

## Code of ethics

les éclaireurs, lighting designers  
4 rue terraille, 69001 lyon  
+33 4 78 08 38 57  
[contact@leseclaireurs.net](mailto:contact@leseclaireurs.net)

## Summary

---

Foreword by Lucas Goy, President of les éclaireurs, sas.....	5
Engagement of les éclaireurs collaborators.....	7
1. Our ethical principles in the conduct of business.....	9
Les éclaireurs makes sure that it behaves in an honest and responsible manner. ....	9
The ethical principles we all share are to: .....	9
Les éclaireurs’s ethical principles of business conduct aim to respect the following key international references:.....	9
2. Our principles of business practice and behavior towards our principal stakeholder .....	10
Les éclaireurs employees .....	10
Managers: a key role in respecting our ethical rules and promoting a culture of integrity .....	10
Independence of the industry .....	10
Integrity, loyalty and responsibility .....	10
Respect for human rights and laws.....	10
Un cadre de travail libre de toutes formes de harcèlement.....	11
Non-discrimination, diversity and equality of opportunity.....	11
Well-being at work, work-life balance.....	11
Business confidentiality .....	11
Protection of employee personal data.....	11
Responsible use of company assets .....	12
Reasonable use of social networks and personal websites.....	12
Training and ethics awareness .....	12
Our clients .....	12
Honesty, safety and quality .....	12
Protection of personal and confidential data .....	12
Our business partners and our competitors.....	12
Corruption, influence-peddling, facilitation payments .....	13
Gifts, benefits in kind, entertainment, donations and sponsorship.....	13
Conflicts of interest .....	14
Fraud.....	14
Free Competition.....	14
Commitments by our suppliers and sub-contractors .....	14
3. Supplier charter collaborating or prescribed by les éclaireurs.....	15
4. They share our values.....	17



## Foreword by Lucas Goy, President of les éclaireurs, sas

Placing ethics at the heart of our business conduct is a powerful moral commitment, and the principle of trust is essential to the sustainable development of our business. This culture of integrity is of course based on compliance with laws and regulations, but equally on commitment to the values of our office. It must be embodied by every one of les éclaireurs employees in their daily activities, whatever their nationality, location, position or seniority in the business.

Our Code of Ethics describes the main principles that frame and guide our daily actions.

This Code provides a framework for what is expected from each of us in our professional activities, and when we are in contact with our employees, customers, and business partners. It also defines our commitment to the environment, which we are dedicated to protecting and on which we wish to minimize our impact, and to society at large, in which we intend to fully play our part as a good corporate citizen, engaged and responsible.

The Code of ethics powerfully reaffirms our commitment to respect for human rights, not only for all our employees, but also for all those who work in our supply chains and contribute to our value creation. We mobilize all our energy and vigilance to combat child labor, forced labor, human trafficking and the exploitation of the most vulnerable groups, in particular migrants, as well as to combat all violence and discrimination, especially against women.

This document aims to help us better prevent and detect corruption and influence peddling. It

affirms a shared value within the Business Transparency of les éclaireurs. We practice a zero tolerance towards corruption, influence-peddling and any form of fraud, and it is vital that each and every one of us is aware of this.

Finally, it is particularly important to recall here that the ethical whistleblowing system that les éclaireurs set up, and which enables any individual to report a violation or suspected breach of our Code and its principles, is now available not only to les éclaireurs employees, but also to external and temporary staff working for the Group in all service providers and external partners with whom we have a contractual relationship.

This mechanism is essential, and enables us to identify any possible shortcomings in adhering to our principles, as well as the remedial steps necessary. Protecting those who report such shortcomings to us selflessly, and in good faith, is an essential commitment.

This Code is a guide intended to provide a framework for all our activities, and to protect les éclaireurs, its success and longevity.

I trust that you will familiarize yourself with it and apply it on a daily basis. Everything has been set up within our office to support and help you fulfil this requirement; I am counting on you.

Lucas Goy, président of les éclaireurs, sas.

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.



