



lebronze alloys

2025

Code of Ethics & Conduct



MANAGEMENT'S COMMITMENT	4
INTRODUCTION: OBJECTIVE AND SCOPE APPLICATION OF THE CODE	5
LBA UNDERTAKES TO COMPLY WITH NATIONAL AND INTERNATIONAL LAWS AND STANDARDS AND TO RESPECT HUMAN RIGHTS	6
LBA IS COMMITTED TO ITS EMPLOYEES	6
1 Developing talent and skills	6
2 Respect for working conditions and equal treatment	6
3 Respect for freedom of association, the right to organise and the right to collective bargaining	7
4 Maintaining the physical and mental well-being of employees through a safe and healthy environment	7
5 Protection of personal data	7
6 Support for community initiatives.....	7
LBA IS COMMITTED TO BUSINESS ETHICS AND PRACTISES ZERO TOLERANCE OF ALL FORMS OF CORRUPTION	8
1 Gifts and invitations.....	8
2 Financing of political parties.....	8
3 Lobbying.....	8
4 Conflict of interest management	8
5 Combating money laundering and the financing of terrorism	8
6 Additional commitments relating to export control.....	9
LBA IS COMMITTED TO BUILDING RELATIONSHIPS OF TRUST WITH ITS STAKEHOLDERS	9
1 Respect for the rules of trade and fair competition	9
2 Customer relations.....	9
3 Relations with suppliers and subcontractors.....	10
4 Relations with commercial intermediaries.....	10
5 Dealing with requests for external communications.....	10
LBA IS COMMITTED TO RESPECTING AND PROTECTING THE ENVIRONMENT	10
1 Protecting the environment and natural resources.....	10
2 Climate commitment	10
LBA IS COMMITTED TO ENHANCING THE VALUE OF THE GROUP'S ASSETS	11
1 Respect for confidentiality.....	11
2 Accuracy of management documents	11
3 Asset protection.....	11
IMPLEMENTATION OF THE ETHICS CHARTER	11
1 Penalties.....	11
2 Alert for breach of the Code of Ethics and Conduct	11

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INTERNAL ALERT SYSTEM	12
SCOPE OF APPLICATION	13
1 Reason for reporting.....	13
2 Whistleblower.....	13
3 Scope of consolidation	13
4 Conditions for reporting.....	14
PROTECTIONS PROVIDED BY LAW	14
PERSONS IN CHARGE OF COLLECTING AND PROCESSING ALERTS	15
1 Alert Officers	15
2 Investigation unit.....	15
3 Conflicts of interest.....	15
COLLECTION OF REPORTS	15
1 Issuing the report	15
2 Disclosures	16
3 Anonymous report (or not)	16
4 Confidential reporting	16
PROCESSING OF A REPORT	16
1 Receipt of the report by the alert officers.....	16
2 Admissibility analysis and internal investigation.....	16
3 Follow-up to the report.....	17
4 Closure of the report	17
DISSEMINATION OF THE INTERNAL ALERT SYSTEM AND CONTROLS	18
APPENDIX 1: DEDICATED PLATFORM OF THE INTERNAL WHISTLEBLOWING SYSTEM	19
APPENDIX 2: EXTERNAL ALERTS	23
APPENDIX 3: DATA PROTECTION	24
1 Purpose of data processing.....	24
2 Data processed.....	24
3 Data subjects	24
4 Recipients of data	25
5 Data retention period.....	25
6 The rights of customers over their data	25

Management's commitment

Lebronze alloys SAS (LBA) is a world leader in the processing and recycling of high-performance copper- and nickel-based alloys.

"Consolidate and expand expertise in the production and recycling of mainly copper- and nickel-based alloys for a responsible approach to meeting the technical and environmental challenges faced by user industries."

At LBA, responsible approach means implementing a "B.R.O.N.Z.E" sustainable development policy, which sets out the Sustainable Development Goals (SDGs) that we have set ourselves as part of our membership of the United Nations Global Compact, as 6 principles.

The Group's sustainable growth is based on the commitment of all our employees and on the trust of our partners. We must therefore constantly earn that trust by implementing the best ethical and behavioural practices set out in this Code of Conduct, the principles of which should guide you in your day-to-day actions.

The entire Executive Committee is committed to working alongside me to ensure the strictest compliance with this Code of Ethics and Conduct, and zero tolerance will be applied, particularly in the event of corruption.

I am counting on each and every one of you to promote it and to act in all circumstances in accordance with its instructions.

Alexandra Dumont Nubery,
Managing Director LBA SAS




THE EXECUTIVE COMMITTEE

Marie de Saint Salvy	Didier Pitot	Alban Didier	Stéphane Godonaise	Hacen Hadjarbi	Cyrille Heibst	Julien Furstoss	Valérie Creste	Laurent Massip
CEO	Director of Strategy and Development	Chief Financial Officer	Bars & Design BU Director	Rolled Products & Arcap® BU Director	Rods & Wire BU Director	Strategic Sales & Accounts Director / LBA NA President	Director of Human Resources	Head of Legal Affairs
Signé par : Marie de Saint Salvy 5FB3C09784E147C...	Signé par : Didier Pitot 807E99B0CFEC47A...	Signé par : Alban Didier F977C23434014F9...	Signé par : Stéphane Godonaise 7895706F271C4D2...	Signé par : Hacen Hadjarbi 8CC8533B051D458...	Signé par : Cyrille Heibst A549EBC17E3A485...	DocuSigned by : Julien Furstoss CFB9382243534D5...	Signé par : Valérie Creste 5893FC020E0147F...	DocuSigned by : Laurent Massip 9945EBB8A8584E0...

Introduction: objective and scope of application of the code

The objective of the Group's **"Code of Ethics and Conduct"** is to set out the principles and commitments that guide LBA's actions in its internal and external relations.

The Code also sets out expectations for employees in their day-to-day decision-making and in their relationships with all stakeholders by ensuring that they comply at all times with the 10 principles of the United Nations Global Compact, to which Lebronze alloys SAS has been a signatory since 2017.

- 1 Support and respect the protection of internationally proclaimed human rights.
- 2 Make sure no-one is complicit in human rights abuses.
- 3 Respect freedom of association and recognise the right to collective bargaining.
- 4 Contribute to the elimination of all forms of forced or compulsory labour.
- 5 Contribute to the effective abolition of child labour.
- 6 Contribute to the elimination of all discrimination in respect of employment and occupation.
- 7 Apply the precautionary approach to environmental challenges.
- 8 Undertake initiatives to promote greater environmental responsibility.
- 9 Encourage the development and diffusion of environmentally-friendly technologies.
- 10 Work against corruption in all its forms, including extortion and bribery.

