

Code of ethics



MESSAGE OF CHAIRMAN

Integrity is one of our Five Values fundamental pillar.

Through these values, we give meaning to our actions.

Through these values, we can look to the future with confidence and build the Group's success together.

INTEGRITY is ensuring a safe environment for our employees and partners, acting in all circumstances with strong Ethics in order to earn the trust of our colleagues and business partners. This is the best way to achieve sustainable results. Respecting the rights of each person, their dignity, their preference, cultural differences.

In the conduct of business, each day, we take decisions. Economic stakes combined to the severity of our markets imply an enlarged responsibility towards all stakeholders. Our customers, suppliers and partners expect from us an unwavering responsibility.

EVERAXIS is committed to do business in compliance with stringent standards in matter of integrity and in strict compliance with laws and regulations.

We are all ambassadors and actors of our Code of Ethics and we carry its values. The respect of the Code of Ethics of the company must prevail over any other interest in all circumstances.

I thank you to pay the utmost attention to the respect this Code of Ethics.



DOMINIQUE MALLET
CEO

_Contents

01	_	The Code of Ethics at the heart of EVERAXIS' business	4
02	_	Employees	7
03	_	Ethics, the pillar of our activities	12
04	_	Compliance with Export regulations and embargoes	17
05	_	The Group's intangible assets (IP, IT security, confidentiality, personal data)	19
06	_	Relations with our business partners (customers, suppliers)	23
07	_	Corporate social responsibility	25

01_The Code of Ethics at the heart of EVERAXIS' business

- A _ Why is this Code important?
- B _ Who does this Code apply to?
- C _ The Whistleblower system

01 _ A



Why is this Code important?

For EVERAXIS, ensuring that the Group's activities are conducted in compliance with national, European and international laws and regulations, and according to the highest standards of integrity and fairness, is fundamental to the sustainable and solid development of the Group and a guarantee of confidence for our customers, suppliers and partners.

The Code of Ethics defines and explains the principles and rules on which the Group's ethical culture is based and on which everyone must rely in the performance of their duties and missions. The Code is there to allow and help everyone to make the right decision in the event of a situation posing an Ethical problem.

Compliance with this Code is essential regardless of the economic context, the competitive environment or the country in which the activities are carried out.

01 _ B



Who does this Code apply to?

This Code is for all Group employees and is intended to apply to everyone, regardless of their position or level of hierarchy within each Group company. Everyone must know and understand the values and commitments embodied in this Code, and act on a daily basis in accordance with the rules of ethics, integrity and the principles it lays down. Whether you are a manager or an employee, everyone's behaviour counts.

01 _ C



The Whistleblower system

Respect for the values and principles set out in the Code of Ethics is essential for EVERAXIS, and it is everyone's duty to remain vigilant to ensure that the working environment and relations with our customers and business partners remain in line with the Group's values at all times. To this end, it is essential that all employees be able to speak out and report any behaviour that is contrary to the Code or the law, or to the interests of the Group, without fear of retaliation.

EVERAXIS uses a digital platform for collecting and processing alerts, which is independent of the Group's information systems. The platform is hosted by our partner EQS, a company specialising in compliance solution.

The platform can be accessed from a smartphone, PC or tablet via the following link <https://everaxis.integrityline.com>, and allows you to make a report anonymously and in complete confidentiality. It is required to create an email address to exchange information with the persons who will be in charge of the investigation and, as far as legally possible, to be informed of the progress of the investigation.

The platform is available in French, English, Spanish and Swedish.

To ensure rapid processing of reports via the EQS platform, a network of Ethics Agents, local and trusted relays, has been set up on all sites. Their names are displayed on the usual information boards and media.

The Group encourages employees to use the platform to report any inappropriate behaviour or violation of the law. However, the platform is an additional channel of communication, and employees can choose to report any concern to their manager, the Human Resources Department, the employees' representative bodies, the Legal & Compliance Department, or the Ethics Agents.

02_Employees

- A _ Health and safety
- B _ Diversity, equal opportunities and inclusion
- C _ Harassment
- D _ Fight against modern slavery and human trafficking

02 _ A



Health and safety

The health and safety of employees and, in general, of anyone present at any of its sites, is a priority for EVERAXIS. Compliance with legal and regulatory obligations in terms of health and safety is essential and the involvement of management and teams goes beyond their obligations in this area.

The areas of work are developed based on a risk analysis: the integration of health and safety issues from the outset of all projects makes it possible to understand any problems that may arise and to resolve them as soon as possible.

EVERAXIS is committed to implementing all the necessary preventive actions to achieve its objectives, and strongly encourages feedback so that everyone takes responsibility and becomes an actor in prevention.

