

Ethical **Charter**

sicame
GROUP

Sicame Group is specialized in products and services related to transmission and distribution of electrical energy, renewables, electro-mobility, safety equipment and industrial applications.

As a player in the energy transition and driven by a desire to conduct our activities in a responsible manner, by respecting the principles of the Global Compact, to which we adhere.

We feel it is important to promote respect for environmental, social and ethical principles throughout our value chain.

This is why we ask our suppliers to adhere to and respect these principles by signing this ethical charter.

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Compliance with the ethical charter

This Ethical Charter is aimed at protecting Group Sicame collaborators, directors, investors and business partners' integrity (hereinafter **"Collaborator"**).

The present Ethical Charter shall be observed by all Group Sicame business partners (hereinafter **"Partners"**).

More generally, all Group Sicame Partners must ensure that they comply with all applicable national and international laws and regulations, including but not limited to human rights, fight against corruption, fraud and money laundering, personal data protection, and international sanctions related to export control and dual-use goods.

Human rights

Partners are committed to promoting and respecting international human rights standards, including the ILO core conventions in the following areas:

- **Conventions No. 29 and No. 105** prohibiting the use of forced labor
- **Conventions No. 138 and No. 182** concerning child labor and the minimum working age
- **Conventions No. 100** on equal remuneration and No. 111 on discrimination: employment and training.
- **Convention No. 155** on occupational health safety.

In addition, the Partners are committed to developing diversity and inclusion.

Environmental stewardship and compliance

The Sicame Group's partners are committed to respecting the laws and environmental standards in force in their countries concerning their operations and their products.

Beyond the respect of regulations, partners commit to reduce the environmental impacts related to their products and activities (Energy, GHG, water, waste...)

The partners commit to provide the characteristics and environmental data related to the products supplied that may be requested by the Sicame Group.

Conditions and quality of life at work

Sicame Group's Partners undertake to respect the rights of employees and to provide working conditions that comply with the regulations in force in the countries where they operate. This includes in particular the respect of social minima (e.g working hours or wages, etc).

Partners are required to respect the freedom of association of workers and ban any inhumane behavior or actions towards their employees such as verbal or physical violence, moral or sexual harassment.

Compliance with laws

Group Sicame Partners must comply with all laws and regulations applicable to their business in which operations are managed or services are provided.

More specifically, Partners must ensure that their products and services comply with all laws and regulations applicable to the territories involved.

Corruption

Group Sicame intends to build relationships based on trust and ethic business practices. Therefore, Group Sicame rejects any form of corruption and influence peddling. Group Sicame Partners are required to adhere to the same standards. Indeed, Group Sicame is committed to fighting against corruption, influence peddling, fraud, financial crime, anti-competitive practices, conflict of interest and any breach of probity in the countries in which it operates.

Notably, regarding bribery and influence peddling, Partners are forbidden from granting, offering, promising or requesting, directly or indirectly, any sum of money or any object of value to a public official or an employee of a private company, with the aim of exerting undue influence or obtaining an undue advantage. This prohibition also applies to facilitation payments.

As required by French Loi Sapin II, Group Sicame implemented a compliance program in order to prevent corruption. Within this scope, Group Sicame also established an Anti-Corruption Code aimed at guiding the Group Sicame collaborators' actions and behaviors as regards gifts and invitations, relations with public agents, relations with suppliers and clients, sponsorship etc.

Partners shall comply with all anti-corruption laws and regulations applicable to the performance of their obligations in the course of their relationship with Group Sicame. More broadly, Partners must comply with the local laws and regulations applicable to their business, including the laws and regulations of all countries in which business operations are managed or services provided.

Whistleblowing

Whistleblowing right enables everyone to express themselves whenever they estimate having good reasons to consider that a transaction, an operation, an instruction or a particular situation for which they have personal knowledge of, does not appear to comply with rules governing Group Sicame activities.

In particular, Group Sicame Partners are expected to make available to their collaborators the appropriate tools enabling them to ask their questions or to report a problem, without fear of reprisal.

Accuracy of accounting documents

Group Sicame Partners must establish an accurate accounting, without ever modifying the data entered with the aim to misrepresent or conceal the amount of the transaction recorded. All documents made or received in support of a business transaction shall reflect a complete and fair view of it. Such documents shall be preserved as per the legal and contractual requirements in force.

