Sotrad sprl

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Sotrad CSR Policy

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SCOPE AND OBJECTIVE 2

VALUES 2

SOTRAD SOCIAL RESPONSIBILITY 2

ENSURING EXCELLENT WORKING CONDITIONS 2

ENSURING HEALTH AND SAFETY 3

CARING FOR THE ENVIRONMENT 4

OPERATING FAIRLY 4

PROTECTING CONFIDENTIAL INFORMATION 5

INVOLVING SOTRAD IN THE COMMUNITY 6

APPLICATION 6

COMPLIANCE 6

IN CASE OF BREACH OF THIS CODE OF CONDUCT 7

ANONIMITY 7

SERIOUS INCIDENTS 7

SCOPE AND OBJECTIVE

One of the SOTRAD's ambitions is to become a leader in conception and supply of IT equipment and Global Telecom Solutions in Africa.

This CSR policy acts as a non-exhaustive framework of reference and is applicable worldwide, in every SOTRAD business entity, SOTRAD subsidiary and all companies subcontracted to carry out work on behalf of SOTRAD.

It aims to ensure that all individuals acting in the name or on behalf of SOTRAD conduct their activities in accordance with SOTRAD's values, ethical requirements, laws and regulations applicable in the countries in which SOTRAD is present, in order to develop a responsible way of work and a positive impact.

By doing so, SOTRAD will develop and maintain a relationship of trust with all its relevant stakeholders: clients, employees, users, business partners, shareholders, authorities and the general public.

VALUES

SOTRAD attaches a great importance to the impacts of its activities on people and the environment and is committed to assume fully its responsibilities towards Society. Conscious of the human and development impacts of the access to Internet and modern technologies in Society, SOTRAD's ambition is to bring a positive contribution to the socio-economic growth of the African countries through its various business activities.

SOTRAD's values serve to harness the enterprising spirit of its people in a responsible way:

- Service: we only want satisfied clients
- Respect: we value our people and team work
- Integrity: we act with integrity and in accordance with applicable rules.
- Impact: we make a positive difference daily

SOTRAD SOCIAL RESPONSIBILITY

ENSURING EXCELLENT WORKING CONDITIONS

Employees are SOTRAD's biggest asset. SOTRAD aims to provide them with a safe, secure and healthy working environment, where they are able to reach their full potential. SOTRAD offers them training and development opportunities.

SOTRAD has the deepest respect for essential rights at work, as stated in the ILO fundamental conventions and the OECD guidelines for multinational enterprises. SOTRAD upholds the principle of

equality of opportunity in the workplace and is committed to ensuring that every individual is treated fairly and with respect, regardless of sex, race, sexual orientation, age, disability, religion or ethnicity.

SOTRAD offers every employee the opportunity to discuss any work-related problems in complete confidentiality.

Every member of staff and SOTRAD representative shall behave in an exemplary manner when working and communicating with others. This includes respecting foreign cultures and customs, within the boundaries of international norms of behaviour.

Provided the law, local regulations and the company's code of conducted are respected, and there is no conflict of interest, employees are free to engage in social and political activities.

In SOTRAD's sphere of influence too, SOTRAD supports and upholds the principles set out in the Universal Declaration of Human Rights and the fundamental conventions of the ILO.

SOTRAD will prevent and forbids the use of child labour or forced labour on its sites or those of its business partners (clients, suppliers, subcontractors).

SOTRAD will take firm action against any employee who commits or is complicit in any of these acts.

ENSURING HEALTH AND SAFETY

SOTRAD requires that its management not only ensure compliance with all applicable health and safety laws and regulations, but also apply operational safety best practice. Management must also ensure that staff receives appropriate training on health and safety and the risks inherent in their work or workplace.

SOTRAD shall take care to provide its employees with safe and secure working conditions and equipment, to ensure they can complete their tasks correctly and efficiently.

The staff shall also be made aware of the importance of checking, maintaining and storing their equipment correctly, observing safe working practices and reporting any potential risks and near misses, in order to increase safety in the workplace.

SOTRAD recognises the need for work-life balance. In order to respect employees' private life, SOTRAD only retains personal information permitted by law, or that which is necessary to the running of the business. SOTRAD pays attention to rest and avoids excessive workload and working hours.

CARING FOR THE ENVIRONMENT

SOTRAD makes efforts to be a responsible and environmentally conscious business. SOTRAD monitors the environmental impacts of his products and services, in order to buy and offer the best available alternatives to business as usual.

SOTRAD carries out its activities in accordance with the applicable environmental laws and regulations in the countries where he works. SOTRAD is constantly working to improve its recycling process, reduce its emissions and waste, ensure it uses raw materials and energy resources in a responsible manner.

SOTRAD identifies suppliers who are committed to respecting environmental standards, evaluating their practices and products on a regular basis through environmental due diligence prior to acquiring or hiring any new services and material.

OPERATING FAIRLY

With suppliers and subcontractors

From the selection phase to payment, SOTRAD's relationship with its suppliers and subcontractors is based on respect, loyalty and honesty. SOTRAD shall ensure that its ethical code of conduct influences the behaviour and quality of all actors of its value chain.

SOTRAD reserves the right to operate due diligence audits of its suppliers regarding human and labour rights in the supply chain.

With competitors

SOTRAD believes in free enterprise and applies the principles of fair competition. In order to promote continuous growth and generate profit in the long term, SOTRAD will always present its products and services in an open and honest manner. SOTRAD wishes to remain a tough yet honest competitor, and will therefore never make gratuitous or baseless comments about the products and services of its competitors.

In the event of acquisition, suspension of activities or the creation of a joint venture, SOTRAD will check whether it needs to provide the regulatory bodies with information required to obtain regulatory approval, in accordance with competition legislation.

