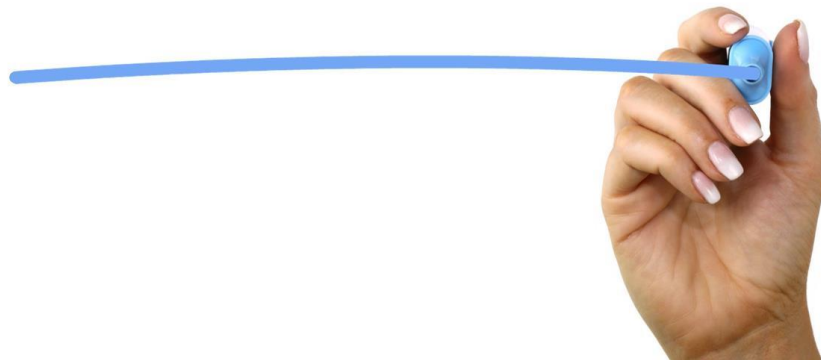


# CIS Policies

POLICIES



FR-01-MNL-0001-ver.006

## 1 Introduction

This manual contains the high-level documents of the integrated excellence management system (IEMS), namely policies and strategic documents.

The essence of these documents determines how the IEMS processes are expected to be implemented and deployed. They should be therefore reflected in all Group's activities of all functions, without exception.

## 2 Review, approval, revision and identification of changes

Reviewed by (job title)	Change management requested by Process Owner (Yes/No)	Approved by (job title)	Validated by	Version (Nº and date)	Changes (chapter/reference)
Group Director of QHSE & SD	No	Group Director of QHSE & SD	Group Director of QHSE & SD	02 26/04/2019	Added FR-01-POL-0010 - Policy on Gifts and Invitations
Group Director of QHSE & SD	No	Group Director of QHSE & SD		03 03/05/2019	IEMS acronym defined. Document approved by the CEO.
VP of QHSE & SD	No	Chairman & CEO		04 31/01/2020	Added: <ul style="list-style-type: none"> <li>FR-01-POL-0001-ver.003 - Quality and Commitment to Excellence Policy</li> <li>FR-01-POL-0005-ver.001 - Information Systems Security Policy</li> </ul>
VP of QHSE & SD	No	Chairman & CEO		05 07/06/2022	Added: <ul style="list-style-type: none"> <li>FR-01-POL-0011-ver.001 - Purchasing Policy</li> </ul>
VP QHSE & SD	No	Chairman & CEO		06 16/12/2022	Added: <ul style="list-style-type: none"> <li>FR-01-POL-0012-ver.001 - Modern Slavery and Human Trafficking Policy</li> <li>FR-01-POL-0013-ver.001 - Personal Data Protection Policy</li> <li>FR-01-POL-0014-ver.001 - Anti-Harassment Policy</li> </ul>

## 3 Contents

- FR-01-POL-0001 - Quality and Commitment to Excellence Policy
- FR-01-POL-0002 - Sustainable Development Policy
- FR-01-POL-0003 - Occupational Health and Safety Policy
- FR-01-POL-0004 - Food Safety Policy
- FR-01-POL-0005 - Information Systems Security Policy
- FR-01-POL-0006 - Health and Wellness Policy
- FR-01-POL-0007 - Psychoactive Substance Abuse Policy
- FR-01-POL-0009 - Road Safety Policy
- FR-01-POL-0010 - Policy on Gifts and Invitations
- FR-01-POL-0011 - Purchasing Policy
- FR-01-POL-0012 - Modern Slavery and Human Trafficking Policy
- FR-01-POL-0013 - Personal Data Protection Policy
- FR-01-POL-0014 - Anti-Harassment Policy
- FR-01-STR-0001 - Values, Vision and Mission
- FR-01-STR-0002 - CIS Excellence Management Principles

Our business is to provide catering, accommodation services, supply chain and engineering solutions, and facilities management for thousands of people around the world working on major projects.

Our capacity to manage remote sites anywhere in the world, along with the outstanding level of professionalism of our teams and consistently high quality of our services are today well known around the globe.

In order to maintain and to improve the effectiveness and efficiency of our services, I committed to a quality process which is ISO 9001 certified since February 2004.

