



# Safic-Alcan 集团 行为准则

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2025年

# 目录

---

首席执行官致辞	第 1 页
术语表	第 3 页
集团价值观	第 7 页
行为准则指南	第 9 页

---

尊重劳动者权利和人权	第 13 页
<ul style="list-style-type: none"><li>• 提供健康安全的环境</li><li>• 打击歧视和防止骚扰</li><li>• 拒绝强迫劳动和童工</li></ul>	

---

保障商业道德与合规性	第 17 页
<ul style="list-style-type: none"><li>• 利益冲突</li><li>• 打击腐败和钱权交易</li><li>• 礼品、招待和旅行</li><li>• 产品和服务付款</li><li>• 反垄断和竞争法</li><li>• 制裁、禁运和出口管制</li></ul>	

---

以尊重环境和产品责任的方式行事	第 25 页
<ul style="list-style-type: none"><li>• 产品监管</li><li>• 环境</li></ul>	

---

保护财务诚信和资产	第 29 页
<ul style="list-style-type: none"><li>• 欺诈</li><li>• 准确的账簿和记录</li><li>• 信息保护</li></ul>	

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发声：报告疑虑！	第 34 页
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INNOVATIVE  
SOLUTIONS

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# 首席执行官致辞

Safic-Alcan 及其子公司 ("Safic-Alcan "或 "集团 "或 "公司") 致力于践行《联合国全球契约》(UNGC) 和 "责任关怀倡议" (Responsible Care Initiative)，在过去几年中制定了以可持续发展为创新动力的发展战略。

Safic-Alcan 集团业务遍及众多国家，而每个国家都有其独特的文化、法律框架和政治制度。作为一家全球性企业，无论在公司层面还是作为个人，我们都致力于以促进可持续发展和合乎道德的方式开展所有商业活动。这一承诺建立在我们全面遵守运营所在国的法律以及与我们行业相关标准的基础上。

为履行该承诺，我们制定并定期更新了适用于集团所有员工的《行为准则》(以下简称 "准则")。准则作为一个共识，指导我们如何进行团队协作，如何与我们的主要利益相关者互动，体现了我们的价值观和 Safic-Alcan 的经营理念。

本《行为准则》和集团内部政策旨在为我们的共同文化和经营方式奠定基础，其重点是预防腐败、建立信任和培育长期关系。我们共同致力于营造卓越和责任感的企业文化做出贡献，从而巩固我们作为化学品分销行业值得信赖的领导者的声誉。

我们集团的所有成员都应理解并遵守本《行为准则》中规定的条款。

我谨代表执行委员会，感谢各位对这些原则的接受与承诺，感谢你们帮助我们坚持 Safic-Alcan 的标准。

**Yann LISSILLOUR, Safic-Alcan集团首席执行官**



# 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**



# 术语表

**包容**是指创造一个关爱和安全的环境，让任何个人或群体都能受到欢迎、尊重、支持和重视。

**不当利益**是指任何以不正当方式，无正当理由或违反法律、法规或道德标准的情况下，提供、许诺、给予或接受的任何利益、特权或优惠（无论是经济上的还是其他方面的）。

例如，金钱利益（如贿赂、回扣）、超过合理限度的礼物或招待、优待（如不择优录用）、获取机密信息，或许诺未来的利益（如合同或晋升）。

**多元化**是指定义员工的各种特征，包括种族、社会或文化背景、宗教信仰、年龄和性别、性取向、教育水平、残疾状况等。

**腐败**是指直接或间接提议、许诺、给予、索取或接受任何经济或其他方面的不正当利益，以影响任何公共或个人/公司的决策、行动或不作为。腐败可以是主动的（行贿者），也可以是被动的（受贿者）。

**公平原则**是指为所有员工提供成功所需的资源和机会，同时考虑到个体差异。与对所有人一视同仁的平等原则不同，公平原则将调整策略来弥补个人差异的不利因素。

**好处费**是指为了方便或加快行政程序（如许可证）而支付的费用，通常是未经正常流程和规则授权支付给政府官员或雇员，此类的行为在许多国家，被视为腐败。

**举报人**是指在没有直接经济补偿的情况下，善意举报有关犯罪、威胁、损害公共利益或任何违反国家或国际标准的信息的人。举报人通过举报可疑的不当行为、非法活动或任何可能损害组织声誉、员工或合作伙伴的行为，在帮助维护组织内的道德标准方面发挥着至关重要的作用。