Business ethics

Competition and antitrust

Treatment of partners
Group Sicame endeavors to treat all of its Partners uniformly and fairly. In deciding among competing partners, it is Group Sicame's goal to objectively and impartially weigh all facts in making an award decision and to avoid even the appearance of favoritism. Group Sicame strives to follow established routines and procedures in the procurement of all goods and services; and strives to make business decisions on best value, which may include factors such as service, competitive pricing, timely delivery, credit worthiness, timely payment, contract performance, quality of material, labor standards, environmental, health and safety performance.

Compliance with competition laws and regulations
Group Sicame Partners must not enter into any formal or informal anti-competitive arrangements to fix prices, collude, rig bids, limit supply, or share markets (customers or territories) nor exchange any, current or future, pricing information in that regard (e.g., information about actual or potential customers; sales and marketing plans; programs and strategies; sales, costs, margins and other financial data, business plans...) with competitors (e.g., cartel or any activity that could unlawfully restrain competition).

In addition, Partners must not enter into illegal agreements in the context of public tenders.

Any other practice that jeopardizes free competition is also prohibited.

Gifts

As anti-corruption rules prohibit the offering of gifts and invitations aimed at obtaining an undue advantage or exerting unwarranted influence on any official action, the offer or acceptance of such gifts and invitations is strictly regulated.

Notably, Group Sicame Partners shall make sure that:

- It has a professional purpose.
- It is of a value that complies with the thresholds set out in Group Sicame's Gift and Invitation Policy. Goodies, samples or products with no commercial value are accepted.
- It must be in accordance with local customs. Any gift that would be culturally inappropriate to refuse may be accepted by the Sicame Group Collaborator provided that the value is reasonable and that the Collaborator informs his/her line manager.

- It is not offered, directly or indirectly, in exchange for a specific benefit or action.
- That it concerns only the collaborator or the Partner, to the exclusion of their family or other relations.
- That it takes place away from any important decision-making (e.g. any competitive bidding process).
- Indeed, the circumstances of the gift or invitation must not be such as to inspire suspicions of corruption, even after the fact. It is therefore necessary to be attentive to the context and the meaning of an advantage or gift, which must not imply any expectation of compensation.
- It should not embarrass the Collaborator or Group Sicame if it is made public.
- It must be recorded in a register kept by the Collaborator for this purpose.
- Cash gifts are PROHIBITED. The Collaborator may only accept an invitation to an event if the inviting business partner is present at the event or represented. In addition, invitations to lunch or dinner from clients or suppliers are acceptable as long as the cost of catering on the Collaborator part is compatible with the Group Sicame travel policy.

If local legislation is stricter than the rules of the Group Sicame's Gift and Entertainment Policy, more restrictive local policies may be put in place to comply with local regulations. In any case, these policies must necessarily respect at least the rules set out above.

Group Sicame Partners must ensure, in all their business relationships, that applicable laws and regulations allow them to offer and/or accept gifts/entertainment.

In any case, these must always be legitimate and of reasonable value.

Confidential information

Group Sicame Partners are required to protect information and sensitive data belonging to it. Group Sicame Partners are prohibited to use such information and data outside of the framework set by contractual agreements that bind them to Group Sicame entities, without having obtained involved Group Sicame entities prior written approval.

Personal data

Group Sicame Partners must comply with all laws and regulations related to personal data protection.

Intelectual property

Group Sicame Partners shall comply with applicable law related to intellectual property. It is forbidden for Partners to infringe third-parties intellectual property rights when creating, manufacturing, providing products or services for Group Sicame entities.

Product safety

The Sicame Group‘s partners undertake to provide all guarantees relating to the safety of the products supplied.

Global trade & export control

Group Sicame Partners are required to comply with all laws and regulations related to goods or services import and export, including compliance with sanctions and embargoes legislations.

In particular, Partners are required to provide accurate export control classification, information and to obtain export control authorizations when required.

More generally, Partners must take the necessary steps to prevent any action or behavior that could be sanctioned by a national or international authority.

Hazardous substances and minerals from conflict zones

Where applicable, Partners should carefully check their supply chain and identify the origin of the minerals used. This will allow them to confirm that the products they supply to Group Sicame do not contain any minerals from conflict zones.

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