GROUPE CARSO

CODE OF ETHICS



This Code of Ethics is part of the Carso Group's anticorruption compliance programme, pursuant to the application of Article 17 of the French law of 9 December 2016 on 'Transparency, Combating Corruption and Modernising Economic Life', known as the 'Sapin II' act.

January 2025

Our commitments and ethical values



Founded more than 30 years ago, the Carso Group and its mission statement aim to benefit the quality of life and the environment. Our fundamental values, boldness, agility, commitment and integrity, guide our decisions and actions every day.

Our business in providing cutting edge analyses and services is based particularly on ethical values including integrity, impartiality and independence. These fundamental values strengthen trust between our Group, our customers, partners and society as a whole.

> Ethics are the essence of the Carso Group

Why have a Group Code of Ethics?

Our commitment to unimpeachable business practices is embodied in this Code of Ethics, which each of us is bound to follow to uphold our integrity and reputation.

The Code of Ethics sets out clear rules for conduct and behaviour applicable to all employees and aims to prevent situations that could tarnish our integrity. It is an essential tool for maintaining the trust of our customers, partners and the public.

> This Code of Ethics is a guide to making the right choices

In practice, how do we meet our commitments?

To meet our ethical commitments, every employee must be alert and conscientiously follow the rules described in this Code.

If in doubt or a complex position, it is vital to consult a line manager or the internal audit manager. Responsible use of the Group's resources, compliance with laws and regulations, and adopting fair business practices are essential requirements. Any act infringing laws or the rules of the Code of Ethics could result in disciplinary measures.

In the event of a presumed breach of the law or Code of Ethics, we encourage using internal alert systems. This procedure guarantees confidentiality and anonymity, so protecting whistleblowers from any form of reprisals.

> The purpose of the Code of Ethics is to guide you in your daily activities: read it carefully! If in doubt, ask your manager or internal audit for help immediately

Thierry Schietecatte
Chairman, Carso Group

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OUR ETHICAL PRINCIPLES



Introduction

This Code of Ethics **cancels and replaces** all other documents on the matter. It has been communicated to all employees by all available means.

The Code of Ethics is included in the internal rules of the Group's business units. It is communicated to all employees and is always provided to each new arrival by the Human Resources department.

Our ethical organisation

The Group Chairman, Thierry Schietecatte, as an officer and representative of the Carso Group, handles compliance matters and oversees implementation of the Code of Ethics within the Carso Group.
The Group Finance, Administration & Purchasing Director, Renaud Kaeppelin and the **Internal Audit Manager, Catherine Bonnet** are responsible for the Group Compliance programme, handle compliance and ethical matters and ensure the Group's Code of Ethics is correctly implemented. **Human Resources** are stakeholders in the implementation of ethics, particularly in combating harassment.



Renaud Kaeppelin



Catherine Bonnet

Each manager of an operational or functional unit is responsible for implementing the Code of Ethics within their scope of responsibility and is accountable to the member of the Executive Board to whom they report.

Each manager must therefore ensure that all the employees in their team have read the Code of Ethics, have clearly understood the rules and will illustrate their remarks with simple, practical examples, as necessary. The manager must also ensure that each employee in their team has fully understood the disciplinary measures that could be applied if the law and rules in this Code of Ethics are not followed.

Employees must read the Code of Ethics and apply it strictly; if in doubt, they can ask their manager questions. They must also take the ethics training courses offered within the stated time limits.

Implementing the Code of Ethics

The Code of Ethics **cannot be exhaustive** and cannot cover every situation that might arise, nor provide information about all the applicable laws. Nonetheless, it represents **a guide** allowing each employee to respond at any time in line with the high standards of ethical behaviour desired by Senior Management.

All Carso Group employees, without exception, must apply the following documents:

- This Code of Ethics
- The local Codes of Ethics of our foreign business units meeting local rules
- All internal procedures or policies mentioned in this Code of Ethics
- Any procedure, policy, principle or rule relating to ethical matters and combating corruption arising from the Code of Ethics

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Any Carso Group employee who does not obey the Code of Ethics may face disciplinary measures extending as far as dismissal.

To meet our ethical commitments, **each of us is involved at our own level.** We must **know and understand** the Group's ethical commitments, **take them on-board** and **spread them every day**, remain on the **look-out** for risky behaviour and **alert** to be better protected.

