

Ensuring that Business Ethics is central to responsible growth

Despite TOTEM is a very new entity, I would like to highlight the Ethics&Compliance topics, which is very transversal and must be central to our growth. TOTEM's Ethics&Compliance approach is totally embedded in the Group Orange's approach, and plays a large part in it: the commitments to respect, integrity, quality of service, and team spirit that shape our code of ethics all guide our professional behavior and ensure we conduct our business responsibly, sustainably, and with respect for people, for environment, and for regulations – in particular by applying the fundamental principle of fair and healthy competition, based on the quality of our offers, services, operations and our customer relations.

As for Orange Group, trust is the cornerstone of our purpose: the trust in our employees, customers, suppliers, shareholders, all our partners and society as a whole. It is built day by day and must be constantly maintained.

Three Compliance officers have been recently appointed for TOTEM (at group and affiliates levels): they are at your disposal on all the subjects linked to Ethics&Compliance. If you have any doubt, feel free to contact them.



Nicolas ROY
CEO of TOTEM GROUP

Our commitments

Commitment to Respect guides our relations with all our stakeholders and must be a permanent part of our business activities and relationships, inside and outside TOTEM, with our landlords, customers, suppliers, partners and competitors. Our commitment in Ethics domain goes beyond compliance with the current rules or regulations.

- Recognition of individual difference must be taken into consideration as we consider it as a wealth for TOTEM company
- We respect differences of origin, ethnicity, culture, age. Family situation, religious beliefs, and support for political or trade-union activities
- We respect individuals and their right to privacy.

Commitment to Integrity leads us to strictly observe our duty of honesty in the exercise of our activities and our relations, by refusing bribery and influence peddling in all their forms.

As a very young company, our will is to build our integrity reputation. It requires us all, and Management in particular, to individually set an example when carrying out our duties "vis-à-vis" our customers, our colleagues, and all other stakeholders.

Commitment to Quality consists in providing our customers and partners with quality service.

Our will is to be acknowledged and endorsed by all our stakeholders as the referent actor regarding the quality of our services and relations: that means that we have to deliver an impeccable service to our customers and to build a high value-added relationship with our landlords.

Quality applies to all our activities, and everyone plays a part and contributes to achieving this objective.

The Team spirit that inspires us also encompasses solidarity and cooperation.

We will combine the best skills for the benefit of our customers, landlords, partners and stakeholders, and together overcome the challenges facing us now and in the future.

Our action and conduct principles are in line with fundamental principles, such as those of the Universal Declaration of Human Rights, and those set out by the International Labour Organization (in particular those regarding the ban on child and forced labour), by the OECD (in particular as regards the fight against corruption), and the commitments which Orange Group embraces, notably in respect of Corporate Social Responsibility, by being one of the first organizations to sign up to the United Nations Global Compact.

Our principles of actions

With all other stakeholders in countries where TOTEM operates

We comply with the laws and regulations in force and respect the natural and cultural environments of the countries where we do business.

In no circumstances do we finance political parties or organizations whose purpose is primarily political. TOTEM does not tolerate corruption.

We promote the use of information and communication technologies to support sustainable development and contribute to the well-being of the local communities in which we operate.

We take steps to be environmentally aware by optimizing our use of energy and other natural resources, and by taking environmental concerns into careful consideration in all our businesses.

Whether we are tasked with a general interest mission or with providing universal service, we undertake to deploy the appropriate resources for fulfilling our commitments.

With our customers and landlords

TOTEM has to build its success on the ability to deliver value-added offers and services that satisfy customers. Ever attentive to customer and landlords needs and expectations, we constantly evaluate and improve our offers and services, the quality of our relations, our ability to innovate and improve our processes.

Our commitment to putting quality and simplicity to work for our customers is the driving force behind every offer that we design and service we deliver.

We understand that concerns and demands with respect to public health and safety are of paramount importance.

With our employees

We believe in the integrity, sense of initiative, accountability, and motivation of our employees. We work to create conditions that are conducive to developing their professional strengths and sense of individual accountability in an environment fostering greater personal initiative. We also aim to develop collective intelligence, a sense of innovation, and team spirit.

Teams are made up of people from diverse cultural and professional backgrounds. We do not tolerate discrimination in any shape or form, especially in hiring and promotion.

We promote a balance between pro and personal activities et respect our employees' right to disconnect.

We expect all our affiliates to establish and enforce procedures that enable employees to report any case of non-compliance with this Code that may come to their attention. In addition, we require that all such reports are investigated appropriately and with due diligence, in strict accordance with applicable laws.

With our suppliers

We actively build lasting relationships with suppliers, based on trust, integrity and respect, to ensure the best possible service for our own customers. We expect our suppliers to abide by ethical standards that match our own, regarding specifically :

- the prohibition of any form of bribery
- the elimination of any discrimination in employment and occupation
- the elimination of any form of forced or compulsory labour
- The contribution to the effective abolition of child labour

With our competitors

We seek to competitively differentiate ourselves through the unimpeachable quality of customer experience based on the quality of our products and services and of our relationships.

We subscribe wholeheartedly to the notion of healthy, fair competition – a key driver of growth and creativity.

We refuse the denigration of our competitors and expect our employees to adopt an exemplary attitude on this point.

The principles of individual conduct

Everyone, from Directors to employees, is expected to demonstrate integrity, respect, impartiality, professionalism and a sense of personal accountability in the performance of the duties and tasks entrusted to them. Everyone who works for TOTEM, no matter what their level of responsibility, is expected to aspire to excellence and continuous improvement in terms of skills and the ability to innovate. Everyone is expected to contribute to creating and maintaining a trusting, productive work environment, and to facilitating performance, initiative and team spirit.

How do I put these principles into practice in my professional activity?

In my relationships with customers and suppliers

Whether a member of Board or of staff, I behave with integrity, quality, and impartiality in my dealings with customers and suppliers.

I refuse any corruptive practice :

- I abstain from engaging in illegal practices of any kind and do not participate in acts of corruption
- I refrain from soliciting gifts or perks, and do not accept anything of more than token value.

If I negotiate agreements with third parties, I take adequate and appropriate measures to ensure that the information provided and representations made are accurate. Moreover, before making commitments that are binding on TOTEM or one of its affiliates, I make every effort to ensure that the technical, commercial, legal and other aspects of the agreement are properly set out.

In case of a conflict of interest

Whether a member of Board or of staff, I avoid situations in which my individual interests (or the interests of individuals or legal entities I am related or close to) conflict with those of TOTEM entities.

If this is unavoidable, I act in accordance with my conscience and with my duty to TOTEM and I inform my manager or the head of human resources or the CCO of my entity, in the event of a possible conflict of interests.

In protecting corporate assets

Whether a member of Board or of staff, I make every effort to protect intellectual property and any and all TOTEM projects and know-how.

I am responsible for ensuring that TOTEM resources are used appropriately and its assets safeguarded, and that waste and misuse are avoided. In using the resources made available to me to do my work, I am expected to act in the best interests of TOTEM and in accordance with the applicable rules.

If I am privy to confidential information in the course of my work or by accident, I take reasonable precautions to ensure that this information remains confidential.

This obligation continues in full force and effect, even if as an employee or member of Board I cease to be employed by TOTEM.

Primacy of TOTEM's fundamental principles

Whether a member of Board or of staff, if I learn that an act of fraud or some other prohibited act has been committed against the Group or one of its affiliates, I am expected to report the matter to my immediate manager, or to my Compliance contact at group or affiliates level.