

CODE OF ETHICS





WHY DO WE HAVE A CODE OF ETHICS?

Our code of ethics expresses our respect for human rights and our responsibilities to our customers and other stakeholders.

Ethical behaviour and international standards must guide the conduct of our companies. This code formalises the company's commitment to respecting Corporate Social Responsibility principles.

All SECAN employees must comply with this code. Everyone shall endeavour to behave in a fair and exemplary manner towards the company and the values it upholds.

The code complements, but does not replace, international or local laws, regulations and obligations.

We also expect our partners to respect the same principles.



OUR CSR COMMITMENTS

✔ CHILD LABOUR

To prohibit all forms of work by a child below the age at which compulsory education ends in the country concerned and, in any case, by a child under the age of 15, in accordance with the applicable regulations. No partners should use or benefit from child labour.

✔ FORCED OR COMPULSORY LABOUR, SLAVERY AND SERVITUDE

To prohibit all forms of human trafficking, modern slavery or servitude, forced or compulsory labour, i.e. any work or service obtained from a person without that person having offered it voluntarily.

✔ WORKING CONDITIONS

To guarantee our staff members safe and healthy working conditions, particularly with regard to working hours, in accordance with the laws and regulations.

✔ DISCRIMINATION

Not to tolerate or practise discrimination or harassment for any reason in workplace relations. This commitment prohibits any action based on any of the following criteria, without this list being exhaustive: sex or age, family situation or pregnancy, last name, ethnic, racial, social, cultural or national origin, religion, disability, health, sexual preference, trade union membership, or political opinion or engagement. Staff members should be recruited and promoted on the basis of their own merits and treated with dignity, without favouritism and with respect for their privacy.



✔ **DIVERSITY AND PARITY**

Diversity of origins, educational backgrounds and profiles is a driver of performance for our companies. We commit to guaranteeing the freedom of each individual and, as such, promoting diversity by ensuring the absence of proselytising.

✔ **EMPLOYABILITY**

To recognise competence, encourage innovation, and deliver training. Our knowledge lies with our women and men. Our duty is to make it grow.

✔ **ENVIRONMENT**

To apply the precautionary principle to environmental issues. To comply with applicable environmental protection legislation. To strive to reduce the environmental footprint of business activities through our continuous improvement initiative.

✔ **CORRUPTION**

To promote a no-tolerance policy concerning all forms of corruption, including influence peddling.

✔ **PERSONAL DATA**

To comply with applicable data protection regulations.



SOCIAL AND ENVIRONMENTAL COMMITMENT

TO PROVIDE A HEALTHY AND HIGH-QUALITY WORKING ENVIRONMENT



We are committed to providing a working environment **free of any kind of discrimination or harassment and to ensuring equal treatment.**

Mutual respect and trust must lie at the heart of our conduct.

We are committed to ensuring that all our **human resources practices comply with local and national legislation** in the countries where we operate, as well as **international standards.**

Quality of life at work is an important factor in ensuring productivity and performance.

The safety of our employees remains our priority. Everyone is responsible for observing all **health, safety and environmental requirements** and for ensuring that they are observed. Collective vigilance guarantees individual safety.

All these subjects are shared and supported by social dialogue.

Our partners must do the same.





RESPECTING THE ENVIRONMENT



The company is also committed **to minimising the impact of its own activities on the environment.**

SECAN undertakes to:

- Meet regulatory compliance requirements
- Prevent environmental pollution and damage
- Work to improve the energy performance of activities
- Involve all our partners in our continuous improvement initiative.

Our partners must do the same



ETHICAL BUSINESS CONDUCT



Relationships with our customers, suppliers and partners are based on the honesty and integrity we demonstrate at all times.

SECAN's commercial and purchasing activities, both in France and abroad, are carried out in accordance with the rules specific to each country, which all employees are required to know and respect.

FAIR COMPETITION

Although competition law varies from country to country, certain practices are commonly adopted:

- **Prohibited agreements and practices.** Agreements (written or oral) intended to fix prices, allocate customers or markets, coordinate bids, establish boycotts or exclude competitors are not allowed. Practices employed by companies that have the same effect or purpose as such agreements are also prohibited.
- **Abuse of dominant position.** Abuse of dominant position is prohibited under the same conditions as agreements. As such, this prohibition applies when practices have the purpose or effect of preventing, restricting or distorting competition within a market.
- **Prohibited behaviour.** We do not exchange information about prices, sales conditions, market allocation etc. with competitors.

CORRUPTION AND INFLUENCE PEDDLING

Corruption, including influence peddling, is a criminal and civil offence in most of the countries in which we operate.

It is therefore strictly forbidden for any employee to offer, promise or pay anything of value to a representative of the public administration or to any private person in order to obtain an undue advantage.

Similarly, no employee shall receive or benefit from gifts of more than nominal value.

In our business activities, we must not tolerate the payment of any bribes to third parties or accept any bribe from a third party.

Violating anti-corruption laws not only exposes SECAN to civil and criminal penalties, it can also render any employee liable to civil and criminal penalties (including imprisonment). Any employee guilty of these acts will be severely sanctioned and will not be allowed to continue working for SECAN.

CONFLICT OF INTEREST

All SECAN employees are bound by a duty of loyalty and the obligation to act in good faith.

A potential conflict of interest arises when we have conflicting interests at the same time. As such, when a personal interest conflicts with the interests of SECAN, we may be in breach of our duty of loyalty. This is the case whenever the possibility of any direct or indirect personal gain influences or might influence a decision related to our professional activity.

It is therefore the responsibility of each employee to report any conflict of interest that may arise in the conduct of business to his or her line manager.

