

Life Is On

Schneider  
Electric



# Trust Charter

Schneider Electric's  
Code of Conduct

# Trust Charter, Schneider Electric's Code of Conduct

We want trust to power all our interactions with stakeholders and all our relationships with customers, shareholders, employees and the communities we serve, in a meaningful, inclusive and positive way.

Schneider Electric's purpose is to empower all to make the most of our energy and resources, bridging progress and sustainability for all. At Schneider, we call this "Life is On".

We believe that trust is a foundational value. First, trust is earned, both by individuals and by organizations. Second, trust serves as a compass, showing the true north in an ever more complex world. Third, trust is core to our Environment, Sustainability and Governance commitments.

We want trust to power all our interactions with stakeholders and all our relationships with customers, shareholders, employees and the communities we serve, in a meaningful, inclusive and positive way. Hence we created this Trust Charter to act as our Code of Conduct and demonstrate our commitment to ethics, safety, sustainability, quality and cybersecurity, underpinning every aspect of our business and our willingness to behave and respond respectfully and in good faith to all our stakeholders.

It is both our individual and collective responsibility to comply and respect laws and regulations, to apply our Schneider Policies and to uphold strong ethical principles to earn trust at all times.

As trust fuels empowerment, each section of the charter states clear do's and don'ts and provides clear references to relevant policies and procedures (which are adapted to meet local legal requirements when necessary).

Our Code of Conduct applies to everyone working at Schneider or any of our subsidiaries. Hence, we train our employees yearly on the Trust Charter and regularly ask that they confirm their acceptance of its content.

## What you can do if in doubt or need to raise a concern

We are encouraged to use our judgment to determine the best course of action, but there may be times when we face ethical dilemmas or are unsure and need guidance to better understand how to act. In such cases, our network of Ethics Delegates is available for advice and support.

Our alert system  Trust Line allows our employees and our external stakeholders to raise any concerns. When an alert is raised, it is subject to a thorough and confidential investigation, protecting all individuals involved. The findings of such investigations are then submitted to the relevant governing committees, who decide on the appropriate action to be taken. For more details, please refer to our whistleblowing policy.

# Table of Contents

<b>Trusted Teams</b>	<b>4</b>
1. Exemplify Our Leadership Expectations	5
2. Create Equal Opportunities	6
3. Harness the Power of All Generations	7
4. Champion Well-Being and New Ways of Working	8
5. Be S.A.F.E. First	9
<b>Trust with Customers and Partners</b>	<b>10</b>
1. Strive for High Quality	11
2. Strive for Resiliency	12
3. Reach the highest standard for Cybersecurity and Sensitive Data Exposure	13
4. Drive Business with Data Risks Management across the whole Enterprise Data Ecosystem	14
5. Prohibit any Form of Corruption	15
6. Require Third-Party Integrity	16
7. Avoid Conflicts of Interest	17
8. Uphold Fair Competition	18
9. Abide by Export Controls and Sanctions	19
10. Select and Manage Suppliers Responsibly	20
<b>Trust with Investors</b>	<b>21</b>
1. Prevent Insider Trading	22
2. Deliver Accurate Financial Statements, Records and Tax Information	23
3. Deliver Solutions in Compliance with Financial and Risk Management Standards	24
4. Preserve our Information Technology Assets and Corresponding Intellectual Property Assets	25
5. Preserve our Reputation	26
6. Make objective decisions using Available, Reliable, Reusable Data	27
<b>Trust with Communities</b>	<b>28</b>
1. Act for a Climate Positive World	29
2. Be Efficient with Resources	30
3. Uphold Responsible Lobbying and Political Activity	31
4. Empower Local Communities	32
5. Do not use 'Conflict Minerals'	33
6. Act as Good Corporate Citizens	34



TRUSTED TEAMS

# Exemplify Our Leadership Expectations

## 01

TRUSTED TEAMS



Leadership is recognition of experience and expertise, but also a responsibility.

Our leaders set the tone and exemplify our culture. Beyond our core values, leaders throughout our organization must live up to, and actively demonstrate, our leadership expectations. In today's next normal, leaders share a common commitment to drive the company's future, by delivering meaningful business impact, leading inclusively building human connections in a digital world with trust, empowerment, accountability, and care.



- Innovate for the future with visionary, disruptive and digital mindset
- Remove complexity wherever possible and move with simplicity and speed
- Ask for and give coaching and feedback on a regular basis
- Lead with care for well-being and work/life management
- Collaborate across the organization with openness and trust
- Empower the team without micromanaging
- Are decisive and clear even in ambiguous situations



- Sacrifice long-term success for short-term results
- Lack trust in our teams and colleagues
- Create an environment with NO psychological safety
- Overlook compliance on safety, ethics or harassment violations

## Create Equal Opportunities



Our ambition is to be the most inclusive and caring organization in the world. Because a diverse, equitable, inclusive and caring company yields stronger innovation, performance and well-being and because we want to be a reflection of the community where we live and operate.

