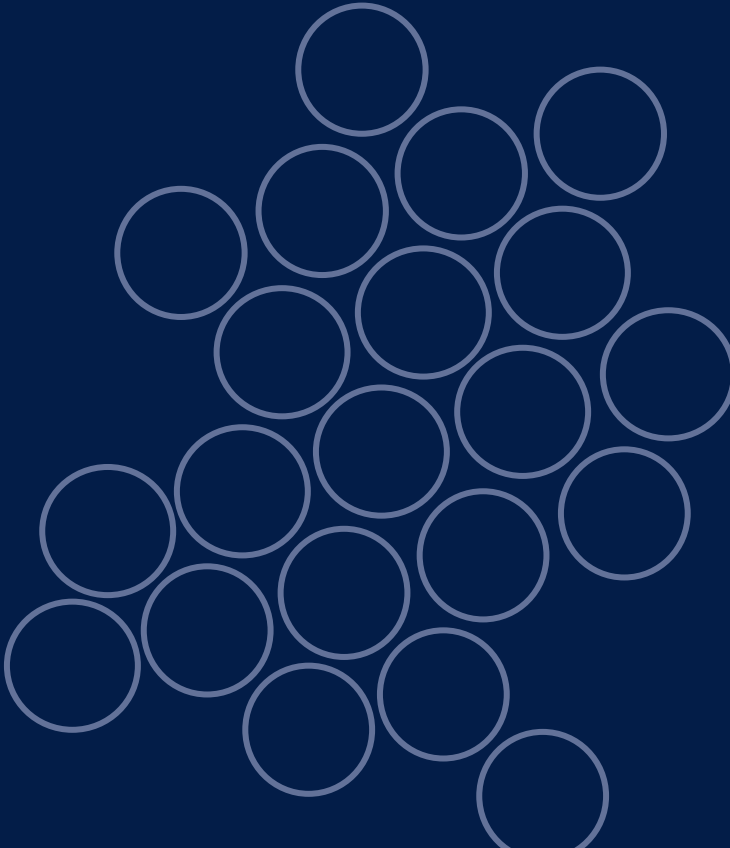


# ETHICS & ANTI-CORRUPTION POLICY RONDOT GROUP



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## MESSAGE FROM DIRECTOR

As a manager of the RONDOT GROUP Company, I consider corporate ethics to be crucial to our collective success.

Our Code of Ethics is not just guidelines, it represents our commitment to our customers, our business partners, our employees, and the community around us. It embodies our fundamental values such as respect, trust, and ethics, and our shared vision for the future of the RONDOT GROUP Company.

By putting it into practice every day, we create an environment where integrity is not only valued but also emphasized, where transparency is actively encouraged, and where every decision is guided by robust ethical principles.

I encourage you to take ownership of this Code of Ethics, to understand it, and above all to implement it in every interaction and decision you make within our company. We are all responsible for promoting this ethical culture. Each of us plays an essential role in making RONDOT GROUP not only a successful company, but also a respected and responsible company.

Our success is based on the trust we inspire. By adhering to these ethical principles, we reinforce our commitment to integrity and accountability. I am confident that each member of our team will contribute to making RONDOT GROUP a model of a responsible corporate citizen.

I express my gratitude to you for your dedication and commitment to these shared values. Together, we will build a future where RONDOT GROUP is recognized not only for its exceptional performance, but also for its exemplary ethics. This charter applies to all employees, wherever the company operates, as well as to its stakeholders. It can be supplemented by local charters or codes that comply with local regulations.

Sincerely,

Raphael Constantin, CEO.

February 1, 2024



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## I. ETHICAL PRINCIPLES OF THE RONDOT GROUP COMPANY

### I.1 IMPORTANCE OF ETHICS AND OBJECTIVE OF THIS CHARTER

***The ethical charter defines the principles and values to which Rondot Group and all its subsidiaries adhere and which must guide each Group employee in their daily professional practice.***

The RONDOT GROUP Company has developed this ethical charter, detailing the principles and actions aimed at honoring the Company's firm commitment to unreservedly prohibiting any form of unethical practices, as well as similar or equivalent behaviors, while complying with regulations and best practices in force. It constitutes an integral component of the internal policies and procedures already in place within the company, which must also be rigorously observed.

We respect the international, national and local legislation and regulations of the countries in which we operate and commit to adhering to them.

The RONDOT GROUP Company considers that respect, ethics and loyalty, and trustworthiness are fundamental values which must guide all its activities.

The chapters aim to provide help and advice, particularly in areas where ethical dilemmas may arise. In some cases, it can be difficult to exercise judgment correctly and because you are in a gray area, there is a risk of breaking the law, sometimes even without being aware of it. In this type of situation, any breach could compromise our ethical culture, harm the Group's reputation and possibly result in significant sanctions.

We must respect the Ethical Charter regardless of the location, context and economic situation in which we find ourselves.

### I.2 WHO IS THIS CHARTER ADDRESSED?

Our Ethics Charter is aimed at all stakeholders such as internal employees of all Group companies as well as external stakeholders. It applies to each one of us, managers and employees, at all levels within the Group. If you are a manager or team leader, your role involves additional responsibilities to enforce the Ethics Charter. The Group's policy is in particular to ensure that it avoids any reprisals against a person who, in good faith, raises a situation in contradiction with the Ethics Charter.

#### **As an EMPLOYEE, I MUST:**

- Know and understand the Ethics Charter;
- Act in accordance with the Ethics Charter and, in case of doubt, seek advice from my manager, my human resources manager, an external legal department in the country where I work.

- Embody and implement our Values, our rules of conduct, our behaviors and our principles of action in the daily exercise of my duties.

**As a MANAGER, I have additional responsibilities,**

**AND I MUST :**

- Lead by example, preserve, promote and implement the Ethics Charter in all my daily actions.
- Ensure that my team members always keep in mind and respect this charter.
- Ensure that I know the Ethics Charter sufficiently to be able to advise and guide my team members on the questions they may raise.
- Identify the risks related to non-compliance situations and make the right decisions in case of a problem falling within my area of responsibility.

**II. A HUMAN GROUP: RIGHTS & DUTIES OF EMPLOYEES.**

**II.1 HYGIENE AND SAFETY**

We commit to ensuring the health and safety of our employees, whether they work on our own sites or those of our clients.

