

CODE OF ETHICS COMPIN FAINSA

COMPIN FAINSA is built around strong humanist values including respect and trust in relationships, a sense of responsibility, entrepreneurship, creativity, and innovation. These values are the foundation of relationships of trust within our company and with all our partners.

COMPIN FAINSA is recognized for its integrity in its management practices and business operations. For our Group, for every entity and for each of us, it is vital to preserve this reputation and to maintain the relationships of trust that must exist with our employees, customers, partners, and suppliers.

We are all guarantors of the reputation of COMPIN FAINSA which expects from each of us an exemplary behavior and integrity.

This Code of Ethics applies to all officers, directors, and employees of COMPIN FAINSA in all subsidiaries worldwide.

The guidelines contained in this Code are binding on us and, therefore, each of us must respect them in the conduct and management of our activities and the responsibilities entrusted to us. It is an act of responsibility and commitment.

7th March2023

Marc JAMMOT

COMPIN FAINSA

Chief Executive Officer

THE EXEMPLARY BEHAVIOUR WE DISPLAY IS A FUNDAMENTAL REQUIREMENT.

THIS IS WHY THE MANAGERS OF COMPIN FAINSA and THEIR EMPLOYEES UNDERTAKE TO RESPECT THE FOLLOWING PRINCIPLES AND RULES OF BEHAVIOUR:

FUNDAMENTAL PRINCIPES

- The principles stemming from the Universal Declaration of Human Rights.
- The principles deriving from international conventions, and in particular the prohibition of:
 - child labor
 - forced and compulsory labour
 - the use of illegal trafficking in labor.
- All Laws and Regulations in all countries where the Group's activities are carried out.
- Conventions and Laws relating to corruption and competition, including the Organisation for Economic Co-operation and Development (OECD) and UN Global Compact guidelines prohibiting bribery of domestic or foreign public officials.
- Environmental regulations, including:
 - compliance of activities with applicable regulations.
 - limiting the impact of activities on the environment by controlling energy consumption, resources, and the production of industrial waste.
 - the prevention and limitation of environmental risks of the activities and products used.

SOCIAL RIGHTS

- The reception and integration of employees; the development of employees' skills necessary for the exercise of their profession and the construction of their professional career.
- Equal treatment in matters of employment and occupation, prohibiting all forms of discrimination.
- Privacy, through the protection of personal data.
- The rights of employee representative bodies.
- Health and safety policies and procedures applicable on its sites.

CUSTOMERS, PARTNERS AND SUPPLIERS

- Rules ensuring fair and open competition.
- Professional, honest, and fair behavior.
- Equal treatment between suppliers.
- Export control regulations or trade restrictions (domestic and international).

CONFIDENTIAL INFORMATION, INTELLECTUAL PROPERTY AND ASSETS

- Confidential information, of a financial, commercial, or technical nature, exchanged with any third party in the context of business relationships.
- Personal information relating to employees.
- The intellectual property of the Group or third parties.
- The tangible or intangible assets of the Group or third parties.

RULES OF CONDUCT

- Protect information collected in the course of their duties and take all measures to prevent inappropriate use or disclosure.
- Not to accept, offer or grant, directly or indirectly, payments of money, gifts, benefits, or other acts of convenience or favors in order to enter into a commercial transaction.
- Not hold an interest in a company, nor participate in an activity, directly or indirectly, that would place them in a situation of conflict of interest or influence their behavior in the exercise of their professional activity.
- Not to engage the Group with any third party who, directly or indirectly, would present common interests or business relations with them, unless they have obtained a specific exemption from their direct manager.
- Contract with a commercial agent or business introducer only according to the rules laid down by the Group.
- Not to transmit to any third party or use information on customers, partners or suppliers that would be likely to characterize insider trading or any criminal offenses.
- Not to commit a Group company to contribute to any financing of political parties or the activities of elected officials or candidates, unless such participation has been previously authorized by senior management. Each manager or employee who contributes personally to activities of a political or public nature refrains from taking part in a decision concerning one of the Group's companies.

COMPIN FAINSA CONFERS ON EVERYONE THE DUTY TO PROMOTE THESE VALUES, PRINCIPLES, RIGHTS AND RULES OF BEHAVIOUR

ALERT PROCEDURE

COMPIN FAINSA, for the sake of integrity, has set up an internal alert procedure open to anyone facing a problem of compliance with the Code of Ethics.

The employee can consult his direct manager to solicit his recommendations to make the appropriate decision.

Any employee who wants can report any offense to his or her hierarchical superior. When the hierarchy cannot be the right channel, the employee can seize, by virtue of his duty to alert, the Compliance Officer who is the person in charge of the application of the Code of Ethics. Any alert can be sent by mail to the following address: compliance@compin.com

The Compliance Officer is the Group Quality Director. He is assisted by the CFO when there may be a conflict of interest (hierarchical or functional relationship) or by any person named in his sector of activity.

All employees have the duty to cooperate in any proceedings or investigations conducted by the company in relation to a breach of the Code of Ethics.

Failure to comply with the Code of Ethics may result in disciplinary sanctions determined by the hierarchy or civil or criminal proceedings when circumstances warrant it.

I acknowledge receipt of the document entitled "COMPIN FAINSA *Code of Ethics*" applicable throughout the Group.

I undertake to comply with its provisions in the exercise of the company's activities.

Name (block letters)

Function/Direction/Department

Date and place

Signature

This document will be placed in the employee's file.