In the same way as the analysis of physical risks, an analysis of psychosocial risks is carried out. This represents a strategic axis to promote the prevention of occupational risks. The Group is committed to ensuring the strict application of safety rules, whether they relate to physical or psychosocial safety.

It is through the integration of health and safety fields in a cross-cutting way that our culture lives, and becomes more dynamic. The Group's objectives and priorities therefore apply to everyone, whether they are Group employees, temporary workers, consultants or even employees of our subcontractors.

02 _ B



Diversity, equal opportunities and inclusion

EVERAXIS is an international and multicultural Group. Respect for other cultures is essential and the Group is convinced that diversity is a factor that contributes to its development by enabling it to attract, recruit and retain talent, and to keep pace with the changing world in which the Group operates.

EVERAXIS fights against all forms of discrimination and also ensures that it offers equal opportunities to all, women and men, whatever their gender or their preference in that matter in its recruitment processes as well as fair treatment in the context of employee development and promotion, regardless of nationality, ethnic origin, skin colour, race, religious beliefs, disability, gender, marital status etc.

Any decision relating to employee recruitment or promotion must be based solely on skills, professional performance and adherence to the Group's values.



If a problem arises concerning diversity, equal opportunities or inclusion, speak to the Human Resources Department, the Legal & Compliance Department or report it on the platform <https://everaxis.integrityline.com> which allows you to remain anonymous.

02 _ C



Harassment

EVERAXIS attaches great importance to the respect and dignity of each individual. The Group is committed to providing a working environment free from all forms of harassment and bullying, whether verbal, physical, visual or psychological. It strongly condemns any situation in which an individual engages in unwanted behaviour, which has the purpose or effect of undermining the dignity of another person or creating an intimidating, hostile, degrading or humiliating environment for this person.

EVERAXIS raises the awareness of all of its employees on this matter and encourages everyone to be vigilant and attentive to the emotions and perceptions that each person may have of a situation. What is acceptable for one may not be acceptable for another.

Harassment can take several forms:

- **Sexual harassment** is characterised by any unwanted and inappropriate behaviour with a sexual connotation against a woman, a man or a transgender person (e.g. advances, staring or inappropriate remarks)
- **Racial harassment** relates to a person's colour, ethnic origin or nationality.
- **Psychological harassment** is any behaviour which has the purpose or effect of affecting the mental health of a person.

Persons found guilty of harassment are liable to disciplinary sanctions up to and including dismissal, and in the event of legal proceedings, they may face criminal sanctions, fines and imprisonment.

EVERAXIS has a "ZERO TOLERANCE" policy for any form of harassment and retaliation against a victim of harassment who has reported it.



If an employee is a victim of or witnesses harassment, it must be reported without fear to the Human Resources Department, the Legal & Compliance Department or through the digital platform <https://everaxis.integrityline.com> which allows to remain anonymous.

02 _ D



Fight against modern slavery and human trafficking

EVERAXIS adheres to the principles contained in the Universal Declaration of Human Rights, and respects the rights of its employees as set out in the International Labour Organization's Declaration on Fundamental Principles at Work, namely to benefit from a decent minimum wage, freedom of association, non-discrimination, elimination of modern slavery, such as forced labour, child labour and human trafficking.

On a daily basis, EVERAXIS strives to provide a working environment for its employees that is in line with these principles, and requires its suppliers and service providers to respect these same principles, and to eradicate from its operations and supply chains any supplier or system that violates them.

03_Ethics, the pillar of our activities

- A _ Anti-corruption, gifts & hospitality policies
- B _ Conflicts of interest
- C _ Fair Dealing
- D _ Accuracy and truthfulness of information
- E _ Political and charitable activities

03 _ A



Anti-corruption, gifts & hospitality policies

EVERAXIS strongly condemns all forms of corruption and has adopted a «ZERO TOLERANCE» approach to corruption in all its forms. Therefore, EVERAXIS employees, as well as any party representing EVERAXIS, are prohibited from offering, promising, paying, soliciting, requesting, agreeing to receive or accepting any bribe or kickback or any other type of prohibited payment or inducement, in cash or in any other form, from business representatives, domestic or foreign officials, for the purpose of obtaining or retaining business or influencing individuals or the businesses they represent or inducing officials to act improperly in the course of their duties.

Payments in cash, other than for small, documented expenses (expense reports, taxis, etc.) are prohibited. Similarly, any unofficial payment, known as a «facilitation payment», made in order to speed up a procedure (e.g. granting of permits, customs clearance) and corresponding to services already paid for, is strictly prohibited.

Corruption can also take the form of gifts or hospitality. EVERAXIS has adopted a policy in this area to help its employees make the right decision, taking into account the circumstances surrounding a gift or hospitality and the value of the gift or hospitality.

In general, giving/accepting a gift or offering/accepting hospitality in order to obtain a contract, or during negotiations, is strictly prohibited.



