



2025



lebronze alloys

Partner Code of Conduct

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Management commitment

The Lebronze alloys Group is a world leader in the metallurgy of high specialty copper and nickel alloys. Our raison d'être, enshrined in our bylaws, is to:

"Consolidate and amplify know-how in the production and recycling of alloys based mainly on copper and nickel, to respond responsibly to the technical and environmental challenges of user industries."

We are convinced that the success of our commitment to responsible industry depends on a relationship of trust and collaboration with all our Partners.

Our vision of partnership

At Lebronze alloys, we see our Partners as key players in our ecosystem. This term covers:

- Our **suppliers and subcontractors**, who support us in the production and delivery of our products and services;
- Our **customers**, who share our high standards of quality, innovation and environmental responsibility;
- Our **investors and shareholders**, who support our long-term development;
- Our **technology partners**, who contribute to sustainable research and innovation;
- Our **intermediaries and business partners**, who make our transactions smooth and secure, contributing to the robustness of our supply chain and the expansion of our markets;
- All **stakeholders involved in our value chain**, including institutions, associations and academics.

We believe in a **shared, sustainable growth model**, where **each partner plays a key role** in the continuous improvement of our industrial, environmental and social practices.

Our commitment to sustainable development

Our sustainable development policy, **B.R.O.N.Z.E**, is based on **six strategic pillars**, which guide our internal actions as well as our expectations of our Partners:

- 1 **Build together**: our employees are regularly made aware of the importance of our sustainable development policy and the key role played by our partners in the success of our ambitions.
- 2 **Responsible purchase**: we buy our products and services according to sustainable development criteria: environmental, social and economic.
- 3 **Optimized performance**: we continuously improve our processes to reduce our environmental footprint and increase our efficiency.
- 4 **Net zero carbon footprint**: we are implementing initiatives to minimize our emissions across scopes 1, 2 and 3.
- 5 **Zero accident**: we aim to ensure safe and healthy working conditions for all our employees and Partners.
- 6 **Eco-Solution**: we work closely with our Partners to develop innovative, sustainable solutions that promote the circular economy.

As a signatory to the **United Nations Global Compact** and the **Charter on Partner Relations and Responsible Purchasing**, we are committed to promoting these principles within our ecosystem.

Scope and objectives of the Partner Code of Conduct

This Partner Code of Conduct defines our expectations in terms of Corporate Social Responsibility (CSR) with regard to all our Partners, and aims to:

- Establish a relationship of trust based on shared values;
- Encourage ethical and responsible practices throughout the value chain;
- Promote innovative solutions to environmental and social challenges;
- Support a collaborative approach to continuously improve our CSR commitments.

Our Partners play a key role in reducing our environmental impact. Given that our inputs make up a significant proportion of our carbon footprint, we have set an ambitious target: to **reduce our indirect greenhouse gas emissions by 25% in absolute terms by 2030, in line with the Science Based Target (SBTi) initiative** aimed at limiting global warming to 1.5°C.

We expect our Partners to:

- Be committed to reducing their own carbon footprint;
- Collaborate with us to identify and implement continuous improvement actions;
- Comply with the highest social, environmental, and ethical standards;
- Share best practices and innovate alongside Lebronze alloys to build a more sustainable future.

Compliance with the principles set out in this Code is an essential criterion in the selection, maintenance and development of our business relationships.

Alexandra Dumont Nubery,
General Manager



Respect for human rights and working conditions

Lebronze alloys and its partners are committed to the principles of the **United Nations Global Compact**, promoting fundamental rights, ethical working conditions and equal opportunities. We reject all forms of forced or child labor and actively combat discrimination, thus guaranteeing a responsible and sustainable value chain.

1 / RESPECT FOR HUMAN RIGHTS

The Lebronze alloys Group has adopted a Code of Ethics and Conduct for its employees and staff (hereinafter referred to as "Employees"), and requires the same commitment from its Partners in terms of respect for human rights (as described in the Universal Declaration of Human Rights), and respect for labor law (as described in the applicable Labor Code and in the fundamental conventions of the International Labor Organization).

2 / PROHIBITION OF CHILD LABOR

Partners must ensure that they do not use child labor. The term "children" refers to any person under the legal minimum age for admission to employment in the country where the work is performed, or the minimum age for admission to employment as defined by the International Labor Organization, whichever is higher.

3 / PROHIBITION OF FORCED LABOR

Partners must prevent involvement in all forms of modern slavery, including human trafficking and forced, bonded or indentured labor.

