

CODE OF ETHICS

Not only does this Code supplement the relevant laws and regulations that govern us and our business, it should also encourage everyone connected with DASA Umbrella and the wider company (The DASA Group) to conduct themselves in an exemplary fashion worthy of DASA employees. For the avoidance of doubt the DASA Group refers to DASA Umbrella, DASA Consulting, DASA Accountancy, DASA CIS and DASA Rewards.

It pertains to all members of the DASA Group, irrespective of their rank, job or country in which they work.

It summarises the fundamental values of our company, which we are all bound to protect and uphold, values that must all embody:

- We are all responsible for compliance with laws (specifically Tax and Employment laws), regulations and standards.
- We are all guardians of the moral and ethical principles that underpin our various professions.
- We all contribute to enhancing the reputation and promoting the internal and external image of our Group. The Code of Ethics exists to remind us of this, to guide us and to help us make the right decisions. It is provided as a reference to clear up any uncertainties.

The Code of Ethics reasserts the DASA Group's collective commitment to instil and develop this confidence. Its goal is to allow each individual, in his or her daily activities, to embrace the fundamental values upheld by its managers and employees: promoting the protection of its employees, safeguarding its assets, promoting responsible citizenship, protecting its customers and promoting its products and services.

Respecting these values will thus help enhance DASA's positive reputation and it's performance.

How is this Code used?

The Code is a set of values and provisions which, though they cannot cover every possible circumstance, should help each person, according to his or her judgement and sense of responsibility, seek and take the correct decision in any given situation, in accordance with the laws and regulations applicable in the countries in which the DASA Group operates and the social, societal and environmental commitments undertaken by DASA.

1. PROTECTION OF EMPLOYEES

Respect for people is a fundamental value at DASA: each individual has a duty to contribute to the cohesion of the company by conducting professional relationships with both managers and colleagues that are open, loyal and respectful to all.

As such, the DASA Group undertakes:

- not to discriminate for any reason whatsoever in working relationships and in particular:
 - not to discriminate against persons on the grounds of gender or age, racial, social, cultural or national origin, union activity, sexual preference, disability, political opinion or religion;
 - to recruit and promote its staff members according to their specific qualities and treat them with dignity, without favouritism and with due respect to their private life;
- to take the necessary measures to ensure that working conditions protect the health and safety of employees;
- to take the necessary measures to ensure the safety and protection of individuals;
- to comply with laws and regulations governing the protection of employees' personal data.

2. PROTECTION OF ASSETS

PROTECTION OF TANGIBLE AND INTANGIBLE ASSETS (*)

The safeguarding of DASA's assets is key to its prosperity, which is of benefit to all employees.

DASA employees are duty-bound to help protect and preserve its assets against all forms of deterioration and damage, theft or misappropriation.

RESPECT FOR CONFIDENTIALITY

One of the means by which intangible assets are protected is by implementing and respecting confidentiality. The DASA Group's employees may hold information belonging to the DASA Group that must remain confidential insofar as its disclosure may be harmful to DASA's interests. This information may relate to products, studies, technical projects, industrial data, commercial and financial plans, HR data and all elements that may involve intellectual property rights and know-how.

Each individual must ensure that any restricted information is not circulated outside the company or even communicated to persons employed within the company who are not authorised to obtain it, such as apprentices. The same applies to temporary workers, trainees and employees of service companies called upon to implement a service contract.

PROTECTION AND ENHANCEMENT OF THE DASA GROUP'S IMAGE

The quality of the corporate image and the reputation of its products and services are necessary conditions for its long-term sustainability. All employees should be aware of their importance, must help maintain a positive reputation and abstain from any disparaging act and from initiating or supporting any boycott action, negative communication, institutional campaign or any action unfavourable to the DASA Group, of any kind, including when using public social media.

(*) 'Assets' in this instance refers not only to tangible property such as buildings, facilities, machines, vehicles, equipment, computers, IT systems and supplies, but intangible assets such as intellectual property, know-how and the sensitive data we handle.

3. PROTECTION OF CUSTOMERS

The confidence placed by DASA's customers in its business and products is one of the company's primary concerns.