The **"Code of Ethics and Conduct"** is therefore the reference document intended for each of the employees – hereinafter referred to as the "Employees". Every employee must comply with the provisions of this document, a copy of which is issued to all new employees when they sign their employment contract.

Moreover, a specific **"Supplier Code of Conduct"** is also available on our website, but we encourage all players in the Group's value chain to strengthen their commitments in terms of sustainable development.

Attached is a reminder of the Alert procedure available in the event of a breach of this Code of Ethics and Conduct, which is also available on our website.



LBA undertakes to comply with national and international laws and standards and to respect human rights

Our Group's reputation for integrity is built on respect for the laws, regulations and other obligations in force, wherever our Group operates.

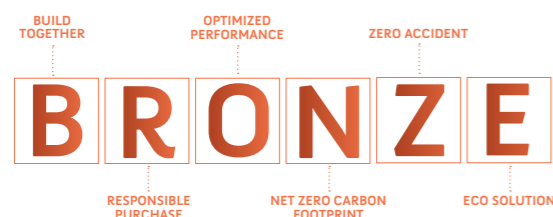
LBA undertakes to respect international standards in the field of Human Rights and in particular:

- The principles of the Universal Declaration of Human Rights
- The principles of the European Convention on Human Rights
- The principles of the International Labour Organisation (ILO)
- The OECD Guidelines for Multinational Enterprises

In accordance with principles 4 and 5 of the Global Compact, **LBA strongly condemns and prohibits** its subsidiaries, suppliers and service providers from engaging in any form whatsoever of:

- **Forced labour**, i.e. any work performed against one's will and under threat of coercion – use of violence or intimidation, debt manipulation, withholding of wages or identity.
- **Undeclared labour**, the act of not officially declaring a person working for a company to the competent authorities.
- **Child labour**. In compliance with the provisions of the International Labour Organisation (ILO), LBA refrains from using child labour, either directly or indirectly.

LBA is committed to its employees



"Build Together" is the first of the 6 principles of the Group's "B.R.O.N.Z.E" sustainable development policy, which reaffirms the Group's commitment to the following 6 principles of social responsibility.

1 / DEVELOPING TALENT AND SKILLS

Managers have a key role to play in driving the organisation forward, empowering their teams and promoting a culture of integrity. We encourage listening and initiative at all levels.

LBA is responsible for developing the technical and managerial skills of all employees at all levels. We therefore offer our employees a wide range of training programmes (both internal and external) to ensure their employability and their ability to progress within the Group.

2 / RESPECT FOR WORKING CONDITIONS AND EQUAL TREATMENT

The relationship between LBA, its employees and its partners is based on mutual respect, trust and individual dignity.

In line with this commitment, **we strictly prohibit discrimination** of any kind, including on the basis of age, nationality, religion, sexual orientation, marital, parental and family status, ethnicity, disability and political or trade union affiliation.

The Group is particularly committed to promoting diversity in the workplace, professional equality between men and women and the professional integration of young people.

LBA also **ensures compliance with regulations on working hours, pay and social benefits** in the countries where the Group operates. In addition to its legal obligations, the company seeks to share value through impact initiatives such as the introduction of employee share ownership in France.

3 / RESPECT FOR FREEDOM OF ASSOCIATION, THE RIGHT TO ORGANISE AND THE RIGHT TO COLLECTIVE BARGAINING

At all sites, the Group is committed to forging transparent and constructive links with employees and their union representatives to facilitate collective bargaining. To achieve this, we respect employees' rights to form or join trade unions and to sign collective agreements. We reject any threat of intimidation or reprisals and protect employees against acts of union discrimination.

LBA undertakes to prohibit any act of interference in trade unions, but will provide representatives with the information they need to negotiate constructively in good faith.

We also respect **employees' individual and collective freedom of expression** in accordance with applicable laws and regulations. We respect their ability to make an informed decision, free from coercion, as provided for by law.

In the event of a breach of this code, management undertakes to respect the right of employees to lodge complaints without suffering as a result.

4 / MAINTAINING THE PHYSICAL AND MENTAL INTEGRITY OF EMPLOYEES THROUGH A SAFE AND HEALTHY ENVIRONMENT

Safety is one of the principles of the Group's CSR policy, which is reflected in its "**Zero Accident**" policy. Each employee must set an example by adopting exemplary behaviour in terms of health and safety. **Any breach of health and safety rules in the workplace will be penalised.**

All new employees are trained in safety and the Group's internal practices. We encourage further training throughout employees' careers, and LBA is committed to **risk prevention** through awareness-raising and investment to continually improve working conditions.

Moral or sexual harassment or any form of harassment is strictly prohibited and the Group is committed to combating it.

Awareness training is provided to employees **and we encourage them to report any situation, whether you are a victim or a witness**, which threatens the integrity of an employee, via the alert system.

5 / PROTECTION OF PERSONAL DATA

LBA puts in place systems ensuring the confidentiality and secure processing of the personal data used by the company. "Personal data" means any information relating to an identified or identifiable natural person. Our Group is committed to complying with applicable laws on the **protection of employees' personal data**, particularly in the context of the application of European Regulation 2016/679 of 27 April 2016 ("GDPR").

Lebronze alloys undertakes to collect and use personal data in a lawful, legitimate and ethical manner and to always respect the privacy of its employees and third parties with whom the Group comes into contact.

An IT charter is available and specifies all the best practices to be implemented on a daily basis. It is given to each new employee and must be respected.

6 / SUPPORT FOR COMMUNITY INITIATIVES

As a player rooted in our territories, **LBA is committed to supporting appropriate charitable actions** (donations to local associations, funding of positive-impact events, patronage, etc.) to contribute to the deployment of local actions and encourage employees to carry out voluntary work.

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

Given our exceptional expertise, we believe we have a duty to pass on our metalworking know-how to the next generation. We are therefore **committed to education**, working with secondary schools and colleges located near our sites to promote this heritage and contribute to the education of future generations.

Finally, Lebronze Alloys applies human rights principles in the communities in which we operate and we ask the entire Group value chain to respect these principles.

LBA is committed to business ethics and practises zero tolerance of all forms of corruption

The Group combats corruption in all its forms, active or passive, direct or indirect, of private or public persons. All employees shall refrain from promising, offering, soliciting or accepting, directly or indirectly, an advantage in any form whatsoever that is contrary to the laws or regulations in force in order to obtain, retain, award or renew a contract or to obtain a personal advantage.

For offences that can be accompanied by heavy fines and imprisonment, zero tolerance will be applied.

