

The background is a collage of various images related to business and construction. It includes hands pointing at documents, rolled-up blueprints, a yellow hard hat, a glass of orange juice, a bouquet of flowers, and a pencil holder with several colored pencils. The collage is overlaid with a white grid pattern. A large blue rectangle is positioned on the left side, containing the year '2023'.

20
23



ETEP CODE OF CONDUCT

ETEP'S MANAGEMENT
COMMITMENT FOR THE
PROMOTION AND
STRENGTHENING OF
INTEGRITY IN THE CONDUCT
OF BUSINESS

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FORWORD



Given its local and African presence and the rapid development of its activity, ETEP's governing bodies have decided to formally mark the company's unconditional commitment to conduct its business with integrity in accordance with ethical and conformity.

ETEP's management considers that probity and compliance are essential to ensure the sustainability of business relations and to maintain the trust of its institutional partners, its customers and its employees. Our company is committed to its collaborators and Business Partners, to support and disseminate the principles of compliance in business conduct by working to apply the principle of zero tolerance to non-compliant behaviour.

This Code of Conduct defines the principles and clear rules of compliance that will apply to the company as well as its collaborators, Business Partners and any third party. The Code defines and illustrates in particular the various behaviors to be prohibited and the mechanisms for preventing and sanctioning cases of misconduct. Rules and principles of this Code will apply subject to local state laws and regulations and international conventions, as well as the thematic internal regulations adopted by the company.

OVERVIEW OF THE COMPLIANCE FUNCTION

The compliance Officer is in charge of implementing the Compliance Program. He/She monitors compliance with the rules established by the company and provides risk monitoring. In particular, he/she is in charge of compliance with the Code of Conduct as well as internal policies and regulations adopted by ETEP. The compliance Officer reports directly to the Board of Directors and submits regular reports on his activity. He benefits from the independence and autonomy necessary to carry out his mission in accordance with the Compliance Charter.

The Compliance Officer will carry out the mission of control and periodic risk assessment. To this end, a risk map is periodically updated. The update of the risk map as well as any corrective measures are submitted to the Board of Directors by the Compliance Officer at least once a year. The compliance Officer is authorized to include on the agenda of directors' meetings any matter that he/she considers relevant and related to compliance.



OVERVIEW OF THE COMPLIANCE FUNCTION

The Compliance Officer will monitor the implementation by the Business Partners of the internal compliance rules, in particular the standards related to the prevention and repression of corruption, fraud, and any inappropriate act in the conduct of business. Monitoring of this implementation is carried out every 12 months at least.

In coordination with the Compliance Officer, management periodically examines the Compliance Program as well as the standards and principles set out in this Code while taking into consideration the elements related to the evolution of the activity and the sector in general and to the appearance of new potential risks.



The compliance function will be audited by an external auditor duly mandated by the Board of Directors. The audit will be carried out at least every 24 months.



SCOPE & BINDING FORCE

The Code of Conduct applies to all collaborators and Business Partners of ETEP. It also applies to all subsidiaries, to any entity controlled, managed or in which the company holds a stake, even a minority one, as well as to agreements consisting a partnership (consortium, joint ventures, etc..) The Code of Conduct is applicable wherever ETEP operates, in Tunisia and abroad. Each collaborator and Business Partner is obligated to comply with the Code and not to commit any act or omission or take part in any agreement or action in violation of this Code or the law. Any inappropriate behavior breaching the provisions of the latter will be taken very seriously by the management and will be liable to disciplinary sanctions, which may go as far as dismissal in accordance with the Disciplinary Regime, as well as all penal and civil sanctions.



Compliance with ethical standards in the conduct of business as well as strict compliance with the law have enabled ETEP to maintain its reputation, in Tunisia and abroad. We require our employees and Business Partners to comply with Tunisian regulations and laws relating to the prevention and fight against corruption and money laundering as well as all laws and regulations in force in the countries where we operate. In addition to Tunisian laws and regulations on the fight against corruption and money laundering, ETEP will comply with the rules and standards set out in the African Union Convention on the Prevention and Fight against Corruption, the principles OECD guidelines as well as the principles of the International Chamber of Commerce in the anti-corruption fight. It is the personal responsibility of each employee to be aware and to respect the laws and regulations in force in the countries where he exercises his mission or his employment.



