



**ADDEV**  
MATERIALS

ETHICAL CHARTER

## BASIC PRINCIPLES

We conduct our operations in accordance with the “TEAM” principle: Transparency (or Trust, which includes honesty and integrity), Enthusiasm, Autonomy, and Motivation. On a daily basis, we ensure respect for human rights and international labor standards, while also following our CSR policy. We are committed to respecting the legitimate interests of our internal and external stakeholders (employees, customers, suppliers, shareholders, local communities, public institutions). These principles and commitments apply to all ADDEV Materials operations, regardless of geography or local customs.

### 1. Compliance with laws, regulations, and ethical business principles

Under all circumstances and in all the countries in which we operate, ADDEV Materials employees are required to comply with the laws and regulations in force and with the rules of professional ethics relating to their activities.

It is every manager’s responsibility to ensure that their teams comply with the rules governing their activities.

It is also each individual’s responsibility to be aware of the risks associated with their activities in their region of operation, using Transparency International’s Corruption Perceptions Index (<https://www.transparency.org/en/cpi/2022>).

Individuals may also refer to other texts, including:

- France’s Sapin II Law on transparency, fighting corruption, and the modernization of the economy: <https://www.legifrance.gouv.fr/iorf/id/JORFTEXT000033558528>
- The U.S. Foreign Corrupt Practices Act (FCPA): <https://www.iustice.gov/criminal-fraud/foreign-corrupt-practices-act>
- The U.K. Bribery Act: [https://www.legislation.gov.uk/ukpga/2010/23/pdfs/ukpga20100023\\_en.pdf](https://www.legislation.gov.uk/ukpga/2010/23/pdfs/ukpga20100023_en.pdf)

Employees must have a minimum level of knowledge allowing them to determine when it becomes necessary to seek counsel from another employee, their manager, or a third party.

The Finance and Human Resources Departments are also available to all employees to answer any questions they may have.

### 2. Integrity and conflicts of interest

ADDEV Materials is committed to establishing mutually beneficial relationships with its suppliers, customers, and other partners. In all our transactions, we expect our partners to adhere to principles consistent with the United Nations Global Compact. ADDEV Materials is committed to being a trustworthy corporate citizen and, as a full-fledged member of society, we strive to fulfill our responsibilities towards the societies and communities in which we operate.

Each employee must demonstrate integrity and respect the commitments made in their relations with all stakeholders (customers, suppliers, and other partners). The treatment of

partners and suppliers must be fair, guided only by objective and transparent criteria, in accordance with our company's procedures.

ADDEV Materials employees must avoid personal activities and financial interests that may conflict with their professional responsibilities. ADDEV Materials employees must not use their positions to obtain advantages for themselves or for others.

### **3. Confidentiality**

ADDEV Materials employees have access to a great deal of information about the Group in the course of their work.

Unauthorized disclosure of confidential information is strictly prohibited as it may be detrimental to ADDEV Materials. As such, employees undertake to maintain the strict confidentiality of any non-public information relating to the company's business. They must refrain from sharing such information with third parties or exploiting it for their own benefit or for that of others.

This duty to maintain confidentiality shall continue to apply to employees even after they have left the company.

### **4. Fighting corruption, influence peddling, fraud, and money laundering**

ADDEV Materials and its leaders are committed to a zero-tolerance policy toward corruption, influence peddling, fraud, and money laundering.

Employees and corporate officers may neither offer nor receive any gift, invitation, or payment that would or could be viewed as an active or passive form of corruption. They are required to immediately refuse any such request or offer, and to report it using the whistle-blowing procedure. Employees and corporate officers may not use their positions or influence to affect a decision to be made by a third party. Just as can be done for a case of corruption, fraud, or money laundering, employees and corporate officers can use the whistle-blowing procedure to report a failure to comply with this code of conduct.

ADDEV Materials will pay special attention to its geographical areas of operation in order to identify and manage a high level of risk of corruption, influence peddling, fraud, or money laundering.

All employees are asked to be extremely vigilant with regard to the behavior of all our stakeholders, and more specifically our service providers, customers, and suppliers. Audits of anti-corruption procedures are carried out regularly with at-risk stakeholders.

In the event of detection of unlawful behavior, any contractual relationship with the involved party may be terminated.

#### **Definition of active corruption**

*Active corruption is when any person, at any time, directly or indirectly offers or gives to a French or foreign public official (a person entrusted with public authority or entrusted with a role in public service, an employee of a state-owned enterprise, etc.) or to a private individual (in the context of a work or social activity, a management role, or work for a natural person or legal entity) offers, promises, donations, gifts, or other forms of inducement.*

#### **Definition of influence peddling**

*Influence peddling is when a person sells their position or influence, whether real or perceived, to affect a decision to be made by a third party. It involves three parties: the beneficiary (the person who provides the advantages or gifts), the intermediary (the person who uses the*

*influence they possess by virtue of their position), and the target person who holds the decision-making power (a public authority or agency, magistrate, expert, etc.). Criminal law distinguishes between active influence peddling (by the beneficiary) and passive influence peddling (by the intermediary). Both offenses stand on their own and are subject to the same punishments.*

**Definition of fraud**

*Fraud is a deliberate and often illegal act intended to deceive or mislead a person or entity in order to unfairly or illegitimately obtain a personal, financial, or other advantage. This can take different forms, such as falsifying documents, concealing important information, or using deceptive means to obtain a profit or advantage at the expense of another party.*

**Definition of money laundering**

*Money laundering is the act of facilitating, by any means, the production of false evidence of the origin of the assets or income of the perpetrator of a crime or other offense that has procured for said perpetrator a direct or indirect profit. Money laundering may also involve assisting in the investment, concealment, or conversion of the direct or indirect proceeds of a crime or other offense.*



or must not be given. The only gifts or advantages allowed are ones of low value, not given in cash, that comply with current business practices and that do not violate any laws or regulations. Particular care must be taken during sensitive periods, such as while bidding, partaking in a competitive process, before a contract is awarded, etc.

