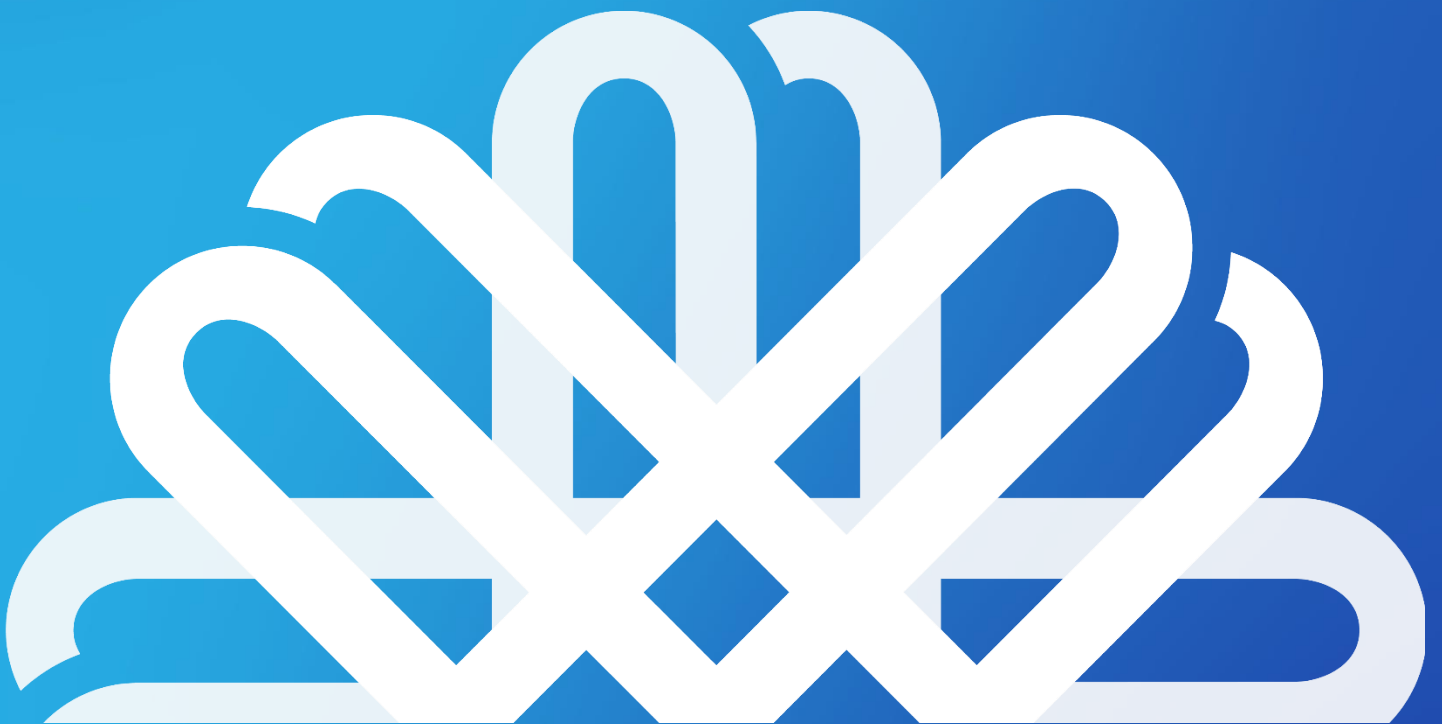


weavenn

**BUSINESS  
CODE OF  
CONDUCT**



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# Our ethical principles in conducting business

Weavenn is committed to behaving responsibly and with integrity.

An ethical approach to business in all circumstances is a guarantee of sustainability and trust from our stakeholders.

Our principles are:

- ☑ To act with integrity and responsibility
- ☑ To comply with laws and regulations
- ☑ To uphold the dignity and rights of all people
- ☑ To protect privacy and personal data
- ☑ To use the company's assets and resources in the interests of the company and its shareholders
- ☑ To observe business confidentiality

## Respect for the individual

### General principles

Weavenn attaches great importance to respecting individuals: it pays particular attention to the laws, regulations and international standards relating to social responsibility, which are designed to protect the safety, dignity and interests of our customers, our employees and the communities with which we interact.

Observance of human rights requires us to be vigilant in our rejection of child labour and concealed or forced labour.

In addition to rejecting all forms of discrimination, upholding the dignity of individuals also involves promoting social diversity and protecting privacy in order to provide each employee with a fulfilling working environment.

The aforementioned focus on the individual naturally entails respect for their environment and the community to which they belong.

