
CODE OF ETHICS AND CONDUCT



Editorial



The future and success of the MADIC group depend on the **trust** we inspire in our clients, employees, and partners. This trust is built day by day, thanks to our commitment to **strong ethical values and impeccable business practices**.

For the past 15 years, our company has focused its growth on a strategy of sustainable development, based on **respect for Humanity, the Enterprise, and the Planet**. In this spirit, we have developed this code of ethics and conduct.

This code is not just a set of rules to follow. It embodies our will to unite all employees around essential common principles: **respect, integrity, and responsibility**. It provides guidelines to recognize and resolve ethical issues, while defining the principles of conduct for proper **functioning and compliance with regulations and laws**.

Although nothing can replace common sense and personal ethics, this code is an essential reference tool. It applies to **all employees, executives, members of executive committees, managers**, as well as anyone acting on behalf of the company.

The respect for this code is everyone's responsibility. It is crucial for our sustainable growth, our reputation, and the maintenance of a culture of honesty, integrity, and responsibility. Every collaborator, at all levels of the organization, has the responsibility to embody these principles in their daily actions.



I count on each of you to bring these ethical principles to life and contribute to the perpetuity and success of our group.

Christian BLOSSIER,
President of the
MADIC group

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Our three major general principles



Legality

The recipients of this code of ethics and conduct are duty bound to comply with applicable regulations in the countries in which they operate as well as with the internal rules applicable to the entity to which they belong.



Equity

Recipients are duty bound to comply with ethical and professional rules, especially their duty to conduct due diligence and apply expertise in operations undertaken on behalf of the company.



Transparency

Recipients are duty bound to comply with a duty for extended transparency comprising the clarity, exhaustiveness and relevance of information, by avoiding misleading situations in the operations performed on behalf of the company.



This code of ethics and conduct fits into the context of a number of international texts whose principles are shared by the company:

- the Universal Declaration of Human Rights;
- the main conventions of the International Labour Organisation, especially conventions 29, 105, 138 and 182 (Worst Forms of Child Labour), 155 (Occupational Safety and Health), 111 (Discrimination), 100 (Equal Remuneration), 87 and 98 (Freedom of Association, Right to Organise and Collective Bargaining);
- the United Nations Convention of the Rights of the Child;
- the United Nations Pact signed by MADIC Holding in 2022;
- the French "Sapin II" law that came into force on 1 June 2017.

Rules of conduct

1 Towards people



Guaranteeing Health and Safety at work

Our company's primary wealth resides in the women and men that constitute it. We feel that it is our social responsibility to provide all of the company's staff and outside personnel, an environment that preserves their health and safety as well as a quality workplace.

To do this, we are committed to a "zero accident" safety policy that requires all of our staff to prioritise their own health and safety, and that of others, under all circumstances.



Encouraging flexibility in the organisation of work

To promote a fair work-life balance, a **charter covering the right to disconnect** has been implemented to guarantee all staff members the right to not have to be connected to their professional digital tools outside of their working hours.

Furthermore, remote or home working agreements or policies have been implemented in subsidiaries where business operations and regulations permit.



Encouraging healthy, responsible and positive human relations

As respect for the human being is our number one value, we felt that it was important to define the fundamentals to be respected every day during our workplace interactions:

- Showing respect and consideration
- Listening and communicating
- Commitment and exemplarity

A charter for human relations at work serves to define these behaviour principles that are essential for cooperation.

Our company also commits to encouraging diversity and inclusion and to prohibit any form of harassment or discrimination, especially that founded on gender, sexual orientation, ethnic origin or religion, political views, disability, age, etc. as well as any other cause for discrimination as defined by applicable law.



Respect for privacy and data protection

We respect the privacy of our staff members and always observe neutrality in relation to political opinions or religious beliefs.

We have also set up an organisation to ensure the protection of data belonging to anyone who enters into any interaction with the company, in line with applicable regulations on privacy. A **GDPR charter** defines the main measures relative to personal data protection that the company implements and expects from its partners.

The DPO can be contacted at the following email address: privacy@groupe.madic.com

Rules of conduct

2 Towards commercial relationships

Notre company imposes professionalism, competence, availability, respect and equity in its commercial relationships. It is therefore essential that these relationships be founded on complete transparency, equity, independence and respect for applicable laws and regulations.

Fair competition

Notre company believes in and promotes values based on fair and equitable competition. We take care to not sell products that show the use of words carrying inaccurate information that lead to misunderstandings regarding the origin, the provenance or the true quality of the product.

Our company competes fairly in the markets where it operates and refrains from adopting any kind of anti-competitive or collusive practices and from divulging false information about its competitors.

Money laundering

Our company commits to preventing and fighting money laundering in all of its commercial transactions. Money laundering is illegal and contrary to our fundamental ethics principles.

