



## **CODE OF ETHICS 2021 - V2**

Castingpar Group

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## Our Values

**Integrity** - always being honest in our intentions

**Respect** - meeting our commitments

**Courage** - facing challenges with resolve and confidence

**One team** - we succeed together

**Continuous improvement** - we are always looking for ways to improve

These are Castingpar's core values. Our group prides itself on conducting its business in an ethical manner. Failure to do so could seriously damage our business.

This code sets out the basic principles of our relationship with all our partners. All Castingpar employees - as well as agents and other representatives of the group - have a duty to ensure compliance with this code. Managers have a particular duty in this regard. All employees and agents will be required to confirm annually that they have read and understood the code and are not aware of any breaches of it.

The code will be available in our different working languages. We will provide ongoing training on various aspects of its application. This code sets minimum standards across the group. In some cases, the Group or its divisions may develop additional policies that impose more stringent requirements in a particular area.

Castingpar is committed to ensuring the highest standards of compliance. Our employees and agents can be confident that strict adherence to these standards will be supported by the Board of Directors and management, even at the risk of adverse consequences to the Group's business. Failure to do so will be grounds for disciplinary action or other appropriate action.

If you are unsure of what to do in a particular situation, if the application of the Code or a particular law or regulation is difficult to interpret, or if you are aware of a violation of this Code, you should raise the matter with your supervisor or your local Human Resources representative.

The way we conduct our business is really important to me and to the whole management. I count on all of you to respect and apply this code.

**Philippe HOSTE**

CEO - Managing Director

Castingpar Group

## B. Relations with workers

<b>Introduction</b>	We recognise that in order to achieve its objectives, the company has a strong interest in being an employer of choice, with a positive, responsible, open and exemplary working environment.
<b>Values</b>	Relations with workers are based on respect for the dignity of the individual and the fair treatment of all, as well as a commitment to defend the interests and reputation of the company, both in public and in private.
<b>1. Discrimination</b>	<p>We strive to maintain an environment based on merit and inclusiveness. The company will recruit and promote employees, if they are qualified for the job and suitable for the company's needs, without discrimination, including race, religion, national or ethnic origin, colour, gender, sexual orientation, age, marital status, disability unrelated to the job, union membership or political affiliation.</p> <p>We value diversity.</p> <p>All workers will be treated with equal dignity and respect. Their opportunities to develop and advance their careers will be equal.</p> <p>We expect our workers to conduct their professional activities with colleagues, clients, stakeholders and business partners in a manner that respects all people, regardless of differences or similarities.</p>
<b>2. Communication</b>	The company will explain the purpose of its activities and individual functions, promote effective communication and involve workers in improving their work and the company as a whole. It is committed to defending the interests and reputation of the company, both in public and in private.
<b>3. Personal development</b>	The company will provide opportunities for workers to enhance their skills and abilities, enabling them to have rewarding careers and maximise their contribution to our business.
<b>4. health, safety and security</b>	<p>The company places a high priority on the health, safety and security of workers and their working environment, in line with industry best practice. The company will act to prevent the exposure of workers to personal safety risks at all times.</p> <p>Workers, for their part, have a duty to take all reasonable precautions to avoid injury to themselves, their colleagues and members of the public. This includes not reporting to work under the influence of any substance that may prevent safe and acceptable conduct.</p>
<b>5. child and forced labour</b>	We do not use child or forced labour in any of our operations.

