

# Code of Conduct

## I. WHAT IS THE CODE OF CONDUCT?

### **THE CODE OF CONDUCT**

- Sets out the values guiding the Company's conduct.
- States business principles and commitments to our different stakeholders.
- Defines our expectations towards employees in their day-to-day decision-making and in their relationships with other stakeholders.
- Provides guidance in case of questions or concerns.

### **INTENDED USERS**

The Code of Conduct is a common reference document for all our managers and employees as well as for all our different stakeholders: customers, suppliers and contractors, local communities, business partners and shareholders.

### **MANAGERS HAVE SPECIFIC RESPONSIBILITIES**

- They are expected to refer to the Code of Conduct with their team members and make sure they understand it.
- They are responsible for creating a speak-up climate that will enable employees to discuss any issues.
- They must ensure that our business principles are implemented and respected.
- They must behave in an exemplary way that embodies our values.

**All employees** must understand, respect, and comply with the business principles contained in our Code of Conduct.

Suppliers, contractors and business partners are expected to apply standards that are equivalent to ours, in particular towards their employees.

## II. OUR BUSINESS PRINCIPLES

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We respect all applicable national and international laws and norms.

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As a responsible industrial company, we are committed to supporting efficient and properly managed use of our products.

We take into account the needs of today's consumers and the interests of future generations. We have an active policy of environmental stewardship that is an integral part of our sustainable development strategy and we provide regular and transparent reports.

Where there is a difference between a legal requirement and our Code of Conduct, we seek to apply the higher standard.

We engage with non-governmental organizations in matters related to our operations and we are responsive to concerns expressed by them.

The following business principles are a reference point and go hand-in-hand with our goals of continued growth, benefiting shareholders, customers and employees while contributing to the economic and social development where we operate.

### **PRIORITY PRINCIPLES**

IN LINE WITH APPLICABLE LAWS AND COMPANY RULES, ANY BREACH OF THESE BUSINESS PRINCIPLES CAN LEAD TO INTERNAL AND/OR LEGAL SANCTIONS.

- The Company seeks to ensure the highest compliance, ethical, safety, health, security and environmental standards wherever we operate.
- The Company has a rigorous compliance program based on a “zero tolerance” principle designed to prevent and detect violations of applicable anti-trust, anti-fraud, anti-bribery, and anti-corruption laws.
- The Company has rigorous rules against any type of inhuman behavior, discrimination and harassment. We are committed to treat all our stakeholders with respect and responsibility.

### III. OUR EMPLOYEES

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We pay particular attention to employees' working conditions, especially the respect for each individual.

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We have confidence in the loyalty, motivation, competence, respect and sense of responsibility of our managers and employees.

We believe our development depends on trust and respect between the Company and employees and amongst employees themselves.

All our staff must bring our values to life through our cornerstone behaviors: listening, mutual support, cross-functionality, and boldness.

Employees must ensure that they carry out their daily activities in compliance with the Code of Conduct.

### The Company's Commitments to its Employees

1. All employees have an annual appraisal during which objectives are set, performance and the respect of the Code of Conduct are assessed and career development, facilitated by appropriate training, is discussed.
2. We pay particular attention to employees' working conditions, especially the respect for each individual, the absence of discrimination, freedom of association and collective bargaining, as well as the protection of their health and safety. No form of harassment is tolerated.
3. We include our employees in our development by initiating and facilitating the distribution of relevant information, by consultation and by engaging in ongoing dialogue.
4. We respect the private lives and more specifically the personal data of all employees and other stake-holders.
5. We recruit personnel solely on the basis of our requirements and the specific capabilities of individual applicants.
6. Diversity is a decisive factor for our competitiveness, attractiveness and ability to innovate and adapt. We develop our employees' professional skills and careers without any discrimination, whether based on origin, gender, age, disability, sexual orientation, gender identity or affiliation with a political, religious, union organization or minority group.

