

MAGOTTEAUX

Code of ethics

(2017-1)

1. INTRODUCTION

The Magotteaux group enforces the Sigdo Koppers code of ethics stating the values, principles and behaviours defined by Sigdo Koppers as essential and promoted within the whole group (“SK Group”).

Consistent with the SK code of ethics, the following pages contain the code of ethics of the Magotteaux group (“Code”). The implementation of the Code involves the support of the management authorities (namely the boards of directors) of all the Magotteaux companies.

The Code governs - in addition and subject to specific or more restrictive local legislation - the relationships between all the internal partners (such as the Magotteaux affiliates) and external partners (such as public institutions, banks, suppliers, customers, agents, auditors, advisors, general community).

2. OBJECTIVE

The objective of this Code is **to describe the commitment of the Magotteaux group** in promoting an ethical behaviour in its business relationships and operations.

The Code is a document that **includes a set of rules** regulating the behaviour of individuals; it establishes an ethical framework of principles, values and conducts that must guide the performance and behaviour of the Members (as defined hereafter in **Section 3**).

This Code will be **used to guide the course of action** for all the Members in the organization, and promote a positive work environment, so they can establish a relationship with namely customers, suppliers, private and public institutions and the general community in the best possible way.

3. SCOPE

The Code is mandatory for all the directors, executives and workers ("**Members**"). Each party is responsible for reading, knowing and strictly complying with this Code.

As such, each local board of directors (or equivalent) will inform the local management who is in charge of properly organizing the Code distribution to the executives and workers as well as its translation (if/where needed). This distribution includes the signing of an acknowledgement of receipt pertaining to the Magotteaux Code of ethics (see template in **Annex 1**).

Any doubt that may arise in relation to this Code must be passed on to the respective manager or to the Ethical Committee¹.

This Code will be uploaded on the Magotteaux intranet platform.

The Magotteaux Group SA board of directors reserves the right to modify this Code at any time or under any circumstance. Any modification will be communicated to all Members through the local board of directors (or equivalent) and the local management responsible for its implementation.

4. D.N.A., MISSION, STRATEGIC GOALS AND PRINCIPLES OF MAGOTTEAUX

4.1. D.N.A.

It is our DNA to be the world-leading supplier of process optimization products & services for high-abrasion extracting industries.

4.2. Mission

Our Mission is to achieve profitable growth through attractive offerings that support customers' results within a year.

¹ **Ethical Committee:** see Section 7

4.3. Strategic goals

Our three strategic goals are (i) to be in the top 3 players in all markets we serve, (ii) to reach a 14% EBITDA margin minimum and at least 15% ROCE and (iii) to have at least 95% of satisfied customers.

4.4. Critical success factors

Aside from the strategic framework considerations that are the DNA, the mission and the strategic goals, we defined 8 critical success factors:

1. Enhancement of customer process improvement capabilities
2. Value-added packages of products and services with rapid paybacks
3. Customer intimacy and account planning
4. Alignment of R&D focus with strategy and highest profit business
5. Development of a significant, still affordable presence in China
6. Investment and divestment, or improvement of operations to create or maintain a competitive manufacturing footprint and/or sourcing
7. Optimal total delivery-time (order to customer delivery) at the right quality
8. Lean & efficient organization fostering team work and balancing the advantages of economy of scale and local entrepreneurial spirit

4.5. Company principles

The Magotteaux group subscribes to the Sigdo Koppers principles as described below:

1. Excellence

We finish everything we start in an appropriate manner.

The value of excellence implies the sum of efficiency, continuous improvement and motivation in relation to the work done, which generates a final quality result and provides those who perform it with an added value that makes a real difference against their peers.

2. Integrity

Our actions will give us recognition.

Integrity is conceived as transparency, rectitude and probity, acting consistently according to our values and giving everyone equal treatment.

3. Commitment

We feel that everything we start is ours.

Commitment is the guarantee certificate of our work, a high sense of duty, the compliance with our obligations in the different aspects of our life; it is making Sigdo Koppers S.A.'s mission part of us.

4. Team work

Let's become part of our companies.

