



Safic-Alcan Group Code of Conduct

2025

CONTENTS

MESSAGE FROM THE CEO p. 01

GLOSSARY p. 02

GROUP VALUES p. 04

CODE OF CONDUCT GUIDELINES p. 05

RESPECT LABOUR AND HUMAN RIGHTS p. 07

- Providing a healthy and safe environment
 - Combatting discrimination and preventing harassment
 - No forced and child labour
-

ENSURE BUSINESS ETHICS AND COMPLIANCE p. 09

- Conflicts of interest
 - Combatting corruption and influence peddling
 - Gift, entertainment and travel
 - Payments for products and services
 - Antitrust and competition laws
 - Sanctions, embargoes and export controls
-

ACT WITH RESPECT FOR THE ENVIRONMENT AND PRODUCT STEWARDSHIP p. 13

- Product stewardship
 - Environment
-

PROTECT FINANCIAL INTEGRITY AND ASSETS p. 15

- Fraud
 - Accurate Books and Records
 - Protection of information
-

SPEAK UP: REPORT CONCERNS! p. 18

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INNOVATIVE
SOLUTIONS

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Message from the CEO

Committed to the United Nations Global Compact (UNGC) and the Responsible Care Initiative, Safic-Alcan and its subsidiaries (“Safic-Alcan” or “Group” or the “Company”) have developed a growth strategy over the past several years using Sustainable Development as the engine for innovation.

Safic-Alcan operates across numerous countries, each with its own unique culture, legal framework, and political system. As a global business, we are committed—both on a corporate level and as individuals—to conducting all our activities in a manner that fosters sustainable and ethical business relationships. This commitment is grounded in full compliance with the laws of each country in which we operate, as well as the standards relevant to our industries.

To support this commitment, we have developed and regularly updated our Code of Conduct (the “Code”), which applies to all Group employees. It serves as a shared foundation that guides how we work together as a team and engage with our key stakeholders, reflecting our values and the Safic-Alcan approach to doing business.

This Code of Conduct and our internal group policies aim to build the foundation of our common culture and way of doing business, with a focus on preventing corruption, building trust and fostering long-term relationships. We collectively contribute to a culture of excellence and accountability, reinforcing our reputation as a trusted leader in the chemical distribution industry.

All members of our Group are expected to understand and follow the guidelines set out in this Code of Conduct.

The Executive Committee joins me in thanking you for your commitment to these principles and for helping us uphold the standards that define Safic-Alcan.

Yann LISSILLOUR, CEO of Safic-Alcan Group



Glossary

Conflict of Interest refers to a situation in which a person is in a position to derive personal benefit from actions or decisions made in their official capacity.

Corruption refers to offering, promising, giving, soliciting, or accepting, directly or indirectly, any undue advantage—financial or otherwise—to influence a decision, action, or omission for any public or private person/company. Corruption can be active (on the corrupter's part) or passive (on the part of the person being corrupted).

Discrimination refers to the unjust or prejudicial treatment of different categories of people, especially on the grounds of race, age, sex, or disability.

Diversity refers to the various characteristics that define employees, from ethnic, social or cultural origins, religious beliefs, age and gender to sexual orientation, level of education, disability, etc.

Equity refers to offering all employees the resources and opportunities they need to succeed, while taking individual differences into account. Unlike equality, which proposes the same treatment for all, equity adapts strategies to compensate for any disadvantages.

Facilitation payments involve paying money in order to facilitate or expedite an administrative process (e.g. permits), usually to a government official or employee, when such an action is not authorised under normal processes and rules. In many countries, this kind of activity is considered corruption.

Favouritism refers to the unfair or biased treatment of certain individuals or entities in business decisions, such as recruitment, promotions, supplier selection, or contract awards, based on personal relationships, friendships, or other undue influences rather than objective criteria. This practice undermines transparency, integrity, and fair competition, exposing the company to corruption risks.

Harassment refers to aggressive pressure or intimidation. It involves unwelcome conduct that can be based on various factors such as race, colour, religion, sex (including sexual orientation, gender identity, or pregnancy), national origin, age, disability.

Inclusion refers to creating a caring and secure environment where any individual or group can be and feel welcomed, respected, supported and valued.

Influence peddling refers to offering or receiving benefits in exchange for exploiting or offering to exploit one's real or supposed influence over a decision maker.

