

CODE OF CONDUCT

MECACHROME



Message from the CEO

Dear Colleagues,

The Mecachrome Group will become even more resilient, successful and capable of taking on the challenges of today's world if it adopts first-rate management tools.

The Code of Conduct is one such tool.

This Code of Conduct is designed to constitute a baseline and a solid set of shared values and principles to guide us all, helping us to understand the key regulatory and societal issues of our environment. It will equip us with the knowledge that we need to face the future collectively with full peace of mind, while safeguarding our know-how.

Encouraging ethical behaviour throughout the company is not just a business rule, it is the law (the French Sapin II law, which plays an important role in this Code), and beyond that, a powerful asset for creating a better work environment. Our ambition is to establish a healthy environment here at the Mecachrome Group, to help you thrive, develop your skills and advance. Irreproachable behaviour, leading by example and applying every aspect of this Code of Conduct are essential pre-requisites for a confident approach to the challenges that lie ahead.

I have no doubt that all the issues addressed in this Code of Conduct matter to you, and I know you will play a proactive role in applying it from day to day.

Christian Cornille







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Role of the Code of Conduct in our day-to-day activities









Role of the Code of Conduct in our day-to-day activities

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Why do we need a Code of Conduct?

The Mecachrome Group is a world-class industrial player working with high-profile international customers such as the Airbus Group, Safran, Dassault and Alpine.

With over 20 sites worldwide, we need clear, shared rules to govern our day-to-day behaviour. We must make sure that we act ethically as we conduct our business, to protect our know-how, aim for excellence and meet the requirements of our markets.

This Code of Conduct aims to prevent all types of inappropriate behaviour which could put the Group and its Employees in situations with the potential to cause major harm (criminal, financial or business-related consequences, damaged image or reputation, etc.).

What are our responsibilities?

We must, at all times:

- Act in compliance with this Code of Conduct
- Avoid any situation or activity which might be in conflict with Mecachrome's ethical principles and the law
- Ask for advice from our manager if the meaning of any aspect of the Code of Conduct is unclear, or if we have to deal with an ethical dilemma
- Report any question or concern about suspected breaches of the Code of Conduct as soon as possible
- Maintain a spirit of solidarity between us and be loyal to the Group. Team spirit is a fundamental aspect of well-being at work and our collective success.



The Code of Conduct is first and foremost a guide describing all the behaviour expected of each Employee, regardless of their grade, job or the country they work in.







The Group commitments to its Employees

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• Respect for our Employees' fundamental rights and human values

The Group pledges to respect the fundamental rights and freedoms of each Employee, along with human values, such as the prohibition of child labour, human dignity, fair treatment, religious freedom, freedom of association and trade union membership, etc.

Labour laws and employment conditions

We comply with labour laws to make sure our Employees have the best working conditions, wherever they do their job.

We proscribe any type of forced labour, under coercion, threat or obligation, within the Group, and all undeclared work, meaning all our Employees are officially declared as per the rules in force. Child labour is proscribed.

Social dialogue

We encourage individual Employees to speak up, and we listen to what they have to say. We respect Employee representative bodies and freedom to join a trade union; we undertake voluntary negotiations of collective agreements to build solid social foundations.



• Respect for our Employees' fundamental rights and human values

Fairness, diversity, inclusion and non-discrimination

The Group pledges to guarantee equal treatment and opportunities for all its Employees. Decisions concerning recruitments, salaries and promotions in the Group are based solely on professional skills. The Group proscribes all forms of discrimination for any reason, especially ethnic, social, cultural or national origin, gender, physical appearance, disability, family circumstances, sexual orientation, age, political opinions, religious beliefs or trade union activity. We strive to make sure we offer a truly fair approach to training and skill development, and the principle of gender equality is extremely important to us.



Zero tolerance of harassment

Every Employee has the right to be respected and treated with human dignity. The Group promotes trust and mutual respect between Employees.

Accordingly, the Group proscribes any form of pressure or psychological or sexual harassment.