Partners shall not require Employees to pay fees, recruitment costs or deposits, directly or indirectly, as a condition of working. These practices are contrary to ethical principles and international labor standards.

4 / COMPLIANCE WITH REGULATIONS CONCERNING WORKING HOURS AND REMUNERATION

Partners shall provide all Employees with a written employment contract in a language they understand, clearly indicating their rights and responsibilities with respect to wages, working hours, benefits and other working and employment conditions.

Partners must comply with all applicable laws and regulations concerning working hours and rest days, and must guarantee all their Employees an appropriate and regular salary that complies with all applicable regulations.

5 / PROHIBITION OF HARASSMENT AND DISCRIMINATION

The Lebronze alloys Group expects its partners to treat their employees with dignity and respect.

Partners must ensure that their Employees benefit from a working environment free from bullying and/or sexual harassment, intimidation or other abusive behavior.

Partners shall provide equal employment opportunities to Employees and applicants for employment, without discrimination, and shall comply with all laws and regulations relating to non-discrimination.

No form of discrimination may be practiced, whether on the grounds of origin, sex, morals, sexual orientation, gender identity, age, marital status or pregnancy, membership or non-membership, real or assumed, of an ethnic group or nation, trade union or mutualist activities, religious convictions, physical appearance, state of health, loss of autonomy or disability, etc., or for any other reason.

6 / SOCIAL DIALOGUE AND FREEDOM OF ASSOCIATION

Partners shall respect the right of Employees to associate freely and to communicate openly with management regarding working conditions without fear of harassment, intimidation, sanction, interference or reprisal.

Partners shall recognize and respect any right of Employees to exercise rights of free association, including the right to join or not to join any association of their choice within the appropriate national legal framework.

7 / COMPLIANCE WITH APPLICABLE HEALTH AND SAFETY STANDARDS

Lebronze alloys expects its Partners to comply with the various health and safety standards and regulations. More specifically, they must provide their employees with a working environment that complies with these health and safety standards, and provide them with the material resources and training they need to contribute to their safety.

Lebronze alloys recommends implementing a health and safety management system (e.g. ISO 45001 or equivalent) including policies to protect the health, safety and well-being of people likely to be affected by their activities.

Finally, Partners must report any accidents or unsafe situations that may occur or may be detected in the course of their business relationship with Lebronze alloys.

Taking into account the environmental impact of activities

In line with the principles of the United Nations Global Compact, the Lebronze alloys Group expects its partners to take a responsible approach to environmental issues.

This involves risk management, concrete initiatives to limit ecological impact and the development of sustainable, innovative solutions.

1 / ENVIRONMENTAL RISK MANAGEMENT

The Lebronze alloys Group requires its Partners to conduct their activities in such a way as to anticipate and actively manage environmental risks throughout their operations, products and value chain. Lebronze alloys recommends implementing an environmental management system (e.g. ISO 14001 or equivalent).

Lebronze alloys has set itself a target of reducing its CO₂ emissions by 50% between 2018 and 2030 for Scopes 1 and 2, and by 25% between 2021 and 2030 for Scope 3. These 2 targets were validated by the Science Based Target Initiative in 2024.

Lebronze alloys therefore asks its Partners to support it in this approach by communicating the necessary data in a transparent way, by proposing innovative solutions, and by using low-carbon products or services or those with an optimized life cycle.

2 / CLIMATE IMPACT, LOW-CARBON TRAJECTORY

The Lebronze alloys Group is asking all its Partners to continuously minimize their greenhouse gas emissions in line with the Paris Climate Agreement, which aims to limit global warming to 1.5 degrees and achieve a carbon-neutral world by 2050.

3 / ENERGY OPTIMIZATION

The Lebronze alloys Group expects its Partners to implement actions aimed at improving their own energy efficiency, as well as offering Lebronze alloys the most energy-efficient solutions. Lebronze alloys recommends implementing an energy management system (e.g. ISO 50001 or equivalent).

4 / OPTIMIZING NATURAL RESOURCES AND BIODIVERSITY

The Lebronze alloys Group expects its Partners to optimize and limit the use of natural resources. In particular, Partners must protect natural ecosystems and put an end to any deterioration of these ecosystems. This means implementing responsible environmental management practices.

5 / LIMITING EMISSIONS AND WASTE

The Lebronze alloys Group expects its Partners to control the emissions and discharges associated with their activities.