Integrity ('Probité' in French) refers to the commitment of organisations and individuals to act transparently, ethically, and in compliance with anti-corruption laws. It involves preventing and detecting corruption risks, promoting accountability, and ensuring that business decisions are fair and lawful rather than for personal gain or undue influence.

Money laundering refers to the process of making illegally obtained money appear legitimate by disguising its origins through complex financial transactions.

Stakeholder refers to a person or group of people who can affect or be affected by the company's achievement of its objectives. Stakeholders can have a direct or indirect relationship with the company. Stakeholders can be internal (directors, managers, employees, etc.) or external (shareholders, partners, customers, suppliers, competitors, and so on).

Undue advantage refers to any benefit, privilege, or favour—whether financial or otherwise—that is offered, promised, given, or received improperly, without legitimate justification, or in violation of laws, regulations, or ethical standards.

Examples include monetary benefits (e.g., bribes, kickbacks), gifts or hospitality exceeding reasonable limits, preferential treatment (e.g., hiring without merit), access to confidential information, or promises of future benefits such as contracts or promotions.

Whistleblower refers to a person who reports, in good faith and without direct financial compensation, information regarding a crime, threat, or harm to the public interest, or any violation of a national or international standard. Whistleblowers play a crucial role in helping maintain ethical standards within the organisation by reporting suspected misconduct, illegal activities, or any action that may harm the organisation's reputation, employees, or partners.

Group values

At Safic-Alcan, we are dedicated to being a leading partner in the specialty chemicals industry, providing innovative solutions. Committed to excellence, sustainability, and customer satisfaction, we serve as the durable link between all stakeholders.

Our core values guide our every action and define our identity as a company. Entrepreneurship, Responsibility, Expertise and Trust form the pillars of our relationships with our customers, partners and employees. We encourage innovation while ensuring that we act responsibly towards all our stakeholders.

Thanks to the commitment and skills of our teams, we offer cutting-edge solutions, while building relationships based on transparency and reliability. By upholding these values, we ensure a positive and lasting impact in everything we do.



Entrepreneurship is the heartbeat of our company. We celebrate the spirit of innovation, and our global success is rooted in the entrepreneurial mindset of our local leaders, driving us to constantly explore new horizons, focus on customer proximity, and adapt swiftly to the evolving needs of our dynamic industries.



We are driven by a deep sense of responsibility for our customers, suppliers, employees, and the overall environment around us. We care for the well-being of all stakeholders, ensuring their success and satisfaction through our commitment to exceptional service, responsible practices, sustainable approach to ingredient selection, and a genuine concern for the durable impact of our actions.



Our teams are comprised of highly skilled and technical people. Our commitment to expertise, and the innovation that comes with it, is a priority in the way we conduct business, enabling all the solutions we deliver. We continuously invest in the development and enhancement of our team's knowledge to provide cutting-edge services.

Our proficiency in industrial specialty chemicals sector, and our understanding of market trends ensure that our customers, suppliers, as well as all our stakeholders, benefit from the highest level of technical competence and industry insights.



Trust is the foundation of our relationships. We build and uphold trust with our customers, suppliers, and employees through transparency, integrity, and reliability. Our global success is a testament to the trust we've earned, and we recognise the importance of preserving our reputation by consistently delivering on our promises and maintaining the highest ethical standards.

Code of Conduct Guidelines

Governance

Safic-Alcan has established a Compliance Committee to assist all Group employees with understanding and meeting its legal, ethical and regulatory obligations.

Compliance is everyone's responsibility and to ensure that its principles are adopted as widely as possible, Safic-Alcan has implemented a governance structure. This includes:

- Safic-Alcan's CEO and Executive Committee ("ExCom"), who promote the Group's commitment to ethics and social and environmental responsibility within their respective domains
- The Compliance Committee, which includes representatives of the ExCom and of the financial control, legal, quality management, human resources and ESG departments. It monitors compliance with this Code
- The Managing Directors, who ensure that principles set out in this Code are properly applied by employees across all entities
- The Innovation and Sustainability Council, who coordinates the implementation of the Group's strategic ESG responsibility objectives

All managers are responsible for embodying the Code of Conduct's commitments and promoting them within their teams.

All employees must personally comply with these principles in all circumstances.

