



# FUNDAMENTAL PRINCIPLES



# Fundamental Principles for a common framework and shared culture

“Dear Employees,

At MasterGrid, we are all united by the same commitment to Excellence across our different activities. This shared responsibility, combined with the quality of our products and services, forms the basis of our reputation and success with our customers and partners.

Yet all it takes is one moment, one wrong choice, to compromise everything we have built together. That's why this reference document has been drawn up. Its aim is to bring our values into our daily practices, to inform our decisions, to prevent any deviant behavior and to reinforce our employees' and our partners' confidence in our company.

Simple and pragmatic, this guide highlights the essential principles:

- A safe and motivating working environment
- Acting with integrity
- Protecting our resources
- Integrating environmental issues – essential for ensuring the sustainable performance of our activities.

We invite you to read these Fundamental Principles carefully, put them into practice and encourage others to respect them.

Together, let's preserve our integrity, consolidate our common culture and live up to MasterGrid's values in everything we do.”



**Ludovic Vallon**  
*President*

**Loïc Zangara**  
*VP Operations*

**Benoît de Turckheim**  
*VP Sales & Development*

## To whom do these Fundamental Principles apply?

The Fundamental Principles apply to all MasterGrid employees, regardless of their position, responsibilities, seniority or site, as well as to all company's subsidiaries and entities.

MasterGrid also encourages its partners, including customers, suppliers and subcontractors, to adopt strict ethical standards. We have drawn up these Fundamental Principles so that they are easily accessible to our employees and to all our stakeholders, whom we encourage to adopt similar rules.

## The role of the Fundamental Principles in our business activities

The Fundamental Principles support and protect our activities and our organization. They are there to provide everyday guidance. They set out MasterGrid's expectations and standards for ethical behavior and responsible business practices.

Each of these Fundamental Principles contains concrete examples and behavior recommendations (“do’s” and “don’ts”) so that all your questions can be answered. Useful contacts and a list of reference documents are also included for each topic.

If in doubt, we encourage you to seek advice and report any cases that may breach the law or our internal standards and policies. If you're a manager or team leader, it's your responsibility to create an environment that inspires confidence in your staff and encourages them to share their concerns, to listen to what they have to say, and to take appropriate action.



## The Fundamental Principles at the heart of our business plan!

In addition to establishing the rules by which our company operates, the Fundamental Principles aim to ensure consistency with our business plan: our vision, our mission and our values, which are at the heart of our activities.

These elements help us define not only what we do and why, but also how we do it. Our collective duty now is to apply these principles and values to all our day-to-day activities, so that we can generate and maintain the long-term trust of all our stakeholders.



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# Health and Safety

Ensuring a safe and healthy working environment for all our employees is a priority for MasterGrid. We implement Health and Safety risk prevention policies, which include the **systematic assessment of hazards, special attention given to working conditions and the adoption of appropriate protective measures.**

We give appropriate instructions to employees, **informing them and making them aware of the risks inherent in their activities** via regular, proactive and targeted communications. We encourage **shared vigilance** at all levels.

We also pay special attention to the **safety of employees on business trips. We rigorously monitor up-to-date information on the countries in which we operate**, so that we can deploy measures adapted to local contexts.

The development of our products and solutions is always carried out **in compliance with the strictest standards, to ensure their optimal design in terms of the safety and health of our customers.**



## DO'S

- Demonstrate a **questioning attitude and shared vigilance** in all circumstances.
- **Report** any incident or risky situation related to Health or Safety immediately.
- **Exercise your right of withdrawal** in the event of a situation deemed to present serious and imminent danger.
- **Use protective equipment** suitable for fulfilling tasks and systematically check its **conformity/validity** before use.



## DON'TS

- **Prioritize the achievement of operational results** (meeting of deadlines, methods implemented) to the detriment of Health and/or Safety.
- **Take a personal initiative without a concerted assessment of the associated risks.**
- **Organize a business trip without prior notice** and/or without taking recommendations relating to the destination into account.

Want to find out more?



- Human Resources Department
- QHSE Department

## GOOD TO KNOW



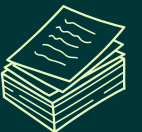
An **occupational risk assessment** is carried out at regular intervals, with the aim of **identifying, analyzing and preventing hazards.** The results are communicated and allow **the appropriate corrective measures to be deployed.**

**Field visits** on the topic of Health and Safety are carried out, mobilizing the experience and skills of all employees. These visits help **to identify best practices and areas for improvement, encourage sharing and ensure compliance with the most demanding safety standards.**

**Ongoing monitoring is in place** to ensure that staff have the **regulatory skills and training required to carry out their activities.** The material resources made available have always been certified as compliant with current safety standards.

## USEFUL DOCS

- QHSE policy
- Single occupational risk assessment doc
- Travel policy
- ISO 45001 certification: 2018, MASE



# Quality of life and Ethics

MasterGrid is committed to promoting an **optimal quality of life at work** by creating a **stimulating and caring environment** while fostering **team spirit**. We listen to employees and encourage a **culture of well-being**, where everyone feels **respected and valued**.