Therefore, we undertake checks on our business partners, depending on the degree of risk, and we ensure the traceability of financial transaction flows.

We encourage every staff member to properly know their business partners and report any situation involving any risk and we prohibit hiding the origin of any transfer received or beneficiary of a payment.

Relationships with consultants and agents

Relationships with agents are covered by formally set out contractual relationships in which the terms and conditions and the purpose of the contract as well as the terms of invoicing are expressly stated.

For every contractual relationship, a confidentiality agreement must be signed.

Fighting corruption

Our company strives to fight actions of corruption, influence trafficking, graft, taking illegal advantage, embezzlement of public funds, favouritism or any breach of probity in countries where it operates. Notre company applies national and international laws on fighting corruption in every country where it operates.

- **Gifts & Invitations:** offering or receiving goods or services in order to gain direct or indirect advantage is prohibited.
- **Patronage & Sponsoring:** patronage and sponsoring actions require general management permission.
- **Representing special interests (lobbying):** lobbying requires general management permission. These actions must be clear and transparent.
- **Conflicts of interest:** Our company's commercial decisions are made objectively, without any personal consideration. Any activity or assignment by group staff members and governing bodies that goes against the company's interests are prohibited.
- **Fraud:** Company property must only be used by staff members for the profession purposes it is intended for and not for undue personal or illegal use or for other purposes.



Rules of conduct

3 Towards customers and suppliers



CUSTOMERS

Protecting the safety of our clients and users

As part of its activities, our company has made a commitment through its **GDPR Charter**, to adopt strong measures to ensure confidentiality and security when collecting and processing personal data, whether they are responsible for the data themselves or subcontracting the work.

Sensitive data on our company and its partners is protected against any deliberate or accidental alteration, as well as having its confidentiality, integrity or availability protected thanks to a secure IT system and the **advanced cybersecurity approach**.

An **IT and Communication Charter** is deployed to guarantee compliance with the rules and stipulations on the use of this IT system.

Honesty and transparency in outside communications

Commercial proposals will be suited to, and respectful of, client needs. Compliance with the commitments made is monitored and deemed a priority. All outside communication is honest and transparent.



SUPPLIERS

Monitoring the ethics of our suppliers

We consider that a company's performance is also linked to that of its suppliers and subcontractors.

The **Supplier Code of Conduct** requires them to ensure that all of the following stipulations are complied with by their staff members, their own suppliers and subcontractors that take part in the production process for the products and services supplied to one or more MADIC group companies:

- Labour and human rights
- Anti-corruption
- Ethics and integrity
- Health and safety
- Environmental protection
- Quality commitment

Responsible purchasing

Aware of the impact that our purchasing decisions can have on communities, workers and the environment, we strongly commit to promoting ethics, sustainability and inclusion in all of our activities, to collaborate with responsible partners, to encourage transparency and to innovate sustainably.

A **Responsible Purchasing Charter** reflects our commitment to a sustainable and ethical future.

Rules of conduct

4 Towards public bodies and administrators



Relations with public bodies

Relations with public bodies are conducted in compliance with applicable rules, especially as regards the principles of exactitude, transparency and efficiency.

As an example only:

- Offering or promising money, gifts, compensation, in any form whatsoever, exercising illegal pressure, promising any object, service, performance, favour to various public employees (managers, civil servants, persons employed by public bodies, etc.) or their family or partners, with a view to inciting the performance of an official action or one that goes against the requirements of public duty, is prohibited, whether the approach is made directly or through a third party.
- Behaving in a misleading manner that could lead the authorities to make a mistake, and especially using or presenting false declarations or documents, certifying something that is untrue, omitting information, to benefit the company or on its behalf, in order to obtain subsidies, loans or other financing, granted by the state or a public body or by the European Union, is prohibited.
- Using public money (loans or other receipts) for any purpose other than that initially set out is prohibited.
- Showing simplicity and transparency in relation to the tax rules of the host country is a requirement.



Relations with administrators

Every group subsidiary company has a reporting and transparency duty regarding its financial and extra financial statements. They commit to providing accurate, transparent and regular information so that the group's management can base their decisions on exhaustive information that is accurate and reliable.

The company and its staff members commit to producing proper and sincere accounts that provide an accurate picture of the financial situation, of operational results, of transactions and of the group's assets and liabilities. How these documents are produced must be compliant with accounting practices with entries that are justified by suitable evidence issued by good faith parties.

Rules of conduct

5 Towards the environment and local communities



Environmental protection

Energy and climate related challenges

Our company considers that it is duty bound to act in the face of energy and climate related challenges and it behaves in line with France's National Low Carbon Strategy and UN targets for 2030. This commitment especially shows in the ongoing search for effective solutions for reducing the impact of the company's activities and in the solutions proposed for the entire value chain.

