



ADDEV
MATERIALS

CODE OF CONDUCT
BUSINESS ETHICS

BASIC PRINCIPLES

This Code of Conduct formalizes the fundamental principles and commitments of ADDEV Materials regarding responsible conduct. It is structured around three main pillars: our commitments, our expectations for employees, and our expectations for stakeholders in our value chain.

We ensure daily compliance with human rights and international labor standards while adhering to 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 geographic or cultural distinctions.

I. Our commitments

1. Integrity and Ethical Relationships

ADDEV Materials is committed to building relationships based on integrity, transparency, and fairness with all its stakeholders: employees, customers, suppliers, and partners. Our conduct adheres to the principles of the United Nations Global Compact, aiming for mutual benefits and responsible corporate citizenship.

2. Respect for human rights

ADDEV Materials promotes diversity, equal opportunities, and a work environment that respects human rights, supported by its social policy, commitments to Human Rights (see social and human rights policy), and recruitment policy (see hiring policy). ADDEV Materials is committed to fostering diversity in a workplace built on trust and mutual respect, where everyone feels responsible for the company's performance and reputation. Recruitment, employment, and promotion within our teams are based solely on the qualifications and skills required for the position.

3. Fighting Corruption and Fraud

ADDEV Materials adopts a zero-tolerance policy towards corruption, influence peddling, fraud, and money laundering. We are committed to rejecting any advantage that could influence a business relationship or professional decision. Our objective is to maintain 0 incidents of corruption, fraud or money laundering each year. Our procedures include regular audits and a whistleblowing mechanism to report suspicious behavior.

4. Gifts, Compensation, and transparency

The exchange of gifts or benefits is strictly regulated to prevent any undue influence on business relationships. Only symbolic gifts that comply with business customs are permitted, excluding sensitive periods such as tenders.

5. Confidentiality and Information Security

The confidentiality of information related to our company, clients, and partners is paramount. Since 2021, we have been certified Cyber Essentials and strive to maintain high standards in cybersecurity and personal data protection, in compliance with the GDPR. Our objective is to maintain the number of security incidents affecting the confidentiality, integrity or availability of information at 0 each year.

6. Political and institutional relations

ADDEV Materials does not fund any political organization or public figure. We encourage individual participation that respects legal frameworks. Regarding sponsorship and patronage, we ensure transparency and the absence of actions or lobbying activities that run counter to our environmental and social commitments.

7. Fair competition

We believe in fair competition and strictly comply with competition laws and regulations in all our business activities.

8. Environmental Responsibility

ADDEV Materials aligns with sustainable development principles and strives to reduce its environmental impact by applying the guidelines of its environmental policy (*see environmental policy*). Our responsible and innovative processes aim to protect the planet while meeting the needs of our stakeholders.

II. Expectations of our employees

We conduct our operations according to our TEAM values: Enthusiasm, Autonomy, and Motivation, but also the T for Transparency, or Trust in English, which encompasses honesty and integrity. We expect our employees to embody these values and the commitments outlined in our Code of Conduct on a daily basis. This includes:

1. Integrity and Ethical Relationships

Act with integrity in all their interactions, respecting the principles of fairness, transparency, and loyalty toward all stakeholders.

2. Respect for human rights

Adopt exemplary behavior regarding respect of human rights, the fight against discrimination, and the promotion of an inclusive and supportive work environment.

3. Fighting Corruption and Fraud

Reject any form of corruption or fraud, promptly reporting any situation that contradicts our ethical policies through the mechanisms made available to them

4. Gifts, Compensation, and transparency

Respect internal rules regarding the exchange of gifts or benefits. Only symbolic gifts that comply with business customs are allowed, and any initiative outside of these rules must be reported and approved.

5. Confidentiality and Information Security

Preserve the confidentiality of sensitive information, ensuring its protection against any disclosure or misuse, even after the end of their collaboration with the company.

6. Political and institutional relations

Ensure transparency and neutrality in any political or institutional contribution. This includes ensuring that any sponsorship or patronage activity involving our collaboration is aligned with our values and approved in advance.

7. Fair competition

Act with integrity to ensure fair competition, strictly complying with applicable laws and regulations. This includes reporting any actions or behaviors that may violate these rules and maintaining impeccable conduct in all business activities.

8. Environmental Responsibility

Be vigilant about the environmental and social impacts of their actions, actively contributing to the company's sustainable development goals.

III. Expectations of our value chain partners

We expect our business partners and all actors in our value chain to integrate and apply the ethical principles outlined in our Code of Conduct, as well as in our responsible sourcing charter (*see sustainable purchasing charter*). These commitments are essential to building a collaboration based on integrity, responsibility, and sustainability. They include clear expectations regarding ethical behavior, respect for human rights, confidentiality, and the fight against corruption.