<p><b>6. use of the company's assets, including intellectual property and computer resources</b></p>	<p>The company's time, as well as its physical and intellectual property, must be used for the purposes of the company, unless another use has been authorised.</p> <p>The company's electronic communications equipment and related services (e-mail, Internet, bulletin boards, fax machines, file storage, etc.) must be protected from unauthorised external access or use. Under no circumstances should they be used to receive illegal, offensive, obscene or inappropriate material.</p>
<p><b>7. data protection</b></p>	<p>The company respects the privacy and dignity of workers. We will only collect and retain personal data of employees that is necessary for the efficient operation of the company or required by law. We will maintain the confidentiality of such data and will only disclose it to those who have a legitimate need to know in accordance with the GDPR.</p>
<p><b>8 Insider trading and confidential information</b></p>	<p>Information received by workers in the course of business relationships may not be used for their own benefit, nor for the benefit of their families and friends.</p> <p>Workers may obtain confidential pricing information about customers, suppliers, or other companies with whom they deal. Individuals must comply with applicable laws and regulations that prohibit trading on inside information. Insider trading is legally prohibited in many countries where the company operates.</p>
<p><b>9 Conflicts of interest</b></p>	<p>None of the workers may participate in any activity that provides personal gain in conflict with the company's business interests. All personal interests, or those of an immediate family member, relating to the company must be disclosed. A conflict of interest could arise from mandates, significant shareholdings or employment of family members.</p> <p>In addition, workers cannot simultaneously work for a competitor, a client or a supplier. Conflicts of interest are not always obvious. If you have a question, consult your line manager, the Human Resources Department or the Legal Department. It is your responsibility to act and resolve any real or perceived conflict of interest.</p>
<p><b>10. Harassment and bullying</b></p>	<p>The company will not tolerate any form of sexual, physical or mental harassment and intimidation of its workers. Workers must be open, honest and courteous with each other.</p>

<b>11. Disputes/Grievance Procedure</b>	<p>If a worker has an issue that cannot be resolved with their line manager, the company has a grievance procedure to deal with the issue quickly and fairly, ensuring that our workers :</p> <ul style="list-style-type: none"> <li>• are properly listened to, when they express grievances</li> <li>• have the right to take the matter to the next level, if appropriate</li> <li>• have the right to appeal</li> </ul> <p>We find a solution to workers' grievances as quickly as possible.</p>
<b>12. Helpline</b>	<p>The company has a helpline run by an independent body. It can be used anonymously, if a worker feels that they have no other appropriate way to express their concerns. Contact details for the helpline are available on notice boards at all sites.</p>
<b>13. Freedom of association</b>	<p>While the company ensures the best communication with each worker as an individual, it recognises the need to develop effective processes for communication and consultation with workers in the natural groupings in which they work and, where appropriate, for individuals to be adequately represented in negotiations. We recognise the right of our workers to freedom of association and will respect agreements reached with trade unions.</p>
<b>14. Clear and fair conditions of employment</b>	<p>The company is committed to respecting the terms and conditions of employment of workers, and requires managers and workers to do the same. The company is committed to providing fair pay, benefits and conditions of employment. It will seek agreement where changes are necessary to meet business needs.</p>
<b>15. Work/life balance</b>	<p>The company ensures that its employees find a balance between work and private life. Particular emphasis is placed on the reconciliation of family life and the career of employees.</p>
<b>C. Customer relations</b>	
<b>Introduction</b>	<p>Our reputation and the loyalty of our customers depend on how we conduct our business. The confidence of others in our professional excellence, competence and product quality, and the belief that our products and services are valuable, are essential to our sustainability.</p>
<b>Values</b>	<p>We will treat our customers with respect, honesty and fairness.</p>

