

# **ETHICS CHARTER**

## A word from our partners



Paris, 26 February 2025

Dear all,

Our firm was founded and is united by a common passion: to defend.

Regardless of the field, whether it be advisory, compliance, or litigation, we work to defend those individuals and entities who place their trust in us. We are driven by the belief that upholding the rights of an individual or a company contributes to building a world of justice, freedom, and democracy.

This passion and conviction are reflected in our fundamental values.

This Charter embodies these values. It is intended to apply within our firm as well as in our relationships with our clients and partners.

Each and every one of us has a duty to respect it, to bring it to life, and even to embody it.

A handwritten signature in blue ink, consisting of a large, stylized 'W' followed by a long horizontal stroke that curves upwards at the end.

William Feugère

A handwritten signature in blue ink, appearing to be 'Moizan' in a cursive, stylized font.

Antoine Moizan

## The firm's values

The Firm's Values unite us and are our strength. They guide every moment of our lives and our work. We will be uncompromising in upholding them

### *Our values*

**Ethics.** Integrity is a guarantee of trust, value and progress.

**Humanism.** Every situation involves a human issue - freedom, honour, reputation - which we make our priority.

**Respect.** Respect for others, the consideration that must be shown in all circumstances, is part of the social contract.

**Commitment.** Our job is to commit ourselves to our customers with vigour and determination.

**Boldness.** Daring to challenge assumptions, innovating, and questioning ourselves are the best ways to find the most effective strategy.

These principles are intended to be applied at all times, both in the handling of cases and in the internal management of the firm. They are not limited to moral considerations or rules of law, but are intended to promote honest and exemplary professional behaviour.

## Scope

The Ethics Charter defines the principles and values that constitute the fundamentals of FEUGERE MOIZAN AVOCATS (the "**Firm**") and to which each of its members adheres.

The Charter applies to all members of the Firm: partners or associates, legal advisers, employees, trainees, etc. (together referred to as "Associates"). The firm therefore asks all its associates to comply with these rules, including in the context of their personal files.

We also expect our Customers, Suppliers and Partners to comply with them.

As a result, this Charter is appended to our Articles of Association, to our Contracts for self-employed persons or for employment and to our General Terms and Conditions.

We will be uncompromising in our compliance; any breach may lead to the termination of the current contractual relationship.

## AS A LAW FIRM

The principles and values set out in this Charter are intended to apply to our practice as lawyers.

### I. Ethics of the legal profession

We are lawyers, regulated professionals, actors of justice, bound in our personal and professional lives to respect the Ethics of our profession, based on our oath and our Essential Principles, enshrined in the National Internal Rules of Lawyers (RIN) and the Internal Rules of the PARIS Bar (RIBP).

Each of us carries out our duties with dignity, conscience, independence, probity and humanity, in accordance with the terms of our oath as lawyers.

#### - **Strict compliance with professional secrecy**

Professional secrecy is a guarantee of Rights and Freedoms and a guarantee of Justice. Without the protection of client confidentiality, there can be no advice or defence. Each member of the firm undertakes to respect professional secrecy and confidentiality in all activities and in all circumstances.

Similarly, we respect the secrecy of investigations and enquiries in our judicial activities and the confidentiality (*foi du Palais*) in our dealings with other players in the justice system, in particular magistrates.

We will not accept any pressure or any breach of our secrecy and confidentiality. Any attempt to do so must be reported immediately and may result in the termination of relations with the perpetrator.

The Firm has also ensured that its customers' data is kept securely by adopting an Information Technology Charter which complements the present Charter and is binding with the same force.

- **Managing conflicts of interest within the firm**

As lawyers, our role is to defend the interests of our clients, in accordance with the law and our principles and values.

Each of our decisions must be taken objectively, and we must refrain from any activity that could run counter to the interests of the firm or those of our clients.

The notion of conflict of interest must be taken in its broadest sense, encompassing both actual and real conflict and apparent or potential conflict, which may equally harm the rights or reputation of the persons concerned.

- **Independence**

The quality of our advice and defence depends on our independence. We will not accept or continue any assignment where there is a risk of this principle being compromised.

This is particularly true of our internal investigations: our mission is to assess the veracity of the facts submitted to us, with complete independence and impartiality, and we will not accept any pressure.

- **A culture of excellence**

We owe our customers the highest level of expertise, so that we can offer them the best strategy and the best advice.

In this respect, the firm expects all its lawyers not to confine themselves to fulfilling their continuing education obligations under article 85 of decree no. 91-1197 of 27 November 1991, and we encourage them to take further courses to develop their skills.

Moreover, we are convinced that knowledge and expertise grow through sharing. We promote internal exchanges among partners and associates, with teamwork enriching individual reflection. We also encourage our Associates to publish and provide training, particularly for students, legal professionals, and businesses.

With this desire to bring together and develop the skills of each member, FEUGERE MOIZAN AVOCATS is a co-founder of the "COMPLIANCE LEAGUE" network, has forged partnerships with other law firms and is a member of national and international associations, enabling it to mobilise at any time a tailor-made team of experts to deal with the most complex cases as efficiently as possible.

- **Ethical and respectful communication**

In all our communications, whether written or oral, and in particular in all our correspondence or on social networks, we respect the principles of prudence, moderation and courtesy.

Lawyers are professionals when it comes to the spoken and written word, and they must always be vigilant about the scope and impact of the terms they use in all their dealings, whether with clients, adversaries, the courts or any other person with whom we come into contact in the course of our work.

In the course of our work, we may need to communicate with the media. Our Firm is concerned about the image it conveys and its reputation, which has an impact on that of its clients, and *vice versa*. Any communication with the media by a member of the Firm must respect the essential principles of the legal profession and the Firm's Values. No communication may be made in the name of the Firm without the express prior consent of one of the partners.

