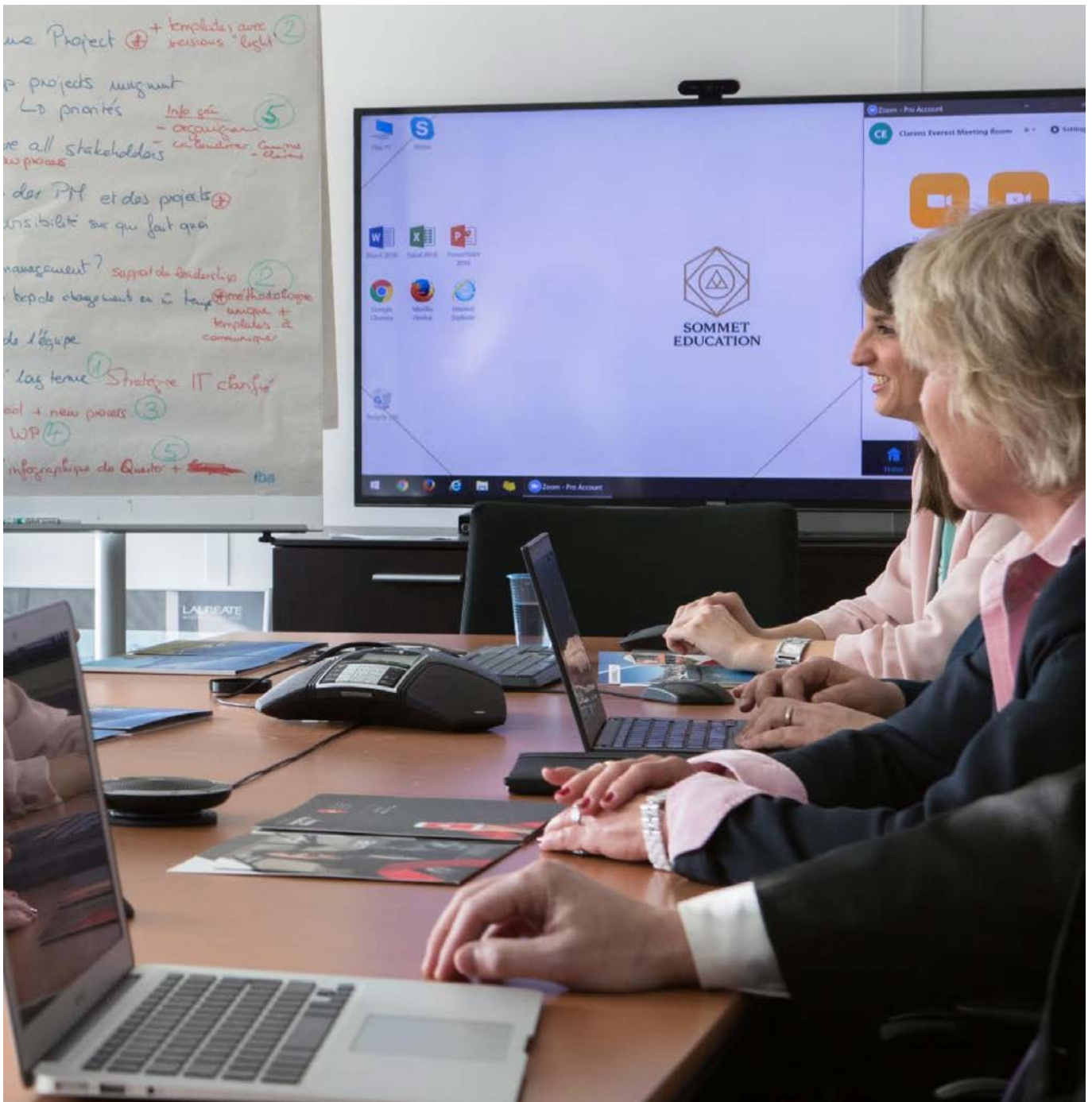
Members of staff must maintain a professional distance from the students and cannot be overly demonstrative. It is prohibited for members of staff to forge close links with students beyond the professional interactions (including on social media). Any violation of these principles can result in disciplinary action, including dismissal.



