

# CODE OF ETHICS

## Electropoli



The Electropoli Group's performance and future are based on trust from customers, Group employees, its shareholders and private and public partners.

This trust is born in particular from adherence to the principles of conduct contained in the Electropoli Group's Code of Ethics, which I am pleased to present to you.

Through the provisions of this code, the Group undertakes to comply with the most demanding standards of business conduct. This code should be a factor in mobilising our organisation and improving our conduct. Its aim is to focus managers and employees even more strongly on our core, shared values.

Of course, nothing can replace common sense and the search for a personal ethic based on respect and responsibility. These are values that will certainly indicate to you the right attitude in action. However, in expressing the Group's commitment, this code will help employees define their behaviour in specific situations by referring to clear and precise principles.

All employees must be involved in complying with this code - it is a priority pathway to progress and excellence.

Nicolas Delaheguez  
CEO Electropoli Group

### INTRODUCTION

Electropoli is a professional provider of surface treatment services. The Group develops its activities by striving for a balance between economic sustainability, ethics and environmental protection. All our activities must be guided by high ethical standards, strong values and partnerships with employees, customers and suppliers.

In this context, the Group's Code of Ethics calls on every employee to respect professional ethics defined in the form of 'principles of action', which must in all circumstances and in all countries inspire employee behaviour. In particular, the Group requires all employees to act with the highest level of integrity and asks that transparency and honesty are key values for establishing credible and sustainable relationships with all parties involved.

These operating principles are not driven solely by moral considerations or the rules of law. They seek to promote honest and exemplary professional behaviour in all circumstances.

However, the objectives of the Code will only be achieved through reflection and a sense of responsibility on the part of everyone. The Code does not refer to, nor does it supplement, all laws and regulations, conventions or internal guidelines that govern the activities of the Group's companies and employees. Nor can it address all situations that employees may encounter in the course of their activities.

For situations that are not covered by laws, regulations or other external and internal standards, everyone's behaviour must be guided by the principles of respect, fairness and justice. It is the responsibility of each employee to analyse these situations in the light of these principles.

If this code proves incomplete or inaccurate in certain situations, if an employee feels uncertain about how to behave when faced with certain situations, we encourage them to consult their supervisors or HR managers or those responsible for sustainability or health and safety.

## COMPLIANCE WITH THE LAW

The Group and its employees comply with the laws and regulations in all countries in which they operate. Each employee avoids actions and behaviours that could involve him, other employees, the plant or the Group as a whole in a prohibited practice.

In particular, the Electropoli Group complies with restrictions on the export or re-export of goods, software and technology as well as restrictions in force in the field of trade and on specific countries, regions, companies or individuals.

Although everyone cannot be expected to be a specialist in the legislation applicable to their professional activities, every employee acquires sufficient knowledge of the legislation applicable to their activities, whether they are located in France, the Czech Republic, Poland or another country.

This minimum knowledge allows him to determine when it is necessary to seek advice from his superiors, HR managers or Group advisors.

It is absolutely essential that laws on corruption and fair competition are strictly adhered to. The same applies to labour, employment, health and safety and environmental issues, which require particular vigilance.

The Electropoli Group requires its suppliers and partners to adopt the same principles.

## RESPECT FOR OTHERS

### DIGNITY

Women and men have the right to have their dignity respected in their working environment. All employees comply strictly with this right.

In this context, the management of human resources, the involvement of the Group's employees, and the relations between employees are based on the principles of trust, mutual respect, with concern for treating everyone with dignity.

The Group has a fair and lawful human resources policy. It prohibits any (Appendix 1).

The Electropoli Group remunerates its employees fairly. Salaries must be paid regularly and they should be of an appropriate amount and in line with the national statutory minimum wage. Temporary work should comply with locally applicable laws and regulations.

Any kind of coercion, moral harassment or sexual harassment is prohibited.