What are our key ethical principles?

The Code of Ethics is based on fundamental principles such as **integrity, impartiality, independence, transparency and responsibility.**

Every employee must conduct themselves honestly, report conflicts of interest and comply with current laws and regulations in the country where they live or work.

> We undertake to apply our Code of Ethics conscientiously, to act in line with our values of transparency, integrity, fairness and honesty, to obey the laws and regulations of the countries in which we operate and, lastly, to combat corruption

Who is the Code of Ethics intended for?

Our Code of Ethics is a **tool for raising awareness available to everyone**.

It applies **without exception to all the Group's employees**, including directors, employees and contractors, **throughout the world** and **at all levels of our organisation**.

This Code of Ethics may be supplemented by the provisions of the codes of ethics of foreign subsidiaries meeting local features and laws, but it will not be replaced under any circumstances.

Every decision must be taken in compliance with the applicable laws and this Code of Ethics. All employees must know and apply the Code of Ethics conscientiously.

Our external partners, suppliers, subcontractors and consultants, must follow the principles of our Code of Ethics summarised in ***the Code of Business Conduct with our commercial partners*** to be provided, as soon as it is implemented, at the time of any commercial relationship by the employees responsible for relations with these partners.

What to do if there is no law or regulation?

If laws or regulations do not exist, then the principles of integrity, transparency, honesty and fairness should guide the actions of Carso Group employees. **No Carso Group employee may breach these principles or Code of Ethics, even to benefit the Group's interests.** Performance targets must never be achieved by infringing laws, regulations or the Code of Ethics.

> Each decision must be assessed against these fundamental values
> Compliance is everyone's business

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What to do if a problem arises and how to ask yourself the right questions

Ask yourself the right questions

When you have to take a decision involving ethical issues, then **ask yourself the following questions**:

- Is it legal?
- Consult the Code of Ethics and procedures on the matter and ask yourself: does it comply with the principles and rules of our Code of Ethics or internal procedures?
- Would I be comfortable if the decision that I've taken were to be known to my teams or colleagues?
- Would I be comfortable explaining my decision in front of the authorities or my line management?

Seek advice

If the response is NO to one of these four questions, or if you're in doubt, then **first seek advice from**:

- **Your direct line manager**, who is **your first contact** for ethical matters
- If you're not comfortable discussing it with your direct line manager, you can talk about it with:
    - **your direct line manager's manager** or the **head of the teams involved**,
    - **The Human Resources manager** or **the internal audit manager**

Report the facts

Finally, you can **report the facts** to the internal audit manager **at any time**. To do so, use the **ETHICS internal alert system** and send an e-mail to ETHICS@groupecarso.com

All requests will be handled confidentially and anonymously subject to applicable law. External requests, complaints or comments regarding the Code of Ethics must be sent to the Group.

To find out about our alert procedure, refer to page 21

Other internal alert systems are also available to employees, particularly including:

- The online alert system for subsidiaries based in Italy
- Measures to combat harassment
- And any other system in place



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Key take-away

What you should do

Remain alert.

Ensure the independence and integrity of the Group's employees and commercial partners.

I apply the Code of Ethics and internal procedures conscientiously.

What's at stake

By acting outside the law or Code of Ethics, disciplinary measures and civil or even criminal penalties may be applied, both to the company and you yourself.

Ask for help

If approached or in doubt,
Refer to the Code of Ethics and internal procedure.
Seek advice from your direct line manager, or from another superior, or from the Human Resources manager, or from the internal audit manager.
Report any suspicion or confirmed breach.

OUR ETHICAL POLICIES AND RULES



Our policy on integrity and honesty

Integrity of our services, information and documents supplied

Our business activities must be conducted **professionally, independently and impartially.** Our work must be done honestly, closely following our approved methods and procedures, with reports accurately reflecting the results. Our processes and checks ensure the integrity of our services.

The information supplied in our reports must be accurate and verifiable. Each Carso Group employee is individually responsible for the accuracy of the information they provide and the documents they draft, particularly including test reports and certificates.