COMPANY VALUES

1.1 Anti-corruption fight

It is strictly forbidden for a person in the context of a professional or social activity, a management function or work for a natural or legal person or for any organization, to solicit or approve without right, at any time, directly or indirectly, offers, promises, gifts of presents or any advantages for himself or for others, to accomplish or to have accomplished to abstain or to have abstained from performing an act of his activity or his function or facilitated by his activity or his function, in violation of his legal contractual or professional obligations. The simple exchange even fortuitous, relating to an act or omission which could be qualified as corruption is considered as an infraction of this Code and may lead to disciplinary measures which may go as far as dismissal in accordance with the Disciplinary regime.

1.2 Facility payment

Facilitation payments are small sums paid in cash or in the form of small gifts to a public official with a view to obtaining a service to which the applicant is legally entitled or with a view to speeding up a procedure. These payments are intended to facilitate the execution of an act and to encourage the accomplishment by public officials of their mission. ETEP considers facilitation payments as bribes and strictly prohibits them. Any facilitation payment made by an employee will be sanctioned in accordance with the Disciplinary regime.

1.3 Influence Peddling

Fact of soliciting or accepting by anyone, at any time, directly or indirectly, offers promises, gifts of presents or any advantage for himself or for others, to abuse or have abused his influence real or supposed, in order to obtain from an authority or a public administration, distinctions, jobs markets or any other favorable decision





COMPANY VALUES

In brief and in examples :

Corruption is the fact of offering or accepting directly or indirectly including through an intermediary in a relationship with a person from the public sector or from some the private sector any .advantage that may influence a decision

Example of benefits : A cash payment, a loan, a price reduction, a gift and invitation to a cultural or sporting event, drinks, meals a promise to hire a family members Etc

Case

I am working on a call from tenders concerning the operation of a public authorities infrastructure. I am contacted to be told That a bid would be better valued in return of a payment of a sum of money. **What should I do?** The solicitation seems inappropriate it could be analyzed as **a bribe**. It is essential to inform my interlocutor that I will not make this payment and to notify the ..hierarchy

A third party tells me that he has privileged contacts at the ministry of Infrastructure. He offers me his help to facilitate a Ministry decision favorable to ETEP for an important bid. **What should I do?** This proposal, although it may start from a good intention, could be analyzed as **influence peddling**. It is therefore necessary to submit the case to the Compliance Officer

As a part of the execution of a legal expertise, the statutory Auditor appointed by the mission proposes me as a representative of ETEP to intrust it with an internal audit mission in the near future in exchange for the establishment of a favorable expert report. **What should I do?** This proposal seems to be **a bribe** and it is important to refuse and it is necessary to inform the party who commissioned this expertise, the line manager and the .compliance Officer

BREAKING THE CHAIN OF CURRUPTION





COMPANY VALUES

2.Prohibition of collusive maneuvers

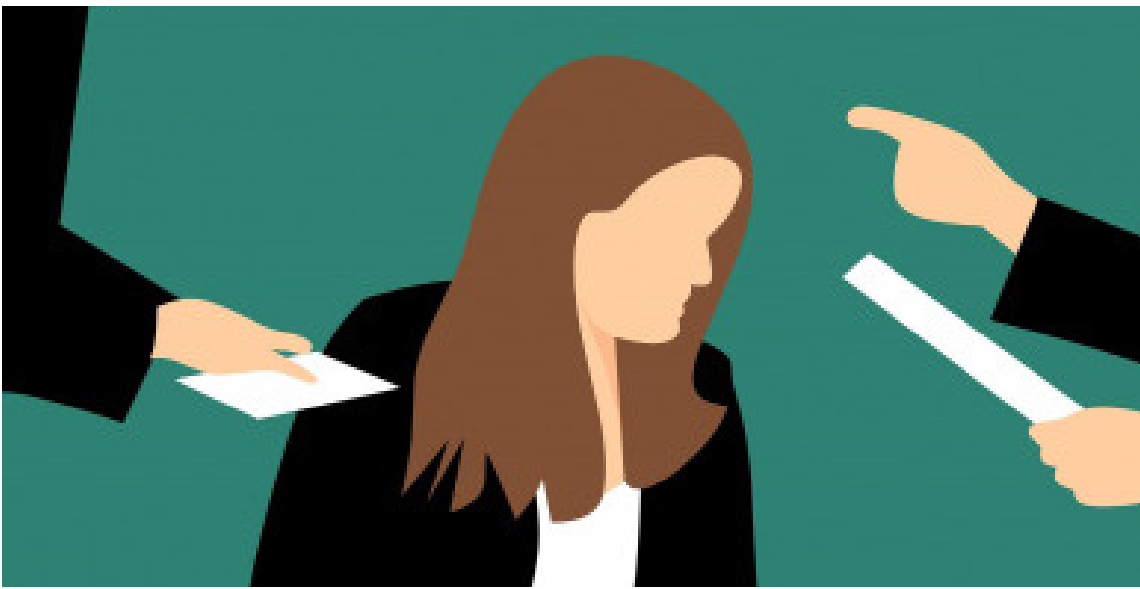
It is an anti-competitive practice in the form of an agreement between two or more parties for an unlawful purpose including to improperly influence the actions of another party. ETEP strictly prohibits this type of maneuver.