Lebronze alloys, whose parent company is established in France, is subject to the provisions of the French "Sapin 2" Act of 9 December 2016. This code of ethics and conduct constitutes its anti-corruption code of conduct within the meaning of article 17, II, 1 of this law.

The instructions to be followed are as follows:

1 / GIFTS AND INVITATIONS

The acceptance or occasional offer of gifts or invitations of modest value is a legitimate business practice that must comply with the laws and customs of each country.

All employees must refrain from offering or accepting any gift or invitation, in whatever form, which:

- Could influence a decision or be perceived as influencing a decision by donors or beneficiaries;
- Would be made in violation of laws, regulations or instructions in force within our Group;
- Would have a value greater than the equivalent of 100 euros per year and per business partner, whatever the form (sums of money, material goods, services, travel).

2 / POLITICAL PARTY FINANCING

The payment of funds and/or the provision of services on behalf of our Group to a political party or organisation and to political figures is prohibited.

3 / LOBBYING

Lebronze alloys participates transparently in debates on the development of public policy or in legislative processes concerning its field of activity.

Under no circumstances may these actions lead to an offer or promise of a benefit in kind or in cash to a third party. All lobbying requires the authorisation of Group Management.

4 / MANAGING CONFLICTS OF INTEREST

The company must avoid any situation where the personal interests of an employee, or those of natural persons or legal entities to which he or she is linked, are likely to conflict with the interests of our Group. To determine whether a conflict of interest exists, each employee must therefore ensure that he or she is acting in the best interests of LBA, to the exclusion of any other consideration, in particular personal considerations.

The following situations may be considered likely to give rise to such conflicts of interest:

- Any direct or indirect interest in a competitor, supplier, service provider or customer (current or potential), except in the case of the purchase of listed securities in compliance with insider information rules;
- Any professional or personal commitment outside the company that could affect the commitment to the service of our Group, except with the prior authorisation of line management.

Any potential conflict of interest must be reported to line management.

5 / COMBATING MONEY LAUNDERING AND THE FINANCING OF TERRORISM

Money laundering involves concealing the origin of funds obtained illegally (corruption, trafficking, tax fraud, etc.) so that they appear to have come from legitimate sources.

The financing of terrorism is a criminal offence characterised by the provision or collection of funds likely to be used to commit a terrorist act.

The Group asks its employees to prohibit or report to the Legal Department any of the following situations:

- Transactions in which the names and contact details of the parties are unknown,
- Transactions conducted by unknown or unnecessary intermediaries,
- Unnecessary or unexplained transactions,
- Unusual methods of payment,
- Financial flows that could have a criminal or unlawful origin or destination (list of non-cooperative countries in tax matters, subject to embargo, etc).

Before entering into a formal relationship with a third party, each employee must carry out checks to define the latter's corruption risk profile. In addition, it is necessary to ensure throughout the business relationship that the third party complies with its anti-corruption commitments.

6 / ADDITIONAL COMMITMENTS RELATING TO EXPORT CONTROL

LBA complies with all laws and regulations such as the US International Traffic in Arms Regulation, known as "ITAR", the US Export Administration Regulations, known as "EAR", and EU Regulation no. 2021/821 on dual-use goods.

As such, the company is particularly vigilant in complying with and applying:

- Trade sanctions against certain countries, organisations or persons (embargoes);
- Restrictions on the movement of certain products, services or information (documentary obligations relating to international trade, particularly in terms of end users);
- Controls relating to the export and re-export of controlled, military or dual-use goods (authorisations, national licences or "third party" in the case of ITARs).

To this end, all LBA interfaces (pre-sales, partnerships) and transactions are subject to the internal "compliance and export control" process.

LBA is committed to building relationships of trust with its stakeholders

The Group must make commitments to these third parties in order to establish a relationship of trust, but also expects them not to tolerate any form of corruption or influence peddling.

1 / RESPECT FOR THE RULES OF TRADE AND FAIR COMPETITION

The purpose of competition law is to ensure fair competition between companies on the market. Our Group is committed to scrupulously complying with the competition rules applicable in the various countries in which it operates. Accordingly, **each employee undertakes to refrain from participating in agreements with competitors** whose purpose or effect is to:

- Set prices and commercial terms;
- Allocate markets or customers, particularly in the context of calls for tender.

To this end, we ask employees to ensure that there are no exchanges of sensitive information with our

competitors and to ensure that information concerning competitors has been collected legally.

2 / CUSTOMER RELATIONS

Our Group is committed to meeting the needs of its customers and is committed to:

- Providing quality products and services and constantly improving its technologies and methods with a strong focus on innovation and safety;
- Offering lead-times that do not restrict access to markets;
- As soon as possible, developing partnerships with our customers to reduce environmental impact (eco-design, waste recycling, circular economy, etc.)

In addition, all employees involved in international business operations **comply with the laws and regulations governing restrictions on the export of products and services**. If necessary, employees can ask the Legal Department for support.

3 / RELATIONS WITH SUPPLIERS AND SUBCONTRACTORS

Our Group strives to develop relationships based on trust and partnership with its suppliers in order to best meet its customers' expectations.

Taking everyone's interests into account and respecting fair contractual terms form the basis of relations between our Group and its suppliers.

Through the "**Responsible Purchase**" principle, Lebronze alloys encourages its suppliers and subcontractors to adopt ethical principles and environmental responsibilities equivalent to its own and reserves the right to audit or have a third party audit their practices and to take the results of these audits into account in its decisions. A code of conduct setting out the Group's requirements of these suppliers is available on our website.

In addition, all employees must comply with the Group's purchasing procedures.

4 / RELATIONS WITH COMMERCIAL INTERMEDIARIES

Our Group uses commercial intermediaries (brokers, business introducers, sales agents, distributors, etc.). These relationships are governed by a contract.

The selection, anticipated services and remuneration of these intermediaries must be rigorously controlled by each employee concerned and comply with internal rules.

5 / DEALING WITH REQUESTS FOR EXTERNAL COMMUNICATIONS

Our Group has appointed people to be in charge of communications with the media, the financial community and regulatory bodies. Any request addressed to an employee (e.g. interviews, public speeches, position statements, etc.) must be forwarded to the persons designated by our Group for this purpose.

LBA is committed to respecting and protecting the environment

1 / PROTECTING THE ENVIRONMENT AND NATURAL RESOURCES

Our Group is a key player in the energy transition through its range of products and services. We also develop high-tech solutions designed to improve human health and ensure economic development that is compatible with environmental protection.