## Engagement of les éclaireurs collaborators


As members of Les éclaireurs, we are collectively in charge of the conduct of our business and fully aware of our individual responsibility to disseminate, explain and live every day the principles of the Les éclaireurs Code of Ethics, in all of the office's activities, wherever we operate in the world. It is a moral imperative and, beyond that, a guarantee a guarantee of continuity and success for our company.

In particular, it is our individual and collective responsibility to demonstrate every day, through the power of personal example and conduct, the perfect applicability of the ethical principles that frame our management.

Aurélien BOURG



Sara ASCHEI



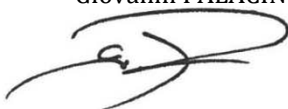
Victoire RICHOUX



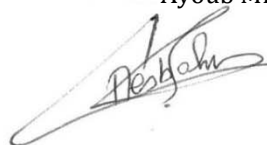
Anaëlle VINÇOT



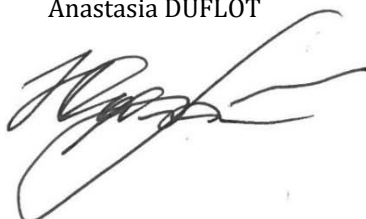
Giovanni PALACINO



Ayoub MESBAHI



Anastasia DUFLOT



Alizée BILLOIS



Sophie VIEILLE



Luca PELLIZZARI



Claire-Lise CABESOS







## 1. Our ethical principles in the conduct of business

Les éclairateurs makes sure that it behaves in an honest and responsible manner.

To take an ethical approach to business in all circumstances is a guarantee of business continuity. Our success and sustainable development in our markets depends on the confidence of our customers, employees, business partners and local communities. This trust is built over time, and must be earned every day.

Ethics in a business environment covers many issues which may sometimes appear contradictory. This is especially true for a company operating across various continents, in countries with different cultures at varying stages of economic development.

However, these differences can be structured around a few simple but powerful shared principles, which should guide our actions in a spirit of responsibility and common sense.

It is organised around two ambitions:

- to set out the ethical principles of our company, simply and methodically,
- to address to all company's employees and, beyond that, to all our stakeholders.

The ethical principles we all share are to:

- act with integrity and a sense of responsibility.
- comply with laws and regulations.
- respect the dignity and rights of every individual.
- act with respect for the natural environment.
- encourage our employees in their community involvement and sustainability initiatives.
- respect business confidentiality.

Les éclairateurs's ethical principles of business conduct aim to respect the following key international references:

- The United Nations Universal Declaration of Human Rights and the European Convention on Human Rights;
- Various International Labor Organization conventions, in particular conventions 29, 105,

138, 182 (child labor and forced labor), 155 (occupational health and safety), 111 (discrimination), 100 (equal remuneration), 87 and 98 (freedom of association, protection of the right to organize and collective bargaining)

- The OECD Guidelines for Multinational Enterprises;
- The United Nations Convention on the Rights of the Child;
- The 10 Principles of the United Nations Global Compact and associated Sustainable Development Goals (SDG);
- The UNGP (United Nations Guiding Principles on Business and Human Rights);
- The United Nations Women's Empowerment Principles.

The application of ethical principles in our daily activities may give rise to questions, and must be constantly encouraged and reinforced by example, an in-depth knowledge of the subjects, training and the right to question.

In addition to the Code of Ethics, which is the foundation and reference framework for the ethical conduct of our company's business, there are other documents whose knowledge and proper application are essential. It is therefore the responsibility of each individual to deepen his or her understanding of the subjects that concern him or her, according to his or her specific responsibilities, via the other internal documents of the company.

Every employee of the company is also required to attend one or more of the mandatory ethics training courses drawn up for all of the company's employees each year.

Each employee must be familiar with the Code and its principles, ask themselves questions before acting, especially if they are unsure of what to do, be vigilant, ask for help if they are unable to resolve the ethical issue on their own, and report any problem or breach of the Code.

We undertake to prevent and penalize any breach of this Code of ethics, and to put in place all the corrective and remedial actions necessary.

