



lebronze alloys

Code of ethics & conduct



Table of Contents

A word from the Chairman.....2

Foreword: purpose and scope of the code3

Code of conduct

1. Compliance with national and international laws and standards.....4

2. The fight against all forms of corruption4

3. Respecting the heritage of our Group6

4. Building relationships of trust with stakeholders in our markets.....6

5. Respect for employees.....8

6. Participating in the sustainable development of human activities.....8

7. Sanctions.....9

8. Alerts regarding breaches of the Code of Ethics and Conduct.....9

A word from the Chairman



Lebronze alloys is a leading group in the production and distribution of specialised metal products. We offer our customers a wide range of products as well as support and development and we have a capacity for innovation to support our growth.

We are proud of this value proposition, which positions us as a major player in the circular economy, the energy transition, sustainable electromobility and, more generally, the migration towards industry which is more respectful of the environment and humanity.

Without creating an exhaustive list of all the actions we are taking in this direction, I would remind you that Lebronze alloys adheres to the United Nations Global Compact and participates in various assistance programmes covering health and human rights. At the same time, we are investing heavily in technologies to successfully bring cleaner and more recyclable products to the market.

This dynamic is based on the commitment of all our employees and on the trust of our partners. We must therefore constantly earn this trust by implementing the best ethical and behavioural practices.

The economic and financial growth of our Group must therefore be accompanied by growing demands for transparency, thoroughness and fairness.

As such, I asked for this Code of Ethics and Conduct to be implemented, which I will personally ensure is strictly respected. I am counting on each and every one of you to promote it and act according to its provisions in all circumstances.

Michel Dumont
Chairman

Foreword: purpose and scope of the code

The purpose of our Code of Ethics and Conduct is to present the principles that guide the actions of our Group in its internal and external relations. This Code defines our expectations regarding our employees in their day-to-day decision-making and in their relations with other stakeholders.

Our Code of Ethics and Conduct is the reference document for each employee - hereinafter referred to as "employees". Each of them is required to respect the Code.

Our Code of Ethics and Conduct is available on our website. It is also given to each new employee at the time they sign the employment contract.



Code of conduct

1. Respect national and international laws and standards

Our Group's reputation for integrity is built on respect for the laws, regulations and other obligations in force, whatever the country in which our Group is established.

It is up to each employee to respect the laws and regulations applicable to their tasks.

Our Group operates in different countries with varying demanding regulations. Our ethical goals impose standards that may be more demanding than local legislation. As a member of the United Nations Global Compact, we are committed to respecting human rights and fundamental universal principles that protect the dignity, respect and freedom of all employees.

In particular, our Group strongly condemns:

- All forms of forced or compulsory labour.
- Child labour.
- All differences in treatment between individuals based on criteria other than their skills or abilities.
- Any act of physical or mental violence, or the threat of such acts.

2. The fight against all forms of corruption

Our Group fights against corruption in all its forms, whether active or passive, direct or indirect, affecting private or public persons. Employees are prohibited from promising, offering, soliciting or accepting, directly or indirectly, benefits in any form that contravene the laws and regulations in force in order to obtain, retain, grant or renew a contract or a business advantage or to obtain a personal benefit.

To this end, the instructions to be applied are as follows:

Gifts and invitations

The occasional acceptance or offering of gifts or invitations of modest value is a legitimate practice in business relations, but they must be in accordance with the law and adapted to the customs of each country.

Employees are prohibited from offering or accepting gifts or invitations, whatever their form, which:

- May affect decision-making processes or be perceived to do so by the givers or recipients.
- Are in violation of laws, regulations or the instructions in force within our Group.
- Have a value greater than the equivalent of 100 Euros per year and per business partner, whatever their form (sums of money, goods, services, travel).

Financing of political parties

The disbursement of funds and/or the provision of services on behalf of our Group to a party or political organization and political figures are prohibited.

Donations to charities and sponsorship

Donations to charitable organizations and sponsorship on behalf of our Group must comply with the laws, the regulations and the instructions in force within our Group and are subject to authorization by the Group's Management.

Lobbying

Our Group participates transparently in public policy debates and legislative processes related to its field of activity.

These actions must in no way lead to offers or promises of benefits in kind or in cash to third parties.

All lobbying is subject to authorization by Group Management.

Management of conflicts of interest

Our Group avoids all situations in which the personal interests of an employee or those of natural or legal persons with whom he/she is associated, could be in conflict with the interests of our Group. To determine if there is a conflict of interest, each employee must ensure that he or she is acting in the best interests of our Group, to the exclusion of all other considerations, including personal ones.

The following situations may be considered as likely to lead to conflicts of interest:

- The acquisition of an interest, whether direct or indirect, in a competitor, a supplier, a service provider or a customer (current or potential), except for the purchase of listed securities in accordance with the rules regarding inside information.
- Any professional or personal commitment outside our Group that could affect commitment to our Group, except with the prior authorization of the management.

All potential conflicts of interest must be brought to the attention of the management.

Anti-money laundering

Our Group implements all appropriate measures to prevent all forms of money laundering in the course of its business. The Group asks its employees to prevent the following situations:

- Transactions in which we do not know the names and contact details of the parties.
- Transactions conducted by unknown or unnecessary intermediaries.
- Useless or unexplained transactions.
- Unusual methods of payment.

3. Respecting the heritage of our Group

Respect for confidentiality

Our Group protects its confidential data and that belonging to third parties.