- **Respect the rules.** The Group is very vigilant in complying with its health and safety obligations. Each of us must respect and comply with the current emergency legislation and procedures. When on a client's site, we must also adhere to all the client's health and safety rules, as well as their emergency procedures.
- **Provide support.** We encourage our managers to ensure the health and safety of their team members.
- **Stay vigilant.** We must identify and report any behavior that could pose a danger or risk, and any situation that could jeopardize the hygiene or safety of our employees, to the person responsible for hygiene and safety at the local level or to our manager.

**II.2 EQUALITY, DIVERSITY AND INTEGRATION**

Diversity is an essential characteristic of our Group, which is profoundly multicultural. It fosters creativity and innovation and contributes to establishing an inclusive culture for the benefit of all employees. Each of us has the right to equal opportunities and fair treatment.

- Employee engagement. Employee engagement is our main performance level and a key factor in attracting and retaining our talents. To ensure that our employees are interested in their work and motivated, we must continually interact with them to measure their level of interest, satisfaction and well-being at work. Performance management is an ongoing process based on a regular cycle of reviews.
- It is based on appropriate objectives and helps to optimize the qualities of employees by emphasizing the value they create as well as their contribution to the company.
- Equal opportunities and fair treatment. We strive to provide equal opportunities and fair treatment, regardless of social, cultural, ethnic or national origins, religious or other beliefs, caste, gender, marital status, pregnancy status, sexual orientation, disability, age, skin color, race, parental status, political ideology, military status and union membership. We are also committed to respecting all legislative provisions that combat discrimination.



*SHARE YOUR CONCERNS AND TALK OPENLY: If you are facing an issue regarding **equality, diversity and inclusion**, do not keep it to yourself. Discuss it with your manager or human resources manager who will help you.*

### II.3 CHILD LABOR, FORCED LABOR, AND HUMAN TRAFFICKING

We are dedicated to upholding the highest standards of ethical conduct, ensuring that all our operations respect fundamental human rights and labor principles as recognized in international law. As part of our commitment to responsible business practices, we prohibit the use of child labor, forced labor, and human trafficking across all our manufacturing entities and global distribution.

#### **Prohibition of Child labor**

Rondot Group strictly prohibits the use of child labor in all its operations, including in any of our manufacturing entities and global distribution centers. We ensure compliance with the ILO Convention No. 138, which sets the minimum age for employment at 15 years, or the legal minimum in the respective country, whichever is higher. Children under 18 years of age are not employed in hazardous work.

#### **Elimination of Forced labor**

We are fully committed to the elimination of all forms of forced or involuntary labor, in line with ILO Conventions No. 29 and No. 105. We prohibit bonded labor, human trafficking, and any other form of coercive labor practices. We enforce strict labor standards across our supply chains and regularly assess risks in high-risk regions.

## Zero Tolerance for Human trafficking

We maintain a zero-tolerance approach to human trafficking in any form. All employees, suppliers, and contractors must comply with internationally recognized human rights and labor standards, ensuring that no person is exploited or trafficked for labor or other purposes.

### II.4 HARASSMENT

We all have the right to be treated with respect and courtesy, and the duty to treat others in the same manner.

- **Respect in the workplace.** The Group is committed to ensuring that the professional environment is free from any harassment, including any intimidation, any sexual advances, threats and any act of violence.
- **Zero tolerance.** We do not tolerate any form of harassment, violence, or any act that would make the workplace threatening. This includes any attitude, situation or behavior that could be qualified as harassment. Any violation of these rules may result in disciplinary sanctions.



*SHARE YOUR CONCERNS AND TALK ABOUT IT OPENLY: If you are facing a problem regarding **harassment**, do not keep it to yourself. Discuss it with your manager or human resources manager who will help you.*

### II.5 THE DIALOGUE

Effective communication is an essential condition for maintaining a culture of openness and inclusion

- **The dialogue.** Our Values of Respect and Trust encourage us to work together and recognize the importance of open dialogue. We strongly encourage this communication through team meetings, teleconferences, or annual employee surveys which allow us to freely express our opinion within our subsidiaries.
- **Constructive and open relations with employees** — Through works councils, the Group offers another opportunity for dialogue. At the local level, we encourage open dialogue with employee representatives and other representative bodies, and we respect the processes outlined for by the various local laws, regulations and conventions.



*SHARE YOUR CONCERNS AND TALK ABOUT IT OPENLY: If you are facing a problem regarding the **culture of openness and dialogue**, do not keep it to yourself. Discuss it with your manager or human resources manager who will help you.*

## Ensuring the Quality of our products

The quality and performance of our products are our priority, in order to meet the needs of our various glassmaking clients around the world.

The quality management system implemented at Rondot group has established strong trust with our partners and indirectly with their clients.

We integrate quality requirements into all products in our daily operations at every level of the company.

Thus, at all stages of the design, development, production and marketing, we are committed to complying with the laws and regulations, as well as in terms of research, development, manufacturing, quality, and safety.

Rondot Group ensures that all its stakeholders are informed in a clear and transparent manner as part of responsible communication approach, in order to continue developing high-quality products and providing high-performing services to its clients.

Rondot Group has established a genuine Corporate Social Responsibility (CSR) approach that aims for sustainable balance considering the 3 pillars (social, environmental, and economic), through concrete actions, at all levels of the company.

## III. A RESPONSIBLE GROUP: INTEGRITY IN BUSINESS

Our Group is committed to behaving responsibly and with integrity in all its activities.

### III.1 FAIR COMPETITION

The Group competes vigorously but fairly for any commercial opportunity. Most countries where we operate have competition laws and business regulations aimed at protecting competition. The Group is committed to adhering to the laws and regulations applicable in the countries where it operates.

The basic rules. Although competition legislation (sometimes called “antitrust” in some countries) varies from country to country, certain practices are commonly adopted:

- Prohibited agreements and practices. Agreements (written or verbal) to fix prices, allocate customers or markets, coordinate bids, establish boycotts or exclude competitors are generally not permitted. Practices between companies that have the same effect or objective as these agreements are also prohibited.
- Abuse of dominant position. Major players in certain markets sometimes have less flexibility in making certain decisions, such as having the right to refuse to deal with other companies or completing an acquisition.

Prohibited behaviors. With a competitor, we do not discuss or exchange information regarding prices, conditions of sale, market distribution (whether by geographic areas, type of products or other means), customer allocation, costs, profits or margins. We do not engage in any activity that could hinder competition.

Measure the consequences. Simply being accused of violating these laws can result in damaging consequences for the Group and its employees. The Group could face severe criminal and civil penalties or be obliged to pay significant settlement compensation. Likewise, some employees could be subjected to substantial fines or even prison sentences. Consult the experts. One of the roles of the Legal Department is to help you understand and comply with competition laws, which are complex. Do not hesitate to ask questions if you are unsure about the conduct of the Group, our business partners or our suppliers.