Excessive consumption or addiction

We remind you that any form of excessive consumption or addiction (alcohol, drugs, other harmful substances) can lead to behaviour that is contrary to our ethical principles and endangers the health and safety of employees themselves, colleagues, others in the workplace, road users, friends and family. We therefore do not tolerate any such behaviour on the premises of our establishments. For further information, please refer to relevant local regulations on this matter.

USING INFORMATION AND ASSETS RESPONSIBLY



In our role as an education provider, we hold and use a significant amount of personal and confidential information. We are committed to protecting and using this information responsibly. The same goes for Sommet Education's own assets and information.

We protect Sommet Education's assets and ensure their proper use.

CHECK IT OUT ON STANDUP

You can find this topic in our "stand^{up}" programme.

CHECK IT OUT ON MYPLACE

Consult the IT Policy to find out more about the proper use of IT resources at your disposal.

Sommet Education assets, both tangible and intangible, are for the benefit of our operations, and should be used only for legitimate purposes related to our operations, and only by authorised employees, faculty members, or contractors. Theft or destruction of these assets, or even carelessness in using them, can harm Sommet Education. Employees are provided with the resources they require in their positions in order to be able to carry out their jobs and achieve their professional objectives. In exchange, they take care of the property and resources of the company and protect them against loss, damage and theft.

For example, we may make limited and occasional personal use of certain assets, such as the computer, telephone, email, and Internet access, as long as this does not interfere with Sommet Education operations. We may not use these assets for any illegal or improper purpose, including gambling, pornography, or to further a business outside of Sommet Education, or in any manner that is contrary to the company's policies or the Code. Sommet Education may access or retain any information on any of its computers or email systems, where permitted by Sommet Education policy and applicable law. We must not transfer any data or information to any computer other than for use in our operations, and should not load any software without receiving the prior permission of the IT Department.

WHAT DOES THIS MEAN IN PRACTICE?

What are Sommet Education assets and how must they be protected?

Tangible assets include Sommet Education's physical property, objects, money, and computer systems. Intangible assets include intellectual property and any other confidential information such as trade secrets, patents, trademarks and copyrights, business, strategic plans, curricula, designs, databases, Sommet Education records (including student records), salary information, and any unpublished financial data and reports.

Protecting the company's assets and by extension the intellectual property of other people involved with Sommet Education means not copying, selling on or transferring any publications protected by copyright, including software, articles, books, curricula, databases and any other confidential information, except if we are authorised to do so under a particular contract.

USE OF DIGITAL MEDIA

Our use of digital media must not harm Sommet Education, our colleagues, our students, or our business partners...

DO THE RIGHT THING!

If unsure, we should never hesitate to seek advice from the Communication Department.

Sommet Education's reputation is everyone's responsibility. Whether on social media or other informational channels, it is vital to bear in mind the importance of the company's on-line visibility for our reputation.

Social media offer exciting possibilities, but carry many dangers. We must exercise care in connection with the use of all online public forums, including blogs, wikis, chat rooms, social networks, user-generated audio and video, or other social media. Because social media tend to blur the line between public and private, personal online behaviour may be subject to this Code of Conduct and Ethics.

Only those specifically authorised by the Group may post content as a representative of Sommet Education, and these individuals must always identify their affiliation with Sommet Education. Whenever we post, we should be honest, truthful, and respectful. And if we are not posting on behalf of Sommet Education, we should make clear our postings are made in our personal capacity, and that any opinions expressed are our own.

We must not post the Group's confidential information or the confidential information of our students or business partners. Similarly, we may not use Sommet Education's logos, trademarks, copyrighted information, and other intellectual property without specific authorisation. And we should never post identifiable information about our students on public sites.

WHAT DOES THIS MEAN IN PRACTICE?

"Our campus is organising an open day. I take some photos and share them on LinkedIn and Facebook in order to promote my institution's activities throughout my network. Is this compatible with the principles set out in the Code?"

Promoting your school is a laudable goal. The way you do it is just as important. Are you authorised to represent Sommet Education as part of your duties? If so, did you seek the permission of any people who are recognisable in photos, as this is essential to ensure that their rights are respected?