Lebronze alloys encourages approaches aimed at limiting waste production, particularly hazardous waste, and implementing all forms of reuse and recycling.

6 / RECYCLED MATERIAL PURCHASING STRATEGY

An important objective of responsible purchasing is to increase purchases of recycled metals as an alternative to new metals, reaching 85% by 2030.

The Lebronze alloys Group encourages its Partners to develop offers to meet this need.

7 / RESPECT FOR LOCAL COMMUNITIES

Partners involved in operations in areas inhabited by ethnic minorities or indigenous populations are asked to respect the rights of local communities, through initiatives and ongoing dialogue.

Product regulatory requirements taken into account

1 / PRODUCT REGULATIONS

The Lebronze alloys Group expects its partners to comply with all applicable regulations, the specific requirements of which are detailed in its General Conditions of Purchase (GCP) and Sale (GCS).

These documents specify obligations in terms of product safety, market access and control of the toxicological impact of the substances used. By adhering to this Code of Conduct, Partners undertake to respect these rules and apply them rigorously and responsibly.

2 / TRACEABILITY OF PRODUCTS AND THEIR ORIGIN

The Lebronze alloys Group requires its partners to guarantee the legal origin and traceability of the materials and products they supply, particularly raw materials. Specific requirements in this area are detailed in our General Conditions of Purchase (GCP) and Sale (GCS).

Lebronze alloys refuses to buy products made wholly or partly from minerals or materials from conflict zones or countries subject to sanctions. Similarly, no sourcing will be carried out from high-risk jurisdictions identified by the FATF or from countries and territories uncooperative for tax purposes according to the European Union. By adhering to this Code of Conduct, partners acknowledge these commitments and undertake to comply strictly with them.

Ethical business practice

In line with the principles of the United Nations Global Compact, the Lebronze alloys Group expects its partners to act with integrity and transparency, fighting corruption in all its forms, including blackmail, extortion and bribery.

They must take care to prevent any practices that run counter to the laws in force, and adopt appropriate measures to ensure ethical trade. Specific requirements in this area are set out in the General Conditions of Purchase (GCP) and Sale (GCS), to which this Code of Conduct refers.

1 / FIGHTING CORRUPTION

The Lebronze alloys Group condemns all forms of corruption, whether involving its Employees or Partners, in accordance with the Sapin 2 Law in force in France and any regulations applicable in the countries where it operates.

Maintaining business relations with our Partners is strictly conditional on their commitment to prevent and reject any form of corruption, money laundering or any other violation of applicable laws. Failure to comply with these rules may result in termination of the contractual relationship or other appropriate sanctions.

When it comes to gifts and invitations, transparency is essential in all circumstances. Any gift or invitation received or offered in a professional context must be reported to line management and submitted for authorization, in accordance with the conditions defined in the Lebronze alloys Compliance Policy.

2 / COMBATING CONFLICTS OF INTEREST

The Lebronze alloys Group strictly prohibits any conflict of interest involving its Employees or Partners.

A conflict of interest arises when a person or entity has personal, professional or financial interests that are likely to impair his or her objectivity, impartiality or judgment in the exercise of his or her duties or responsibilities. This may include, for example, maintaining a personal or financial relationship with a supplier, customer or competitor, or accepting undue advantages that influence a business decision.

Any Employee or Partner concerned must report any conflict of interest to the Group.

3 / COMPLIANCE WITH COMPETITION RULES

The Lebronze alloys Group undertakes to comply with competition regulations, in particular by prohibiting any agreement, concerted practice or abuse of a dominant position in the market concerned. It demands the same commitment from its Partners. In order to guarantee fair competition, Lebronze alloys implements procedures to ensure equal treatment between its Partners. Purchasing decisions are based on an objective and comparative evaluation, taking into account the integrity and reliability of Partners, as well as criteria such as price, quality, performance, services, CSR commitments, delivery times and the suitability of the services offered.

4 / COMPLIANCE WITH INTERNATIONAL EXPORT CONTROL REGULATIONS

The Lebronze alloys Group expects its Partners to comply strictly with national and international regulations governing the export of goods and data.

As such, they must ensure compliance with all restrictions applicable to the cross-border circulation of sensitive products, technologies or information.

This applies in particular to regulations concerning export licenses, embargoes and economic sanctions. Partners' obligations in this respect are set out in Lebronze alloys' General Conditions of Sale (GCS) and General Conditions of Purchase (GCP), to which they must fully adhere.

