



# GUIDE TO GOOD CONDUCT



#OpenMind

WE BELIEVE IN CURIOSITY



#Agility

WE DO AGILE MANAGEMENT



WE TRANSMIT A CONSTRUCTIVE KNOW-HOW

#Exemplarity





WE LOVE NATURE

#Environmental  
sensitivity



NONE OF US KNOW  
WHAT WE KNOW ALL TOGETHER

#TeamSpirit



WE ARE NOT AFRAID TO GET WET

#Implication

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**E**coslops expects the actions of all its employees, including the management team, to reflect its ambition for integrity, fairness and respect in all countries where the group operates.

Our **Guide to Good Conduct** illustrates the values of our company and sets out the fundamental principles to be respected in our daily interactions. This document is an essential reference designed to help each of us to take the right decisions at the right time in a professional environment that is increasingly complex. It is available and accessible to all, as are all our policies, on the AllShare partition of our server and on our website, and is revised regularly.

Compliance with the rules on ethics and integrity is crucial. It must guide us day after day in our professional relationships, the services provided to our customers and, more generally, in our relationships with all of our partners.

We count on your commitment to embody the key values and culture of our company.

If you have questions, do not hesitate to ask your manager or the compliance director, Vincent Feÿs (notably via the email address [compliance@ecoslops.com](mailto:compliance@ecoslops.com)). These interlocutors are at your disposal if you need them.

This update includes various additions, particularly in the area of equal opportunities.

Enjoy your reading,

Vincent Favier  
Chairman and Chief Executive Officer of Ecoslops SA

# INTRODUCTION

Ecoslops exercises its activities in accordance with the highest standards of ethical conduct, leadership and corporate social responsibility and it expects all of its employees to be fully informed of these standards. The present Guide to Good Conduct (the «Guide») is intended to support all employees and senior managers of Ecoslops, including all of its subsidiaries (together, the «Company»), and all members of the Board of Directors of the Company. All of the employees, senior managers and directors of the Company should be guided by the principles laid down in the present Guide.

No code or policy can provide for any situation or provide definitive answers to all questions likely to be raised. Consequently, the present Guide is intended to highlight the areas where there are ethical risks, to provide advice on identifying ethical questions and on answering them and to put in place mechanisms for reporting any unethical behaviour.

You are invited to ask questions if you have any doubt about the best behaviour to adopt and to report any apparent breach of the ethical standards of the company that you are aware of. Unless specifically indicated in the Guide, your questions and concerns should be sent to the interlocutors shown in the section entitled «Questions; reporting concerns or breaches» below.



# FAIRNESS IN THE WORKPLACE

The Company sets out to maintain a place of work without discrimination, harassment or violence. Any behaviour of this kind in the workplace, whatever its form, will not be tolerated. If you consider that you have been a victim of such behaviour, this incident must be reported as soon as possible (see the chapter «Questions; reporting concerns or breaches»). In order to avoid any form of discrimination in case of specific circumstances, the Company may facilitate adaptation of working conditions (adaptation of hours, telecommuting, etc.).

## Non-Discrimination and Equal Opportunities

The Company promotes equal opportunity in matters of employment. Its recruitment decisions are based solely on criteria related to the job, without consideration of race, colour, age, religion, national origin, medical condition, disability, family situation, sex, sexual orientation or any other consideration prohibited by the applicable law. This policy covers all aspects of the employment relationship.

The Company specifically addresses gender diversity regarding recruitment and ensures that, when possible, candidates from both sexes are selected for the remaining of the hiring process. It also promotes the professional development of women within the company and generally promotes skills development for all.



## Harassment

The Company will not tolerate any form of harassment. Harassment may take numerous forms, notably any repeated behaviour which has the purpose or effect of creating an intimidating, hostile or offensive working environment or harms the performance of a person at work or his/her health. The following behaviours are examples of harassment: the use of pejorative nicknames or insults, negative stereotypes, any threatening or intimidating behaviour; any verbal or physical behaviour that is degrading towards a person or expresses hostility or hatred towards him/her.

The display or distribution of written or graphical documents that ridicule or express hostility or loathing towards a person or a group also constitutes a form of harassment. Concerning sexual harassment, it can take different forms, notably verbal or physical harassment or even violence.

The Company rules out any act or behaviour that is violent, intimidating or threatening against an employee, senior manager or member of the board, a service-provider, a temporary worker, a guest, a visitor any other person participating in the activities of the Company.

If the Company becomes aware of any threat against one or more employees, it will attempt, if it deems prudent or necessary, to inform the targeted individuals about this and contact the competent authorities.





