01. Compliance & Ethics

▶ AT A GLANCE

All employees, Countries and Business Units are expected to behave with the highest ethical standards when conducting business with Groupe clients, suppliers, partners and wherever it does business.

FOR WHOM?

All legal entities that are controlled, either directly or indirectly, by the Groupe and by their employees.

WHAT?

The aim is that the Groupe:

- Operates with the highest ethical standards wherever it does business;
- Complies with all compulsory legislation and regulations in all the countries in which it operates; and
- Complies with Janus whenever it is more stringent than local regulations.

HOW?

- All employees, Countries and Business Units are required to comply with the laws and regulations in the countries in which they do business.
- Employees are expected to know and respect applicable laws and regulations, in addition to the Groupe's internal rules under Janus.
- All Groupe rules and procedures, including Janus, are to be applied in a manner consistent with local legislation and regulations.

If Janus ever conflicts with local law or regulations, due to a change in the law or for any other reason, the Groupe Secretary General, the Groupe CFO and the Groupe General Counsel must be informed, as soon as possible.

If local legislation is more stringent than Janus, the local legislation must be applied.

- Employees are also expected to comply with any agreement applicable to them or their work, including confidentiality agreements and agreements with the Groupe's clients and partners.
- Compliance and ethics violations by employees may result in disciplinary action, which may include termination of employment.

No external counsel may be hired without the approval and continued involvement of the Country Head of Legal or the Groupe General Counsel.

WHO?

It is the responsibility of CEOs and CFOs to ensure that Country and Business Unit business is operating in an ethical manner consistent with Janus as well as applicable laws and regulations.

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