We aim to offer equal opportunities to everyone so they feel uniquely valued and safe to contribute their best efforts, free from harassment, victimization and discrimination. We hardwire inclusion and care by design in our processes and behaviors to make them more transparent and equitable. We also provide fair access to information and tools that support growth, and hold each other accountable to live by those principles.



- Build and support a culture of respect in our interactions, and speak up when we see discrimination or harassment of any kind
- Foster an open and safe work environment so that everyone can share their perspective and be their true self
- Cultivate diversity in all its forms, starting with diversity of thoughts
- Demonstrate inclusive behavior by identifying and addressing our own biases
- Ensure equal pay for equal work and implement fair and equitable pay practices
- Encourage employees to take ownership of their careers and take advantage of different platforms and programs to grow



- Make assumptions about people or their intentions
- Tolerate degrading comments or discriminative treatment on race, sex, ethnic and national origin, religion, political opinion, age, medical status, marital status, disability, pregnancy, sexual orientation, gender, or gender identity
- Let biases drive decisions
- Accept or allow intimidation, discrimination, or disrespect



# Harness the Power of All Generations

03

TRUSTED TEAMS



We seek to create an open and supportive workplace where all employees are talent and empowered to grow to their fullest potential, developing new skills and building their careers for today and tomorrow.

We want to inspire and attract the next generation of talent by building strong relationships with universities, campuses and underprivileged communities. We also encourage our senior talent to leverage their unique expertise and experience, and to continue having meaningful and fulfilling development in the later stages of their career. By leveraging the power of all generations, we can create a workforce with unrivaled skills and experience.



- Ensure equitable development opportunities for each generation
- Contribute to the employability of our teams by building both depth and breadth of skills & experiences for their current and future roles
- Drive employees' development through career conversations at every stage of their career, and through platforms such as the Open Talent Market
- Facilitate open discussions by dedicating time to late-career conversations
- Encourage knowledge exchange, mutual mentoring and training by tapping into the skills and experiences of everyone to bridge knowledge and skills gaps across all generations
- Commit to investing in and hiring 'next generation' talented recent graduates, interns and apprentices
- Support digital upskilling for all in response to business and market needs



- Withhold (organizational) information that may hinder effective collaboration and business continuity, such as support with succession plans
- Limit career progression or learning opportunities based on assumptions and/or stereotypes



# Champion Well-Being and New Ways of Working



In today's global, digital and ever-changing environment, our ability to cooperate with colleagues, partners and customers in an agile, inclusive, and trusting manner is critical for success.

The emotional, physical, social and mental well-being of our people is important and can be sustained by purposefully building a more resilient organization in which people can set boundaries and perform at their best. As a company, we are embracing new – more digital, agile and smarter – ways of working that drive higher performance, improve well-being and offer a more equitable and inclusive work environment.



- Make time to check-in with care to enhance all dimensions of well-being for everyone
- Implement Flexibility@Work practices to better manage everyone's unique life and work
- Be selective on how time is spent: stop starting and start stopping
- Apply new and smart ways of working to free up time and energy
- Ensure fairness, equity, empathy and care in our decisions and behaviors



- Judge people's flexibility needs, whatever their situation
- Ignore signs of distress, stress or burn-out
- Underestimate the value of rest and recovery
- Forget that well-being and new ways of working is everyone's business



## Be S.A.F.E First



We all have a role to play, therefore we are all empowered to look after our own safety and the safety of others.

Safety is a value of our brand, at core of the organization, that we never compromised. Our 'S.A.F.E. First' principle reminds us to pause and assess our own safety before beginning any task (Self, Activity, Facility, and Environmental checks). We strive to work safely at all levels of the organization, at anytime, anywhere.