**No member of the Board of Directors, no director or manager, and no employee of the Electropoli Group may exceed his or her powers by virtue of his or her position in the company or obtain personal benefit through his or her decisions, actions or inactions.**



## HEALTH, SAFETY

The Group complies with and implements labour laws, health and safety regulations and ensures that employees are always treated in accordance with applicable requirements.

The Group is committed to promoting the safest possible working conditions for the health and lives of its employees and to actively implementing measures to prevent safety risks in our daily work.

Due to its activities in the chemical industry, the Electropoli Group is committed to identifying and managing chemical products to ensure safety during their application, storage, use and recycling.

## EMPLOYMENT OPPORTUNITIES

Given the nature of its business and the need to use its expertise to provide the right level of service and technology, the Group makes the development of its employees a priority.

Therefore, the Group implements all measures to continuously improve the skills and abilities of its employees in order to achieve the highest level of qualification and customer satisfaction.

Recruitment, development and training processes meet these objectives and are conducted with equality, diversity and non-discrimination in mind.

The Electropoli Group encourages every employee to take an active part in his or her professional development and promotes equal opportunities in terms of professional development and mobility.

## FREEDOM OF EXPRESSION AND SOCIAL DIALOGUE

The Group builds relationships based on trust at all levels of the company, inviting its employees to freely express their opinions, particularly on improving their working environment.

Recognising the workers' right to free association, the Electropoli Group conducts dialogue and negotiations with workers' representatives.



The Group recognises the existence of trade unions and the right of employees to form a trade union of their choice and/or organise employee representation in accordance with applicable laws and regulations.

Electropoli rejects any occupational discrimination motivated by their role as crew representatives.

## PRIVACY

Everyone complies with employee privacy laws, particularly those relating to IT files.

For the Electropoli Group, respect for the right to privacy means that "no one should be subjected to arbitrary interference in the sphere of his or her private, domestic or family life or in his or her private correspondence, or to unlawful attacks on his or her honour or reputation. Every person has the right to the protection of the law against such interference or attacks" (according to the Universal Declaration of Human Rights).

## BASIC RIGHTS

The Group also requires compliance:

- the principles of the UN Universal Declaration of Human Rights
- the fundamental conventions of the International Labour Organisation
- principles set out in the United Nations Global Compact.

In this context, Electropoli Group adheres to international human and labour rights standards, considering them fundamental and universal.



In accordance with the eight fundamental conventions of the International Labour Organisation relating in particular to freedom of association, the prohibition of all forms of forced labour, the abolition of child labour, the prohibition of corporal punishment, mental or physical coercion and the prohibition of discrimination, the Group considers that the workplace is free from such practices.

## LOYALTY AND CONFLICT OF INTERESTS

In all circumstances, the conduct of employees is fair and dictated by the interests of the establishment for which they work and the interests of the Group. The image of the Group and the quality of its services or products are conditions for its growth and sustainability. In particular, everyone shall refrain from any act of discredit towards the Company or Group that employs them.

Group employees pay particular attention to the protection and profitability of the Group's investments.

Customer satisfaction is the Group's main objective. The trust of customers is earned and maintained by respecting their rights and taking constant care to make only those commitments that can be fulfilled.

Bearing in mind the duty of loyalty to the Group, employees ensure that they do not directly or indirectly carry out any activity or make any statement that would place them in a position of conflict of interest with the Company.



In particular, an employee does not seek to hold an interest or investment in a company, whether it is a customer, supplier or competitor of the Group, if this investment may affect his or her behaviour in the performance of his or her duties as an employee of the Group.

### Examples

- You may not conduct business or work for any company other than Electropoli that competes or intends to compete with Electropoli, and such business or employment must not interfere with your work for Electropoli
- You must avoid a situation where you, a close friend or a member of your family has a financial relationship with a company that does business with Electropoli or that otherwise influences Electropoli's business.
- Working with relatives or anyone with whom you have a personal relationship may create a conflict of interest. Do not allow an employee to be a supervisor of his or her immediate family members or family members directly to him or her - unless the situation has been reviewed and approved by the HR department. All other cases should be assessed in consultation with the HR department.