## 2. Our principles of business practice and behavior towards our principal stakeholder

In addition to the references listed above, les éclairateurs considers it important to recall and clarify the principles of practice and behavior shared by all of us, and expected of every individual in respect of the different audiences and stakeholders with whom we are in regular or occasional contact.

### **This therefore concerns:**

- the employees of the company
- our customers
- our business partners and our competitors,
- the environment,
- society at large.

### Les éclairateurs employees

Managers: a key role in respecting our ethical rules and promoting a culture of integrity

In order to support all employees in the success of their missions in accordance with the agency's rules and ethical principles, the office's managers have the specific responsibility of embodying the ethical values and principles of the company by their personal example and ensuring that the Code of Ethics is properly applied and respected by their teams. They are the guarantors of the dissemination of key messages and good practices.

They are in the front line to listen and support their teams in case of ethical questions or dilemmas, by encouraging the free expression of their doubts and questions.

We are committed to respecting and implementing the following values and rules in our professional relationships:

### Independence of the industry

In March 2016, we signed the Lighting Designers' Manifesto for Sustainable Lighting Projects. This manifesto commits us to remain independent of industrialists (manufacturers and installers of lighting equipment and energy suppliers) in order to guarantee the quality and sobriety of our projects. Our intellectual services must remain the free expression of an original creative approach. This value of independence is one of the founding values of our company, which is an essential element of the confidence of our clients and of our reputation. Thus, we do not accept any back margin or retro-commission: only the contract that binds us to our client is our remuneration on a project.

### Integrity, loyalty and responsibility

We have an obligation to act with integrity, loyalty and a sense of responsibility. In particular, we will ensure that we do not get involved in situations that could prove to be fraudulent (corruption, conflicts of interest, misappropriation of assets, communication of fraudulent information etc.) or malicious.

In general, in our daily actions associated with our professional activities, at our usual place of work or when we are travelling on business, we will ensure that we respect the ethical principles of the office, safeguard the interests and the image of the company les éclairateurs.

### Respect for human rights and laws

We owe our colleagues and staff respect and fair treatment, and the guarantee of a motivating work environment which respects the dignity and rights of all individuals, fostering development and well-being. We will promote a human resources policy that contributes to professionalism, motivation and job satisfaction for all by offering opportunities for training, mobility and internal promotion, and by developing the employability of each individual.

We provide a working environment that respects human rights and labor laws, and complies with laws and regulations on the environment, health and safety in all the countries in which we operate.

We ban child labor and forced labor.

We encourage freedom of expression for employees of the company.

We encourage dialogue and respect the free exercise of unions' rights within the context of local laws and regulations.

### Un cadre de travail libre de toutes formes de harcèlement

Les éclaireurs does not tolerate any sort of harassment, discrimination, intimidation, bullying or humiliating behavior, whether psychological, sexual or constituting an abuse of power. It is the responsibility of every individual not to behave in a way that could harm the dignity and rights of others.

Harassment means any repetitive voluntary pattern of hostile, abusive or humiliating behavior, whether in the form of verbal comments, actions or gestures which jeopardize the dignity or psychological well-being of a person and which cause a deterioration of the working environment.

It may take multiple forms (degrading, offensive or obscene comments, rumor or ridicule, threats, requests to perform demeaning tasks, excluding and isolating people, etc.).

In particular, sexual harassment is intimidation or coercion of a sexual nature and the undesirable or inappropriate promise of reward in exchange for sexual favors. It may include a series of actions ranging from minor transgressions to sexual abuse or sexual assault.

Harassment may be subject to disciplinary penalties, and in many countries to criminal proceedings.

### Non-discrimination, diversity and equality of opportunity

At les éclaireurs, we believe that diversity is a source of creativity and innovation, and therefore of economic performance. We are careful to develop an inclusive approach in which all differences are taken into consideration, so that everyone is given the opportunity to be themselves. This is why we take care to spread a culture of equality at all levels of the organization and offer our teams an open and stimulating work environment, free from any discrimination, which contributes to our success. We promote equality of opportunity and treatment.