For any situation involving corruption, contact the Legal & Compliance Department or report it on the digital platform <https://everaxis.integrityline.com> which allows to remain anonymous.



If you need advice relating to a gift or hospitality, seek the advice of your manager.



03 _ B

Conflicts of interest

A conflict of interest arises when one person has a personal interest in the outcome of an action. For example, the possibility of direct or indirect personal gain may influence a decision in connection with the conduct of an activity, the negotiation of a contract, the selection of a supplier or service provider.

Such a situation may damage the reputation of the Group's management and the reputation of the Group itself.

Each employee must act loyally and in good faith in the performance of their duties and avoid any situation where their individual interests could conflict with those of the Group.

The interests of the Group must prevail in all circumstances and no business decision should be taken by an employee because of the prospect of obtaining a personal benefit or interest from his or her personal relations.

No employee should disclose any information or opportunity for personal benefit or gain.



Any potential conflict of interest must be reported to the manager or to the Legal & Compliance Department, or on the digital platform <https://everaxis.integrityline.com> which allows to remain anonymous.

03 _ C



Fair Dealing

The development of EVERAXIS is based on commercial successes, the dynamism and expertise of the teams in conquering new markets, winning tenders and remaining alert to any opportunity that arises. However, it is essential to act in all circumstances fairly in accordance with competition regulations («Anti-trust») and the following practices:

- **No agreements (written or oral)** with competitors the purpose or effect of which is to fix prices, share customers or markets, exclude or boycott companies. These practices are strictly prohibited.
- **No abuse of dominant position.** For some large players, the rules for conducting business are stricter because of the impact their decisions may have on smaller players, in particular by blocking their access to certain markets. As a result, the competition authorities monitor their activities and carry out regular controls.
- **Exchanges with competitors** when participating in professional associations, conferences, seminars, trade fairs etc. must respect the above principles, and any attempt at discussion in contradiction to these principles must be strongly condemned.

— **Violation of competition rules** is severely punished by all legislation, whether European, American or enacted by other jurisdictions. Managers are criminally liable and may be punished by heavy fines and/or prison sentences. The Group could be forced to pay large fines or settlements and its reputation could be damaged.



For any questions regarding fair competition rules, contact the Legal & Compliance Department and/or report any suspected breach on the digital platform <https://everaxis.integrityline.com> which allows to remain anonymous.

03 _ 0



Accuracy and truthfulness of information

EVERAXIS strives to prepare and disseminate fair, accurate and relevant financial information to its shareholders.

In general, all information and documents concerning the Group's businesses are treated with the utmost care, whether they relate to its customers, employees, business partners or suppliers, and in compliance with confidentiality undertakings.

Compliance with laws, regulations and internal rules is essential. The Group raises the awareness of its employees on these aspects in order to avoid any breach and exposure to civil sanctions or criminal proceedings.

03 _ E



Political and charitable activities

EVERAXIS is not politically active and does not support any party in any country. The Group makes no contributions to political parties.

EVERAXIS respects the right of its employees to hold political opinions and to participate in political life, but it is forbidden to express a political opinion or to support a party on behalf of the Group, or to present oneself as representing the Group at a political event.

EVERAXIS has no charitable activities but respects the right of its employees to belong to associations as individuals and outside their professional activity within the Group. It is forbidden to use the Group's resources to make a contribution to a political party or association.

04_ Compliance with Export regulations and embargoes



EVERAXIS operates in a worldwide environment and all Export, Import or re-export transaction shall be made in compliance with all applicable laws, regulation, embargoes, sanctions applying to Export control, including extra-territorial regulations, whether European or issued by US Government or authorities, imposing embargoes and/or prohibiting activities with certain countries on pain of sanctions.

“Export” means the operation of sending or shipping not only products but also services, data, or technology in a country other than the country of origin. Violation of all these regulations could have a significant impact on the Group, whether in financial terms or for its reputation. Any breach by an employee of a mandatory law or regulation may be subject to disciplinary sanctions, and the Group and its management may be exposed to criminal sanctions, such as fines or imprisonment.



If you witness or suspect a breach of these rules, consult the Legal & Compliance Department or make a report through the digital platform <https://everaxis.integrityline.com> which allows to remain anonymous.



05_The Group's intangible assets

IP | Confidentiality | IT security | Personal data

- A _ Intellectual property
- B _ Confidential information
- C _ The integrity of our information systems and the use of social networks
- D _ Personal data

05 _ A



Intellectual property

Intellectual property is a key asset of the Group and enables it to remain at the cutting-edge of technology and to differentiate itself from competitors' products. The Group takes care to preserve the validity and integrity of all intellectual property rights, whether they relate to know-how, such as methodologies, industrial processes, or whether they are protected by copyright, trademarks, or by industrial manufacturing secrets.