Lebronze alloys is fundamentally committed to **respecting and protecting the environment and biodiversity** in its industrial and logistical operations, in particular by:

- Optimum use of metals and components to limit the consumption of natural resources,
- Recovering offcuts and waste for reuse,
- Preventing pollution of any kind,
- Reducing water abstraction,
- Optimising the energy consumption of our processes and reducing carbon emissions,
- Using clean, safe technologies.

2 / CLIMATE COMMITMENT

As part of its low-carbon strategy, each year the Group carries out a full carbon assessment (scope 1, scope 2 and scope 3) and has made **commitments to reduce its carbon emissions in line with the recommendations of the Science Based Target agency**, which recommends the following targets to limit global warming to 1.5°C:

- 50% absolute reduction in Scope 1 and 2 emissions between 2018 and 2030;
- 25% absolute reduction in Scope 3 emissions between 2021 and 2030.

To help achieve these objectives, all Group employees are invited to take part in the actions implemented by LBA (awareness-raising, information, ISO 50001 certification, investment plan, etc.) and we particularly encourage initiative in these areas.

We also encourage all our stakeholders to commit to an SBTi-compatible low-carbon trajectory.

LBA is committed to enhancing the value of the Group's assets

1 / RESPECT FOR CONFIDENTIALITY

Confidential information is a valuable asset. This is a Group asset comprising:

- Intellectual property (manufacturing secrets, know-how, etc.),
- Internal financial, technical or commercially sensitive information,
- Information relating to personal data and human resources,
- Information on the use of tools or systems,
- Information entrusted to us by third parties under the seal of confidentiality.

Our Group is careful to protect its confidential data and that of third parties. We are all responsible for protecting confidential information. We must ensure that it is used appropriately and passed on only to other authorised persons, in order to avoid any accidental, unauthorised or unprotected disclosure.

We must take care to avoid any unauthorised disclosure to third parties, such as customers and other business partners, and in the course of our conversations and activities outside the workplace.

2 / ACCURACY OF MANAGEMENT DOCUMENTS

The reports and accounts of each entity in our Group faithfully reflect all the operations carried out by these entities (assets, liabilities, expenses, etc.). Each employee ensures that the information and reports communicated to each level of our Group accurately reflect all transactions in a timely manner.

3 / ASSET PROTECTION

All employees are responsible for protecting the Group's assets (both tangible and intangible) from damage, theft or misappropriation, and in particular for ensuring that they are not used for personal purposes.

Implementation of the ethics charter

SANCTIONS

Failure to comply with some of the rules listed above may constitute a criminal offence in countries where our Group operates. Employees who contravene the Group's Code of Ethics and Conduct may be liable to prosecution in the Courts. For its part, the Group will initiate the appropriate disciplinary procedures in the event of conduct in breach of this code, in compliance with the corporate legislation of each country.

ALERT FOR BREACH OF THE CODE OF ETHICS AND CONDUCT

Any employee who becomes aware of a breach of the rules defined in this Code must report it using the internal whistleblowing procedure, available from their Human Resources department and at the following URL link <https://lebronzealloys.integrityline.com/>. The whistleblowing procedure is recalled in the Appendix to this document.

This system has been designed as an additional tool for employee freedom of expression. No employee can be punished, dismissed or discriminated against for testifying in good faith.

By signing this Code of Ethics and Conduct, the Employee acknowledges that he/she has read and accepted the principles set out therein.

Employee's surname and first name	Date	Signature



Internal Alert System

The Lebronze alloys Group has adopted this **Internal Alert System** (hereinafter referred to as the "System"). Its purpose is to encourage and facilitate feedback in order to resolve situations that may be problematic and represent a risk for the Lebronze alloys Group, its employees or third parties.

The Whistleblowing System is based on the principles and obligations arising from the **Sapin 2 law**, which establishes a protective regime for whistleblowers. This protection was reinforced by the **"Waserman" law** of 21 March 2022.

The System does not replace the possibility offered by law to the whistleblower to refer the matter directly and at any time to the competent external authorities (list in Appendix 2).

The use of the System is a right for employees. Therefore, no employee may be subject to reprisals or disciplinary sanctions for reporting facts or testifying

in good faith under the whistleblowing System, even if the facts alleged in the report ultimately prove to be unfounded or inaccurate and do not give rise to any action.

On the other hand, misuse or bad faith in use of the System may expose its author to disciplinary sanctions as well as legal proceedings. Bad faith consists of using the System to report facts that the person knows to be false or to make defamatory allegations against a third party, with the intention of causing harm or in the hope of obtaining undue consideration.

The LBA internal whistleblowing System was the subject of information and consultation with the employee representative bodies, in accordance with the legal provisions.

Scope of application

1 / REASON FOR THE REPORT

The reported facts are facts that have occurred or are very likely to occur relating to:

- A crime or offence (e.g. corruption, influence peddling, bribery, illegal acquisition of interest, embezzlement of public funds, favouritism, sexual or moral harassment, etc.);
- A threat or harm to the general interest;
- A breach or attempted concealment of a breach of national, European or international laws and regulations (e.g. competition law, business secrecy, sanctions & embargoes, export control, personal data protection, etc.);
- Breaches or situations contrary to the Code of Ethics and Conduct and the Partner Code of Conduct;
- Risks of serious harm related to the Group's activities concerning human rights, fundamental freedoms, personal health and safety and the environment;
- Fraud in the financial, accounting, legal, production, purchasing/sales fields, etc.

The report may not relate to:

- Simple disagreements with a colleague or their line manager;
- Employee dissatisfaction with the assessment of their performance, career development, or level of remuneration;

- Procedures subject to a duty of secrecy are excluded from the System, such as national defence secrecy, medical secrecy, secrecy of legal deliberations, judicial investigation and prosecution, and lawyer-client professional secrecy.

2 / THE WHISTLEBLOWER

This whistleblowing System is open in particular to:

- Employees of the Lebronze alloys Group, regardless of their status;
- Former employees and job applicants;
- External or occasional employees (e.g. service providers, consultants, temporary workers, interns, etc.);
- Shareholders and partners, holders of voting rights at Shareholders' Meetings;
- Co-contractors of the Lebronze alloys Group (suppliers, customers and intermediaries) and their subcontractors (including employees and members of governance bodies);
- Members of the governance bodies of the Lebronze alloys Group.

3 / SCOPE OF CONSOLIDATION

The Lebronze alloys Group's internal alert System is applicable to all Group subsidiaries, regardless of the country of establishment.