Resources

There are a number of resources available for all employees:

- Safic-Alcan's policies and procedures for referring concerns to the Compliance Committee are available on its intranet in the "My Safic Global - Compliance" section.
- Training is also available on its e-learning platform "Safic'Academy".
- Its commitment aligns with international industry standards. Please consult the following websites for more information:

[The United Nations Global Compact](#)

[OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#)

[The UN Guiding Principles on Business and Human Rights](#)

[The International Labour Organisation \(ILO\)](#)

[The Universal Declaration of Human Rights](#)

[The United Nations Declaration on the Rights of the Child](#)

[UN Declaration on the Rights of Indigenous Peoples](#)

[Convention on Biological Diversity and the Nagoya Protocol on Access and Benefit Sharing](#)

[Convention on International Trade in Endangered species of Wild Fauna and Flora](#)

Scope and applicability

This Code applies to all employees of the Group at all levels, including full-time, part-time, and temporary employees, in accordance with the applicable standards.

Local adaptation

As this document is applicable to the entire Group, it may be translated but not otherwise adapted.

Communication

This code is available on Safic-Alcan's website and in the "My Safic Global - Compliance" section of the Group's intranet and can be downloaded in several languages.

Making the right decision

No document can anticipate and address every situation that may arise. So, whenever you are faced with this type of decisions, ask yourself the following questions:

- Is it legal?
- Does it comply with our Code and other policies?
- Is it consistent with the company's core values, goals and interests?
- Would I be comfortable if my decision was made public internally or externally?

If the answer to any of these questions is no, or if you have any doubts, you must consult the appropriate contacts (the ExCom, your management, or the Compliance Committee at compliance.committee@safic-alcan.com or directly) to discuss the matter openly before acting.

Revisions

Safic-Alcan acknowledges that the Code of Conduct is not exhaustive, and its content may change periodically. Safic-Alcan reserves the right to change the Code at any time, with or without notice.

Version 1	August, 2018
Version 2	October, 2018
Version 3	May 2025



Respect Labour and Human Rights

Internal references:

- Group Human Resources Policy
- Third-Party Code of Conduct
- Safic-Alcan Conflict Minerals position

Safic-Alcan is dedicated to upholding labour and human rights by ensuring that non-discrimination and fair employment practices are upheld throughout the Group as well as by providing a safe and healthy workplace and complying with all relevant laws and standards.

Safic-Alcan continuously reviews and improves its policies to foster a respectful and inclusive environment and believe that all employees, customers, and suppliers must be treated with respect, dignity, honesty, fairness, and integrity.

Providing a healthy and safe environment

Safic-Alcan is committed to providing a safe working environment for all employees, contractors, and visitors working at its premises or visiting its facilities, with a target of zero incidents.

Everyone is responsible for prioritising health and safety by adhering to Company policies and procedures related to workplace health and safety, as well as to any applicable local laws and regulations that impose higher standards.

Combatting discrimination and preventing harassment

Safic-Alcan's diversity strategy aims not only to represent a wide range of backgrounds but also to actively combat discrimination. No one should face discrimination or be disadvantaged based on race, skin colour, nationality, political beliefs, religion, age, physical appearance, or any other personal characteristics.

The Group is committed to fostering equity and inclusion, ensuring that every person is treated with dignity, honesty, fairness, and integrity and that decisions related to hiring, promotions, training, and development are based on qualifications, performance, and merit.

At Safic-Alcan, any form of harassment is strictly prohibited and will not be tolerated. Harassment is defined as any unwelcome behaviour that creates an intimidating, hostile, non-inclusive, or offensive work environment. This can include verbal remarks, physical advances, inappropriate entertainment or offensive visual content.

The use or circulation of offensive materials, inappropriate comments, or "humour" at another's expense undermines mutual respect and is unacceptable in workplace.

Harassment can come from colleagues, managers, suppliers, contractors or customers.

Safic-Alcan expects all its employees to not engage in acts of harassment or discrimination and to treat each other and their business partners with respect.

Examples of unacceptable behaviour:

Discrimination:

- Refusing to hire someone because of their race.
- Denying promotions based on gender.
- Segregating facilities based on disability.

Harassment:

- Making offensive comments or jokes about someone's religion.
- Engaging in unwanted sexual advances.
- Creating a hostile work environment through verbal abuse.

No forced and child labour

Safic-Alcan is committed to upholding the fundamental rights and freedoms of all individuals, including the right not to be subjected to human trafficking, forced or compulsory labour, and modern slavery. It strictly opposes all forms of exploitation, coercion, and involuntary labour, and ensures that all work performed on its behalf is voluntary and conducted with respect for human dignity.