Preserving resources

Our company, in its activities, seeks to achieve the best environmental standards when it comes to preserving resources and managing waste. This commitment especially translates into an eco-design approach applied to all new products (LCA, reparability, recyclability, etc.), a willingness to reduce the carbon intensity of its activities (with a fleet of electric vehicles, eco-driving, etc.), or taking on all forms of waste.

In this context, all of our company staff members, are committed to fight waste, seeking to reduce the carbon footprint and energy consumption of their activities, meeting applicable standards and informing their supervisors of any accident (pollution observed) or failures.



Supporting the local ecosystem

Our company est active in its local ecosystems by supporting the social commitments of its staff members and local initiatives for public or non-profit initiated events. However, it does not make any direct or indirect contributions to political parties, to political and labour movements, committees and organisations and their representatives and candidates, except in forms and under terms set out in applicable law.

Our company further entertains relationships with the media and communication outlets, exclusively through the group communication department. Employees and associates are not permitted to provide information to the media without seeking prior and specific permission from the relevant parties. A **Charter for Using Professional Social Media** determines how to communicate using these channels.

Any information and communication relating to the company must be accurate, complete, truthful, transparent and consistent.



Procedures relating to this code of ethics and conduct

Questioning: the cornerstone of our ethics

If there is any doubt on how to interpret this document, staff members may, within their organisation and fully confidentially, consult their management or HR contact, and these persons can in turn contact their management.

The commitment made by the company through this code of ethics and conduct implies never ignoring any problem relating to it and it incites staff members to not remain silent or not close their eyes to any situation that brings the principles of this code into question.

Staff members must never hesitate to suspend and action or a practice that does not appear to match the code's principles and to ask for advice, where necessary, from the various contact points available so that they can talk about it.



If in doubt about a situation?

Ask yourself a few simple questions:

- Is the situation that worries you legal?
- Does it meet the principles set out in our company's Code of Ethics and Conduct?
- Does it expose the company to unacceptable risks or does it damage the company's interests over the short, medium or long terms?
- Does it correspond to the commitments made by the company and the guaranties given by the group internally or externally?
- How will this situation be considered by other people: your manager, your colleagues or your family?
- Can I talk freely about this question or do I have a conscience issue when I think about it?
- What would happen if this situation was reported in the media or on social media?

The alert mechanism

Our company encourages its staff members to express their points of view, to defend their opinions and to report any unacceptable behaviour or requests. Two paths are open to staff members to raise any such issues: with direct or indirect management channels and using the Vispato platform:

<https://madicgroup-signalements.vispato.com/>

This platform for collecting reports allows staff members and stakeholders to report any serious incident. These alerts may constitute a crime or offence, a serious and manifest violation of the law or of regulations, a threat to public interest or a breach of the code of conduct, especially where there is a risk of, or actual violations of human rights and fundamental freedoms, any impact on personal safety or the environment.

The Vispato platform is based on a system of whistleblowers, accessible 24 hours a day and guaranteeing strict confidentiality, impartial and diligent treatment, protection from reprisals and compliance with national law (the process and terms can be found on the Vispato platform).

An anonymous on-line discussion space allows not only monitoring the processing of the report but also adding clarification and chatting with the people tasked with managing the report. Processing times are as follows:

- 7 days to acknowledge the report
- 90 days to process it



Application of this code of ethics and conduct

All staff members are required to behave in line with this code of ethics and conduct. Leaders are given a special role in this respect, that of setting an example. As contacts, they answer all of the questions relating to principles of behaviour and ensure that staff members are sufficiently informed, especially in their area of responsibility, on company values. Every staff member can contact their manager should they have any question on this Code.

Consequences of failing to comply with the code of ethics and conduct

Breaking any of the rules set out in this code of ethics and conduct affects the trusting relationship established with our company. The latter will have cause to draw all of the consequences of this and this may lead to disciplinary sanctions and possibly a call for compensation. Compliance with this code by staff members and their commitment to fulfil their general duty of loyalty, honesty and to undertake their work contract in good faith must be considered as an essential part of their contractual obligations.

Compliance with the code of ethics and conduct by third parties (suppliers, consultants, etc.) includes the requirement to undertake due diligence and show good faith in negotiations and in undertaking existing contracts with the company. Any violations committed by third parties will be punished in line with the stipulations of the relative transfers and contracts.

Modification of this code of ethics and conduct

The parent company, MADIC HOLDING, is responsible for any modifications to this code of ethics and conduct and/or its integration. This especially covers any additions and modifications that may be necessary due to changes in the benchmark regulation framework or in the internal organisation of the company.





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