The Group provides us with a detailed Group Procedure on compliance with competition law legislation.



***SPEAK TO your line manager or legal department:*** if you are facing a problem regarding **fair competition**, do not keep it to yourself. You should address this issue directly with your line manager and/or legal department.

### III.2 CORRUPTION

Compliance. Corruption, and in particular influence peddling, is a criminal and civil offense in most of the countries in which we operate.

- Anti-corruption laws prohibit offering, promising or giving anything of value to a public official or any private individual to obtain an undue advantage, such as inciting them to act in a favorable manner or avoid acting in a way that would be unfavorable to the Group or its clients.
- Anti-corruption laws broadly define the term “public official”. This includes employees of companies that are partially owned by a public legal entity, as well as employees of political parties and candidates for political office.
- It is also prohibited to ask a third party to make or authorize such as offers, promises or payments.
- Finally, it is prohibited to receive any valuable things from a person who could influence or be perceived as influencing the Group or its clients.

Commissions. In our business activities, we must not tolerate the payment of any commission to third parties or accept any commission from any third party, unless expressly authorized by the Group.

Measure the consequences. Violating anti-corruption laws not only exposes the Group to civil and criminal sanctions; it may also expose any employee to civil and criminal penalties (especially prison sentences).

Zero tolerance. The Group does not tolerate any form of corruption, nor any act that could be perceived as such. Tolerating corruption is unacceptable behavior for the company, anywhere in the world. Specific recommendations on this subject are provided in the Group's Anti-Corruption Policy.



*SPEAK TO YOUR MANAGER OR EXTERNAL LEGAL DEPARTMENT: If you are facing a problem related to corruption, do not keep it to yourself. You must address this problem directly with a lawyer from the Legal Department.*

### III.3 CONFLICT OF INTEREST

Loyalty and good faith. Each employee of the Group is bound by a duty of loyalty and the obligation to act in good faith.

Conflict of interest. A potential conflict of interest arises when we have conflicting interests at the same time. Thus, when a personal interest conflicts with the interests of the Group, we risk failing in our duty of loyalty. This is the case whenever the possibility of personal gain, direct or indirect, influences or could influence a decision related to our professional activity. Therefore, we must avoid situations where our individual interests may come into conflict with those of the Group.

### III.4 INSIDER TRADING

We must exercise extreme caution when considering trading in the shares of the Group, its clients, business partners and suppliers. It is prohibited to disclose or use inside information for transactions.

#### **Fight against corruption**

Corruption, in all its forms, is strictly prohibited within RONDOT GROUP. Corruption is identified as any abusive use of position or power to obtain an illegitimate or undue advantage, whether through practices such as accounting fraud, money laundering, bribery, embezzlement, conflict of interest, abuse of power, or any other action in violation of laws and ethical standards. RONDOT GROUP's commitment to combating corruption is demonstrated through the implementation of preventive measures, detection mechanisms, and corrective practices to prevent, detect and address any corrupt behavior or practices.

#### **Fight against anti-competitive practices**

The RONDOT GROUP Company is firmly committed to all anti-competitive practices which distort competition in the market. This includes actions such as price-fixing

agreements, abuse of dominant position, unlawful cartels, excessive concentrations, dumping practices and tied sales. The objective is to promote values and exemplary behaviors to ensure strict compliance with competition rules. This ethical approach promotes free and fair competitive operation of the economy, for the benefit of consumers and all market players.

### **Manage information security**

Information security is at the heart of concerns at RONDOT GROUP. It consists of protecting the company's data and IT systems against all possible threats, whether internal or external. The Company's commitment to information security aims to ensure the confidentiality, integrity and availability of company information, preventing unauthorized access, alteration or loss of data, as well as downtime. unforeseen IT systems. Overall, the aim is to protect RONDOT GROUP's sensitive information, including customer data, financial information and intellectual property.

### **Demonstrate transparency**

Ensuring reliable communication is key to maintaining the trust of our investors and partners. We are committed to faithfully reflecting our commercial or financial transactions in our accounting documents.

Rondot Group is dedicated to providing accurate, sincere and regular information. The fairness of the accounts allows the Group to base its decisions on comprehensive, precise and reliable information.

## **III.5 APPLICATION OF THE ETHICAL CHARTER**

### **Scope**

Within the RONDOT GROUP Company, the application of the ethics & Values charter is based on the responsibility of Management; we require them, during the annual review, to express the importance of their commitment to this charter.

These provisions apply directly and personally to all managers and employees of the Group, as well as to any person likely to engage or represent the Company, regardless of the environment or country in which they operate.

Managers and employees will ensure that these provisions are applied as much as possible by every third party in business relations with the company.

### **Deployment**

The Company undertakes to provide assistance to each concerned individual. Any manager or employee has the right to seek advice from their hierarchical authority to understand and comply with their obligations. The Company also guarantees the confidentiality of this process, fostering an environment conducive to the correct application of the Code.

## **Possible penalties**

Disciplinary actions, including revocation, dismissal, or termination of contractual relationships, will be taken against managers or employees of the Company who violate this Code. Managers who have evidently neglected oversight and monitoring will also be held responsible for such violations.

## **IV. A RESPONSIBLE GROUP: INTEGRITY IN BUSINESS**

### **IV.1 PREVENTION AND PROHIBITION OF ACTIVE & PASSIVE CORRUPTION**

#### **Active corruption and similar behaviors**

The Company categorically prohibits any act of corruption towards a public official, a company or an individual, as well as any similar behavior, in particular influence peddling.

In general, any behavior aimed at obtaining a favor from a third party in exchange for an illicit, promised, granted, or assumed advantage, is strictly prohibited.

The following are specifically prohibited under corruption:

- “Facilitation payments,” which are illicit or hidden payments made to secure or expedite an administrative process, even if the purpose is legitimate.
- Acts of favoritism consist of granting favors to a third party (such as an employment or supply contract) without proven economic justification or outside the scope of social or humanitarian actions undertaken by the Company as part of its sponsorship or philanthropy activities.

#### **Submission and procurement**

Any action aimed at unduly obtaining information from the buyer outside the regulatory frameworks, or gaining an unjustified advantage, is strictly prohibited. Likewise, any action aimed at restricting competition, including an illicit agreement with one or more candidates, is forbidden.

#### **Political activities and contributions**

The Company prohibits any political activity or contribution to a political party or a candidate for election. No manager, employee or third party may engage the Company or use its resources in such activities or contributions. This includes any membership, benefit, or donation to a political organization or individual involved in a local or national political campaign.

