



GROUP ETHICAL CHARTER

SAINT JEAN INDUSTRIES

INTRODUCTION

The *Saint Jean Industries Group* has been built over decades of history, deeply connected to the founding family. The dedicated women and men who have invested their efforts drive sustainable growth. They have shaped and defined the group's core values:

Dedication, humility, teamwork, creativity, and passion

Saint Jean Industries Group Mission Statement :

"Working toward a cleaner world by reducing the use of natural resources—
with less capital, less energy, and less time ."

CHAPTER 1 – Respect for Fundamental Rights

Across all of our group's subsidiaries, value is created through the growth and development of our people. That's why safeguarding our human capital is a core principle of our company policy. Beyond making employee safety our top priority, we embed fundamental rights into all our HR processes and in our daily work life, both within our company and with our partners:

- No child will ever be asked to work for our company or our partners. No individual will be subjected to forced labor in our company or with our partners.
- We do not tolerate any form of discrimination in hiring or career development, either within our company or among our partners. Respect for human dignity is never to be compromised by any actions or decisions in the course of our business.



- If you have information about any situations that do not align with the principles mentioned above, you must promptly and confidently report it to your employer: either through your management chain, the human resources department, or employee representatives (such as staff delegates, labor unions, or members of the Health, Safety, and Working Conditions Committee).
- All employees hired by our company or our partners must be managed in accordance with the labor laws of the countries in which they work.

CHAPTER 2 – Anti-Corruption Practices – Code of Conduct

Definition of behaviors that must be avoided because they may qualify as acts of corruption or influence peddling:

- Acts of **“influence peddling”** can be committed by a private or public individual who claims to have, or is believed to have, influence and who seeks or accepts gifts, offers, or promises to secure benefits or favors of any kind from a public authority or administration (C. Pén., art 433-2)
- Instances of **“corruption”** involve attempting to obtain from someone in a position of responsibility, by offering any kind of advantage, a particular action—or inaction—related to their duties.

Therefore, it is strictly forbidden to seek or accept any gift or entertainment from anyone with whom the company has business relations, whether for yourself or a family member, if it could influence or appear to influence the company’s decisions..

If gifts are sent directly to the company, the manager of the recipient must be notified so that the items can be fairly distributed and/or shared.

Likewise, our staff must never engage in influence peddling or corrupt practices in any form. Internal audits by the finance department will be conducted to ensure such behavior does not occur. However, inviting clients to business meals or industry events (such as trade shows for commercial purposes) is permitted only if upper management is informed.



CHAPTER 3 – Environmental Protection

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

CHAPTER 4 – Whistleblower Protection

Definition: “A **whistleblower** is an individual who, acting selflessly and in good faith, reports or discloses a crime, offense, threat, or serious harm to the public interest that they have personally become aware of.”

Legal framework; Article L. 122-9:

“A person who discloses information protected by law is not criminally liable if sharing that information is necessary and proportionate to protect the interests at stake, provided they follow the reporting procedures set out by law and meet the definition of a whistleblower as outlined in Article 6 of Law No. 2016-1691 of December 9, 2016 (...)”

How to report a concern: There are three channels for reporting (if the concern involves a manager, you may go directly to level 2 or 3)

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

Whistleblower Protection:

Saint Jean Industries is committed to ensuring that employees can report any violations of this Code of Ethics without fear and in complete confidentiality.

What the law says about protection from retaliation (Article L.1132-3-3 of the Labor Code):

"No employee may be punished, terminated, or subjected to any form of discrimination, whether direct or indirect. This includes pay according to Article L.3221-3, bonuses or stock distribution, training, reassignment, placement, qualification, grading, promotion, transfer, or contract renewal, simply for reporting an alert in line with Articles 6 to 8 of Law No. 2016-1691 of December 9, 2016 regarding transparency, anti-corruption, and the modernization of economic life."

"Anyone who, in any way, hinders the transmission of a report to the individuals and organizations referenced in the first two paragraphs of Article 8, Section I, faces **one year in prison and a €15,000 fine.**"

Olivier BETOU
Group Human Resources Director