

CODE OF CONDUCT OMERIN GROUP

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12 JANVIER 2022

ISSUED BY
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1 | EDITORIAL BY XAVIER OMERIN AND PIERRE SANVOISIN

Our group operates in a multicultural environment, in numerous sectors on international markets and has 16 production sites including 5 abroad in Tunisia, Spain and the USA.

Our products are sold in nearly 120 countries.

The authorities in the countries in which we operate are increasingly sensitive and attentive to actions by companies in the area of responsible behaviour.

We must therefore constantly be in phase with our values.

Compliance with regulations in force in the social, ethical, fair competition and sustainable development areas is a strategic issue. We must address these themes calmly and with vigilance to transform these rules into management tools.

Reflecting on these regulatory provisions upstream, being aware of them and integrating them into our code of conduct has now become a key issue for our Group.

In January 2015, our Group set up a corporate foundation in the framework of its societal commitments. The OMERIN corporate foundation finances the restoration of monuments that are part of our cultural and religious heritage and supports some sixty associations involved in cultural, educational and charitable activities.

Finally, on 5 November 2018, we joined the United Nations Global Compact to voluntarily align our actions and our Group's strategy on the 10 universally accepted principles in the areas of human rights, international labour standards, the environment and the fight against corruption.

This is what has led the OMERIN Group to publish this code of conduct.

Every manager will have access to internal information and resources enabling them to take account of the national and international regulatory environment.

Each of our customers and partners will thus be able to share with us the values that drive us and advance our HSE and CSR action plans.



Xavier Omerin
CEO



Pierre Sanvoisin
Managing Director



2 | THE OMERIN GROUP'S VALUES

The OMERIN Group is renowned for its values, values that are the foundations of this code of conduct.

Employees who act counter to the Group's values or rules of conduct set out in this code cannot claim to be acting in the interest of the OMERIN Group.

Therefore, every employee in the company must comply with all applicable laws and with the OMERIN group's code of conduct.

3 | GENERAL COMMITMENTS BY THE OMERIN GROUP AND ITS EMPLOYEES

The OMERIN Group strives to provide equal opportunities to its employees.

The OMERIN group's employees are hired without discrimination with respect to their ethnic, cultural, community or national origin, to their colour, religion, age, sex, sexual orientation/identity, political opinions, disabilities or social origin.

This also applies to all aspects of employment: reviews, promotions, compensation, training, dismissals, etc.

The OMERIN Group is attached to social dialogue and conducts such dialogue in a sincere and fair manner.

The OMERIN Group respects the privacy of its employees and their families, and is entirely neutral in regards to their political opinions and philosophical or religious beliefs and prohibits any indoctrination in the workplace.

The OMERIN Group undertakes to conduct its activities in compliance with the legislation in force and the highest ethical standards.

4 | ECONOMIC DEVELOPMENT AND ENVIRONMENTAL PERFORMANCE

The OMERIN Group wishes to provide real answers to environmental issues through the development of innovative solutions.

Through these innovations, the OMERIN Group is aiming for economic development while achieving optimal environmental performance.

The OMERIN Group believes that innovation and science are essential levers to take up the many technological development challenges.

5 | RESPECT FOR CULTURES

Because of the OMERIN Group's sites and exports, it has considerable international influence.

The OMERIN group markets its products in over 120 countries.

However, the OMERIN Group wants this deployment to take place in total respect of all cultures. It acknowledges and respects the history of the companies and employees who have joined the OMERIN Group and who are now an integral part of it.



6 COMPLIANCE WITH THE RULES OF LAW

Each employee must know all the rules that apply in their professional fields, including all laws and regulations applicable to their business activities.

Employees are committed to complying with all applicable laws and regulations in every country in which the OMERIN Group operates.

Each person's attention is especially drawn to compliance with laws governing financial regulations and those relating to corruption, competition law, labour, hygiene, safety, health, the protection of the environment and the prohibition of unlawful and child labour.

7 COMPLIANCE WITH OCCUPATIONAL HEALTH AND SAFETY RULES

As regards health and safety, the OMERIN Group undertakes to comply with regulations in force in each country and in the absence of such regulations, with the OMERIN Group's safety standards.

Special vigilance is given to industrial accident and occupational disease risks.

The OMERIN group implements a policy on safety and health which includes procedures for risk assessment and prevention. This policy includes actions, resources (e.g. personal protective equipment, internal emergency plan, etc.) and awareness raising as regards health and safety in the workplace as appropriate to its business activities.

It is up to each employee to comply with safety rules in their work environment and this in a stringent and systematic manner. The safety of every employee, their colleagues and the OMERIN Group as a whole is at stake.

When carrying out their functions, each employee and manager in the OMERIN group must:

- ensure the workplace is a safe and healthy environment;
- develop team work;
- act with the greatest impartiality in their relations at work and focus on the collective interest;
- share acquired skills or knowledge;
- refrain from any harassment or discrimination against an employee.

8 RESPECT FOR THE ENVIRONMENT AND SUSTAINABLE DEVELOPMENT

The OMERIN Group is committed to meeting customer demand by providing high technological quality products and solutions produced in facilities that comply with standards in force in terms of environmental impact.

The OMERIN Group is committed to significantly contributing to sustainable development through rational use of resources in order to reduce its environmental footprint.

