

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 create Impact by empowering all to make the most of our energy and resources, bridging progress and sustainability for all.

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, [making an impact together](#). 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 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 and our case management policy.

Table of Contents

Trusted Teams	4
1. Exemplify Our IMPACT Values	5
2. Create Equal Opportunities	6
3. Harness the Power of All Generations	7
4. Champion Well-Being and Collaboration	8
5. Be S.A.F.E. First	9
6. Protect Our People and Our Physical Assets	10
Trust with Customers and Partners	11
1. Strive for High Quality	12
2. Strive for Resiliency	13
3. Reach the highest standard for Cybersecurity and Sensitive Data Security	14
4. Drive Trusted Business decisions by managing Data Risks	15
5. Drive AI Adoption and Commit to Responsible AI	16
6. Prohibit any Form of Corruption	17
7. Require Third-Party Integrity	18
8. Avoid Conflicts of Interest	19
9. Uphold Fair Competition	20
10. Abide by Export Controls and Comply with Sanctions	21
11. Select and Manage Suppliers Responsibly	22
Trust with Investors	23
1. Prevent Insider Trading	24
2. Maintain Accurate Records and Ensure the Integrity of Schneider Electric's Financial and Non-Financial External Reporting	25
3. Deliver Solutions in Compliance with Risk Management Standards	26
4. Preserve our Information Technology Assets and Corresponding Intellectual Property Assets	27
5. Preserve our Reputation	28
6. Make objective decisions using Available, Reliable, Reusable Data	29
Trust with Communities	30
1. Minimize Impact and Dependency on Nature	31
2. Electrify the World while Mitigating Negative Impacts	32
3. Uphold Responsible Lobbying and Political Activity	33
4. Empower Local Communities	34
5. Do not use 'Conflict Minerals'	35
6. Act as Good Corporate Citizens	36

01



TRUSTED TEAMS



01

TRUSTED TEAMS



1.1 Exemplifying Our IMPACT Values

Culture is the collective beliefs, values, and attitudes of an organization. Culture matters to our customers, partners, investors, and all of us at Schneider. Our new IMPACT Values and Employee Values form the cornerstone of this proposition.

Schneider's culture, 'what we believe and how we work together,' differentiates and inspires us to share the future. It is something that must be nurtured and protected – not taken for granted. The IMPACT Values: Inclusion, Mastery, Purpose, Action, Curiosity, and Teamwork, represent our unique cultural DNA, our ideal behaviors, and day-to-day ways of working. These IMPACT Values are why people join, engage, and stay with us. Our Employee Values Proposition, "Impact starts with us," is based on the belief that impact requires collective effort from customers, partners, employees, suppliers, and communities. It is the company's promise to employees and an invitation for new talent. Leaders at Schneider Electric are the architects of our business and culture. Their role is to invent the future, deliver the mission together and build great teams, while creating a sustainable future for our people, customers, communities, and planet.



- Welcome unique differences and views, trusting positive intent
- Collaborate across the organization openly and effectively
- Innovate for the future with a visionary, disruptive and digital mindset
- Proactively develop skills and expertise to keep up with the market and adapt to new challenges
- Act with accountability and speed, simplifying and optimizing to delight our customers
- Making choices that contribute to our sustainability ambitions



- Exclude diverse points of view, stay silent in front of discrimination, intimidation, or disrespect
- Refuse to develop new skills, resisting to trying new things
- Sacrifice long-term success for short-term results
- Making sustainability conscious decisions only at work and ignoring them in personal life
- Micro-managing and compromising on quality
- Making decisions without seeking input from all relevant stakeholders



01

TRUSTED TEAMS



1.2 Create Equal Opportunities

As an impact company, Schneider Electric wants to create opportunities for everyone in our ecosystem to contribute to a meaningful and sustainable future.

In our operations, we strive to reflect the communities where we operate, provide equal opportunities to succeed, and we want all our people to feel respected, valued and safe to perform their best, whoever they are, however they look and where they come from. Because we believe that when we embrace diverse perspectives, we co-create a place where everyone belongs and thrives, not only Schneider Electric wins, but we create Impact for our customers, people, the planet and society. That is the I of our IMPACT Values: Inclusion. And that is what we mean by equal opportunities for all.



