

Ethics & Compliance Charter





Foreword by **Jorge Boucas**

We are committed to our sustained growth, the success of the Centre Mondial de l'Innovation Roullier and our solid international development.

We are proud of our "Ethics & Compliance" Programme, at the core of which lie the principles of Respect, Responsibility and Integrity.

These three principles guide the Group's commercial activities on a daily basis as well as the behaviour of each and every one of us, regardless of our position or the entity to which we belong.

These three principles ensure the longevity of the foundations of sustainable and secure growth.

They also guarantee the confidence that we grant and inspire.

■ ■ *As a fundamental stakeholder in our market areas, it is our duty to promote exemplary practices.* **■ ■**

Jorge Boucas
Chairman of the Board – Groupe Roullier

Our governing principles

Safety and sustainability of the Group require that its decisions and professional practices be guided by intangible principles:

Respect, Responsibility and Integrity.

These principles constitute the very foundation of the Groupe Roullier Ethics and Compliance policy.

Respect

The Groupe Roullier has a firm commitment to respect fundamental human rights and, above all, mutual respect between employees. We are convinced that our development can only be sustainable if the rights of each and every individual are respected and if we ensure the application of this principle on a daily basis as part of our professional practices and act with respect, courtesy and consideration towards our clients, potential clients, suppliers and subcontractors.



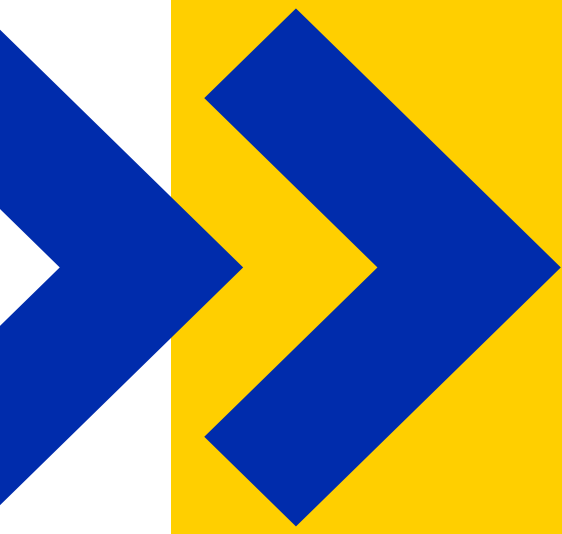
Responsibility

The Groupe Roullier ensures that in all circumstances it acts in compliance with current standards and regulations. We are fully aware of the impact of our activities and adopt a voluntary and responsible approach to the safety of all our stakeholders. Groupe Roullier is also committed to environmental protection through programmes to minimise the environmental impact of our activities, products and transportation methods.



Integrity

We act with integrity and ethics, and in compliance with current legislation and regulations. Our employees guarantee this principle in all relations with our counterparties and ensure that we maintain a standard of integrity and objectivity in the choice of our working partners. We work in compliance with internationally recognised accounting and tax standards and have prioritised the prevention and detection of all forms of fraud and corruption.



Our commitments

Respect of people's rights

People are at the core of the development of the Groupe Roullier. Respecting standards pertaining to the rights of individuals and labour law in each country where we are present is a priority.

Combatting fraud, corruption and "unlawful facilitation payments"

It is essential that stakeholders in the economic sector integrate the negative impact that fraud and corruption can have in the business sector.

It is for this very reason that the Groupe Roullier applies a zero-tolerance policy in terms of fraud, corruption or "facilitation" payments, notably where representatives of public authorities are involved.

Respect of embargos and other international restrictions

The Group respects national and international regulations which govern international trade, and which may lead to embargos or trade restrictions.

The Groupe Roullier has implemented a control and approval procedure for transactions with countries and people concerned by sanctions.

Respect of the Health and Safety of people and the Environment

As with any human activity, industrial and commercial activities also have an impact in terms of risks to people and the environment.

Respect of privacy and personal data

The privacy of employees and potential candidates, clients and suppliers must always be respected.

The Groupe Roullier undertakes to ensure that personal data is collected and processed in a fair and lawful manner, for a declared purpose and in a manner proportionate to the objective pursued. The Groupe Roullier ensures that each individual benefits from a prior right of consent to collection and access to his/her personal data, and that storage of this data is controlled by reliable safety systems.

Fair competition

The Groupe Roullier condemns any agreement or practice which is anti-competitive on the market and ensures that its employees respect current laws on competition.

Compliance of raw materials and our products

In all our commercial activities, we are governed by strict regulations which lay down many criteria for quality, traceability and safety of raw materials which we handle and for the products we sell onto the market.

As a major stakeholder, over and above compliance of these already stringent rules, we have introduced our own Quality Standards for Raw Materials. The solid position of the Groupe Roullier depends on the quality of its products. We have made this a priority on a daily basis.

Prevention of conflicts of interest

Our entrepreneurial mindset and our effective performance lead us to constantly take decisions which commit the Group.

However, we act on merit and not in terms of personal interest. Any relationship or personal interest likely to directly or indirectly prevent any employee from taking a fair and impartial decision constitutes a conflict of interest. Such situations must be avoided as they may lead to divergence from principles of Integrity and Responsibility.



Our resources

The groupe roullier ethics and the compliance of its operations with its commitments are guaranteed on a daily basis by the existence of tools and procedures accessible by all employees.

Common standards accessible to all employees

The Groupe Roullier applies the principles of action and the commitments of its "Ethics & Compliance" Programme to all of its activities, regardless of their location. Consequently, the Group ensures that its employees effectively have access to the Group's

Ethics & Compliance Programme composed of our Ethics & Compliance Code, policies and processes, are sufficiently informed and, if they assume managerial or particularly sensitive positions, that they undergo dedicated training.

A vigilant ethics & compliance committee

As guarantor of our programme, the Group Ethics & Compliance Committee comprises directors from major core areas of the Group. The Committee develops and promotes a frame of reference in terms of Ethics & Compliance,

is responsible for the training policy of our employees, continuously evaluates and improves our Ethics & Compliance Programme, deals with warnings and alerts, and where necessary, recommends the necessary remedial measures.

Ethics & compliance officers and a management team at each of our sites to respond to your needs

The Ethics & Compliance Committee is backed by local Officers who guarantee the implementation of procedures and who are in particular

responsible for clarifying the interpretation and implementation of the Group Ethics & Compliance Programme to all the employees.

An effective alert system which respects the rights of whistleblowers

The Groupe Roullier has a platform intended to receive alerts in the event of information relating to practices or situations likely to breach the commitments of our "Ethics & Compliance" Programme, and more broadly, any crime or threat or prejudice for the general interest. The Groupe Roullier ensures that whistleblowers

are guaranteed confidentiality and that their alerts are handled according to prevailing regulations. More information on the "Ethical line" page.



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