Increasing the percentage of energy independence, reducing the consumption of energy and raw materials required for production and ensuring its industrial facilities are compliant, all require that the OMERIN group take all reasonable opportunities that arise to reduce pollution emissions.

The OMERIN group is fully conscious of the responsibility incumbent upon it to protect the environment as well as the health and safety of any person in contact with its products. This concern is at the heart of its business policy.

9 BUSINESS SECRETS

In the course of carrying out their functions, every employee has access to data about the business activities of the OMERIN Group. This information is confidential, in particular information concerning research, products and know-how being developed or sales and marketing action plans.

There are numerous examples of such internal information: knowledge about any intention to acquire an outside company or to set up a joint venture, exclusive information on key products or any specific information about the development of the OMERIN Group that has not yet been made public.

No employee may disclose confidential information to third parties, internally or externally, unless this knowledge is required to carry out a specific project and steps are taken to protect the confidentiality of this information and the non-disclosure thereof to third parties.

Any breach may adversely affect the economic interests of the Group or may cause a breach by the OMERIN Group of agreements it has with its trading partners.

10 INTEGRITY AND THE SAPIN II ACT

Each staff member must comply with the principles of loyalty and integrity towards customers, partners and suppliers. Each contact by a group employee with an external partner is an act by the OMERIN group.

The OMERIN group chooses its partners on the basis of objective criteria. A high level of performance and compliance with the law are required of partners and must be measured.

The OMERIN Group does not accept forced labour or child labour and takes all appropriate actions with respect to its suppliers and partners to ensure they act in the same way. Our benchmark standards are the set of conventions of the International Labour Organization and the United Nations Convention on the Rights of the Child.

No employee may accept a significant gift or advantage from a third party. Similarly, no employee may offer or grant such gifts or advantages in order to sign a deal.

No employee may behave in a complacent manner with respect to active corruption (offering something in exchange) or passive corruption (accepting something in exchange). Any abnormal situation must be immediately reported to a superior.

The OMERIN group will not tolerate any act of corruption. This rule is of particular importance in the context of negotiations with representatives of government agencies or other public institutions.

It is recalled with respect to this that the French Act of 9 December 2016 on transparency, the fight against corruption and the modernisation of economic life, called the "Sapin II" act, introduced an obligation to implement internal risk prevention procedures.

Pursuant to this obligation, the OMERIN group has taken steps to support the fight against breaches of integrity, by establishing, through procedures and/or specific instructions and/or any other document brought to the attention of all employees:

- a general obligation to prevent and detect any acts of corruption committed or influence peddling;
- protection of whistle blowers.

Integrating the prevention of corruption into the OMERIN Group helps develop good governance practices and reinforces a culture of risk prevention and detection to the benefit of our competitiveness.

All employees must therefore comply with this internal policy.



11 | COMPLIANCE WITH COMPETITION LAW

The activities and employees of companies in the OMERIN Group must comply with the laws of numerous countries all over the world, including statutory competition law rules.

Competition rules prohibit agreements (such as cartels), behaviour and relations between companies and any other practices between competitors when such relations and/or practices are intended to or have the effect of preventing, restricting or distorting competition in a market.

Any breach of applicable rules can result in heavy fines or even the outright cancellation of the transaction.

12 | COMPLIANCE WITH INTELLECTUAL PROPERTY RIGHTS

Just like its brands, the OMERIN group's intellectual property rights are of paramount importance to the future of the Group and are of fundamental value.

Each employee in the OMERIN group must make every effort to ensure that the OMERIN Group's intellectual property rights benefit from full legal protection. Each employee must also comply with the property rights of others in force and acknowledged by law, and must not use such rights without the authorisation of the holder of these rights.

13 | PERSONAL DATA PROTECTION

Given its activities, the OMERIN group undertakes to comply with regulations in force on the protection of personal data in the very near future.

Each staff member and employee in the OMERIN group will also be required, by law, to comply with this regulation.

The GDPR (General Data Protection Regulation) was adopted by the European Parliament on 14 April 2016. It has been in force since 25 May 2018. It provides for new rights for individuals:

- the right to portability;
- the right to restriction of processing;
- the right to be forgotten;
- the right to be informed.

A DPO (Data Protection Officer) has been appointed and is leading a working group to establish the structures and tools required to meet these new legal provisions.



14 | DUE DILIGENCE CONCERNING MINERALS

Mining for cobalt, gold, mica, tantalum, tin or tungsten is an intensive process that involves certain social and environmental risks, which can result in long-term negative impacts.

The OMERIN Group is fully aware of its responsibility in relation to such operations, notably in terms of ensuring compliance with human rights and child labour laws, and protecting the health and safety of the people who extract and mine these minerals.

In accordance with the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the OMERIN Group therefore undertakes to:

- Refrain from any act that may contribute to financing conflict, and comply with the applicable United Nations' resolutions, or, if relevant, with the national or international laws that implement those resolutions,
- Publish and clearly communicate its policy on responsible supply chains of minerals from conflict-affected and high-risk areas,
- Organise internal management systems to support supply-chain due diligence,
- Implement a system to monitor and ensure the transparency of the mineral supply chain by identifying all our suppliers' upstream operators,
- Design and implement a strategy to address any risks identified.