Team work is a value of the SK Group. All the members of this organisation are committed to reach the objectives behind the different assigned tasks, favouring team work and company interests over individual and/or personal interests. Team work generates the synergy required to perform the work in an efficient and qualitative manner.

5. Determination

Even if difficulties arise in our work, we will do everything possible to comply with the commitments.

Determination is to do everything required in order to reach an objective. The SK Group does everything required for complying with acquired commitments, either with customers, suppliers or collaborators, delivering satisfaction with respect to provide goods and services.

6. Compliance

If we commit to something, we do it in line with the values of our organisation, and if unexpected events prevent us from complying with a commitment, we communicate this fact in a timely manner.

The SK Group carries out actions in accordance with their values and principles. Whenever a responsibility is assumed, it is performed in good

faith and based on assumed commitments, orienting efforts to achieving the objectives. If unexpected events arise, they are communicated in a timely manner, preventing the various interests from being affected.

7. Respect

We always look at the situation of others, from their perspective. We look at others from what they are and what they say.

Respect means valuing others, accepting their authority and considering their dignity; this is how we can contribute to the development and growth of all the members in the SK Group. It is a guarantee of absolute transparency and creates an atmosphere of cordiality and security; it can be used to accept the limitations of others and recognize their virtues.

8. Honesty

We base our relationships with others on truthfulness.

Honesty is the quality that we mostly look for and demand in people. This is an essential value for human relationships to create an atmosphere of confidence and harmony, guaranteeing support, security and credibility in people.

9. Responsibility

If we accept a job, we are responsible for the duties and obligations involved.

This means assuming the consequences of words, decisions, commitments and, in general, of the free and voluntary actions performed, not only when results are satisfactory and rewarding, but also when they are unfavourable or undesirable. Also, responsibility is doing what corresponds to us in the best way possible, with effectiveness, quality and commitment.

5. BUSINESS CONDUCT GUIDELINES

All SK Group members must comply with professional obligations and are submitted to the applicable legal system in force. The SK Group also expects them to:

- Foster inside the SK Group a healthy coexistence and mutual respect among all members of the organization and be especially interested in developing good human relationships
- Comply with the provisions established in the internal regulations on Environment, Health and Safety in the SK Group
- Know, apply and transmit the values and principles supported by the SK Group
- Protect SK Group's image and prestige
- Practice comradeship and loyalty
- Maintain transparency and probity in all SK Group's actions, according to the legislation in force and internal regulations
- Protect the dignity of work colleagues and respect individual, cultural, gender-based, ethnic, religious, ideological differences or others
- Provide our customers and suppliers with appropriate, diligent and kind treatment in accordance with the SK Group's mission.

6. BUSINESS CONDUCT RULES

6.1. Conflict of interest

All Members must always act in the best interest of the SK Group and refrain from favouring their own personal interests while exercising their roles.

A conflict of interest exists when a Member's personal interest conflicts with the Group's interests and when such personal interest unduly influences or inappropriately interferes with the Member's business judgements, decisions or actions.

Each time a conflict of interest exists, the Members are expected to disclose it immediately. Furthermore a statement on conflict of interest must be signed by the

main executives² each year and filed with the Ethical Committee.

6.2. Confidential information

Confidential information is the information or knowledge created or acquired by the SK Group and which must be protected from inappropriate public disclosure, communication or appropriation.

Every worker must guarantee that the confidential information under their responsibility and/or control is appropriately protected, and will not be disclosed by them either to their own benefit or with purposes different from those agreed upon with the SK Group, even after termination of their employment contract.

6.3. Non-discrimination

Every person will receive equal treatment in the Magotteaux Group; none will be discriminated against for reasons such as gender, marital status, sexual orientation, age, religion, race, public opinion, social and economic class, pregnancy, language, dialect, ethnic origin, nationality or disability.

6.4. Anti-corruption

The SK Group is firmly opposed to any kind of corruption, including extortion, subordination and bribery.

As a consequence, business practices aiming at obtaining benefits by using inappropriate or incorrect means are strictly prohibited.

Members are strictly prevented from making and/or receiving an improper payment, including facilitating payments to/ from any worker, official, agent, or member of any government, commercial entity; or individual in the conduct of the Magotteaux activity or business.