5 / PROTECTION OF SENSITIVE INFORMATION: INTELLECTUAL PROPERTY, TRADE SECRETS AND PERSONAL DATA

The Lebronze alloys Group makes it a priority to protect intellectual property, business secrets, the confidentiality of personal data and the preservation of its assets.

As such, all information communicated by its Partners will be treated as strictly confidential and will only be used for authorized purposes. In return, Lebronze alloys expects its Partners to implement the same precautions and protective measures to ensure the security of data and information exchanged.

Partners' commitments to confidentiality and data protection are defined in Lebronze alloys' General Conditions of Sale (GCS) and General Conditions of Purchase (GCP), with which they are required to comply.

6 / TRANSPARENCY AND PUBLICATION OF NON-FINANCIAL INFORMATION

The Lebronze alloys Group is subject to legal and contractual obligations in terms of transparency and the publication of non-financial information.

As such, Lebronze alloys expects its Partners to respect these requirements in their contractual relations with the Group, as well as in their interactions with their own contacts. This includes the obligation to provide reliable and accurate information on their commitments to corporate social responsibility (CSR), ethics and compliance. In particular, Lebronze alloys attaches great importance to the fight against fraud, money laundering and the financing of terrorism. The Group expects its Partners to implement appropriate control and vigilance procedures to prevent and detect any fraudulent behavior or suspicious transactions. They are also asked to comply scrupulously with current anti-corruption and anti-money laundering regulations, and to cooperate fully with Lebronze alloys in implementing these commitments.

3 / PARTNER SUPPORT

The Lebronze alloys Group is convinced of the benefits of these commitments for improving its performance and that of its Partners, but recognizes that some of them will still need to make further efforts to comply fully with the principles and values set out in this document. Lebronze alloys encourages and supports a progressive and continuous approach towards these objectives.

As part of this dynamic, Lebronze alloys is committed, to the best of its ability, to supporting its Partners in their progress, by encouraging the sharing of best practices and supporting their efforts towards continuous improvement.

4 / ALERT PROCEDURE

The Lebronze alloys Group asks its Partners to inform it without delay of any situation that may contravene a law, regulation or one of the principles set out in this Code of Conduct.

This includes any fact or behavior that may be linked to corruption, influence peddling or any other unethical or illegal practice.

Alerts should be addressed to the Lebronze alloys Compliance Manager by one of the following means:

- e-mail: alerteinterne@lebronze-alloys.com
- via the dedicated platform: <https://lebronzealloys.integrityline.com/>

All reports will be treated with the strictest confidentiality and in compliance with current regulations. Whistle-blowers are protected against any form of reprisal, in accordance with applicable legal provisions.

5 / PENALTIES FOR NON-COMPLIANCE WITH THE CODE OF CONDUCT

In the event of proven non-compliance with the principles set out in this Code of Conduct, Lebronze alloys reserves the right to suspend or terminate all commercial relations with the Partner, without the latter being entitled to claim any compensation.

Control, reporting and sanctioning measures

1 / AUDIT

Lebronze alloys reserves the right to audit its Partners, either directly or through appointed auditors, in order to ensure compliance with the principles and rules set out above.

The Partners undertake to cooperate fully and to provide, in good faith, all the information and documents required to carry out these audits.

2 / CERTIFICATIONS

The Lebronze alloys Group requires its Partners to have the following certifications and/or to take active steps to obtain them:

- Environmental and management certifications: ISO 14001 (environmental management), ISO 45001 (occupational health and safety), ISO 50001 (energy management), or any other equivalent certification.

- CSR labels: assessment and recognition of corporate social responsibility (CSR) performance via labels such as EcoVadis, B Corp, or any other equivalent certification.
- Commitments and policies: implementation and application of structured Sustainable Development and Quality-Safety-Environment (QSE) policies, as well as the adoption of a Code of Ethics and/or a Code of Conduct aligned with the principles of corporate social responsibility.
- Partners are invited to demonstrate their commitment by adopting concrete, measurable actions, thereby contributing to responsible, sustainable development.

Partner Commitment

This Partner Code of Conduct forms an integral part of any contract between Lebronze alloys and its Partners. Lebronze alloys expects its Partners to apply the principles and values described in this Code of Conduct throughout their value chain.

By signing this Partner Code of Conduct, the Partner acknowledges that they have read and accepted the principles set out herein.

Company name of the Partner	Name and position of authorized signatory	Date	Signature



lebronze alloys

Exceptional metallurgy

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