- Treat everyone with respect even if you disagree with them regardless of their position, or identity (gender, age, origin, way of thinking, belief, appearance, orientations, disability or status in society)
- Ensure the inputs and perspectives of everyone are heard
- Learn about and address the needs (physical, emotional, social) of others
- Point out and challenge biased decisions and suggest fair alternative solutions
- Speak up if you observe a discrimination or harassment of any kind
- Ensure equal pay for equal work and implement fair and equitable pay practices



- Exclude relevant colleagues in discussions, projects, email chains, or decision-making
- Make assumptions about others, their intentions, or perspectives
- Let biases drive decisions
- Neglect the specific needs and circumstances of others, including persons with disabilities
- Stay silent, tolerate, or allow intimidation, discrimination, or disrespect
- 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



1.3 Harness the Power of All Generations

We believe the best way to accompany one generation is to accompany them all.

We seek to create an open and supportive workplace where all employees are supported and empowered to grow to their fullest potential, developing new skills and building their careers for today and tomorrow. We want to support every employee to create their desirable professional future across all stages of their career, considering their unique journey and contributions. By harnessing the power of all generations, we can create teams with unrivaled skills and experience.



- Ensure equal 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 at every stage of their career, and through platforms such as the Schneider Career Hub
- Facilitate open discussions by dedicating time to meaningful career conversations at least once a year
- 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
- Make decisions or comments based on ones' age



01

TRUSTED TEAMS



1.4 Champion Well-Being and Collaboration

When people thrive at work, everyone wins.

In today’s fast-paced, digital, and interconnected world, well-being and collaboration are essential for performance, innovation, and resilience. At Schneider Electric, we’re committed to creating an environment where people feel healthy, safe, and empowered to thrive. That’s why we support the physical, mental, social, and financial well-being of our people. We also actively promote *Working Smart*, so we know why we work, what we work on, and how to best collaborate leveraging digital to free energy. At Schneider Electric, we call it Care by Design.



- Set clear expectations and priorities
- Manage workloads effectively and with agility
- Ask for help when needed
- Check in regularly with yourself and others
- Always assume positive intent, and be tough on the problem, not the people
- Create space for honest dialogue and learn from mistakes
- Support ways of working and individual needs conducive to greater productivity
- Leverage digital tools to collaborate across teams, share knowledge, mentor others, and build strong partnerships



- Ignore signs of stress or disengagement
- Interrupt or dismiss others
- Fear to say “No” or “I don’t understand”
- Exclude or overlook voices
- Judge or dismiss flexibility needs
- Overcommit yourself or others
- Treat work as transactional
- Withhold information or support



1.5 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 fundamental value of our brand and our company, that we never compromise. 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, 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
- Report all opportunities and events to continuously improve our health and safety systems, and share solutions so others can learn
- Engage in Health & Safety initiatives and take leadership to build a resilient Safety Culture



- 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
- Ignore an unsafe situation



01

TRUSTED TEAMS



1.6 Protect Our People and Our Physical Assets

Protecting our people and physical assets is essential to sustain our strategic growth. Security is everyone's responsibility.

At Schneider, we prioritize the protection of people and assets by strategically implementing industry-recognized security control. This includes processes to identify risks and the deployment of security risk management programs. We recognize that a strong security culture requires everyone to take responsibility to safeguard themselves, colleagues, and physical assets, which can be achieved by adhering to security policies and best practices to prevent any potential risks.



- Stay alert and ensure security at the workplace or while traveling
- Maintain security mindset and attitude to protect oneself, colleagues, and company assets
- Follow site security controls and travel security procedures
- Always protect assets and minimize known risks
- Promptly report any suspicious activity or security incidents



- Assume that security awareness and protective measures are someone else's responsibility
- Ignore or bypass established security protocols
- Leave company assets unattended or unsecured
- Share access credentials, badges, or sensitive information with others
- Prop open secure doors or allow tailgating into the building or sensitive areas

02



TRUST WITH CUSTOMERS AND PARTNERS



2.1 Strive for high quality

Because quality is the foundation of safety, trust, and performance—we commit together to deliver excellence in every product, service, and interaction.

Our ambition is to embed shared responsibility for quality across all teams and geographies, empowering every employee to act with accountability, innovate with purpose, and protect what matters most: our customers, our people, and our planet. By doing this, we not only meet expectations—we elevate them, ensuring that quality becomes a lasting competitive advantage.