2.1 Prohibition of coercive maneuvers

It involves impairing or causing harm directly or indirectly to a party or its property in order to exercise its Right of inspection and audit. It is the will of forcing compelling someone to do something or oblige him to accomplish it. It is strictly forbidden to bind a person by his position or his influence by force or pressure to do or not to do something against his will.

2.3 Prohibition of obstructive maneuvers

And obstructive practice is deliberately destroying, falsifying, entering or concealing evidence from the investigation or making false statements in order to materially hinder an investigation into allegations of corruption, fraud, coercion or collusion and/or threaten harass or intimidate a party to prevent it from disclosing its knowledge of matters relevant to an examination or from continuing the investigation or acts intended to materially interfere with the exercise of ETEP's inspection and audit rights. Any hindrance to the proper performance of internal audit assignments as well as any alteration concealment or refusal to transmit information in this context would constitute serious breaches of this code of conduct.



Case

In the context of a call for tender, another bidder proposes to me to determine between us who "wins" by consulting our bids or offers in such a way as to ensure that the designated bidder is selected by the competitive process. **What should I do?** This proposal is immoral and unethical. We must all act with loyalty and reject any form of **collusion** whatever its nature. Any illicit agreement is expressly prohibited and exposes its author to heavy sanctions in accordance with our disciplinary system.

A friend of mine now works in another competing company, I am participating in a call for tenders for which his company has submitted a bid. We want to have lunch together during the procedure. **Can we do it?** In view of the risks of suspicion that this lunch could generate, it is preferable to postpone it to a later date when the call for tenders is closed.

I am thinking of coercing a competitor by using physical violence to force him to abstain from participating in a call for tender. **Can I do it?** No this is an illegal practice the company does not tolerate any form of **coercion** nor violence of any form.

A colleague tells me that he intentionally destroyed fictitious recorded invoices in order to erase any trace of fraud. **Can he do it?** ETEP does not tolerate any form of **obstruction**. Indeed, the use of such practices by employees is strictly prohibited and will engage the individual responsibility for the latter who will be sanctioned in accordance with the disciplinary regime and the civil and criminal laws applicable in the matter.

Coercion

Forcing someone, by some method or other, to do something or abstain from doing something against their will.



COMPANY VALUES

3. Anti-money laundering fight

Money laundering is the act of concealing the source of illicit funds by giving a legal basis to this illegitimate source from which these funds come so that they appear to have been acquired legally and are not subject to the laws criminalizing income derived from tortious or criminal activities. In the criminological sense of the term, laundering refers to the process aimed at reinjecting funds of illicit origin into the legal economy. ETEP, systemically verifies the origin of the funds that the company receives. all Financial transactions are conducted in accordance with applicable Nationalm Regional and international anti-money laundering laws and regulations. In the event that a transaction appears suspicious or has certain elements that are inappropriate or contrary to anti-money laundering rules, it will be imperative to inform the finance department and the compliance officer. Any offense committed by an employee, directly or indirectly, related to money laundering, will be severely sanctioned in accordance with the disciplinary regime and will be liable to criminal and civil proceedings.

3.1 Anti-fraud fight

This is any act or Omission committed by an employee vis-a-vis the company or to a third party (example : client, Public Authority, Etc..) The fraudulent act aims in general, to mislead or to deceive a natural or legal person in order to obtain any illicit advantage. It may constitute fraud to falsify corporate documents, misappropriate company assets or resources, deliberately establish or disseminate false financial information, manage or execute an unauthorized cash transactions or payments or record accounting entries that do not comply with the accounting rules in force. Any fraud may give rise to sanctions under the disciplinary regime which may go as far as dismissal, in addition to the applicable civil and criminal penalties. Similarly, the fact of deliberately providing or disseminating false information to a client to lead him to conclude a contract my constitute a fraudulent Act.ETEP does not tolerate any form of fraud or deliberate misinterpretation. Any fraudulent act must be reported to the compliance officer.