COLLABORATION WITH SUPPLIERS

We collaborate with our suppliers and apply reliable and sustainable procurement procedures. We expect our suppliers to respect the laws of the countries in which they operate. We are committed to treating our suppliers and subcontractors fairly and we expect the same fair and ethical



treatment from them, towards us and their own suppliers.

To guarantee our suppliers' commitment to our ethical policy, all of SECAN suppliers have signed our supplier charter.

EXPORT COMPLIANCE

It is important that employees and all other stakeholders understand the export control rules. Compliance with export control laws and sanction schemes is essential in order to maintain export privileges.

DATA PROTECTION

SECAN adheres to all applicable legal requirements, including the European General Data Protection Regulation ("GDPR"), as well as all laws and regulations outside the European Union that may be applicable, both for its internal needs and with regard to all its partners.

We ensure compliance with GDPR requirements within our organisations—such as human resources (personal data policy), finance, legal, marketing (websites and communications) and sales—through the implementation of data protection guidelines.



HOW DO WE ENSURE COMPLIANCE WITH THE CODE OF ETHICS?

This code of ethics is available on the SECAN's website.

All employees must respect and apply the rules contained in this document, according to their roles and responsibilities.

To this end, everyone must be attentive not only to their own behaviour but also to that of those around them, their team members and the people they supervise, in order to help implement the code.

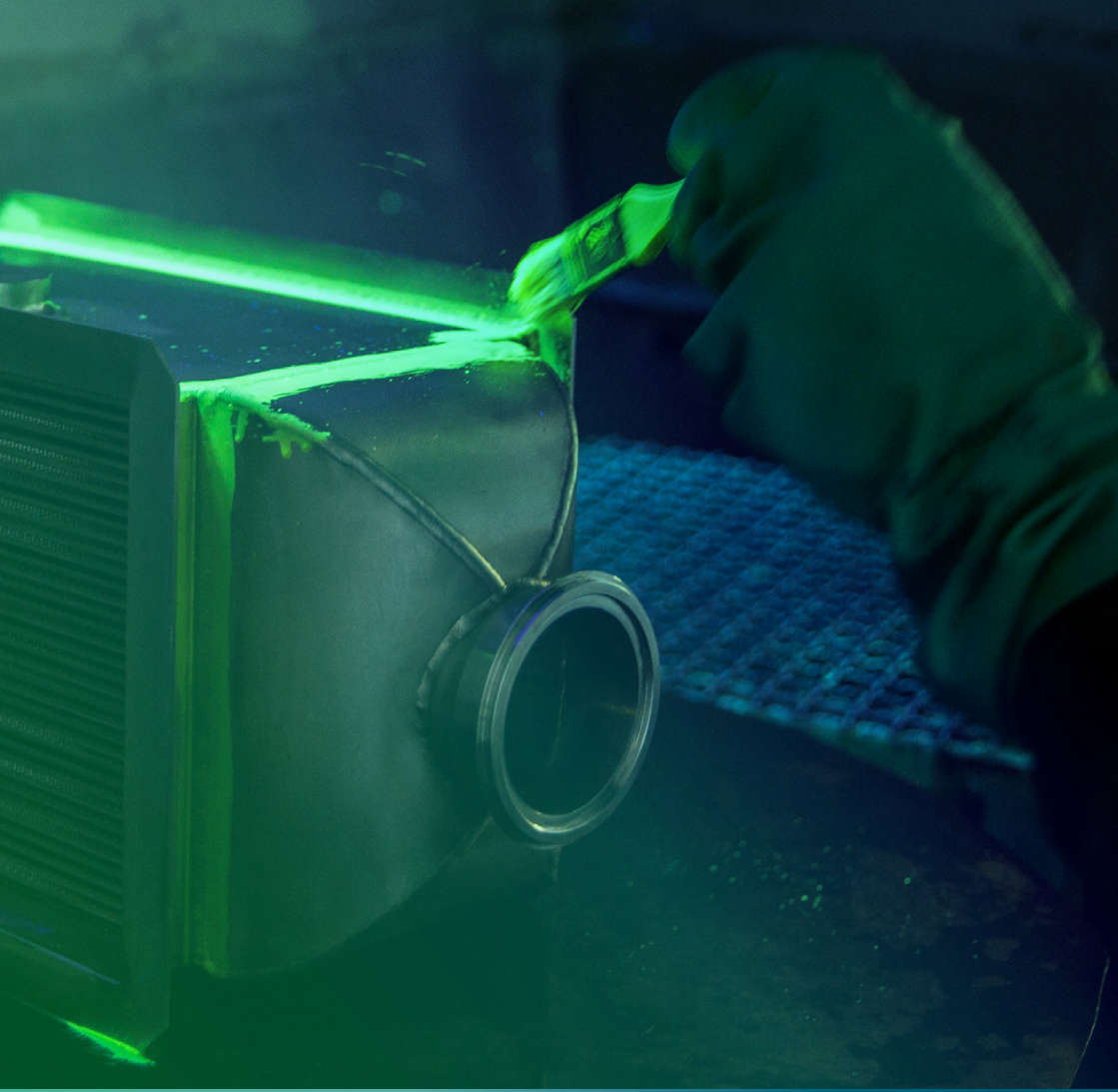
When an employee is confronted with an ethical problem, he or

she shall report it to his or her direct or indirect line manager, or to the head of the company in which he or she works, within a period of time that allows the latter to provide relevant advice or take the appropriate decision.

It is the responsibility of line managers and company management to help employees solve the difficulties they may face.

In case of doubt, the human resources department can be consulted.

No sanction may be imposed against an employee who has reported a breach of the rules of this code in good faith and in a disinterested manner.



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