- ✓ • Look out for the safety and health of our colleagues, contractors, and customers. Truly caring for each other
  - ✓ • Only carry out tasks that we are qualified to perform
  - ✓ • Identify, assess, and systematically control risks (i.e., hazardous energies, chemical substances, moving parts in a machine, etc.)
  - ✓ • Follow the Safety Golden Rules for the Top 5 Hazards: machine, electrical, road, powered industrial trucks and falls
  - ✓ • Stop work when risks are not controlled or when a situation becomes unsafe to be performed
  - ✓ • Report all opportunities and events to continuously improve our health and safety systems, and share solutions so others can learn
- 
- ✗ • Blame people for safety issues, or if someone speaks up
  - ✗ • Interfere with or bypass safety control measures
  - ✗ • Do business without a clear vision of safety hazards and controls
  - ✗ • Become complacent about unsafe decisions and situations



TRUST WITH CUSTOMERS AND PARTNERS



# Strive for High Quality

01

TRUST WITH CUSTOMERS AND PARTNERS



Because the quality of our products is the safety of our customers and field teams, one of our top priorities is to ensure the highest level of quality of our products and services, to delight our customers and protect them and their assets. Continuously improving quality is central to our organization's strategy, and foundational to achieve our overall business purpose and mission. Recognizing the need and the opportunity that delivering superior quality would bring, the Group began a company-wide transformation to accelerate our quality journey.

While continuing the current Customer Satisfaction direction, we are aiming to instill a Culture of Quality for all employees.



- Move from correction to prevention, rigorously applying quality fundamentals and leveraging data and analytics for more driven metrics and actions
- Engage all stakeholders to instill a quality culture and speak up when suspecting any issue
- Implement governance, to ensure full transparency and fast reaction to potential and actual defects, especially those related to potential safety and or regulatory failure modes
- Drive quality and customer satisfaction systemic improvements and performance visibility across the value chain.



- Lay blame when an employee speaks up about customer issues
- Hide nonconformities

# Strive for Resiliency

02



TRUST WITH CUSTOMERS AND PARTNERS

Resiliency is the capacity to quickly recover from difficulty. We use a risk centric framework to reduce our exposure to technological, environmental, process, geo-political, and health risks that disrupt our business.

We have standardized issue-escalation processes in place, as well as risk assessment and business impact analysis. We are prepared to manage any crisis with disaster recovery and business continuity plans, if needed. Our local leaders are empowered to assess risks, increase their preparedness and handle all types of crises with a rapid and effective response, thanks to processes and tools in place to support them.



- Respond to emergencies by focusing on protecting lives, minimizing damage to assets and any impact on both the immediate area and the wider environment
- Focus on keeping and/or getting our critical operations running in times of crisis, with tools, processes, roles and responsibilities for immediate and effective response
- Strive to continuously improve our response and recovery management, learning from simulations and real events
- Anticipate mid to long-term risks related to climate change and biodiversity loss, deploy adaptation plans and embed in investment decisions
- Anticipate and mitigate business dependencies to resource (energy, water, materials) scarcity



- Assume that resiliency planning is somebody else's responsibility

# Reach the Highest Standard for Cybersecurity and Sensitive Data Exposure

TRUST WITH CUSTOMERS AND PARTNERS

03



Cybersecurity is an essential business imperative for us, our ecosystem and the industry at large.

Our strategy encompasses people, processes, and technology across the operational lifecycle. We align with the Cybersecurity Framework of National Institute of Standards and Technology (NIST), follow globally recognized standards<sup>1</sup> and comply with certified 'secure by design' product and system development process to safeguard our digital ecosystem and deliver secure offers, systems, solutions and services.



- Comply with international regulations and coordinate with law enforcement, when required
- Assess, monitor and continuously seek to improve our cybersecurity posture and that of our extended ecosystem
- Help our customers to improve their cybersecurity posture providing timely vulnerability and security notifications as well as satisfying their cybersecurity, data security and product security related requests
- Hold our suppliers to high standards in terms of cyber and data security by applying risk-based and scalable frameworks
- Promote cybersecurity through trusted and transparent information sharing; provide support into collective play of combatting cyber threats and attacks
- Collaborate with authorities and cross-industry organizations to further secure value chain and strengthen digital trust
- Provide clear communication and public statements on Schneider Electric and its extended ecosystem's cybersecurity posture, if required
- Promote a culture where cybersecurity is everyone's responsibility and encourage a transparency mindset regarding potential cyber risks reporting



- Consider that cyber risks are purely technical issues or separate them from other enterprise risks
- Assume that our suppliers, our partners, or external organizations, will manage cyber risks for us

<sup>1</sup> Such as ISA/IEC 62443, ISO 2700x

<sup>2</sup> Founding member of the [ISA Global Cybersecurity Alliance](#) and a member of the [Cybersecurity Coalition](#) and the [Cybersecurity Tech Accord](#).

# Drive Business with Data Risks Management across the whole Enterprise Data Ecosystem



04

At Schneider Electric, we aim to deliver best in class experiences, products and offers with the support of our ecosystem of trusted partners.