An alternative might be to forward material created by the Communication Department, adding a personal comment, always in a respectful and professional manner.

CONDUCTING OUR BUSINESS IN AN ETHICAL MANNER



Compliance with local laws and the rules of international trade is a principle we must respect and which is stressed by this Code. We are committed to fighting all forms of corruption, avoiding any conflicts of interest, and choosing responsible business partners. Reliability and accuracy are the fundamental characteristics of our financial and non-financial books and records.

We follow the laws of the countries in which we operate AND the Code of Conduct and Ethics...

Sommet Education is committed to compliance with all laws applicable to its operations, everywhere around the world. Under certain circumstances, local law may establish requirements that differ from this Code. If there is a conflict between local law and this Code, we must comply with the law. If we are uncertain, we are expected to use reasonable judgment and seek advice or clarification from the Legal Department. In addition to the Code and other Sommet Education corporate policies, in many cases local policies and academic codes at our institutions may impose additional requirements on our conduct. We must follow these guidelines. And if there is a conflict (between the Code, other corporate policies or local policies), we recommend that the more restrictive standard should be met, as a matter of precaution.

OUR COMMITMENTS

- To comply with both the letter and spirit of the laws in all countries in which we operate
- To know the Code, uphold it within our institutions and comply with its principles
- To avoid activities that may call into question Sommet Education's integrity
- To ask for guidance if we are unsure of the appropriate course of action
- To report if we observe conduct that may violate the law or the Code

WHAT DOES THIS MEAN IN PRACTICE?

How do we know whether our conduct is proper?

—

The proper course of conduct is not always obvious. The key is to exercise good judgment. This means following the spirit of this Code and the law, doing the right thing, and acting ethically even when the law is not specific. When we are faced with a situation where we must determine the right thing to do, we should ask the following questions:

- Am I following the spirit, as well as the letter, of any applicable law and policy of Sommet Education?
- Would I want my actions reported in the press or on the Internet?
- What would my colleagues, family, friends, or neighbours think of my actions?
- Could my actions harm any individual, Sommet Education or my institution?

If we are still uncertain, the best course of action is always to seek guidance from the Legal Department before acting.

International trade and anti-boycott

We are careful in our international dealings and comply with all applicable trade laws...

CHECK IT OUT ON MYPLACE

If you have a question or doubt about the legal provisions regarding a specific country, check it out on the Legal page in order to find out more and/or do not hesitate to contact the Legal Department.

Many countries periodically impose restrictions on exports and other dealings with certain other countries, persons, or groups, often because they are believed to support terrorism, narcotics trafficking, or other crimes. Export laws may control trading of commodities, technologies, or services that have the potential to be used for military purposes. Laws also restrict travel to or from a sanctioned country, imports or exports, new investments, and other related transactions.

These laws are complex and subject to frequent change. Those of us whose work involves the transfer of products, technologies, or services across international borders, or who are engaged in enrolling students who reside in other countries, should consult with the Legal Department to ensure compliance with any laws or restrictions that might apply.

WHAT DOES THIS MEAN IN PRACTICE?

“A country where a long-standing supplier is located suddenly becomes subject to sanctions. Should we maintain our business relationship?”

Sommet Education strictly adheres to trade restrictions and financial sanctions. You must always ask the Legal Department to review and approve the matter before entering into or maintaining a business relationship with a partner located in a country that is subject to restrictions.

COMPLIANCE WITH ANTITRUST AND COMPETITION LAWS

We compete fiercely, but fairly. We promote fair competition and follow all applicable antitrust and competition laws...

DO THE RIGHT THING!

If we believe it necessary to meet with a competitor, we must obtain the prior approval from our Legal Department. The contents of any meeting with a competitor should be fully documented. If you are unsure about the legality of a particular action or arrangement, consult the Legal Department.

Antitrust and competition laws are designed to protect consumers and competitors against unfair practices and to promote and preserve competition. Our policy is to compete vigorously and ethically while complying with all applicable antitrust and competition laws in the countries in which we operate. In general, antitrust laws forbid agreements or actions “in restraint of trade”. We all should be familiar with and abide by the general principles of applicable local antitrust and competition laws.