We expect all managers and employees to act with **integrity, respect and responsibility**. MasterGrid applies a **strict and uncompromising policy against harassment, abuse and any form of discrimination**.

Recognizing the importance of a good **work-life balance**, MasterGrid implements flexible working arrangements, while guaranteeing the right to disconnect, to enable employees to reconcile their working hours with their personal constraints and **preserve their well-being**.

We are resolutely committed to **promoting inclusion and diversity** within our company and with our partners. We are convinced that diversity of experience, perspectives and skills enriches our organization.



## DO'S

- **Adopt an attitude of integrity**, respect and responsibility in all circumstances.
- **Report any situation** of inappropriate behavior experienced, observed or suspected.
- **Respond to internal surveys and polls**.
- **Propose initiatives** aimed at improving the working environment and company life.



## DON'TS

- **Show contempt** or adopt behavior that offends the dignity of one or more persons.
- Apply **discrimination criteria when hiring**.
- **Exclude a person** from a social event because of their origin, culture or beliefs.
- **Contract with companies that do not meet the criteria of the Code of Conduct**.

## Want to find out more?



- **Human Resources Department**
- **CSR Department**

## GOOD TO KNOW



Training on **professional ethics** is provided on a regular basis to all managers, to ensure **the appropriation and dissemination of corporate values on a daily basis**.

Employees' **opinions and suggestions** are actively solicited and taken into account. Concrete initiatives in favor of **Quality of Life and Well-being in the Workplace** are implemented.

Responsible **partnerships** are established, based on **common ethical values**.

**Resources offering support** and clear **reporting procedures** are available to all employees. Information is treated **seriously and in full confidentiality**.

## USEFUL DOCS

- CSR Charter
- Code of Conduct applicable to partners
- Rules of procedure
- Collective bargaining agreements / Company agreements / Internal notes



# Promotion and Recognition

Promoting and recognizing teams is essential for **cultivating a dynamic and motivating work environment**.

**Promotion and Recognition** rely on our **values** of expertise, responsibility, team spirit, agility and boldness. This principle aims to **value everyone's contributions and encourage collective commitment**.

Aware that **the success of the company relies on the performance of our employees**, at MasterGrid we are eager to involve our teams in this success.

Ensuring promotion and recognition within the company, with transparent and objective assessment criteria, is an ongoing process that requires **commitment at all levels of the organization**.

Each employee is invited to become an active **participant** in their own career path.



## DO'S

- Establish **constructive and regular exchanges** between colleagues and managers, in particular via **individual annual appraisals**.
- Develop **career paths and encourage internal mobility** with respect for equal opportunities.
- Provide opportunities for **training and skills development**.
- Encourage **knowledge sharing** between entities and departments, and foster **transmission**.
- Give the **most successful employees who respect the company's values** the benefit of an annual pay rise.



## DON'TS

- Leave an employee **without an annual objective**.
- Keep **knowledge to yourself** and **bypass feedback**.
- **Neglect the recognition of achievements** and support for **professional development**.



Want to find out more?

- **Managers**
- **Human Resources Department**

## GOOD TO KNOW



Promotion and recognition within MasterGrid are key to ensuring the **motivation and retention of our teams**, as well as **improving the company's overall performance**.

All managers and HR teams play a key role in encouraging the **professional development** of everyone, cultivating a **feedback culture** and fostering **interdepartmental collaboration and communication**.

The management team at MasterGrid is committed to **involving employees in the company's performance** through employee savings schemes and individualized remuneration.

At key moments in its development, MasterGrid also offers **equity participation schemes** for all employees who wish to participate.

## USEFUL DOCS

- Annual and professional appraisal
- Training plan
- Manager's guide
- Careers website



# Business Ethics

MasterGrid is committed to respecting national and international laws relating to anti-corruption and to carrying out its activities in compliance with the legislation, regulatory requirements and standards in force.

This commitment is based on the ongoing assessment of corruption risks, shared vigilance, the implementation of preventive actions, the daily involvement of our employees as well as the exemplary nature of our management team.

The Group has put in place measures to ensure that all MasterGrid employees and partners have access to complete documentation containing the practices to be adopted and the precautions to be taken in the context of our activities.

We know we can count on the responsibility of our employees to act with complete transparency and shared trust, in accordance with the Group's ethical values.



## DO'S

- **Promote, both internally and externally, the MasterGrid Group's culture of integrity** and ensure that the Codes of Conduct are properly applied.
- **Evaluate the risks of corruption** that may come up, depending on the nature of your activities and your co-contractors.
- **Report**, as soon as possible, **any situation presenting a risk, estimated or proven, of corruption.**



## DON'TS

- **Acts or practices that take the form of an undue advantage in order to obtain a contract.**
- **Make or accept gifts and invitations** creating conflicts of interest or constituting an act of corruption.
- **Make facilitation payments** to a public official in order to speed up an administrative procedure.