### **Gifts and invitations offered to third parties (clients, suppliers, partners, public authorities, etc.)**

Managers, employees and third parties acting on behalf of the Company may offer gifts or invitations to business partners, in compliance with national and international regulations. These offers must be in the interest of the Company, within the limits of their duties and delegations, to an identified and known person, clearly indicating that the Company is the initiator.

It is essential to exercise discernment by considering the business circumstances justifying the gift or invitation, as well as the position of the recipient.

Gifts or invitations must be modest in nature and of reasonable value. They must not influence decisions related to the Company. Managers and employees must ensure compliance with local laws and regulations, especially when the recipient holds a public or elected office.

The Company strictly prohibits the offering of gifts or invitations in conditions intended to conceal their existence or contravene decency, including in a financial or quasi-financial form (cash, gift, checks, travel coupons or negotiable property, loans, etc.).

### **Passive bribery**

The Company strictly prohibits its managers, employees, and third parties acting on its behalf or on its name from any form of passive corruption. This includes the solicitation or acceptance of an illicit or hidden advantage, regardless of its nature or amount, in exchange for a favorable act by the Company or a third party.

### **Conflicts of interest**

No decision taken on behalf of the Company must be tainted by a conflict of interest, whether apparent or real. Conflicts may arise when the personal interests (pecuniary, family) of a manager, employee, or third party acting on its behalf are potentially affected by a matter handled within their duties in company.

Anyone who may be in such a situation must immediately inform their line manager in writing and refrain from any action until explicit authorization is obtained, if necessary, under certain conditions. When a manager or senior executive is involved, authorization can only be issued after formal consultation with the President of the Company.

In situations requiring confidentiality, the concerned person may directly consult their Human Resources Director. The Company commits to strictly confidentially examine the matter and provide support to resolve the conflict situation while minimizing harm to the interests of the Company and the concerned person.

### **Gifts and invitations received**

Managers, employees, and third parties acting on behalf of the Company may receive gifts or invitations from business partners, subject to the rules below.

The Company strictly prohibits:

- Any solicitation of gifts or invitations.
- Any gift or invitation received secretly or from an unknown or unidentified person.
- Any gift or invitation in cash or quasi-cash (gift vouchers, negotiable items).
- Any gift or invitation violating applicable local regulations (in terms of amount, nature, origin, or recipient).
- Any gift or invitation not in accordance with decorum.

Gifts and invitations can only be accepted if they are of reasonable value and nature given the circumstances and the person offering or receiving them. They must be publicly acknowledged and respect the limits set within this Code and, where applicable, the relevant legal rules. Line managers can set indicative or mandatory thresholds, under the authority of their hierarchy and with the agreement of the legal department.

Any person receiving gifts or invitations likely to raise questions must immediately inform their line manager and, if necessary, the legal department. Any gift or invitation not complying with the stated rules must be refused, and if it is materially or reasonably impossible to return it, the legal department will examine the measures to be taken with the hierarchy.

## IV.2 OTHER RISK SITUATIONS SUBJECT TO SPECIAL RULES

### **Sponsorship and patronage**

Sponsorship and patronage actions include financial or in-kind support for non-commercial purposes, such as philanthropic, humanitarian, social, cultural, etc. These actions may only be undertaken in the name of or on behalf of the Company within the strict frameworks defined by its internal policies and procedures, and they generally require prior authorization.

They must exclusively aim to promote the brand or image of the Company, and they must be conducted with legitimate organizations whose ethical reputation is indisputable.

The Company's managers and employees are required to scrupulously ensure that these sponsorship and patronage operations cannot be unduly exploited for the benefit of third-party personal interests, particularly those of individuals holding public office or clearly candidates or potential candidates for such office.

In case of doubt, the operation must be immediately stopped, and the compliance officer must be informed.

### **Intermediaries, suppliers and partners**

The Company ensures that the activities of its professional partners (clients, suppliers, service providers, intermediaries, etc.) does not constitute a risk for it, particularly in

the case of non-compliance by these partners with international and national regulations. and recognized best practices in the prevention of corruption and related behaviors.

In this context, the Company's managers and employees must guarantee that each business relationship with one of these partners undergoes a prior and reasonable assessment, especially regarding risks linked to corruption. and related behaviors.

The agreements concluded with these partners must include specific provisions requiring compliance with best practices in this area and stipulating that proven non-compliance with these standards by the third party may result in an immediate termination of relations.

It is the responsibility of the business relationship manager to ensure the integrity of the selected partners in these matters. In case of doubt, it must be reported immediately to manager and the legal department so that the Company can initiate an evaluation procedure.

### **Accounting and financial control rules**

At RONDOT GROUP, rigorous accounting and financial control standards are maintained to ensure the integrity of operations. The procedures in place aim to prevent any misuse of the company's accounting records, particularly to conceal illicit activities such as corruption or influence peddling.

Any payment or benefit granted on behalf of the Company is subject to strict criteria. It must have a lawful and clearly defined objective, identified beneficiaries and strictly comply with international legislation in force, particularly with regard to sanctions, embargoes, money laundering and terrorism financing.

The Group requires that all payments are recorded correctly in accounting and follow established validation and approval processes. Hidden payments or attempts to conceal the true nature of the payment are strictly prohibited.

In addition, the Group insists on compliance with laws and regulations by payment recipients. The payment terms must in no way circumvent these legal requirements. Unless specifically approved, payments must be made in the country of the service provider or in the country where the service is rendered.

It is also ensured that all contracts concluded with commercial intermediaries are previously reviewed and approved in advance by the legal and financial departments, thus ensuring transparency and compliance of transactions.

RONDOT GROUP is therefore continually committed to maintaining the highest standards in accounting and financial control, thereby strengthening stakeholder confidence and preserving the company's reputation for integrity and responsibility.

## **Representation of interests (lobbying)**

Lobbying involves representing interests before any public authority to promote the Company's image, products, and services. Whether the representative of interest is a manager or employee of the Company or a third party acting on its behalf under a contractual mission, its integrity must be assessed according to the terms provided for in section (c) below, if applicable. Regardless of the designation of this interest representation activity, it must be carried out in compliance with ethics, local regulations and this Code, strictly avoiding any risk of influence peddling.

Interest representatives must clearly indicate, to the individuals and third parties, that they are acting on behalf of the Company and avoid any confusion with other activities that may be conducted privately, professionally or as a part of mandate (associative, political or union).