<p><b>1. Customer requirements</b></p>	<p>The company will provide high value products and services, and consistent quality, reliability and safety.</p> <p>It will provide a high quality service to its customers to maintain their satisfaction and cooperation.</p> <p>It will fulfil all the requirements and specifications laid down in the contract with the customer and will endeavour to meet its delivery obligations on time and in full.</p> <p>It will charge fairly for its products and services.</p>
<p><b>2. Sales and marketing practices</b></p>	<p>Lying, concealment and overstatement will be avoided in advertising and other public communications.</p> <p>The company will market the products and services produced in accordance with agreed national and international standards.</p> <p>It will not deliberately give inadequate or misleading descriptions of products or services.</p>
<p><b>3. Workers' relations with clients</b></p>	<p>No worker or agent shall make any payment or kickback or offer any undue advantage to a client or an entity controlled by a client, or any of its workers, for the purpose of obtaining contracts or other services.</p>
<p><b>4. Gifts and invitations</b></p>	<p>Gifts and invitations may only be given to existing and potential customers in the normal course of business, provided they are reasonable and appropriate. They must not affect the objectivity of the recipient or be construed as a means of making them feel obliged. You must, of course, always seek to comply with the laws applicable in this respect in the country in which you operate.</p> <p>All offers of gifts, hospitality or favours of a value in excess of the limits set out in Castingpar Group's Anti-Bribery Policy (available from the local Human Resources Manager) must be disclosed in the relevant site's Gift Register. In some cases, prior approval of gifts is also required.</p>
<p><b>5. Privacy</b></p>	<p>The company respects client confidentiality and protects client assets, including all confidential information and intellectual property, in whatever form.</p>

**D. Relations with suppliers, subcontractors and agents**

<p><b>Introduction</b></p>	<p>To strengthen our market relationships and develop business opportunities, we must have a reputation for managing all aspects of our business with our business partners in a mutually beneficial and open manner.</p>
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<b>1. Selection of suppliers and subcontractors</b>	<p>Decisions to engage a subcontractor or to source materials from a particular vendor or supplier are made on the basis of objective criteria such as quality, reliability, technical excellence, price, delivery, service and maintenance of adequate sources of supply. Purchasing decisions cannot be made on the basis of personal relationships and friendships, nor because of the possibility of personal financial gain.</p>
<b>2. Payment of suppliers</b>	<p>The company will pay its suppliers, subcontractors and agents in accordance with the agreed terms.</p>
<b>3. Gifts and invitations</b>	<p>Significant favours or gifts to workers or agents from suppliers and other business partners can lead to embarrassment and be seen as an improper inducement to grant a concession to the donor in compensation. The following principles should be respected:</p> <ul style="list-style-type: none"> <li>• Gifts, invitations and favours should not be requested;</li> <li>• Cash gifts, or equivalent gifts such as gift certificates, should never be accepted;</li> <li>• Occasional reasonable invitations and small reasonable gifts may be accepted, provided that they do not imply any obligation on the part of the recipient, are not likely to be misinterpreted and can be returned in an equivalent manner;</li> <li>• All offers of gifts, hospitality or favours of a value in excess of the limits set out in Castingpar Group's Anti-Bribery Policy (available from the local Human Resources Manager) must be disclosed in the relevant site's Gift Register. In some cases, prior approval of gifts is also required;</li> <li>• Registers to record gifts, invitations and favours that are given or received are designed in a way that allows traceability.</li> </ul>
<b>4. Confidentiality and data protection</b>	<p>All confidential information relating to our relationships with suppliers will be respected as such, in accordance with the GDPR.</p> <p>We also respect the copyright and other intellectual property rights of our suppliers.</p>
<b>5. Chain supply</b>	<p>Suppliers will be selected, the first and subsequent times, solely on the basis of merit, in accordance with the company's procurement policy.</p>
<b>6. Code compliance</b>	<p>When subcontractors, agents and other third parties act on behalf of the company, they are expected to comply with the standards set out in this code. Where possible, the obligation to comply with the code should be incorporated into contracts with third parties.</p>
<b>7. Agents</b>	<p>The company's procedure for engaging and retaining agents and other parties who may act on our behalf must be followed, and payments to agents and other parties may only be made to agents approved in accordance with that procedure.</p>



<b>8. Commission payments.</b>	Commissions or fees paid to agents and consultants must be reasonable for the services provided. Workers or agents must not pay or commit to paying commissions or fees that could be considered improper payments. Agreements with consultants, brokers, promoters, agents or other intermediaries shall not be used to make payments to one or more persons, including officials or workers of clients.
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## **E. Relations with governments and local authorities**