The Group also ensures that the intellectual property rights of third-party business partners are respected. It is strictly forbidden to use intellectual property belonging to third parties without their authorisation.

If you have any questions about intellectual property protection issues, contact the Legal & Compliance Department.

05 _ B



Confidential information

Information is considered «confidential» either by law or by agreement. As a general rule, certain categories of information are always considered confidential:

- Business data, HR information, information related to customers, suppliers and any business partners;
- Technical information, know-how and industrial secrets developed by the Group;
- Employees data and more generally any personal data.

The Group takes the necessary measures to ensure the protection of confidential information belonging to it, but also to protect from unauthorised disclosure all information entrusted to it by ensuring compliance with the confidentiality undertakings entered into with its business partners.

05 _ C



The integrity of our information systems and the use of social networks

EVERAXIS Group is very vigilant in protecting its information systems and IT equipment against any internal or external threat, whether deliberate or accidental.

Access to systems, applications and information is secure. An authentication process makes it possible to manage and limit access to only those users whose function requires it, depending on the degree of criticality or confidentiality of the information. In addition, for all sensitive data, encryption measures are put in place in accordance with the standards applied in the Group's areas of activity, such as the "Encryption Standard". The connection, use of equipment or installation of applications not approved by the Group is strictly prohibited.

Access to social media for non-professional purposes on devices and equipment owned by EVERAXIS and made available to employees is not permitted. Any employee mentioning the Group, a company of EVERAXIS Group or the EVERAXIS brand on social networks, such as Facebook, Instagram, LinkedIn, etc., must do so taking care not to damage the image or reputation Group.

05 _ 0



Personal data

The definition of personal data is very broad as it covers **any type of data that enable the identification of a person, directly or indirectly**. Therefore, data such as IP address and connection information are, in the same way as the first name, surname and email address, personal data. The personal data protection regulations apply very broadly to all data processing, whether it concerns employee data in the context of employment or the data of business partners in the context of business relationships.

The European Union as well as many countries have adopted regulations to govern the use of personal data and guaranteeing the rights of individuals over the data concerning them. EVERAXIS carries out its activities in compliance with the regulations relating to the protection of personal data in all the countries in which it operates - in particular the European General Data Protection Regulation (known as the «GDPR») - and ensures that it only collects and processes data for the purposes strictly necessary for the proper conduct of its activities, and only retains such data for the time necessary for their processing.



06_Relations with our business partners

Customers | Suppliers | ...

A _ Our customers

B _ Our suppliers and service providers

06 _ A



Our customers

Customer focus is a core value and a priority for EVERAXIS. The Group attaches great importance to close collaboration with its customers and implements all its expertise and know-how to offer them quality products, meet their requirements or anticipate their expectations. EVERAXIS strives to build a lasting and personalised relationship of trust with each of its customers, based on respect for Ethical values and professional integrity

06 _ B



Our suppliers and service providers

EVERAXIS selects its suppliers and service providers according to criteria of respect for Ethical standards and compliance with national, European or International laws and regulations applicable to their field of activity, in particular compliance with regulations relating to the protection of human rights or the environment, such as the "REACH" or "Conflict Minerals" regulations. EVERAXIS requires all its suppliers and service providers to adhere to the principles set out in this Code.

EVERAXIS also works closely with its suppliers to establish reliable and sustainable procurement procedures. Decisions are based on the quality of components and on prices, ensuring to avoid any conflict of interest or decisions contrary to the Group's interest.



07_Corporate social responsibility



Our policy to reduce environmental impact

EVERAXIS is committed to contributing to the fight against global warming and aims to evolve in an environment in line with the challenges and changes affecting our society. This implies integrating environmental issues into all areas where our levers for action are possible.

The Group applies its environmental standards through two main orientations:

- The first orientation focuses on the control of energy consumption at each production site. Today, more than ever, energy expenditure must be controlled in order to reduce the impact of the Group's activities on the environment, in a concrete way, on a daily basis, with actions such as the control of energy consumption in offices, waste management and optimised purchasing processes.
- The second orientation is a "product" orientation. EVERAXIS encourages and supports the purchase of environmentally friendly products. The Group has expertise across the entire production chain, and approaches the environmental impact of its product through a life cycle perspective. EVERAXIS has set itself the following priorities: to challenge the design of its products by working as much on their composition as on their sustainability over time; to optimise production processes in order to preserve the resources at its disposal; to work closely with the various players in the value chain so that everyone works in coherence to preserve the environment.

The environmental approach is applied as exhaustively as possible within an area controlled by each site. The teams work to achieve measurable but also ambitious objectives in order to go beyond regulatory expectations.

EVERAXIS™

Lifetime precision for Xtreme conditions™

everaxis.com