It is also the duty of all together Employees to warn the Group of any breach of fundamental rights and any failure to respect human values of which they become aware, regardless of whether the breach concerns an Employee or stakeholder.

2. Our health, safety and environment policy





- The Group pledges to guarantee safety in the workplace. It does so by limiting the risk of work accidents, impacts on health, exposure to physical and psychosocial risks, and by protecting the health of its Employees, subcontractors, visitors and others. For example, it sets up appropriate prevention and training plans and provides its Employees with personal protective equipment.
- Each Employee also pledges to comply with the traffic rules in the plants, and the Highway Code when using a vehicle.
- It must make sure its Employees do not work under the influence of any legal or illegal psychotropic substances (alcohol, tobacco, cannabis, etc.).
- The Group also pledges to maintain a hygienic, pleasant work environment, and to be attentive to the well-being of all its Employees, both in its plants and offices and when travelling.



As part of a sustainable development approach, the Group is required to draw up an environmental policy that includes measuring and reducing its impact on the environment, ideally based on ISO 14000 or similar.

To safeguard the well-being of our people and our environment, the Group and all its Employees will take care to:

- Use low-carbon energy sources (opting for electrical power rather than gas/fuel) and a low-carbon electrical power supply (<100 g CO₂/kWh)
- Strive to minimise, during production, material offcuts and shavings, and have them recycled via a specialist channel
- Draw up and implement a risk analysis and procedure regarding toxic discharge in all types of environments.

Generally speaking, we must all together implement and follow procedures for analysing all types of risks involving an environmental impact, along with action plans aimed at reducing or eliminating the negative effects as far as possible.



Mecachrome pledges to respect its Employees' privacy.

It pledges to process, retain and protect the personal data collected, consulted, analysed, used and/or stored by each data controller, or subcontractor, in the course of Group business, in strict compliance with the personal data protection laws (GDPR or similar applicable laws). Mecachrome refrains from processing sensitive data such as that concerning religion, political affiliation, race, sexual orientation or medical data. It will also respect its Employees' image rights.

Each Employee whose data is processed will be entitled at any time to request access to the personal data concerned, its modification and/or deletion, by contacting the Data Protection Officer for France, at the following email address: <u>dpo@mecachrome.com</u> or, for other countries, by contacting the site manager concerned. To ensure the Group is able to honour its commitment, each Employee required to process personal data as part of their professional duties must comply with the rules laid down for each processing operation, only share the data with people who legitimately need it, comply with the archiving rules and destroy the data when it is no longer needed.



Compliance with Group values and regulations by our Employees







1. Fighting corruption and influence peddling



Applicable regulatory framework in the fight against corruption

As part of our 'zero tolerance' policy regarding corruption, Employees of the Mecachrome Group are required to comply with the applicable laws and rules in their country, as well as international standards for the matters described below.

Anti-corruption laws applicable to Mecachrome

- Sapin II law (France)
- CFPOA law (Canada)
- UK Bribery Act (British customers)
- FCPA (American customers)

We have summarised the main principles of the Sapin II law below. It applies to **all Group Employees**, including those working for subsidiaries located outside France. Generally speaking, the other laws mentioned above are based on the same principles as those laid down in the Sapin II law.



Why comply with the Sapin II law?

• The Sapin II law applies to all companies with at least 500 Employees or revenues of more than 100 million euros. Above all, it is therefore a legal obligation, and non-compliance may result in sanctions.



Today, a solid ethics policy with zero tolerance of corruption is part of the selection criteria applied by <u>our</u> <u>customers</u> and <u>various partners (shareholders, banks, etc.)</u>. Failure to comply with the Sapin II law can therefore lead to being excluded from calls for tenders, termination of contracts, refusal of borrowing requests, a damaged reputation, etc.

Definition and illustration of corruption offences

Corruption is a criminal offence. It is defined as an act whereby an individual holding a specific public or private function solicits or accepts a gift, offer or promise with the intention of carrying out, delaying or refraining from carrying out an act which falls directly or indirectly within the scope of their functions.