Data is the lifeblood of our Digital Ecosystems, allowing win/win value creation when exchanged in a governed and secured manner. To do so, we commit to create, ingest and consume data applying a holistic Data Risks Management framework, anticipating and answering regulations and potential exposures. We are conscious of the risks associated to data sharing, specifically on privacy, retention and protection of personal information, sensitive and strategic data.

Data intensive technologies such as Artificial Intelligence (AI) and data sciences will bring substantial benefit to our industry and will nurture our Digital Ecosystem and require even more attention to Data Risk Management.

We thus implement Data Management Risk Framework as part of our Enterprise Risk Management framework and are committed to assure that all data in Schneider's ecosystem is created, processed and consumed responsibly, securely, fairly and transparently, in compliance with applicable Regulations.



- Adopt a Data Risk Management Framework (covering privacy, retention, protection, access management, etc...)
- Deploy Data Assurance by design
- Run compliance controls and implement corrective programs as needed
- Hold suppliers and partners to high Data Risk Management standards
- Develop algorithmic transparency of our artificial intelligence systems and other automated decision-supporting digital technologies, without impairing the confidentiality of data and the protection of intellectual property
- Address potential AI algorithms biases, aiming for equal treatment and respecting individuals' legal rights
- Upskill data competencies, leveraging the Data and AI Academy



- Handle data without a clear understanding of its sensitivity and without applying relevant data protection mechanisms
- Allow unauthorized access, unrestricted sharing, unlawful or unsecured use of personal information
- Violate human rights and civil liberties by misusing our knowledge
- Develop algorithms that could impact individuals without consideration for ethics and privacy, or implement or use AI systems leading to biased decision-making
- Develop, source or implement AI systems without checking their compliance with applicable AI regulations,
- Think data is a topic for experts: data protection is everyone's business

# Prohibit any Form of Corruption

05

TRUST WITH CUSTOMERS AND PARTNERS



We uphold a zero-tolerance policy for corruption and bribery, in compliance with all laws, such as but not limited to the French Sapin 2 Law, the US Foreign Corrupt Practices Act and the UK Anti-Bribery Act.

Clear boundaries and efficient processes ensure that risks are managed effectively and that all employees are empowered to act to avoid any form of corruption. Any compromise on such principles can be harmful to employees, to Schneider and the communities it serves.



- Highlight our zero-tolerance for corruption and money laundering, internally and when dealing with third parties
- Ensure that all given or received gifts, invitations, donations, hospitality packages and sponsoring activities are lawful, transparent, appropriate, approved as per our policies, and properly documented in our records
- Immediately inform our manager when aware of any action contrary to policies
- Organize our marketing events and manage customer invitations in line with our policies, with a clear business purpose
- Apply our commercial policy with acceptable and transparent discounts and bonuses, justified by the value provided, and always in compliance with legal requirements and our policies
- Follow all accounting, record keeping and financial reporting requirements applicable to payments, particularly in compliance with legal and/or regulatory anti-corruption provisions



- Give or accept bribes, whatever their form, monetary or in-kind, such as monetary gifts or payment of travel
- Facilitate payments to secure or speed up routine legal or government-related actions, such as issuing permits or releasing goods held in customs
- Grant unlawful benefits to any third party to speed up a process or gain favor
- Invite public officials without approval, as per our policies and procedures
- Engage in or cover up corrupt practices or suspicious/illegal financial transactions, including those potentially perceived as money laundering
- Approve any payment without relevant authorization according to our Chart of Approval and without checking the recipient
- Accept any undue solicitation from third-parties
- Agree to a sponsorship commitment as a condition of a commercial process or a business engagement
- Make a sponsorship commitment or agreement until the commercial scope and value of the sponsorship are agreed



# Require Third-Party Integrity

# 06

TRUST WITH CUSTOMERS AND PARTNERS



Our relationships with third parties, such as customers, business partners, distributors, suppliers, subcontractors, or business agents are built on integrity and trust.

We expect third parties to manage ethics and compliance risks according to their level of exposure, abiding with anti-corruption and export control laws and regulations, and in respect of international human and labor rights, such as eliminating forced labor, child labor and discrimination. We ensure that our business is not used to launder money from criminal activities.



- Only approve third parties following internal ethics and compliance due diligence according to our Chart of Approval and the appropriate monitoring of the related risks through training, audits or certification
- Ensure third-party contractual provisions are adapted to any identified risks
- Enforce our Supplier's Code of Conduct
- Ensure third-parties' scope of work is contractually defined, their performance effective, and payment proportionate to industry and local standards
- Ensure that payment requests to third parties, especially business agents, are accurate and auditable, and have been approved according to our Chart of Approval
- Ensure that our activities are not used for money laundering
- Closely monitor our third-party relationships and business requirements, with specific metrics
- Extend our environment ambitions to third-parties, to deliver on climate and resources commitments



- Enter into a third-party relationship without defining the scope of work
- Allow third parties to give bribes or make questionable payments on our behalf
- Use or pay business agents unless approved as per the Business Agents policy
- Approve the payment to a third-party without following the contractual payment terms, an invoice or prior approval



# Avoid Conflicts of Interests



A Conflict of Interest situation occurs when an employee's personal interest potentially competes with – or is in opposition to – the interests of Schneider.