1. Integrity and Ethical Relationships

Adopt an approach based on transparency, mutual respect, and fairness in all their interactions with ADDEV Materials. Partners must also refrain from any behavior that generates a conflict of interest or inappropriate use of resources made available to them, and comply with the principles of the United Nations Global Compact.

2. Respect for human rights

Promote diversity, equal opportunities, and working conditions that respect human rights.

3. Fighting Corruption and Fraud

Clearly commit to opposing corruption, fraud, money laundering, and influence peddling. All business relationships must remain transparent, and any suspicious behavior related to our activities must be reported immediately.

4. Gifts, Compensation, and transparency

Limit exchanges to symbolic gifts that comply with business customs, excluding any attempt to influence business relationships or decisions. No inappropriate advantage should be offered or accepted, particularly during sensitive periods such as tenders.

5. Confidentiality and Information Security

Protect data shared within the framework of business relationships by adhering to contractual and legal confidentiality obligations. Partners must implement strong cybersecurity practices and ensure compliance with the GDPR to protect personal and professional data.

6. Political and institutional relations

Act with transparency and refrain from any political or institutional initiative that is incompatible with our values. Sponsorship or patronage activities related to ADDEV Materials must reflect our ethical commitments and be approved in advance.

7. Fair competition

Strictly adhere to competition laws and regulations to ensure fair business practices. Partners must reject any unfair behavior or actions that go against healthy competition.

8. Environmental Responsibility

Adopt ethical and sustainable practices to help reduce environmental impact, in line with our environmental policy.

IV. Ethics Governance

On a daily basis, all employees are the primary actors in implementing the rules and ethical principles outlined in this Code of Conduct. Hierarchical managers have specific obligations: to communicate, raise awareness, train, and monitor. Ethical issues are addressed by the ethics committee. This committee is composed of members from the human resources, finance, sales, procurement, and sustainability departments. The committee reviews ethical issues twice a year and revises the Code of Conduct annually. Extraordinary meetings may be held when the reporting system is activated. Depending on the source of the alert, employees from the relevant geographic area may be involved.

V. Whistleblowing System

As part of its commitments, ADDEV Materials provides a whistleblowing mechanism in case of non-compliance with one or more ethical behaviors mentioned in this code, such as in cases of corruption or harassment. Anyone can report non-compliance directly to their supervisor. If no response is given within a reasonable timeframe or in specific cases, the alert can be sent directly via the form: <https://forms.office.com/e/DfR3c6hXhW>.

In accordance with the provisions of section 2° of II of article 17 of law no. 2016-1691 of December 9, 2016, on transparency, the fight against corruption, and the modernization of economic life (known as the "Sapin II" law), the company is committed to ensuring the anonymity, confidentiality, and protection of the whistleblower. Individuals who retaliate against whistleblowers will be systematically sanctioned.

These communication channels can also be used in case of doubts related to an ethical issue.

VI. Disciplinary measures

Any breach of the Code of Conduct, including corruption, fraud, money laundering, breach of confidentiality or any other breach of internal policies, will result in appropriate disciplinary action, proportionate to the seriousness of the offence.

Approval of the document:

Name : Pascal NADOBNY, Chairman & CEO ADDEV Materials

Last revision date: August 20, 2025



APPENDIX 1: Corruption risk mapping

The vast majority of our 13 countries of operation are considered low-risk for corruption. In 2023, 10 countries have an index above 65 (United Arab Emirates 68, United States 69, France 71, United Kingdom 71, Belgium 73, Canada 76, Germany 78, Netherlands 79, Singapore 83, Norway 84). Only 3 countries have an index below 65 but still above 30 (Mexico 31, India 39, Poland 54)

TRANSPARENCY INTERNATIONAL

CORRUPTION PERCEPTIONS INDEX 2023

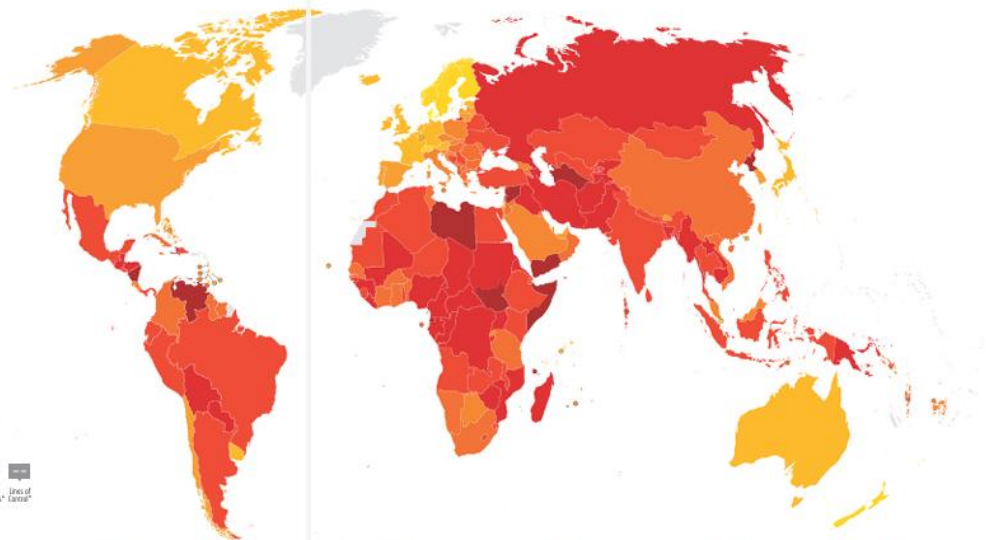
180 COUNTRIES. 180 SCORES.