Corruption can be public or private, active or passive:

Active public corruption

Offering an improper advantage to a public official so that the latter carries out or refrains from carrying out an act within the scope of his functions.

Passive public corruption

Taking advantage of her/his function within the public sector by soliciting or accepting gifts, promises or advantages in exchange for carrying out or refraining from carrying out an act within the scope of her/his functions.

Active private corruption

Offering an improper advantage to a natural person or legal entity in the private sector so that the latter carries out or refrains from carrying out an act within the scope of her/his functions.

Passive private corruption

Taking advantage of her/his function within the private sector by soliciting or accepting gifts, promises or advantages in exchange for carrying out or refraining from carrying out an act within the scope of her/his functions.



The following are deemed to be corruption offences:

Unlawful acquisition of interests

This occurs when a public official takes, receives or keeps, either directly or indirectly, any type of interest in a company or transaction for which he or she is in charge (in whole or in part), when the offence takes place, of monitoring, administration, winding up or payment.

Influence peddling

This occurs when an individual with a degree of influence over other individuals trades that influence for a benefit offered by a third party seeking to take advantage of her/his influence.

Public official bribery

This occurs when a public official receives or demands a contribution, tax or improper payment, or one which exceeds the amount actually owed.



HIGH-RISK SITUATIONS Gifts and invitations

Principle	It is not uncommon to offer gifts or invitations as a way of establishing or maintaining business relations: this is an expression of courtesy . Such expressions of courtesy can take different forms: a material gift (pen, bottle of wine or champagne), invitation (sporting event or show, etc.), promotional offer or reduction, and so on. They may be offered or received by customers, service providers or partners, provided they are proportionate and of little value (<€40). They must be offered or received transparently, and only in a professional context. Gifts must be exceptional, to ensure they are not interpreted as attempts to change someone's opinion or influence a business decision.
Good practice	 Refuse all gifts or invitations: that you would have trouble explaining to your line manager or Employees, whose value is excessive and disproportionate, given the circumstances, if you know or suspect that the aim is to change your opinion or influence a business decision Only accept an invitation to a restaurant if it is related to a routine work meeting, and unrelated to any call for tenders process, and provided the value of the meal is reasonable Never solicit a gift or invitation Contact your line manager in writing if you are unsure how to respond
Example	 A service provider offers me two tickets to a show outside of the professional context I notify my line manager in writing beforehand I refuse politely, explaining that it is not in line with Group policy

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Relations with consultants, intermediaries, public authorities

Principle	The normal business of Mecachrome may involve relations with consultants, business officials or intermediaries, individuals in a position of public authority or elected representative (mayors, prefects, police officers, members of the government, etc.). Given the nature of their functions or their influence, this type of relationship requires extra caution and an irreproachable attitude from an ethical standpoint. Any cash payment, gift or invitation, regardless of the amount, to public officials, with the aim of influencing their acts or decisions is formally proscribed. Employees must be extra careful in countries where corruption is common in the public and private sectors.
Good practice	 Do not offer or suggest any advantage of any sort during a certification process Do not make any facilitating payments, even if it is common practice in the country concerned Do not conduct business with any intermediary who does not comply with the anti-corruption rules, or does not provide convincing guarantees regarding their ability to comply with them (unwilling to share their identity or qualifications, lack of experience or staff, company owned by, or partially or fully controlled by a foreign public official or a family member or acquaintance of a foreign public official) Contact your line manager in writing if you have doubts about an intermediary
Example	In the course of an authorisation or licence request procedure, a public official suggests me pay a small sum of money to speed up the process: • I refuse, explaining that it is not in line with Group policy • I notify my line manager in writing.