## Nepotism

The Company rules out nepotism. Nepotism consists of favouring a relative, a partner or spouse due to the relationship that is maintained. Relations, partners and spouses will not be treated differently from other applicants for a position. However, the process in employment matters requires a more rigorous examination each time an employee may be involved in a work-related decision concerning a relative, a partner or a spouse. A person cannot be designated or remain in a position if they exercise powers involving supervision, designation, promotion or settlement of work-related disputes with regard to a relative, a spouse, a partner or a person with whom he/she has an intimate relationship or, more generally if this situation creates a conflict of interest.

## HEALTH AND SAFETY

The Company is intent on providing safe and healthy premises for its employees, its customers and the public. Safety is an essential value which is considered in everything that we do. The Company therefore exercises its activities while respecting, as a minimum, the laws, regulations, the Health, Safety, Environment and Quality (HSEQ) policy and the Golden Rules of the Company, and it endeavours to constantly improve our overall performance and culture in matters of health and safety.

The company is also committed to establish a healthy and fair work/life balance taking into account the different needs of men, women, parents and caregivers. The balance includes the right to disconnect which is a principle where employees are entitled to not be connected to professional digital tools outside working hours (see our home-office charter). This principle applies to both full-time and part-time workers.

The company premises are non-smoking areas, except for those areas designated and marked as such. Furthermore, the consumption of drugs and alcohol is not tolerated in the workplace during working hours. The relevant legal and regulatory provisions apply fully.

**«Man and his safety must be the first concern in any technological adventure.»**

*Albert Einstein*



# BUSINESS OPPORTUNITIES THAT BECOME AVAILABLE TO THE COMPANY AND CONFLICTS

The interests of the Company relative to business opportunities prevail over our personal interests. Any relevant business opportunity which becomes available to the Company is notified to it and the decisions arising from it are taken in the best interest of the Company in the light of what follows.

If you do not know, with certainty, whether a potential investment may be problematic, do not invest before having consulted the Compliance Director.

We take our business decisions according to what is in the best interest of the Company, and not according to personal relationships or considerations or with the aim of seeking personal profit. A situation of conflict of interest occurs when your personal interests interfere – or even appear to interfere – with your ability to take objective business decisions. Conflicts of interest are not simple. Their influences are often subtle and even the appearance of a conflict may have a harmful effect on the reputation of the Company, whether the conflict is real or not.

The prior, written authorisation of the Compliance Director is necessary before any equity investment in:

- a joint venture, a partnership or any other commercial agreement with the Company; or
- a decision by the Company to do business with a third-party company in which you, your partner or your spouse, a member of your family or a friend has a significant equity investment, or to do business directly with one of these persons.

Any conflict or potential conflict of interest is reported to the Compliance Director, so that he/she can examine it and authorise it, where applicable. Special rules apply to senior managers and members of the board whose conduct creates a real, apparent or potential conflict of interest. Before adopting any such behaviour, the senior managers and members of the board must fully disclose all facts and circumstances to the board of directors and obtain its authorisation.

A conflict of interest may occur in various circumstances. For example, accepting a personal benefit which could be interpreted as having been given to you due to your situation within the Company, or accepting a gift from a supplier or service provider while you are negotiating the renewal of a contract with them.



## PROFESSIONAL INVITATIONS AND GIFTS

Building business relationships is important and precious. Professional exchanges, notably professional invitations, can create value or provide an occasion to improve knowledge of the sector and of products. This can also create a conflict of interest. You, your family and the members of your family must never accept gifts, invitations or personal benefits that may affect, or be perceived as affecting, your business judgement or your decisions. You must never solicit gifts, invitations or other expressions of commercial courtesy after a business contact. Offering or receiving a sum of money or a gift in the form of a bribe, a gratuity or an unlawful payment is legally reprehensible.

It is important to be attentive to the policies of other companies and not to give gifts or invitations which breach the policy of another company. Also keep in mind that what is acceptable in a commercial environment may be completely unacceptable in relationships with the public authorities.

Strict laws govern the giving of gifts, notably meals, invitations, transport and accommodation, to public officials and civil servants. It is prohibited to offer gifts or anything of value to public officials and civil servants or members of their families in the context of the activities of the Company, without having first obtained the written authorisation of the Compliance Director.

For more information, please see the section «Expressions of commercial courtesy» in the Company policy on the fight against corruption.



# COMPLIANCE WITH THE APPLICABLE LAWS AND REGULATIONS

The Company endeavours to comply scrupulously with the letter and the spirit of all laws, rules and regulations applicable to its activities. Furthermore, it expects its employees to behave honestly with all customers, suppliers and service providers and with the regulation and competition authorities.

## Commercial, tax, employment, etc., regulations.

Regulatory requirements have a considerable impact on how the Company conducts its business. The Company must respect all regulations put in place that govern its activities.



