



# **CIEL & TERRE**

## **CODE OF ETHICS**

EDITION: 2025



# CONTENTS

 **WHO WE ARE**

 **OUR CORPORATE VALUES**

 **ETHICS CODE OF CONDUCT**

# WHO WE ARE



**Alexis Gaveau**  
CEO Ciel & Terre  
International

## Introducing Ciel & Terre International Group

Facilitating the production of renewable energy was the driving force behind the creation of Ciel & Terre. First specializing in the integration of rooftop and ground-mounted photovoltaic systems in 2006, we then took the path of innovation. Our R&D team developed the patented **HYDRELIO® technology**, pioneering a floating system of solar power plants to be installed on water, on different types of reservoirs.

Since 2011, Ciel & Terre has been distributing its solution and expertise in the engineering and design of floating photovoltaic power plants for the commercial, industrial and local authority markets. The company has grown thanks to its innovative potential and international

strategic partnerships, based on trust, transparency and a mutual willingness to share best practices, knowledge and experience.

**Thanks to our unique experience, our teams have in-depth knowledge of the challenges posed by floating photovoltaics.**

We are well aware of the need to support key players throughout the process of setting up a floating photovoltaic power plant. Likewise, we are driven by the ambition to constantly promote and accelerate the growth of renewable energies. This is why we offer a full floating scope : **from project engineering to maintenance of the FPV plant.**

**16**

Years  
Experience

**8**

Local  
Offices

**200**

people  
worldwide

*We deploy renewable energy projects while preserving land. This is our purpose.*

**300**  
projects

**+1GWp**  
installed

**+2GW**  
pipeline

# OUR CORPORATE VALUES



Those Corporate Values are at the core of our work in the renewable energy sector and **govern our conduct.**



## AUTHENTIC

**We are excited and inspired by this collective human adventure.**

*Constructiveness and integrity drive us daily in our relationships with all our partners and clients.*

## RESPONSIBLE

**We extend constantly our knowledge, and we make choices guided by sustainability.**

*We are deeply concerned by the reliability of the solutions we design and implement. Meanwhile, we learn from our own experience and that of our partners.*



## ATTENTIVE

**We are convinced that trusting relationships are key to succeed.**

*Together and with our partners and clients, we create a dynamic and positive synergy around the world to deploy renewable energies.*

## ENTERPRISING

**We continue to nurture our pioneering spirit, with unfailing passion and commitment.**

*We have the courage to face the challenges ahead, are never afraid to be trailblazers.*





# CIEL & TERRE INTERNATIONAL CODE OF ETHICS

This Code of Ethics applies to all **CTI Group employees** (permanent or temporary), as well as **executives, managers and directors** of Group companies. It also applies to our relations with **third parties**: suppliers, service providers, subcontractors, commercial, operational and financial partners, public communities (national, regional, local), NGOs, ..

In particular, each entity within CTI Group requires its contractors and suppliers (the **"Supplier"**) to comply with the principles defined in the **Supplier Code of Conduct**, and the Supplier shall make its best efforts to implement such principles throughout its supply chain and/or during the execution of its services.

This *CTI Group Code of Ethics* and the *Supplier Code of Conduct* are not intended to replace the laws and regulations of the countries in which CTI Group and Supplier operate.

# COMPLIANCE & ANTI-CORRUPTION

At CTI Group, we comply with applicable laws and internal rules.

We combat all forms of corruption, bribery and influence peddling. We do not accept unauthorized advantages from business partners, we do not enter into any agreements or participate in any business practices that are illegal, and we comply with the local regulations and laws in countries where CTI Group is present.

We are a responsible group and as such, we refuse active corruption (offering an undue advantage), passive bribery (accepting an undue advantage) and bribes (giving or receiving presents or favors in exchange for an unjustified advantage).

It is therefore **strictly forbidden** for any employee to offer, promise, solicit or accept, directly or indirectly, any undue advantage, including cash payments, gifts, trips, invitations, or any other favor likely to influence a professional decision, with a **value of more than 200 €**. Gifts or invitations of symbolic value (goodies, end-of-year gifts) or of a value of less than 200 € (business meals or trips of reasonable cost) and with no intention of influencing a decision may be accepted.

Our relations with local and public authorities, commercial or financial partners must be transparent. We do not tolerate favoritism and nepotism (favoring close relations over objective criteria) nor conflicts of interest (giving priority to a personal interest to the detriment of the organization).

Any suspicious agreement, questionable arrangement, non-compliant transaction or proposal of undue advantage or favor exceeding acceptable limits **must be reported to the HR department and management team**.

CTI Group respect local laws which aim is to avoid and combat money laundering, and we do not involve ourselves in money laundering activities.

In the course of our international activities and the development of new markets, we adhere to regulations arising from the international trade and customs laws that are applicable to us, and we commit to fair competition by prohibited any exchange of market-relevant information with competitors. CTI Group complies with applicable tax laws regulations and reporting obligations, at national and international level.

