



Code of Conduct Leman Group

Leman Group's purpose is to create impact by empowering everyone to make the most of energy and resources, reconciling progress and sustainability for all.

Leman Group is a responsible and committed company.

Our commitment is strong: we always deliver on the promises we make, and we act with full transparency. We express our values and share them, but above all, we give ourselves the concrete means to achieve our objectives. Our commitments translate into tangible actions.

We are fully aware of our **societal responsibility** and the path we wish to follow. We also know what we refuse: disregard for human rights, corruption and environmental degradation. In this spirit, **Leman Group must play a leading role in raising the standards of our sector in terms of sustainable development.**

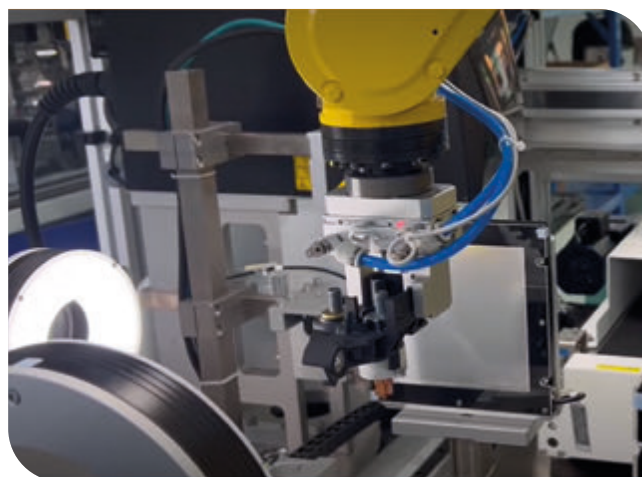
These commitments have been deliberately embedded in our **Code of Conduct**.

We commit to upholding this Code and bringing it to life in each of our actions. It applies to all those who work within Leman Group and its subsidiaries.

We are convinced that **trust, accountability and autonomy** are fundamental values that guide the way we work. Trust is earned and demonstrated through the actions of each individual, both individually and collectively. It serves as a compass in a complex environment, enabling fair and sound decisions to be made. We encourage every employee to **take full ownership of their responsibilities and exercise autonomy** in their decisions and actions, developing a culture where ethics and individual accountability go hand in hand.

Ethics is embodied by every team member, who reflects both their individual responsibility and that of the Group, thereby contributing to the trust and reputation of Leman Group.

Trust makes this autonomy possible and strengthens our relationships with our clients, partners, shareholders, employees and the communities with which we interact. In this light, we have developed this **Code of Conduct**,



which serves as our reference framework for ethics and responsible behaviour. It reflects our commitment to **ethics, safety, sustainable development, quality and cybersecurity**, and guides our responsible and respectful conduct across all our interactions.



Everyone is responsible for complying with applicable laws and regulations, implementing Leman Group's policies and upholding strong ethical principles. This **shared responsibility** is essential to sustaining trust within the organisation.

Because **trust comes with autonomy**, the Charter sets out clear principles – including what **"I can do"** and what **"I cannot do"** – along with references to associated policies and procedures, adapted where necessary to local legal requirements.

What to do in case of doubt or to report a situation?

We encourage everyone to exercise sound judgement and autonomy in their day-to-day activities. However, in the event of an ethical dilemma or uncertainty, support is available to assist with decision-making.

Our **Speak Up** alert system allows employees and external stakeholders to report any concern safely and confidentially. Each alert is thoroughly and fairly reviewed, with full respect for all those involved. Findings are then presented to the relevant governance bodies, which determine the appropriate course of action in accordance with our policies, particularly those relating to whistleblowers and case management.

In the event of a situation that is contrary to our principles or rules, everyone has a duty to act and to report it without delay. This is a responsibility shared by all.



Table of Contents

1. Respect for Laws and Fundamental Rights – Page 6

- Zero tolerance for child labour
- Zero tolerance for forced labour and all forms of exploitation
- Promoting decent work that respects fundamental rights

2. A Culture of Inclusion and Respect – Page 10

- Promoting equal opportunities and inclusion for all
- Valuing diversity and people with disabilities
- Combating all forms of discrimination
- Preventing moral and sexual harassment
- Encouraging social dialogue and freedom of collective expression

3. Acting for a Sustainable Future – Page 13

- Making health and safety an absolute priority
- Protecting the environment every day
- Actively contributing to sustainable development and decarbonisation
- Reducing our impact on nature and preserving resources
- Supporting local communities
- Participating in a responsible energy transition

4. Protecting Data and Securing the Digital Environment – Page 18

- Using IT tools responsibly
- Protecting everyone's personal data
- Ensuring the confidentiality of internal information
- Securing client, supplier and partner data
- Protecting our digital assets and intellectual property
- Adopting an ethical and responsible use of AI
- Making reliable decisions based on quality data

5. Growing Together – Page 22

- Developing the skills and talents of each individual
- Supporting professional career paths and mobility
- Fostering well-being and cross-generational cooperation
- Encouraging autonomy and accountability
- Supporting redeployment pathways when necessary

6. Acting with Integrity in Our Activities - Page 25

- Using company resources responsibly
- Preventing and managing conflicts of interest
- Saying no to corruption in all its forms
- Respecting fair competition
- Applying international compliance rules (export, sanctions)
- Working with responsible and committed suppliers
- Ensuring transparency and reliability in financial reporting
- Managing gifts, invitations and benefits
- Maintaining political neutrality
- Acting responsibly regarding prohibited substances
- Protecting the company's reputation

7. Adopting Exemplary Behaviour Every Day - Page 29

- Respect and kindness towards colleagues
- Respect for roles, responsibilities and the hierarchy
- Excellence in client relations
- Safety first, including wearing PPE
- Compliance with traffic and safety rules
- Respect for schedules and work organisation
- Honesty, transparency and exemplary conduct
- Respect for employees' rights and benefits
- Responsible use of employment arrangements

8. Bringing the Charter to Life Every Day - Page 33

- Making a personal commitment to uphold the Code
- Sharing and promoting the principles
- Being an active participant in the company's ethical culture
- Assuming individual and collective responsibility

9. A Responsible Supply Chain - Page 36

- Building responsible relationships with our suppliers
- Ensuring respect for human rights throughout the chain
- Reducing social and environmental impacts
- Combating conflict minerals
- Encouraging sustainable practices among our partners

10. Speak Up: Dare to Speak, Act and Drive Change - Page 39

- Encouraging everyone to report any concerning situation
- Ensuring confidentiality and protection of individuals
- Handling each alert with impartiality and seriousness
- Implementing the necessary corrective actions
- Making vigilance a shared responsibility

01.