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Selection of suppliers, service providers and subcontractors

Principle	The choice of suppliers, service providers and subcontractors must always be based on objective criteria, and never influenced by the granting of any sort of direct or indirect personal advantage. Extra care must be taken when selecting the Group's service providers and subcontractors, and the selection process must follow the procedures laid down in the Group Procurement policy. All service providers and subcontractors must, at the very least, comply with the rules set out in this Code, regardless of the applicable local rules. Compliance with these rules must be a criterion for selecting the service provider or subcontractor.
Good practice	 Analyse the reputation, values, financial position and background of your potential future supplier. Systematically assess this third-party provider before approving inclusion in the panel Comply with and have your points of contact comply with the procedures in the Group Procurement policy and the Code of Conduct for suppliers
Example	 A new service provider takes part in a call for tenders. It has a very good financial position, but I am not sure whether it complies with the anti-corruption rules: I share my doubts with my line manager in writing: he or she will tell me how to respond The Employee must assess all third-party providers with whom she/he wish to draw up an agreement, as per the procedure laid down by the Group, and make sure each supplier of the Mecachrome Group signs up to the Code of Conduct for suppliers.



Assessment of Group Customers



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Principle	Extra care must be taken when choosing customers, and the Group's business policy must be followed. In all cases, the choice of customers and/or any type of business or financial partner must be based on objective criteria, and never influenced by the granting of any sort of direct or indirect personal advantage. Consequently, all Group Employees are required to comply with the third-party assessment procedures in place before approving the inclusion of a business partner in the panel.
Good practice	 Analyse the reputation, values, economic and financial position and background of any potential customer before entering into any sort of relationship with them and throughout the duration of the relationship Check that the potential customer complies with the anti-corruption rules laid down in this Code.
Example	A customer issues a call for tenders. One of the tendering conditions is to work with a designated intermediary, who must be paid, in order to submit a tender and/or win the contract and/or be included in that customer's panel. If I am unsure about the type and wording of the customer's requests, and the actual role of the intermediary concerned, I share my doubts with my line manager in writing: he or she will tell you how to respond.

Sponsorship, partnerships, donations and political support

	Principle	Sponsorship, partnerships and donations equate to financial or material support given to partners unconditionally, as backing for educational, social or cultural initiatives. This type of support is not banned, but it must never be a trade-off for a business advantage or be intended to influence an official action.
		Gifts and payments in cash are formally proscribed and must never be handed over to natural persons.
		• Check who made the request, inquire into the quality and reputation of the organisation and the reality of the stated purpose
		• Notify your line manager in writing if you receive any sponsorship, partnership or donation request
	Good practice	 Check there is no conflict of interest and that the support given cannot be construed as an attempt to obtain an improper advantage or influence an official action
		 If you have doubts about the organisation or the purpose of its actions, notify your line manager in writing immediately
		Refuse any request for political support of any sort whatsoever
		A charity organisation reaches out to me, suggesting a partnership with the Group:
		 I check who made the request, inquire into the quality and reputation of the organisation I notify my line manager in writing: he or she will tell you how to respond.
F	Examples	A customer asks me to support her/his upcoming election campaign:
ΔĂ	LAMPICS	I refuse politely, explaining that it is not in line with Group policy
		 I notify my line manager in writing.
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Conflicts of interest



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Principle	Each Employee must act in the interests of the Group at all times and avoid any situation in which her/his action could be influenced, or appear to be influenced, by her/his personal interests and/or those of her/his close friends or family. Everyone must perform her/his profession duties in good faith and avoid any type of conflict of interest. Employees are not allowed to carry out another activity—regardless of whether it is paid or not—for a competitor or a company that has a business relationship with the Group, unless prior authorisation has been obtained in writing from her/his line manager.
Good practice	 When you are recruited, notify the Group of any situation that could give rise to a conflict of interest In case of an actual or potential conflict of interest, notify your line manager and give her or him all the information required to analyse the situation If you want to take on a second job with a customer, service provider or competitor, notify your line manager to request prior authorisation in writing
Example	My uncle runs a company that would like to take part in a call for tenders that you recently issued on behalf of Mecachrome. Should I notify my line manager? Yes, before you proceed any further in the call for tenders process. Your line manager will take all necessary measures to spare you a difficult situation.