Situations of conflict of interest can unconsciously influence a person's judgment and challenge their integrity. We recognize and respect that employees may take part in legitimate financial, business and other activities beyond their jobs at Schneider. However, these activities cannot conflict with their responsibilities to Schneider.



- Disclose potential, apparent or actual conflicts of interest and comply with related mitigation actions
- Disclose involvement with, or financial stakes in any organization related to our competitors, customers or suppliers, and explain how this allows us to influence decisions in its favor
- Participate to the yearly Conflict of Interest Disclosure Campaign when requested so
- Consult with our Ethics Delegates or HR Business Partners in case of doubt



- Hide information on any conflict of interests
- Debate or participate in internal decision-making processes, should a conflict of interest arise
- Allow decisions or actions to be influenced by favoritism, nepotism or preferential treatment
- Help or work for our competitors
- Engage in or have direct or indirect interests in any other activity, business or employment that interferes in any way with our responsibilities and availability to Schneider

# Uphold Fair Competition



TRUST WITH CUSTOMERS AND PARTNERS

08

When companies compete in an equal and fair manner, trust is guaranteed.

This ensures more innovation in markets, enabling companies to meet consumers' needs with better prices and to drive sustainable growth. As an ethical company, we refrain from any conduct which violates, or can be perceived as violating, competition laws or regulations.



- Comply with the law and with our Global Competition Law Policy and Guidelines
- Set our commercial strategies, prices and discounts independently from competitors, other manufacturers, distributors, partners and resellers
- Act fairly with our distributors, partners and resellers
- Ensure that any information exchanged with our distributors, partners, resellers and the market is done in compliance with the law and our policies
- Act promptly when you receive confidential information from or about our competitors in breach of the law or our policies to report it to our legal team, cease contact and not share it pending their guidance
- Seek guidance from our legal team if you wish to place price, territorial or online sales restrictions on our suppliers, distributors, partners or resellers or to act in any way that restricts competition or if you have any competition law concerns



- Share any confidential information with competitors or consult and agree (directly or indirectly) with competitors regarding prices or margins, strategies, market share, production volumes, product developments, dealings (or refusal to deal) with customers or suppliers
- Split up and share customers, bids, business opportunities, territories or markets with competitors
- Impose on distributors, partners or resellers a fixed or minimum resale price or margin or a maximum discount/rebate
- Communicate anything that is or could be perceived as anti-competitive or use language that is intended to mislead in that respect
- Ask current or former staff to share confidential information about other employers
- Encourage customers or suppliers to breach contracts



# Abide by Export Controls and Sanctions



09

Export Control involves the transfer of goods, services and technology within a country, between countries or nationals.

As a global business, with operations and business activities conducted across many countries, it is important to comply with applicable export control laws and sanction regulations, as well as enhancing supply chain security.



- Conduct business in compliance with applicable export control and sanction laws and regulations
- Adhere to reporting and recordkeeping, as per regulations
- Contribute and comply to Schneider Electric export control program and its requirements



- Evade any applicable laws and regulations relating to Export controls and sanctions, including licensing requirements
- Conduct business activities before undertaking due diligence and clearance procedures
- Get involved in projects with domestic or cross-border transactions which may expose Schneider to infringing export control regulations

# Select and Manage Suppliers Responsibly



We value our relationships with suppliers, beyond the purchase and delivery of goods and services. We deal with them in a mutually supportive and open, fair, objective way.

To achieve our vision for sustainable procurement, we require our suppliers' full support and collaboration. We conduct our business together ethically, focusing on human rights and social impact at all levels and the preservation of ecosystems and resources with circular economies for an inclusive and carbon-neutral world.

We expect our suppliers to commit to and implement business practices with full respect to the environment, human rights, health, safety, decent work conditions, and fair business standards.