- 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



02

TRUST WITH CUSTOMERS AND PARTNERS



2.2 Strive for Resiliency

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

We have standardized processes to conduct risk assessments, business impact analysis, and critical issue escalation. We are prepared to manage any negative event, regardless of its level of complexity and geographic scope through established Emergency Plans, Business Continuity Plans, and Crisis Management Plans. Our local leaders are empowered to assess risks, increase their preparedness and handle all types of negative events with a rapid and effective response and effective recovery.



- Anticipate and 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
- Assume that day-to-day personnel, resources, procedures, and networks are sufficient to meet and overcome a business interruption or a crisis



2.3 Reach the Highest Standard for Cybersecurity and Sensitive Data Security

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 the National Institute of Standards and Technology (NIST), follow globally recognized standards¹ 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](#).

¹ Such as ISA/IEC 62443, ISO 2700x

² Founding member of the ISA Global Cybersecurity Alliance and a member of the Cybersecurity Coalition and the Cybersecurity Tech Accord



- Comply with international cybersecurity and data security regulations and standards, 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 by providing timely vulnerability and security notifications as well as responding to 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 and collaborate when responding to 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, when applicable
- Promote a culture where cybersecurity is everyone's responsibility and encourage a transparency mindset regarding potential cyber risks reporting



- Consider cyber risks as technical issues separate from business risks
- Assume regulatory compliance is sufficient and guarantees cybersecurity
- Delegate responsibility for cyber risk management to others (e.g. suppliers, partners..)
- Become complacent when reading unfamiliar emails or web browsing
- Ignore our cybersecurity and data security policies



2.4 Drive Trusted Business decisions by managing Data Risks

Data is the lifeblood of our Digital Ecosystem, and we are committed to governing and securing it. We do this through a comprehensive Data Risk Management framework, embedded in our Enterprise Risk Management System. Where data is a product outcome of our Data Supply Chain, we assure an emphasis on risk throughout the Data Supply Chain focusing on both Data Assurance and Data Scalability, supported by policies, risk indicators, and collaborative assessments. By upholding strict standards, controls, and best practices, we ensure all data is managed responsibly and transparently in compliance with regulations, especially as innovative technologies like AI and data science increase the need for robust data risk management.



- Adopt the Data Risk Management Framework (covering privacy, retention, deletion, protection, residency, migration, 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
- Enhance algorithmic transparency of our Artificial Intelligence systems and other automated decision-support solutions, without compromising data confidentiality or the protection of intellectual property
- Upskill Data competencies, leveraging the Data and AI Academy of Schneider Electric



- 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



2.5 Drive AI Adoption and Commit to Responsible AI

At Schneider Electric, we are leveraging artificial intelligence (AI) technologies to contribute to the transformation of energy management and industrial automation, aiming to foster a more sustainable world. From enhancing customer applications to optimizing internal processes, we are exploring how AI can address critical challenges such as climate change, energy efficiency, and business resilience.

To drive efficiency and innovation and build trust, we are committed to creating and using trustworthy AI solutions by addressing environmental, ethical, societal and technical issues such as sustainable impact, bias, robustness, transparency and data protection.

As part of the process we establish clear lines of oversight and accountability, as well as monitoring and auditing processes to ensure compliance with regulations and ethical guidelines.



- Adopt a Responsible AI framework aligned with our Trust principles and our long-term commitments to Sustainability
- Develop, provide and use AI systems in compliance with applicable laws and regulations
- Foster a Responsible AI culture and upskill our global workforce, so that every employee is empowered to work efficiently and responsibly in collaboration with AI systems
- As appropriate, maintain human oversight and controls over AI systems and actively work to identify and mitigate bias which may have negative or significant legal effect on individuals
- Ensure, to the extent possible, transparency and explainability of AI systems and continuously monitor their performance and impact
- Address potential AI algorithms biases, aiming for equal treatment and respecting individuals' legal rights
- Collaborate with stakeholders to address societal challenges and ensure responsible use of AI
- Promote cybersecurity practices across the organization to ensure robustness of our AI systems



- Compromise on Responsible AI
- Misuse AI in a manner as to violate human rights and civil liberties
- Implement or use AI systems leading to biased decision-making
- Develop, source or implement AI systems without checking their compliance with applicable AI regulations



02

TRUST WITH CUSTOMERS AND PARTNERS



2.6 Prohibit any Form of Corruption

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 a trusted manager, a Regional Compliance Officer, a legal counsel or a Human Resources Business Partner or use Trust Line, Schneider Electric's whistleblowing system, 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



2.7 Require Third-Party Integrity

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 in respect of indigenous people rights. 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



2.8 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, suppliers, or business partners, 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 a Regional Compliance Officer, 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



2.9 Uphold Fair Competition

When companies compete fairly and ethically, trust is built—laying the foundation for innovation, better pricing, and sustainable growth.