Lobbying



Principle	Lobbying means any action to persuade or inform a public official by someone representing an interest, with the aim of influencing a public decision. All lobbying must be carried out in a loyal manner and with full transparency. The Group formally proscribes the imposing of any direct or indirect pressure on public officials with the aim of promoting the Group's economic interests.
Good practice	 If you are involved in any personal lobbying, clearly state that you do not represent Mecachrome Notify your line manager if you are in regular contact with public officials
Example	During a conversation with the mayor of my town, who also happens to be my neighbour, I find out that there are plans to build a new high-speed train station right next to my site, which would be a great way of attracting talents. However, the mayor does not seem very enthusiastic about the idea. I would like to make an appointment with him to try to convince him that it would highly advantageous. Should I notify my line manager? Yes, before contacting the mayor. Your line manager will confirm whether you can speak on behalf of Mecachrome after analysing the circumstances and defining the conditions.



Compliance with antitrust rules





Administrative and accounting traceability





Principle	Administrative and accounting traceability is a fundamental way of fighting corruption, especially actions to conceal inappropriate payments. Fake, misleading or incomplete records of transactions involving assets, funds or accounts that are not disclosed or recorded are strictly prohibited. Extra care must be taken concerning payments to intermediaries.
Good practice	 Refuse any request to create fake documents, for any reason whatsoever, and notify your line manager in writing Warn your line manager in writing if you have doubts about the reason for a payment made to an intermediary Generally speaking, if you have doubts about the recording of a transaction (disposal of an asset, unusual expense, financial flow, etc.), notify your line manager in writing immediately.
Example	I receive an unusual payment request (new bank details, supplier not listed in the panel, etc.), or I notice that the amount is twice as much as usual for that type of service. What should I do? Share the information with your colleagues, do not authorise the payment, and notify your line manager in writing.

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KEY TAKEAWAYS FOR FIGHTING CORRUPTION

If confronted with a situation that could undermine our ethics and compliance values, I ask myself:

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- Is it in line with the law and the Group's values and principles?
- Do I have a personal interest in this situation?
- What's the background to this situation?
- · How might this situation be construed from the outside?

If I am still not entirely comfortable accepting the situation, I consult my line manager, my CSR manager and/or legal department.



- Do not offer or accept a gift or invitation worth > €40.
- Promotional gifts, or 'goodies', of reasonable value with the supplier's name on them are tolerated.
- Only accept invitations to restaurants if they are occasional, related to a work meeting, outside of a call for tenders process, and of a reasonable amount.



How do we ensure compliance with the Code of Conduct?



TRAINING OUR EMPLOYEES

The best way is to provide training and raise awareness to help you better understand our values and fight corruption.

The Group arranges training and awareness-raising sessions tailored to the target audience, either in person or through elearning modules. These training courses are mandatory and you commit to completing the module assigned to you.

All Employees can freely consult the Code of Conduct at any time. It is appended to the company's Internal Regulations. It is available on the Mecachrome website and is also on display (QR code).



CONTROLS AND RISK OF SANCTIONS

Failure to comply with the rules laid down in this Code can have serious consequences, not just for Mecachrome, but for its Employees as well. Audits will be conducted regularly within the Group to make sure all Employees properly comply with the rules of good practice laid down in this Code.

Any breach of this Code may result in disciplinary sanctions, as described in the internal regulations.





INTERNAL WHISTLEBLOWER SCHEME

As part of the drive to establish an ethics and transparency culture, any Employee can report a situation or behaviour that her/his observes, and which appears to contradict this Code and the principles it advocates, to her/his line manager or the human resources manager.

If this reporting process seems complicated, inadequate or ineffective, Mecachrome has set up a whistleblower scheme platform to enable its Employees to report such situations or behaviour. In practice, Employees can report ethical issues by clicking on the following link: <u>https://mecachrome.vispato.com/</u>

The scheme guarantees all reports are treated as strictly confidential: the identity of the whistleblower, the facts and the people concerned are protected. The Group pledges to examine and handle every report and take all necessary action. In all cases, no Employee will be punished for reporting inappropriate behaviour or a breach of the Code if he/she acts in good faith. 'Good faith' means reporting a problem without malice and not for personal gain, providing evidence or reasonable grounds. The report will then be handled promptly by the people authorised to do so.





