

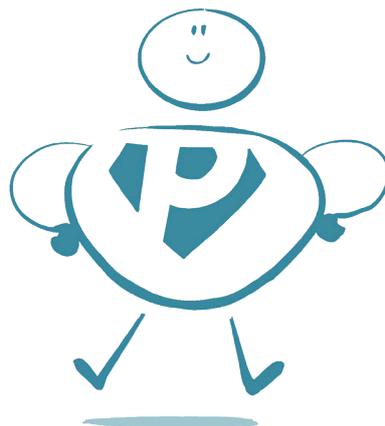


# PAPREC

## COMPLIANCE



## Paprec Group's Business Ethics Charter



January 2024



# PREAMBLE

**Ethics is a duty for all, it guides our individual behaviour and has informed Paprec's decisions since its creation. Everyone's behaviour is an essential component of our image, our reputation and the trust we inspire in our stakeholders.**

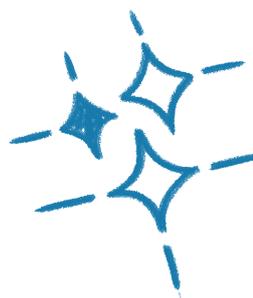
**This charter defines the principles and values to which the Paprec Group and all its subsidiaries adhere and which each employee must observe in the context of his or her work.**

**It is a reminder of our group's fundamental principles: loyalty and integrity in dealing with all our stakeholders, as well as respect for others.**

**It is based on the Group's 5 values :**

- I** Respect for people : because respect for individuals is central to us, we fight against all discrimination and for equal opportunities ;
- II** Secularism and diversity : we respect people in the diversity of their opinions, cultures, religions, education, origins and ages ;
- III** Professionalism : individual and collective performance is an essential condition for our long-term growth and development. Each of us contributes to this through our commitment and professionalism ;
- IV** The desire for excellence : we aim to be the best environmental professionals, at the forefront of techniques and quality ;
- V** Team spirit and solidarity, values that are essential to our success.

**We are counting on each and every one of you to ensure that you apply all the rules of conduct set out in this charter, which must guide your action within our group at all times and in all circumstances.**



**Jean-Luc Petithuguenin**  
Founding President

**Sébastien Petithuguenin**  
Managing Director Paprec

**Mathieu Petithuguenin**  
Managing Director Paprec

The purpose of the ethics charter is to reaffirm the Group's commitment to ethical principles. It is aimed at all managers and permanent or temporary employees of the Group as well as our stakeholders (customers, suppliers, subcontractors, partners, etc.).

THE PRINCIPLES GOVERNING THE ETHICAL CHARTER ARE AS FOLLOWS:

## 1 - RELATIONSHIPS WITH CUSTOMERS, SUPPLIERS AND OTHER STAKEHOLDERS OF THE GROUP

The Group applies its ethical principles to its relationships with all market participants, including customers, investors, partners, suppliers, service providers and subcontractors.

Respect for the customer is paramount. The Group pays particular attention to customer satisfaction based on the quality of products and services.

The choice of our partners and suppliers is made according to a process that meets objective and transparent criteria.

With respect to all the Group's stakeholders, Paprec employees adopt loyal behaviour and demonstrate fairness and impartiality during negotiations. They ensure that partners, suppliers, service providers and subcontractors have ethical concerns compatible with those of the Group and bring the Group's ethical charter to their attention.

The Group ensures the integrity and reputation of its partners, suppliers, service providers and subcontractors.

## 2 - RESPECT FOR THE PERSON AND HIS OR HER WORK

The Group's reputation is a key asset, a guarantee of our legitimacy and the trust placed in us.

Because our employees are our first ambassadors, we ask them to respect the company and its environment, their colleagues and the customers with whom they work.

Respect for work colleagues and one's superiors is an essential condition for the smooth running of the company. We want our employees to regard each other with respect and appreciation.