Within this context, we affirm our commitment to greater diversity and gender parity in all roles and positions, and at all levels in the company hierarchy, in particular by putting an end to the

waste of female talent through the whole chain of command.

### Well-being at work, work-life balance

To ensure a good work-life balance for its employees and the well-being of everyone at work, Les éclaireurs seeks to facilitate a favourable, caring and efficient working environment. To this end, Les éclaireurs implements policies and measures to facilitate the daily life of each employee and improve the quality of life at work.

### Business confidentiality

In their daily exchanges and interactions with internal or external stakeholders, all employees undertake to:

- protect business confidentiality by respecting agreements signed and the principles of confidentiality prohibiting any unauthorized disclosure;
- strictly limit the disclosure of information exclusively to the persons concerned and duly authorized;
- keep and protect all confidential data for which they are responsible;
- pay particular attention to written and/or verbal information disclosed in public spaces

### Protection of employee personal data

We have always recognized the value of our employees' data, and as such, we respect and protect their privacy. To this end, all employees of les éclaireurs benefit from the following rights:

- fair and transparent information before any new processing of data, and prior consent if appropriate,
- right to object to processing if there is a legitimate interest,
- right to access and correct data,
- access to their data is limited to a restricted number of people,
- right to be forgotten after they have left the company, provided the necessary conditions have been met.

Operating in both the public and private procurement sectors, and for projects covered by defence secrecy or state interests, some of les éclaireurs's employees may have data with a potentially high market value. Aware of the risk of misuse of this data, Les éclaireurs is also committed to strengthening its security.

## Responsible use of company assets

Every employee undertakes to avoid the misuse, waste or inappropriate use of all the company's resources. In particular, for all material resources (telephone, vehicle, computer, etc.), all employees undertake to comply with the rules for their use of which they have been informed. For intangible resources (internet, email, etc.), personal use may be tolerated on an occasional basis, provided it does not adversely affect correct performance of professional activities.

## Reasonable use of social networks and personal websites

We encourage staff to be ambassadors for the company. However, only the persons duly authorized to do so within les éclairieurs may communicate on behalf of the company. Talking about the office is permissible, but not on behalf of les éclairieurs.

Every employee represents the professional values of the company in the public and private sphere, including on social networks and personal websites. We therefore have an obligation to act with integrity and professional discernment when we express our views on subjects that are directly or indirectly connected to the company, in order to preserve les éclairieurs's image and reputation. We must ensure that there is no possible confusion between our opinions and personal interests and those of the company.

For this reason, employees acting under their real identity, or whose identity is associated with their place of work on social networks and discussion forums, must mention that they are acting on their own behalf and that their views do not reflect the image or the stance of the company on the topics addressed.

## Training and ethics awareness

Training and ethics awareness programs are available to all employees. This program, which is renewed every year, gives everyone the tools to understand what is expected of them and to guide their actions in full compliance with the company's ethical principles by the use of specific scenarios and relevant examples. Attendance is compulsory.

## Our clients

### Honesty, safety and quality

We provide our customers with the very best professional service to ensure that they are satisfied and to earn their trust.

Les éclairieurs designs lighting projects and recommends products or services that comply with the standards and regulations in force in terms of quality, safety and industrial and intellectual property, and provides transparent, reliable, fair and quality information.

Our commercial or advertising communication is based on sincerity, loyalty to our past and future clients.

### Protection of personal and confidential data

Our customers retain the power to make decisions about the information that they entrust to us, and we ensure that the confidential nature of their private data is preserved by respecting the commitments we have made to them and in accordance with applicable laws.

We respect the right of individuals to retrieve, correct or erase data, and use back-up devices (both physical and digital) for the data collected. Les éclairieurs recognises the value of the data that its clients and contacts have entrusted to it.

Operating in both the public and private sectors, and for projects covered by defence secrecy or state interests, some les éclairieurs employees may have data with a potentially significant market value.

Aware of the risk of misappropriation of this data, les éclairieurs has not only worked to comply with the General Data Protection Regulation, but also to ensure the best possible protection for its clients' data. In order to protect itself as much as possible against the risks of data misappropriation, the company has put in place the necessary confidentiality policies with its customers, its employees, its various departments and entities and with its suppliers and commercial partners in and outside the European Economic Area.