# HUMAN RIGHTS



At CTI Group, we embrace diversity and inclusion, valuing the perspectives and experiences of colleagues from different backgrounds.

We believe that professional relationships must be governed by mutual respect, regardless of hierarchical position.

We promote a respectful, safe, and tolerant environment workplace, where all colleagues can feel accepted and have the opportunity to fully develop their professional potential.

Any form of exclusion or discrimination shall be prohibited, in particular the ones based on age, sex, ethnicity, social or cultural origin, religion, political opinion or union activity, sexual orientation, gender identity, pregnancy, state of health, physical characteristics or disabilities. In this respect, all employees shall refrain from any form of discrimination, violence and harassment.

Moral harassment, sexual harassment and sexist behavior, bullying and any other kind of violence, are unacceptable within our Group.

We encourage employee to speak up and report to their **HR department** of any incidents, misconducts or breaches of the law. In the absence of a local HR manager, the HR department in C&T French headquarters is at the disposal of all employees.

# SUSTAINABILITY & ENVIRONMENT PROTECTION

The core of CTI Group is to act for the energy transition, while ensuring that water resources are used consciously and in a sustainable way. As a company specialized in renewable energy, we have at heart to be responsible toward the people and the environment, to promote a different way of consuming and to act as a player in the energy transition and sobriety.

We work to minimize the potential harmful effects of our activities, processes and products on the environment and climate. In this respect, we support our business partners, suppliers and clients in contributing to these goals, but we also expect our employees to adopt eco-friendly practices to reduce their environmental footprint:

- **Sort waste properly** according to the guidelines applicable in their office and promote recycling when possible.
- **Adopt simple gestures** such as turning off unused lights and equipment, limiting their water consumption, and using energy-efficient appliances.
- **Demonstrate responsibility in their use of resources** by limiting printing and paper consumption, opting for digital solutions when feasible, and adopting good practices to limit their digital pollution.
- If possible, **opt for carpooling, public transport, cycling,** or any other environmentally friendly mobility solutions.
- **Buy responsibly,** giving preference to suppliers committed to sustainable practices and choosing durable, eco-friendly products.

CTI Group acts and encourages research and innovation to develop know-how in the fields of quality and safety, materials recovery and recycling, saving natural resources, protecting biodiversity and reducing pollution.





## Implementation of the CTI Group Code of Ethics

CTI and its affiliated companies contribute to the implementation and further development of this Code of Ethics, which is unlikely to provide satisfactory answers to all specific questions.

## Who to contact if you have any questions about CTI Group Code of Ethics

The management board, as well as all managers of CTI Group, are the first point of contact for all employees if they have any questions about the Code of Ethics.

Should employees need guidance in the course of their day-to-day work regarding the rules and principles set in this Code of Ethics, they can contact Legal, HR or their manager.

Finally, we encourage employee to speak up and report any incidents: a notification channel is available to our employees and business partners to inform us of misconducts or breaches of the law.

## Sanctions

Our zero-tolerance principle requires that any violation of our Code of Ethics results in sanctions. These sanctions will be applied by the manager of the concerned employee's entity. Any act of corruption will result in dismissal.

# GLOSSARY

As CTI Group operates in several countries with sometimes different laws and cultures, it may be challenging to establish common definitions. We therefore propose few definitions which are intended as a guide only.

## **CORRUPTION**

Corruption and bribery refer to the behavior by which offers, promises, gifts or presents are solicited, accepted or received for the purpose of performing or refraining from an act, obtaining favors or particular advantages. Bribery can be active or passive, those are two complementary but independent offences.

## **DISCRIMINATION**

it aims to place one or several persons at a disadvantage for reasons prohibited by law, on the basis of their age, sex, ethnicity, social or cultural origin, religion, political opinion or union activity, sexual orientation, gender identity, pregnancy, state of health, physical characteristics or disabilities. Discrimination on any of these grounds is punishable under criminal law.

## **FRAUD**

any deliberate and concealed action or omission, committed with the intention of deceiving or circumventing the laws in force or company rules, with the aim of obtaining an undue material or moral advantage for the fraudster or for a third party. Fraud can take many forms, punishable by law: theft of money, goods, data, deliberate alteration, concealment or destruction of documents, false entries or declarations, manipulation of accounts, counterfeiting, money laundering, swindling, corruption, etc.

## **MORAL HARASSMENT**

harassment of another person by repeated comments or behavior with the purpose or effect of degrading working conditions likely to infringe their rights and dignity, alter their physical or mental health or compromise their professional future.

## **SEXUAL HARASSMENT**

the repeated use of sexual or sexist language or behavior that violates a person's dignity by being degrading or humiliating. It can take place on or off work. This is a criminal offence.

## CONTACT US

**Ciel & Terre International:**

100 rue Harrisson, 59262,  
Sainghin-en-Mélantois, FRANCE

+33(0)3.20.01.05.65

Visit our website :



Follow us on :