Respect for Laws and Fundamental Rights



01. Respect for Laws and Fundamental Rights

Leman Group is committed to complying with all applicable labour laws and regulations in the countries where it operates, as well as the core standards of the International Labour Organization (ILO). It fully adheres to the universal principles of human rights as defined in the Universal Declaration of Human Rights, and ensures their application across all its activities and professional relationships.

The Group promotes a working environment built on **dignity, respect, equity** and **safety**. It is committed to ensuring decent working conditions for all its employees, particularly with regard to working hours, remuneration, health and safety, and to protecting its workers against all forms of abuse, exploitation or

inappropriate treatment. Leman Group applies a zero-tolerance policy towards child labour, forced labour, any form of modern slavery, servitude, human trafficking or exploitation.

Where a situation contrary to these principles is identified, the Group commits to implementing appropriate corrective measures, focused on the protection of victims, in accordance with international best practices and ILO recommendations.



Zero Tolerance for Child Labour

Leman Group strictly prohibits the use of child labour. A «child» is defined as any person who has not yet reached the minimum legal working age, or who is under 16 years of age, or who has not yet reached the age at which compulsory schooling ends, in accordance with the legislation applicable in the country concerned, whichever age is higher.

The Group implements rigorous age-verification mechanisms at the time of recruitment, such as the presentation of identity documents. The retention of original documents is strictly prohibited. The use of **apprenticeship programmes** in compliance with local legislation is encouraged, provided they guarantee the **protection of the rights, health** and **safety** of young workers. Workers under the age of 18 may not be assigned to tasks likely to harm their health, safety or development, including night work and overtime.



Leman Group also takes care to strictly oversee the placement of interns and students, ensuring compliance with educational agreements, applicable legislation and the protection of their rights.

Should a situation of child labour be identified, the Group commits to implementing appropriate **remediation measures**, including support for the child concerned and their family towards safe and sustainable solutions, in cooperation with specialist organisations.

Zero Tolerance for Forced Labour and All Forms of Exploitation

Leman Group prohibits all forms of forced, compulsory or involuntary labour, including modern slavery, debt bondage, coerced labour or any equivalent form of exploitation. No work may be demanded under threat, physical or psychological coercion, fraud or duress.

The Group also prohibits all forms of human trafficking, including the recruitment, transportation, housing or reception of persons for the purposes of exploitation. When a situation of forced labour is identified, the Group commits to immediately protecting the person concerned, putting an end to the abusive situation and cooperating with relevant organisations, including NGOs and local authorities, to support the rehabilitation and reintegration of victims.

Promoting Decent Work that Respects Fundamental Rights

Leman Group is committed to **promoting** fair, **equitable** and **sustainable** working conditions, and to maintaining **responsible** and **transparent** working relationships with its employees.

Every employment contract must be written in a language understood by the employee and must comply with local legislation. It must clearly set out the essential terms of employment, including: working hours and overtime limits, leave and weekly rest arrangements, notice conditions in the event of termination or substantial amendment of the contract, and the rights and obligations of both parties.



Working hours, including overtime, must not exceed the limits set by applicable legislation, collective agreements and international standards, except in duly justified exceptional circumstances, and must never exceed ILO standards.

Leman Group is committed to ensuring fair remuneration that complies with legal obligations, including minimum wage, overtime and mandatory social benefits. Each employee receives a clear, detailed payslip delivered in a timely manner.

The Group aims to ensure that its employees receive a level of remuneration that covers the essential needs of a decent standard of living, including food, housing, healthcare, education, transport and security. Where statutory minimums do not meet this objective, additional assessments are carried out by the Human Resources function, drawing on reliable and recognised sources.

The Group applies the **principle of equal pay** for work of equal value, without discrimination, in accordance with international conventions, particularly between women and men.

Finally, when using service providers or temporary employment agencies, Leman Group ensures contractually that these partners comply with equivalent standards in terms of human rights and working conditions.

Leman Group is a signatory to the United Nations Global Compact, which entails the implementation of an annual CSR roadmap in accordance with the following ten core principles:

- **Principle 1:** Support and respect the protection of internationally proclaimed human rights.
- **Principle 2:** Make sure that the company is not complicit in human rights abuses.
- **Principle 3:** Uphold the freedom of association and the effective recognition of the right to collective bargaining.
- **Principle 4:** Uphold the elimination of all forms of forced and compulsory labour.
- **Principle 5:** Uphold the effective abolition of child labour.
- **Principle 6:** Uphold the elimination of discrimination in respect of employment and occupation.
- **Principle 7:** Support a precautionary approach to environmental challenges.
- **Principle 8:** Undertake initiatives to promote greater environmental responsibility.
- **Principle 9:** Encourage the development and diffusion of environmentally friendly technologies.
- **Principle 10:** Work against corruption in all its forms, including extortion and bribery.