**廉正**（法文为Probité），是指组织和个人承诺以透明、合乎道德的方式行事，并遵守反腐败法律。它涉及预防和发现腐败风险，促进问责制，确保业务决策公平合法，而不是谋取个人利益或不当影响。

**利益冲突**是指一个人可以从其职业身份采取的行动或做出的决定中获得个人利益的情况。

**利益相关者**是指能够影响公司实现其目标或受其影响的个人或群体。利益相关者可以与公司有直接或间接的关系。利益相关者可以是内部的（经理、员工、董事等），也可以是外部的（股东、合作伙伴、客户、供应商、竞争对手等）。

**歧视**是指对不同类别人群的不公正或偏见性待遇，尤其是基于种族、年龄、性别或残疾为由的区别对待。

**骚扰**是指施加攻击性的压力或恐吓。包括基于种族、肤色、宗教、性别（包括性取向、性别认同或怀孕）、民族血统、年龄、残疾等各种因素的各种不受欢迎的行为。

**洗钱**是指通过复杂的金融交易掩盖非法所得资金的来源，使其合法化的过程。

**徇私**是指在招聘、晋升、供应商选择或合同授予等商业决策中，基于个人关系、友谊或其他不当影响而非客观标准，对某些个人或实体给予不公平或有偏见的对待。这种做法破坏了透明度、诚信和公平竞争，使公司面临腐败风险。

**以权谋私**是指提供或接受利益，以换取利用或提议利用自身对决策者的实际或假定影响力。

# 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.

# 集团价值观

在 Safic-Alcan，我们致力于成为特种化学品行业的领先合作伙伴，提供创新的解决方案。我们致力于追求卓越、可持续发展和客户满意度，是所有利益相关者之间的持久纽带。

我们的核心价值观指导着我们的一举一动，并定义了我们的企业形象。企业家精神、责任感、专业知识和信任构成了我们与客户、合作伙伴和员工之间关系的支柱。我们鼓励创新，同时确保对所有利益相关者负责。

凭借我们团队的敬业精神和专业技能，我们提供尖端解决方案，同时在透明和可靠的基础上建立合作关系。秉持这些价值观，我们确保所做的每一件事都能产生积极而持久的影响。



创业精神 是我们公司的核心动力。我们崇尚创新精神，我们的全球成功源于本地领导者的创业思维，这驱使使我们不断开拓新的视野，注重贴近客户，并迅速适应我们行业不断变化的需求。



我们对客户、供应商、员工和周围的整体环境怀有深深的责任感。我们关心所有利益相关者的福祉，通过我们致力于提供卓越服务、负责任的实践、可持续的原料选择方法以及对我们的行动的持久影响的真正关注，确保他们的成功和满意。



我们的团队由技术精湛的技术人员组成。我们对专业知识的承诺以及随之而来的创新，是我们开展业务的首要任务，也是我们提供所有解决方案的基础。我们持续投资于团队知识的发展和提高，以提供最尖端的服务。

我们对工业特种化学品领域的精通以及对市场趋势的了解，确保了我们的客户、供应商以及所有利益相关者都能从最高水平的技术能力和行业洞察力中获益。



信任 是我们人际关系的基础。我们通过透明、诚信和可靠与客户、供应商和员工建立和维护信任。我们在全球范围内取得的成功证明了我们所赢得的信任，我们深知通过始终如一地履行承诺和保持最高道德标准来维护我们声誉的重要性。