4 / REPORTING CONDITIONS

In order to benefit from the protection conferred on a whistleblower, all of the following conditions must be met:

- **Be a natural person:** legal entities are not considered to be whistleblowers;
- **No obtaining of any direct financial consideration as a result of the report** (e.g. remuneration, bonus or increase in payments);
- **Be in good faith:** the author of the report must have reasonable grounds to believe that the facts reported

Protections provided by law

If the whistleblower meets all the conditions to be recognised as a whistleblower, he/she benefits from the following protections:

- The protective status of whistleblower is public policy, which means that it is not possible to waive it by any means whatsoever;
- **The confidentiality of the whistleblower's identity** must be ensured by the persons who collect and process the reports. Failure to comply with this obligation is punishable by criminal penalties (imprisonment and fine);
- **As an employee, the whistleblower cannot be sanctioned by his/her employer or subjected to retaliation measures as a result of his/her report.** The French Labour Code lists the measures prohibited against whistleblowers (e.g. disciplinary sanctions, transfer, negative performance review, etc.);
- In the event of negative measures taken against him/her, the whistleblower may refer the matter to the Industrial Tribunal for summary proceedings. He/she may also obtain compensation for his/her loss (e.g. loss of remuneration following the report).

In addition, the law provides:

- **No civil liability of the whistleblower** if his/her report appears necessary to protect the interests in question and complies with the rules provided for by the legal texts;
- **No criminal liability of the whistleblower** in the event of the offence of disclosing confidential information or a secret of which he or she has become aware in a lawful manner, for example, in the context of the position held.

are true, without knowingly making false accusations, maliciously or that mislead;

- **Report facts relating to the System** (as listed in 1/REASON FOR THE REPORT);
- **If the reported information was obtained outside the professional context, it is necessary to have personal knowledge of the facts.** Conversely, this condition relating to personal knowledge of the facts is not necessary to obtain the status of whistleblower when the information was obtained during a professional activity.

However, the disclosure of this information must be necessary and proportionate to safeguard the interests in question.

Finally, the whistleblower may benefit from:

- Financial support decided by the court hearing the case (court costs or subsidies if its financial situation has deteriorated) during legal proceedings;
- Measures promoting their professional reintegration;
- Psychological and financial support measures by the competent external authority.

Protection is extended to the entourage of whistleblowers:

- **"Facilitators"**, i.e. natural persons who may risk retaliation measures (e.g. a colleague, relative, etc.) or non-profit private legal entities (association, trade union, non-governmental organisation) that support the whistleblower;
- **Persons linked to the whistleblower** (e.g. partners, employer's subcontractor, lawyers, consultants) and the legal entity linked to the whistleblower (e.g. a company controlled by him/her or for which he/she works).

Persons in charge of collecting and processing alerts

The Lebronze alloys Group System is based on an organisation with identified players, detailed below. These persons, in a limited number, are chosen on the basis of their respective skills, which are necessary to process the reports.

1 / ALERT OFFICERS

Alert officers are employees who **receive the report** either via the dedicated secure platform (Appendix 1), or via the email address alerte@lebronze-alloys.com, or from the whistleblower's line manager or human resources manager.

The Lebronze Alloys Group's alert officers are:

- Head of Legal Affairs
- Compliance Officer

2 / INVESTIGATION UNIT

The Investigation Unit is made up of employees who will **process the alert** by conducting investigations aimed at establishing the veracity of the facts.

The Investigation Unit is composed of the following members:

- Head of Legal Affairs,
- Compliance Officer,
- Managing Director,
- Director of Human Resources,
- Managing Director of the relevant subsidiary, if applicable.

Members of the investigation unit may not be relieved of their duties or penalised by their employer for the performance of their duties under this whistleblowing System.

3 / CONFLICTS OF INTEREST

In all cases, the Alert Officers and the members of the Investigation Unit undertake not to act in the event of a conflict of interest.

This obligation consists of declaring the conflict of interest in question to the other Alert Officers in writing, and withdrawing from the case, before any participation in the processing of the alert, or failing that, when the conflict of interest arises during the investigation.

If the Alert Officer is himself/herself in a conflict of interest situation, he/she will be excluded from the Investigation Unit for the processing of the report, which is the source of the conflict.

Collection of reports

Knowledge of the Lebronze alloys Group whistleblowing System by employees and external stakeholders is essential for its effectiveness. All staff are informed of the existence of the System and of this procedure by any means (display of information on site, email, website/intranet, Internal Regulations, Code of Conduct).

1 / REPORT ISSUING

The confidentiality of reports and the protection of their author are fundamental concerns for the Lebronze alloys Group.

This is why reports can be collected and processed thanks to a dedicated secure platform that offers an encrypted exchange space, disconnected from the company's information systems and so does not allow

the traceability of IP addresses. The data is hosted on a server external to the company. Only authorised persons, the Alert Officers, may access the reports.

This external platform is:

- Available at all times;
- Available in French and English;
- Accessible from any device connected to the Internet (computer, tablet, smartphone);
- Accessible using the URL address <https://lebronzealloys.integrityline.com/>

However, it is always possible to issue an alert via another reporting channel, using the email address alerte@lebronze-alloys.com, or by informing the line manager, the human resources manager, the staff representatives or the compliance manager.

Nevertheless, the Lebronze alloys Group favours the use of the dedicated platform which ensures the confidentiality and security of communications, the traceability of alert management and the protection of the whistleblower.

2 / INFORMATION TO BE PROVIDED

Whistleblowers are invited to provide the most factual, precise and exhaustive information possible in direct connection with the subject-matter of the report, including:

- The entity of the Lebronze alloys Group to which they belong;
- The persons involved;
- The place and date or period relating to the reported events;
- A description of the facts and context.

This information must be supported by evidence, if possible in writing.

3 / ANONYMOUS REPORT (OR NOT)

The declarant also has the choice of declaring his/her identity or remaining anonymous but he/she may only remain anonymous by using the dedicated secure platform.

In the event of anonymity, whistleblowers' attention is drawn to the fact that:

- Anonymous reporting is examined with precaution, to avoid the risk of malicious reporting;
- Investigations may be more time-consuming;
- It is then impossible to ensure their protection as a whistleblower since their identity is not known.

Processing a report

1 / RECEIPT OF THE REPORT BY THE ALERT OFFICERS

The report made via the Whistleblowing System is sent without delay to the Alert Officers, who have a period of **7 business days** from its receipt to notify the author of the acknowledgement of receipt of the report.

At any time during the processing of the report, the whistleblower may waive anonymity.

If the report was made anonymously and its author has not indicated an email address to receive the notifications, he/she must connect spontaneously and regularly to the platform to view his/her messages and respond to requests for additional information.