What I can do

- Verify the identity and age of employees before hiring
- Comply with and apply laws, internal procedures and human rights
- Report any suspicious or non-compliant situation
- Guarantee safe, fair and transparent working conditions
- Cooperate fully with audits, checks and relevant authorities



What I CANNOT do

- Employ a person without prior legal verification
- Resort to or tolerate any form of forced labour, child labour or exploitation
- Confiscate identity documents or restrict freedom of work
- Exceed legal working time limits or pay below the legal minimum
- Ignore, conceal or prevent the reporting of a non-compliance

02.

A Culture of Inclusion and Respect



02. A Culture of Inclusion and Respect

Promoting Equal Opportunities and Inclusion for All

Equal opportunities and inclusion for all means ensuring that every individual can access the same opportunities, regardless of their background, history or personal circumstances.

Decisions regarding recruitment, training and professional development must be based solely on skills and abilities. An inclusive working environment enables every person to feel respected, recognised and fully integrated.

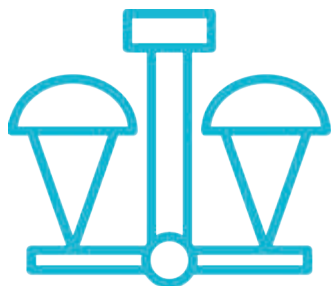
This approach fosters **team cohesion**, strengthens **collective performance** and supports the **development of each person's potential**.

Valuing Diversity and People with Disabilities

Recognising diversity and people with disabilities is based on the idea that individual differences are an asset to the organisation.

The integration and retention in employment of the individuals concerned require tailored workplace adjustments and appropriate support. Regular employee education fosters understanding, respect and cooperation.

This approach contributes to creating an **inclusive, equitable and high-performing working environment**.



Combating All Forms of Discrimination

All forms of discrimination must be prevented and prohibited, whether based on age, gender, origin, religion, disability or any other personal characteristic. Clear rules ensure fairness across all professional practices. Effective reporting mechanisms and appropriate sanctions ensure that problematic situations are addressed.

Training and raising awareness among teams play an essential role in establishing a lasting culture of respect and equality.

Preventing Moral and Sexual Harassment

A healthy working environment must be guaranteed so that no abusive, humiliating or inappropriate behaviour can be tolerated. **Raising employees' awareness** and **training managers** help to better identify at-risk situations and intervene quickly. Accessible, confidential and effective reporting mechanisms are indispensable for protecting victims and witnesses.

Every situation must be handled with seriousness and responsiveness to ensure the safety and respect of all.



Encouraging Social Dialogue and Freedom of Collective Expression

Regular, transparent and constructive exchanges between employees, their representatives and management serve to strengthen social dialogue.

Freedom of collective expression gives every employee the opportunity to share their ideas, concerns and proposals regarding their work and working conditions. Mutual listening, trust and the search for common solutions form the basis of this dialogue.

This approach improves **internal cohesion** and the quality of decisions made within the organisation.



What I can do

- Behave in a respectful, inclusive and fair manner towards every person in all circumstances.
- Contribute to a positive working environment by promoting listening, cooperation and dialogue.
- Treat all people fairly, without distinction based on origin, gender, disability or any other personal circumstance.
- Report any situation of discrimination, harassment or inappropriate behaviour that I witness.
- Actively participate in collective exchanges by expressing my ideas in a constructive and respectful manner.



What I CANNOT do

- Adopt or tolerate discriminatory, exclusionary or unfair behaviour towards a person or group.
- Participate in, encourage or turn a blind eye to situations of moral or sexual harassment.
- Refuse to interact with a person or treat them differently because of their personal characteristics.
- Prevent or limit others' freedom of expression in a respectful professional context.
- Undermine the climate of trust and respect necessary for effective collective functioning.

03.

Acting for a
Sustainable Future



03. Acting for a Sustainable Future

Making Health and Safety an Absolute Priority

All activities must be carried out in a **safe working environment**, free from accidents, for all employees. Risk prevention is based on the thorough identification of hazards and the deployment of appropriate measures to address them. Safety rules are applied consistently to reduce accidents and dangerous situations.

Leman Group ensures that its activities do not harm the health of employees, subcontractors, surrounding populations or users of its products. A dedicated health and safety organisation enables the Group to pursue a high level of excellence with the goal of zero accidents and zero occupational illness. Every workstation is designed and monitored to comply with applicable legal and regulatory requirements.

An environment conducive to physical, mental and social well-being is encouraged so that everyone can **thrive at work**. Regular training and safety awareness among teams reinforce a culture of safety and best practices every day. Before each task, a risk assessment is essential to adopt a systematic **»Safety First« approach**. Individual and collective responsibility is a central element of this approach.



Protecting the Environment Every Day

Integrating environmentally responsible practices is essential in all daily actions and decisions. Responsible waste management, including sorting and recycling, helps to **limit the impact of activities on the natural world**. Reducing water and energy consumption also contributes to preserving natural resources.

Particular attention is paid to **reducing pollutant emissions**, whether linked to industrial activities or to travel. **Respect for the environment** is at the heart of Leman Group's priorities, which acts to reduce the consumption of raw materials and optimise the use of natural resources.

Throughout the product lifecycle, efforts are made to limit discharges and improve environmental performance. The marketing of products presenting an unacceptable risk to health or the environment is excluded. Ongoing education among employees encourages the adoption of more responsible behaviours.



Actively Contributing to Sustainable Development and Decarbonisation

Transforming production and consumption methods is indispensable to meeting today's climate challenges. Reducing greenhouse gas emissions requires **continuous improvement in energy efficiency** and **optimisation of processes**.

Leman Group's efforts are directed towards reducing energy consumption and CO₂ emissions across all of its sites. The entire value chain is engaged to maximise the overall impact of the measures implemented. Research, design and execution activities are developed with a **sustainability-focused approach**.

The use of cleaner technologies and innovative solutions is a **key driver** for accelerating the transition. A long-term vision allows economic performance, social responsibility and environmental stewardship to be balanced.