² **Main executive** means: functions corresponding to 19 and above in the Magotteaux job description scale.

6.5. Consumption of alcohol and drugs

Each Member is responsible for taking appropriate measures to avoid work accidents and illnesses, and contributing to a healthy and safe work environment. The Members are required to attend work in an appropriate physical and mental condition in order to successfully perform their roles.

It is strictly prohibited to be under the influence of, to bring, sell, use, produce or distribute any alcohol or drug on the Magotteaux premises.

Taking licit medicines is allowed in the work place (with or without medical prescription) to the extent that it does not affect the Member's capacity to perform their essential roles in an efficient and safe manner.

6.6. Sexual harassment

Any kind of sexual harassment is strictly prohibited in the SK Group. All administrative and legal measures will be taken in case of filed, investigated and verified complaints.

Sexual harassment includes any inappropriate sexual suggestion or insinuation, request for sex or other verbal or physical sexual conduct. Conducts involving sexual harassment include:

- Inappropriate sexual insinuations
- Sexual verbal conduct
- Sexual physical conduct (touching someone in an unnecessary or offensive manner)
- Preventing someone from moving
- Showing sexually suggestive objects or photographs

6.7. Gifts, services and other courtesies

To give or receive gifts or invitations for entertainments can create a conflict of interest or be considered as corruption under certain circumstances. Consequently, the Members should refrain from giving/receiving gifts or invitations to/from third parties, if they could be reasonably perceived as incentives or commitments, or when such an action may damage or affect the image and reputation of the SK Group.

Gifts, services and other courtesies for the benefit of current and potential customers or suppliers are allowed and acceptable only in compliance with the existing laws and for legitimate business reasons. In all cases, such courtesies must be lawful and require authorization from the giver's or receiver's immediate supervisor. Any resulting expenses must be specifically recorded in exact accordance with the established Magotteaux procedures.

Workers are not allowed to seek or structure negotiations on the basis of any gift, service, or other courtesy to or from a customer or a supplier. Workers are not allowed to receive gifts, services or other courtesies from suppliers, except for legitimate promotional materials, services, or other courtesies in line with standard business practices. If accepted, such courtesy requires the written consent of the recipient's immediate supervisor and, most importantly, must not compromise or appear to compromise any negotiations or create an expectation of personal obligation.

6.8. Environment, Health and Safety (see Annex 2: EHS policy)

The SK Group's primary objective is to protect the environment, health and safety. The SK Group does its utmost to develop and provide goods and services that are safe to use for their intended purpose and without any inappropriate environmental impact. These goods and services must be efficient in terms of energy and natural resources and can be recycled or disposed of in a safe manner.

All Members must perform their tasks and responsibilities in compliance with the applicable legislation and regulations related to health and safety in the workplace and to prevention of environmental pollution.

6.9. Relationship with customers

The SK Group's commitment to customer satisfaction must be reflected in the respect for their rights and the constant search for solutions to satisfy their interests, always in accordance with the SK Group's development and profitability objectives.

In order to preserve the highest degree of confidence by its customers, the SK Group adheres to a policy in which all the confidential commercial and business information obtained from our customers will be protected from inappropriate public disclosure, communication or appropriation. Exceptions to this are those cases where the disclosure is required or authorized by the customer or by law. This commitment will continue even when the commercial relationship is finished.

6.10. Relationship with suppliers

The relationship between the SK Group and the suppliers must be maintained under strict independence and in the SK Group's interests in terms of utility, quality, opportunity and budget.

Selecting and signing a contract with suppliers must always be based on technical, professional, ethical criteria and on the SK Group's requirements. Proposals will be chosen following objective factors, such as competence, timeliness, price and quality. Selection procedures must be transparent, established before the selection, and demonstrable if needed. Negotiations with companies or individuals on which reasonable doubts on probity or ethics exist should be avoided.

6.11. Delegation of authority to workers

Workers must take special care in situations where they must act on behalf of Magotteaux as a result of their position or by express delegation. Therefore, they must refrain from acting on behalf of Magotteaux if not authorised and must take special care in the relationships with civil servants and public authorities. For this

purpose, the workers should always ensure that they have the appropriate authority.