Kindness, loyalty and humility are also the qualities expected by the Group for each of its employees.

## 3 - RESPECT FOR HEALTH AND SAFETY

Because employees are an essential resource of the Group, we put their health and safety first. We guarantee our employees a healthy and safe working environment.

To do this, we are devising ever more effective solutions to improve their daily working conditions,

the prevention of occupational accidents and diseases, the empowerment of managers, the awareness of employees, the respect of work-life balance, etc.

## 4 - COMPLIANCE WITH LAWS AND REGULATIONS

The Group's reputation is built on strict compliance with the laws and regulations in force, regardless of the country in which it is established and where it operates. It is the responsibility of all our employees

to be aware of and fully comply with the applicable laws and regulations, as well as the various policies and procedures established by the Group in its various areas of activity.

## 5 - LOYALTY AND INTEGRITY

The Group asks its employees to commit not to adopt any attitude or behaviour that could put it at odds with its own commitments.

### ***Fight against corruption and influence peddling***

The Group aims to fight corruption and influence peddling in all the countries where we operate.

This fight involves regularly raising awareness among our employees of compliance with the regulations to which we are subject, especially the law of 9 December 2016 known as the Sapin II law.

Our Anti-Corruption Code of Conduct, which defines the types of behaviour to be prohibited as likely to constitute acts of corruption or influence peddling, is a pillar of this.

The fight against corruption concerns, in addition to our employees, all the Group's stakeholders (customers, investors, partners, suppliers, service providers and subcontractors).

### ***Fight against fraud***

The Group also intends to protect itself against all forms of fraud or attempted fraud to which they may be exposed, whether external (individuals acting to obtain funds, documents or information that can be used for their benefit to the detriment of the Group) or internal (malicious act by an employee to the detriment of the Group).

Each of our employees must be vigilant on a daily basis in order to help prevent and detect fraud attempts, whether internal or external.

### ***Anti-Money Laundering and Countering the Financing of Terrorism***

Money laundering is a method of allowing illicitly obtained funds (e.g. drug trafficking, corruption, prostitution, etc.) to be concealed or transformed into apparently legal operations.

It can also be linked to the financing of terrorism, which is characterized by providing or raising funds that can be used to commit a terrorist act.

To combat money laundering and terrorist financing, each of our employees must be vigilant in the conduct of financial operations and ensure the regularity of transactions.

### ***Fight against illegal labour, forced labour, child labour***

Our employees and partners must respect the principles upheld by the United Nations Global Compact on the protection of human rights and working conditions.

In this respect, we fight against all forms of forced or compulsory labour, against child labour and against discrimination in employment and occupation.

We also undertake not to use undeclared or clandestine work and to comply with the labour regulations in force in the country where we operate.

This fight for respect for human rights and labour rights is reflected in our vigilance plan, which also addresses environmental and corruption risks.

### **Conflicts of interest**

In the exercise of his or her activities, an employee may find himself or herself in a situation that creates or may create a conflict of interest when he or she has a direct or indirect personal interest that may compromise objectivity in the performance of his or her duties within the Group.

When there is a conflict of interest, the employee must inform his or her superiors immediately and refrain from investigating and taking decisions on any issue concerned by this situation.

### **Confidential Information**

Each of us must protect the confidentiality and integrity of critical information, whether it concerns the Group, its employees or third parties.

This confidential information is essential for the Group because it contributes to the development of its business: its dissemination would therefore be detrimental to its interests. This is why all employees must ensure that they do not disclose it to unauthorized persons, inside or outside the Group, and that they do not mention or report on the Group's operations in public places.

### **External communication**

In terms of external communication, any relationship with the media must be authorised in advance by the general management and must be carried out in conjunction with the communication department when the Group or any employee in the context of his or her professional activity is targeted.

### **Delegations of Authority**

The Group has put in place an effective system of delegation of authority, which is regularly updated.