- Extend our values and commitments to the whole value chain and not only to our employees
- Require future and existing suppliers to comply with Schneider's Suppliers Code of Conduct
- Award suppliers fairly based on open, competitive bidding and without favoritism
- Support suppliers in understanding our terms and conditions and in meeting our expectations, in line with industry standards
- Expect our buyers, and other Schneider stakeholders in contact with our suppliers, to apply fair and ethical business practices
- Build a resilient supply chain, through collaboration and anticipation



- Impose abusive conditions on suppliers, such as unattainable deadlines or unfair payment conditions, etc
- Select or award suppliers who do not meet our values and expectations



TRUST WITH INVESTORS

# Prevent Insider Trading

01

TRUST WITH INVESTORS



Insider trading occurs when a person trades in a company's securities when in possession of material nonpublic or price-sensitive information about that company.

As employees, we must be mindful of our responsibility to respect insider dealing laws and regulations as we may have access to inside information about Schneider Electric and its listed subsidiary companies.

Employees are not restricted from making personal investments, but it is prohibited to trade in any Schneider or listed subsidiary companies' shares while aware of nonpublic information that can significantly affect the market value of these shares.

Examples of insider trading include buying or selling shares before announcing financial results, acquisitions, divestments, winning or losing major contracts, or ongoing litigation, etc. which may cause the company's share price to rise or fall.



- Only disclose inside information, on a strictly need-to-know basis and with the authorization of the Board of Directors' Secretary
- Avoid chain mails and conversations in public spaces
- Consult the Board of Directors' Secretary, if in doubt, before buying or selling Schneider shares or its listed subsidiary companies' shares



- Buy or sell shares in Schneider or its listed subsidiary companies if we have inside information at that time
- Disclose inside information to anyone, inside or outside the company, without the Board of Directors' Secretary authorization

# Deliver Accurate Financial Statements, Records and Tax Information



02

TRUST WITH INVESTORS

All our financial records must be accurate, properly maintained and transparent to accurately present Schneider's performance in accordance with International Financial Reporting Standards (IFRS) and to regularly provide transparent and trustworthy information to shareholders.



- Enforce internal controls and processes to ensure that our financial and business records, including financial and nonfinancial reporting, are always accurate
- Continuously review and improve our processes to attain the best standards in the market
- Follow all recordkeeping guidelines to maintain records securely
- Cooperate with our internal and external auditors
- Strictly follow tax regulations everywhere Schneider operates, always acting in good faith



- Make any exceptions to our financial processes
- Sell, transfer or dispose any of Schneider's assets without proper authorization and documentation
- Accept cash transactions unless no alternative is possible and only then subject to the authorized legal amount, expressly authorized and properly recorded
- Conceal payments via third parties
- Knowingly evade tax obligations

# Deliver Solutions in Compliance with Financial and Risk Management Standards



TRUST WITH INVESTORS

03

Our solutions are designed, manufactured, and delivered to meet customer specifications, ranging from simple engineered-to-order solutions to complex integrated solutions.

From the earliest stage of each project, we involve experts to identify and manage potential risks related to financial, legal and implementation matters. We comply with contractual terms and financial reporting standards to protect our assets.



- Consult legal expertise to check liability exposure before approving contracts
- Allocate people to each project with appropriate skills and competencies
- Implement a sequential business opportunities review and approval methodology, in compliance with our Charts of Authority
- Run comprehensive expert assessments so approvers make informed decisions by evaluating risks, benefits and propose mitigating actions
- Identify project performance obligations per the Recognize Revenue policy, in accordance with International Financial Reporting Standards (IFRS)
- Conduct regular project reviews to update forecasts, control risks, identify opportunities, and monitor customer satisfaction
- Secure cash and margins for projects in compliance with all applicable laws, regulations and standards through accurate and timely reporting
- Identify and assess, at the earliest stage of our projects, potential Environment, Human Rights and Business Conduct risks to ensure we respect laws and regulations as well as our company commitments



- Get involved in bids and contracts without expert analysis and approvals per our Chart of Approval
- Get involved in the integration of legal entities or other arrangements which intend to share profits and/or losses and liabilities without Group CFO approval
- Provide parent company guarantees without Group CFO approval
- Raise customer expectations that don't coincide with our Chart of Authority's approved mandate
- Knowingly misrepresent a projects' financial performance

# Preserve our Information Technology Assets and Corresponding Intellectual Property Assets



Our IT (Information Technology) and IP (Intellectual Property) assets enable us to efficiently achieve our business and sustainability goals and become a more digital organization.

It is our collective responsibility to source, implement, manage, and retire our IT and IP assets correctly. Moreover, it is essential to reduce any existing and new risks that may arise from how we use these assets.