4 / CONFIDENTIAL REPORT

The Internal Whistleblowing System guarantees strict confidentiality of the identity of the whistleblower at all stages of the processing of the report:

- A limited number of persons authorised to collect and process reports are subject to a specific confidentiality obligation;
- Where applicable, the experts appointed as part of the investigations contractually undertake to ensure the confidentiality of the data related to the report and to delete it at the end of their assignment;
- Information likely to identify the whistleblower is never disclosed to the persons concerned by the report: alleged perpetrator(s) of the reported facts, victim(s) or witness(es).

The secure platform reinforces these confidentiality guarantees. The content of the report made online on the platform is encrypted end-to-end:

- All exchanges are carried out on a secure messaging system hosted on the alert platform and remain confidential;
- When a report is made anonymously, the platform guarantees that exchanges will continue, also anonymously via a dialogue box.

2 / ADMISSIBILITY ANALYSIS AND INTERNAL INVESTIGATION

Reports are subject to an admissibility analysis to determine whether they fall within the scope of the internal whistleblowing System and comply with the conditions laid down by law.

This analysis, which may require some preliminary investigations, is carried out by the Investigation Unit. During this phase, additional information or clarifications may be requested by exchanges on the dedicated secure platform, by email, or on the secure messaging system.

In this case, the whistleblower will receive an email notification inviting him/her to connect to the platform. If he/she has not activated the notifications, he/she must regularly connect to the platform.

The conclusions of the analysis of the admissibility of the report must be sent to the whistleblower, within a maximum period of 3 months from the acknowledgement of receipt of the report:

- **If the report is not admissible**, a message informs the whistleblower of the closure of his/her report and the reasons for this. The author may, where applicable, consult a competent authority in order to make an external report (list in Appendix 2);
 - **If the report is admissible**, the investigation unit checks the accuracy of all the information provided and carries out an internal investigation to determine the reality and materiality of the reported facts.
- As part of this investigation, it will be possible to:
- Request additional information from the author;
 - Appoint a service provider with specific expertise;
 - Involve other employees of the Lebronze alloys Group based on their expertise.

In the event of an anonymous report, the Alert Officers ensure that the processing of this report is conducted with special precautions, particularly at the time of its prior examination of admissibility, by ensuring that the reported facts are sufficiently credible, serious and detailed.

Anonymous reports considered admissible will be treated in the same way as others, provided that their author responds to requests for additional information during investigations within a reasonable time frame. If the report does not contain sufficiently detailed information to carry out investigations to establish the accuracy of the facts, it will be closed without further action.

3 / FOLLOW-UP GIVEN TO THE REPORT

Without ever disclosing the identity of the whistleblower, the person being reported is informed, by the Alert Officers, in writing, from the moment the report was deemed admissible by the Investigation Unit of:

- The existence of an investigation and its characteristics,
- Alleged facts in order to be able to exercise his/her rights to a defence,
- Procedures for exercising their rights, particularly those relating to their personal data.

At the end of the internal investigation, the investigation unit decides on the action to be taken:

- **No further action** if the facts are not proven, the investigation does not establish the veracity of the alleged facts or the evidence collected is insufficient: the report is inadmissible, or the report is inaccurate or insufficient, without, however, the bad faith of the whistleblower being established.
- **Reporting with follow-up** if the facts are proven. If the investigation carried out makes it possible to establish the materiality of the breaches and the liability of their alleged perpetrators, closure of the alert procedure with disciplinary sanctions and/or legal proceedings against the accused person(s).
- **Misuse of the System**, if the admissibility analysis or the investigation that follows demonstrate the whistleblower's bad faith, closure of the procedure with possible disciplinary sanctions (in the case of an employee) and/or legal proceedings against him/her, the whistleblower no longer benefiting from the protection related to his/her status as a whistleblower.

4 / CLOSURE OF THE REPORT

The whistleblower is systematically informed in writing of the closure of his/her report and of the decision taken at the end of the examination of the file, regardless of the outcome.

The person concerned will be informed by any appropriate means by the Alert Officers of the follow-up given to the report.

If an employee is implicated at the end of the investigations, the Human Resources Department informs them in accordance with the existing procedure and in particular by complying with the internal regulations.

Personal data are stored and then anonymised or deleted in accordance with the personal data protection policy detailed below.

Dissemination of the internal alert system and controls

All Group personnel are regularly informed of the existence and operation of the whistleblowing System and referred to the procedure.

Line managers are made aware of how to direct an employee who would like to make a report.

Reminders are regularly sent via the Group's communication channels, by any means (display of information on site, email, website/intranet, internal regulations, Code of Ethics and Conduct).

The link to the whistleblowing platform and useful information on the whistleblowing System are also available on the LBA website as an appendix to the Code of Ethics and Conduct. This access is open to LBA employees but also to third parties.

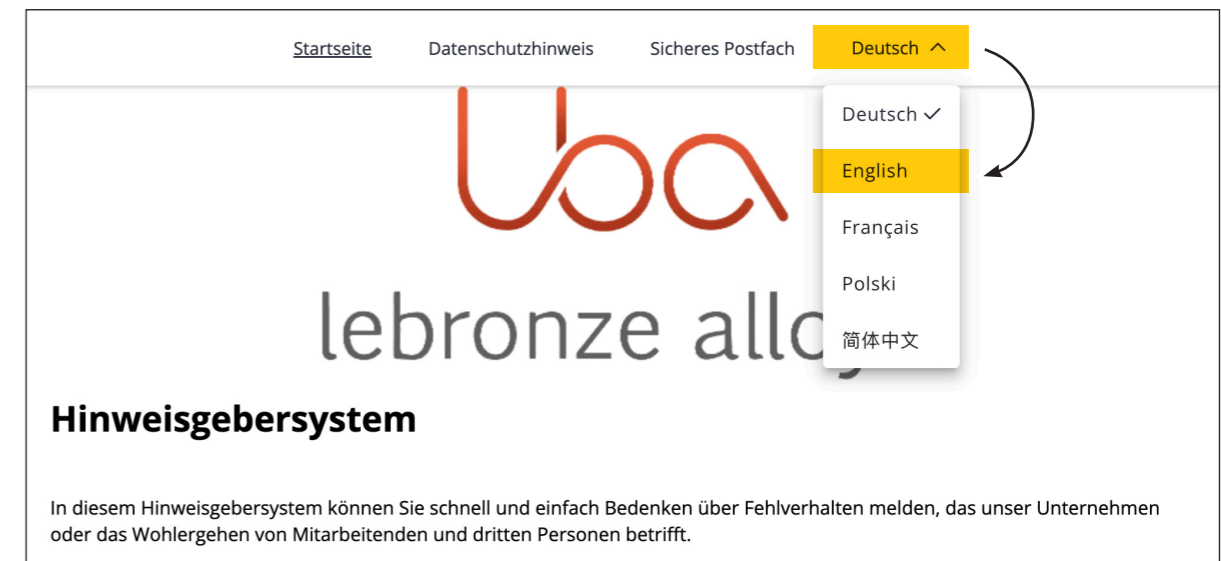
In the event of doubt, any person to whom this procedure is addressed may at any time contact the LBA Compliance Officer regarding the issue of a report or any question about the procedure. They may also send an email to the address alerte@lebronze-alloys.com accessible only to Alert Officers.