> We must supply high quality services honestly, independently, transparently and professionally

I undertake to	I refuse to
- Use and apply Carso Group procedures at all times and for all customers, without exception - Provide reliable and accurate results to customers - Follow approved standards and methods, even if the customer doesn't like it - Confirm the accuracy of data and report any suspicious behaviour, e.g. if a colleague manipulates data suspiciously, then I must report it immediately - Perform my tasks professionally, independently and impartially, and avoid any unfavourable situation	- Alter test results to satisfy a customer - Ignore the Group's operational and quality procedures - Bow to any pressure, incitement or internal or external influence encouraging me to alter or falsify test results - Take an incomplete, unrepresentative or fraudulent sample - Replace samples or data with others - Record any parameters incorrectly during the sampling or test phase - Select the best parts of the results - Conceal or ignore evidence of fraud or fraudulent conduct, such as on the pretext that it's one of my close colleagues

All these situations are given as examples and are not limiting in scope

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Our anti-fraud policy



The Carso Group is committed to combating fraud. All employees must **report** any suspected or proven act of fraud or embezzlement to the internal audit manager immediately. They may **use the ETHICS internal alert system**.

Fraud is a deliberate intended to trick someone else to obtain an unfair advantage, often financial, or to cause harm or loss.

Examples include tax, bank or insurance fraud by falsifying documents, concealing or manipulating information for personal profit.

Embezzlement is misuse of funds or assets entrusted for management, particularly including misappropriation of funds by a manager.

Report any act of fraud or embezzlement

I undertake to	I refuse to
- Implement and follow Carso Group rules and procedures to combat fraud and embezzlement *e.g. You are an accountant and a supplier sends an e-mail asking you to change their bank details. What should you do? Read the procedure on changing supplier bank details and apply it strictly. If there is no procedure, seek advice from your line manager or your superior's manager.* - Share measures to combat fraud with you whole team - Be alert for all types of frauds without limiting yourself to financial fraud - Report any suspected or proven act of fraud or embezzlement *e.g. you identify that a customer has not been invoiced for the last 50 tests that have performed. You alert your line manager, who will investigate it* *e.g. you work in customer follow-up and you notice that a customer has been granted a large number of apparently unjustified credit notes. What should you do? Check that these credit notes are justified and report the information to your line manager and the internal audit manager*	- Bypass measures implemented to combat fraud - Ignore fraudulent behaviour or embezzlement on the pretext that it's a close colleague or your superior - Conceal or ignore signs of fraud

All these situations are given as examples and are not limiting in scope

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Conflict of interests

A conflict of interests is a situation in which a person has to make a business decision or take action, but where your personal interests might influence your decision inappropriately. This means that your choices might not be impartial, as they are influenced by personal benefit that may be financial, relationship-based, etc., rather than the interest of the organisation or people it is supposed to serve.

Every employee must **avoid and prevent any situation in which their interests could interfere with those of the Carso Group**.



Every employee **must declare any potential or known conflict of interests** on the **ETHICS internal alert system, as well as other measures implemented within the business units**. All declarations will remain confidential and will be handled discreetly.

Every employee has a **duty** to do this **as soon as they join** the Group, overseen by Human Resources during the hiring process, for **any change in your situation.**

> I avoid any situation where my personal interests could affect my professional decisions

I undertake to	I refuse to
- Avoid any situation that may influence my judgement - Declare any potential conflict of interests on ETHICS *e.g. you declare any situation when one of your family or friends is involved in a decision* - Immediately declare your line manager, using the ETHICS internal alert system and on other measures implemented in the laboratories, if you find yourself with a potential or known conflict of interests specific to your job *e.g. you declare if you have a relationship with a customer company, or if you have invested in the shares of a competing company, a customer or a supplier* *e.g. your wife works for a competitor. You don't talk about your respective roles at home. Should you report it? Yes, you report it to your line manager and using the alert systems. Working for two competing companies within a couple is not a conflict of interests if you ensure the correct separation between your private and working lives. You're careful not to disclose information in your possession and to protect your company's confidential data.* *e.g. you want to co-opt your best friend or cousin into the company. Is this possible and should you declare it? Yes, it's possible as long as you follow the recruitment and co-opting process used by Human Resources and you are not the only decision-maker* *e.g. you declare if you have a family or close personal tie with someone under your line management*	- Take part in decisions where your personal interests are involved - Participate in the decision to commit a company where a member of your family is employed within warning senior management *e.g. your brother-in-law manages a bottling company and charges good prices. You work in the Purchasing department; can you, by yourself, agree a contract with him on behalf of the Carso Group? No. This supplier should follow the procedures of the Group's purchasing policy and, as applicable, should be incorporated in the tender process. You should not be involved in the choice of supplier. You should report it using the alert systems and to your line manager, who will take the necessary measures so as not to expose you to a delicate situation* - Accept a position as board member, director, manager or any other job of this type, in a company outside the Carso Group, without first obtaining agreement from the Chairman of the Carso Group - Buy directly or through a third party (including family) an investment in the shares of a competitive company, a customer or a supplier, without first obtaining agreement from the Chairman of the Carso Group

All these situations are given as examples and are not limiting in scope

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Combating corruption

What is corruption?