Safic-Alcan complies with all applicable child labour laws and actively supports the global effort to eliminate unlawful child labour and exploitation to ensure that no minors are employed in harmful or exploitative labour practices.

Safic-Alcan expects all its suppliers to adhere to high ethical standards, including fair labour practices and respect for human rights and to align with its Third-Party Code of Conduct. This includes vigilance regarding conflict minerals to prevent child labour, forced labour and the financing of armed Groups in politically unstable areas.





Ensure Business Ethics and Compliance

Internal references:

- Group Compliance procedures
- Third-Party Code of Conduct

Safic-Alcan is doing its utmost to comply with ethical principles and values in its relationships with third parties and in all aspects of its operations.

Safic-Alcan sells and purchases products and services based on criteria including competitive pricing, quality of materials, added value services, and timely performance. This means Safic-Alcan employees never give, offer, or accept improper payments or the facilitation of payments in any form.

Employees are bound by their employment contracts with Safic-Alcan to advance the Group's business interests under all circumstances and in accordance with applicable laws and this Code, and not to let personal gain or advantage interfere with the performance of their duties towards Safic-Alcan.

Conflicts of interest

A conflict of interest occurs when an employee's private interest interferes or appears to interfere with the interests of the Group. A conflict of interest may arise not only from an employee's own private interests, but also from situations involving close family members or personal relations whose interests could influence the employee's decisions or actions.

Conflicts of interest are prohibited as a matter of Group policy, unless they have been formally assessed by the ExCom and the Compliance Chief Officer. Employees must disclose any potential conflicts of interest, allowing the Group to evaluate them.

Any employee who become aware of a conflict of interest, instance of favouritism or any material transaction or relationship that could be reasonably expected to give rise to such a conflict, is required to promptly discuss the matter with the appropriate Managing Director who has to inform the ExCom and Compliance Chief Officer and, unless the conflict is deemed acceptable, to take all action necessary or appropriate to resolve the conflict.

Examples of unacceptable behaviour:

- Holding a significant ownership interest in any supplier or customer.
- Entering into any consulting or employment relationship with any supplier, customer or competitor.
- Engaging in any outside business activity that impairs the employee's ability to devote appropriate time and attention to their responsibilities within the Group.
- Accepting gifts from any company with which the Group has current or prospective business dealings.

- Participating in the recruitment of an immediate family member, and being in the position of supervising, reviewing or having any influence on the job evaluation, pay or benefit for any immediate family member of an employee;
- Selling to or buying from the Group, except under the same terms and conditions as those under which comparable officers or directors are permitted to buy or sell;
- Receiving any improper personal benefits, directly or through a family member, as a result of the employee's position in the Group.

Combatting corruption and influence peddling

In strict compliance with the provisions of the applicable corruption laws, Safic-Alcan adopts a zero-tolerance policy towards corruption and influence peddling. This commitment applies to all employees, officers, and stakeholders acting on behalf of Safic-Alcan.

Corruption and influence peddling undermine fair competition, erode trust, and jeopardise the reputation and sustainability of the Group. Under no circumstances should any of Safic-Alcan employees offer, promise, give, request, or accept undue benefits or advantages, whether monetary or otherwise, to influence decisions or gain an improper advantage. This includes both active and passive bribery, whether when dealing with public officials or private parties, domestically or internationally.

To uphold these principles, the Group has implemented a robust anti-corruption compliance program, which includes:

1. A comprehensive risk mapping process to identify and assess areas vulnerable to corruption.
2. Internal policies and procedures to mitigate and manage corruption risks effectively.
3. A whistleblowing system that enables individuals to report suspected corruption or unethical behaviour confidentially and without fear of retaliation.
4. A mandatory training program to raise awareness necessary to identify and prevent corrupt practices.
5. Regular audits and assessments to monitor compliance and ensure the effectiveness of anti-corruption measures.

Gifts, entertainment and travel

Safic-Alcan recognises that the exchange of small courtesies with its business partners develops and strengthens relationships—but never gives or receives gifts or entertainment that inappropriately influence or appear to influence its business decisions, or that come into conflict with its values.

These interactions must always be transparent, reasonable, and within the bounds of appropriate business practices.