Appendix 1: Dedicated platform of the Internal Whistleblowing System

The dedicated secure platform link is <https://lebronzealloys.integrityline.com/>

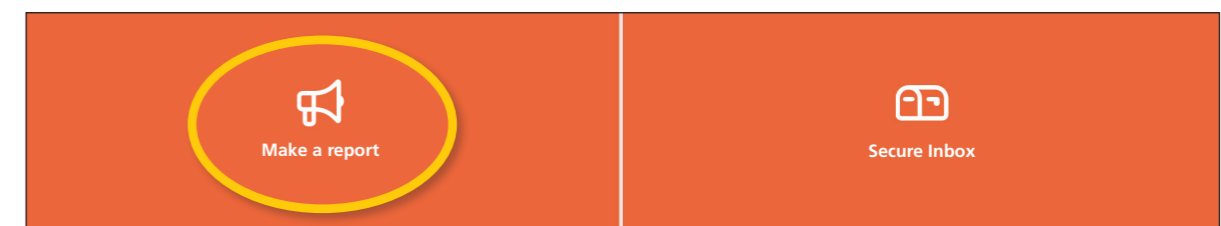
1ST STEP: CONNECTION

After clicking on the link, if the text is not in French, click on the language name at the top left and select English.

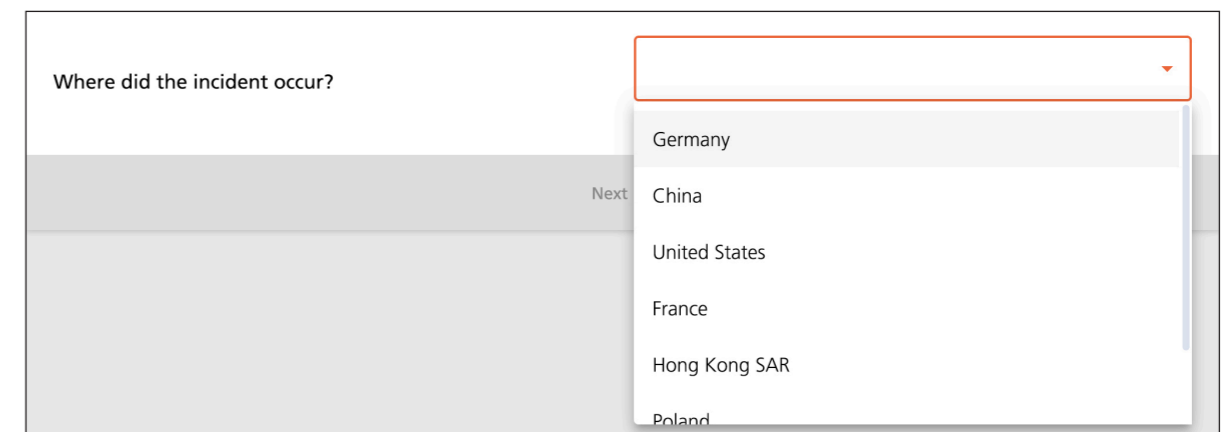


2ND STEP: ISSUE THE REPORT

To issue the report, then click on "Make a report" in the orange rectangle on the left.



The first question asks you to select the country where the incident occurred.



You will then need to complete the form below. Only 2 pieces of information are mandatory: the place of the incident and the facts. However, the more detailed your report is, the more easily admissible it will be.

You also have the option to:

- By clicking on the microphone on the left, make a report orally by recording your alert;
- Add attachments and photos by clicking on the paper clip on the left.

Make a report

Where did the incident occur? France

Required

What is your suspicion?

0 / 50000

Required

In which company did the incident take place?

Please give the name of the affected department:

Do you work in the organisation?

Who is involved in the incident?

3RD STEP: CONTACT INFORMATION

You must then enter your contact details UNLESS you decide to remain anonymous. By clicking on the "remain anonymous" box, the boxes below concerning your identity disappear.

Contact Information

You can choose to submit the report anonymously, but we encourage you to provide your name and contact details in the fields below.

Stay anonymous

Name

Required

Phone number

Required. Only numbers and the following characters are valid: + ()

Email

Required. Please enter a valid email address

4TH STEP: CREATION OF THE SECURE INBOX

You must then create the secure inbox that will allow exchanges between the alert officers and yourself to complete the information previously entered.

You must enter a password, perform a security validation by copying the list of characters indicated, then click on the "I have read and understood the Privacy Policy" box and finally click on "Send" at the bottom of the page.

Secure Inbox

Please open a Secure Inbox by creating your own password, even if you have already provided your contact details. This allows us to communicate with you easily while ensuring the security and confidentiality of the information transmitted.

After submitting the report, you will receive a randomly generated case file number. Please write it down with your password. You must use both to log into your Secure Inbox.

Use your secure inbox if you want to send more case information or see case information from us. If you wish, all communications with us remain anonymous.

Once your report has been analysed by the alert officer, you will find a response accessible from your Secure Inbox. If you have entered an email address in the form, you will be automatically notified by the system when a new message is available. If you chose anonymous reporting, please log in regularly to see if you have received a message.

Enter your password

Required

Required

Security validation

Required

I have read and understood the Privacy Policy.

[More information](#)

Next

5TH STEP: RETRIEVING THE CASE NUMBER

Once you have clicked on "Next", a confirmation message will appear indicating the case number. **It is very important to keep this number** because it then allows you to log in to the Secure inbox.

Confirmation

Thank you. We have received your alert. We will start processing the case as soon as possible.

Once your report has been analysed by the alert officer, you will find a response accessible from your Secure Inbox. If you have entered an email address in the form, you will be automatically notified by the system when a new message is available. If you chose anonymous reporting, please log in regularly to see if you have received a message.

Your case number: **XP7K-CE831732** Copy Code !

Please note the following case ID as it is evidence that you sent this alert and that it has been received. You can use it, along with your password, to log in at any time. You can view our comments and, if you wish, enter another protected dialogue. Thank you.