## Regulations in environmental matters

The Company implements an Environmental Policy to make sure that it complies with all applicable laws and regulations, while respecting the highest standards for environmental stewardship. All employees, senior managers and members of the board are made aware of the Company's Environmental Policy and all applicable laws in environmental matters relative to the area of business and activities of the Company in which they work, and they comply with them.

## Company's Social Responsibility

The Company considers its societal responsibility to be of great importance. It is a signatory of the United Nations Global Compact and therefore undertakes to promote, to its employees and partners, the United Nations Sustainable Development Goals as defined in their 2030 roadmap.

In this context, the Company expects all its employees, senior managers and members of the board to flawlessly respect human rights, international labour law and the exercise of a duty of vigilance concerning the various entities with which you will have to work in the professional environment. This Company's expectations also apply to its suppliers

For more information, see our Responsible Purchasing policy

The Company undertakes to respect the civil rights of all, notably absolute rights such as the right to life, the right to live in dignity, the right to be protected against torture, the right to personal safety, the right to individual property, freedom and the integrity of the person, the right to a trial in due and proper form and the right to be heard fairly when one is accused of an offence.

These rights include freedom of opinion and expression, digital rights and privacy, the right to peaceful assembly and free association, the freedom to adopt and practice a religion, freedom of belief and decision making, absence of arbitrary interference in private life, family, residence or correspondence, the right to access public services, sports and culture and the right to take part in elections. They also include the rights of indigenous people (including free, prior and informed consent) and local communities, particularly with regard to women's rights.

The company is committed to promoting social dialogue within its workforce.

### WE SUPPORT



**Since 2019, Ecoslops has been committed to the UN Global Compact corporate responsibility initiative and its principles in the areas of human rights, labour, the environment and anti-corruption.**

## Laws relative to control of concentrations and anti-competitiveness

Laws relative to the control of concentrations may be complex and it is impossible to describe them fully in a guide to good conduct.

Generally, the laws relative to the control of concentrations prohibit understandings between competitors on questions such as price, sale conditions and the distribution of markets or customers. The courts may infer understandings from indiscreet conversations, informal discussions or mere exchanges between competitors of information that could lead to an agreement on prices or any other form of tacit agreement.

Generally, any practice which falsifies, hinders or eliminates competition must be avoided. If you find out about such situations, please immediately inform the Compliance Director.



## Political activities and responsible lobbying

Political activities of the Company, including contributions of a political character, are governed by various laws and regulations.

Contributions of a political character include donations of money to political parties



or candidates, lobbying legislators or public officials, the use of employees or assets of the Company and any other activities of a political nature.

The Compliance Director must give prior, written authorisation for any contribution of a political character that is made, any raising of funds or any campaign carried out on behalf of the Company, to make sure that the contributions are compliant with the Company's policy on the fight against corruption, that they are allowed by the applicable law and that appropriate information is given about them.

## **Notification by an employee, senior manager or member of the board of the loss of authorisations necessary to the exercise of their functions**

It may be that, at a given moment, an employee, senior manager or member of the board is the subject of an enquiry from a public authority pursuant to activities outside their functions or arising from activities prior to those within the Company.

If the investigation leads to the loss of authorisations necessary to the exercise of their functions, for example, the loss of a driving licence or work permit, the Compliance Director must be informed.

## **Honest behaviour / Relationships with employees, customers, suppliers and service-providers and the regulatory authorities**

Protection of the good reputation of the Company is crucial. The way we deal with our employees, customers, suppliers and service-providers, as well as with regulators, forms this reputation. Unfair competition can take the following forms:

- Disorganisation of a competitor company, notably through disclosure of its know-how, corruption of its personnel or incitement to strike.
- Dishonest approaches to customers, through misleading advertisements of cessation of activity, false advertising, misleading claims to the entirety of an installation; the systematic prospecting of customers of the competitor company; or recommending oneself in the name of the competitor company.
- The misappropriation of files: for example, the use of customer files obtained fraudulently
- Misappropriation of orders: for example, the fact, for employees under notice, of delaying the execution of orders in order to pass them to the company that they have created. The following also constitute unfair competition: executing the orders of a competitor for one's benefit, approaching customers of a competitor after having sought to have them believe that the new company was economically related to the said competitor, provoking the termination of orders, canvassing

in the name of the competitor, or for a former employee to continue to present themselves in the name of their ex-employer.