6.12. Criminal responsibility of legal persons

The SK Group promotes compliance with laws establishing the criminal responsibility of legal persons for crimes such as asset laundering, financing of terrorism, domestic or foreign civil servant bribery.

Consequently, the SK Group expressly prohibits any conduct that may result in criminal imputation of a Magotteaux company under criminal law for the actions performed by the Members.

6.13. Fair competition

The SK Group promotes and respects fair competition, which is an essential value that must govern all aspects of our business. Competition encourages efficiency and creativity, and it also enables us to establish fair and equal relationships with customers.

Competitive actions are ruled by the Magotteaux Group's commercial objectives and by specific considerations of the market in which it operates. As a result, the Members must ensure that all agreements with competitors, customers or suppliers comply with competition regulations.

6.14. Risk management (see Annex 4: Risk management policy)

The SK Group created a risk management policy to provide reasonable security in order to reach strategic, operational and financial objectives, maximising the SK Group's value.

With regard to Magotteaux, this policy is aimed at identifying, analysing, monitoring and communicating the risks that exist in the Magotteaux group.

6.15. Backup procedure of the Magotteaux Group SA board of directors

The Magotteaux Group SA board of directors will comply with the following:

- The annual calendar for Directors' meetings is drawn up by the Chairman of the board with the support of the CEO and the Board Secretary.
- The supporting documents for the board meetings are stored in a safe digital location.
- The signed minutes are saved in a safe place in a physical and digital format by the Board Secretary.
- The Code and its associated policies are reviewed by the board of directors once a year.

7. ETHICAL COMMITTEE

The Magotteaux ethical committee ("Ethical Committee") members are the CEO of Sigdo Koppers SA and two Magotteaux Executive Committee members.

The main accountabilities of the Ethical Committee are described below:

- To promote the SK Group's ethical values and behaviours within the Magotteaux group
- To facilitate the resolution of conflicts related to the application of the Code, acting as an arbitrator between the parties
- To report complaints (if any) to the Magotteaux Group SA board of directors
- To propose updates and modifications to the Code
- To provide the required instructions for developing and complying with the Code.

8. COMPLAINT and WHISTLEBLOWING

8.1. Whenever Members face a situation in which they are not sure whether the unethical conduct is involved, the following questions can be served as guidelines:

- Is it consistent with the values of the Group and my own values?
- Is it illicit?
- Is it unethical?
- Is it something I want to be responsible for?

After answering these questions, if Members still have doubts on how to act when faced with a specific situation, they may consult their respective manager or Ethical Committee.

8.2. In case of (suspicion of) offence under the Code (including complaints related to money laundering, corruption (bribery) and the financing of terrorism), the Members should inform the Ethical Committee which is in charge of deciding upon the case as well as the disciplinary measures and legal measures (if any).

The complaint procedure guarantees the anonymity of complainants.

The Ethical Committee can summon the parties involved in order to analyse the situation and gather background information. If any member of the Ethical Committee is involved in that offence, that member must refrain from participating in the meeting.

9. DISCIPLINARY MEASURES / LEGAL MEASURES

Any infraction to the Code by the Members will be investigated and disciplinary and/or legal measures will be applied (depending on the offence) by the Ethical Committee. The measures to be applied can include notably verbal or written reprimands, warnings and termination of the employment contract, as the case may be.

In addition to the party who fails to comply with the Code, all of the following people will be subject to these measures: i) those who did not take reasonable care in detecting an infraction, ii) those who should have given the requested information regarding the infraction but who refrained from giving it, and iii) supervisors approving or allowing infractions, or attempting to take reprisal measures against workers and/or advisors who claim against infractions or against authors of infraction.

10. VALIDITY

This Code will enter into force on January 1st, 2018, upon approval from the Magotteaux Group SA board of directors and will be revised annually as required.