Reminder of the law

The French law of 9 December 2016 on '**Transparency**, **Combating Corruption** and **Modernising Modern Life**', known as the **Sapin II act**, defines measures to be implemented by French companies to combat corruption. It also specifies the scope and applicate date as well as penalties for non-compliance.

Note that all companies and groups of companies, for all French or foreign subsidiaries, with the parent company having its registered office in France, meeting the following two cumulative criteria must apply the measures of the Sapin II act no later than 1 June 2017:

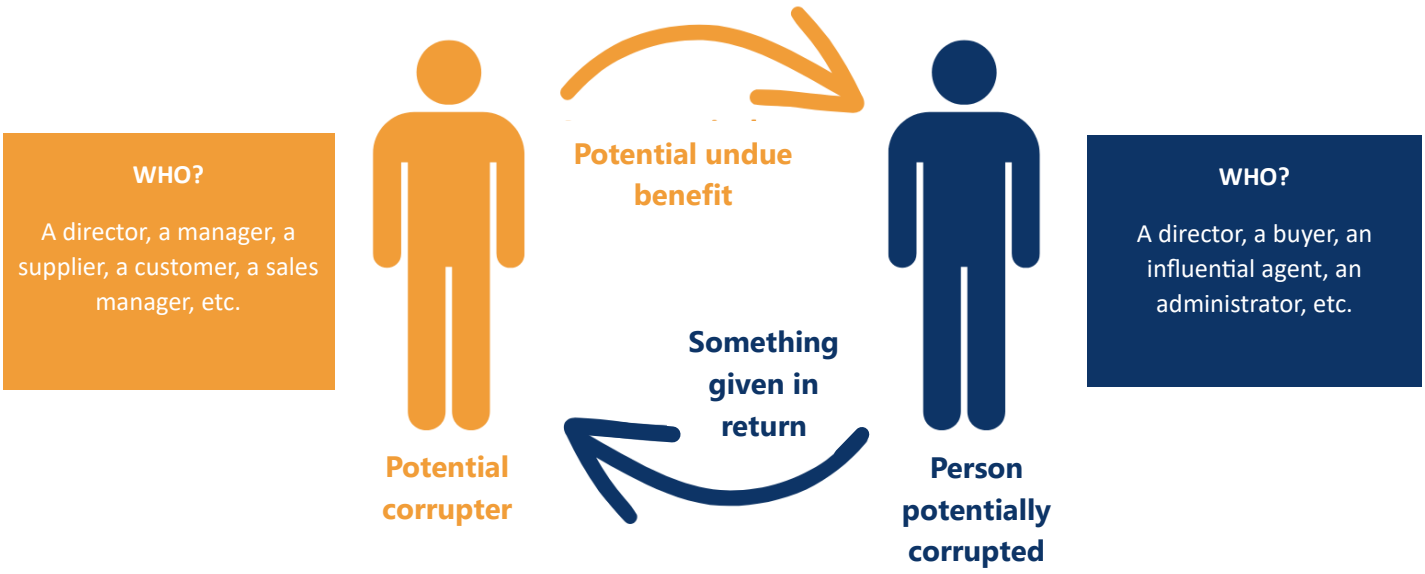
- Workforce of at least 500 employees
- And total sales turnover or consolidated turnover above €100m

Definition: Corruption is the act of **offering or giving benefits to a third party to perform or desist from performing an action falling related to their job**.

Unlike fraud, where one person can act alone, corruption necessarily requires the involvement of **two separate people**, the **corrupter** and the **person corrupted**. There are four factors for an act to be qualified as corruption: **a corrupter, a person corrupted, potential item given in return and a potential undue benefit.**

What benefits?

Money, a commission, a trip, a gift, hiring a friend or relative, etc.