- Confusion: creating, either by imprudence or negligence, confusion or risk of confusion with the company of a competitor or with their products or services constitutes an act of unfair competition.
- Denigration, which consists of publicly discrediting the products, company or personality of a competitor with the aim of misappropriating its customers or, more generally, of harming it in the hope of making profit (if the competitors denigrated are easily identifiable, even if the facts revealed by the perpetrator of the denigration are accurate, it is an act of unfair competition)
- Free riding: unduly appropriating the reputation of a competitor in order to profit from its reputation, work, efforts, research or investments without spending anything or by spending far less than would normally have been necessary to reach the same result, if one had not benefited from the effort of the other.

The company ensures a responsible relationship with its suppliers and service providers by asking them to sign the company's Responsible Purchasing Charter. This has been put in place to improve transparency and due diligence on suppliers' social responsibility policies.

## **PROTECTION AND PROPER USE OF THE ASSETS OF THE COMPANY**

The assets of the Company are intended to be used by the employees of the Company to conduct its activities.

Assets of the Company include information and documents relative to the business of the Company and its employees or customers, its equipment, its cash its intellectual property rights and its IT and communication systems.

### **Books and documents of the Company**

The books and documents of the Company must duly account for all transactions. In the context of routine commercial activities, all employees, senior managers and members of the board must ensure the proper accounting of transactions in due time and that they are properly allocated and, where applicable, obtain appropriate authorisation. The Company will not tolerate any false or misleading entry in its books or registers, for whatever reason.

### **Conservation of documents and archives**

Appropriate retention of relevant documents is a good practice both at the ethical

and business levels. The Company takes care to protect and retain the necessary documents to comply with legal and regulatory requirements and for the financial and operational requirements of our company. Employees, senior managers and members of the board must preserve the documents of the Company and may under no circumstances destroy documents belonging to the Company, nor decide to keep them outside the premises of the Company or in storage facilities designed for this purpose.

If you should learn of an injunction to produce documents, a dispute or an ongoing administrative investigation, the Compliance Director must be immediately informed. The relevant documents are retained until the Compliance Director informs you of how to proceed.

If you suspect that documents belonging to the Company have been altered or destroyed irregularly, the Compliance Director must be immediately informed. In order to comply with the General Data Protection Regulation (GDPR), and due to personal information contained in job applications received and not accepted by the Company, these will not be retained (without the written agreement of the applicant).



## Use of the Company's assets

The assets of the Company are protected against any improper use, waste, abuse, negligence, theft or loss and they must be used efficiently to further the purpose of the Company. When you leave the Company, all of the assets of the company in your possession must be returned.

The Company authorises personal, ancillary and occasional use of computers, printers, photocopiers and communication devices, but this must be kept to a minimum. Employees, senior managers and members of the board must not use the assets of the Company for external professional activities.



# CONFIDENTIAL INFORMATION

It is your responsibility to protect the confidential information of the Company in the same way as any other asset belonging to it.

## Confidential information and commercial secrets

Some of the information that you will receive in the context of your work is confidential. This information is protected and must not be disclosed, unless this is authorised or required by the law.

Confidential information constitutes any information about the Company and third parties such as an employee, a customer, a supplier or a service provider, existing or potential.

You undertake not to disclose any information, plan, study, design, project, achievement or software studied in the company or on behalf of subsidiaries of Ecoslops that you may encounter in the performance of your functions and which may harm the company.

This obligation for confidentiality, specified in the employment contracts of employees, applies both with regard to third parties and employees of the company. It remains fully effective during the period of the employment contract and is extended after its termination for any reason whatsoever.

Neither may confidential information belonging to your previous employer be disclosed to members of the board, senior managers or employees of the Company.

## Insider trading

Ecoslops is listed on the Paris stock market on Euronext Growth. In this context, you may be privy to inside information (information of a precise nature which has not been made public and which, if it were made public, would be likely to significantly influence the share price).

Pursuant to regulation EU n° 596/ 2014 on market abuse and the French monetary and financial code, anyone having inside information must not carry out or attempt to carry out insider trading (by acquiring or disposing, for their own account or on behalf of a third party, directly or indirectly, financial instruments to which this information relates or by cancelling or modifying orders given previously on financial instruments of the company) subject to penalties.

Persons exercising managerial responsibilities within the Company (members of the board and «senior managers», persons having regular access to inside information

about the company and the power to take management decisions concerning its future development and strategy) must not make any transaction for their own account or on behalf of third parties during a period of thirty calendar days preceding the announcement of an annual or interim report.

## Collection of information relative to other companies

It is quite legitimate to collect information on other companies, notably those which are our customers and those with which we are in competition in various ways. However, obtaining commercial secrets or other exclusive information by illegal or unethical means, such as theft, spying, corruption or the breach of a non-disclosure agreement is prohibited. The source of any information that you collect about another company must always be identifiable. The collection, in any manner whatsoever, of personal information on the employees or senior managers of these companies is not possible.