## **6. Financing political activities, relations with public authorities, and sponsorships**

### **Financing political activities**

The financing of political parties is subject to laws that vary from country to country. Even when legal, these contributions may be abused or interpreted as a dubious practice. It is the policy of ADDEV Materials not to make any contributions, whether financial or in-kind, to political organizations or parties, or to political figures. ADDEV Materials respects the right of its employees to get involved individually in local political and civic life. Their participation must remain personal, on their own time, and at their own expense, in accordance with the law. The letterhead, funds, and other property of ADDEV Materials may not be used for personal political activities. To avoid any conflict of interest, ADDEV Materials employees must clearly separate their personal political activities from their roles within the company.

### **Relations with public authorities**

ADDEV Materials has a duty to promote and defend its legitimate business interests. ADDEV Materials will cooperate with governments and other organizations, either directly or through organizations such as trade associations, to participate in the development of laws and regulations that may affect its legitimate business interests.

Employees are free to take part in economic development groups and/or groups close to the ADDEV Materials ecosystem. This is an integral part of our CSR commitment to contribute to economic development.

### **Sponsorships**

When ADDEV Materials undertakes to provide sponsorship funds, it also undertakes not to divert such funds for illegal purposes (e.g., payment of bribes). To make these actions transparent to our teams and the public, the amounts given are made public upon request made to the management teams.

## **7. Competition**

ADDEV Materials believes in strong but fair competition and supports the development of appropriate legislation in this area. ADDEV Materials and its employees adhere to the principles of fair competition and all related regulations.

## **8. Respect for people and the environment**

ADDEV Materials is committed to diversity in a work environment where there is trust and mutual respect, and where everyone feels responsible for the performance and reputation of our company. The recruitment, employment, and promotion of our teams are carried out solely on the basis of the qualifications and skills required for the position to be filled. (See **Recruitment Policy**)

We prohibit all forms of discrimination based on race, ethnicity, gender, religion, sexual orientation or gender expression, disability, political orientation, social origin, or union membership, or any other aspect protected by applicable laws.

We are committed to ensuring that our employees can progress in their work and develop their skills and abilities. We respect the dignity of the individual and our employees' right to freedom of association, as well as their image rights. We maintain good communication with our employees through the information and consultation procedures established within our various entities.

We are committed to providing our employees with working conditions that do not endanger their health and safety.

Our policy of respect for human rights is underpinned by the international principles contained in the Universal Declaration of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

We do not use any form of forced or compulsory labor or child labor. We reject all forms of mental-emotional and/or physical violence and discrimination. We uphold the International Labor Organization's international labor standards and/or the laws in force in the country of operation, whichever is more restrictive.

We aim to create a working environment free of discrimination, where the diversity of profiles and skills is considered an asset that contributes to our growth and development. We are committed to equal opportunity and zero tolerance for discrimination or harassment.

Through the continuous improvement of ADDEV Materials' corporate social responsibility policy, we are committed to pursuing a mode of development that meets the needs of present generations without compromising the ability of future generations to meet their own needs.

Within this framework, we establish procedures and actions needed to align our business model with the Sustainable Development Goals and climate goals as set forth by the Paris Agreement and the United Nations Global Compact.

Our collaborative innovation approach aims to meet our customers' industrial challenges, optimizing their performance while guaranteeing operator safety and the traceability of the products used. We are keen to promote more socially-responsible economic development, with processes that limit waste. We work on the basis of a scientific approach, applying strict standards for the safety of products, people, and the environment.

## **9. Protection of personal data**

We adhere to the intended use of our customers' personal data and undertake not to disclose or sell such data to third parties outside the Group. In this regard, we are working on the deployment of the General Data Protection Regulation (GDPR) throughout our group of companies.

ADDEV Materials has also obtained the international Cyber Essentials certification, which gives tangible form to our cybersecurity policy in relation to our customers and suppliers. It demonstrates the company's commitment to protecting its own data and that of its customers while confirming that the most important cybersecurity controls have been implemented.

## **10. Ethics governance**

On a day-to-day basis, all employees are key players in the implementation of the ethics rules and principles described in this policy.

As for line managers, they have specific obligations: to pass on information, raise awareness, train, and monitor.

## 11. Wistleblowing

As an extension of its commitments, ADDEV Materials provides a whistleblowing mechanism, to be used in the event of one or more of the unethical behaviors mentioned in this policy, such as in a case of corruption or harassment. Anyone can report non-compliance with the ethics policy directly to their line manager. If no response is received within a reasonable period of time, or in special cases, the alert may be sent directly to the CEO and/or Human Resources Director. Anonymity and/or confidentiality will be guaranteed. To do this, the alert can be sent via an anonymous email address (<https://www.arobase.org/gratuit/annuaire-messageries.htm>), from an external connection to the ADDEV Materials sites, or by mail with no indication of the sender. Additionally, the whistleblower can rest assured that they will not be subject to retaliation for a report made in good faith. Anyone retaliating against whistleblowers shall be systematically punished.  
[p.nadobny@addevmaterials.com](mailto:p.nadobny@addevmaterials.com) / Chairman

These communication channels can also be used when in doubt about an ethical issue.

Checking this box signifies: I work in the procurement, sales, or finance department, or in company management, and I undertake to complete the e-learning course “Doing business free from corruption.” (<http://www.fairedesaffairesanscorruption.com/>)

I have read the ADDEV Materials ethics policy and agree to abide by its principles.

### Document approval:

Name: Pascal Nadobny, Chairman & CEO of ADDEV Materials

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