Reducing Our Impact on Nature and Preserving Resources

Using natural resources more responsibly is essential to easing the pressure on ecosystems. Reducing waste and optimising raw materials contribute to more sustainable management.

The development of the circular economy, based on recycling, reuse and the extension of product lifespans, is a key approach. Protecting biodiversity and limiting air, water and soil pollution are also major priorities.

Such an approach sustainably reduces the environmental impact of activities while ensuring the availability of resources for future generations.

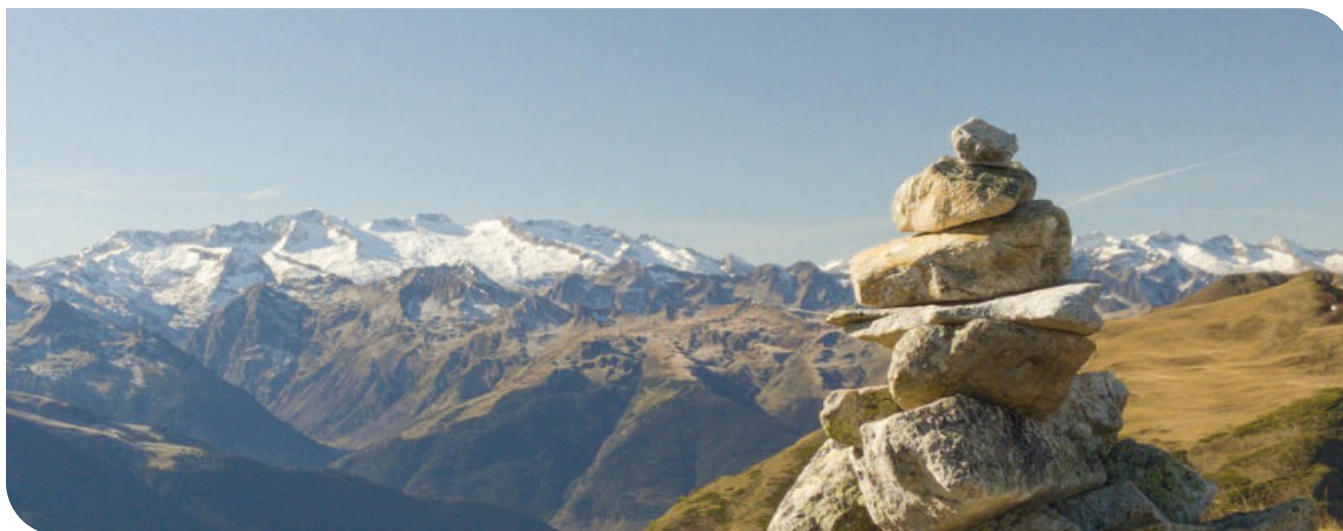


Supporting Local Communities

Economic and social development in local areas is supported through concrete actions in favour of local communities. The creation of local jobs and support for local businesses strengthen the territorial presence of activities.

Partnerships with local stakeholders help to **energise regions** and create positive synergies. Access to training, social inclusion and equal opportunities are also encouraged to strengthen local skills.

Involvement in local life builds lasting, balanced relationships between organisations and their environment.



Participating in a Responsible Energy Transition

The shift towards a more sustainable energy model is based on reducing dependence on fossil fuels. The development of renewable energies and improved energy efficiency are essential drivers of this transition.

Leman Group's objectives include **reducing its energy footprint** and **greenhouse gas emissions** across all of its activities. The supply chain is also brought into scope to amplify the results achieved.

Production and consumption patterns must be rethought to promote more environmentally friendly solutions. Innovation and investment in clean technologies contribute to building a more resilient and sustainable energy system.





What I can do

- Strictly comply with health and safety rules to prevent accidents and protect myself and others.
- Adopt environmentally responsible behaviours every day by reducing my consumption of energy, water and raw materials.
- Sort waste correctly and actively participate in recycling and environmental impact reduction initiatives.
- Act with respect, fairness and kindness towards all colleagues, without discrimination or exclusion.
- Report any at-risk situation, dangerous behaviour or breach of safety or ethical rules



What I CANNOT do

- Ignore or circumvent the safety rules established within the company.
- Engage in dangerous behaviour towards myself, my colleagues or the environment.
- Deliberately pollute or fail to comply with waste sorting and reduction guidelines.
- Make discriminatory, humiliating or disrespectful remarks or adopt such behaviour.
- Turn a blind eye to a situation of harassment, risk or non-compliance with internal rules.

04.

Protecting Data and Securing the Digital Environment



04. Protecting Data and Securing the Digital Environment

Data protection and digital security rely on the **responsible** and **supervised use** of the IT tools made available. These tools must be used solely in a professional context, in compliance with internal rules, software property rights and the procedures defined by the organisation. Any software installation must be approved to **guarantee the security of systems** and **compliance** with Group requirements.

The protection of personal data is also a priority, particularly with regard to information relating to employees, their private lives, their remuneration or their professional development. Access to this data is strictly limited to authorised persons in accordance with internal rules and the **GDPR**.

Internal, commercial, financial or technological information must remain strictly confidential, as must data relating to clients, suppliers and partners. Unauthorised disclosure is prohibited, even after the end of the employment contract, to protect the Group's interests and its intellectual property.

The use of digital tools also requires particular **vigilance** in relation to new technologies, especially artificial intelligence, which must be used in an ethical, responsible and secure manner. Finally, decisions must be made on the basis of reliable, accurate and protected data, to guarantee the quality and security of the information used.



Using IT Tools Responsibly

IT tools must be used exclusively in a professional context that complies with the organisation's internal rules. Each user is responsible for how they use the equipment and software made available to them. Software installations must be approved to guarantee system security and respect for publishers' intellectual property rights.

Responsible use helps to **prevent IT risks**, avoid malfunctions and **preserve** the integrity of the information system.