6TH STEP: CONNECTION TO THE SECURE INBOX


Once your report has been sent, the LBA investigation unit will have to analyse the admissibility of your report, and will certainly need to send you requests for additional information.

2 cases:

- You submitted your report without being anonymous.
If a message is sent to the secure inbox, you will then receive an email to the email address entered when the secure inbox was created.
- You have submitted your report anonymously.

You will therefore need to log in regularly to the secure inbox to view messages. To connect to the secure inbox, click on the orange rectangle on the right, then enter, as requested in the "case ID" box, the number of your case and the password you have created.

Reports relating to potential misconduct in member states of the European Union or identified by whistleblowers within the European Union can also be reported to external authorities. You can find an overview [here](#).


 Make a report


Case access

When you create an Secure Inbox, you will be given a Case ID, and you will choose a password. You can use the Case ID and password to log in to the Inbox in order to see if you have received any questions. All communication with us is anonymous if you wish it to be. If you forget one of your credentials (Case ID or password), you will need to submit a new report. For security reasons and protection of your anonymity, we cannot recover them.

Case ID


Password


Cancel
Login


 Secure Inbox

7TH STEP: CORRESPONDENCE SECURE INBOX

When you reach the Secure Inbox, you can see the messages exchanged. To reply, you can enter the text in the specific field, or save a voicemail by clicking on the microphone and upload attachments by clicking on the paper clip.

Secure Inbox Log out 

Correspondence	Case	Case ID
<div style="background-color: #f1f3f4; padding: 5px; border: 1px solid #ccc;"> <div style="display: flex; align-items: center;">  By the administrator </div> <div style="border: 1px solid #ccc; padding: 5px; margin-top: 5px;"> <p>X correctly received, we will process the admissibility of your report as soon as possible. In the meantime, please connect to the platform regularly because I will almost certainly need to ask you for more information, thank you</p> <p style="font-size: 0.8em; margin-top: 5px;">24 Feb. 2025, 16:34</p> </div> </div>		
<div style="border: 1px solid #ccc; padding: 5px; margin-top: 10px;"> <div style="display: flex; align-items: center;">   <div style="flex-grow: 1; border: 1px solid #ccc; height: 20px; margin-left: 5px;"></div> </div> </div>		

Appendix 2: External alerts

Appendix to Decree No. 2022-1284 of 3 October 2022 on the procedures for collecting and processing reports issued by whistleblowers and establishing the list of external authorities established by Law No. 2022-401 of 21 March 2022 aimed at improving the protection of whistleblowers:

- The full list of external authority bodies can be found in the document below, page 7 to page 9.

<https://www.legifrance.gouv.fr/download/pdf?id=q48CGV-CdqrWolbE71wPQfxnFFJbCxjZfqxFzwqAFRg=>

Annexe 3: Data Protection


PRIVACY POLICY: INTERNAL ALERTS

The personal data of Employees/Interns are processed by Lebronze alloys in accordance with EU Regulation no. 2016/679 of 27 April 2016 on the protection of personal data ("GDPR"), and Law no. 78-17 of 6 January 1978 "French Data Protection Act", as amended, under the conditions defined below:

1 / PURPOSE OF THE DATA PROCESSING

1.1. Data Controller

Lebronze alloys ("LBA"),
SAS with capital of €12,508,759.45,
Registered office: Voie de Châlons, RD 977,
51600 Suippes, France
Châlons-en-Champagne Trade and Companies Register
no. 572 196 129
Represented by ALLOYS TOPCO,
chaired by Marie de Saint Salvy,


Lebronze alloys, Service RGPD
35, rue de Rome, 75008 Paris

rgpd@lebronze-alloys.com

1.2. Purposes of processing

- Collect and process reports;
- Carry out the necessary checks, investigations and analyses;
- Determine the follow-up to be given to the report;
- Ensure the protection of data subjects, and in particular ensure the confidentiality of the identity of the whistleblower and of subsequent exchanges with the whistleblower, as well as of the facts reported and the persons concerned;
- Exercise or defend legal claims.

1.3. Legal basis for processing

- Compliance with legal obligations to which LBA is subject, in particular the Sapin 2 law (Article 6(1)(c) of the GDPR).

2 / DATA PROCESSED

2.1. Categories of data processed

- Surname, first name, position and contact details of the issuer and/or the person(s) the subject of the alert;
- Surname, first name, position and contact details of the person(s) in charge of collecting and/or processing the report;
- Reported facts;
- Information collected as part of the checks;
- Reports on checks carried out;
- Follow-up given.

2.2. Data Source

- Data Subject(s).

2.3. Mandatory nature of data collection

Collection is mandatory. Without communication of this data, the data subject will not be able to make an internal alert (except an anonymous whistleblower).

2.4. Automated decision making

The processing does not provide for automated decision-making.

3 / DATA SUBJECTS

- Whistleblower;
- Persons implicated in the report;
- Person(s) in charge of collecting and/or processing the report.

4 / RECIPIENTS OF THE DATA

4.1. Categories of recipients

- Persons in charge of collecting and managing reports within LBA (Alert Officers and Investigation Unit);
- Service provider(s) to which LBA may outsource the management of certain activities;
- Experts appointed for the purposes of the investigation;
- Judicial authorities, where applicable.

4.2. Data transfers outside the EU

No transfer of data outside the European Union, unless the alert is issued by one of LBA's foreign subsidiaries, or a third party contracting outside the EU.

5 / DATA RETENTION PERIOD

- If the report is inadmissible: 2 months from the date of closure of the investigation procedure;
- If the report is admissible and classified for no further action: 12 months from the decision;
- If the report is admissible and results in follow-up: Until the end of the proceedings or the time barring of appeals against the decision.

6 / CUSTOMERS' RIGHTS OVER THEIR DATA

6.1. Information on the rights of the data subject

The data subject has the possibility to exercise the following rights:

- Right of access;
- Right to rectification;
- Right of erasure;
- Right to restriction of processing;
- Right to object to processing;
- Right to withdraw consent at any time;
- Right to portability.

6.2. Procedures for exercising their rights

The data subject may exercise his/her rights, in writing, at the following contact details:


Lebronze alloys, Service RGPD
35, rue de Rome, 75008 Paris

contactrgpd@lebronze-alloys.com

6.3. Complaint to the CNIL

If the data subject considers, after contacting LBA's GDPR Department, that his/her rights to his/her personal data are not respected, he/she may send a complaint to the CNIL at the following link: <https://www.cnil.fr/fr/webform/adresser-une-plainte>



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