## Brands, copyright and other intellectual property rights

The Company recognises and respects individual property rights belonging to third parties. The use of the name, brands, logos or printed documents of another company must be regular and compliant with applicable law.

1. **Brands:** The logos of the Company and the name «ECOSLOPS» are examples of brands belonging to the Company. The use of our brands must be regular and any counterfeiting committed by third parties must be reported to your line manager and to the Compliance Director.

2. **Respect for copyright:** books, articles, designs, computer software, musical media and other digital media, as well as all other elements of the same nature, may be protected by copyright laws. Any unauthorised copying of these elements protected by copyright constitutes a breach of these laws. The fact that such an element is available on an Internet site or the absence of any mention of such copyright does not necessarily mean that these elements are not protected by copyright.

The Company holds usage licences for a large number of its software programs and digital media that it has purchased from external companies. In most cases, these software programs and digital media are protected by copyright. Care should be taken not to make, acquire or use unauthorised copies of media or computer software.

# COMMUNICATIONS FROM THE COMPANY AND REQUESTS FOR INFORMATION

The Company has an obligation to make sure that its messages are accurate and coherent and commits to responsible marketing and communications, avoiding all gender stereotypes (9). If you are not an authorised spokesperson of the Company, you cannot speak in the name of the Company to the media, to members of the financial community, to shareholders or to other groups or organisations about the activities of the Company, unless you have been specifically authorised to do so by an authorised spokesperson of the Company. Any request for financial or other information about the Company is sent to the Financial Director and to the Chief Executive Officer.

Furthermore, if you are asked to make a presentation to an external audience, in the capacity of representative of the Company, the approval of your line manager is required and the Financial Director and the Chief Executive Officer must be informed. The documents that you prepare for the presentation must also be approved by your line manager and examined by the Financial Director and the Chief Executive Officer.

Employees are free to post personal comments or photos on social media. However, employees may not speak, comment or post comments on behalf of the Company on social networks or Internet blogs without having received specific authorisation for this purpose from the Company. Furthermore, the policies of the Company relative to the disclosure of confidential or important information which has not been made public must always be complied with on all occasions.





# QUESTIONS – REPORTING CONCERNS OR BREACHES

The present Guide to Good Conduct and the policies, principles and business practices described within it are essential for the success of the Company. No member of the board, no senior manager and no employee of the Company may tolerate any breach of these standards.

It is everyone's responsibility to ask questions if they have any doubt about the best conduct to adopt in a specific situation. It is also important to report any presumed breach, particularly any situation or transaction likely to be considered unethical or risking a conflict of interest, as soon as possible after having become aware of it. Anyone who, in good faith, reports a presumed breach will not under any circumstances expose themselves to any disciplinary penalties or any other form of reprisal.

You are invited to ask questions and to report any presumed breach through your normal hierarchy, because your line manager is likely to know the best way of resolving the situation.

If you are not at ease with this process or you consider that it has not responded to your previous concerns, you can contact:

- Compliance Director: [compliance@ecoslops.com](mailto:compliance@ecoslops.com)

The Financial Director of the Group, Vincent Feÿs, has been designated in this capacity.

In all cases, the identity of the person making this report will remain confidential to the extent that this is reasonably possible. The report may be made anonymously through one of the aforementioned procedures. It is of little importance who you contact; however, it is important that your concerns are highlighted.

## Reprisals

Any form of retaliation against an employee for reporting concerns, a suspected violation of the Code of Conduct or local and international regulations, or for participating in an investigation will not be tolerated. If you believe that retaliation is being taken against you, a whistleblower or a facilitator, please contact the Compliance Manager.

## Investigations

The Company will carry out an investigation, as soon as possible, into any credible concerns or breaches. It is imperative that employees do not carry out their own investigation. Investigations may involve complex questions and, if you act alone, you could compromise the integrity of an investigation, which could harm you and harm the Company. Employees who are the subject of an investigation and who participate in one are required to tell the truth, to cooperate fully with this investigation and to keep confidential all information relative to it during the period of the investigation and once it is completed.

## Compliance with the Guide to Good Conduct

The Company intends to do everything which is reasonably within its power to prevent any conduct not compliant with the present Guide to Good Conduct and, if such conduct occurs, to bring it to an end as soon as possible after having become aware of it.

# APPENDICES

# POLICY ON THE **FIGHT AGAINST CORRUPTION**



The Company, including all its subsidiaries (together the «Company»), has a policy of complying with all applicable anti-corruption laws in all countries in which the Company exercises its activities, and of faithfully accounting for all transactions in its books and registers.