2. Compliant dealings with others 🛛 🐔

Import - Export

Our Employees must ensure their business practices comply with the laws, regulations and directives applicable to imports and/or exports of materials, parts, components, data and/or technical services. including any restriction on such operations (economic sanctions. embargoes, specific customs, tax, regulatory or other restrictions). Our Employees must provide reliable information and obtain the required licences.

Responsible sourcing of raw materials and components

Our Employees must ensure the materials and components supplied, including their constituent parts, are responsibly sourced. traceable. exclude the use of ore or any other type of material that is banned and/or finances, either directly or indirectly, armed groups that violate human rights. Employee Everv is responsible for gathering the information required to ensure traceability with regard to the other stakeholders concerning the origin of the products delivered, and must be able to explain their origin in the event of an inspection.

Product quality and safety

Our Employees must comply with the laws and regulations concerning product safety and quality, and establish a quality system capable of identifying and correcting defects.



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3. Confidentiality, protection of know-how and trade secrets

Here at Mecachrome, our know-how is priceless!

The Group as a whole operates different activities based on daily interactions and data processing.

This wealth of information is Mecachrome's corporate heritage, and any leaks, careless or incorrect handling of information can have harmful consequences.

Protecting this heritage is essential to guarantee our Group's growth and competitiveness.

Mecachrome therefore pledges to control the Group's information, on all media (tangible and intangible), and regardless of type or place.



Group Employees undertake not to disclose:

- The list of current customers and suppliers, prospects and business targets
 - · The content of business relationships or agreements
- Economic and accounting information about the Group's finances and position
 - Any sort of technical information (files, drawings, programmes, sketches, databases, etc.)
- Manufacturing techniques or any document describing our manufacturing methods and processes
 - Know-how and design models

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Every day, Mecachrome relies on **its information** and communication **system** to enhance its performance and pursue its development. These systems are essential to its business and constitute its backbone: information security is critical to protecting the Group's interests and those of its customers and partners.

Threats and attacks target technical, industrial and business-related data, as well as the Group's organisational, technical and human resources.

We protect our heritage by adopting a comprehensive, organised, wellmanaged approach internally. To mitigate the risks inherent to the use of information systems, we must first and foremost comply with good practice.

Applying these basic rules is a way of mitigating the risk of potentially harmful cyberattacks.

✓ Be sure to make a clear distinction between private and professional use.

Your personal communication channels, and any unfamiliar means of communication, must not be used for professional dealings (email, file transfer accounts, flash drives, etc.), and vice versa.

✓ Regularly update your digital devices.

Updates are not automatic: make sure you agree to them on your personal and professional devices to guarantee their security.

Protect access to your accounts via two-factor authentication whenever possible, or at least by creating complex passwords.

Your passwords must be long, complex, unique, secret and not contain any personal information.



\checkmark Never leave your devices unattended when you are on the move.

Otherwise, there is a risk they will be interfered with or compromised, or that your data will be stolen (e.g. never leave your PC in your car).

✓ Protect your workspace and your data.

Lock your workstation when you are not at your desk and store all sensitive equipment (PC, storage media) in a safe place.

\checkmark Think about the personal information you make available online.

Protect your digital identity by being careful about the information you share on the internet and social media.

✓ Protect your email account.

Be careful about opening attached files and do not click on links in messages that seem suspicious.

\checkmark Do not trust uncontrolled networks for device connectivity.

e.g. Public wifi networks, photo terminals, USB charging docks, etc.

\checkmark Be vigilant when making phone calls and taking part in video conferences.

Your conversations are not guaranteed to be confidential in public places and on public networks.

If you are unsure of anything or would simply like to ask a question, please contact the Information System Security department at: <u>sécurité.si@mecachrome.com</u>



Always remember that the first line of security for the information system is YOU!

WE ARE COUNTING ON YOU TO EMBODY OUR PRINCIPLES AND VALUES.

WE ARE HERE TO HELP YOU UNDERSTAND AND ADOPT THEM, SO THAT THEY BECOME SECOND NATURE