The following examples describe the main prohibited actions:

- **Price fixing:** Sommet Education and another company may not agree to set a fixed price for a particular type of course offering.
- **Limitation of Supply:** Sommet Education and another company may not agree to offer only certain courses or programmes and not offer others.
- **Allocation of business:** Sommet Education may not agree with another company to recruit only from a particular geographic area in return for an agreement from that university to focus on a different area.
- **Boycott:** Sommet Education may not agree with its competitors to refuse to sell or purchase products from third parties. In addition, Sommet Education may not prevent a student from purchasing or using non-Sommet Education products or services.

WHAT DOES THIS MEAN IN PRACTICE?

“My neighbour works for one of our competitors. May we discuss how his company markets and manages its education-related activities?”

You should always avoid any communication with a competitor which might be considered as breach of professional secrecy or an unlawful agreement. Sharing commercial information regarding the business, company strategy, costs, market share, allocation of territories, revenues, supplier terms and conditions, product or service offerings, bids for any contract or program, selection and retention of students, or distribution and marketing methods or channels may cause Sommet Education to be suspected of entering unlawful agreements, so this is formally forbidden.

We do not offer or accept bribes, kickbacks or other improper payments. We comply with all laws that prohibit bribery of government officials and of individuals in the private sector...

CHECK IT OUT ON MYPLACE

You can consult documents that are complementary to this Code on the Corporate Social Responsibility and Legal pages. See in particular the Code of Conduct and Ethics for Suppliers.

CHECK IT OUT ON STANDUP

You can find this topic in our “stand^{up}” programme.

DO THE RIGHT THING!

There is any doubt whatsoever about the nature of a payment, we must consult our manager or the Legal Department.

We have a zero tolerance policy for making or accepting any sort of bribes or kickbacks.

We must comply fully with all anti-corruption laws applicable to our operations, as well as with Sommet Education’s Anti-Corruption Programme and all anti-corruption guidelines and procedures that may apply to our local operations. Penalties for violation of anti-corruption laws can be severe, including heavy fines and imprisonment.

At times we may be tempted to pay a bribe because it seems like the easier way to get things done. And in many parts of the world bribery is commonplace. For Sommet Education, there are never any excuses for paying a bribe or engaging in other forms of corruption. We do not pay bribes, even if it means we may lose money or delay a project.

Furthermore, Sommet Education may not do indirectly, through third parties, what it is not permitted to do directly. We must not allow third parties such as external representatives or consultants to engage in bribery, kickbacks, or other improper payments on behalf of Sommet Education. We must follow corporate due diligence procedures prior to retaining third parties, and monitor third-party activities, to ensure that only third parties who conduct themselves ethically are acting on our behalf.

OUR COMMITMENTS

- Always be aware of the purpose of a payment and ensure that the amount requested is proportionate to the goods or services provided
- Always ask for an invoice or receipt detailing the reason for payment
- Prohibit facilitating payments and inform the Legal Department if any such requests are made
- Let our business partners know that Sommet Education enforces a total ban on facilitating payments

WHAT DOES THIS MEAN IN PRACTICE?

“Bribes can be made for many purposes, for example to:”

- Obtain advantageous tax or customs treatment
- Obtain permits or regulatory approvals
- Bypass laws applicable to the company
- Influence the awarding of a contract or other business transaction

Bribes may come in the form of money, but they can also be anything that is of value to the recipient. For example, gifts, meals, entertainment, business opportunities, scholarships, job offers, and even charitable contributions, all could be bribes if offered for an improper purpose. There is no monetary threshold; a payment of any amount could be a bribe.

Gifts, meals and entertainment

We may give and receive gifts, entertainment, and other business courtesies, but we do so only if consistent with applicable law and policy and without the expectation or appearance of improper influence...

CHECK IT OUT ON MYPLACE

On the Corporate Social Responsibility and Legal pages you'll find the Directive on gifts, meals, entertainment and other Business courtesies, Which contains more detail on the subject, in particular regarding the value of gifts and meals which paid and/or accepted and the method for declaring amounts received or offered.