The confidence of customers is acquired and maintained, in particular, through stringent respect for their rights, preservation of their interests and a constant concern to undertake only those commitments that can be upheld and respected.

To this end, the DASA Group and its employees undertake to:

- comply with all rules, processes and technical and environmental requirements that govern the safety and quality of DASA's products;
- only deliver to customers and consumers verified and honest information about the products and services delivered and their characteristics;
- comply with relevant laws and regulations governing the protection of customers' and/or prospective customers' personal data.

4. PROMOTION OF RESPONSIBLE CITIZENSHIP IN A GLOBAL ENVIRONMENT

POLITICAL AND RELIGIOUS ACTIVITIES

Employees who undertake political and/or religious activities shall do so in a strictly private capacity and abstaining from any attempts at proselytizing. Moreover, DASA Group does not finance any type of political parties or religious institutions.

RELATIONSHIPS WITH THIRD PARTIES

ECONOMIC PARTNERS

DASA wishes to foster loyal and equitable relationships with its economic partners.

SUPPLIERS

All services must be subject to competitive tendering and an order or contract, as well as a regular inspection of their appropriateness and compliance with changes in competition. Suppliers must only be selected according to their performance, assessed on the basis of objective criteria. This selection should also take into account ethical criteria applied internally by suppliers; in particular, the company shall ensure that its suppliers adhere to the fundamental rights of employees in accordance with the principles laid down by DASA, and that they undertake to ensure that they are adhered to by their own suppliers.

NON-COMMERCIAL PARTNERS

Public relations, sponsorship and all other forms of non- commercial relationships must not be subject to favouritism.

RECOURSE TO INTERMEDIARIES

Having recourse to agents, representatives, negotiators, advisers and consultants forms part of those acts which are necessary for the proper management of DASA, thanks to the skills and assistance which such parties provide.

Their remuneration must be transparent and proportional to the services stipulated in the contract and it must be incorporated naturally into the legal framework.

CONFLICTS OF INTEREST - INVESTMENTS IN EXTERNAL COMPANIES

DASA employees may be confronted with situations in which their personal interest, or the interests of natural persons or legal entities that they are associated with or in the management of which they are involved, may enter into conflict with the interests of the DASA Group. It shall be their responsibility in such cases to declare the conflict of interest to their line manager and an appropriate course of action will be agreed upon.

CORRUPTION AND DISGUISED REBATES

No employee of DASA may, directly or indirectly, accept or require any bribe or advantage of any kind (gift, invitation, etc.).

The DASA Group must not offer or give any bribes or other advantages, nor agree to any requests for the same.

DASA must not grant any rebate concerning part of the payment for performance of a contract to the employees of their contracting party, nor have recourse to any other practices (subcontracting, orders, etc.) in order to make payments to officials, employees, relatives or associates of their contracting parties.

PAID WORK

No paid work for an entity outside of DASA can be accepted if it is in conflict with the interests of the DASA Group. To avoid any difficulties, any full-time employee who wishes to conduct a professional activity outside the company should discuss this with his or her manager.

CORPORATE SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

CORPORATE SOCIAL RESPONSIBILITY

Corporate Social Responsibility is the framework based upon which the company implements the concepts of sustainable development. DASA's employees undertake to incorporate social, environmental and economic concerns into their actions, taking the interests of all stakeholders into account (employees, customers, shareholders, suppliers, etc.).

CORPORATE ENVIRONMENTAL RESPONSIBILITY

The commitment of all employees to take into consideration and seek to reduce the negative impact of their activities on the environment as a whole is key to ensuring the company's sustainable development.

The protection of the environment is thus a fundamental principle for the company; it is one that applies at all stages of its activities and is implemented by each employee.

APPLICATION PROCEDURES

Employees should address any questions regarding the application of the principles defined in this Code to their line managers; if they deem the information received to be incomplete and unsatisfactory, they should raise this with their line manager also.

In addition to the standard routes (line manager, human resources department, statutory auditors, etc.) and for the financial, accounting, banking, anti-corruption and anti-competition fields, if an employee has good grounds for doubt or suspicion concerning practices that may have a seriously adverse effect on the company's business or incur its liability in these fields, a whistleblowing system is also available.