As an ethical organization, we are committed to complying with all applicable competition laws and regulations and avoiding any conduct that could violate or appear to violate them.



- Keep yourself informed on our Global Competition Law Policy as well as on competition law compliance, especially if you are operating in sales, marketing, procurement, HR, data, and leadership roles
- Treat distributors, partners, and resellers fairly and ethically
- Set our commercial strategies, bids, prices, and discounts independently—without coordination with competitors, manufacturers, distributors, partners or resellers
- Ensure all information exchanges with suppliers, distributors, partners, resellers and the market comply with relevant laws, regulations, and internal policies
- Act promptly if you receive confidential information from or about a competitors. Cease communication immediately and contact your manager or Local Legal Counsel for guidance
- Ensure that our third-parties (e.g. consultants, agents, or joint venture partners) also comply with competition laws on your behalf
- Seek legal guidance before placing any restrictions (e.g. pricing, territorial, or online sales) on suppliers, distributors, partners, or resellers
- Speak up if you have any concerns or if you suspect any behavior that may violate competition laws or pose a compliance risk



- Share any confidential information with competitors or coordinate (directly or indirectly) on pricing, margins, strategies, market share, production volumes, bids, product developments, or customer/supplier dealings
- Divide or allocate customers, bids, business opportunities, territories, or markets with competitors
- Agree with competitors not to hire each other's employees or coordinate salaries or employee benefits
- Impose fixed or minimum resale prices, margins, or maximum discounts/rebates on distributors, partners, or resellers
- Make anticompetitive suggestions or use misleading language that could be perceived as such
- Ask current or former employees of our competitors to share confidential information about those companies
- Ignore red flags—such as competitors suddenly aligning prices or market behavior—without reporting them
- Assume informal or social settings (e.g. dinners, conferences) are exempt from competition law rules



2.10 Abide by Export Controls and Comply with Sanctions

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
- Follow and comply with the Schneider Electric Export Control policy and directive



- 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



2.11 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 supply 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
- Honor our contractual agreements
- 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
- Encourage our suppliers to deploy sustainable procurement practices to their own suppliers
- Build a resilient supply chain, through collaboration and anticipation



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



TRUST WITH INVESTORS



03

TRUST WITH INVESTORS



3.1 Prevent Insider Trading

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



3.2 Maintain Accurate Records and Ensure the Integrity of Schneider Electric's Financial and Non-Financial External Reporting

All our financial and relevant non-financial reporting and disclosures must be accurate, complete and substantiated by properly maintained records to present a true and fair view of Schneider Electric's financial position and performance, as well as ESG (Environmental, Social, and Governance) metrics.

Such reporting must be done in accordance with the International Financial Reporting Standards (IFRS) and the European Sustainability Reporting Standards (ESRS) as well as comply with applicable legal and tax regulations to ensure the consistent delivery of transparent, relevant, and reliable information to investors, shareholders, regulators, and other stakeholders.



- Follow Group Accounting Policies and reporting guidelines to ensure compliance with applicable standards
- Enforce internal controls and standardized processes to ensure that all financial and relevant non-financial records are accurate, complete, and reliable
- Continuously improve and adapt processes to meet or exceed industry best practices
- Adhere to recordkeeping guidelines to ensure secure and compliant maintenance of all records
- Collaborate fully with internal and external auditors to support transparent and effective audits
- Strictly comply with tax regulations in every country where Schneider operates, always act in good faith and with integrity



- Make any exceptions to established financial processes or override internal controls
- Manipulate financial or non-financial information to mislead stakeholders
- Buy, sell, transfer or dispose any of Schneider Electric's assets without proper authorization and complete documentation
- Accept cash transactions unless no alternative is available, and only within legally authorized limits, with explicit approval and proper recording
- Conceal payments through third parties or process transactions lacking proper supporting documentation
- Knowingly evade tax obligations or engage in practices that could be perceived as tax avoidance



3.3 Deliver Solutions in Compliance with Risk Management Standards

Ranging from simple engineered-to-order solutions to complex integrated ones, our solutions are independently assessed by risk experts.

These experts perform a neutral and holistic risk reviews to advise Business Leaders acting as Approvers before the bid is submitted and the contract executed.