- **Gifts**

Likewise, employees are not permitted to provide or receive gifts with the intent of inappropriately influencing or inducing business decisions. In fact, such practices not only go against Group policy, but also may violate anti-corruption laws. This is true regardless of whether gifts are given or received.

These situations may arise during interactions with suppliers, customers, government officials or other business stakeholders. Any third parties conducting business on Safic-Alcan's behalf must also follow these principles.

Employees may accept gifts only if they are of a reasonable value and are given in a manner consistent with business customs. It is important to make it clear to their contacts that they accept the gift as Safic-Alcan and not personally.

Gifts that are cash, or items that are extravagant or excessive, must be declined.

- **Entertainment**

Employees may participate in or accept invitations as well as invite partners to business-related entertainment (such as restaurants, events, or recreational activities) only if the occasion is related to the Company's business interests, has a proportionate value and does not place the employee in a position of obligation. Entertainment must not be used as a means to gain an improper advantage.

- **Travel**

From time to time, there may be a business justification for providing business travel, including accommodation for a third party, or receiving free or discounted business travel or accommodation from a third party. Any such travel is subject to special rules and employees must obtain prior written approval from a Managing Director.

On occasion, the Company may reimburse the travel-related expenses of a spouse, family member, or other relative when justified by legitimate business purposes. These reimbursements are subject to special rules, and employees must apply for the written approval of the ExCom by providing a description of the business purpose along with the request for the reimbursement of expenses.

- **Reporting and transparency**

To ensure transparency, employees are required to disclose any gifts, entertainment or travel offered, whether accepted or declined, to their Managing Director if their value exceeds the maximum amount authorised by the Group Compliance Procedure.

This allows the Company to monitor compliance with the relevant policies and ensure that ethical standards are upheld.

Payments for products and services

Safic-Alcan is committed to sound business practices in all of its relationships with customers, suppliers, and other business associates. Safic-Alcan employees must exercise good judgment in all circumstances to avoid the risk of inappropriate conduct.

Sales-related commissions, rebates, discounts, credits, and allowances are customary business payments. However, the Group must ensure that these do not include illegal or unethical payments and must comply with applicable currency exchange controls and regulations.

Antitrust and competition laws

Competition laws are designed to encourage competition in business for the benefit of the consumer. It is Safic-Alcan's policy to comply fully with all applicable competition laws. Committed to competing based on the quality of its products and services, Safic-Alcan will never engage in or support unfair or predatory business practices or any activities that could negatively affect lawful trade. It is also critical that employees avoid any activity that could violate or give the appearance of violating competition laws.

In all contact with competitors, employees must avoid any conduct that suggests that there is an understanding or agreement with respect to prices, terms of sale, production for third parties, or the allocation of customers, markets, or territories.

To this end, avoid any discussion or communication with any representative of a competitor concerning the following:

- Prices or pricing policies
- Bids
- Discounts, rebates, royalties, or promotions
- Credit or shipment terms, or other conditions of sale
- Choice of customers or allocating customers between competitors
- Dividing up a territory between competitors

Membership in trade associations and industry groups frequently means having to attend meetings with competitors. Employees must be aware of antitrust related topics and activities and must never talk with other members about their business's current or future prices or marketing efforts.

When the conversation strays into commercially sensitive topics, they should make other members aware and pull the discussion back on track. If that does not help, they should leave the meeting and ensure that their concerns are clearly documented in the minutes.

Sanctions, embargoes and export controls

U.S. and other global laws relating to embargoes and sanctions prohibit transactions with a country or entity subject to these sanctions or embargoes. This also applies to deals made indirectly through third-party business partners.

Safic-Alcan must comply with trade sanctions and similar restrictions issued by recognised authorities.

Any proposed dealings with a country or entity subject to these sanctions or embargoes must be reviewed by the Compliance Committee to determine whether the proposed transaction is lawful.

Safic-Alcan must ensure that its business practices comply with all applicable laws, directives and regulations governing counterfeit products and the import and export practices.





Act with Respect for the Environment and Product Responsibility

Internal references:

- Climate Strategy
- Third-Party Code of Conduct

Product stewardship

Safic-Alcan is committed to handling chemicals safely and reliably. As such, product stewardship is essential to managing the health, safety, and environmental impacts of the chemical products the Group distributes to its customers.

By integrating comprehensive health, safety and environmental (HS&E) practices and quality and regulatory management, Safic-Alcan ensures that its products are handled responsibly and adhere to stringent safety and environmental standards. The Group's sub-contractors and suppliers must also comply with the safety and quality standards of their markets.