## Our business partners and our competitors.

We are committed under all circumstances to fair, and equitable business relationships.

Les éclairateurs publicizes its ethical principles which must guide the conduct of business by its employees, as well as by its business partners, particularly in regards to compliance with laws and regulations, the prevention of any form of corruption, including influence-peddling, and conflicts of interest.

In 2021, Les éclairateurs will make full compliance with its Code of Ethics a prerequisite for its external prescriptions and collaborations.

### Corruption, influence-peddling, facilitation payments

Les éclairateurs strictly prohibits corruption in any form whatsoever, including influence-peddling, and intends to prevent it by complying with the anti-corruption laws applicable in each country in which the Group operates, in particular: applicable French legislation (as amended by the Sapin II law), Italian law, the Foreign Corrupt Practices Act of the USA and the Corruption Act of the United Kingdom.

Les éclairateurs exercises zero tolerance in this respect.

Active corruption consists of illegally offering or promising an advantage to a person at any time, whether directly or indirectly, which is aimed at inciting that person to act or refrain from acting.

The concept of passive corruption refers to the situation of the person corrupted. Corruption is subject to criminal penalties, whether the person corrupted works in the public or private sector. "Offering an advantage" means offering anything of value (money, of course, but also for example vouchers, various kinds of invitation, gifts, donations, job promises, reimbursement of travelling expenses, etc.)

As far as "influence-peddling" is concerned, this consists of offers, promises, donations, gifts or advantages of any kind offered directly or indirectly to a person for themselves or for another person, to encourage them to abuse, or because they have abused, their real or assumed influence for the purpose of obtaining distinctions, jobs, contracts or any other favorable decision from a public authority or public administration.

We ban facilitation payments throughout the company, which means the payment of an unofficial sum of money with the aim of facilitating, guaranteeing or speeding up the execution of an administrative decision.

Financing of political organizations, unions, cultural or charitable organizations in the name of or on behalf of les éclairateurs for the purpose of obtaining material, commercial or personal advantage, whether direct or indirect, is also totally prohibited.

### Gifts, benefits in kind, entertainment, donations and sponsorship

Every employee must ask himself or herself the question as to whether a gift, favor or invitation, whether received or offered, is intended by the person offering it to influence the person receiving it.

Les éclairateurs employees and business partners must never promise, offer, give, request or accept goods or services such as gifts, services or entertainment for the purpose of obtaining an advantage or exerting any influence whatsoever.

As an example, it is reminded that in France, these gifts may constitute an offence of corruption punished by Article 445-1 of the French Penal Code (imprisonment and/or fine of up to 375,000 euros) if this advantage is not related to the activity, its value is disproportionate and it aims to obtain a consideration contrary to professional practices and/or obligations (volume of orders exceeding the distributor's real needs, excessive product promotion by crowding out competing products, etc.).

Operating as a lighting solution advisor, les éclairateurs aims to be exemplary in this area, in order to maintain the full confidence of its customers, and therefore has zero tolerance in this regard.

Soliciting, accepting or encouraging gifts from current or potential suppliers, customers or partners may result in a conflict of interest or even an act of corruption.

As the value of gifts alone does not allow one to conclude that a conflict of interest or an act of corruption exists, each employee is asked to be transparent with his or her hierarchy and to be vigilant as to the reason for and legitimacy of the offer.

Similarly, donations and sponsorships must be transparent, duly justified, accredited by management and will be subject to a declaration of public interest. Any proposed donation to a charitable organization must have been previously audited and approved by management.

In case of doubt, the employee should contact his or her line manager and consult the applicable local procedures.

### Conflicts of interest

Les éclairateurs employees must not place themselves in situations where their personal interests or those of their family or friends could diverge from the interests of Les éclairateurs, or could compromise their independent judgment, their professional integrity, or the image or reputation of Les éclairateurs. This is known as a conflict of interest situation.