All employees must therefore refrain from disclosing confidential information of which they become aware during their work.

They are also responsible for preserving the intellectual property rights, including industrial rights, of our Group and for not harming those of third parties.

Whenever exchanging information externally, all confidentiality agreements in force must be respected.

Accuracy of management documents

The reports and accounts produced by each entity of our Group must faithfully reflect all operations performed out by its entities (assets, liabilities, expenses, etc.). Each employee must ensure that all information and reports are submitted to each level of the Group in a timely manner and are accurate in that they include all transactions taking place.

Asset protection

Each employee must protect the assets (tangible and intangible) of our Group against degradation, theft or misappropriation and, in particular, use for personal purposes.

4. Building relationships of trust with stakeholders in our markets

Respect for fair competition

Competition law regulations are designed to ensure fair competition between companies in the market. Our Group undertakes to scrupulously respect the competition rules applicable in the various countries in which it is present. As such, each employee agrees to refrain from participating in agreements with competitors whose purpose or effect is:

- To set prices and commercial conditions.
- To assign contracts or customers, particularly in the context of calls for tenders.

Balance and control of relationships with stakeholders *Relationships with customers*

Our Group always tries to meet the needs of its customers by being available, listening to customers and taking the initiative.

Our Group is committed to:

- Providing quality products and services to its customers and to constantly improving its technologies and methods with a strong demand for innovation and security.
- Proposing delivery times that do not limit market access.
- Developing partnerships with our customers as soon as possible in order to reduce environmental impacts (energy consumption, waste recycling, fair quality...).

Relationships with suppliers and subcontractors

Our Group strives to develop relationships of trust and partnership with its suppliers in order to best meet the expectations of its customers.

The consideration of each other's interests and the respect of fair contractual terms constitutes the basis of the relationships between our Group and its suppliers.

Our Group encourages its suppliers and subcontractors to adopt ethical principles and environmental responsibilities equivalent to its own, and reserves the right to audit their practices or have them audited, and to take into account the results of these audits in its decisions.

Relationships with sales agents and intermediaries

Our Group uses sales agents and intermediaries (brokers, distributors).

These relationships are governed by contracts.

The selection, the expected services and the remuneration of these sales agents and intermediaries must be strictly controlled by each employee concerned and comply with all internal rules.

Export control

All employees involved in international business operations must comply with the laws and regulations governing export restrictions on products and services. Employees can ask for support from the Legal Department if necessary.

Transfer pricing

The transfer prices of goods and services between Group entities must comply with all applicable tax laws and regulations. The Control Department enacts the rules and oversees their application; the employees concerned may ask for support if necessary.

Communication

Our Group has appointed responsible persons in charge of communication with the media, the financial community and the regulatory bodies. All requests addressed to employees (e.g. interviews, public interventions, taking positions etc...) must be sent to the persons designated by our Group for this purpose.

5. Respect for employees

Employee relations

Our Group reaffirms its commitment to the following principles of social responsibility, including:

- The application of national laws and applicable international conventions.
- Respect for human rights and fundamental universal principles that protect dignity, freedom and respect for employees.
- A constantly improving work environment, aimed at ensuring the physical and mental integrity and health and safety of staff.
- The right of employees to associate and take part in collective bargaining procedures.
- The employment of permanent staff whose numbers are adapted to the sustainable level activities, professional training, compliance with regulations on working hours, participation of the employees in a process of continuous advancement, a policy of equitable and motivating remuneration, maintenance of the employability of all staff.

Non-discrimination when hiring

Our Group offers equal employment opportunities to all without discrimination based on age, gender, sexual orientation, disability, race, religion, citizenship, marital status, family status, country of origin or any other factor, in accordance with the laws in force in each country in which the Group is present.

Protection of personal data and proper use of digital tools

Our Group is committed to complying with all applicable laws regarding the protection of employees' personal data.

Each employee is bound to respect the rules for the proper use of the applicable IT and telecommunication tools. Employees will give the same care to emails as to any other type of professional communication. Internet access and the computers of our Group must never be used to view, send or download inappropriate content.

6. Participation in the sustainable development of human activities

Environmental protection

Our Group is a player in energy transition and sustainable electro-mobility through its offering of products and services. We are also developing high-tech solutions to improve human health and promote economic development compatible with the preservation of the environment.

Our Group is fundamentally committed to respecting and protecting the environment and biodiversity in its industrial and logistics operations, in particular through:

- The optimal use of metals and components to limit the consumption of natural resources.
- The recovery of rejects and waste materials.
- Prevention of pollution of all kinds.
- The reduction of water use.
- Optimization of energy consumption for our processes and reducing carbon emissions.
- The implementation of clean and safe technologies.
- The development of antimicrobial products to prevent the manual transmission of pathogenic bacteria.

7. Sanctions

Failure to comply with any of the rules listed above may constitute an offence in countries in which our Group operates. Employees who violate the Group's Code of Conduct are therefore liable to prosecution. For its part, the Group will institute appropriate disciplinary procedures in the event of acts contravening this Code, while respecting the social legislation of each country.

8. Alerts regarding breaches of the Code of Ethics and Conduct

Employees who become aware of any breach of the rules set out in this Code may decide to report it using the internal alert procedure, available from your Human Resources Department and at the following URL link <https://alert.lebronze-alloys.com>

This system is designed to be a tool for additional freedom of expression made available to employees. No-one may be sanctioned, dismissed or discriminated against for having testified in good faith, or for reporting acts contravening the Code.