All employees undertake not to commit the Group beyond the delegations of powers conferred on them and including in the scope of all letters and other correspondence that they are and will be required to write in the course of their duties. Anyone who has been delegated authority must abide by the terms of the delegation.

## **6 - FAIR AND EQUITABLE COMPETITION**

The Group ensures compliance with competition rules so that it is fair and equitable. No action by the Group must prevent, restrict or distort competition.

The Group rejects all unfair competitive and commercial practices, in particular any agreement with competitors or any concerted practice concerning, in particular, financial conditions, the allocation of services, markets or customers.

Not only any formalised agreement but also any concerted practice having the effect of or aimed at restricting free competition or fair competition is prohibited.

## 7 - USE OF THE GROUP'S ASSETS

The Group property that is made available to employees in the course of their duties is exclusively for professional use.

Consequently, it is forbidden in particular to :

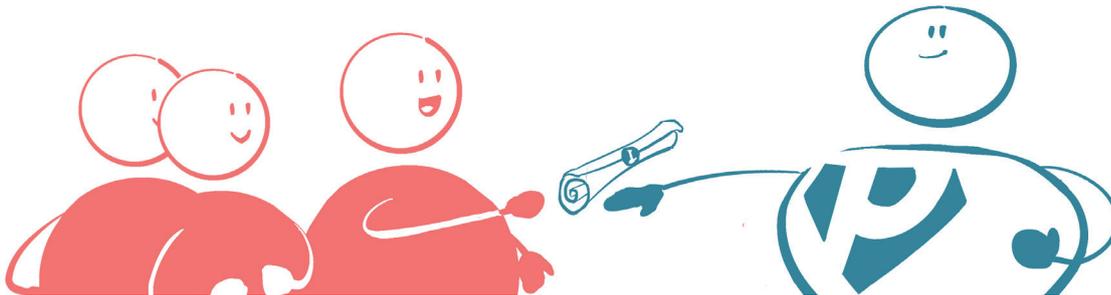
- Stealing or embezzling the Group's property for personal gain ;
- To transform or destroy the Group's assets without authorisation ;
- To use the Group's services or equipment for personal purposes.

Any expenditure made using the financial resources of the Group must be undertaken exclusively for business purposes.

In terms of intellectual property, the Group has a rule of acquiring the licenses necessary for the use of each software and only the Group's Information Systems Department is authorized to install them on workstations. It is strictly forbidden to copy such software for personal use.

this means of communication for illicit purposes, in particular to transmit or receive messages of a racial nature, sexual or abusive. It is also forbidden to load software or other applications on computers without permission of the company's Information Systems Department.

With regard to access to the Internet, it is forbidden to download non-professional data or to consult sites unrelated to the Group's activity or whose content could harm the Group's image, and to use



## 8 - RESPECT FOR PERSONAL DATA

The personal data collected by the Group is processed in accordance with the requirements of the European General Data Protection Regulation. All necessary safeguards are taken to preserve the security of data during its collection, communication or storage. In accordance with the applicable regulations, any person may request access to and rectification of his or her personal data.

## 9 - INTERNAL WHISTLEBLOWING PROCEDURE

Any employee who witnesses an unlawful act has the opportunity to inform the referents designated by the management bodies through an internal whistleblowing system. He must do so in good faith and without financial compensation.

## 10 - IMPLEMENTATION OF THE CHARTER

Managers are primarily responsible for implementing the rules and principles of the Group's ethical charter and must ensure that they are known and understood by all employees under their responsibility.

They must also guide employees in the application of the rules and principles contained in this charter. They must check that their employees are correctly following the rules and principles they are required to apply. Managers have a duty to set an example for their employees.

More broadly, each employee, regardless of their position, is responsible for their own behaviour and the consequences of their decisions.

If an employee commits an act contrary to the Group's ethical principles and values, he or she is exposed, depending on the circumstances, to disciplinary, administrative, or even civil or criminal sanctions.