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Annex 1 - Statement of receipt for the Magotteaux Code of ethics (Section 3)

In _____ (*localization*), on _____ (*date*),
Mr/Mrs _____, as _____ (*title*)
of _____ (*name of the company*):

- I confirm that I have received, read carefully and understood the Magotteaux Code of ethics ("**Code**").
- I declare that I will comply with the terms included in the Code and with all policies and procedures that apply to my job.
- I am responsible for preventing any activity, relationship, position or investment from interfering (or which may interfere) with my capacity to act in an objective, honest manner and always seek the best possible benefit for the Sigdo Koppers group ("**SK Group**").
- I will inform through the complaint procedure established by Magotteaux on any failure to comply with the Code, irregularity or illegal action involving Magotteaux, its workers, directors, executives, as well as its customers or suppliers.
- I will inform the Magotteaux Ethical Committee if I am involved in any situation that may result in a conflict of interest like, for example, significant financial participation in the competitors or suppliers' business, relatives in high-ranking positions of companies belonging to the competition, social or family relationships with suppliers, among others.
- I commit to cooperate with Magotteaux in everything related to the implementation and dissemination of the Code. I will not take reprisals against anyone who honestly and in good faith informs on infractions to the Code.

Below, and according to that established in the Code, I declare the following situations that the Magotteaux Ethical Committee should know about:

_____.

(*Signature*)

Annex 2 - Environment, Health and Safety policy (March 2017) **(Section 6.8)**

We, in the Magotteaux Group, strive to guarantee the safety and wellbeing of our personnel, visitors and subcontractors, promote social accountability with our stakeholders, minimize our activities' impact on the environment and insure the quality of the products, solutions, and services we provide to customers. These four pillars are keys to our Mission.

This policy intends to do more than fulfill our legal obligations, required or voluntary commitments. It must lead each and every one at Magotteaux to act responsibly within our communities, respect human integrity and contribute to the preservation of our planet for the sake of future generations. Furthermore, Magotteaux wishes to protect the company's assets including people, product, physical and virtual assets, financial assets, intellectual property, and proprietary information through dynamic loss prevention, property conservation, and risk management.

To pursue this Integrated Policy, we have communicated to everyone working at Magotteaux, working on its behalf, and to any other stakeholder, the goals and indicators allowing for the performance monitoring and continuous improvement of our EQHSS Integrated Management Systems.

These steps toward continuous improvement are based on the development of individual responsibility and the mobilization of all personnel, at every level.

The present Integrated Management Policy must lead to continuously improve, on the basis of best available technologies not entailing excessive costs (BATNEEC).

From this vantage point, we've set up an organization and defined preventive methods of analysis for all our branches of activities, aiming at the following achievements:

- Preserve the health, safety and wellbeing of all our workers.
- Minimize consumption of natural resources and limit our environmental impacts.
- Prevent accidental situations (pollution, industrial accidents, safety incidents ...) as well as any quality distortion through continuous improvement.

- Aim to fulfil requirements of the SA8000 Social Accountability governing standard.
- Establish, maintain and review documented EQHSS objectives and targets at each relevant function and level within its organization. Those objectives and targets shall be consistent with the present policy, including the commitment to prevention of accident, pollution or any other gap.
- Comply with all present local legislations and regulations as well as Magotteaux International requirements, or all other requirements the company has subscribed to.
- Continuously satisfy our customer requirements in terms of quality, timing or services, while conducting our business operations with honesty and integrity.
- Improve the company's economic performance and ensure the profitability of invested Capital (ROCE).
- Continuously improve the company's products, process, and systems.
- Give personnel the necessary training to insure the evolution of competencies required for the Magotteaux Group's sustainable growth and performance.

Our Board of Directors supports this policy and will periodically review it.

Within this framework, our Board of Directors gives the necessary resources & authority to the ad-hoc management committees, as well as appropriate levels of hierarchy, to :

- Ensure that the necessary resources and process are provided for established, implemented and maintained Integrated Management Systems.
- Propose corrective & preventive actions and check on their efficiency.
- Ensure personnel awareness to safety, environment and quality requirements.