Gifts, meals, entertainment, hosted travel, and other courtesies are often used to strengthen relationships, but we must never offer or accept such courtesies under circumstances where they could affect, or appear to affect, decision making.

In general, such business courtesies given to or received from suppliers, students, and others outside Sommet Education must be related to a legitimate purpose (for a clear business purpose and not just for those to whom they have been given or for the personal enjoyment of their family and friends) and given or received without expectation of any favourable decision or unfair advantage.

- Business courtesies should be reasonable, infrequent, and modest in amount, as well as consistent with local law, custom, and practice.
- We must never give or receive gifts of cash or cash equivalents in connection with any Sommet Education activity.
- We must never provide to government officials, or individuals in the private sector, gifts, meals, entertainment, or hosted travel in order to obtain or retain any type of unfair advantage.

WHAT DOES THIS MEAN IN PRACTICE?

"I am in the process of selecting a supplier for an important project, and a sales representative for one of the suppliers bidding on the project would like to take me to dinner to discuss the proposal. Is it OK for me to let them pay for the dinner?"

No. A dinner invitation introduces a significant recreational element and would create the appearance of improper influence. Modestly-priced meals are generally acceptable, except in circumstances that you yourself have initiated, for example where you are actively selecting a supplier.

CONFLICTS OF INTEREST

We advance Sommet Education's best interests and avoid any situation in which our personal interests conflict, or even appear to conflict, with those of Sommet Education or our ability to make decisions on behalf of Sommet Education...

DO THE RIGHT THING!

Conflicts of interest can take many forms. Two specific situations that arise (financial interests and outside employment) are described on the following pages. The Code cannot address every potential conflict of interest situation, so we must use good judgment and seek guidance from the Legal Department when unsure.

A conflict of interest arises when our personal activities and relationships interfere, or may appear to interfere, with our ability to act in the best interest of Sommet Education or in compliance with applicable regulations.

This includes any activity that may cause others to doubt our fairness or that competes with Sommet Education. If there is a chance that a situation might be perceived as a conflict of interest, we must disclose it to our manager or the Legal Department and take steps to get it resolved.

Common conflict of interest situations include:

- Having a financial interest in a company that does business with Sommet Education
- Receiving compensation or other incentives from a company that does business with Sommet Education
- Holding a second job that interferes with our ability to do our Sommet Education job
- Hiring a supplier that is managed or owned by a relative or close friend

In addition, many of us have relatives or friends who have business relationships with Sommet Education, our suppliers or competitors. As a matter of precaution, we must disclose any such links to ensure we manage properly any circumstances that might cause the appearance of a conflict of interest.

CONFLICTS OF INTEREST

Financial interests

We avoid investments or other financial interests that could interfere, or appear to interfere, with our ability to make decisions in the best interest of Sommet Education...

We must not:

- Hold a financial interest in any Sommet Education supplier or external representative if we deal with them on Sommet Education's behalf.
- Benefit from any opportunity, including acquiring an interest in property such as real estate or other rights, in which Sommet Education has, or might have, a legitimate interest.
- Take for our own benefit any opportunity in which Sommet Education has a clear interest.

WHAT DOES THIS MEAN IN PRACTICE?

"I have to select a new supplier to provide certain technology services on campus. My cousin owns a technology company that I know will do a good job, and he'll give us a good price. Can I hire my cousin's company?"

—

You should not be involved in the selection process, as it might appear to others that you are favouring your cousin rather than making an objective decision. A contract will be granted further to consultation of 2 or 3 suppliers.

You should notify your manager of your potential conflict of interest and remove yourself from the decision-making process. Others can make the selection decision, and if your cousin's company offers good service at a good price, he will be seriously considered.

CONFLICTS OF INTEREST

Outside employment

If we work outside the company, we ensure that these other duties do not interfere with our ability to perform our job for the Sommet Education...