What is given return?

A new contract, lenient authorisation, buying a larger volume than actually needed, etc.

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There is another concept to know about: influence peddling

This is the act of a person **monetising their position or influence, real or supposed, to influence a decision that will be taken by someone else**.

It involves three actors: **the beneficiary** (who provides the benefits or gifts), **the intermediary** (who uses the credit they have due to their position) and **the target person who holds decision-making powers** (public authority or administration, magistrate, expert, etc.). Corruption covers all its forms, including influence peddling.

The law distinguishes several types of corruption, **Active** or **Passive** corruption:

ACTIVE corruption

- When the employee offers or gives an undue benefit
- *e.g. a salesperson pays money to a customer to increase their order quantities, in order to reach their own year-end sales targets and receive their bonus*

PASSIVE corruption

- When the employee accepts a benefit in exchange for performing or desisting from performing an action related to their job
- *e.g. a buyer receives a gift from a supplier in exchange for their selection during a tender process*

And also **Public** or **Private** corruption. Corruption can be practised by someone as part of their public or private functions.

PUBLIC corruption

- When one of the people involved by the corruption is:
  - either an officer of the state: police, armed forces, local council leader, etc.
  - or responsible for a public service: notary, bailiff, court official, etc.
  - or an elected public representative: MP, senator, local councillor, etc.

PRIVATE corruption

- All the company's functions may be targeted by private corruption

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Different types of corruption

The Carso Group **forbids all transactions, requests or other acts that could look like corruption**.

To ensure they are identified, here are the main possible types of corruption, illustrated by practical examples.

Bribes	• *e.g. Paying a sum of money to a customs officer to release your goods*
Gifts and invitations	• *e.g. Accepting a starred restaurant or high-level sports event from a customer to agree a large price discount*
Expense claim	• *e.g. Invite a customer and their family on a trip or to restaurants without management agreement and include the receipts in expense claims*
Additional pay	• *e.g. Paying a one-off bonus to an employee who will then use it to pay someone else to facilitate market access*
Kickbacks (retro-commission)	• *e.g. Paying a business introducer a sum greater than the amount of the transaction and then recover part of this sum for your own profit*
Paid commission	• *e.g. Paying an intermediary, in addition to their remuneration, a percentage of the future transaction in exchange for being put in contact with a local council leader*
Confidential information	• *e.g. Accepting a very interesting position in a competitive company that contacts you, on condition that you send it internal information from the Carso Group about a current project*
Favouritism when recruiting	• *e.g. So that a customer accepts our large price rise without negotiating, on condition that we hire a member of their family*

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Our anti-corruption policy

The Carso Group **strictly forbids any act of corruption or influence peddling, in any form whatsoever**. All Carso Group employees must obey all laws on combating corruption.

> The Carso Group applies a ZeroTolerance policy on corruption

I undertake to	I refuse to
- Combat and reject any attempt at corruption - Follow and apply laws on combating corruption, the Code of Ethics and all our procedures on corruption - Immediately inform my line manager and internal audit manager using the **ETHICS internal alert system** of any approach, attempt or request that can be seen as corruption - Refuse a payment in exchange an undue benefit, even if this seems to facilitate obtaining a customer contract, for example - Ensure that our partners, suppliers and customers know about our policy to combat corruption - Always declare the identity of the recipient of any gift given and attach the corresponding receipt - Every lobbying activity conducted on behalf of Carso Group must be completely transparent, must obey laws in force and must first be approved by the Chairman of the Carso Group	- Give, promise or accept bribes or any other illegal benefit Offer, promise or give sums of money or anything of value to a representative of the public authorities or private organisations with the aim of obtaining an advantage for the Carso Group *e.g. it is prohibited, with the aim of benefiting the Carso Group, to give money to a political party, a trade union, representative of a private company or charitable body, etc.* e.g. *You take part in a tender process and your contact loves travelling. Can you offer them a trip of a week in Corsica? No!* - Promise, offer or provide, directly or indirectly, anything of value to a person to incite them to abuse their position in order to gain an advantage for the Carso Group or to reward them for having done so - Succumb to a facilitation payment *e.g. paying a customs officer to speed up customs clearance of your goods or a government official to obtain a permit more quickly* - Offer high-value gifts to civil servants to influence a decision to favour the Group - Pay any invoice not matching the actual services provided - Pay sums of money in cash or to bank accounts not in the beneficiary's name

All these situations are given as examples and are not limiting in scope

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Our gift and invitation policy

Any gift or invitation offered or received **must obey** the ***Group Gift and Invitation Policy***, which details the rules and permitted limits. **Every employee is required to read it and obey it.**

The **Gift and Invitation Policies of the business units** can be applied locally **only if they are more restrictive** than the ***Group Gift and Invitation Policy***.

