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SAINT JEAN INDUSTRIES GROUP ETHICAL CHARTER

INTRODUCTION

The *Saint Jean Industries* group is built on a history of several decades, closely linked to the ruling and founding family. The women and men who have invested themselves contribute to sustainable growth. They molded and forged the human values of the group:

Involvement, humility, team spirit, creativity and passion


General mission of the *Saint Jean Industries* group :

"Work for a cleaner world by reducing the use of natural resources with less capital, energy and time."

CHAPTER 1 – Respect for fundamental rights

In all the group's subsidiaries, value creation is generated by the development of human capital. Therefore, the protection of this human capital is one of the fundamentals of the group's policy. In addition to prioritizing the safety of our staff, we apply the principles of fundamental rights in our HR processes and in daily life in our company and with our partners:

- No children will be asked for work in our company as well as without partners. No individual will be subjected to forced labor in our company or in our partners.
- No discrimination of any kind, for the hiring and development of our staff as well as our partners, will be tolerated. Respect for the human person must never be affected by actions or decisions within the framework of our company.

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- Any person who has information relating to situations which do not comply with the above principles must inform the employer without delay and without fear: through his hierarchy and/or the human resources organisation and/or employee representatives (staff delegates, trade unions, members of the CHSCT).
- The staff hired by our company and our partners must be managed in accordance with the labor laws of the countries in which they work.

CHAPTER 2 – Anti-corruption practice – code of conduct


Definition of the different types of behavior to be avoided because they are likely to characterize acts of corruption or influence peddling:

- Actions of "**influence peddling**" may be committed either by a private or public person who avails himself of real or supposed influence and solicits or accepts gifts, offers or promises, in order to obtain from a public authority or administration advantages or favors of any kind (C. Pen., art 433-2)
- '**Bribery**' operations are characterized by the attempt to obtain, for any advantage, a person in charge of a function, that he performs or refrains from performing an act of his office".

Therefore, it is forbidden to seek a gift or hobby offered by someone with whom the company has a business relationship, for yourself or a member of your family, and to accept any gift or hobby that could influence, or give the impression of influencing the decisions of society.

Gifts sent directly to the company must be informed to the manager of the person concerned in order to distribute them fairly and/or share.

RECIPROCALLY, our staff shall not engage in influence peddling and corrupt operations in any way. Internal audits carried out by the finance department will make it possible to check the absence of such actions. On the other hand, inviting customers to business meals or events (trade shows as part of a commercial approach) are tolerated if and only if, they are the subject of information to the general management.

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CHAPTER 3 – Environmental Protection

All our production sites comply with the ISO 14001 environmental standard.

CHAPTER 4 – Protection of whistleblowers

Definition: " a **whistleblower** is a natural person who disinterestedly and in good faith reveals or reports a crime, misdemeanour, threat or serious harm to the public interest; of which she had personal knowledge."

What the law says; Article L. 122-9:

"A person who infringes a secret protected by law is not criminally liable, provided that such disclosure is necessary and proportionate to safeguard the interests in question, that it takes place in compliance with the reporting principles defined by law and that the person meets the criteria for defining a whistleblower provided for in Article 6 of Law No. 2016-1691 of 9 December 2016 ..."

Reporting an alert: 3 reporting channels

1. Direct or indirect supervisor
2. The employer: general management or human resources directorate
3. Employee representative bodies


Whistleblower protection:

Saint Jean Industries is committed to ensuring that employees can report any breach of this ethical charter without fear and in complete confidentiality.

What the law against reprisals says (Article L.1132-3-3 of the Labour Code):

"No employee may be sanctioned, dismissed or subject to a discriminatory measure, direct or indirect, in particular with regard to remuneration within the meaning of Article L.3221-3, profit-sharing measures or distribution of shares, training, reclassification, assignment, qualification, classification, professional promotion, transfer or renewal of contract for having reported an alert in compliance with Articles 6 to 8 of Law No. 2016-1691 of 9 December 2016 on transparency, the fight against corruption and the modernisation of economic life".

"Any person who obstructs, in any way whatsoever, the transmission of a report to the persons and bodies mentioned in the first two paragraphs of I of Article 8 is punishable by **one year's imprisonment and a fine of €15,000**".

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Olivier BETOU
Group Human Resources Director