CASES :

Following a business trip abroad, I forgot to record all the expenses incurred. I am thinking of inflating the expense report for the next trip to include the expenses not indicated in the previous report. This seems acceptable to me, since the total will be the same in the end. **Can I do it ?** No, expense reports must be issued faithfully and precisely, a fake expense report is **fraud** and will produce inaccurate accounting record which may expose you or the company to sanctions.

I want to reinject the money that I hit from the tax authorities into the economic Circuit of my company. **can I do it ?** No, this is **money laundering**.

I learned that the accountant intends to create a front company and pass it off as a partner using funds obtained from corruption. **What should I do?** ETEP's policy is very clear on this subject, it is strictly forbidden to **launder money**, it is imperative to inform the compliance officer and the financial director.

A call for tender relating to the carrying out of a technical study requires the assistance of an expert with proven experience of 10 years. I happen to have only 9 years of experience. **Can I mention 10 years of experience instead of nine?** No, even if the modification may seem minimal, it will be a **fraudulent act** which will jeopardize the reputation of the company and will lead to disciplinary sanctions and sanctions from contacting authorities.

1. PLACEMENT

Dirty Money Integrates into the financial System

**2. LAYERING**

Wire Transfer



Transfer funds between various Offshore / Onshore Banks

3. INTEGRATION

Purchase of Luxury Assets
Financial Investments
Commercial / Industrial Investments