- Apply Schneider Electric IT Asset Management Policy to properly handle company Information Technology Assets
- Apply security guidelines to protect Schneider when handling the company's assets and data
- Give the same level of care to those company assets we use as we would to our own assets
- Apply sustainable thinking when working with or returning our company assets
- Apply our Source Code Governance policy when creating software IP



- Use company assets for non-Schneider / personal businesses or in ways that interfere with our professional responsibilities
- Use third party assets, such as software, intellectual properties, photos or videos, etc., without ensuring that we have the right and licenses to use them
- Acquire, sell, transfer, or dispose of any IT or IP assets without following Schneider's process
- Engage directly with supplier or vendor without support from appropriate Schneider's function

# Preserve our Reputation



TRUST WITH INVESTORS

05

We are all custodians of our brand and its reputation. As company representatives, we embody the Schneider Electric brand in the eyes of investors, employees, customers, community and all stakeholders. Therefore, we must choose our words wisely and act responsibly in both formal and informal meetings and discussions.

Information is valuable, and the unauthorized disclosure of internal information can be detrimental to the Schneider brand image. As well, we make our best effort to honor the commitments we take in financial and extra-financial matters and we communicate on a regular basis and transparently on the achievement of these commitments. We are committed to an energy transition journey that harnesses the power of partnership in supporting the different stages of our customers' sustainability journey. In line with our Sustainability Commitments, we use good judgment in our co-marketing activities, supporting our position and reputation as an Impact Company.



- Demonstrate ethical and professional behavior externally and protect Schneider's reputation, use official communication materials and follow brand guidelines
- Act with caution when posting on social media
- Avoid discussing confidential topics externally, in public places
- Respect confidential information by signing Non-Disclosure Agreements (NDA)
- Take the right care in elaborating our commitments for future financial and extra-financial performance, and make our best effort to deliver
- Adopt robust marketing practices related to sustainability, based on science and standards



- Interact with the press or speak publicly without prior approval
- Share any confidential or proprietary company information related to R&D, pre-launches, mergers, acquisitions, disposals, financial performance, intellectual property, internal documents or customer and employee information, etc
- Comment on financial performance or announcements
- Get involved in activities that could reflect negatively on Schneider
- Involve Schneider in personal convictions and beliefs
- Express personal opinions about Schneider through official communication channels, such as social media
- Disparage Schneider or colleagues on online forums

# Make objective decisions using Available, Reliable, Reusable Data

06

TRUST WITH INVESTORS



At Schneider Electric, we believe in a data backed execution of our Strategy, not in Data for Data.

Everything starts with understanding for which purpose and for which decisions data is needed. It is everyone's business at Schneider to create, process and consume data.

We believe that good data governance practices are an accelerator of scalability and an enabler of trust. Also, by implementing standards, controls and best practices of data governance we enable a performing data supply chain, fostering data reliability, integrity and velocity.

Our Data Charter sets out the principles and foundation of data governance, which can be summarized in 4 Data Golden Rules:

- Golden rule #0 – Data Risk Management
- Golden rule #1 – Governed Authoritative sources
- Golden rule #2 – Governed Group Referentials
- Golden rule #3 – Governed Group Data Platforms

Schneider Electric must adequately comply with those data golden rules from data creation to data consumption.



- Apply the 4 Data Golden Rules to drive trust and scalability
  - Apply the Data Risk Management framework
  - Use authoritative data sources
  - Categorize data using Company Referentials
  - Distribute data to governed SE data platforms only
- Ensure that Performance Dashboards are relying upon objective and unbiased datasets
- Implement the appropriate governance by establishing or leveraging the relevant data offices in accordance with the Data Franchise Model



- Use data for key decisions without complying with the 4 Data Golden Rules
- Create an alternative dataset when a Reusable Data Objects is already available
- Use unsanctioned data source when an Authoritative Source is already available
- Jeopardize accuracy and integrity of data by not maintaining data traceability
- Worry about data too late, typically once a system is already deployed



TRUST WITH COMMUNITIES

# Act for a Climate Positive World



TRUST WITH COMMUNITIES

01

We take our climate pledge very seriously, and we help our customers drive their business growth while reducing their carbon emissions. We share our carbon-neutrality responsibility and ambitions with our employees, customers and other stakeholders.



- Increase our customers' energy efficiency, enable the growth of renewable energy and reduce CO<sub>2</sub> emissions
- Consider climate impact as part of our corporate and industrial strategy
- Advise customers on improving their energy management and reducing their carbon footprint
- Act with suppliers to reduce emissions throughout our supply chain, from production to transport to waste management
- Disclose detailed information on the environmental life cycle footprint of our products
- Reduce the CO<sub>2</sub> emissions in our sites and facilities with our technologies and by using renewable energy sources
- Encourage our employees, partners and customers to reduce their carbon footprint



- Consider the environment secondary to our business priorities
- Merely comply with laws and regulations; on the contrary we strive to set and achieve ever more ambitious goals



In respect of our planet, its nature and biodiversity, we have pledged to continuously minimize our environmental impact and take care to use fewer resources and more green materials in our products. We have developed circular-use systems to incorporate reuse, repair and recycling, and welcome innovative service models which extend the life of our products.