The Company also has a policy of requiring compliance with the same laws and practices from certain third-party intermediaries, representatives, consultants and commercial partners who work on its behalf.

To find out more about the Company's policies, please consult the Guide to Good Conduct.

The payment of sums of money or even the offer of expressions of commercial courtesy (as they are described below) or anything else of value, such as gifts, invitations or other expressions of hospitality, to public officials (as this term is defined below) is likely to breach the applicable laws against corruption.

Employees of the Company are prohibited from paying or offering bribes or from being offered or receiving bribes. It is also prohibited for them to offer expressions of commercial courtesy or anything else of value to remunerate a person for the exercise of a function or an activity that they must normally exercise, or to encourage or remunerate the unlawful exercise of a function or an activity.



Any person contravening this prohibition will be liable to disciplinary and/or judicial sanctions.

For the purposes of the present Policy, informing and engaging with public officials (including legislative and regulatory bodies) for the purposes of asserting the legitimate commercial interests of the Company is not considered illegitimate, providing it complies with the present Policy.

If you have questions about the present Policy, please contact the Compliance Director.

## Public officials

Although the present Policy prohibits corruption both in the commercial sector and the public sector, payments to or on behalf of public officials and the offer of expressions of commercial courtesy to such public officials deserves rigorous monitoring and must be subject to prior examination and authorisation by the Compliance Director.

For the purposes of the present Policy, the term «public official» must be interpreted broadly and covers not only the elected officials of a government, but also any agent or civil servant of a government or a ministry, an agency or a subdivision of the said government (such as a company or other public commercial enterprise) or an international public organisation. This term also designates anyone acting in an official capacity for or on behalf of such a government or ministry, agency or subdivision, or for or on behalf of any international public organisation. For example, the following are public officials:

- a head of state
- a member of a royal family
- an official of a ministry or an agency
- a judge, magistrate or legislator
- a senior manager or an employee of a public company, notably public services and establishments in the financial, banking, health and transport sectors
- private persons acting officially on behalf of a ministry, a public agency or a subdivision of government
- an official of an international public organisation (such is the World Bank, IMF, United Nations)

- an official of a public agency
- a political party, a party manager or a candidate for public functions
- an official of a public pension scheme or fund.

For the purposes of the anti-corruption laws, it is of little importance whether a person is considered as a public official by the government in question.

If you have any questions about whether a particular person is considered a public official or whether a particular entity is considered as a «subdivision», please contact the Compliance Director.

## Expressions of commercial courtesy

Corruption is not limited to the payment of sums of money with the intention to corrupt. It can also consist of the offer of expressions of commercial courtesy or other things of value, such as gifts, expressions of hospitality or invitations for an unlawful purpose. It is under no circumstances authorised to offer an expression of commercial courtesy with the aim of corrupting or for an unlawful purpose.

Furthermore, it is not permitted to offer, directly or indirectly, any expression of commercial courtesy to a public official, except in cases authorised beforehand by the Compliance Director, as specified below (except in the case of dispensation in accordance with the provisions below).

Expressions of commercial courtesy may be, for example:

- gifts
- promotional items
- travel expenses
- meals, invitations, entertainment and other expressions of hospitality
- tickets for sporting or cultural events or events of any other kind
- gifts to charities – in cash or in various forms of sponsorship (such as dinners or golf tournaments)
- business opportunities

- products or services at reduced prices or free
- work experience courses or employment contracts for public officials or members of their family
- loans
- medical insurance.

## **Restrictions on the offer of expressions of commercial courtesy to commercial contacts other than public officials**

Employees may only offer expressions of commercial courtesy to commercial contacts if the following general conditions are complied with:

1. the cost related to expressions of commercial courtesy must be reasonable and justifiable with regard to the circumstances (no more than €50 per person or the equivalent value of this amount in the local currency concerned);
2. expressions of commercial courtesy must be compliant with the applicable laws;
3. expressions of commercial courtesy must not reasonably be interpreted as an attempt to obtain or retain undue commercial advantage and must not harm the reputation of the Company or the beneficiary;
4. expressions of commercial courtesy must be offered in good faith and must have a direct link with a legitimate commercial purpose, such as:
  - a. the promotion, demonstration or explanation of the products and services of the Company, or
  - b. the execution of a contractual obligation;
5. expressions of commercial courtesy must be legitimately supported by receipts and vouchers in accordance with applicable procedures for the reimbursement of expenses and accounting procedures.