Sébastien Dossogne*

Chief Executive Officer

*as permanent representative of SEDIAM SPRL

Marc Babineau*

Chief Operations Officer

*as permanent representative of In Actum
International SPRL

Jean-Marc Xhenseval*

Strategic Partnerships, Public Affairs &
Secretary General

*as permanent representative of DOMARC SPRL

Fabrice Heughebaert*

Chief Financial Officer

*as permanent representative of CALEO SPRL

Annex 3 - Statement on conflict of interest (Section 6.1)

Considering that you have read and understood that established in the Magotteaux code of ethics, please complete the following statement bearing in mind that the information provided herein must be sufficient, reliable and appropriate.

In _____ (*localization*), on _____ (*date*),
 Mr/Mrs _____, as _____ (*title*)
 of _____ (*name of the company*), I declare not to be
 involved in any type of conflict of interest affecting the correct exercise of my role or,
 eventually, the social interest of the Magotteaux group.

Only if you consider that you are involved in any potential conflict of interest, please complete the following lines with the details of the corresponding information:

(*Signature*)

Annex 4 - Risk management policy (Section 6.14)

RISK MANAGEMENT POLICY (2017-2)

The Magotteaux group subscribes to the risk management policy implemented by Sigdo Koppers and described in the SK Corporate Governance Manual - 2013 (Annex 1) & in the SK Corporate Governance recommendations - 2016 (see Annex 2).

Consistent with the aforementioned policy, the Magotteaux group conducts the following actions in terms of organization & methodology:

1. ORGANIZATION

1.1. RISK COMMITTEE

- CEO
- Strategic partnerships, Public Affairs and Secretary General
- Legal Counsel

1.2. RISK ADMINISTRATIVE TEAM

- Strategic partnerships, Public Affairs and Secretary General
- 2 Legal Counsels

1.3. GENERAL MANAGERS TEAM

- General Manager EurAf - MEast
- General Manager - Asia & Oceania
- General Manager - North America

- General Manager – South America

2. DELIVERABLES (including persons in charge)

2.1. Risk matrix with top critical risks at group level ("*Matrix*")

Content: identification of major risks at group level - description - evaluation - mitigation plan - action plan

to be filled in by the **General Managers Team** in a standard template (provided by the SG&L Department ³) in coordination with the **Risk Administrative Team**.

2.2. Top 10 critical risks list at group level ("*Group List*")

Content: identification of top 10 major risks - description - mitigation plan - action plan - heat map

to be identified by the **General Managers Team** in a standard template (provided by the SG&L Department) thanks to the Matrix and in cooperation with the **Risk Administrative Team**. The **Risk Administrative Team** will provide the Group List to the Operations Committee ("**OPCOM**") for approval.

2.3. 4 special reports at group level drafted by senior managers ("*Special Reports*")

Content: Report on the themes outlined below, based on a standard template (provided by the SG&L department) and to be submitted to the **OPCOM** for approval:

1) Finance – CFO

Content: fund availability or access - exchange rate - receivables/ payables - tax - transfer pricing

2) IT systems – CFO & CIO

Content: IT structure - IT security (as cyber-crime, hacking, ...) - licensing /

³ SG&L Department means the Secretary General & Legal Department

software - hardware (servers, computers, smartphones)

3) Environment - Group Lean & EHS Manager

Content: environmental liability - permits / licences

4) Human resources - Strategic Partnerships, Public Affairs and Secretary General

Content: People/ talents/ competencies availability, Worker morale and social unrest

2.4. Group List & Special Reports

to be submitted to the **Risk Committee** for approval and then sent to Sigdo Koppers (Alejandro Reyes - *Gerente Contralor Corporativo*) by the SG&L department.

3. ANNUAL STANDARD CALENDAR

3.1. Quarterly: Matrix

Matrix to be submitted by the General Manager Team to the Risk Administrative Team

3.2. Quarterly: Group List

Based on the Matrix, the General Managers Team draw up the Group List in coordination with the Risk Administrative Team

3.3. Quarterly: 4 Special Reports

4 special reports to be submitted by the appointed senior managers to the Risk Administrative Team for information

3.4. Quarterly: Group List & Special Reports

- Step 1: OPCOM (full attendance) approval
- Step 2: Risk Committee approval

- Step 3: Notification of the Group List & Special Reports to SK by the SG&L Department

Jean-Marc Xhenseval *
August 21, 2017

* as Permanent representative of DOMARC sprl