Protecting Everyone's Personal Data

The protection of personal data means **ensuring the confidentiality** of information relating to individuals' private lives. This concerns in particular data relating to employees, such as performance reviews, remuneration or career paths. Access to this information is strictly limited to authorised persons in accordance with internal rules and the **GDPR**. Compliance with these principles ensures the trust and security of those concerned.

Ensuring the Confidentiality of Internal Information

The company's internal information must be protected from any unauthorised disclosure, whether during or after the period of employment. This data includes commercial, financial, technical or strategic information. Its dissemination may only take place with the explicit authorisation of management. Confidentiality is an essential element in preserving the Group's competitiveness and security.

Securing Client, Supplier and Partner Data

The protection of client, supplier and partner data is essential to ensuring trust and the continuity of professional relationships. Information exchanged in the course of business activities must be handled with a **high level of security** and discretion. Any unauthorised use or disclosure is strictly prohibited. This requirement ensures compliance with contractual commitments and **protects the interests** of all stakeholders.

Protecting Our Digital Assets and Intellectual Property

Digital assets, such as IT systems, software, databases or developed technologies, must be protected against any abusive or unauthorised use.

Intellectual property is a key **strategic asset** that must be safeguarded in all circumstances. Any breach of these elements may have significant legal and economic consequences. The protection of these assets guarantees the **long-term viability** and competitiveness of the organisation.



Adopting an Ethical and Responsible Use of AI

The use of artificial intelligence must comply with **principles of ethics, transparency and security**. AI tools must be used in a controlled manner to avoid biases, errors or inappropriate uses.

It is essential to verify the results produced and maintain a critical eye towards the information generated. Responsible use unlocks the benefits of AI while **keeping its risks in check**.

Making Reliable Decisions Based on Quality Data

Professional decisions must be based on accurate, reliable and verified data to **ensure their relevance**. The use of quality data improves the performance, precision and consistency of the actions taken. It is important to check the reliability of sources and that information is kept up to date.

This approach **strengthens the reliability** and **soundness** of decision-making.



What I can do

- Use only professional IT tools in accordance with internal rules and the company charter.
- Protect personal data by respecting the confidentiality of employees', clients' and partners' information.
- Apply digital security guidelines to prevent any leakage or loss of sensitive data.
- Report any anomaly, security breach or suspicious use of IT systems.
- Use digital tools and AI responsibly, in compliance with ethical rules and internal procedures.



What I CANNOT do

- Install or use unauthorised software on company equipment.
- Access or share confidential data without prior authorisation.
- Share internal, commercial or technical information with unauthorised persons, even after leaving the company.
- Use the personal data of employees, clients or suppliers for non-professional or unauthorised purposes.
- Use artificial intelligence or digital tools in an uncontrolled manner or in breach of security and ethical rules.

05.

Growing Together



05. Growing Together

"Growing Together" is built on the continuous development of skills and the recognition of each person's talents within the organisation. This means supporting professional career paths and encouraging mobility so that every employee can develop in line with their aspirations and the needs of the company.

This collective dynamic also encourages **well-being at work** and **cross-generational cooperation**, considering the diversity of experiences as an asset. Autonomy and

accountability are actively promoted to strengthen engagement and trust. Where necessary, support and redeployment solutions are established to secure professional pathways.

The overall objective is to enable everyone to **progress** and **thrive** in a collaborative and evolving environment.

Developing the Skills and Talents of Each Individual

The development of skills and talents is built on the desire to enable every employee to advance in their professional journey. This is achieved through continuous training, the acquisition of new skills and the recognition of individual expertise.

The aim is to **strengthen collective expertise** while enabling each person to thrive in their role. By investing in skills, the organisation fosters both performance and personal growth.

Supporting Professional Career Paths and Mobility



Supporting professional career paths means helping employees develop within the organisation. This includes the possibility of changing role, department or function to acquire new skills. **Internal mobility** is encouraged to meet individual aspirations while adapting to the needs of the company. Regular check-ins help build coherent and evolving career paths.

Fostering Well-Being and Cross-Generational Cooperation

Well-being at work is based on a healthy, respectful and motivating environment for all employees. Cross-generational cooperation is encouraged to **promote the sharing of experiences**, knowledge and working methods. Age differences are regarded as an asset that contributes to complementarity within teams. This dynamic strengthens cohesion and improves the quality of collective work.

Encouraging Autonomy and Accountability

Employee autonomy is encouraged to drive **initiative** and confidence in the tasks assigned. Each person is expected to take ownership of their work, which fosters engagement and motivation. Taking decisions at one's own level contributes to improving the efficiency and responsiveness of teams. This approach is based on trust and respect for the objectives set.

Supporting Redeployment Pathways When Necessary

Support for redeployment pathways aims to assist employees facing role changes or periods of transition. Tailored support is provided to **ease the professional transition**. This may include training, retraining or internal mobility measures. The aim is to secure professional pathways while preserving everyone's employability



What I can do

- Develop my skills by actively participating in training and seeking to progress in my work.
- Engage in my professional career path by expressing my development or mobility needs.
- Share my knowledge and collaborate with colleagues, regardless of their age or experience.
- Exercise autonomy in my duties while respecting the objectives set and the organisation's rules.
- Embrace role changes or professional development opportunities while remaining open to the support mechanisms on offer.



What I CANNOT do

- Refuse any development opportunity without constructive justification.
- Obstruct or hinder cooperation between colleagues or between generations.
- Refuse to work collaboratively or to share knowledge that is useful to the team.
- Act irresponsibly by failing to fulfil the duties or objectives assigned to me.
- Disregard the support or training mechanisms offered as part of my professional development.

06.

Acting with
Integrity in our
activities



06. Acting with Integrity in Our Activities

Professional practices are built on **principles of ethics, transparency and accountability** that guarantee compliance in our activities and the trust of our stakeholders. The use of company resources must remain strictly professional to preserve assets and ensure rigorous and fair management.