# The Company's Expectations

## EMPLOYEES MUST ENSURE THAT THEY CARRY OUT THEIR DAILY ACTIVITIES IN COMPLIANCE WITH THE CODE OF CONDUCT

1. **HUMAN RIGHTS:** Employees' vigilance and personal involvement regarding human rights in daily activities are essential.
2. **SAFETY, HEALTH, SECURITY, SOCIAL AND ENVIRONMENTAL STANDARDS:** Employees must be conscious in their daily activities of their personal responsibility, giving due consideration to the prevention of accidents, harm to health, environmental damage or adverse impacts on local communities. Employees are expected to understand internal standards as well as the impact of our operations and improved risk management.
3. **REJECTION OF CORRUPTION, INCLUDING FACILITATION PAYMENTS, FRAUD AND ANTICOMPETITIVE PRACTICES:** The Company has a zero tolerance approach on these topics and adheres to the highest standards of integrity. Employees must build sound relationships with all stakeholders and prevent, identify and address situations that might cross the line.
4. **DECLARATION OF CONFLICTS OF INTEREST:** Employees are expected to disclose conflicts of interest. Identifying and reporting existing or potential conflicts of interest allows risk to be managed. Employees can minimize potential conflicts of interest by avoiding acquiring any interest or investing in the business of a competitor, supplier or customer (excluding the acquisition of shares on a recognized market) without their manager's prior written approval.
5. **RESPECT OF CONFIDENTIALITY, INTELLECTUAL & INDUSTRIAL PROPERTY, LAWS, AND COMPANY CONTRACTS:** Employees may not disclose confidential information, whether verbally, in writing or electronically. They must also observe the rules governing intellectual and industrial property, laws and relevant parts of contracts to which the Company is a party. This obligation remains even after an employee leaves the Company.
6. **AVOIDANCE OF INSIDER TRADING:** Insider trading is a stock market offense concerning the use of privileged information, not yet made public, to buy or sell shares or other securities. Employees are expected to contact the legal department in case of doubt regarding actions that could be considered insider trading.
7. **USE OF IT COMMUNICATIONS:** IT and communication resources are intended for professional use. Reasonable personal use may be tolerated in line with applicable legislation and internal rules.

8. **INVOLVEMENT IN POLITICAL ACTIVITIES:** We recognize our employees' rights to take part in political activities. In that case, we expect our employees:
- a. To clearly indicate that they do not represent the Company.
  - b. To timely inform their manager if their political activities might create a conflict of interest.

## IV. OTHER STAKEHOLDERS

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The Code of Conduct explains our commitments and expectations towards our stakeholders who are key to our long-term success.

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### **CUSTOMERS**

The Company provides customers with quality products and services, and strives at all times to offer them good performance at competitive prices for their particular requirements.

We are attentive to our customers' needs. We continuously monitor, assess and improve our products, services, technology and procedures to deliver quality, safety, energy efficiency and innovation at every stage of development, production and distribution process.

### **SUPPLIERS AND CONTRACTORS**

The Company's policy regarding suppliers and contractors is to respect each party's interest with transparent and fairly negotiated contract terms. It is built on three pillars: dialogue, professionalism and respect of commitments.

We expect our suppliers:

- To adhere to principles equivalent to those in our Code of Conduct.
- To make sure that their own suppliers and subcontractors respect equivalent principles to ours.
- To pay particular attention to their human rights standards and procedures, including their employees' working conditions.

### **LOCAL COMMUNITIES**

The Company undertakes operations that have social and environmental impacts at the local level and consults with communities regularly.

Through our operations, we contribute to social and economic development.

We pay particular attention to development opportunities for local communities.

We respect the rights of communities by identifying, preventing and mitigating impacts in particular on their environment and way of life and, where appropriate, by providing remedies. We seek to establish dialogue and lasting relationships with these communities at a very early stage.

## **INVESTORS**

We strive to earn the confidence of our investors, with the objective of providing them with a profitable and sustainable investment.

We regularly provide full and transparent information. We maintain an ongoing and constructive dialogue through various communication channels. We are attentive to their expectations, concerns and questions on any subject.

## V. SPEAKING UP

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We encourage a culture of openness where you can raise concerns and views concerning our Code of Conduct, confident that you will be supported by management.

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We are all responsible for ensuring that the Code of Conduct is applied. We understand that you may need advice in order to make sure you are compliant with the Code of Conduct.

If you need guidance on any topic related to the Code of Conduct, contacting your line manager is usually the best option. If you feel more comfortable, ask the local human resources department or other managers.

All members of management are committed to protect confidentiality and personal data. We will not tolerate retaliation against employees who raise concerns in good faith. External stakeholders can also contact the designated Compliance Officer or the General Manager for any questions on the implementation of our Code of Conduct.