Regarding the people met and their direct entourage, the interest representatives acting on behalf of the Company must refrain from any attempt to obtain information fraudulently, from deliberately communicating false or misleading information.

In some countries or with certain national or international individuals or institutions, specific regulations impose obligations on this interest representation activity, particularly regarding the persons carrying out the mission, the modalities of the mission, or the persons met (notably parliamentarians and elected officials). It is the responsibility of who responsible for the mission of interest representation (whether carried out by a manager or employee of the Company or by a third party) to verify whether the mission is subject to such regulations and, where applicable, to strictly ensure compliance with its terms.

## **IV.3 PREVENTION AND PROHIBITION OF ANTI-COMPETITIVE PRACTICES**

RONDOT GROUP is firmly positioned against anti-competitive practices, making prevention a fundamental principle. In its relations with various stakeholders such as customers, suppliers, service providers, and intermediaries, it reaffirms its commitment to strict ethical standards, aligned with international and national standards, as well as best practices in terms of fair competition.

### **Illicit Agreements**

An illegal agreement is defined as a secret arrangement between competing companies aimed at restricting competition by distorting market mechanisms, such as agreeing on prices or limiting production.

The Company strictly prohibits any form of illicit agreement with competitors, whether in price fixing, market sharing, or coordinating commercial strategies. Employees, managers and third parties acting on its behalf are expressly forbidden from participating in such practices which distort free competition. Collusion with competitors to limit competition is a fundamental violation of business ethics.

## **Unfair discrimination**

Unfair discrimination includes practices such as the granting of unjustified preferential prices or establishing unbalanced contractual conditions, which unfairly favor certain players in the market to the detriment of others.

The Company firmly prohibits any unfair discrimination against its business partners, customers, or competitors. The company strives to maintain fair and respectful relationships, thereby fostering a balanced business ecosystem.

## **Disinformation and manipulation**

Disinformation and manipulation encompass practices such as spreading false information or manipulating market conditions to mislead market players, thereby compromising the transparency and integrity of transactions.

The RONDOT GROUP Company prohibits misinformation and manipulation in all its commercial interactions. Any misleading communication is contrary to the company's ethical principles and is expressly forbidden.

## **Exclusive practices**

The Company is committed to not engaging in exclusive business practices that unduly limit competition. Exclusive practices include agreements that restrict competitors' market access or create discriminatory conditions in favor of certain players. The Company promotes the market diversity, thus stimulating fair competition.

## **Collaboration with Competition Authorities**

The Company promotes close collaboration with competition authorities, thereby ensuring rigorous compliance with applicable antitrust laws. This approach aims to strengthen transparency and ethics in all business practices, underscoring the company's commitment to strict anti-competitive standards.

## **Transparency in business practices**

The company is also committed to maintaining total transparency in its business practices. Information relating to partner evaluations, in the context of preventing anticompetitive practices, is accessible to the relevant employees, thus ensuring collective responsibility.

In addition, each transaction is subject to high standards of documentation, ensuring precise traceability. This rigorous approach reinforces the trust among trading partners and demonstrates a commitment to transparent business practices.

## **Ethical clauses in agreements**

The RONDOT GROUP Company firmly believes that mutual respect strengthens the entire commercial fabric, promoting innovation, continuous improvement and customer satisfaction. In this regard, managers and employees, aware of their pivotal role, have the responsibility of concluding agreements with partners which are not simple formalities, but ethical foundations incorporating binding clauses that go beyond the reminder of standards.

These clauses clearly state that any breach constitutes a legitimate reason to immediately terminate the commercial relationship. No contractual commitment can be made before confirmation of the partner by the authorized manager, except in cases of absolute urgency and after validation by the legal department. This thoughtful approach ensures an informed selection of partners, thereby consolidating a stance against anti-competitive practices.

## **IV.4 INFORMATION AND DATA MANAGEMENT**

The company recognizes the critical importance of information security in its daily operations. Confidentiality, integrity and availability of information are essential elements to ensure stakeholder trust and maintain the company's reputation.

### **Access management**

All company employees have appropriate access to information systems based on their job responsibilities. Access management is regularly evaluated and updated to ensure that only authorized individuals have access to sensitive information. Employees who leave the company or change positions have their unnecessary access privileges promptly revoked.

### **Customer and partner data protection**

The company is committed to protecting the data of its customers, partners and all other stakeholders. Confidential information is handled with the greatest caution and access is limited to individuals necessary for its use in their respective roles. Data collection, storage, and processing are conducted in compliance with applicable data protection laws and regulations.

The company's confidential information includes, but is not limited to, customer data, strategic plans, financial information, trade secrets and any proprietary information that could have significant value for the Company.

Access to confidential information is limited to employees with an operational necessity and who have been authorized by the management team. All access must be justified and recorded. Employees are required to maintain confidentiality even after the termination of their employment with the RONDOT GROUP Company. Confidentiality obligations survive the end of the employment contract.

## **Security incident management**

In the event of a security incident, RONDOT GROUP responds quickly to mitigate risks and minimize consequences. A security incident management plan is developed and regularly tested to ensure an effective response when necessary. Employees are informed of the procedures to follow in case of a security incident, and any suspicion of a breach of information security must be reported immediately.

## **Responsible use of technologies**

RONDOT GROUP employees are required to use information technology responsibly. This includes the appropriate use of equipment, software and online services. Unauthorized downloads, installation of unapproved software and any other activities that may compromise information security are strictly prohibited.

We only collect data necessary for our legitimate business activities. Employees must comply with data protection laws and regulations when collecting, processing and storing personal data. Employees are responsible for maintaining the accuracy of the data. Inaccurate data must be corrected as soon as possible.

Sharing data with third parties is permitted only after careful assessment of business necessity and with appropriate data protection safeguards.

## **Physical access control**

In addition to electronic measures, the Company implements physical access controls to protect premises where sensitive information is processed and stored. Employees are responsible for the security of physical access and must report any anomalies or suspicious situations.

The Company is committed to maintaining a secure environment for its information, recognizing that information security is a shared responsibility between the Company and its employees. By adhering to these guidelines, members of the company contribute to ensuring its sustainability and reputation.

## **Respect for intellectual property rights**

Intellectual property rights include patents, trademarks, copyrights and any other rights arising from creativity and innovation.

Employees may only use intellectual property rights if they have been authorized to do so. Any unauthorized use is strictly prohibited. Employees are required to respect the intellectual property rights of others and report any unauthorized use or suspected violation.

The Company considers responsible information and data management essential for protecting its interests, those of its clients and partners, and for complying with ethical and legal standards. Any employee failing to adhere to these principles will be subject to disciplinary action.