The prevention of conflicts of interest is an essential element: decisions must be made objectively on the basis of criteria such as quality, performance and cost, without personal influence or favouritism. In the same spirit, all forms of corruption are strictly prohibited, whether offering or accepting undue advantages likely to influence a decision.

Respect for fair competition is required to guarantee commercial practices that are equitable, in line with market rules and applicable laws. International activities must also comply with applicable regulations, particularly regarding exports and sanctions.

Financial transparency demands reliable, complete accounting that accurately reflects

actual operations, with no falsified records or undeclared funds. The management of gifts and benefits helps to preserve the independence of professional decisions and avoid any form of undue influence.

The organisation's **political neutrality, compliance with rules** regarding prohibited substances and the **protection of the company's reputation** complete this set of requirements. The application of these principles contributes to establishing a culture of trust, accountability and exemplary conduct within the organisation.



Using Company Resources Responsibly

Company resources must be used solely in a professional context and in accordance with internal rules. Any use for personal purposes is strictly prohibited to **guarantee fair and secure management** of assets. Every employee must demonstrate responsibility in the use of the tools, services and property made available to them.

This rigour helps to preserve the organisation's resources and ensure their proper functioning.

Preventing and Managing Conflicts of Interest

Any situation in which a personal interest could influence a professional decision must be identified and declared. Choices, particularly in the selection of suppliers, must be based solely on **objective criteria** such as quality, performance and cost. Favouritism or personal relationships must never interfere with decisions. In case of doubt, it is essential to refer to management to **safeguard the integrity of decisions**.

Saying No to Corruption in All Its Forms

All forms of corruption, direct or indirect, are strictly prohibited, whether involving the payment or receipt of undue advantages. No bribe, gratuity or illegitimate benefit may be accepted or offered in the course of professional activities.

The Group also refuses any political financing and any use of professional relationships for the purposes of influence. This requirement guarantees **ethical** and **transparent practices**.

Respecting Fair Competition

Business must be conducted within a framework of free and fair competition, without any arrangement with competitors. It is prohibited to fix prices, share markets or exchange sensitive information.

Every commercial decision must strictly comply with competition law. This rule ensures the healthy and transparent functioning of the market.



Applying International Compliance Rules (Export, Sanctions)

International activities must comply with applicable regulations, particularly regarding exports and economic sanctions. Every transaction must be checked to avoid legal and financial risks. **Compliance with international law** helps to **secure exchanges** and **protect the company's reputation**.

Working with Responsible and Committed Suppliers

Relations with suppliers must be based on objective and transparent criteria. No personal benefit or preferential treatment may influence their selection. Partners must share values of ethics, compliance and responsibility. This requirement guarantees lasting and reliable commercial relationships.

Ensuring Transparency and Reliability in Financial Reporting

All financial transactions must be recorded accurately, completely and in accordance with accounting rules. No hidden funds or undeclared transactions may exist. Financial documents must faithfully reflect the reality of transactions. This transparency ensures the **reliability of information** and **legal compliance**.

Managing Gifts, Invitations and Benefits

Gifts or benefits offered or received must remain strictly symbolic and must never influence a professional decision. Significant gratuities are prohibited and must be declined or reported. Any attempt to exert influence through material or financial advantages is prohibited. This rule guarantees the independence of decisions.

Maintaining Political Neutrality

The company does not engage in any political financing and does not offer support to parties or candidates. Employees must also avoid any use of company resources for political purposes. This neutrality guarantees **the independence** and **impartiality of the organisation**.

Acting Responsibly Regarding Prohibited Substances

The consumption, possession or distribution of illegal substances, alcohol or drugs on company premises is strictly prohibited. These rules aim to guarantee the safety and well-being of all. Compliance with these principles contributes to maintaining a **healthy** and **safe working environment**.

Protecting the Company's Reputation

Every employee contributes to the image and credibility of the company through their behaviour and decisions. Any action contrary to ethics or internal rules may harm the collective reputation. It is therefore essential to adopt **exemplary** and **responsible** conduct in all circumstances.



What I can do

- Use company resources solely in a professional and responsible context.
- Make objective decisions based on professional criteria, free of conflicts of interest.
- Refuse all forms of corruption, bribery or undue advantage.
- Comply with fair competition rules and international regulations.
- Report any situation contrary to ethics, rules or internal procedures.



What I CANNOT do

- Use company resources for personal purposes.
- Accept or offer benefits, gifts or bribes that influence a decision.
- Participate in arrangements with competitors or breach competition rules.
- Disclose or falsify financial or accounting information.
- Use professional relationships for political or personal purposes.

07.

Adopting Exemplary Behaviour Every Day



07. Adopting Exemplary Behaviour Every Day

Professional conduct every day is based on respect, kindness and consideration towards all colleagues. Every interaction must contribute to creating a positive working atmosphere, built on listening, cooperation and courtesy. Respect for roles, responsibilities and the hierarchy ensures a clear, effective and consistent organisation in the fulfilment of tasks.

Excellence in client relations is also a key commitment, requiring a professional attitude, attentive listening and a tailored response to expressed needs. Client satisfaction and trust depend on the consistent quality of exchanges and services provided.

Safety remains an absolute priority in all situations,



particularly through strict compliance with guidelines and the mandatory wearing of personal protective equipment where necessary.

Compliance with traffic and safety rules also contributes to preventing accidents and protecting all individuals.

The smooth running of the organisation also depends on respect for schedules, internal procedures and work organisation. Honesty, transparency and exemplary conduct must guide every action to strengthen trust and credibility within the company.

Respect for employees' rights and benefits contributes to a fair and respectful working environment. Finally, the responsible use of

different employment arrangements ensures adaptive, ethical and sustainable human resources management.

