

Compliance Policy

Values & business conduct guiding
principles





In today's business environment, ethical behaviour and compliance constitute priority requirements for addressing client and other stakeholder expectations, testifying to our credibility and an enabler for our future successes.

Our clients expect from Yole and its partner companies that our broad range of “More than Moore” market research and strategy consultancy services which are designed to help our customers understand markets and follow technology trends to develop their business are rendered in compliance with the highest ethical standards and applicable laws and regulations.

Furthermore, our processes (to collect, store and analyse data thru interviews or by other means, then, subsequently, using our analytical skills and knowledge, to supply consolidated data to our customers thru our research and due diligence reports), must respect the legitimate rights of our clients, sources of information and other stakeholders’.

The 10 core values and key principles outlined in this Charter coupled with the provisions concerning its implementation, describe our values, principles and practices in the field of ethical behaviour and compliance.

Such values and principles are shared with and by our employees, endorsed by our Board of Directors and deeply embedded in our corporate culture.



We propose to our clients' solutions and expertise that fit their needs and openly explain to our sources why and for what purpose we seek to collect information.

Illustration:

In the interviews we conduct so as to collect data which we deem pertinent for our mission, we ensure that our interviewees are informed about the nature of the information we are seeking and its intended use.

We also, at the outset of each interview, confirm the knowledge and legal ability of our interviewee(s) to provide the information we are requesting.



We aim to deliver to our clients the results they can rightfully expect.

Illustration:

When we collect data to support analysis of industry trends and performances, our sources of information are made aware that, so as to allow us to deliver the results to which our clients are entitled, our employees should not be provided with any information (*such as confidential information*) that we cannot subsequently consolidate, use and further communicate in an anonymous manner.



We share values such as trust and loyalty

Illustration :



Yole employees have an exclusive relationship with Yole.

Their employment agreement provides that they cannot work for other employers without specific approval from Yole management.

As part of our commitment to people we take care of personal data of our business partners, customers, contractors and employees. We strive to comply with the European General Data Protection Regulation (GDPR) which became effective in May 2018 and have adopted a specific policy on Data Privacy and Data Protection, which is available on our website.



We are inspired by values such as respect.

We commit to apply the highest standards of professional integrity internally and in our dealings with third parties.

Illustration:

Yole employees undertake to perform their activities with due dignity, and commit, at all times in their professional relationships, to show respect to all persons with whom they engage.



We value transparency and believe in fair dealings.

We will not seek unfair advantage or offer discriminatory conditions to our business partners, team members or employees.

Illustration:

Yole may not always treat everyone identically, but will seek to ensure that no advantage is granted to a client or other stakeholder without a proper and objective justification.



We believe in loyal competition and that our successes can only be achieved using accurate information.

Illustration:

Yole employees are required to check and confirm with their sources, all data and information collected as part of our interview processes.



We reject any form of corruption or bribery as well as any practices which may appear inappropriate or generate impropriety.

Illustration:

We never pay our customers or other stakeholders for the information they provide to us.

KEY PRINCIPLE # 8



We attach great importance to the need to avoid any conflict of interest situations: i.e any situations where circumstances may raise doubts on the ability of an employee of Yole to act with total objectivity with regards to the interests of Yole.

We therefore apply the 3 simple rules to deal with conflict of interests.



Rule 1 :

Business decisions must always be made in the best interests of Yole rather than in view of any personal considerations or relationships.

Rule 2 :

Yole employees may not undertake political or any other activities which do not form part of our scope of business, in a manner which may make it appear that such activities are supported directly or indirectly by Yole.

Rule 3 :

Yole employees may not offer or accept gifts, benefits, reimbursements or entertainment to or from a third party which would constitute a violation of applicable laws or regulations, or that could affect or appear to affect the professional judgement or the performance of their work for Yole.



We attach great importance to the need to avoid any potential Insider Trading risks.

Such risks may arise in our consultancy business because one or more of our employees may be exposed to material non-public information concerning a company whose securities are traded on a public exchange.

We therefore apply the 2 rules to deal with Insider Trading Risk.



Rule 1 :

Yole employees undertake not to use any information received in the context of their work, for personal gain or for the benefit of relatives or associated partners.

This means that Yole employees or contractors undertake not to buy or sell shares or other securities, or to take any personal advantage of information obtained in the frame of their work for Yole and relating to a publicly traded company, including by passing such information on to others, for the purpose of facilitating a public trade in the securities of the company concerned.



Rule 2 :

The data and reports prepared by Yole are subject before their issuance to a final review by Yole CEO inter alia to ensure that they do not include any non-public information specific to a publicly listed company.

If any potential issue arises, Yole will check with the Company concerned by the information, prior to issuing the report or publishing the relevant data.



We protect our assets in accordance with applicable laws and our commitments towards third parties.

Illustration:

We provide periodic training to our employees on our Values and Guiding Principles in the field of Business Conduct and on the need to comply with applicable laws and regulations, as well as with all contractual commitments duly undertaken by Yole.



We protect our IP for the best interests of all our stakeholders

Illustration:

Yole employees are committed to ensure that IP developed using tools or equipment made available by Yole and/or during work performed for the account of Yole, are transferred and assigned to Yole in accordance with applicable contractual arrangements.



We trust in the loyalty, motivation, competence and sense of responsibilities of all our employees.

Illustration:

We invite all our employees to speak up on any issue relating to our Values and Guiding Principles in the field of Business Conduct.



General

Yole promotes a culture of openness where all stakeholders in Yole (including employees, customers and suppliers) may raise concerns and views concerning our Values and Business Conduct Guiding Principles and be assured that such concerns and views will be and fairly considered by Management.



Appointment of Lauranne Varrault as Compliance Officer

In order to drive increased awareness to our values and Business Conduct Guiding Principles, as well as to ensure their deployment throughout the Yole Group of Companies, Lauranne Varrault in addition to her role as HR Director for Yole, has been appointed Compliance Officer for the Yole Group of Companies.

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All employees of Yole are encouraged to contact our Compliance Officer (and/or the CEO if they deem it appropriate or desirable) on any question or concern related to the application of our values and **Business Conduct Guiding Principles**. In the event an employee raises an alert concerning possible unlawful or unethical behaviour, confidentiality will also be ensured in relation to the alert.

An employee that raises an alert shall furthermore not be subject to any penalty or retaliatory measure or discrimination, provided that he/she has acted in good faith and without the intention to cause harm, even if the events relating to the alert prove inaccurate and no action is subsequently taken.

Our Compliance Officer should also be contacted when an employee is required to make any sensitive decisions in the course of their work. Such contact will remain confidential if the employee so requests.

REPORTING & RECOMMANDATIONS

Our Compliance Officer will report to the CEO as and when necessary but at least once a year on the deployment of our **Business Conduct Guiding Principles**, issues raised and addressed by the Compliance Officer.



Our Compliance Officer shall also make, as and when she shall deem appropriate or is requested to do so by a Yole employee, recommendations to the CEO for clarification, improvement or additions to our 12 key principles in the field of Business Conduct.

Our CEO will in turn be responsible for reporting periodically to the Board of Directors of Yole feedback received regarding our 12 key principles in the field of Business Conduct, including any feedback received directly from stakeholders in Yole such as customers, suppliers or shareholders.