To help their customers understand the best practices for using chemicals safely and reducing the risk of accidents and exposure, Safic-Alcan employees collect comprehensive information from their suppliers and provide their customers with technical support and clear information on safe handling, use, storage, and disposal.

By following these principles, the Group ensures the safety and well-being of its customers, employees, and the broader community, while protecting the environment.

Environment

As a major player in the distribution of specialty chemicals to the formulation industries, Safic-Alcan takes environmental stewardship to heart and is committed to complying with the environmental regulations applicable to its sectors.

Safic-Alcan understands that maintaining safe and sustainable operations has an impact not only on its business, but also on the environment and individuals. To drive internal and external change, the Group relies on innovative collaboration as part of a continuous improvement approach with its stakeholders.

In this context, Safic-Alcan aims to integrate and promote sustainable environmental best practices into all its operations and into its value chain. To do so, the Group is committed to lowering its value chain footprint through:

- Enhancing awareness and engaging its employees.

- Reducing its greenhouse gas emissions by complying with its Climate Strategy and contributing to the achievement of its defined reduction targets.
- Implementing waste management practices to minimise environmental impact.
- Limiting, when possible, the distribution of substances of concern and high concern.
- Ensuring the responsible use of energy.
- Working with suppliers who promote sound environmental practices and animal welfare.
- Contributing to the fight against deforestation and complying with international agreements like CITES and the Nagoya Protocol, when applicable.
- Encouraging fair-trade initiatives and responsible farming practices, ensuring respect for local communities and Indigenous Peoples' rights.
- Developing a sustainability-advantaged product portfolio.

All employees are expected to actively participate in and support Company's environmental initiatives, ensuring that sustainable practices are consistently implemented and upheld in all aspects of Safic-Alcan's operations.





Protect Financial Integrity and Assets

Internal references:

- Privacy Policy
- Social Media Policy
- Information Systems Security Policy

As members of Safic-Alcan Group, employees are entrusted with its financial resources and assets. Maintaining integrity in financial practices and safeguarding its assets is critical to the long-term success and reputation of the Group.

Each employee is responsible for ensuring that financial transactions are transparent, accurate, and fully comply with Company's policies and legal requirements. Safic-Alcan employees must also take the necessary steps to prevent the misuse, loss or theft of organisational assets, intellectual property, and confidential information.

Fraud

Keeping accurate records also helps Safic-Alcan prevent and detect fraud. Fraud generally involves taking something one is not entitled to, or lying to receive something of benefit for oneself. It is prohibited, both within the Group and in all external dealings.

Fraud specifically includes:

- Theft of Safic-Alcan property.
- Money laundering.
- Irregularities involving money transactions.
- Falsification of expense statements, time records or any other Company records.
- Misappropriation of supplies, or any other Company assets.

Fraud also includes any irregularities or suspicions of irregularity involving suppliers, customers or agencies.

Accurate Books and Records

Safic-Alcan is accountable for providing its stakeholders with a reliable representation of its performance. Employees are responsible for ensuring the integrity, completeness, and accuracy of the Group records they prepare or maintain.

When performing their duties, all employees are prohibited from knowingly misrepresenting facts or causing others to misrepresent facts about the Group to others, whether within or outside Safic-Alcan, including to their independent auditors, governmental regulators and self-regulatory organisations.

Employees will be considered to have misrepresented facts if, among others, they:

- make or permit or direct others to make materially false or misleading entries in the financial statements or records of Safic-Alcan or any of its subsidiaries;
- fail to correct materially false or misleading financial statements or records;
- sign or permit others to sign documents containing materially false or misleading information;
- falsely respond or fail to respond to inquiries by Safic-Alcan's auditors.

Managing Directors are liable for the Company's regulatory filings and submissions and other public communication concerning its general business, results of operations, financial status and prospects.

Adequate supervision includes properly reviewing and critically analysing the material that will be made public for accuracy and completeness (or, where appropriate, delegating this task to others), and to the extent appropriate, consulting with other Group officers and employees, with the goal of making full, fair, accurate, timely and easy to understand disclosures.

In doing so, each Managing Director is required to observe both the form and the spirit of all applicable laws, governmental rules and regulations, and accounting standards.