- Implement a sequential business opportunity review and approval methodology, in compliance with our Charts of Authority
- Coordinate with operational, financial, contractual and regulatory, and supply chain risk experts to assess project risks and propose mitigating actions
- Identify and assess at the earliest stage of our projects' opportunities, potential Environment, Human Rights and Business Conduct impacts
- Consult experts qualified to assess our liability and overall contractual and operational risks exposure before approving contracts
- Secure cash and margins to comply with all applicable laws, regulations, and standards through accurate and timely reporting
- Identify project performance obligations in accordance with International Financial Reporting Standards (IFRS)
- Check our ability to design, qualify, manufacture, and deliver solutions to meet customer specifications
- Run comprehensive, substantiated and independent assessment so Approvers make informed decisions



- Bid a solution without expert analysis and approvals per our Charts of Authority
- Accept entering contracts generating excessive or uncontrolled liability exposure without Group CFO 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
- Enter contracts that could expose us to violating Export Control and more generally trade compliance regulations
- Raise customer expectations that don't coincide with our Chart of Authority's approved mandate
- Commit on a project that triggers Environment, Human Rights and Business Conduct impact



3.4 Preserve our Information Technology Assets and Corresponding Intellectual Property Assets

Our IT (Information Technology) and IP (Intellectual Property) assets enable us to achieve efficiently 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

03 TRUST WITH INVESTORS



3.5 Preserve our Reputation

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

Company information is valuable, and the unauthorized disclosure of internal information can be detrimental to Schneider’s corporate reputation. We strive to honor our commitments in both financial and non-financial matters, communicating regularly and transparently about our progress. We are committed to being a global industrial technology leader in electrification, automation, and digitization. In line with our mission, we use good judgment in our responsible marketing and communications efforts to be the trusted partner in sustainability and efficiency.



- Demonstrate ethical and professional behavior in our external and internal engagements to protect Schneider’s reputation
- Use current versions of official communication templates, materials, standards, and guidelines
- Be thoughtful about social media posts and public engagements ensuring they are in line with policies and guidance
- Respect confidential information by signing Non-Disclosure Agreements where necessary and avoid discussing confidential or material topics in public places
- Be thoughtful and ensure appropriate approvals are in place when addressing complex or sensitive subjects like financial disclosures, and geopolitical or social-cultural issues
- Adopt robust marketing practices related to sustainability, based on science and standards, to avoid greenwashing



- Speak with the media about the company, unless you are an authorized and certified Schneider spokesperson
- Share any confidential or proprietary or material corporate information such as but not limited to: R&D, mergers, investments, acquisitions, divestments, financial performance, intellectual property, internal documents or customer and employee information.
- Involve Schneider in personal convictions and beliefs
- Express personal opinions about Schneider through official communication channels, including social media
- Disparage Schneider or colleagues in any public or digital space



3.6 Make objective decisions using Available, Reliable, Reusable Data

At Schneider Electric, we believe in a data backed execution of our Strategy. Everything starts with an understanding of which purpose and for which decisions data is needed. It is everyone's business at Schneider as we all protect, create, standardize 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 defines SE's data strategy and supports a Data-Backed Execution of Strategy across the organization. This strategy is brought to life through our Data Supply Chain approach and is guided by our core principles, the 4 Data Golden Rules:

- Golden rule #0 – Data Risks
- Golden rule #1 – Governed Authoritative Sources
- Golden rule #2 – Governed Group Referential
- Golden rule #3 – Governed Group Data Platforms

Schneider Electric must adequately comply with those data golden rules from data creation to consumption, while always protecting data.



- Apply the 4 Data Golden Rules to drive assurance, trust and scalability
 - Apply the Data Risk Management framework
 - Use Authoritative Data Sources
 - Categorize data using Company Referentials
 - Create reusable data, that is distributed to governed SE data platforms only
- Ensure that Performance Measurement relies upon objective and unbiased datasets
- Implement the appropriate governance by establishing and leveraging the internal network of experts, our Data Offices & Data Domains.