All the necessary means and resources are implemented for the achievement of this project, which aims to:

- Consolidate CIS' position as a major player tendering for new business.
- Improve the effectiveness of our Organisation working methods.
- Reinforce the interface between Head Office and the sites.
- Render constant the quality of our services and meet increasing expectations of our customers, especially regarding QHSE matters.
- Provide services in accordance with the legal requirements applicable to our activities, requirements of the different interested parties, reference standards and other requirements that are included in the scope of Quality.

The CIS Integrated Excellence Management System – which includes the Quality Management System – objectives are periodically reviewed, revised, measured and analysed.

Being our first concern the satisfaction of our clients and consumers, I ask each staff member, including those based on site, to continue being actively involved in this collective and global project.

Régis Arnoux, Chairman & CEO

The belief of the CIS Group is that the success and sustainability of any organisation can only be achieved through an ambitious, yet realistic, sustainable development policy.

Based on Universal Declaration of Human Rights, International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, Rio de Janeiro Declaration on Environment and Development, and United Nations Convention Against Corruption, and articulated around its Integrated Excellence Management System, the CIS Group's Sustainable Development Policy is based on the following fundamental principles:

1. The CIS Group shall support and respect the protection of human rights.
2. The CIS Group shall ensure that they are not complicit in human rights abuses.
3. The CIS Group shall respect the freedom of association and effective recognition of the right to collective bargaining.
4. The CIS Group does not accept any form of forced and compulsory labour.
5. The CIS Group does not accept child labour.
6. The CIS Group does not tolerate discrimination.
7. The CIS Group shall apply the precautionary approach to environmental challenges.
8. The CIS Group shall take all necessary initiatives to promote greater environmental responsibility.
9. The CIS Group shall encourage the development and diffusion of environmentally friendly technologies.
10. The CIS Group shall act against all forms of corruption, including extortion and bribery.

Régis Arnoux, Chairman & CEO

The health and safety of people are a fundamental pillar of the CIS Group. The goal for zero incidents permanently remains a top priority.

Therefore, no service or activity should be undertaken to the detriment of the health and safety of anyone.

The CIS Group is committed to providing all its employees with safe and healthy working conditions. In return, CIS employees have the mission - and the duty - to:

- Participate in the improvement of safety at work and act proactively to prevent any accident or material damage;
- Continually identify, assess and manage risks to perform all services safely;
- Promote a culture of proactive intervention and promote any awareness-raising initiative or improvement of safety;
- Strictly apply emergency response procedures;
- Stop any task or activity that may create an unacceptable risk to the health and safety of any person.

Régis Arnoux, Chairman & CEO

The CIS Group is committed to providing safe and quality catering services to their customers and residents. As well as acknowledging its responsibility for food safety, ensuring that the provision of all food and beverage is safe and fit for human consumption. Functioning on the principles of Hazard Analysis and Critical Control Point (HACCP) and ISO 22000 management system standard requirements, the CIS Group operates a comprehensive risk based quality food safety management system.

Consequently, through its Integrated Excellence Management System, the CIS Group *shall* incorporate the following principles:

- Applying a HACCP methodology to identify and control critical food safety risks in all food operations;
- Complying to statutory and regulatory standards related to food safety and quality;
- Implementing safe working practices to control the assessed premises, equipment, practices and people;
- Effectively managing, coaching and developing identified food suppliers;
- Implementing effective systems of traceability and recall within the supply chain;
- Ensuring the implementation of adequate health and hygiene procedures, including safe practices for handling, preparing, storing and serving food;
- Providing information, instruction, training and supervision to all employees;
- Reporting food safety incidents, with investigation to prevent any recurrence;
- Maintaining records and data of food safety performance;
- Monitoring and verifying food safety performance by periodic audits and inspections;
- Continuously improving the ability to consistently provide safe and quality food products and catering services that meet client requirements;
- Fostering opportunities to enhance customer satisfaction.

Régis Arnoux, Chairman & CEO

**The CIS Group Information Systems Security Policy contributes to:**

- Ensure the continuity of the CIS Group's activities.
- Prevent leakage of sensitive information.
- Build the confidence of Group employees in the use of the resources made available to them.