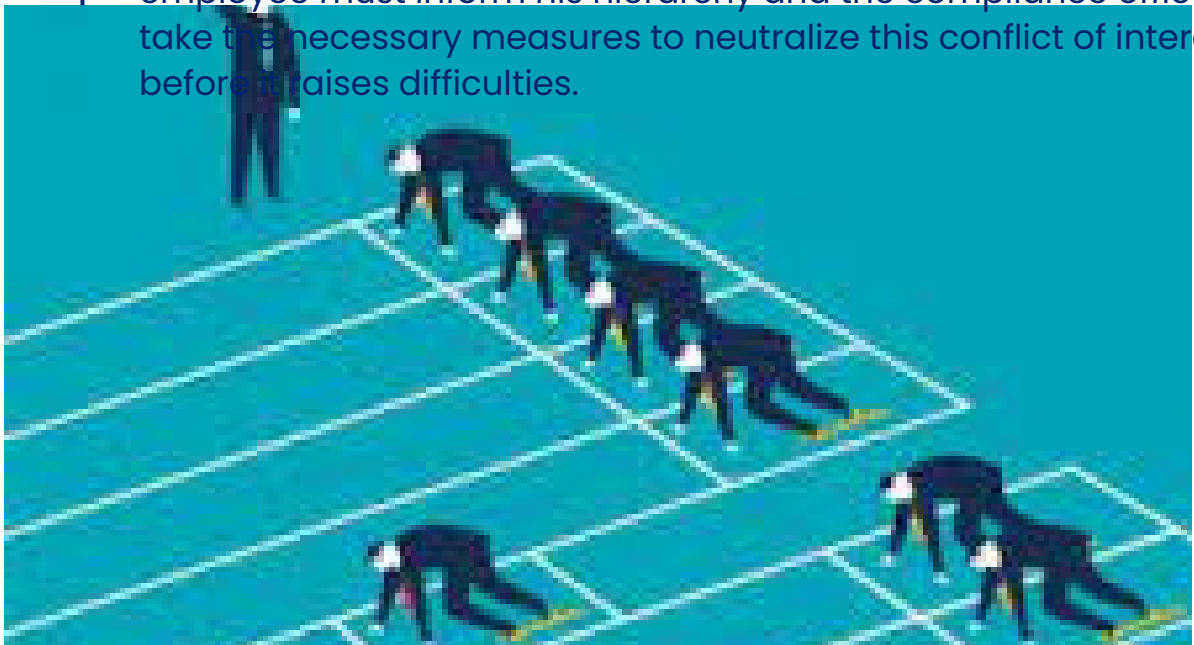
COMPANY VALUES

4. Anti-unfair competition fight

Our company strongly believes in free and fair competition. Any breach of free competition is prohibited within ETEP. It expects its employees to scrupulously respect the competition laws regardless of the country concerned. In the case of a person (Example : a competitor or supplier), inviting an employee to enter into agreements contrary to the competition rules, the latter, will be obliged to explicitly refuse this offer and to immediately inform the compliance officer. Thus, it formally prohibits employees from taking part in an agreement aimed at hindering free competition. Any agreement whose purpose is to artificially obtain a price increase or decrease, to control or limit access to a product or a technological advance, to distort a tendering process, to share market shares or customers as well. In particular, employees must refrain from exchanging commercially sensitive information with competitors even informally. Employees who violate these rules would be liable to civil or criminal penalties in addition to the disciplinary sanctions provided for by the Disciplinary regime.

4.1. Prevention of conflicts of interests

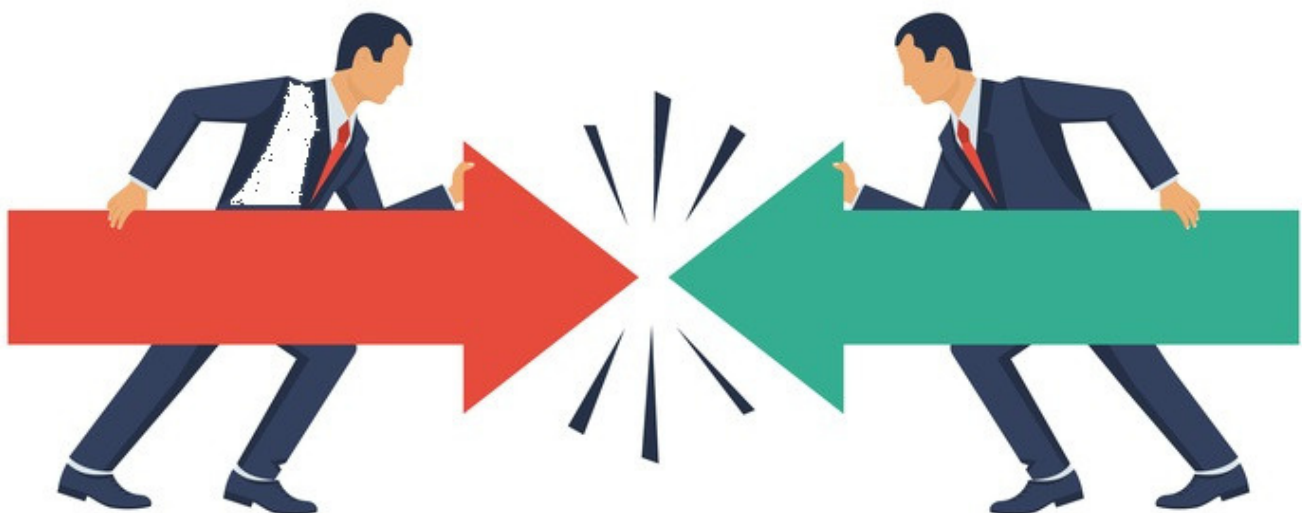
Integrity and loyalty must prevail in the professional relationships to all employees inside and outside the company. Indeed, the conflict of interest designates any situation or significant interest (Financial, family, affective, political Etc) foreign to the company, is likely to influence and weaken the independent impartial and objective exercise of the functions of an employee. Each employee has a duty of loyalty to the company. In this regard, we must all prevent any conflict of interest that could arise when our personal interests prove to conflict with the interests of the company. All employees must ensure that they do not engage in activities or enter relationships that could place them in a conflict of interest situation or give the appearance of such a conflict in relation to their duties or the interests of the company. In any case, in the event of the occurrence of a conflict of interest or in the event that the employee anticipates such a conflict of interest, each employee must inform his hierarchy and the compliance officer and take the necessary measures to neutralize this conflict of interest before it raises difficulties.



CASES

ETEP's employee Participates in an official visit abroad. During the flight, I discuss with an employee of a competing company we enfor;s me of the decision of his employer to participate in a call of tenders from the ministry of Infrastructure of the host country. My interlocutor understands that my company will also present an offer and he confides to me that he is particularly keen to win this call of tender for career reasons. He asks me to ensure that ETEP's offer is not competitive. In return, he offers me the transmission of information on a different offer that will be presented by his company as part of the current call of tender. **Can I do it ?** No, conversations with competitors about current call of tenders, pricing or terms of the offer are prohibited. It will be necessary to end the conversation immediately by specifying that the offer made by the competitor is probably liable to legal proceedings in the house country and to inform the compliance officer as well as the head of ETEP's delegation person during the official visit because it is a proposal of **unfair competition**.