Protection of information

Safic-Alcan has deployed a range of Group protocols and actions to ensure that everyone is aware of and complies with data protection, information systems security and confidentiality guidance to prevent any intrusion, hacking attempts, or unauthorised access to the company's systems and data. Employees must comply with Group guidance.

- **Personal data**

Safic-Alcan has a responsibility to uphold everyone's right to privacy. The way the Group collects, stores and uses personal data is an important factor in maintaining the trust of its stakeholders and is carried out in accordance with the Regulation (EU) 2016/679 of 27 April 2016 (known as the 'GDPR').

- **Trade secrets**

Trade secrets are defined as information that has commercial value and provides an economic advantage because it is not generally known or readily accessible to people within the relevant business sector, and that has been subject to reasonable efforts to maintain its confidentiality by the person lawfully in control of it (Directive (EU) 2016/943). Trade secrets are legally protected, and unauthorised use or disclosure may lead to sanctions. For these reasons, safeguarding trade secrets is a high priority for the Group.

Consequently, business secrets and other confidential information must be protected from onward transmission to unauthorised persons (these also include members of the family and friends).

When preparing documents, it should be taken into consideration that any written piece of paper and any data support could fall into the hands of a competitor or a legal opponent in the worst possible case and could be used against the Group. This should be taken into account when drawing up documents, including e-mails.

- **Confidential information provided by other companies**

Safic-Alcan's policy is to not accept information that could be deemed confidential, restricted, or limited in its disclosure or use, unless a written agreement specifying the rights and obligations of all parties has been approved by the Legal department and signed by an authorised representative of each party.

- **Information about other companies**

Safic-Alcan will not engage in any illegal or unethical behaviour in order to obtain another company's trade secrets or other confidential information. Safic-Alcan must never expect employees who formerly worked for a competitor to reveal that company's confidential information.





Speak-up: Report Concerns!

Internal reference:

- Whistleblowing System Procedure

Safic-Alcan's reputation is protected by asking questions and raising concerns in challenging situations. Integrity requires individuals to speak up honestly when they suspect problems or mistakes, and to hold each other accountable.

Safic-Alcan encourages a culture of openness where employees can raise their concerns, express their views, defend their opinions, and point out unacceptable behaviours and demands.

Seeking advice

When faced with questionable business conduct or legal uncertainties, Safic-Alcan employees have the right to seek guidance. They should never hesitate to ask their direct manager for help if they find themselves in a situation where they are unsure of what to do.

Reporting irregularities

Safic-Alcan encourages the responsible reporting of any potential Code violations.

All employees must promptly bring any situations that may constitute violations of the Code or the law to their local management, as timely reporting may be critical in preventing harm.

However, if contact with local management is not appropriate, various reporting channels are available to raise concerns to the whistleblower referents:

- Email: reporting.concernes@safic-alcan.com
- Online form (anonymous): <https://forms.office.com/e/A2JcxqJsuX>
- Phone: +33 (0)1 46 92 63 46
- Mail : 13, Cours Valmy – Tour Pacific, 92977 Paris La Défense Cedex, France

Investigations

Whistleblower referents are the members of the Compliance Committee who receive all misconduct reports. They treat all such reports seriously and confidentially. Referents' names are available on My Safic Global - Compliance Committee section.

Violations and potential violations will be reported to the ExCom, if appropriate. A dedicated team will investigate all reports with the potential assistance of the Compliance Committee.

If the ExCom determines that a material violation has occurred, it will inform the Group Supervisory Board. Otherwise, the ExCom will consider whether, in light of all relevant facts and circumstances, the violation warrants disciplinary or preventive action and, if so, will take such measures as it deems appropriate.

Violations of this Code may result in disciplinary action, including but not limited to counselling, training, suspension, or termination of employment. All reports will be thoroughly investigated, and appropriate action will be taken.

No retaliation

The Group values employees' help in identifying any potential problems that the ExCom may need to address. Speaking up is always the right thing to do.

Legislation in a number of countries (e.g. in France, the 'Sapin II' law of 19 April 2017) provides legal protection for employees who report in good faith. The Company will provide the same protection to employees in countries where this kind of legislation does not currently exist.

As such, no disciplinary action or retaliation will be taken against an employee for bringing a concern to the attention of Management in good faith, even if the investigation determines that no violation could be found. However, if it is found that an employee has deliberately raised false and malicious allegations, disciplinary action will be taken.



Headquarters:

Safic-Alcan SAS

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