SOTRAD respects all laws prohibiting agreements or arrangements with competitors designed fix prices and terms of sale, coordinate tenders or share potential clients.

With clients, contacts and prospects

SOTRAD and its employees will not offer or accept any unlawful payments or presents to or from a third party. SOTRAD will induce tempted parties to quit this behaviour.

Any person receiving a gift in the context of their role within the company shall notify its manager immediately. Any gift that is offered or received must be of symbolic value, permitted by law and have a legitimate business purpose.

Under no circumstances shall a gift be given with the aim of directly or indirectly influencing the outcome of a business deal or the integrity or independence of the recipient.

SOTRAD and its staff shall not make any kind of donations to, or support in any kind of direct or indirect manner, any third party, with the intention of influencing a business decision by way of corruption or obtaining a commercial advantage.

PROTECTING CONFIDENTIAL INFORMATION

Disclosure of information

SOTRAD strongly believes that effective, open communication plays a key role in gaining the trust of its shareholders, employees, suppliers and local communities. SOTRAD is open to communicate on its social and environmental impacts.

SOTRAD is committed to communicate information in accordance with the applicable laws and regulations and to ensure that the information released is accurate and available to all the relevant shareholders, individuals and organisations.

SOTRAD is at the crossroads of considerable information passing on its broadband and servers. Employees are required not to communicate and to keep confidential any information strategic to S

SOTRAD's business or related to its clients to which they have access during their period of employment. This type of information must not be divulged to anyone, including family members.

This absolute confidentiality rule remains valid once an individual's contract has ended.

Accounts and document management

"Document" refers to both paper documents and documents in electronic form, including emails.

SOTRAD requires complete transparency in all its financial operations and therefore takes a highly rigorous approach to its financial documentation. All accounting books shall be maintained in accordance with the applicable laws and regulations. They shall convey an accurate and honest reflection of SOTRAD's assets, liabilities, revenue and expenditure, to an appropriate degree of detail.

No document may contain data that is incorrect or has been falsified or concealed. Any employee found to be complicit in the falsification or concealment of data shall be subject to disciplinary measures up to and including dismissal.

In the event of an investigation or legal proceedings initiated by or against an entity or member of staff within the group, all documents related to the case shall be retained, even when the destruction date has been reached.

Usage and protection of technological resources

All technological resources, including computers, voice messaging systems, email and internet access must be used in accordance with the code of conduct and other SOTRAD rules. They must be used for professional purposes and in a manner that respects both the law and other people.

All employees with access to SOTRAD's IT systems shall take all the necessary precautions to prevent any unauthorised access and shall save their passwords and access codes in a safe place.

Employees may not copy software belonging to SOTRAD, nor install software or use equipment for which SOTRAD does not have a licence.

SOTRAD does not monitor emails, voice messages or intranet communications, but reserves the right to do so in certain circumstances.

INVOLVING SOTRAD IN THE COMMUNITY

SOTRAD aims to be a good neighbour in all the areas where it operates and encourages its employees to take part in voluntary activities that make a positive contribution to local communities and society needs.

SOTRAD develops a charity policy that privileges causes related to its core business and actions that enables its expertise to be beneficial to Society, for instance in education in technical or electronic skills. SOTRAD offers ad hoc support to this type of community projects.

APPLICATION

COMPLIANCE

SOTRAD expects all members of its staff to behave in an ethical and responsible manner, complying with both the spirit and the letter of this code, and respecting its application throughout the Group.

All persons acting in the name or on behalf of SOTRAD—including temporary staff—must agree expressly to abide by this code of conduct.

The code of conduct shall be made available to every member of staff and be part of the contractual relationship. The management shall ensure it is integrated into staff training programmes, and shall promote it and ensure it is respected.

The code may need to be adapted in some areas, in line with local requirements. Any adaptations shall be made in accordance with SOTRAD values.

This code does not cover everything. If anything is unclear or creates uncertainty, SOTRAD encourages the reader to speak to his/her HR manager and ask as many questions as necessary.

IN CASE OF BREACH OF THIS CODE OF CONDUCT

Both SOTRAD partners' reputations and their trust in SOTRAD may be jeopardised by inappropriate behaviour, negligence and irresponsible or illegal acts on the part of suppliers, subcontractors and employees.

SOTRAD therefore requests that its employees, subcontractors, clients and suppliers quickly report any behaviour or actions that they believe contravene this code of conduct. The problem may be due to a structural error or incorrect interpretation of the text, rather than any intention or desire to cause harm. The information received may help the management avoid further problems in the future, or prevent the situation from escalating.

ANONIMITY

Any issues raised will be subject to a confidential enquiry. SOTRAD promises to preserve the anonymity of any person wishing to reveal actual or foreseeable malpractice or questionable practices that do not respect the law, violate the group's behavioural norms or this code or that are intended to cover up environmental damage or damage to human health and safety.

The information will be communicated to the relevant HR manager or the General Manager. If you prefer to speak to someone from outside the group, you can get in touch with the Corporate Controller. The notified person will consider what should happen next, taking into account the need to preserve the whistle blower's anonymity. In the event of legal proceedings, it may not be possible to guarantee full anonymity.

Be aware that false or malicious allegations may constitute serious professional misconduct and could result in disciplinary action.

SERIOUS INCIDENTS

Measures may be taken to prevent the occurrence and recurrence of any behaviour or actions that contravene the rules set out in this code of conduct, in accordance with applicable legislation.

Any serious incidents shall be immediately reported to the General Manager, who will then inform the Chief Financial Officer & Company Secretary, regardless of whether SOTRAD or a member of SOTRAD staff was responsible.

The parties that are found guilty may be subject to internal disciplinary measures, dismissal and/or legal proceedings, in addition to the application of all related legislation.

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