A person with whom I have a close relationship works for an ETEP supplier who recently submitted a proposal ETEP and my manager wants me to join the team in charge of reviewing all offers including the one submitted by the person with whom I have a close relationship. **Can I accept ?** No, I have to decline my manager's proposal and explain to him that I know the person closely. This is a **conflict of interests**, My opinion may be biased and my decision could favor my own interests or those of people with whom I have a close relationship instead of the interests of my company.



Conflict of interest



COMPANY VALUES

4.1.2. Limitation of the recourse to intermediaries

ETEP opposes any payment or illegal payment directly or through an intermediary, to civil servants, member of governments, public official or private entities. Such payments must also be considered prohibited, when they are made by an intermediary or an external consultant on behalf of ETEP and at its requests. In the event of the use of agents, intermediaries or external consultants, It should be ensured that they provide competent assistance based on specific professional expertise, that the amount of the remuneration is justified by the task assigned and that the importance of the services performed can be apprehended by examining the documents they submit. This remunerations must be identifiable, correspond to Market standards, be correctly accounted for and have as consideration services actually rendered in accordance with ETEP practice in terms of authorized expenses and accounting rules. Persons covered by this code must obtain information from the compliance officer about eligible remuneration in order to comply with applicable law.

4.1.3. Public procurement

It is prohibited in particular to pay a commission, a rebate, a discount, consulting fees or remuneration for services rendered in the form of money or financial benefits, when such payments are intended to remunerate a member of the government, a civil servant or public official, in order to obtain a favorable decision or to obtain any or induce advantage for ETEP. ETEP pays particular attention to the development of contracts concluded within the framework of public consultations or contracts signed with States or public entities in Tunisia and abroad. ETEP requires its employees to strictly comply with the specific rules governing public contracts, regardless of the country where the activity is carried out, as well as compliance with all the regulations and anti-corruption measures in force.



CASES

One of your clients contacts you to inform you that the ministry of Defense intends to begin renovation and extension work on the main military installation in the country. The client in question is the brother-in-law of a high-ranking army officer and civil servant at the ministry of defense and confirms that the latter, could arrange to obtain the contract for your company by mutual agreement instead of tendering procedure provided by the law on public procurement. In return, you are asked to have ETEP finance the studies of the daughter of the high ranking officer in question in a university. **What should you do ?** This is a clear case of a **patronage proposition** to obtain a government contract. It will be imperative for you to clearly refuse this proposal and distance yourself from this client. Your line manager as well as the compliance officer should be informed of the episode.

During a project abroad, I would like to hire a local consultant in order to facilitate the establishment on site and the in-depth study of the place, the project and the workforce. The consultant having a great experience in the matter asks for remuneration which he presents in the form of a detailed estimate of the tasks to be accomplished and their prices. **Should I accept?** The recourse to the **intermediary** seems legal and his remuneration, if it is detailed and justified by the tasks which are assigned to him seems in a decency with the regulations. If his professional expertise and experience are also Justified then it is possible to use this consultant.

Any employee facing with a question in connection with the provisions of this paragraph, may before any decision is made, contact their line manager or ETEP's compliance Officer. This referent will be able to guide the employees action in order to make it comply with these provisions.



COMPANY VALUES

COMPANY VALUES



5. Relations with business partners

Acceptance of the rules of this code is mandatory for any business partner. A compliance and ethics compliance clause is included in the contracts concluded by ETEP with its business partners. ETEP expects each employee to carry out all possible and necessary due diligence with the view to verifying the reputation and history of business partners, Particularly in the case of establishing a new business relationship. The evaluation of the business partners, will be done in particular with the submission of a KYS questionnaire. ETEP selects its business partners on the basis of Economic and objective criteria. To this end, All offers from business partners are evaluated fairly and impartially in accordance with Market rules. Any personal preference not motivated by professional considerations or the disqualification of suppliers, is prohibited. A documented justification of the circumstances and selection criteria of the business partners as well as the contractual conditions negotiated must be provided by any employee to the management board as well as to the compliance officer. The renewal of the agreements concluded by ETEP, must obtain the agreement of the compliance officer. Evaluation of relationships with business partners is periodically carried out by ETEP management with the participation of the compliance officer in the monitoring/evaluation process. ETEP attaches particular importance to the dissemination as far as possible of the principles of integrity and ethics and conduct of business with business partners. Our company Works to ensure that the same principles are formally integrated by these latters into their respective internal policies as well as into their contractual agreements.