HOW DOES YOUR COUNTRY MEASURE UP?

The perceived levels of public sector corruption
in 180 countries and territories around the world.



**The data points are based on the perception of corruption in the public sector for the 2023 year. The data is based on the perception of corruption in the public sector for the 2023 year. The data is based on the perception of corruption in the public sector for the 2023 year.



SCORE	COUNTRY/TERRITORY	SCORE	COUNTRY/TERRITORY	SCORE	COUNTRY/TERRITORY	SCORE	COUNTRY/TERRITORY
90	Denmark	69	Barbados	54	Poland	43	Benin
87	Finland	69	United States	54	Slovakia	43	Ghana
85	New Zealand	68	Bhutan	53	Cyprus	43	Oman
84	Norway	68	United Arab Emirates	53	Georgia	43	Senegal
83	Singapore	67	Taiwan	53	Grenada	43	Solomon Islands
82	Sweden	66	Chile	53	Rwanda	43	Timor-Leste
79	Netherlands	64	Bahamas	52	Fiji	42	Bahrain
78	Germany	64	Cabo Verde	52	Saudi Arabia	42	China
78	Luxembourg	63	Korea, South	51	Malta	42	Cuba
77	Ireland	62	Israel	51	Mauritius	42	Hungary
76	Canada	61	Lithuania	50	Croatia	42	Moldova
75	Estonia	61	Portugal	50	Malaysia	42	North Macedonia
75	Australia	60	Latvia	49	Greece	42	Trinidad and Tobago
75	Hong Kong	60	Saint Vincent and the Grenadines	48	Namibia	41	Burkina Faso
73	Belgium	60	Spain	47	Vanuatu	41	Kosovo
73	Japan	59	Botswana	46	Armenia	41	South Africa
73	Uruguay	58	Qatar	46	Jordan	41	Vietnam
72	Iceland	57	Czechia	46	Kuwait	41	Colombia
71	Austria	57	Dominica	46	Montenegro	40	Colombia
71	France	56	Italy	45	Romania	40	Côte d'Ivoire
71	Seychelles	56	Slovenia	45	Bulgaria	40	Guyana
71	United Kingdom	55	Costa Rica	45	São Tomé and Príncipe	40	Suriname
		55	Saint Lucia	44	Jamaica	40	Tanzania
						40	Tunisia
39	India	34	Ecuador	28	Mali	21	Eritrea
39	Kazakhstan	34	Indonesia	28	Paraguay	20	Afghanistan
39	Lesotho	34	Malawi	27	Cameroon	20	Burundi
39	Maldives	34	Philippines	26	Guinea	20	Chad
38	Morocco	34	Sri Lanka	26	Kyrgyzstan	20	Comoros
37	Argentina	34	Turkey	26	Russia	20	Democratic Republic of the Congo
37	Albania	33	Angola	26	Uganda	20	Myanmar
37	Belarus	33	Mongolia	25	Liberia	20	Sudan
37	Ethiopia	33	Peru	25	Madagascar	20	Tajikistan
37	Gambia	33	Uzbekistan	25	Mozambique	20	Libya
37	Zambia	32	Niger	25	Nigeria	18	Turkmenistan
36	Algeria	31	El Salvador	24	Bangladesh	17	Equatorial Guinea
36	Brazil	31	Kenya	24	Central African Republic	17	Haiti
36	Serbia	31	Mexico	24	Iran	17	Korea, North
36	Ukraine	31	Togo	24	Lebanon	17	Nicaragua
35	Bosnia and Herzegovina	30	Djibouti	24	Zimbabwe	16	Yemen
35	Dominican Republic	30	Eswatini	23	Azerbaijan	13	Syria
35	Egypt	30	Mauritania	23	Guatemala	13	South Sudan
35	Nepal	29	Bolivia	23	Honduras	13	Venezuela
35	Panama	29	Pakistan	23	Iraq	11	Somalia
35	Sierra Leone	29	Papua New Guinea	23	Cambodia		
35	Thailand	28	Guinea	22	Congo		
		28	Gabon	22	Guinea-Bissau		
		28	Laos	22			

Since 2021, ADDEV Materials has been regularly tracking the number of corruption incidents and whistleblowing procedures. These indicators are at 0 for 2023 and 2024, and our goal is to maintain these KPIs at 0 over the long term.