- Use data for key decisions that does not comply with the 4 Data Golden Rules
- Create an alternative data set 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
- Think about data too late, typically once a system is about to be deployed

04



TRUST WITH COMMUNITIES



04

TRUST WITH COMMUNITIES



4.1 Minimize Impact and Dependency on Nature

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



- Comply with high environmental and social standards and regulations
- Report environmental abuses for investigation and remediation
- Maintain robust environmental management systems (ISO14001)
- Prevent and control pollution
- Strive to adopt end-to-end circularity to decouple business growth from resource extractions
- Innovate with offers circular by design, enabling increased life cycle services and efficient maintenance
- Include recycled materials in our products without compromising on safety and quality
- Reduce waste intensity per turnover
- Disclose environmental information about our products
- Strive to mitigate our main direct impact on nature
- Support nature-based solutions for climate adaptation and high-quality carbon removal strategy
- Run due diligence for key customer projects to fully understand environment & social risks



- Practice the planned obsolescence of our products
- Consider the environment secondary to our business priorities
- Overlook local Extended Producer Responsibilities (EPR) and product substances regulations
- Intentionally disregard our indirect impact on biodiversity



4.2 Electrify the World while Mitigating Negative Impacts

We take our Net-Zero commitment very seriously, and help our customers drive their business growth while reducing their carbon emissions. We share this responsibility and the associated ambitions with our employees, customers and other stakeholders.



- Increase our customers' energy efficiency, accelerate electrification, enable the growth of renewable energy and reduce CO₂ emissions accordingly
- Embed climate impacts as part of our corporate and industrial strategy
- Act with suppliers to reduce emissions throughout our supply chain, with a holistic lifecycle perspective, including the reduction of CO₂ emissions from our sites and facilities, leveraging Schneider Electric's offers and technologies
- Disclose detailed information of the carbon footprint of the company regularly, in line with best practices in terms of carbon accounting
- Support the development of climate adaptation plan in our priority sites to drive climate resilience in our operations and value chain
- Empower our employees, partners, and customers to reduce their carbon footprint
- Neutralize residual emissions with high-quality carbon removal, in line with our Net-Zero commitments
- Use our voice to advocate for the policies and system changes required to make progress on climate



- Merely comply with laws and regulations; on the contrary, we strive to set and achieve ever more ambitious goals

04 TRUST WITH COMMUNITIES



4.3 Uphold Responsible Lobbying and Political Activity

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 and representation 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



- Intervene in an election by taking a partisan position on behalf of Schneider
- Make corporate contributions (either monetary or in-kind) to political candidates, parties or similar bodies
- Get involved in unauthorized political activity or representations on behalf of Schneider
- Interact with public officials or participate in a way that could be considered as taking a partisan position or which may compromise Schneider's reputation



04

TRUST WITH COMMUNITIES



4.4 Empower Local Communities

We leverage our global presence to support less-privileged communities through charitable contributions, donations and training. In the meantime, we actively seek to avoid potential adverse impacts for communities in our value chain through our vigilance plan.



- 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
- Evaluate potential impact of our activities in value chain and take appropriate steps to minimize impact on potentially affected communities



- 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
- Take part in projects which could potentially have severe human rights impact

04 TRUST WITH COMMUNITIES



4.5 Do not use ‘Conflict Minerals’

We do not use any products or raw minerals 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
- Participate in business coalitions to improve traceability and develop strong environmental and social standards



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

04 TRUST WITH COMMUNITIES



4.6 Act as Good Corporate Citizens

a) Protect Workers from Abusive Working Conditions

We believe in dignity, respect, fairness and protecting workers from abusive working conditions, including children, forced or other improper labor. We promote decent working conditions (such as working time, living wages, safety) within our own operations as well as our suppliers. We expect our suppliers, subsidiaries and customers to act similarly for the respect of all Human Rights.



- Respect and uphold all human rights, of all workers, at all times employed directly or indirectly
- Upskill the workforce as appropriate for continued employability
- Focus on the physical as well as mental health of the employees
- Provision of leaves and flexible work arrangements for employees, as appropriate to ensure the care and familial responsibilities can be fulfilled
- Value our suppliers and subsidiaries' workers as we do 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
- Forced labor/modern slavery, child labor and human trafficking in company operations; however, if ever such a case is observed, provide appropriate remediation to the victims, in line with global best practices including recommendations from International Labour Organization (ILO)
- Not engage workforce via forced Prison Labour
- Charge any fees for recruitment, either directly or indirectly



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

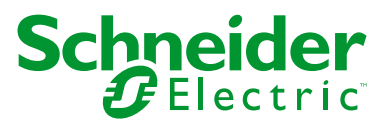
We uphold our employees' right to set up associations and recognize their right to collective bargaining. In accordance with local regulations, our employees are free to join, take part in or leave labor organizations that maintain and defend their interests. We follow all the requirements to build and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



[Learn more](#)

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