## **V.COMPLIANCE AND REPORTING ETHICAL VIOLATIONS**

### **Fight against harassment and discrimination**

Our company is committed to creating a safe, inclusive and respectful work environment for all employees, without exception. We strongly condemn all forms of harassment and discrimination based on race, gender, sexual orientation, religion, age, disability, ethnic origin or any other characteristic protected by law.

Any behavior considered as harassment or discrimination, including derogatory remarks, threats, unwanted sexual advances or any other form of intimidation, is strictly prohibited and will be treated with the utmost severity.

We encourage all employees to immediately report any inappropriate conduct to their manager or to the human resources department or via the whistleblowing procedure. Complaints will be handled confidentially and effectively to ensure justice, without fear of retaliation.

Our goal is to maintain a workplace where everyone feels valued and respected. We are committed to taking all necessary measures to prevent, identify and eliminate inappropriate behavior within our organization.

### **V.1 WHISTLEBLOWING PROCEDURE AND WHISTLEBLOWERS PROTECTION**

Ethics, transparency and trust are key values within RONDOT GROUP. The management team actively encourages all members of the organization, including managers, employees, external collaborators, temporary workers, to report any suspected violation of our ethical rules.

The company commits to acting promptly by launching appropriate audits to verify the accuracy of the allegations and to put an end to any wrongful practices if they are proven.

The confidentiality of information relating to alerts, including that of the whistleblower, is guaranteed, with the possibility of remaining anonymous when necessary.

For RONDOT GROUP, a zero-tolerance policy is applied towards retaliation against whistleblowers. No disciplinary or professional action will be taken against a person making a report in good faith, even if the facts reported prove to be inaccurate.

Furthermore, in cases where the whistleblower's responsibility may be involved, the company commits to considering the report and working with the employee to resolve the matter in a fair and just manner.

However, all members of the company are reminded that any misuse of the whistleblowing procedure, particularly through malicious or bad-faith reports, will be severely punished.

Cases of defamation, malice or clearly false or repeated accusations are taken seriously, and the company reserves the right to apply disciplinary measures or even legal action in accordance with the law. Trust and integrity are fundamental values for RONDOT GROUP, preserved at all costs.

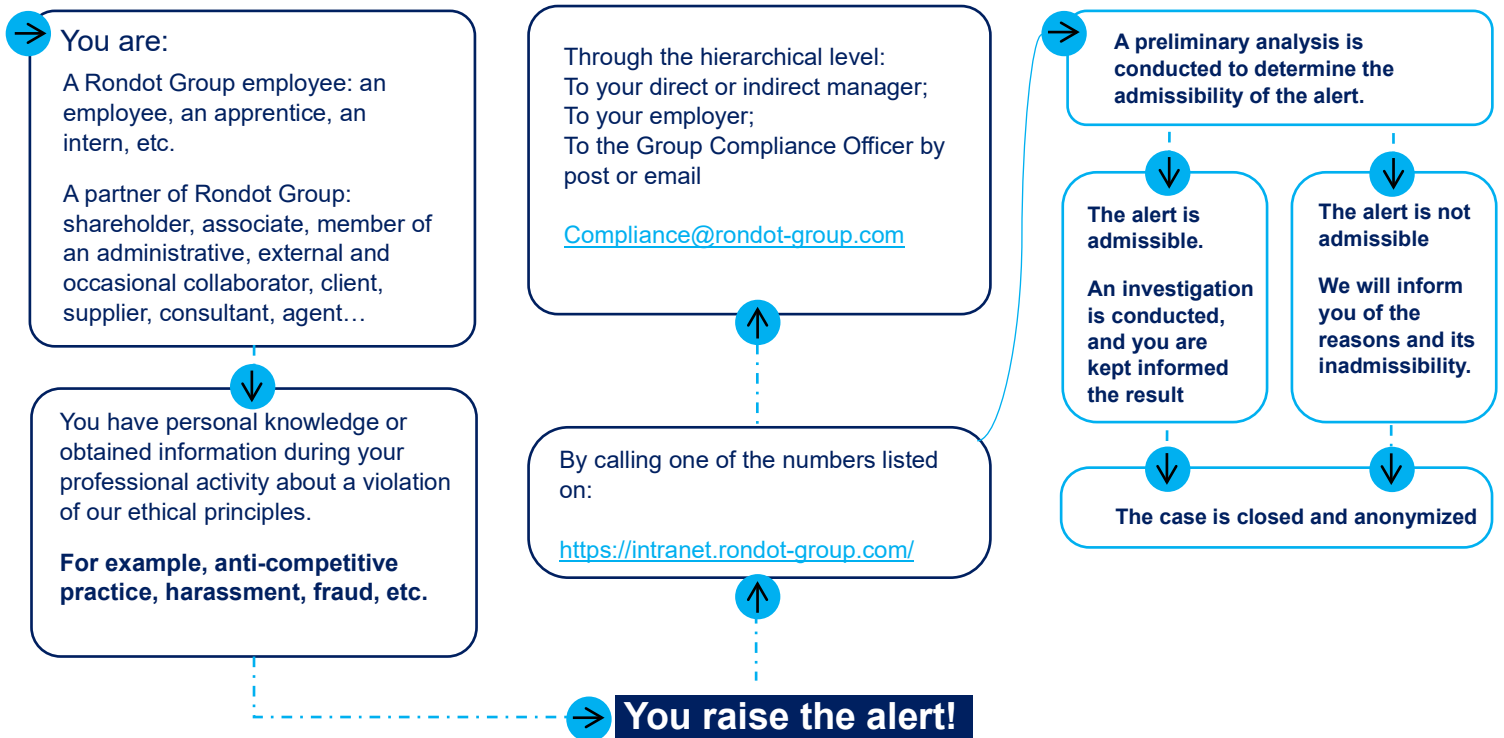
The Company's employees are invited to read and apply the provisions of the RONDOT GROUP internal whistleblowing procedure, which applies to all employees, on permanent or fixed-term contracts, full-time or part-time, to interns, to workers made available to the company by a temporary employment company or by third parties and to employees of outside companies working on behalf of the company.

## V.2 PROCEDURES FOR RESOLVING ETHICAL VIOLATIONS

In the event of a proven violation of the principles set out in the Code of Ethics, appropriate procedures will be implemented to remedy the situation, which may include disciplinary sanctions, corrective actions or, in serious cases, termination of employment.