We must not:

- Be employed by, or receive any compensation from, a Sommet Education supplier or external representative if we deal with them on Sommet Education's behalf.
- Be employed by, or receive any compensation from, any competitor of Sommet Education. The only exception is for part-time faculty who are teaching at other schools, as long as the HR Department is informed in writing.
- Serve as an officer or director of any for-profit company or any higher-education institution outside of Sommet Education without first seeking approval from the HR Department. Approval is not necessary for service in a family-owned business or a professional, community, or charitable organisation, unless the business or organisation is a Sommet Education supplier, external representative, or competitor. Part-time faculty need only seek approval to serve as an officer or director of a higher-education institution.

WHAT DOES THIS MEAN IN PRACTICE?

"I am an accountant, and one of the external representatives with whom I occasionally interact has asked me to do some part-time accounting work for them in the evening and on weekends. I would like the extra money. Can I accept the job offer?"

—
No. Accepting a job from a external representative with whom you interact on behalf of Sommet Education might create the appearance that they are trying to influence your decision making on behalf of Sommet Education.

RESPONSIBLE PARTNERS

We build trusted, long-term relationships with our responsible partners...

CHECK IT OUT ON MYPLACE

You can find the Code of Conduct and Ethics for Suppliers on the Corporate Social Responsibility and Legal pages.

Business relationships with our partners are critical to Sommet Education's long-term success. They are based on the principles of impartiality, integrity, loyalty and good faith.

OUR COMMITMENTS

- Incorporate ethical, social and environmental criteria into the process for selecting our key partners
- Demonstrate transparency and objectivity in procedures governing calls for tender and the selection of business partners
- Respect all laws and regulations in force for all tenders
- Ensure compliance by partners with applicable legislation and the rules of the Code of Conduct and Ethics for Suppliers
- Follow internal procedures before formalising a commitment with a business partner
- Respect commitments made in the context of relations with our business partners and suppliers

WHAT DOES THIS MEAN IN PRACTICE?

"I have selected a new key supplier and am getting ready to put our business relationship on a contractual footing. What should I do to ensure they commit to our ethical approach?"

—

If this has not already been done in the selection process, send them the Code of Conduct and Ethics for Suppliers, establish a dialogue and answer their questions. Set as a condition for the signing of the business contract their written acceptance of the principles of the Code (a copy of the document should be signed and returned).

RELIABLE AND ACCURATE RECORDS AND REPORTING

We ensure that all Sommet Education financial, accounting and non-financial records are accurate and complete...

The accuracy of our financial and non-financial books and records is a critical aspect of what makes us trustworthy. These records are necessary for our internal decision making and form the basis of our reporting to investors, government agencies, and other stakeholders.

OUR COMMITMENTS

We all have a responsibility to:

- Ensure that all Sommet Education records – including not only financial accounts, but all electronic or written records such as student grades and attendance records, expense reports, and time sheets – accurately and fairly reflect the underlying event or transaction.
- Never falsify any document.
- Record all financial transactions in the proper account, department, and accounting period.
- Follow all internal financial controls.
- Raise any concerns about the accuracy of our records with management or through another appropriate channel (see the Implementing the Code section).

WHAT DOES THIS MEAN IN PRACTICE?

“I’ve gone over budget on marketing expenses, but if I delay submitting some of the vendors’ invoices until next quarter, I can cover some of the excess. Is that OK?”

—
No. We must always record expenses in the accounting period in which they were incurred.



IMPLEMENTING THE CODE

The Code of Conduct and Ethics is given to all new employees and is part of the contractual relationship. We all have an obligation to maintain Sommet Education's reputation for ethical conduct and to continue to earn and maintain the trust of all those affected by our activities. This means taking action to prevent violations of the law or this Code.

We respect those who report violations or failures. Any retaliation against a person who honestly raises a concern or takes part in an investigation is a violation of the Code. If we believe someone has been subject to retaliation, we must report the problem.

This section provides details on how the Code is implemented, including on its administration and measures to address potential violations.

WHISTLEBLOWING PROCEDURE

CHECK IT OUT ON STANDUP

You can find this topic
in our “**standup**”
programme.

The overall system set up by Sommet Education through this Code ensures a healthy and ethical framework.