Respect and Kindness Towards Colleagues

Exemplary conduct is based on professional relationships founded on respect, listening and kindness. Every employee must adopt an attitude that promotes a calm and cooperative working atmosphere. Recognising the value of each person helps to strengthen trust and cohesion within teams. Exchanges must remain constructive, respectful and free of any negative behaviour.

Respect for Roles, Responsibilities and the Hierarchy

The smooth functioning of the organisation depends on respect for tasks, responsibilities and the hierarchical structure. Every employee must act within the scope of their role and respect decisions made by their management. This clear organisation ensures better coordination of activities and avoids role conflicts. It also guarantees collective effectiveness in achieving objectives.



Excellence in Client Relations

Client relations must be managed with professionalism, rigour and a strong sense of service. Every interaction must aim to respond precisely and effectively to expressed needs.

Active listening and responsiveness are essential to ensuring client satisfaction and loyalty. An exemplary attitude directly contributes to the quality of the company's image.

Safety First, Including Wearing PPE

Safety is a permanent priority in all professional activities. Compliance with safety guidelines and the use of personal protective equipment are indispensable for preventing accidents. Every employee must adopt a vigilant and responsible attitude towards risks. This requirement aims to guarantee a safe working environment for all.



Compliance with Traffic and Safety Rules

Compliance with traffic and safety rules helps to minimise the risk of accidents during travel and on work sites. Each person must exercise vigilance and strictly apply the established rules. Compliance with these guidelines contributes to protecting individuals and maintaining a safe environment. Discipline in this area is essential to avoiding incidents.

Respect for Schedules and Work Organisation

Respect for schedules and work organisation guarantees the proper coordination of activities and the smooth functioning of teams. Every employee must be punctual and comply with the defined working hours. This rigour ensures continuity of services and fulfilment of the company's commitments. It also contributes to greater collective effectiveness.

Honesty, Transparency and Exemplary Conduct

Honesty and transparency are essential values for establishing a lasting climate of trust. Every employee must act with integrity in their decisions and behaviour. Exemplary conduct means applying the rules and values one expects of others. These principles strengthen the credibility and reputation of the organisation.

Respect for Employees' Rights and Benefits

Respect for employees' rights is indispensable for guaranteeing a fair and balanced working environment. Every employee must benefit from the conditions provided by internal rules and legislation. Recognition of rights and benefits contributes to motivation and well-being at work. It also helps to maintain a stable and respectful social climate.

Responsible Use of Employment Arrangements

The use of different employment arrangements must be carried out in an ethical manner and in compliance with regulations. Each situation must be handled responsibly to guarantee fair treatment for all those concerned.

This approach addresses the organisation's needs while respecting workers' rights. It contributes to sustainable and responsible human resources management.



What I can do

- Adopt respectful, kind and professional behaviour towards all colleagues and clients.
- Comply with safety rules, wear PPE and remain vigilant in the face of risks.
- Be punctual and respect schedules as well as work organisation.
- Follow the instructions of my management and respect everyone's roles within the organisation.
- Act with honesty, transparency and exemplary conduct in all my professional activities.



What I CANNOT do

- Adopt disrespectful, aggressive or discriminatory behaviour towards any person.
- Ignore safety rules or refuse to wear protective equipment.
- Fail to respect schedules, be absent without justification or disrupt work organisation.
- Challenge or fail to comply with hierarchical rules and internal procedures.
- Act dishonestly or lack transparency in my professional actions.

08.

Bringing the
Charter to Life
Every Day



08. Bringing the Charter to Life Every Day



The Charter must be integrated into all daily professional actions to guide behaviour and decisions. It serves as a shared reference for adopting an ethical, responsible attitude that is in line with the company's values. Its regular application reinforces the coherence and quality of practices within the organisation. Every work situation must therefore be an opportunity to put its principles into practice.

Making a Personal Commitment to Uphold the Code

Upholding the Code requires a strong individual commitment from each employee in their actions and professional choices. This means applying the established rules without exception and integrating them as an essential frame of reference.

This personal commitment helps to strengthen trust and the credibility of the organisation as a whole. It also ensures consistent and responsible conduct in all circumstances.

Sharing and Promoting the Principles

The dissemination of ethical principles relies on communication and exemplary conduct within teams. Every employee can contribute to raising awareness and understanding of the rules by applying and explaining them to those around them.

This approach fosters greater collective ownership of the company's values. It also helps to strengthen the shared culture and cohesion among members of the organisation.

Being an Active Participant in the Company's Ethical Culture

The company's ethical culture is built through the active involvement of each person in compliance with shared rules and values. Every behaviour contributes to strengthening or weakening this collective culture. Adopting a responsible, honest and respectful attitude sets an example and encourages best practices.

This collective dynamic promotes a healthy and consistent working environment.

Assuming Individual and Collective Responsibility

Every employee is responsible for their own actions and their impact on others and on the organisation. This responsibility means complying with the rules, but also acting proactively in the face of risky or non-compliant situations.

Collective responsibility rests on solidarity and the commitment of all to uphold the same principles. It guarantees the reliability, security and overall performance of the company.



What I can do

- Apply the Charter and the Code of Ethics in all my daily professional actions.
- Adopt exemplary behaviour that reflects the company's values and principles.
- Encourage my colleagues to comply with the rules and share best practices.
- Report any situation contrary to the rules or values of the Charter.
- Actively participate in the dissemination and understanding of ethical principles in my working environment.



What I CANNOT do

- Ignore or fail to apply the rules defined by the Charter and the Code of Conduct.
- Adopt behaviour contrary to the company's values or engage in unethical conduct.
- Remain silent in the face of a non-compliant or inappropriate situation.
- Prevent or discourage my colleagues from complying with the rules.
- Apply the Charter's principles selectively or opportunistically.

09.