- Innovate with circular offers enabling increased life cycle services and efficient maintenance
- Include recycled materials in our products without compromising on safety and quality
- Reduce waste intensity
- Comply with high environmental standards and regulations
- Disclose environmental information about our products
- Prevent and limit pollution and emissions
- Report environmental abuses for investigation and remediation
- Save water and implement responsible sewage management
- Endorse initiatives to protect nature and wildlife
- Maintain robust management systems to protect people and nature



- Practice the planned obsolescence of our products
- Seek exemption from substance regulations
- Intentionally disregard our indirect impact on biodiversity



# Uphold Responsible Lobbying and Political Activity



TRUST WITH COMMUNITIES

03

As a global company, we play a role in the public debate, clearly stating our position on issues, defending our interests and participating in technical discussions.

As such, we must act with integrity in all public decision-making processes and interactions with public officials when lobbying. We communicate publicly and transparently on our position shared through official meetings or position papers with public decision-makers.

- Take part in lobbying and representation activities only when authorized
- Report our lobbying activities where requested
- Strictly adhere to laws governing lobbying and interaction with public officials, and expect the same from third-parties who act on our behalf

- Participate in activities that could be considered as taking a partisan position on behalf of Schneider
- Make contributions (either monetary or in-kind) to political bodies directly or through third parties on behalf of Schneider
- Get involved in political activity or representation on behalf of Schneider
- Interact with public officials or participate in activities that could be considered as taking a partisan position or which may compromise Schneider's reputation

# Empower Local Communities



Our global presence allows us to help less-privileged communities through specific initiatives, such as the Schneider Electric Foundation focused on youth and education, Access to Energy program or other local and employee-led programs. Through charitable contributions and donations, by teaching, and volunteering our personal time, we support and stimulate communities, providing training to empower grassroots development and investment.



- Support communities with reliable, long-term commitments
- Maintain flexible work policies that encourage employees to devote work time to volunteering
- Provide opportunities to devote time to volunteering, community service and social causes



- Force any employees or third-parties to participate in, or donate to good causes
- Get involved in initiatives that are not in line with our ethical principles or community work

# Do not use 'Conflict Minerals'



TRUST WITH COMMUNITIES

05

We do not use any products or raw materials which either directly or indirectly finance armed groups involved in the mining and trading of 'conflict materials' and associated human rights abuses. In line with this commitment, we ensure our products and the substances used in our products are compliant with applicable laws, throughout our supply chain.



- Source minerals and metals from trusted and socially and environmentally responsible suppliers
- Influence suppliers towards more responsible sourcing with a Conflict Minerals Compliance program
- Adhere to internationally recognized standards for Conflict Minerals



- Work with suppliers who source from or are related to organizations violating human rights

# Act as Good Corporate Citizens

## a) Protect the Vulnerable from Abusive Working Conditions



06a

We believe in dignity, respect, fairness and protecting the most vulnerable from abusive working conditions, including child, forced or other improper labor. We monitor and evaluate our supply chain to ensure that everyone involved has safe working conditions, decent working hours and can earn a minimum living wage. We expect our suppliers, subsidiaries and customers to act similarly for the respect of all Human Rights.



- Operate a value chain free from labor abuses of any kind
- Treat our suppliers and subsidiaries' workers as we treat our own employees
- Conduct due diligence with suppliers, contractors and other stakeholders
- Continuously improve our entire supply chain through dialogue, information sharing and training
- Work with NGOs, business associations and other companies to collectively improve working conditions



- Tolerate human rights infringements
- Delay in responding to any potential labor abuse or violations

## b) Respect the rights of Association, Representation and Social Dialogue



We uphold our employees' right to set up associations and recognize their right to collective bargaining. In accordance with local regulations, our employees are free to join, take part in or leave labor organizations that maintain and defend their interests. We follow all the requirements to build and sustain fruitful and mutually beneficial relationships between labor organizations and management.



- Respect the right of workers to set up and join representation groups and unions
- Foster and encourage constructive dialogue
- Provide workers with the means to run these activities



- Implement internal measures which limit employee access to labor organizations
- Interfere with the work of employee representative groups and unions
- Discriminate or intimidate employee representative bodies or their members

Life Is On



[Learn more](#)

Current publication: March 1, 2023

Schneider Electric SE  
35, rue Joseph Monier - CS 30323  
F92506 Rueil-Malmaison Cedex