Nevertheless, when the preventive measures have been ineffective and a failure occurs, it is important to:

- detect and analyse as quickly as possible
- bring to the attention of those responsible, at the most appropriate level
- monitor and correct, and the causes eliminated

The identification of failures through the whistleblowing procedure (described hereafter) enables Sommet Education to ascertain, at the highest level, the company's exposure to risks of non-compliance so that appropriate corrective measures can therefore be taken.

Examples of matters that should be reported:

- cases or situations of corruption, conflicts of interest
- misuse of company assets, embezzlement
- bullying, sexual harassment and discrimination (violation of personal integrity)
- behaviour likely to pose a major risk or serious harm in terms of health, environment or safety

THE ANONYMOUS LETTER, A COUNTERPRODUCTIVE IDEA



We understand that you need a lot of courage to be a whistleblower, depending on the situation. For this reason, Sommet Education is determined to guarantee complete confidentiality for all whistleblowers.

Nevertheless, for the purposes of the investigation and to ensure that the process is constructive, it is essential for the alert to be made through the official channel. Therefore, no attention will be given to anonymous letters. They make it impossible to address the problem and impossible to ensure it is properly monitored.

Stages of the whistleblowing procedure

CHECK IT OUT AT MYPLACE

You'll find the report form and the name of the various intermediaries on the Corporate Social Responsibility page.