In all cases, the following Group rules are applied to all Carso Group employees:

- **No Carso Group employee may offer, accept nor allow one of their family to accept invitations, gifts or favourable treatment by someone in a business relationship with the Carso Group, if it is intended to influence a current or future commercial decision**
  Or if the employee is intended to perform or desist from performing an action of their activity or position in breach of their legal, contractual or professional duties

- Any gift or invitation **given** must be **entered** clearly in **Expenses Claims or purchase orders or the corresponding invoices**, and in compliance with current regulations

- Any gift or invitation **received and not complying with our rules**, based on the criteria and limits defined in the ***Group Gift and Invitation Policy***, must be **refused, returned and declared in writing to your line manager and on the ETHICS internal alert system**



> In general, any gift or invitation given or received that could influence a commercial or other decision is strictly prohibited

I undertake to	I refuse to
- Obey the ***Group Gift and Invitation Policy*** and **distribute it to every new employee in my team** - Not offer or accept any gift or invitation that could influence a decision, or to put myself in a position of a conflict of interests or that looks like an attempt at corruption - Contact my line manager or the internal audit manager if in doubt about the intent, value and frequency of the gift or invitation offered or received - Question myself regularly about my practices to ensure they are in line with our procedures	- Disregard the ***Group Gift and Invitation Policy*** - Accept tickets from a supplier, such as for a sports or cultural event, in exchange for favourable contracts or to create a favourable environment for subsequent corruption - Receive or offer money - Conceal all gifts and invitations offered or received from my line manager

All these situations are given as examples and are not limiting in scope

Gift and invitation: good practices

Anyone who is offered or who offers a gift or an invitation must comply with the ***Group Gift and Invitation Policy*** and should consider the points below.

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Ask yourself the following questions:

- Do you feel comfortable with this gift invitation?
- Would you be comfortable if the existence of this gift/invitation were to be revealed to my work colleagues?
- What is the approximate value of the item? Does it adhere to the meaning of the measure?
- What is the background to this gift/invitation being offered? Is it offered out of politeness or to obtain something in return?
- By offering or accepting this gift/invitation, do I remain independent?
- Is this gift/invitation reasonable given the customs in my profession and activity?
- Is it, by its value or recurrence, liable to affect how I do my job or damage my reputation or my company's reputation?

If you're not comfortable or have a doubt, check the point in the *Group Gift and Invitation Policy* and contact your line manager or the internal audit manager.

Our policy on donations, patronage and sponsorship

Charitable contributions are permitted, but they must be made transparently and without influence over our commercial decisions.

Donations, charitable contributions

Donations and charitable gifts are benefits given as money and/or contributions in kinds that are allocated with a specific goal (research, training, the environment, charitable purposes, etc.). Only the departments responsible for social work are authorised, **with prior agreement from the Group Chairman**, to undertake such actions. Actually, requests for gifts, donations or contributions must be considered carefully, particularly those coming from people in a position to influence the Group's activities or that could, if the gift were granted, result in a personal benefit.

Patronage and sponsorship

Through patronage or sponsorship, the Carso Group wishes to provide financial or tangible support for a project, a social, cultural or sports action to communicate and promote values. Patronage and sponsorship actions require **prior agreement from the Group Chairman.** They must be made without seeking benefits other than promoting the Group's image.

I undertake to	I refuse to
- Support causes matching our values and do it transparently and impartiality - Obtain prior approval from the Carso Group Chairman for any donation, patronage or sponsorship - Forward to the finance department all the information needed for each sum paid to be recorded in the appropriate accounts ledger	- Commit the Carso Group to actions that are contrary to our values - Put pressure on our partners or employees to contribute to patronage projects that the Carso Group has chosen to support - Give funds or resources to a political party, an elected representative or a candidate for public office

All these situations are given as examples and are not limiting in scope

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Compliance and respect for applicable laws

Our Code of Business Conduct

Every employee must obey local and international laws, as well as sector-specific regulations. The Carso Group is committed to fair competition and to obeying antitrust laws (on unfair competition) and any other relevant law.