<b>Introduction</b>	The company recognises that business success depends on compliance with legal constraints, sensitivity to local business customs and conventions, and a commitment to contribute positively to the sustainable development of the communities in which it operates.
<b>1. Respect for the law and local customs</b>	<p>The company complies with all laws and regulations wherever it operates. Where we consider them to be insufficient or ambiguous, our goal is to set a high ethical standard that goes beyond the basic requirements of the applicable law.</p> <p>The company is committed to respecting the traditions and cultures of each country in which it operates. If there is a discrepancy between local customs and the principles and values set out in this Code, you must apply the higher standard of conduct, whether it is found in the Code or in local regulations.</p>
<b>2. Relations with local authorities</b>	The company respects the local authorities in the countries where it operates. It is therefore imperative that workers maintain an honest, transparent and ethical relationship with the authorities, its institutions, agents and staff. Workers and agents should ensure that when providing company information to government officials, it is accurate, complete and complies with applicable laws and regulations on corporate involvement in public affairs.
<b>3. Involvement of workers in the community</b>	Workers are encouraged to participate in community and civic activities. However, they are expected to avoid any personal interests or external activities (non-profit or otherwise) that interfere with their obligations to the company.
<b>4. Political donations and lobbying</b>	<p>The company does not participate directly or indirectly in the activities of political parties. It does not make payments to political parties or politicians. We make our views known to the authorities and others on matters affecting our business interests and those of shareholders, workers and others involved in our business.</p> <p>If a political contribution is requested from a worker or agent as part of contract discussions, no donation should be made and this request should be reported to the group's legal officer.</p>

<b>5. Relations with officials of the authorities</b>	No worker should make any payment or kickback, or offer any undue advantage to an official of an authority or of an entity controlled by an authority, for the purpose of obtaining contracts or other services, as provided for in the OECD Convention on Combating Bribery of Foreign Public Officials.
<b>6. Facilitation payments</b>	<p>Facilitation payments are small payments or gifts to low-level public officials to "facilitate" certain actions or approvals. Such payments may be illegal to some extent, so we prohibit any type of facilitation payment, direct or indirect, by any worker or agent, worldwide.</p> <p>HOWEVER, IF YOUR SAFETY IS AT STAKE OR IF YOU RISK LOSING YOUR FREEDOM, DO NOT REFUSE PAYMENT. Whenever a request is made for a facilitation payment, it should be reported immediately to the group's legal officer.</p>
<b>7. Taxation and money laundering</b>	<p>The company will not knowingly avoid its tax obligations.</p> <p>The company will record and report all transactions, including those where payment is made in cash.</p> <p>All taxable benefits to which workers are entitled will be recorded and reported for tax purposes.</p> <p>We will endeavour to ensure that they are not used for money laundering, drug trafficking, arms trafficking, human trafficking or tax fraud.</p>

## **F. Relations with competitors**

<b>Introduction</b>	The company recognises that maintaining a "level playing field" is good for business and customers, while promoting fair play and healthy competition.
<b>1. Competition law</b>	The company fully complies with competition rules and anti-trust laws worldwide.
<b>2. Anti-competitive practice</b>	<p>The company's competition policy must be followed.</p> <p>The company will not engage in anti-competitive practices or abuse a dominant market position.</p> <p>We will not establish contacts with competitors to discuss prices, markets or customers.</p> <p>The company will not damage the reputation of competitors, either directly or by innuendo.</p> <p>We will not enter into any agreements - formal or informal - with competitors to fix/determine prices or allocate products, markets, territories or customers.</p> <p>We will not abuse our market position.</p>

<b>3. Competitive information</b>	<p>The company will not attempt to obtain information about a competitor's business by unsavoury means. This includes industrial espionage, urging competitors' staff or customers to disclose confidential information, or any non-transparent approach.</p> <p>We may collect business information by lawful means, such as an aggregate industry data exchange that does not disclose specific company information; the compilation of the data is done by an independent third party to maintain confidentiality.</p>
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## **G. Relations with shareholders and other investors**