## **Restrictions on offering expressions of commercial courtesy to public officials**

Employees may not offer expressions of commercial courtesy to public officials unless all of the general conditions listed above, as well as the following additional conditions, are complied with:

- a. the expressions of commercial courtesy must be authorised beforehand by the Compliance Director (except in the case of dispensation in application of the provisions below);
- b. expressions of commercial courtesy must be offered openly and transparently and must not be offered to encourage or remunerate the unlawful exercise of an official function or activity;
- c. expressions of commercial courtesy must not involve any transfer of sums of money; any expressions of commercial courtesy involving cash equivalents, such as gift cards and gift cheques, require the prior authorisation of the Compliance Director, in accordance with the provisions below; and
- d. in the case of a genuine gift, such as a gift relating to festivals, expressions of commercial courtesy must not have an extravagant value, they must only be offered to express respect or gratitude and must be infrequent (no more than twice a year).

## **Dispensation from the requirement to obtain prior authorisation for certain routine and reasonable expressions of commercial courtesy offered to public officials**

The Company may sometimes, in the normal course of its business, offer public officials routine and reasonable expressions of commercial courtesy, which are exempt from the aforementioned requirement for prior authorisation, providing that they have a direct link with a legitimate commercial purpose and that they comply with all of the requirements in the present Policy, notably respect for local laws.

This is the case:

- a. for meals and refreshments offered to participants and those speaking at events organised by the Company, providing that the cost of these meals and refreshments is reasonable, given the place where the event in question is held;
- b. meals and refreshments offered during meetings with public officials, whatever



the place where they are held, providing that these meals and refreshments have an insignificant value (no more than €50 per person or the equivalent value of this amount in the local currency concerned); and

c. personalised objects bearing the Company's brand, which are offered during events and conferences organised by the Company, providing that these objects have an insignificant value (no more than €50 per person or the equivalent value of this amount in the local currency concerned).

**IF YOU HAVE ANY DOUBT ABOUT WHETHER A PARTICULAR EXPRESSION OF COMMERCIAL COURTESY COMES WITHIN THE SCOPE OF APPLICATION OF THIS DISPENSATION, PLEASE CONTACT THE COMPLIANCE DIRECTOR.**

## **Restrictions on the acceptance of expressions of courtesy**

### **Professional invitations**

A professional invitation consists of a meal, a sporting event, a cultural event or any comparable activity in which you and a professional contact participate together, or any conference or other professional event for which the expenses, the travel or the accommodation are paid by the professional contact.

Unsolicited professional invitations are permitted if they are justified by a legitimate professional purpose; they do not have an excessive value; they are appropriate by their very nature; and they are offered or accepted without any express or implicit obligation for compensation.

### **Gifts**

A gift is a present that is intended for you or your family only. It may be something of value, notably tickets for sports events, wine, a service, etc. A gift may be accepted if it is compliant with acceptable business practices (value less than €50) and that the disclosure of its existence to the public would not have any harmful impact on the company or the persons involved. Do not accept gifts (even gifts at the time of festivals) unless they are authorised by the present Policy.

No amount in cash or cash equivalent, of any amount whatsoever, may be accepted outside the remuneration paid by the Company to employees for specific achievements. Cash equivalents may include cheques, loans, gift cards and gift cheques, as well as pre-paid debit or credit cards.

Although this may seem rude, refusing a gift or a professional invitation can be done politely. You can always thank the person for their generosity but stress the fact that the policy of the Company does not enable you to accept the gift or professional invitation.

## **Facilitation payments**

«Facilitation payments» are generally defined as amounts paid to officials to facilitate the completion of routine administrative formalities to which the person or the company is entitled, such as processing documents, delivering visas or obtaining a telephone connection. In other words, the official is normally and generally required to complete these formalities, but he/she demands the payment of a relatively modest «additional» amount to perform them.

In principle, facilitation payments are prohibited by the present Policy. However, these payments may be made only under exceptional circumstances when, for example, an employee is under stress and is coping with potential problems of safety or risk of personal harm. Under such circumstances, you must immediately inform the Compliance Director of such a payment and specify the circumstances in which it was made. These payments must be described precisely and accounted for in the books and registers of the Company.

## **Third-party intermediaries**

The Company may not make payments through third-party intermediaries which, if they were made by the Company itself, would constitute a breach of the present Policy or any of the applicable laws against corruption and bribery. Consequently, before concluding or renewing contracts with representatives, consultants or any other third-party intermediaries who represent the Company in business with customers and the public authorities, you must follow the verification procedures described below. The time and effort that must be devoted to such verifications will depend on the number and complexity of the questions raised during the examination process.

# ENVIRONMENTAL POLICY



**Our mission is to contribute to the energy transition and the preservation of the environment through innovations that preserve stocks of raw materials and avoid pollution.**

Our roots in the circular economy, our technologies and know-how enable the low-carbon-intensity manufacture of new energy products. As a responsible circular-economy company, we are particularly attentive to our environmental impact.