### ALERT SOUND

*We count on each one of you to raise the alarm if our ethical principles are violated.*



### AS A WHISTLEBLOWER, YOU ARE PROTECTED!

RONDOT GROUP does not tolerate any retaliation if the alert is made in good faith.

The alert can be made anonymously. However, we encourage you not to choose this option which makes the processing of the alert less effective. Regardless of your choice, your identity and that of the individuals targeted by the alert are kept strictly confidential.

All data collected through the alert system is protected. You have the right to access, correct, or object to the processing of this data.

## VI. IMPLEMENTATION AND REVISION OF THE ETHICAL CODE

### IV.1 STAKEHOLDER INVOLVEMENT

The Code of Ethics is integrated into all aspects of RONDOT GROUP's corporate culture. The management team is committed to actively promoting ethical principles within the organization.

#### **Responsibility of managers**

The Company's managers are required to set an example in terms of professional ethics. They are responsible for promoting an organizational culture consistent with the Code of Ethics and ensuring that all employees understand and respect these principles.

#### **Employees**

Continuing its commitment to ethical excellence, the Company recognizes the importance of regular awareness raising among its employees. Training programs focused on understanding ethical issues, are implemented. This aims to strengthen the ethical culture within the organization, allowing each member to actively contribute to the prevention of anti-competitive practices.

#### **External stakeholders**

The Company goes beyond its internal boundaries by encouraging its external partners to adhere to the same ethical standards. This approach fosters a business ecosystem based on shared principles, strengthening mutual trust and contributing to a more ethical and sustainable business environment.

### IV.2 REGULAR COMPLIANCE ASSESSMENT, REVIEW AND ADAPTATION

#### **Continuous improvement**

Finally, the RONDOT GROUP Company considers continuous improvement as a major focus of its ethical policy. Periodic reviews of assessment procedures are carried out, integrating feedback to continually refine methods for detecting and preventing anti-competitive practices. This iterative approach aims to ensure that the company remains at the forefront of ethical best practices, adapting its policies according to the changing business landscape and new trends in anti-competitive practices.

#### **Periodic review**

The Code of Ethics is reviewed regularly to ensure that it remains aligned with the core values of the RONDOT GROUP Company and current ethical standards. Revisions are carried out by the CSR department and the Legal department, and require the approval of the CEO, Raphael Constantin.

Employee feedback, legal developments and best practices are considered during these reviews. The results of these evaluations are used to make continuous improvements.

### **Adaptation to legal and ethical changes**

The Company recognizes the importance of remaining in compliance with evolving laws and regulations, as well as emerging ethical standards in our industry and society. As part of this commitment, the Ethical Code is subject to regular review to reflect any significant changes in the legal or ethical landscape. A clear and systematic procedure, aligned with best practices, is established to identify and integrate these updates in a timely manner.

In accordance with the above whistleblowing procedure, all employees are encouraged to report any violations of existing ethics rules or raise questions regarding compliance with new laws or standards. These alerts will be handled confidentially and quickly, allowing the company to assess the need to amend the Code of Ethics accordingly.

### **Communicating updates to employees**

The Company places a high value on transparency and open communication regarding the company's ethical standards. Therefore, any updates to the Ethical Code are communicated transparently to all employees. This communication is done through various channels, such as internal announcements, emails, or postings on internal communication platforms.

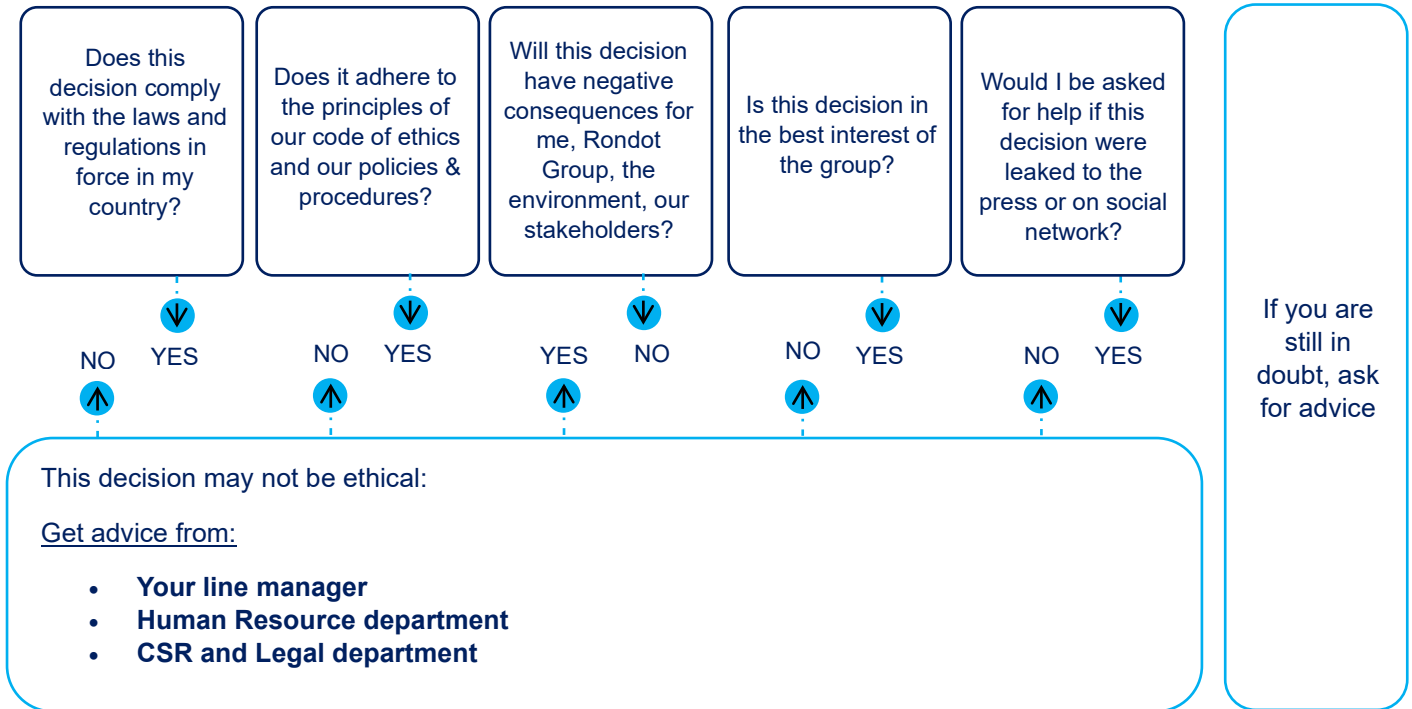
To ensure a clear and thorough understanding of the new ethical standards, additional training sessions may be organized. These sessions aim to provide employees with the necessary information to understand the changes, emphasize the importance of these updates, and address any questions that may arise. By encouraging active participation, the Company strives to ensure that every member is well-informed about the prevailing ethical standards, thereby fostering an organizational culture imbued with integrity and responsibility.