## **II. Compliance with applicable regulations**

### **- Rules on Anti-Money Laundering and Combating the Financing of Terrorism / Compliance with Sanctions**

The Firm scrupulously complies with the provisions relating to the fight against money laundering and the financing of terrorism, in particular for the assignments listed in Article L.561-3 of the French Monetary and Financial Code. We refrain from participating in any transaction whose purpose or aim is to conceal the fraudulent origin of funds.

These provisions are naturally intended to apply without prejudice to the strict observance of lawyer-client confidentiality.

In addition, the firm scrupulously respects the provisions of national and international sanctions and refrains from collecting any sum from a sanctioned country, person or entity.

The practical arrangements for complying with these regulations are set out in the internal customer relations procedure and in the Firm's LCB-FT procedure.

### **- Ethics in data processing**

In the course of its activities, the Firm processes personal data.

The Firm is committed to handling personal data responsibly and in accordance with applicable laws and regulations.

Therefore, we ensure that individuals affected by our data processing are well-informed about the type of information we collect and how we use it.

The practical aspects of compliance with these regulations and the rights of the individuals concerned are specifically governed within the Firm.

### **- The firm's commitment to fighting corruption**

The Firm is firmly committed to the fight against corruption. Consequently, its employees are asked to refrain from any act that could be construed as corruption or influence peddling.

As such, the Firm undertakes to :

- Conduct business with loyalty, sincerity and integrity;
- Ensure that its partners, customers, subcontractors and suppliers respect its Values;
- Refrain from any act that could be considered criminal or contrary to the spirit of this Charter.

With its expertise in the fight against corruption, the Firm asks each of its Associates to be particularly vigilant in this area.

### ***Focus on gifts and invitations***

In the context of client relationships, it may be customary to offer or receive gifts, invitations, or other forms of hospitality.

Offering and receiving gifts and invitations can be a simple sign of courtesy and contribute to the smooth running of the client relationship. However, these gifts and invitations should not aim to compromise the independence of the recipient by creating a sense of obligation towards the giver.

Therefore, any gift or invitation, whether received or offered, must be reasonable, proportionate, in accordance with this Charter, and without any expectation of return or reciprocity.

Similarly, in the context of a tender process, it is strictly forbidden to offer gifts and invitations to individuals who have issued the tender, as well as to accept an invitation from them. The provision of gifts or invitations should never aim to secure a case or contract with a client. Any gift or invitation, regardless of its value, must be declared to a partner.

No gifts or invitations are permitted, regardless of their value, in relations with public officials or private individuals entrusted with a public service mission or acting as delegates of public authority.

### **- Compliance with insider information**

The Firm's lawyers deal with cases involving listed companies, whether clients or opposing parties.

In this respect, the Firm's staff may be aware of information that is classified as inside information and likely to have a significant influence on the price of related financial instruments.

The Firm's employees shall refrain from using the above-mentioned information acquired through third parties, or during contact with clients, for the purpose of buying or selling financial instruments.

It is also forbidden to pass on this type of information to another person, in order to prevent that person from carrying out transactions in financial instruments on the basis of this information.

## **AS AN EMPLOYER**

### **Ensuring good working conditions**

The legal profession is practised in a spirit of respect, trust, autonomy and independence.

Our firm is therefore committed to respecting the well-being and safety of all its staff, whatever their status, including the balance between personal and professional life and the ability to organise their working hours and to telework, in transparency and coordination with the partners and other members of the firm to ensure collective efficiency and team cohesion.

The liberal nature of the legal profession means that each Associate has the opportunity to develop his or her own personal clientele and to do so benefits from the resources of the Firm, as well as being able to seek advice and support from the Partners at any time.

### **The role of managers**

Everyone in the firm must be able to progress and develop professionally. The role of managers is to support and coach our talents, by listening, advising and showing a caring attitude.

Each employee will receive constructive feedback on the work they have done, always with respect.

We strive to create the conditions for an ongoing dialogue that will build a relationship of trust.

If a manager does not know how to answer an employee's question, he or she will advise the employee on the person best placed to provide information and support.

### **Encouraging equality, diversity and inclusion**

The Firm is committed to respecting human rights.

Equality and diversity are human and intellectual assets.

No form of discrimination will be permitted against persons, in particular on the grounds of their origin, sex, marital status, pregnancy, physical appearance, state of health, disability, morals, sexual orientation, gender identity or age, their political opinions, their trade union activities, their status as whistleblower, facilitator or person in a relationship with a whistleblower, their actual or supposed membership or non-membership of a particular ethnic group, nation, alleged race or religion, without this list being exhaustive.

The Firm ensures that these principles are respected in the recruitment of its staff, as well as in their integration, through the prism of working conditions, training and promotion.

In addition, everyone must behave in a way that respects others and our Values. No form of harassment, moral or sexual, will be tolerated.



## AS A CORPORATE CITIZEN

### **Environmental and climate issues**

The firm is committed to limiting the impact of its activities on the environment and climate.

This is how we monitor our energy consumption and waste treatment. When travel is not essential, we give priority to videoconferencing. When we do have to travel, we give priority to soft mobility (train rather than plane, for journeys of less than 4 hours, electric or biofuel vehicles).

The Firm also applies a "zero paper" policy.

### **Citizenship and democratic and republican values: working for a fairer world**

The Firm is committed to democratic and republican values, human rights and the principles of freedom, equality and fraternity.

As agents of justice, contributing to respect for rights and freedoms, we have a duty to put our skills at the service of the underprivileged or causes of general interest. We therefore devote part of our time and human resources to *pro bono* activities and encourage the associative activities of our members.

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