ETEP may participate in certain events if they prove to be related to the subjects which are among its priorities.

ETEP imposes a strict political religious and philosophical neutrality, the company thus refrains from making any Financial contribution for the benefit of candidates, elected officials or political parties. ETEP collaborators cannot use company funds to financially support directly or indirectly a candidate and elected official or a political party. ETEP respects the individual commitment of its employees to participate privately and as Citizens in political activities and undertakes not to interfere with them. However, These activities are carried out on a strictly personal basis and expense of the persons carrying them out. No political activity may be carried out in the name of the company. The compliance officer will ensure that employees who have their positions in countries on the eve of any elections are prohibited from funding political activities. In the event of a donation, The company monitors the quality and reputation of the charity. This contributions must imperatively be made in full transparency, cash payments are not permitted. A donation is illegal under anti-corruption rules if it is intended to influence official actions or secure an improper advantage.



COMPANY VALUES

CASE :

On the occasion of the anniversary of a political party an exhibition is planted in order to trace the main dates. I am contacted to find out if EŁEP wishes to sponsor the event. ***What should I do ?*** It is forbidden to associate the image of EŁEP with an event with a **political connotation** it is therefore necessary to refuse such a proposal.



CANDIDATE SUPPORT



COMPANY VALUES

7. Gifts, Hospitality and Travel Policy

Gifts and invitations sometimes offered to/by ETEP employees or members of their family might affect the independence of Judgment of persons in their relations with their business partners. Also, The principle within ETEP, is that any gift or invitation made or offered to/by an employee, whatever it's value, must be politely refused by the latter or not be made. The same applies to any gift or invitation offered to one of the members of the employee's family. Exceptionally, the employee may, however, receive or give business gifts of reasonable value from/for one of his business partners. If a gift that does not fall within the scope of this exception is received without the employee having been able to refuse it or despite his refusal, the employee must send it to his superiors who will decide on the appropriate treatment : return or sharing. Cash gifts will be systematically refused and returned and management will be informed. Invitations received to events organized by Third parties in a transparent manner, within the framework of sponsorship cultural or institutional communication activities with their stakeholders may be accepted only after having informed the hierarchy.

Outside the periods of calls for tender or contract negotiation, a meal may be offered to a third party If all the conditions below are met : The meal is organized within the framework of the professional activity. It takes place during a working day and aims to enable participants to discuss professional matters.

The value of the meal is that of an ordinary professional meal falling within the scales defined internally. Prestigious wines and high Gastronomy must be excluded.

Relatives of the guests are not present at the meal. These Provisions are also applicable in the situation where an employee is invited to a third party.

Under no circumstances May the travel or accommodation costs of member of the Public sphere be borne by ETEP or offered by any other means. The payment by ETEP of costs of the same nature for one or more members of a private organization can only be carried out after having obtained the written agreement of the compliance officer. The business trips of persons subject to this code are fully covered by ETEP within the framework of the internal procedures applicable in the matter. ETEP employees must comply with the internal policy on gifts entertainment and hospitality and record the gifts received or offered in the register provided for this purpose.



CASES :

I understand that ETEP cannot offer a gift to a civil servant.

Can I, however, offer him a gift with my personal money to thank him following the obtaining of an administrative authorization ? It is **prohibited** by ETEP to **give a gift to a government official or public official whether with company funds or personal funds.**

A supplier wants to thank me for extending a contract. He invites me to attend with my spouse and my children a sport final. **Can I accept?** Such invitations are **prohibited.**

To facilitate the relationship with the client who is going to sign a contract, I want to invite him to dinner, **can I do it ?** Invitations are not prohibited. They must be done in complete transparency and must not be the subject of a consideration or have the objective of making a profit. In the specific case, this invitation on the occasion of the conclusion of a contract, could be considered **as having the purpose or effect of influencing a future commercial decision**, It is therefore advisable to refrain from inviting this client as long as the signature has not taken place.

If the employee believes that his refusal or return of a gift is likely to offend the person who offered it or is contrary to local habits and Customs he must inform his line manager and the compliance officer to obtain instructions on the position to adopt in the situation in question.