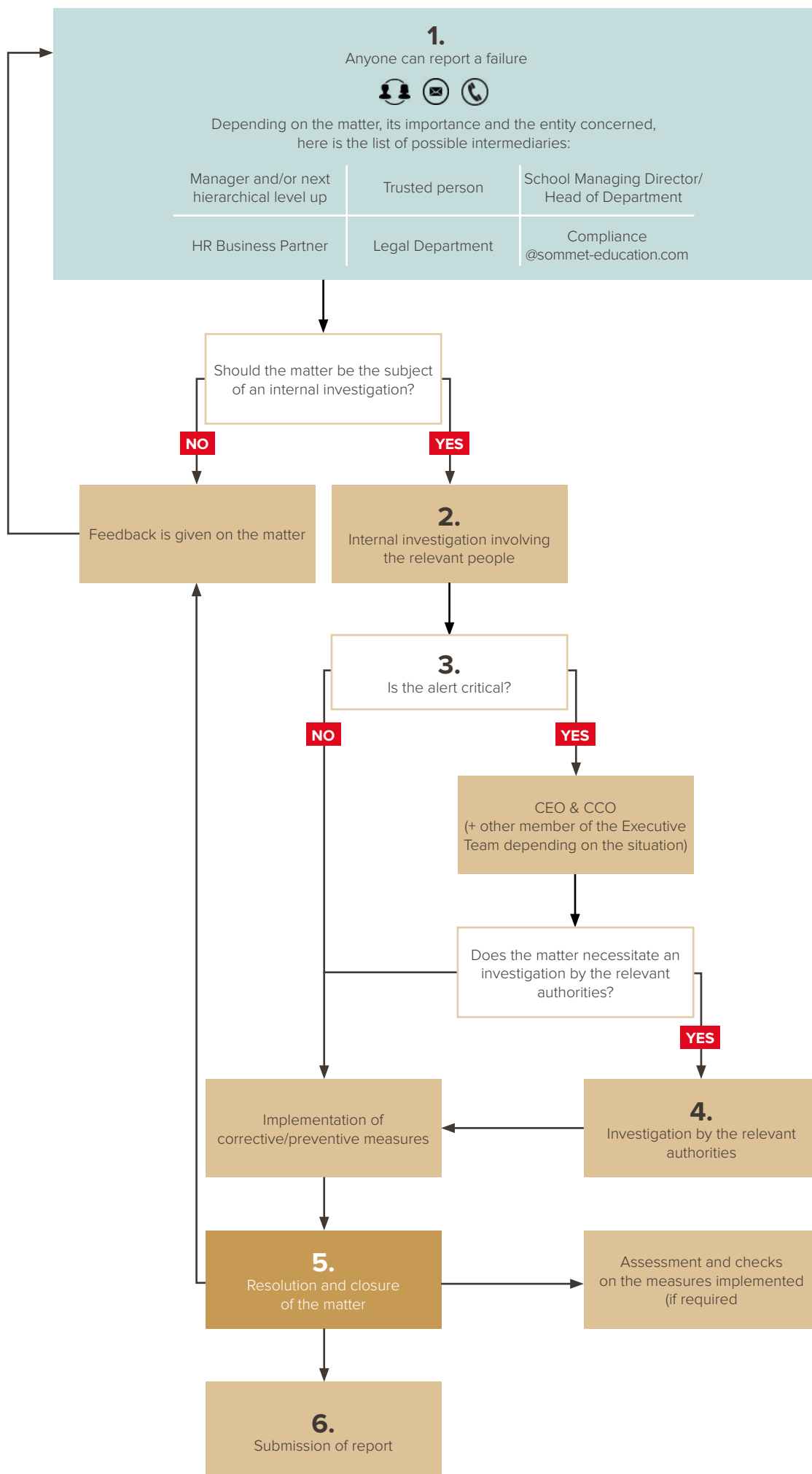
CHECK IT OUT ON STANDUP

You can find this topic in our "stand^{up}" programme.

As shown in the diagram on the next page, the whistleblowing procedure is organised into 6 stages:

- 1. The alert:** Anyone can report a failure or a violation of the Code through the various intermediaries listed in the diagram.
- 2. Internal investigation:** Depending on the nature of the alert, a team involving the relevant people concerned is set up to conduct this investigation. Its members are required to respect the confidentiality of the information discussed.
- 3. Assessment of how critical the matter is:** During this step, which must be completed reasonably quickly, an assessment is made of whether this is a situation that could harm the interests of Sommet Education. If this is the case, the matter is deemed critical and the Chief Executive Officer (CEO) and Chief Compliance Officer (CCO) must be informed immediately.
- 4. Inquiry by relevant authorities:** Depending on the decision of Chief Executive Officer (CEO) and Chief Compliance Officer (CCO), the relevant authorities are informed so that a proper investigation maybe carried out.
- 5. Resolution and conclusion of the matter:** Corrective/preventive measures identified are implemented by the management, bringing the matter to a close. If necessary, regular checks on these measures are made.
- 6. Report:** Any matter that has been brought to a close must be written up using the report form and sent to **compliance@sommet-education.com**. The Executive Team reviews the anonymous summary of all reports at a special meeting held on the subject twice a year.






GOVERNANCE OF THE CODE IN 5 QUESTIONS

CHECK IT OUT AT MYPLACE

You'll find the report form and the name of the various intermediaries on the Corporate Social Responsibility page.



Who is responsible for the administration of Code?

The Code of Conduct and Ethics, which covers both compliance and human resources issues, comes under the joint responsibility of the Chief Compliance Officer (CCO) and Chief People Officer (CPO).

What if I witness or am aware of a violation of the Code?

Talk to one of the intermediaries identified in the whistleblowing procedure.

For information, the address compliance@sommet-education.com is a secure channel available to any employee wishing to report a violation of the Code. Emails sent to this address can only be accessed by Sommet Education's Chief Executive Officer (CEO) and the Chief Compliance Officer (CCO), who, according to the nature of the problem, will take the measures described in the diagram on the previous page.

What if my manager asks me to violate the Code?

You should never violate the Code. Talk about the matter with your manager. You may have misunderstood what you were asked to do, or your manager may have forgotten certain facts or circumstances. If this does not solve the problem, or if you do not feel comfortable talking to your manager, please contact one of the intermediaries identified in the whistleblowing procedure.

If you do something that violates the Code, the fact that your manager asked you to do it would not constitute a defence in any disciplinary action.

What are the penalties for an offence?

Compliance with the Code of Conduct and Ethics is a contractual obligation for all Sommet Education employees. Violations of the Code will entail disciplinary measures that can go as far as the person being made redundant and, depending on the seriousness of the affair, criminal proceedings.

How can I stay informed about any updates to the Code?

The latest updated version of the Code is available on MyPlace. To expand upon certain topics, an information, awareness and training programme called “**stand^{up}**” will gradually be developed and made available on [MyHRCorner](#).

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