All employees should obtain the written authorisation of the director of their company before entering into a transaction with a company in which they or a member of their family is an investor or a person holding an important management position therein.

## COMMUNICATION AND TRANSFER OF INFORMATION

The Group's communication should be transparent and reliable. Its purpose is to enable the Group's partners and employees to obtain reliable information about the Group's activities.

In particular, the Group strives to provide its shareholders with reliable and high quality information.

In this respect, Electropoli publishes financial and non-financial information in accordance with applicable law and industry rules.

Good governance of the Group requires that everyone, regardless of their level of involvement, takes the utmost care to ensure the quality and accuracy of the information they provide within the Group.

An employee shall not disclose outside the Group confidential information that he or she has by virtue of his or her functions or that he or she acquires incidentally because of his or her membership in the Group. He or she shall also not communicate such confidential information to employees who are not authorised to do so. Particular attention is paid to information concerning results, forecasts and other financial data, acquisitions and divestments, new products, know-how or technology, commercial offers, as well as information concerning human resources. The duty of confidentiality applies even after an employee has left the company.

The prohibition of disclosure covers in particular certain information or communication activities: relations with the media, investors, public authorities and are reserved for certain managers, the finance directorate, the industrial strategy directorate, the commercial directorate, the operations directorate. All information, whether confidential or not, and communication activities cannot be disclosed or carried out by an employee who does not have such powers.

## PROTECTION OF ASSETS

Everyone must ensure the integrity of the Group's assets. This includes not only equipment, buildings or intangible assets identified and defined by law. It also includes ideas or know-how developed by Group employees. Also part of the Group's assets are customer and subcontractor or supplier databases, information on markets, technical or commercial practices, commercial offers and technical studies, any kind of data or information to which employees have access in the performance of their duties. These assets are subject to protection. This obligation continues even after an employee leaves the company.

No Group funds or assets are used for illegal purposes or purposes unrelated to the Group's business. Accordingly, equipment, materials, funds, services and company property in general are not used for personal purposes. No employee appropriates for his or her own use any Group property or makes it available to third parties for use by anyone other than the Group.

In particular, communication systems and intranets are the property of the Group and are used for professional purposes. Their use for personal purposes is only permitted if it is within reasonable limits, is justified by the need for a fair balance between private and professional life and is genuinely necessary. The use of these systems and networks for illegal purposes, in particular for sending defamatory, discriminatory, racist, sexually explicit or offensive messages, is prohibited.

It is also prohibited to make copies of the software used by the Group or to make unauthorised use of this software.

Any document or information subject to intellectual and industrial property or know-how developed directly or indirectly by the Group must be treated as confidential by the employee who has access to it and who must refrain from disclosing or using it in any way other than that permitted by the company.

## INTERNAL CONTROL

The promotion of ethics within the Group, the fight against corruption and compliance with competition law are important themes of the Group's internal control. Regular monitoring of the application of internal control principles related to ethics is carried out at each subsidiary and at Group level.

All business transactions are carried out with full transparency and are entered fairly in the company's financial reports and documents.

The financial management also verifies, on the occasion of systematic or special assignments, that the Group's activities are conducted in accordance with the principles of this Code of Ethics. All employees are required to cooperate with the members of the financial management with concern for transparency and integrity so that any shortcomings or weaknesses can be identified and corrected.

Any hindrance to the proper performance of these tasks, as well as the concealment of information in this context or the voluntary provision of false information, will constitute a serious breach of this Code of Ethics.

## QUALITY

Quality is a strategic concern for the Group.

Group companies are committed to treating their customers in a fair and equitable manner. They are convinced that customer satisfaction ensures the sustainability of the company. Employees and each of the Group Companies must foster quality relationships and ensure that the quality of products and services is continually improved, while taking care of health and safety when using the products offered.

The technologies and processes implemented take into account quality, safety, environmental, contractual and regulatory requirements.

Every employee participates in the continuous improvement of internal risk management systems and facilitates the identification of the root causes of irregularities.