## **Respect for diversity and refusal of discrimination**

Discrimination is unequal and unfavourable treatment applied to certain people particularly because of their origin, religion, gender, disability, age or trade union or political affiliation.

Our company encourages diversity, which is a source of human wealth, and seeks to treat everyone fairly.

As such, it rejects all forms of discrimination and is committed to fostering diversity by creating an environment where everyone, whatever their background, has the opportunity to develop professionally and personally.

## **Protection against harassment**

Moral and/or sexual harassment is manifested by repeated and hostile behaviour, words or actions that undermine the dignity or integrity of a person and can lead to serious distress.

Weavenn strives to provide a professional environment where the dignity of each employee is recognised and upheld. The company also relies on the vigilance of each employee to alert their line management or the human resources department in the event of a known situation of moral and/or sexual harassment.

## **Prohibition of concealed or forced labour**

Concealed work is the act of not officially declaring a person who works in the company.

Forced labour is defined as work that is carried out under duress or threat.

Not declaring an employee means depriving them of their rights and depriving the community of the social contributions associated with their work. As we are concerned about the rights of our employees and seek to contribute to the economic and social life of the countries in which we operate, our company is committed to refraining from engaging in undeclared work.

Forcing a person to work violates their freedom and dignity. If Weavenn becomes aware that any of its suppliers and service providers are using employees who are working under duress or threat, it will immediately decline or terminate any relationship with them.

## **Protecting the health and safety of our employees**

Weavenn is committed to taking all necessary measures to ensure the safety and protect the health of our employees.

Our company complies with national health and safety regulations and ensures that every employee adheres to them.

## **Protecting the personal data of our employees and customers**

Our company is committed to maintaining the confidentiality of personal data and will take all appropriate measures to ensure the security and protection of such data. Our company complies with the national provisions of each country as well as with European regulations on the protection of personal data.

Personal data may only be collected for legitimate and proportionate purposes. It may only be used for the purposes for which it was initially collected in the context of transparent disclosure and must not be kept beyond the period authorised by law.

# **Respect for company assets**

## **General principles**

A certain number of legal rules are specifically intended to protect those who place their trust in the company, especially its employees and shareholders.

Some employees, by virtue of the responsibilities or functions entrusted to them, affect the future of the company through their decisions or behaviour.

Respect for the company's collective assets requires them to be particularly vigilant in protecting the social, economic or intangible assets placed under their responsibility.

The trust placed in them calls for strict compliance with the laws or rules relating to the prevention of abuse of corporate assets, insider trading and fraud.

## **Preventing abuse of corporate assets**

The abuse of corporate assets involves making deliberate use of the company's assets, or the powers it has conferred, to the detriment of employees and shareholders, contrary to the interests of the company and/or for personal gain.

To protect the collective assets of the company, our Group is committed to taking all necessary measures, including monitoring, to avoid abuse of corporate assets.

## **Vigilance regarding conflicts of interest**

A conflict of interest arises from a situation where personal interest and the interest of the company collide.

A conflict of interest arises when an employee or one of their relatives or allies is likely to benefit personally from a transaction conducted on behalf of the company, particularly with its customers or suppliers. The same applies if an employee attempts to engage or arrange for the engagement of an enterprise in which he or she or a close relative or ally has a direct or indirect material or moral interest, in particular as a supplier.

Employees are asked to avoid any situation that would suggest that they might put their personal interests, or those of their relatives, ahead of those of the company. Should such a situation arise despite their efforts, they are requested to report it immediately and without reservation to their superiors.

## **Discipline in the preparation of financial statements**

Every company is subject to the obligation to keep rigorous accounts that accurately reflect the nature and amounts of the commercial and financial transactions it carries out. This legal obligation allows the company to give a true account of its activities to its shareholders and to maintain a trusting relationship with them. This obligation is also the corollary of strict compliance with French reporting obligations.

For the record, each employee is responsible for ensuring that any commercial or financial transaction for which they are responsible is documented in accordance with the company's internal rules, properly approved and allocated to the appropriate accounting item so that it accurately reflects the commercial and financial activities.

## **Confidentiality of company data**

A company's confidential information is part of its economic assets. As it is considered strategic, it can be decisive for its development. The communication of such data, whether accidentally or intentionally, can have serious consequences for the company.

The company's employees are aware of the importance of certain data, as specified in their employment contracts, and are asked to take all necessary measures to secure the company's sensitive information.

## **Preserving the reputation and image of our brands on social networks**

Weavenn ensures its presence on "classic" or external social networks.