**This policy defines the security measures applicable to the Information Systems of the CIS Group. It is based on 10 strategic principles:**

1. When mastery of its Information Systems requires it, the CIS Group calls on trusted operators and service providers.
2. Any Information System of the CIS Group must be subject to a risk analysis allowing a preventive consideration of its security, adapted to the challenges of the system considered. This analysis is part of a process of continuous improvement of system security, throughout its lifetime. This approach should also make it possible to keep up to date an accurate mapping of the information systems in service.
3. The human and financial resources devoted to the security of Information Systems of the CIS Group must be planned, quantified and identified within the global resources of Information Systems.
4. Strong authentication methods for CIS Group employees on Information Systems must be put in place.
5. The CIS Group's Information Systems management and administration operations must be traced and controlled.
6. The protection of Information Systems must be ensured by the rigorous application of precise rules. These rules are the subject of the guidelines for the security of Information Systems.
7. Each employee of the CIS Group, as a user of an Information System, must be informed of their rights and duties but also trained and made aware of cybersecurity. The technical measures implemented by the CIS Group in this area must be known to all.
8. Administrators of Information Systems must apply, after training, the basic rules of cyber hygiene.
9. The products and services acquired by the various departments and intended to ensure the security of the CIS Group Information Systems must be subject to an assessment and prior validation of their level of security by the person responsible for the Information System Security of the CIS Group.
10. Information considered sensitive, due to its confidentiality, integrity or availability needs, is hosted on the Information System of the CIS Group.

Régis Arnoux, Chairman & CEO

The CIS Group is committed to provide a healthy workplace that values and enhances the health and wellness of all employees.

Consequently, through its Integrated Excellence Management System, the CIS Group *shall* incorporate the following principles by:

1. Establishing best practices for healthy eating, physical activity and wellness.
2. Increasing employee's knowledge and awareness on key health topics.
3. Promoting healthy eating and supporting employees in making healthy food choices.
4. Encouraging employees to take personal responsibility for their own health and wellness.
5. Encouraging employees to be more physically active by making provisions in the workplace for activity.
6. Promoting a smoke free workplace environment and supporting workers to quit smoking.
7. Engaging with other stakeholders to support employee's wellness through workplace good practices.
8. Identifying and complying with laws and regulatory requirements of the country of operation and other internationally recommended standards.

Régis Arnoux, Chairman & CEO



The CIS Group is committed to maintaining a safe, healthy and productive work environment free of the misuse of drugs, alcohol, solvents and related substances. Abuse of these substances not only impairs an employee's health and performance but can also create unsafe working conditions for other employees. Therefore, no service or activity should be undertaken to the detriment of the health and safety of anyone.

The CIS Group is committed to providing all its employees with safe and healthy working conditions. In return, no employee from the CIS Group shall:

1. report or try to report for work when considered unfit due to alcohol or drugs (whether illegal or not) abuse;
2. be in possession of alcohol or illegal drugs in the workplace;
3. supply others with illegal drugs in the workplace;
4. supply others with alcohol in the workplace, except during work duties. For example, serving customers drinks at the bar;
5. consume alcohol or illegal drugs or abuse any substance whilst at work.

In addition, CIS employees shall:

1. ensure they are aware of the side effects of any prescription drugs;
2. advise their line manager or a member of the management team immediately of any side effects of prescription drugs, which may affect work performance or the health and safety of themselves or others.

The concerned CIS Group Organisation shall take disciplinary action for any breach of these rules, which may include summary dismissal.

When there is reasonable belief that an individual is under the influence of alcohol or drugs on reporting for work or during the course of work, (for example if there was a strong smell of alcohol on the person's breath), they must be sent home immediately. A search may also be carried out in line with Customer's policies. In addition, possession of or dealing in illegal drugs on CIS or customer premises shall, without exception, be reported to the Police authorities.

The CIS Group shall endeavor to ensure that advice and help are made available to any employee who feels he/she has a problem with alcohol or drug misuse. In the first instance, individuals will be encouraged to seek help from their general practitioner. It may occasionally be necessary to request that the employee refrains from work temporarily or undertakes restricted duties to ensure his/her own safety and that of others. The concerned CIS Group Organisation may also allow additional time off (normally unpaid) for employees to obtain treatment or attend supporting groups.

Any employee who seeks the assistance of any CIS Group Organisation in finding treatment for a drugs or alcohol problem has the Group's complete assurance of confidentiality.

Régis Arnoux, Chairman & CEO

The safety of people is a fundamental pillar of the CIS Group. The goal for zero incidents permanently remains a top priority.

The CIS Group is committed to ensuring safe transportation conditions to people and goods. Driving is among the most hazardous tasks performed by CIS employees.