<b>Introduction</b>	We recognise that the company's success in the market requires the confidence of the financial community.
<b>Values</b>	The company will protect the interests of shareholders and other investors and will not do anything that favours one class of investors at the expense of another.
<b>1. Shareholder Value/Financial Governance</b>	The company's objective is to generate an attractive return for investors through the responsible use of its assets.
<b>2. Corporate governance</b>	The company is committed to high standards of corporate governance and to complying with the provisions set out in the FSMA's recommended guidelines for private equity disclosure and transparency.
<b>3. Internal controls</b>	We confirm our commitment to an effective system of internal control. The company's accounting records will be correct, up-to-date and complete. The material will be available in an easily understandable format.
<b>4. Communication</b>	The company will communicate its policies, achievements and business prospects in an honest and timely manner.

## H. Health and Safety

### Basic principles

Castingpar is committed to the highest standards of health and safety, applying the principles of the international standard ISO 45001.

Our priorities are as follows:

- 1) protect staff and the company from health and safety risks that may arise from our work activities;
- 2) promote a health and safety culture in which each of us accepts our share of responsibility,
- 3) ensure the proper management of occupational health, safety and welfare as an ethical and business imperative.

### TO DO

- Look after your own health and safety and that of others.
- Identify and reduce health and safety risks before you start work.
- Report any danger to safety, health or integrity at work.
- Aspire to zero accidents or cases of work-related illness



### DO NOT

- Compromise on health and safety.
- Ignoring health and safety rules and procedures.
- Turning a blind eye when others are working in dangerous conditions.
- Failing to report accidents to your direct manager or your Prevention Advisor



### Q&A

#### What should I do if there is a safety risk?

You must stop what you are doing and ensure the safety of yourself and others before returning to work. You must also report any safety concerns immediately to your line manager or your Prevention Advisor.

#### What should I do in case of an accident?

You should first take immediate action to prevent further damage and seek help if necessary. You should then report all accidents and incidents to your line manager or Prevention Advisor and record the event in accordance with company requirements. The lessons learned from your accident may prevent others from being injured in the future.

#### What should I do if I don't have my personal protective equipment (PPE)?

You should never work without the required PPE. Ask your line manager or your Prevention Advisor how to obtain the appropriate PPE and, if necessary, the required training.

## I. Environmental responsibility

The company will prevent, or at least minimise, mitigate and remedy the adverse effects of its activities on the natural environment. Therefore :

- It will define desirable and achievable environmental quality standards and fully comply with all applicable environmental regulations;
- It will ensure that its manufacturing activities and policy on water discharges, waste management, air emissions and noise emissions comply with mandatory controls and regulations;
- It will take into account the likely environmental impact of new products, processes and services from the very beginning of the development phase;
- It will regularly review and report on the environmental performance of its operations.

## J. Implementation and monitoring of this Code

### Introduction

This code applies to all workers and agents. The company's commitment to this Code of Ethics is considered essential to its business success. Our training systems, implementation and accountability, and our policies and communications will demonstrate this.

### 1. Respect and responsibility of managers and supervisors

Strict adherence to the provisions of this code is a requirement for working for the company. Managers and supervisors must ensure that workers and staff understand this code and the values that underpin it and are aware of the requirements for their work.

### 2. Protection of workers

The company's aim is to create a culture in which it is normal for workers to 'do the right thing' and to express genuine concerns about behaviour or decisions that they consider unethical.

Any concerns can be shared with your line manager or site compliance officer, as well as with any member of the company's or any of its divisions' compliance committees.

The company shall ensure that workers are protected if compliance with the code jeopardises the achievement of financial or other objectives.

### 3. Training

We will implement this code throughout the company by introducing appropriate training for workers and agents, and by making ethics training part of the core curriculum for new workers. Ethical awareness and compliance, more generally, will be the subject of regular training sessions in which concrete issues will be addressed.