All our external partners, particularly including suppliers, subcontractors and consultants, must follow the principles of our Code of Ethics summarised in the ***Code of Business Conduct with our commercial partners***.

Employees responsible for relations with commercial partners must send these partners the ***Code of Business Conduct with our commercial partners***, as soon as the relationship is established.

Note that, if laws or regulations do not exist, then the principles of integrity, transparency, honesty and fairness should always guide our actions. **No Carso Group employee may breach these principles or Code of Ethics, even to benefit the Group's interests.**

Performance targets, particularly sales targets, must never be achieved by infringing laws, regulations or the Group's Code of Ethics.

Protection of information

The confidentiality of information must be ensured at all times. Any leak or inappropriate use will result in disciplinary action.

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Corporate Social and Environmental Responsibility

Our actions against harassment and discrimination

Occupational health, safety and quality of life

Our actions to support the environment

For these concepts, each Carso Group employee should refer to and strictly apply the **CSER Charter** available on the Group website and **all rules and principles on combating harassment**.



Personal data and confidentiality

Our personal data protection

Our confidentiality management

Our privacy policy

For these concepts, each Carso Group employee should refer to and strictly apply **our General Personal Data Protection Policy** when it is implemented.



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Our alert procedure

What is it?

Any Carso Group employee or third party, when using the alert procedure, should refer to the various measures detailed in this Code of Ethics, in accordance with the legislation and rules applicable in the country where they live, if they suspect a **breach of the Group's Code of Ethics or rules and policies**.

How to raise an alert?



Send an alert by e-mail to ETHICS@groupecarso.com

How should it be written? The guide below can help you:

01 Set out the facts, the story of what happened

02 Specify: the people involved, the period over which the event took place, frequency, if the situation recurred several times and

03 State if you were present during the occurrence, if there were witnesses and their names

04 Add any evidence to your report as an attachment

Our internal alert system

CARSO GROUP COMMITMENTS

IF THE ALERT SYSTEM IS USED OR INFORMATION COMMUNICATED, DONE IN GOOD FAITH

- Maintain the whistleblower's confidentiality
- No harassment
- No reprisals
- No discrimination

WHAT ARE THE ALERT CATEGORIES?

- Conflicts of interests
- Corruption
- Discrimination and harassment at work
- Human rights
- Computer fraud
- Hygiene, health and safety at work
- Anti-competitive practices
- Protection of the environment
- Relations with customers
- Relations with suppliers

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CARSO GROUP COMMITMENT

All measures will be taken to respect the desire for **CONFIDENTIALITY** expressed by anyone wishing to raise an alert.

ANONYMITY is an option offered to people when they submit their alert in the alert system by writing with an anonymous e-mail address.

The Carso Group undertakes to **protect the whistleblower who has used the alert procedure or who has disclosed information in good faith.**

The Carso Group reasserts its **COMMITMENT** that no employee shall suffer **REPRISALS** (such as a change of grade, threats, dismissal), **HARASSMENT**, or any other form of **DISCRIMINATION** arising from using the alert procedure or communicating information, done in good faith.

The Carso Group is committed to ensuring compliance with the measures embodied in current legislation.

How will an internal alert received through ETHICS be handled?



RECEIPT of the alert	The Carso Group has **7 days** to acknowledge receipt of the alert. The whistleblower will receive a message to acknowledge receipt of their alert to the e-mail address used on the alert system.
ASSIGNMENT of the alert	Alerts will be **assigned by their category** and on a **case by case basis**, to a person responsible for conducting the investigation. If the alert involves the **Group Finance, Administration and Purchasing Director**, then the alert will be assigned to other members of the Executive Board and Group Chairman. If the alert involves the **Group Chairman**, then the alert will be assigned to the Group Finance, Administration and Purchasing Director, who will in turn notify the Supervisory Board.
INVESTIGATION	The person assigned to the alert will conduct an internal investigation to **verify the facts** and whether or not it is appropriate to continue the investigation. Support from our outsourcing to a legal firm may be considered when the alert is received, depending on the severity and people involved. The person assigned will **conduct the investigation alone and will report directly to the Group Finance, Administration and Purchasing Director in their role as the Internal Audit Director, and to the Group Chairman, depending on the category of the alert.** To conduct their investigation, the person assigned may rely of members of a **TASK FORCE** to obtain information. Under no circumstances will the facts or background of the alert be disclosed to members of the TASK FORCE. **The person assigned** may also ask the Chairman or Group Finance, Administration and Purchasing Director to **outsource the investigation** at any time, depending on the severity of the facts or the people involved. The Chairman and Group Finance, Administration and Purchasing Director will be kept abreast of the facts and the people involved in the investigation.