A Responsible Supply Chain



09. A Responsible Supply Chain

A responsible supply chain is built on commercial relationships founded on ethics, transparency and compliance with applicable regulations. It requires the rigorous selection of suppliers to ensure reliable and lasting partnerships, based on social, environmental and performance criteria.

Respect for human rights is a fundamental principle at every stage of the supply chain, ensuring decent working conditions and excluding all forms of forced labour or child labour. Particular attention is also paid to the traceability of raw materials, especially to avoid the use of conflict minerals.

The reduction of social and environmental impacts is a central objective, achieved through the limitation of pollution, responsible resource management and the continuous improvement of practices. This approach also extends to partners, who are encouraged to adopt sustainable and responsible standards.

All of these commitments help build a supply chain that is safer, more transparent and more respectful of people and the environment.

Building Responsible Relationships with Our Suppliers

Relations with suppliers must be founded on transparency, equity and mutual respect. The selection of partners is based on objective criteria such as quality, performance and compliance with ethical and regulatory requirements. This approach establishes lasting and reliable partnerships. It also contributes to strengthening the trust and robustness of the supply chain.

Ensuring Respect for Human Rights Throughout the Chain

Respect for human rights is a fundamental requirement at every stage of the supply chain. This means ensuring that working conditions are decent, safe and in line with international standards. All forms of forced labour, child labour or exploitation are strictly prohibited. This vigilance is what keeps the value chain responsible and ethical.



Reducing Social and Environmental Impacts

Reducing social and environmental impacts relies on the continuous improvement of suppliers' and partners' practices. This means limiting pollution, resource consumption and emissions related to production and transport activities. Social aspects, such as working conditions and employee well-being, must also be taken into account.

This approach contributes to a more sustainable supply chain.

Combating Conflict Minerals

Combating conflict minerals aims to avoid the use of raw materials from areas where they finance armed conflicts or human rights violations. Rigorous traceability of supply sources is necessary to guarantee compliance. Suppliers must commit to complying with applicable regulations and international standards.

This requirement helps secure the supply chain and prevent ethical and legal risks.

Encouraging Sustainable Practices Among Our Partners

Encouraging sustainable practices means incentivising suppliers and partners to adopt responsible behaviour on social and environmental fronts. This is achieved through education, performance monitoring and the implementation of shared requirements. Partners are invited to reduce their environmental impact and improve their social practices.

This dynamic strengthens overall accountability throughout the value chain.



What I can do

- Select suppliers in accordance with ethical, social and environmental criteria.
- Verify partners' compliance with internal rules and international standards.
- Foster transparent and responsible relationships with suppliers.
- Report any suspicious or non-compliant practice in the supply chain.
- Encourage good sustainable practices among partners.



What I CANNOT do

- Work with suppliers who do not respect human rights or ethical standards.
- Ignore risks related to conflict minerals or illegal practices.
- Accept opaque or non-compliant commercial relationships.
- Tolerate abusive working conditions among partners.
- Circumvent supplier control or approval procedures.

10.

Speak Up: Dare
to Speak, Act and
Drive Change



10. Speak Up: Dare to Speak, Act and Drive Change

A culture of open and honest communication is encouraged so that every employee, as well as stakeholders such as suppliers or clients, can ask questions or report any situation contrary to the Code of Ethics.



Any concerning situation may be reported through the Speak Up system by sending a confidential email to the dedicated address, j.bizien@leman-industrie.com so that it can be processed in accordance with internal procedures. Findings are then submitted to the executive committee, which determines what action to take. In the event of a serious breach, immediate corrective measures are applied to guarantee compliance and security.

Everyone must feel free to raise a concern with confidence, in particular through accessible and anonymous alert mechanisms such as the «Speak Up» system.

Every report is handled rigorously, confidentially and impartially. The information gathered is analysed as part of thorough investigations aimed at protecting all those concerned and gaining a precise understanding of the situations reported.

The protection of individuals who make a report in good faith is an absolute priority. No form of retaliation, direct or indirect, is tolerated against an employee who has reported a concerning situation. Vigilance thereby becomes everyone's shared responsibility, ensuring an ethical, safe and transparent working environment.

Encouraging Everyone to Report Any Concerning Situation

Open and honest communication is encouraged so that everyone can report any situation contrary to the Code of Ethics. Employees and stakeholders may freely express their concerns or ask questions. The Speak Up system also allows reports to be made anonymously and securely.

Ensuring Confidentiality and Protection of Individuals

Each alert is handled in a strictly confidential framework to protect all those concerned. Information is processed with care to avoid any unauthorised disclosure. The protection of whistleblowers is an essential priority.



Handling Each Alert with Impartiality and Seriousness

Each report is subject to a thorough and objective investigation to guarantee fair treatment. Analyses are conducted without prejudgement and in respect of the facts. Findings are then submitted to management for a decision on next steps.

Implementing the Necessary Corrective Actions

When breaches are identified, appropriate measures are implemented promptly. The aim is to address at-risk situations and prevent their recurrence. In the event of a serious issue, immediate action is taken.

Making Vigilance a Shared Responsibility

Vigilance in the face of non-compliant behaviour is a collective responsibility. Every employee contributes to maintaining an ethical and secure working environment.

This approach strengthens trust and transparency within the organisation.



What I can do

- Report any concerning situation in good faith through the Speak Up channels.
- Ask questions or seek advice in case of doubt about an ethical situation.
- Participate in the prevention of non-compliant behaviour in my working environment.
- Cooperate in the context of an internal investigation by providing reliable information.
- Contribute to a climate of trust based on transparency and accountability.



What I CANNOT do

- Ignore a situation contrary to the Code of Ethics when I am aware of it.
- Reveal or disclose confidential information related to a report.
- Exert pressure or retaliate against a person who has made a report.
- Make false statements or use the Speak Up system abusively.
- Prevent or discourage a colleague from reporting a concerning situation.