The company being a joint venture between two companies with a notable reputation, Fnac Darty and CEVA Logistics, this requires everyone to use social media responsibly, both internally and externally.

In this respect, Weavenn's representatives who are expressly authorised to communicate in the name and on behalf of Weavenn's brands on both internal and external social networks undertake to refrain from any behaviour that could harm the collective interest of the company and to ensure the consistency of the messages published.

Furthermore, Weavenn encourages all its employees who express themselves privately on social networks or internal community networks to abide by the principles and value of our company.

In this respect, Weavenn reminds its employees that they are subject to a duty of discretion, confidentiality and loyalty. They must also comply with the law and avoid any inappropriate behaviour.

# Observance of business rules

## General principles

The purpose of business rules is to protect the rights of customers and other economic actors.

Fairness and transparency in our commercial practices guarantee a competitiveness that is based solely on the search for the best products and services at the best price.

Within the company, compliance with business rules is dictated as much by the desire to comply with the law as it is by the desire to demonstrate our commitment to ethical standards in the conduct of our business to our customers and to the shareholders who support us.

## Corruption

Bribery is the act of allowing, proposing or offering, soliciting or receiving, directly or indirectly, any undue advantage, monetary or otherwise, to or from a third party so that the third party, in breach of their obligations, acts or refrains from acting in order to obtain or retain business or any other undue advantage in the conduct of a business.

Our company is extremely vigilant about not tolerating this type of behaviour within the company or in its dealings with third parties.

## Observance of political neutrality

We prohibit political, trade union, cultural or charitable funding with a view to obtaining direct or indirect material, commercial or personal benefits.

We comply with national and international regulations on direct or indirect corruption.



## **Fairness in dealing with competitors**

We believe in free, open and fair competition as a means of economic and social progress, both in terms of prices and the quality and scope of what the consumer and end customer can expect.

Anticompetitive practices aim to reduce or eliminate the principle of fair competition between companies in the same sector.

We strive to comply strictly with the applicable competition regulations in the European Union and in each market where Weavenn operates.

## **Gifts and other solicitations from suppliers and third parties**

The integrity and independence of all employees vis-à-vis suppliers and third parties are intangible principles accepted by everyone.

Every employee is asked to consider whether a gift, invitation or favour received or offered creates an obligation for the recipient to the giver.

The acceptance of these gifts and solicitations is governed by an internal procedure, in particular through the Gifts and Benefits Charter.

## **Facilitation payments**

Facilitation payments are unofficial payments made to facilitate or expedite certain administrative formalities such as permit applications or customs clearance.

Our company does not make any facilitation payments, regardless of whether or not local laws permit them.

## Vigilance regarding the risk of money laundering

Money laundering is an act by which an individual or a company reintroduces money from illegal activities (drug trafficking, tax fraud, corruption, etc.) into the legal financial circuit.

Non-financial businesses can be complicit in money laundering when the sale of a good or service is part of a laundering operation.

With a view to complying with the law on money laundering, Weavenn calls on its employees to pay particular attention to transactions that seem suspicious and to inform their management if they have any doubts.

## Vigilance regarding the principles of fairness and loyalty in our relations with our partners

We require our suppliers to comply with the principles defined in this business code of conduct with regard to respecting persons, goods and business rules.

This code is appended to the agreements and contracts that formalise our business relationship.

The company implements verification procedures and does not knowingly work with partners who do not share these essential principles.

Before concluding any contract, Weavenn ensures the integrity of the partner with which it seeks to establish a commercial relationship.

Furthermore, Fnac Darty ensures that its partners:

- ☑ Are selected according to objective criteria
- ☑ Provide real services that comply with the law
- ☑ Benefit from fair contractual conditions
- ☑ Are free from corruption liabilities in the country of performance

With a view to protecting the integrity and respect for the business rules in all its activities, the company expects its partners to behave with integrity and in accordance with its own principles, in particular those contained in this code of business conduct.

# Dissemination and monitoring of the application of the business code of conduct

## Dissemination of the code of conduct

This business code of conduct is addressed to the employees and partners of Weavenn.

It can be downloaded online from the intranet sites of Weavenn.

## Managing alerts

Any employee or third party may report non-compliance with the rules of conduct set out in Weavenn's code of business conduct. To this end, any employee or third party may exercise their right to alert in a non-biased manner and in good faith via the alert management contact.

Weavenn also undertakes to ensure that no employee is subjected to any form of discrimination, harassment or other reprisals as a result of exercising the right to alert.

The alert management contact is the company's CEO.