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	The Chairman and Group Finance, Administration and Purchasing Director will decide the appropriate time to notify the member of the Executive Board to whom the facts and the people involved in the investigation are accountable. **Anonymity of the whistleblower** The person assigned to the investigation, internal audit manager and IT administrators will be the only people to know the **identity of the whistleblower**. In other words, even the Group Chairman of Group Finance, Administration and Purchasing Director won't know the identity of the whistleblower if the alert system has been used in good faith. It should be noted that the team of IT administrators responsible for managing information systems have a duty to maintain the whistleblower's anonymity, as well as the confidentiality of data for the alert, in accordance with the Administrator's Charter signed by each administrator.
RESPONSE	Response given to the whistleblower: the person assigned to the investigation will notify the whistleblower within a reasonable time of the measures considered or already taken following their report. A response will be sent via the alert system.
RESULT	This is the measures considered or taken by the Carso Group, as necessary with support from a legal firm, depending on the severity and nature of the facts.

In the absence of the internal audit manager, whatever the reason, the Group legal manager must take interim responsibility for handling alerts received in the ETHICS mailbox until a replacement is appointed, the internal audit manager returns or a new internal audit manager is hired.

Confidentiality and data management policy



The **ETHICS internal alert system** follows the principles of our General Data Protection Policy available on the websites of the Group and its subsidiaries.

Employees may refer to the GDPR (General Data Protection Regulation) processing page of the alert system when it is implemented.

Practical data of the ETHICS internal alert system

Security of the ETHICS@groupecarso.com e-mail:

- The internal audit manager is the only recipient of the ETHICS alert e-mail.
- The e-mail inbox is secured by the dedicated IT team, with traceability implemented for all actions and all flows for this mailbox and an alert set up for any internal or external attempt at intrusion
- Confidential data are secured (e-mail body text and whistleblower's e-mail address) if e-mails are transferred to people assigned to investigations
- Confidentiality of e-mail data:
    - The internal audit manager, recipient of the alert e-mail and their deputy
    - The person assigned to the investigation based on the alert category
    - The Group Finance, Administration and Purchasing Director

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    - The Group Chairman
    - The IT administrators responsible for managing information systems (in accordance with the Administrator's Charter signed by each administrator with administrator permissions)
- Respect for the whistleblower's anonymity if the procedure and the internal alert system were used in good faith. Only the people named below know the whistleblower's identity:
    - The internal audit manager
    - The person assigned to the investigation based on the alert category
    - The IT administrators responsible for managing information systems

Our other internal alert systems

There are **other alert systems active across the Group**, in particular:



- Online systems on our Italian subsidiaries' websites
- Systems in place receiving harassment alerts
- Systems for declaring conflicts of interests managed by the laboratories
- And any other system in place

If you have questions about these systems, you can contact your manager, your Human Resources officers for harassment, or the internal audit manager.

Disciplinary measures and monitoring implementation

Disciplinary measures

Failure to obey the provisions of this Code of Ethics may result in the application of disciplinary measures extending as far as dismissal.

Criminal penalties, with the risk of potential convictions to pay compensation and damages, may also be incurred for illegal conduct, under French law and any foreign laws that would be applied in this particular case.

Our foreign subsidiaries: French anti-corruption legislation known as the Sapin II law applies to all our business units in France and other countries. Corruption is an offence throughout Europe; only the penalties differ depending on the country. The offence of corruption will be handled by the courts in the country where the corruption took place and under local laws.

The Group undertakes to examine all reports, handle alerts diligently and with the strict presumption of innocence, evaluate the facts objectively and impartially, take corrective actions and impose appropriate disciplinary measures.

Monitoring and implementation of the Code of Ethics

The internal audit manager oversees application of the Code of Ethics, with regular internal audits.