Ecoslops undertakes to comply with the environmental laws of each country where the group is present, and to apply them, not as an ultimate objective, but as a minimum level to be satisfied.

## **Environmental challenges & ambitions**

Ecoslops has identified its impacts and environmental challenges and takes care to control and reduce its energy consumption, its discharges to natural environments (water, air, soil), its production of non-recyclable waste, its use of natural resources and its impact on biodiversity.

Ecoslops develops new techniques, products and services for its customers by seeking to constantly improve their energy efficiency and reduce their environmental footprint.

For purposes of measurement and comparison, an appraisal is carried out and new objectives are set each year.

## **Voluntary publication**

Although it is not subject to any legal obligation for publication in the matter, Ecoslops has chosen to communicate on its environmental management transparently through the annual publication of a sustainable development report, backed by recognised performance indicators.

## **Governance in matters of environmental responsibility**

Reiterated in the HSEQ policy and the group's Guide to Good Conduct, our environmental policy is binding upon our employees. It is also communicated to our suppliers, from whom we expect an equal level of commitment.

Ecoslops undertakes to raise awareness amongst its employees and encourage their participation in the company's environmental efforts.

*The management validates and encourages this environmental policy.*



# HEALTH, SAFETY, ENVIRONMENT & QUALITY POLICY



**Health, Safety**, the **Environment** and **Quality** are priority concerns for Ecoslops' management.

In accordance with Ecoslops' Code of Conduct, the HSEQ policy applies to all of the Group's units and to all of the businesses over which it exercises effective control.

## **Legal Requirements**

In all of its host communities, Ecoslops complies with applicable laws and regulations and expands on them, when needed, with specific requirements and commitments.

## **Professionalism, Respect for Rules and Knowledge Sharing**

Throughout its organization, Ecoslops instills a corporate culture based on professionalism, strict compliance with and implementation of rules, skills management, regular feedback within and among facilities and continuous learning. It deploys employee training plans to promote this mindset.

## **Operational Accountability**

All employees, at every level, must be aware of their role and personal responsibility in carrying out their duties and take a highly disciplined approach to preventing accidents and malicious acts; protecting property, health and the environment; ensuring product and service quality; and taking stakeholder expectations into account. They must also report all hazardous situations or any non-compliance with safety rules immediately.

## **Selection of Partners**

Ecoslops favors the selection of its industrial and business partners on the basis of their ability to apply policies concerning security, safety, health, the environment, quality and corporate social responsibility equivalent to its own.

## **Risk Assessment and Management**

Ecoslops regularly assesses risks and policies across its operations in the areas of security, safety, health, the environment, quality and corporate social responsibility and implements appropriate risk management measures. Ecoslops is particularly attentive to keeping its facilities clean, uncluttered and in order.

## **Management System Assessment and Improvement**

Ecoslops regularly assesses its operations' management systems in the areas of safety, health, the environment, quality and corporate social responsibility in collaboration with employees and their representatives. Within the framework of these reviews, it measures the results achieved, sets improvement targets, deploys action plans and

organizes the oversight process to promote continuous improvement.

## Preparedness Plans and Resources

Ecoslops implements preparedness plans and resources to respond to different types of events that may arise, including emergencies. These plans and resources are regularly updated and tested during drills.

## Environment

Ecoslops is committed to managing its energy consumption, emissions in natural environments (water, air and soil), production of final waste, use of natural resources and impact on biodiversity. It develops new processes, products and services for its customers with a focus on improving their energy efficiency and reducing their environmental footprint.

For further information, see our [Environmental Policy](#)

## Corporate Social Responsibility

In matters of security, safety, health, the environment and quality, Ecoslops adopts a constructive attitude based on transparency and open dialogue with stakeholders and outside parties. In particular, it is committed to contributing to the sustainable development of neighboring communities, with a focus on people, economic and social issues. Ecoslops conducts its operations in compliance with human rights, International Labour Organization standards and its U.N. Global Compact commitments and promotes best practices across the value chain.

For further information, see our Guide to Good Conduct.



#OpenMind

WE BELIEVE IN CURIOSITY



#Agility

WE DO AGILE MANAGEMENT



WE TRANSMIT A CONSTRUCTIVE KNOW-HOW

#Exemplarity





WE LOVE NATURE

#Environmental  
sensitivity



NONE OF US KNOW  
WHAT WE KNOW ALL TOGETHER

#TeamSpirit



WE ARE NOT AFRAID TO GET WET

#Implication



**For all questions concerning ethics :com-  
pliance@ecoslops.com**

*Ecoslops Guide to Good Conduct  
Update dDecember 30th, 2022*