The following situations may give rise to a conflict of interest and should be avoided as they are contrary to the best interests of the company:

- working, even on a volunteer basis, for a third party with interests divergent from those of les éclairateurs.
- maintaining personal, financial or commercial interests and fostering situations which could interfere with the actions and/or the decision-making of the company les éclairateurs
- maintaining inappropriate working relationships with immediate superiors or subordinates.
- Re receiving gifts or invitations which could influence personal judgment.
- influencing the selection or choice of a service provider for furthering personal interests or those of close relatives.

If an employee is faced with the risk of a conflict of interest, he or she must immediately inform their direct or indirect superior, or any other authority or management and refrain from interfering in the relations that Les éclairateurs maintains with the third party concerned, until a solution has been found.

### Fraud

Fraud generally refers to an act of deception against an individual or a company in order to incite the person or company to supply money, goods or other major resources (such as valuable information) illegally.

Frequent examples of fraud cover:

- forgery;
- identity theft;
- falsified or fraudulent bank transfers;
- cyber-attacks.

Fighting fraud is an essential ethical undertaking for the proper conduct of our business, and

constant vigilance is required. Any fraudulent act is reprehensible, and disciplinary measures can be taken.

### Free Competition

Competition law is intended to guarantee that all companies engage in fair competition in order to offer high-quality products and services at the best prices. We believe in free, open and fair competition as a factor of economic and social progress, both in terms of price and in terms of quality and scope of supply, in the interest of our public and private clients, the states and their citizens for whom we work. We intend to strictly comply with the applicable competition regulations wherever Les éclairateurs operates.

### Commitments by our suppliers and sub-contractors

Respect for human rights and fundamental freedoms are les éclairateurs's core ethical commitments and must be upheld by all of its employees and stakeholders. To this end, our Code of ethics draws on major international references on ethics and human rights.

We require our suppliers to comply with the principles set forth in this Code of Ethics, as well as in the Supplier Charter prescribed by Les éclairateurs.

We prohibit child labor and forced labor. Les éclairateurs carries out checking procedures and does not knowingly work with partners who do not share these essential principles at the heart of their businesses and in the choice of their own service-providers.

This will allow Les éclairateurs to ensure that its key suppliers are regularly evaluated.

In addition, Les Éclairateurs will initiate a Sustainability Principles process, which will be systematically communicated to all suppliers with whom the company has a contractual relationship, and which will include all the fundamental principles and guidelines that complement and specify the main principles of the Supplier Charter.

Our commitments to our suppliers and sub-contractors are in line with the requirements to respect human rights published by the United Nations and stated in the United Nations Guiding Principles on Business and Human Rights (UNGP).

### 3. Supplier charter collaborating or prescribed by les éclaireurs

Les éclaireurs declare their commitment to respecting human rights and fundamental freedoms, to the provisions of the International Labor Organization (ILO) and in particular to the conventions on the eradication of child labor and the abolition of slavery and forced or compulsory labor, and protection of the environment. Our company moreover wishes to emphasize its defense of the 10 principles of the Global Compact

As such, Les éclaireurs requires the suppliers it prescribes or with whom it collaborates to commit to the following fundamental principles, which together constitute the Charter for Suppliers collaborating or prescribed by Les éclaireurs:

- To prohibit work by children under 15 years of age, except where the ILO exemption clause which permits work by children over 14 years of age applies;
- To prohibit recourse, in whatever form, to slavery, human trafficking, debt bondage and the use of forced or compulsory labor, and to products or services created by these means;
- To pay particular attention to categories of workers vulnerable to exploitation, in particular migrants, by guaranteeing them non-discriminatory recruitment and employment practices, freedom of movement and remuneration, whilst ensuring that they have a good understanding of their rights;

The term “forced or compulsory labor” means any work or service required of an individual under threat of any kind of penalty or without remuneration, and for which the work is not supplied willingly. The unlawful practice of child labor or forced or compulsory labor constitutes an element that would nullify any business relationship between les éclaireurs and a business partner.