Consequently, through its Integrated Excellence Management System, the CIS Group *shall* incorporate the following safe driving practices:

1. It is strictly forbidden to drive under influence of psychoactive substances.
2. It is strictly forbidden to smoke in the vehicles.
3. The phone can be left on during a trip, but before answering or texting, the driver must leave the road safely and stop the vehicle.
4. All vehicles (owned, contracted or leased) must be fitted with seat belts for each occupant.
5. Seat belts must be worn by all occupants during any trip.
6. All drivers must have in their possession a valid driving licence.
7. Respect the speed limits and keep safe distances from other vehicles.
8. Always check the vehicle and fill the vehicle inspection form before a trip.
9. Anticipate the movements from the other vehicles, pedestrians, and animals.
10. Take regular and adequate rest breaks and stop when tired.
11. Report any incident, including those that do not result in damage or injury.
12. All vehicles must be equipped with a fire extinguisher and a first aid kit.
13. Plan the journey ahead and use the journey management tools.
14. Drivers must not use CIS vehicles for personal needs.
15. All vehicles (owned, contracted or leased) must be insured, and have passed through documented technical inspections, as per manufacturer recommendations and regulatory requirements.

Régis Arnoux, Chairman & CEO

In pursuance of our constant opposition to any form of corruption, the CIS Group has adopted the French MiddleNext Anti-Corruption Code of Conduct which, in turn, refers to the United Nations Convention against Corruption.

This policy statement is intended to inform all CIS employees on the sensitive question of *gifts* and *invitations*, whether received or given, and to complete the MiddleNext Anti-Corruption Code of Conduct.

A «*gift*» is a benefit, of any nature, offered or received by a CIS Group employee.

An «*invitation*», with or without travel, may be:

- either professional, within the framework of CIS business development or business management (restaurant, event, congress, study tour, site visit, conference, trade fair ...);
- or personal (leisure activities): in this case, the invitation constitutes a *gift*.

*Gifts* and *invitations* are part and parcel of business life, considered tokens of courtesy which allow partners to maintain excellent professional relationships. In certain circumstances, however, *gifts* and *invitations* may resemble or be perceived as corrupt practices and thus be considered as the means of influencing a decision or favouring a company or an individual.

Thus CIS accepts that its employees may offer and receive gifts and invitations, on condition that the principles traced in this policy are respected.

All *gifts* and *invitations* received or offered by a Group employee must respect the following principles:

1. they must not entail any obligation, counterpart or unfair advantage;
2. they must be reasonable;
3. they must be open, clear and above-board;
4. they must comply with applicable procedures, legislation and regulations.

This policy may be completed by one or more specific procedures, within each CIS Group entity, notably to allow for local regulations and particularities. These specific procedures may define rules which are stricter than the present Group policy, but under no circumstances can these rules be less strict.

Régis Arnoux, Chairman & CEO

As an integrator of services in extreme environments operating internationally, the CIS Group aspires to establish relationships with all its suppliers based on trust and mutual respect, to share fair practices and, in the same way, to establish lasting relationships. In order to maintain and strengthen this trust, we have established operating principles to comply with regulatory, ethical, and business conduct requirements applicable to the entire CIS Group.

These principles are based on three strategic orientations, which form the foundation of our Purchasing Policy.

**1. Buy the best quality, at the best price, in the best timeframe and under the best conditions**

Buying products and services at the highest level of quality and traceability, delivery time and price, allows us to increase our performance while guaranteeing the full satisfaction of our customers. Our local Purchasing teams and our Group Purchasing organisation at the Head Office are constantly working together to achieve this objective.

**2. Establish a long-term relationship with our suppliers**

Considering our suppliers as players in our performance places them in a privileged relationship. The following points are emphasised in managing sustainable relationships with our suppliers:

- Promote ethical practices and secure the purchasing and supply processes.
- Respect people, their safety, the corporate social responsibility approach, image, and reputation.
- Maintain a diversity of local and international suppliers.
- Innovate and share know-how.
- Ensure a regular dialogue with our suppliers.

**3. Prioritise local sourcing**

With the desire to contribute to the development of the local economy in our countries of operation, the Purchasing teams aim to promote relations with local suppliers by giving priority to short circuits, while respecting our desire to achieve the highest level of performance in terms of corporate social responsibility.