## SUSTAINABLE DEVELOPMENT AND ENVIRONMENTAL PROTECTION

Sustainability must be integrated into the Group's business strategy. In line with its culture and values, the Group is committed to serving its customers while ensuring its social and environmental responsibility.

Applying the principle of continuous improvement and based on concrete actions, the Group's entities must include in their strategy and their processes the protection of the environment and natural resources, the improvement of living conditions, the sharing of experience and the use of the best technologies, dialogue and the participation of stakeholders in decisions that affect them.

The Group strives to achieve the highest environmental standards. Each employee strives to maintain a safe working environment, thereby protecting his or her health. It also strives to prevent or minimise the negative effects of its activities on the environment. Topics common to all Group employees are, in particular, the protection of nature, the preservation of biodiversity and ecosystems, the depletion of natural resources, and the management of waste and toxic substances.

**The Electropoli Group is committed to taking an active role in reducing CO<sub>2</sub> emissions and protecting the environment.**



## COMMERCIAL ACTIVITIES

Group companies treat all customers and suppliers in a fair and equitable manner, regardless of their size and conditions.

For the safety of our customers and our business partners, we do not make promises that we will not be able to keep.

The selection of Electropoli's suppliers or service providers must comply with the Group's internal procedures and be based on actual needs, quality, efficiency and cost. Favouritism based on friendship or family relations is prohibited.

In accordance with our purchasing procedures, contracts between the Group and service providers must clearly specify: the services to be provided, the tariff base or prices and all other general conditions. All payments must be made in relation to the services actually performed.

Group companies can only benefit from fair and open competition.

Employees are prohibited from offering or granting favours, favours or benefits, whether monetary or otherwise, to third parties. In particular, any promise to give or give gifts or to perform free services is prohibited.

Employees may not receive, directly or indirectly, any payment, gift, loan, entertainment or benefit from anyone involved in a business relationship with the Group, with the exception of low-value commercial items (maximum of EUR 100 per year from one partner). If there is any doubt as to whether such a gift or benefit is lawful, the question should be asked whether they are capable of affecting the employee's functioning within the Group and whether the person offering them may suspect that the recipient has thus entered into some arrangement. The employee's superiors should be informed of any solicitations or offers to which the employee is the recipient.

Entertainment of any kind is only permitted if there is a legitimate business reason and is in accordance with applicable law and the principles of this Code of Ethics. Entertainment expenses must be kept within reasonable limits and managed in accordance with applicable laws and internal regulations.

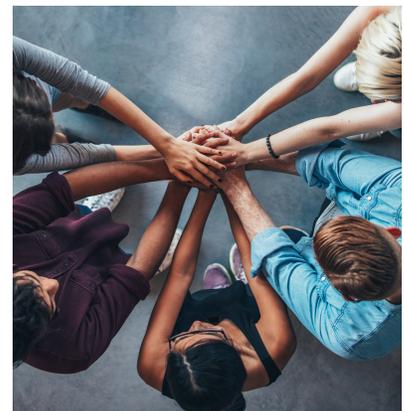
The use of company representation funds for private purposes is prohibited.

## PARTICIPATION IN CHARITABLE AND COMMUNITY ACTIVITIES

Charitable and community contributions are allowed and the Group, since its inception, has been heavily involved in community activities, i.e. in:

- promoting and supporting sport and benefits that encourage employees and their families to lead active lifestyles,
- supporting local social life,
- participation in charitable activities for the benefit of those most in need.

These are subject to the prior written approval of the facility director and are duly recorded.



## CORRUPTION

Corruption is contrary to the Group's values and its ethical principles. Under no circumstances may the negotiation and execution of contracts give rise to conduct or acts of active or passive corruption towards or by public or private entities, or complicity in bribery or favouritism.

In order to be able to fight corruption, the Group has defined a special procedure. Documents relating to commercial or financial transactions must faithfully reflect those transactions. No payment may be authorised or made with the intention or understanding that all or part of such payment is to be used for any purpose other than that described in the documents supporting such payment. No false or artificial entries must be made in the books and records of Electropoli or its subsidiaries for whatever reason.