APPENDIX 2: Questions and answers, case studies

Q1: A supplier wants to give me a valuable gift during a call for tenders. What should I do about this?

A: Refuse any gift or benefit that could influence a professional decision. Only symbolic gifts in line with commercial practice are authorised. Report any ambiguous situation via the alert mechanism.

Q2: I've discovered that a colleague is bypassing internal processes to validate a payment. What should I do about this?

A: Report the situation immediately to your line manager or via the alert mechanism. Any behaviour that circumvents internal controls may constitute fraud.

Q3: I've been asked by a political organisation to make a donation on behalf of the company. Can I accept?

A: ADDEV Materials does not fund any organisation or political figure. Refuse any solicitation and inform your manager or the ethics committee.

Q4: I suspect a case of money laundering involving a business partner. What should I do?

A: Any suspicion should be reported immediately via the alert mechanism. Do not attempt to resolve the problem yourself and do not inform the suspected partner.

Q5 : I see a potential conflict of interest in a business decision. What should I do?

A: Report the conflict immediately to your manager or via the dedicated form. Refrain from making any decisions until the conflict has been resolved.

Q6: A colleague shares confidential customer information without authorisation. What should I do about this?

A: Report the leak immediately via the alert mechanism. Always respect the confidentiality of information and RGPD obligations.

Q7 : I want to ensure that my actions have a minimal environmental impact. What can I do about this?

A: Follow the principles of the company's environmental policy, reduce waste, favour sustainable solutions and report any contrary practices to your managers.

Q8: I notice unethical behaviour in my team but I'm afraid of reprisals. Can I report it anonymously?

R : Yes. The whistleblowing mechanism guarantees the anonymity, confidentiality and protection of whistleblowers. Any reprisals are strictly punished.

APPENDIX 2 : Regulatory framework

Sapin II Law :

The Sapin II law, adopted in France in 2016, imposes strict measures to prevent and detect acts of corruption. As such, we have implemented a clear code of conduct, specific training for our employees, third-party evaluation processes, and internal whistleblowing mechanisms. We also conduct regular audits to ensure the transparency and compliance of our practices.

GDPR :

The General Data Protection Regulation (GDPR), which came into effect in 2018, governs the processing of personal data within the European Union. ADDEV Materials ensures the confidentiality and security of collected data, ensures explicit consent from the individuals concerned, and respects their rights to access, rectify, and delete their data. Our Data Protection Officer (DPO) leads compliance efforts and oversees the necessary technical and organizational measures.

CSRD :

In parallel, we comply with the European directive on corporate transparency (CSRD), which requires us to publish detailed information about our environmental, social, and governance (ESG) impact. We integrate the Sustainable Development Goals (SDGs) and track verifiable indicators to measure and improve our non-financial performance, in a transparent and auditable approach.

APPENDIX 3 : Definitions

Active corruption

Active corruption refers to the act of offering or giving, directly or indirectly, to a French or foreign public official (a person entrusted with public authority, tasked with a public service mission, an employee of a public enterprise, etc.) or a private individual (in the context of a professional or social activity, a leadership role, or work for a natural or legal person) offers, promises, gifts, presents, or other forms of inducement.

Influence Peddling

Influence peddling refers to the act of a person monetizing their real or perceived influence to affect a decision made by a third party. It involves three actors: the beneficiary (the one providing benefits or gifts), the intermediary (the one using their credibility due to their position), and the target person who holds decision-making power (such as public authorities, administration, magistrates, experts, etc.). Criminal law distinguishes between active influence peddling (on the part of the beneficiary) and passive influence peddling (on the part of the intermediary). Both offenses are independent and are punishable in the same manner.

Fraude

Fraud is a deliberate and often illegal act aimed at deceiving or misleading a person or entity in order to gain a personal, financial, or other advantage in an unfair or illegitimate manner. It can take various forms, such as document falsification, concealment of important information, or the use of deceptive means to obtain a gain or advantage at the expense of others.

Money Laundering

Money laundering is the act of facilitating, by any means, the false justification of the origin of assets or income obtained by the perpetrator of a crime or offense, which has provided them with a direct or indirect profit. Money laundering also includes assisting in a transaction for the placement, concealment, or conversion of the direct or indirect proceeds of a crime or offense.

Information Security Incident

An information security incident is an event that compromises or threatens the confidentiality, integrity, or availability of sensitive or critical information within an organization. This can include incidents such as data breaches, intrusions into computer systems, malware attacks, human errors leading to data loss, or other events that compromise information security.