Régis Arnoux, Chairman & CEO

Modern slavery can be defined as exercising over a person the attributes of the right of ownership or maintaining a person in a state of continuous subjection by compelling him or her to perform labour or sexual services, begging, or any other unpaid service. It is a heinous crime<sup>1</sup> and a morally reprehensible act that deprives a person of his or her freedom and dignity for the benefit of another person. It is a real problem for millions of people around the world who are held and exploited in various forms of slavery.

Any company can be implicated in such a crime through its operations and supply chain. The CIS Group operates responsibly and ethically. With over 13,000 employees, we support major players in the oil and gas, mining, construction, and defence sectors at every stage of their projects, in the most remote urban, industrial, offshore and onshore environments, in nearly 20 countries. We use suppliers around the world to provide turnkey services and solutions. As part of this, we take a zero-tolerance approach to modern slavery, as well as other forms of slavery such as forced labour, and are committed to preventing slavery and human trafficking in our operations and supply chain.

For example, we are committed to ensuring compliance with slavery and human trafficking laws in the countries where we operate and expect our partners and suppliers to do the same. We also ensure that there is no modern slavery or human trafficking in our operations. CIS has a code of conduct that encourages employees and relevant external stakeholders to do the right thing by clearly stating the actions and behaviour expected of them when representing the company. We strive to maintain the highest standards of conduct and ethical behaviour in our operations and the management of our services.

In terms of accountability and prevention of modern slavery, the CIS Group's top management is responsible, in close collaboration with the human resources and internal control staff, for the implementation of the principles against modern slavery. The supply chain team deploys our supply chain risk assessment to ensure that the CIS Group's supply chain measures are effective and adhered to.

The CIS Group's policy on modern slavery and human trafficking is deployed across all CIS Group Affiliates. The CIS Group employees and stakeholders are encouraged to report through the Group's alert system any suspicion of modern slavery in all areas of the CIS Group's activities as well as at its customers' or suppliers' sites.

The CIS Group will punish any practices that violate the correct application of this policy. Depending on the case, such an infringement will be subject to disciplinary or contractual measures (e.g. dismissal or termination of business relations).

NOTE:<sup>1</sup> Defined as such by the UN.

Régis Arnoux, Chairman & CEO

In the course of and for the purposes of its activities, the CIS Group collects and processes, on a mandatory or voluntary basis, certain types of personal data about the people with whom it interacts. That includes current, past, and future employees, service providers, customers, and other persons with whom the CIS Group communicates.

"Personal data" means any information relating to an identified or identifiable natural person. An "identifiable natural person" is a natural person who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier, or to one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity.

The CIS Group is committed to ensuring that the processing of personal data is carried out in compliance with the various national and European regulations and laws that regulate the issue, and in particular with the French law No. 78-17 of 6 January 1978, known as the "*Informatique et liberté*", reformed in 2004, and European Union regulation 2016/679 of 27 April 2016 on the protection of personal data. Furthermore, the CIS Group minimises the collection of personal data to the strict minimum necessary (data minimisation).

The collection of personal data is accompanied by information on, among other things, the purpose of the collection, the legal basis for the processing of the data, the mandatory or optional nature of the collection of the data, the recipients of the data, the duration of the data storage, and the possible existence of data transfer outside the European Union or of automated decision-making.

The CIS Group is committed to protecting the personal data collected in the course of its activities. Access to this information is only possible with the prior consent of the person concerned, with the exception of information and formalities required to comply with legal obligations in each country where the CIS Group operates.

Employees responsible for keeping records or who have knowledge of personal information about employees of the Group, or any other person, guarantee that this information will not, under any circumstances, be improperly or illegally disclosed.

If you have any queries regarding the personal data protection policy implemented at the CIS Group, please contact [privacy@cis-catering.com](mailto:privacy@cis-catering.com).

Régis Arnoux, Chairman & CEO

The purpose of this policy is to ensure a healthy working environment, make employees and stakeholders aware of the seriousness of harassment, and prevent it in all its forms. This applies to all the CIS Group employees, as well as to any person in contact with the CIS Group (supplier, partner, client, subcontractor, etc.). The CIS Group's top management is committed to the mental and physical health of its employees and to ensuring a harmonious working environment that is free from all forms of harassment.