## Want to find out more?



- **Legal Department**
- **Managers**
- **Executive Management**

## GOOD TO KNOW



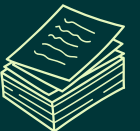
Within the MasterGrid Group, we are committed to fighting corruption and any other practice contrary to probity, adopting a policy of **zero tolerance in this area.**

In France, the 2016-1691 law dated December 9, 2016 on transparency, the fight against corruption and the modernization of economic life, known as the "Sapin II Law", **prohibits all forms of corruption and influence peddling and requires the implementation of a system** aimed at combating these practices.

Not all situations likely to be encountered are covered exhaustively. **Everyone needs to use common sense. In the event of difficulty, each employee is invited to discuss the matter directly with their line manager, the legal department or the executive management** within their company or the group. In addition, a whistleblower protection process is in place.

## USEFUL DOCS

- **Code of Business Conduct**
- **Supplier Code of Conduct**



# Brand Image and Digital Heritage

MasterGrid's intangible resources are a major source of wealth and development.

These resources are mainly made up of data collected or produced by and for the company, as well as information disseminated publicly about it, constituting its brand image. They must be protected by technical cybersecurity solutions and collective vigilance, including when using artificial intelligence. The reliability, sustainability and confidentiality of data are key issues for its exploitation and enhancement.

MasterGrid has set itself the following priorities:

- Consider intangible resources as **essential corporate assets**.
- Ensure a **positive brand image is diffused and promoted**, in line with the company's values and ambitions.
- **Value and protect** company data.
- Protect personal data and **respect confidentiality**.

## DO'S

- Use only **digital tools provided** by the company.
- **Be vigilant and report** any breach of company data.
- **Consider the impact of your actions on the company's reputation** and seek approval when in doubt.

## DON'TS

- **Take any initiative that may have an adverse effect on the company's brand image**.
- **Reveal confidential or sensitive information** about the company.
- **Disable or bypass cybersecurity tools and measures**.
- **Neglect the risks of theft**, alteration or destruction of company data.

## Want to find out more?



- IT Department
- Communication Department
- DPO (Data Protection Officer)

## GOOD TO KNOW

The company's core data is known as **Master Data**. The reliability of this Master Data is paramount.

MasterGrid is **proactive in its cybersecurity actions**, implementing advanced protection tools.

**A cybersecurity training course is provided for each new employee**, since we are all directly involved in protecting the company's data.

**The General Data Protection Regulation (GDPR)** is taken into consideration in the design of processes, as well as in the configuration of company business tools and techniques.

MasterGrid develops communication actions **with the aim of guaranteeing the consistency, conformity and proper use of the Group's brands**, in order to **preserve its image and reputation**.

## USEFUL DOCS

- IT Charter
- GDPR Regulation
- Graphic charter



# Environment

Environmental issues are at the heart of planetary concerns.

In this context, transforming and adapting our activities to minimize our footprint is essential. We are convinced that MasterGrid must **accompany the energy transition, by being exemplary, visionary and forward-thinking.**

We want to **raise employees' awareness of environmental issues**, encourage them to make proposals, and give them the means to make a positive contribution.

MasterGrid's commitment is reflected in the following priorities:

- The **renovation and reuse** of equipment and **prolonging its life span**.
- The **design of new products and solutions** in line with the energy transition.
- **Innovation** to develop alternative technologies to SF6 gas and reduce the impact associated with its use.
- The **decarbonization** of our value chain.
- **Supporting teams** to drive them towards professional expertise that takes environmental issues into account.



## DO'S

- **Prioritize local and responsible purchasing**, as well as the use of low-carbon or recycled raw materials.
- **Encourage moderation in habits**, consumption patterns and travel.
- Share ideas or solutions for **improving our environmental footprint** via your manager or by email: [rse@mastergrid.com](mailto:rse@mastergrid.com).
- **Be vigilant in environmental risk situations** and escalate alerts as quickly as possible.



## DON'TS

- **Not comply with waste sorting rules** and applicable environmental requirements.
- **Neglect environmental risk and impact analysis** in projects.
- **Ignore exclusionary policies for projects, customers and suppliers.**

Want to find out more?



- **CSR Department**
- **QHSE Department**
- **Technical and Innovation Department**

GOOD TO KNOW



MasterGrid is resolutely **committed to decarbonization** and has adopted the ACT (Accelerate Climate Transition) methodology and invested in the SBTi (Science Based Target Initiative).

We don't just comply with **local and international** environmental regulations. **Our aim is to surpass them.**

**The Group's "energy sobriety" approach is implemented across all our business activities.** Everyone has a part to play in reducing our impact.

**Concrete initiatives**, steered by the CSR department, actively contribute to **the global effort towards carbon neutrality and environmental protection.**

Environmental **awareness sessions**, in particular via **Climate Fresk**, are dispensed to all employees to ensure a shared understanding of the issues.

## USEFUL DOCS

- CSR Charter
- QHSE policy
- Exclusion policy



MasterGrid, an expert in electrical systems supporting the energy transition, manufactures equipment and provides maintenance and renovation services extending the lifecycle of electrical installations. Heir to a prestigious industrial heritage, MasterGrid was created in 2019 following the acquisition of the high-voltage assets of the Merlin Gerin brand. The company has since gone from strength to strength, consolidating its activities in France, diversifying its portfolio of products and services in medium and low voltage and exporting its expertise around the world.