### 4. Absence of retaliation

Retaliation or revenge against those who report problems violates the ethical principles of the company and will not be tolerated.

<p><b>5. Investigation/Disciplinary measures</b></p>	<p>The Group Compliance Committee is responsible for initiating and overseeing the investigation of all reports of violations of this Code and for ensuring that, if necessary, appropriate disciplinary action is taken.</p>
<p><b>6. Monitoring and reporting</b></p>	<p>The company will regularly review ethical performance, associated risks and compliance standards. Compliance with the code will be monitored in a number of ways which may include internal and external audits, employee surveys and the use of the hotline.</p>
<p><b>7. Suspension of the code</b></p>	<p>No part of this Code taken in isolation may be set aside or suspended.</p>
<p><b>8. Self-certification</b></p>	<p>All workers and agents will be required to sign an annual "declaration of compliance", confirming that they have read the code, that they have complied with it, and that they are not aware of any violations of the code by others.</p>
<p><b>9. Revision of the code</b></p>	<p>This code will be regularly reviewed and amended to accurately reflect the requirements and business of the company and the concerns of its workers. If you wish to comment on this code, please write to the company's Administrative Director.</p>
<p><b>10. Complementary policies</b></p>	<p>This code is intended as a guide rather than a comprehensive description of the company's policies and ethical standards. Additional information and a list of related documents can be found on the business website, which provides information on a number of issues, including</p> <p>Commercial agents; Export controls; Data protection; Competition and anti-trust rules ; Castingpar's accounting policies and procedures; Risk and insurance; Anti-corruption policy.</p>

## K. Guidance and assistance to workers and agents

<b>1. Advice and guidance</b>	<p><b>Ethical testing</b> <b>YOUR ETHICAL COMPASS</b> This code cannot cover every situation. You may be faced with ethical questions that are difficult to resolve. Whenever you are in such a situation, ask yourself the following questions before you do anything:</p> <ul style="list-style-type: none"><li>• Is it legal and ethical?</li><li>• Is this in line with our values and code of ethics?</li><li>• Could I explain my decision to my family and friends?</li><li>• Would I feel comfortable if this story was published in a newspaper?</li></ul> <p>If you are not sure whether an action is ethical or legal, seek further advice first. Ask your supervisor or manager who is the most appropriate person to help you resolve an ethical issue. You can also contact the company's helpline to raise a particular issue and seek advice. Keep asking questions until you are sure you have 'done the right thing'.</p> <p><b>Alarms</b> WARNINGS - YOU ARE ON AN ETHICAL MINEFIELD IF YOU HEAR SOMEONE SAY :</p> <p>"Come on, just for once..." "No one will ever know..." "It's all about the result." "It's too good to be true." "Everyone does it." "Tear up this document." "We can keep it a secret." "No one will be affected." "What's in it for me?" "It will destroy competition." "We never had this conversation." "This meeting is unofficial."</p>
<b>2. Raising a problem (denouncing)</b>	<p>If you believe that a provision of the code has been or is being breached, your responsibility is to raise your concerns with someone who can deal with the situation. You can do this through normal reporting channels, by contacting human resources, by alerting your site's compliance officer or by contacting the company secretary.</p> <p>If you prefer, you can use the helpline to report a suspected infringement by telephone or internet. Your concerns will be taken seriously and an investigation will be promptly carried out. If you wish, your anonymity will be protected and appropriate action will be taken. Assistance will be offered at every stage.</p> <p>We will make every effort to protect the confidentiality of those who raise issues. We will not criticise someone for raising a concern, or for not raising it earlier.</p> <p><b>Non-reprisal policy</b> We will not allow retaliation if workers or agents report in good faith the misconduct of others.</p> <p>We will regard any attempt to prevent workers and officers from raising issues as serious disciplinary misconduct.</p>