# 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.

# 行为准则指南

## 治理

Safic-Alcan 成立了合规委员会，协助集团所有员工了解并履行其法律、道德和监管义务。合规是每个人的责任，为确保其原则得到尽可能广泛的采用，Safic-Alcan 公司实施了一种治理结构。这包括

- Safic-Alcan 的首席执行官和执行委员会 (ExCom)，均在各自领域内促进集团对道德、社会和环境责任的承诺。
- 合规委员会由执行委员会以及财务控制、法律、质量管理、人力资源和环境、社会和公司治理部门的代表组成。委员会监督本守则的遵守情况
- 常务董事确保所有实体的员工正确执行本《准则》中规定的原则
- 创新与可持续发展委员会负责协调集团环境保护、社会责任和公司治理 (ESG) 战略责任目标的实施工作

所有管理人员都有责任体现《行为准则》的承诺，并在其团队中加以推广。  
所有员工在任何情况下都必须亲身践行这些原则。

## 资源

有许多资源可供所有员工使用：

- Safic-Alcan 公司向合规委员会提交问题的政策和程序可在其内部网上的 "我的 Safic Global - 合规" 部分查阅。
- 培训也可在其电子学习平台 Safic'Academy 上进行。
- 其承诺符合国际行业标准。更多信息请访问以下网站。

[联合国全球契约](#)

[经合组织跨国企业负责任商业行为准则](#)

[联合国工商业与人权指导原则](#)

[国际劳工组织 \(ILO\)](#)

[世界人权宣言](#)

[联合国儿童权利宣言](#)

[联合国土著人民权利宣言](#)

[《生物多样性公约》和《获取和惠益分享名古屋议定书》](#)

[《濒危野生动植物种国际贸易公约》](#)

## 范围和适用性

根据适用标准，本《准则》适用于集团各级所有员工，包括全职、兼职和临时员工。

## 本地适用

由于本文件适用于整个集团，因此可对其进行翻译，但不得进行其他改编。

## 传播

该守则可在 Safic-Alcan 网站和集团内网的 "我的 Safic Global - 合规" 栏目中找到，并有多种语言版本可供下载。

## 做出正确的决定

任何文件都无法预见和应对可能出现的各种情况。因此，每当您面临此类决定时，请扪心自问以下问题：

- 合法吗？
- 是否符合我们的《准则》和其他政策？
- 是否符合公司的核心价值观、目标和利益？
- 如果我的决定在内部或外部公开，我会感到安心吗？

如果上述任何问题的答案是否定的，或者如果您有任何疑问，您必须咨询适当的联系人（执行委员会、您的管理层或合规委员会，邮箱为 [compliance.committee@safic-alcan.com](mailto:compliance.committee@safic-alcan.com) 或直接咨询），在采取行动之前公开讨论此事。

## 修订

Safic-Alcan 公司承认，行为准则并非详尽无遗，其内容可能会定期更改。Safic-Alcan 公司保留随时更改本守则的权利，无论通知与否。

版本 1	2018 年8月
第 2 版	2018 年10月
第 3 版	2025年5月

# 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](mailto: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



# 尊重劳动者权利和人权

内部参考资料:

- 集团人力资源政策;
- 第三方行为准则;
- Safic-Alcan 冲突矿物立场。

Safic-Alcan 致力于维护劳动者权利和人权，确保在整个集团内坚持非歧视和公平就业，提供安全健康的工作场所，并遵守所有相关法律和标准。

Safic-Alcan 不断审查和改进其政策，以营造一个相互尊重和包容的环境，并坚信所有员工、客户和供应商都必须得到尊重、尊严、诚实、公平和正直的对待。

## 提供健康安全的环境

Safic-Alcan 致力于为所有在我们的场所工作或参观我们设施的员工、承包商和来访者提供一个安全的工作环境。我们的目标是实现零事故。

每个人都有责任优先考虑健康和​​安全，遵守与工作场所健康和​​安全相关的公司政策和程序，以及任何适用的，更高标准的当地法律和法规。

## 打击歧视和防止骚扰

Safic-Alcan 公司的多元化战略不仅旨在代表广泛的背景，也旨在积极反对歧视。任何人都不应因种族、肤色、国籍、政治信仰、宗教、年龄、外貌或任何其他个人特征而受到歧视或处于不利地位。