COMPANY VALUES

8. Labor Relations

ETEP does not tolerate any discrimination in employment. All decisions on hiring, evaluation, remuneration, gratification and career evolution and its development are made solely on the basis of objective factors such as merit, qualifications, performance and any other professional consideration. Any employment of a professional resource under any title whatsoever (fixed, permanent contract, employee or consultant, Etc) is subject to prior control by the manager in charge of human resources and the compliance officer. The verification of information provided during the recruitment process (Example elements of the CV, references Etc), the background and other elements related to the reputation will be taken into consideration during the prior check. The recruitment of formal civil servants and/or public servants as employees or Consultants is subject to the approval of the compliance officer and the minimum period of 18 months will be required between the date of the last employment of the civil servant/public servant and the date of recruitment by ETEP. Any person recruited by ETEP, in any form whatsoever must agree to respect this code and the disciplinary regime which will be appended to the employment contract. A close relating to the respect of the compliance rules is provided for in the agreements contracts concluded between ETEP and its employees/Consultants. The respect of the standards of conduct of this code and the standards imposed by the compliance program will be taken into account during the evaluation of ETEP employees as well as during the implementation of the internal promotion process.

The compliance officer will periodically assess the staff in particular the most exposed staff with regard to the respect of the compliance rules.



9. Financial transactions and internal control

The operations and transactions carried out by the company are sincerely and Faithfully recorded in the accounts in accordance with the regulations in force and the internal ETEP procedures. The posting of inaccurate, incomplete and misleading information is strictly prohibited. Any transfer of funds, must be subject to particular attention, particularly as to the origin of the funds, the identity of the recipient/beneficiary and the reason for the transfer. If an employee, in particular, a financier considers that a financial practice or transaction raises questions about the respect of the regulations in force, or if he has questions about the proper application of a law or regulation, he must refer to their line manager and the compliance officer.

The financial Control Function is carried out by the internal audit Department which ensures during regular missions or specific missions that any accounting Financial or transactional operation performed by ETEP is carried out in accordance with the regulations in force as well as with the principles of the code and internal procedures adopted by ETEP. Each employee works with the Members of the audit department, which care and diligence to improve the internal control and risk management system so that any significant deficiency or weakness can be identified and corrected.

10. Confidentiality and personal data protection

ETEP respects the laws on the processing of professional and personal data and takes all necessary measures to ensure that both written and electronic personal data (commercial and Technical personal data on customers, suppliers, collaborators) are managed in a legitimate and appropriate manner in respect of the laws and regulations applicable in Tunisia and in the countries where the data is collected. It will be the responsibility of each employee to take the necessary measures to guarantee the protection of the data in their position and not to use or disclosure them inappropriately.



ETEP TRAINING



ETEP is committed to provide periodic and quality training on the topics of ethics and compliance in the conduct of business.

The training sessions are suitable for all new collaborators, as well as for business partners wishing to take part.

The training plan is designed by the compliance officer in collaboration with the various ETEP departments.

Conventional classroom-based training sessions are periodically organized and are intended in particular for the staff most exposed to the risk of compliance.

Collaborators and business partners can also ask the compliance officer to benefit from dedicated training.

A compilation of training support documents will be provided by the Compliance Officer and will remain available to collaborators and business partners.



ETEP ALERT DEVICE



The ETEP Internal Alert System is available online.

Our company wishes to be informed immediately of any violation of this Code, or of any actual or potential violation of the internal rules adopted within the framework of the Compliance Program or of the applicable regulations/laws.

The alert e-mail address **compliance@etep.com.tn** and the compliance toll-free

number **8010660** are accessible to all collaborators/third parties wishing to report an actual or potential violation.

Reporting via email or phone call is not mandatory. The direct transmission of the report to the line manager and/or the compliance officer remains possible.

In accordance with the ETEP internal Alert system and to the Tunisian Law :

I- Whistleblowers will not be sanctioned or questioned, either directly or indirectly, for having issued an alert in good faith,

II- No form of pressure or threat to prevent anyone from exercising their right to report will be tolerated.



SANCTIONS

In the event of non-respect by an employee of the rules established by this Code or the procedures related to it, his personal liability may be engaged and he will be subject to internal disciplinary sanctions which will be proportional to the seriousness of the violation observed and which may go as far as the termination of the contract in accordance with the disciplinary regime.

It is therefore everyone's responsibility to properly read, understand and respect this Code as well as the disciplinary regime.





CODE OF CONDUCT 2023

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