## HOW TO USE THIS ETHICAL CODE:

### **Ask yourself the right questions:**

*We cannot address all risk situations in this code.*

*If have any doubts about the ethical nature of a decision, ask yourself the following questions:*



## CONCLUSION

### **Ongoing commitment to ethics**

At RONDOT GROUP, we consider our Code of Ethics to be an integral part of our corporate culture. This commitment must guide our daily actions, strengthen our reputation and help build trust with our employees, our customers, our partners and the community.

### **Monitoring**

The Company reserves the right, at any time, to examine in detail any transaction carried out in its name or under its responsibility. Individuals placed under its authority, as well as third parties acting on its behalf, are required to cooperate fully with the company and its external advisors during such reviews. Any lack of cooperation may result in disciplinary or contractual action.

## Signature of adherence to the Code of Ethics

We invite each member of the team to read this Code of Ethics carefully and to adhere to it. By signing this declaration, each employee affirms their commitment to these ethical principles and their understanding of the importance of maintaining an ethical corporate culture.

By committing together to regulatory and human-respectful practices, we shape a work environment where integrity, respect and responsibility are essential pillars. We firmly believe that these principles are the key to our sustainable success.

Together, let's continue to build a company where our values are at the heart of all our actions, and where we grow and prosper in a sustainable, respectful and exemplary way.

**Employee Name:**

**Entity:**

**Signature with the words:** read and approved

**Date :**

April 2, 2024

Champagne at Mont d'Or,

The direction



**RONDOT GROUP**  
SAS au capital de 31.405.000€  
9, Rue Jean-Blysée Dupuy  
69410 Champagne au Mont d'Or France  
RCS LYON 879 104 396

## GLOSSARY OF THE ETHICAL CODE

**Abuse of dominant position:** Exploitation by a company of its privileged position to eliminate competition, restrict competitors' access, or manipulate market conditions, thereby undermining the fair operation of the market.

**Beneficial owners:** The beneficial owner refers to the natural or legal person who directly or indirectly controlling assets and for whom the activities of the company are carried out.

**Gift:** A gift is any benefit, good or service that can be valued in money transferred voluntarily and free of charge directly or indirectly. This may include cash or cash equivalents, items, gift vouchers, movable or immovable property, etc.

**Ethics clauses:** Binding clauses integrated into commercial agreements, going beyond the reminder of standards, stipulating that any breach constitutes a legitimate reason to immediately terminate the commercial relationship.

**Public procurement:** The term "public procurement" refers to public contracts, concession contracts and other contracts intended to satisfy a need in the general interest.

**Similar behavior:** Similar behavior refers to all acts contrary to entity such as, for example, influence peddling, extortion, illegal taking of interests, misappropriation of public funds and/or favoritism.

**Conflict of interest:** Conflict of interest refers to a situation in which the personal interests of an internal or external employee conflict with those of the Company. These may be pecuniary, professional, family or other interests.

**Active bribery (corruption):** Active corruption refers to the act of offering, promising or proposing directly or indirectly a payment or an advantage to a public or private individual in return for a promise, a waiver or a favorable act.

**Passive bribery (corruption):** Passive corruption refers to the act of accepting or receiving, directly or indirectly, a payment or an advantage from a public or private individual in return for a promise, a waiver or a favorable act.

**Unfair discrimination:** Practices such as granting unjustified preferential rates or establishing unbalanced contractual conditions, unfairly favoring certain players in the market over others.

**Intellectual property rights:** Patents, trademarks, copyrights and other rights resulting from creativity and innovation.

**Dumping:** Selling products at artificially low prices with the aim of harming competition, creating unfair market conditions.

**Disinformation:** Deliberate dissemination of false information to mislead market participants, thereby compromising the transparency and integrity of transactions.

**Illicit Agreements:** Secret agreement between competing companies aimed at restricting competition by distorting market mechanisms, for example by agreeing on prices or limiting production.

**Suppliers:** A supplier or subcontractor is an individual or entity providing goods or services to the company.

**Access management:** Regular assessment and updating of access rights to information systems based on professional responsibilities.

**Security Incident:** A breach or threat of a breach of information security, requiring a rapid response to mitigate risks and minimize consequences.

**Intermediaries:** An intermediary refers to an individual or entity involved in commercial negotiations to facilitate or enable the conclusion of one or more contracts.

**Invitation:** An invitation is a proposal to participate in an event, a conference, a trip, a dinner, etc.

**Patronage:** Patronage consists of supporting organizations or works of general interest (foundations, public utility associations, etc.) through a donation of a sum of money, movable or immovable property, or a loan.

**Routine operation:** Current operation refers to transactions or tasks relating to the company's activities performed periodically.

**Sponsorship:** Sponsorship involves providing material support for an educational, cultural, scientific, social, humanitarian or sporting project and helping to promote the image of the company.

**Partners:** Partners are individuals or entities with which the company establishes a synergy to carry out commercial operations under one or more contracts.

**Politically Exposed Person (PEP):** A politically exposed person is an individual who holds or has held a public function or is closely associated with such a person.

**Anti-competitive practices:** Anti-competitive practices refer to any act intended to restrict or distort competition and thus circumvent the rules of transparency, loyalty and equity between competitors. These may include express or tacit agreements, coordinated actions, or abuse of a dominant position to eliminate other competitors...

**Exclusive practices:** Exclusive practices involve agreements that restrict competitors' access to the market or create discriminatory conditions favoring certain players, thereby unduly limiting competition.

**Assessment procedure:** An assessment procedure refers to the Company's regular control and reasonable verification measures for the identification of the third party and the risk to which the Company is exposed by engaging in business relationship with these third parties.

**Data protection:** Measures to protect the data of clients, partners and other stakeholders, in accordance with applicable data protection laws.

**Third parties:** The term "third parties" refers to clients, suppliers, or other partners of the company, as well as any other individuals or entities, whether public or private,

external to the company, regardless of whether there is a contractual link with the company.

**Influence peddling:** Influence peddling refers to the act of using or abusing one's actual or perceived influence to obtain distinctions, jobs, contracts, exemptions, or other benefits from a public authority (national or international).

**Tied selling:** An anti-competitive practice involving the bundling of two products or services in a way that creates unfair conditions in the market.