

LEM Group Environment, Health and Safety Policy

We are committed to protecting the environment, the health, and safety of our employees as part of our code of conduct.

Our Principles

We support and respect the protection of internationally proclaimed human rights and make sure that we are not complicit in human rights abuses.*

We provide safe & healthy working conditions.*

We commit to protect our employees and colleagues against harassment in the workplace, in particular against any kind of sexual, physical or psychological abuse.*

We support a precautionary approach to environmental challenges, we undertake initiatives to promote greater environmental responsibility and we encourage the development and diffusion of environmentally friendly technologies.*

We commit to be in compliance with all relevant laws and other applicable standards.

Our application

We foster a culture within the organization in which misconduct is never acceptable. All our employees, including our top-level management, are constantly committed to preventing any misconduct of our stakeholders.

We assess the nature and extent of our exposure to potential external and internal risks. This assessment is periodic, informed and documented.

We apply due diligence procedures, taking a proportionate and risk-based approach in order to mitigate identified risks.

We seek to ensure that our policies and procedures are embedded and understood throughout the organization through internal and external communication, including training.

We continuously monitor and review procedures and make improvements where necessary.

We count on you, our employees, to apply our principles.

Any queries concerning these principles, or reports on their violation, need to be addressed to line managers or the Human Resources department of your workplace or escalated to corporate via speakup@lem.com. Environmental issues shall alternatively be reported to the Environment, Health and Safety manager.

Employees reporting a violation in good faith do not have to expect any negative consequences. Such reports shall be treated with the appropriate confidentiality and anonymity.

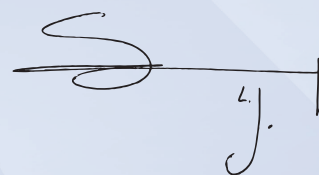
We do not prohibit anonymous reports, but in order to guarantee adequate investigation, we clearly encourage identifiable reports.

Any employee who violates the law or any of the company's policies or this Code of Conduct is subject to disciplinary action including and up to termination of employment.

Geneva, July 2014



François Gabella,
LEM Chief Executive Officer (CEO)



Sylvain Leroux
LEM Environment, health and safety Manager

* As defined in the UN Global Compact and specified in the UN Supplier Code of Conduct