



**LCDC**  
TELECOMS

## **CODE OF CONDUCT**

# **ANTICORRUPTION, COMPETITION LAW and BUSINESS ETHICS POLICIES**

**April 21<sup>st</sup>, 2015**

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**SUMMARY**

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**1 ANTICORRUPTION POLICY**

LCDC Telecoms SA is competing in all countries in which it studies, supplies, implements and operates their integrated telecoms systems. Our added value is based on the superior quality, productivity, the real added values on products and services, and by our team of fully trained and experienced employees. The Company does not obtain any business advantage through bribery, improper payments or any illegal means.

LCDC Telecoms SA, its employees, and persons or entities acting on its behalf are strictly prohibited from offering, paying, or authorizing anything of value to a public or company official to influence or reward any act of an official or to gain any improper business advantage. In addition, the direct or indirect offer, payment, solicitation, or acceptance of bribes in any form is strictly prohibited. Moreover, no contributions of LCDC Telecoms SA funds or assets shall be made to political parties or organizations, or their leaders, or to candidates for any public office.

This policy also applies to any activities on behalf of LCDC Telecoms SA conducted through a relationship or arrangement with any third party (person or companies) that are intended to assist LCDC Telecoms SA company in obtaining or retaining business. Selecting, utilizing and contracting with Agents must be done in strict compliance with our “Q-HSE and SI” Manual. Where a country’s law governing corrupt practices requires that a certain internal accounting controls be implemented and monitored to ensure compliance, then such controls must be followed by all employees.



## 2 BUSINESS ETHICS POLICY

LCDC Telecoms SA is committed to, and expects from its employees, the highest ethical standards of business conduct and compliance with laws and regulations in the countries where we study, supply, implement and operate our integrations of telecoms systems.

The Company obtains business through well-trained and a spirit dedicated to customer service through the rules and guidelines of our "Q-HSE & SI" Manual.

LCDC Telecoms SA does not solicit or maintain business through illegal conduct or practices of unfair completion such as price fixing, collusion with competitors, or deceptive trade practices. Employees should not accept (nor provide) gifts of more than token value from (or to) any company or individual that does business with LCDC Telecoms SA, or seeks to do so.

LCDC Telecoms SA expects all employees to raise concerns and to ask questions when issues arise. Employees are encouraged to contact their line or functional manager to resolve issues of concern. Other available options for employees include contacting an appropriate functional representative (in the personnel, Legal, Finance, or other department), or the LCDC Telecoms Management team. It is the responsibility of line and functional management to make sure that appropriate issues of concern are brought to the attention of upper management.

## 3 COMPETITION LAW POLICY

LCDC Telecoms SA employees must comply in all respects with all applicable competition and antitrust laws.

All managers are expected to maintain a basic familiarity with the principles and purposes of these laws as they may be applied to LCDC Telecoms SA businesses. Employees concerned with or responsible for the pricing or sale of LCDC Telecoms products and services should pay particular attention to these issues.

These laws prohibit, among other things, (1) anti-competitive agreements, (2) abuse of market power and monopolization and (3) anti-competitive mergers, joint venture, acquisitions and divestitures or other anti-competitive business combinations. Conduct that might fall into these general prohibitions includes price-fixing, market/customer allocation, and bid-rigging.

The consequences for not complying with these laws can be severe, including the issuance of significant fines and the voiding of agreements or provisions in agreements. In addition, criminal sanctions may be imposed on individuals and companies. This area of the law is constantly evolving, and there can be questions regarding the extent to which competition laws apply in certain situations. Anyone involved in an actual or potential transaction, or discussions with representatives of other companies, which may possibly be covered by express provisions or the spirit of this Policy, should seek clarification on the situation from our Directorate board.

Any violation of these Policies could result in the civil or criminal prosecution of LCDC Telecoms SA and the persons involved. Internally, any violation of this Policy may subject the employee to disciplinary action.