Harassment in any form constitutes an attack on the dignity of the individual. It may consist of repeated verbal, physical, or psychological acts with the purpose or effect of degrading working conditions in a way that is likely to infringe on the rights and dignity of the person, alter his or her physical or mental health, or compromise his or her professional future. This may include comments, jokes, intimidation, caricatures, or any act that undermines the dignity of the person. Retaliation against a person who has reported harassment may also constitute harassment. Any unfair distinction based on gender, sexual orientation, religion, nationality, health status, or social origin also constitutes harassment.

The harasser does not need to have a hierarchical relationship or be in a position of authority in relation to the victim, whether male or female. However, abuse of authority, as well as attacking a particularly vulnerable person, are aggravating circumstances. Thus, managers are expected to act as role models on all occasions, enforcing the highest standards of conduct and promoting a working environment free from any form of discrimination, harassment or abuse of power.

The CIS Group does not tolerate any form of harassment and is committed to taking all necessary steps to protect the physical and psychological integrity of individuals and to safeguard their dignity. All employees and stakeholders must contribute to the creation of such an environment. The prevention of harassment is the responsibility of everyone at the Head Office's level and in all CIS Group Affiliates. Employees and stakeholders are encouraged to report and denounce any incident or suspicion of harassment in the workplace.

All allegations of harassment must be taken seriously. In the event of a complaint of harassment, the CIS Group's top management is committed to taking the necessary steps to identify the perpetrator and to put a stop to it, in full confidentiality with regard to the persons concerned.

Both the perpetrator and any person that has tolerated the harassment will be sanctioned. False allegations of harassment will also be sanctioned. Sanctions may be disciplinary, civil or commercial, depending on the case. Sanctions taken by the employer and those taken by the courts may be cumulative.

Régis Arnoux, Chairman & CEO

## **Values of the CIS Group**

Integrity  
Respect  
Excellence  
Responsibility  
Boldness  
Passion

## **Vision of the CIS Group**

To become the international reference operator for integrated services in the oil, gas, mining, infrastructure and defense markets.

## **Mission of the CIS Group**

To pursue a lasting relationship with its customers, partners and employees, based on trust and the quality of its services.

To increase its expertise of international catering and integrated services, relying on its know-how, values and human capital.

To offer reliable, innovative and competitive solutions to ensure the continuous satisfaction of its customers.

To respect the applicable laws and regulations as well as its code of conduct.

Régis Arnoux, Chairman & CEO



**1. Safety and security imperative**

Safety and security are the number one priority for the CIS Group.

**2. Customer satisfaction**

Meeting – and exceeding – customer needs is the primary focus of excellence management and will contribute to the long-term success of the Group. It is important to not only attract but also retain the confidence of our customers, so adapting to their future needs is key.

**3. Business ethics and compliance**

Confidence cannot be bought by decree – it has to be earned. The CIS Group builds that trust by placing integrity, ethics, honesty, and transparency at the heart of all its practices.

**4. Leadership**

Having a unified direction or mission that comes from strong leadership is essential to ensure that everyone in the Group understands what we are trying to achieve.

**5. Engagement of people**

Creating value for our customers will be easier if we have competent, empowered and engaged people at all levels of our Group.

**6. Process approach**

Understanding activities as processes that link together and function as a system helps achieve more consistent and predictable results. People, teams and processes do not exist in a vacuum and ensuring everyone is familiar with the Group's activities and how they fit together will ultimately improve efficiency.

**7. Continual improvement**

Successful organisations have an ongoing focus on improvement. Reacting to changes in the internal and external environment is necessary if we want to continue to deliver value for our customers. This is of paramount importance today when conditions evolve so quickly.

**8. Evidence-based decision making**

Making decisions is never easy and naturally involves a degree of uncertainty, but ensuring our decisions are based on the analysis and evaluation of data is more likely to produce the desired result.

**9. Relationship management**

Today's businesses and organisations do not work in a vacuum. Identifying the important relationships we have with interested parties such as our suppliers – and setting out a plan to manage them – will drive sustained success.

**10. Risk-based thinking**

Risk-based thinking enables the Group to determine the factors that could cause its activities to deviate from the planned results, to put in place preventive controls to minimise negative effects and to make maximum use of opportunities as they arise.

**11. Sustainable development**

The overall goal of sustainable development is the long-term stability of the economy and environment, only achievable through the integration and acknowledgement of economic, environmental, and social concerns throughout the decision-making process.