## SIGNALLING VIOLATIONS OF THE RULES

When an employee is confronted with an ethical problem, he or she should inform his or her supervisor or the person authorised to support him or her in this regard, in time for the appropriate advice or decision to be taken. It is the responsibility of the supervisor and managers of the company to assist employees in solving problems they may encounter. When in doubt, the Human Resources Department should be consulted on the topic. No sanctions may be applied to an employee who in good faith reports a breach of this Code.

In order to maintain the confidentiality of individuals, a professional alarm system is made available to employees who wish to do so in order to collect information on violations of the code of ethics. The system, managed by independent company WHISTLEBLOWER, is designed to collect confidential information from whistleblowers.

The system is accessible via the following internet link:

<https://whistleblowersoftware.com/secure/Electropoli>

### **Activation of Group Alert**

The use of the Whistleblower system is optional. The Alert may only be triggered in accordance with applicable laws and regulations and in exceptional cases where warning systems established by law or control systems within the Group or the plant in question may not work. The resignation of an employee from the use of the alert system does not entail any consequences for the employee.

The whistleblower provides his or her details or can stay anonymous. His or her identity shall be treated as strictly confidential.

Misuse of the system exposes its author to disciplinary sanctions as well as to legal proceedings. Conversely, using the device in good faith, even if the facts are later found to be untrue or not the basis for any action, will not expose the author of the report to any disciplinary sanctions.

### **Content of the Group's professional alert**

Only facts, data and information formulated in an objective manner directly related to the areas covered by the scheme are taken into account.

In each communication, the so-called Case Manager (i.e. the person dealing with the case) highlights the alleged nature of the facts, information or data and any caveats necessary to describe them.

### **Follow-up to the Group's alert**

After investigating the report, the case manager informs the parties concerned. They carry out the relevant investigations and decide on further actions in case of observed violations, such as disciplinary sanctions or referral to administrative or judicial authorities.

Any data provided as part of the implementation of the alert system and not falling within the areas defined above will be deleted by the Case manager, unless the vital interests of the

Company or the physical or moral integrity of its employees are at risk. In the latter case, he/she may decide to notify his/her superiors and/or the relevant authorities.

**Electropoli respects diversity among employees and ensures that all employees have equal opportunities for development.**

Throughout the working lives of its employees, Electropoli refrains from applying the 18 discrimination criteria prohibited by the ILO and the EU:

- Age
- Political views
- Gender
- Customs
- Health status
- Belonging to a race
- Trade union activities
- Name
- Sexual orientation
- Actual or assumed origin
- Appearance
- Belonging to an ethnic group
- Religious beliefs
- Marital status
- Disability
- Genetic traits
- Pregnancy
- Nationality

This prohibition applies to all stages of employees' working life: employment, remuneration or career development and is mentioned in the internal regulations.

The Group attaches particular importance to women being treated equally to men at work.

Electropoli promotes teamwork free of prejudice and draws its strength from the values derived from the diversity of its employees. In return, the group is committed to providing its employees with fair and regular remuneration, development opportunities, stimulating challenges and very good working conditions.

## Code of ethics: what to remember

In this code of ethics, Electropoli reaffirms the core values it intends to respect, taking into account its responsibilities towards its customers, employees, shareholders, private and public partners, and more generally towards society.

Electropoli expects all Group employees to adhere to the following core values in their working lives:

1. strict application of laws, regulations and internal standards, in particular as regards health, safety and environmental protection;
2. respect for workers, in particular by respecting the Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organisation;
3. honesty, fairness and transparency towards customers, shareholders and partners;
4. honesty and integrity of internal controls, accounts and financial information;
5. respecting the principles of free competition and rejecting corruption in all its forms, in particular those prohibited by the OECD;
6. loyalty to the company, in particular by avoiding conflicts of interest, breaches of confidentiality;
7. protection of the Group's assets, in particular by prohibiting the misappropriation of any of them;
8. constant care about quality and sustainability.