- To prohibit any type of work which, by its nature or the conditions in which it is carried out, is likely to compromise health, safety, integrity or morality (clean and safe premises, access to drinking water, sanitary facilities, etc.);

- To prohibit any behavior contrary to dignity and well-being at work, especially any practice contrary to labor regulations and in particular concerning remuneration and the right to a living wage, working hours (maximum working hours, breaks and rest periods) and working conditions;

- To respect employees’ directly applicable right of representation and free speech, freedom of association and collective wage bargaining;

- To prohibit all forms of discrimination, in particular racial, ethnic and gender discrimination or that are associated with disability, and to foster working conditions that promote diversity;

- To prohibit all forms of psychological harassment, notably sexual harassment, in particular any form of intimidation, threat or coercion of a sexual nature or any promise of recompense in return for sexual favors;

- To treat all men and women equally, fairly and respectfully at work, paying particular attention to the eradication of all forms of intimidation, harassment, violence or unequal treatment, especially with regard to women’s pay.

- To comply with directly applicable environmental regulations and, over and above this, to endeavor to implement the three principles of the Global Compact relating to environmental protection:

- Apply a precautionary approach to environmental problems;
- Undertake initiatives aimed at promoting greater environmental responsibility;
- Encourage the development and diffusion of environmentally-friendly technologies.

- To disseminate and renew as often as necessary the principles of this Charter in an appropriate way to all its employees, in all the languages and with all the means necessary to guarantee that it is properly understood by all, and to communicate the whistleblowing procedure which exists within the company les éclaireurs;

- To take appropriate steps to effectively apply the principles of this Charter to its own suppliers and sub-contractors ;
- To alert les éclaireurs loyally to any serious difficulty in applying this Charter, or any significant infringement of it.

Before any legal entity in les éclaireurs enters into any contractual relationship for the procurement of goods and services, representatives of les éclaireurs, possibly accompanied by external observers, shall have unrestricted access to administrative documents, staff and production, packing and transport sites for the products or services to be contracted in order to assess correct compliance with the conditions of this Charter.

These inspection visits may be repeated as often as is deemed appropriate. These visits shall be the subject of assessment reports according to strict criteria. Les éclaireurs reserves the right to circulate these reports as appropriate.

Over the course of the contract, representatives of les éclaireurs, or an external partner commissioned by our company may, without prior notice, check that suppliers are complying with the undertakings contained in this Charter.

The supplier must facilitate access to all administrative documents or persons, and to the workplace and living accommodation.

Operating as a lighting solution prescriber, Les éclaireurs declares that it aims to be exemplary in terms of corruption, influence peddling, and the prohibition of facilitation payments, in order to maintain the full confidence of its clients. It prohibits all gifts, benefits in kind, entertainment,

donations and sponsorship. It also has zero tolerance in this respect.

In this respect, any supplier working with Les éclaireurs is informed of its Code of Ethics, and affirms that it has full knowledge of it and subscribes to it without reservation.

For any contractor or commercial partnership, compliance with this Charter constitutes, notwithstanding any contractual clause, a substantial condition of the commercial relationship.

In the event of significant non-compliance with this Charter, Les éclaireurs will determine what corrective measures should be put in place to allow for the continuation of commercial relations, if any. In general, the company les éclaireurs will provide support and advice to any supplier to improve its practices in order to meet the objectives of this Charter.

Finally, Les éclaireurs expects its suppliers to respect and act in full compliance with local and international legislation, particularly with regard to business law and taxation.

I undersigned.....  
 fully entitled to engage my company  
 .....  
 commit myself to respect the Charter of the suppliers collaborating or persecuted by Les éclaireurs and to conform to its Code of Ethics.

Date, stamp and signature



## 4. They share our values

Wila	Flos	Sunlux
Idelum	Selux	Robe
Iguzzini	XAL	Lumenpulse
EPIC lighting	Ambiance Lumière	TMC innovation
Derksen	Teclux	Eclatec GHM
Lumenscia	Meyer	3F-Filippi
Algam	Comatelec Schreder	Targetti France
Luxiona	We-Ef	Valmont
LEC	Flux Lighting	Technilum
Lumenpulse	Delta Light	Sammode