集团致力于促进公平和包容，确保每个人都享有尊严、诚实、公平和正直的对待，并确保与招聘、晋升、培训和发展相关的决定都是基于资历、业绩和能力。

在 Safic-Alcan，任何形式的骚扰都是严格禁止，也是不能容忍的。骚扰的定义是任何不受欢迎的、造成恐吓、敌意、不包容或冒犯性工作环境的行为。这可能包括口头评论、肢体侵犯、不适当的娱乐活动或令人反感的视觉内容。

使用或传播攻击性材料、拿他人开玩笑的"幽默"会破坏相互尊重，这在我们的工作场所是不可接受的。

骚扰可能来自同事、经理、供应商、承包商或客户。

Safic-Alcan 希望其所有员工不参与骚扰或歧视行为，并尊重彼此及其业务伙伴。

### 不可接受的行为举例：

#### 歧视:

- 因种族原因拒绝雇用某人
- 基于性别拒绝晋升某人
- 基于残疾情况进行设施分隔

#### 骚扰:

- 对他人的宗教进行攻击性评论或开玩笑
- 进行不受欢迎的性挑逗
- 通过辱骂制造不友好的工作环境

## 拒绝强迫劳动和童工

Safic-Alcan 致力于维护所有人的基本权利和自由，包括免受人口贩卖、强迫或强制劳动以及现代奴役的权利。Safic-Alcan 坚决反对一切形式的剥削、胁迫和非自愿劳动，并确保其代表公司开展所有工作均为自愿性质，并且是在受到尊重的情况下进行的。

Safic-Alcan 公司遵守所有适用的童工法律，并积极支持全球消除非法童工和剥削的努力，以确保不雇用未成年人从事有害或剥削性的劳动。

Safic-Alcan 公司希望其所有供应商遵守高道德标准，包括公平的劳动实践和尊重人权，并遵守其《第三方行为准则》。这包括对冲突矿产保持警惕，防止童工、强迫劳动和在政治不稳定地区为武装团体提供资金。





# 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.





# 保障商业道德与合规性

内部参考资料:

- 集团合规程序;
- 第三方行为守则.

Safic-Alcan 公司竭尽全力在与第三方的关系以及在其运营的各个方面遵守道德原则及其价值观。

Safic-Alcan 公司销售和采购产品与服务的标准包括：有竞争力的价格、材料质量、增值服务和及履约。这意味着 Safic-Alcan 的员工绝不以任何形式给予、提供或接受不正当的报酬或便利。

根据与 Safic-Alcan 集团签订的工作合同，员工在任何情况下都必须根据适用法律和本准则促进集团的商业利益，不得因个人利益或好处而影响履行对 Safic-Alcan 集团的职责。

## 利益冲突

当员工的私人利益干扰或体现出干扰了集团的利益时，就会发生利益冲突。利益冲突不仅可能源于员工自身的私人利益，也可能源于涉及其利益可能影响员工决策或行动的近或个人关系的情况，而这些成员的利益可能会影响员工的决策或行动。

集团应避免并禁止任何利益冲突，除非经执行委员会和首席合规官进行了正式评估。员工必须披露任何潜在的利益冲突，以便集团进行评估。

任何员工如发现利益冲突、徇私行为或任何重大交易或关系可能会引起此类冲突，都必须立即与相关常务董事讨论此事，常务董事必须通知执行委员会和首席合规官，除非冲突被认为是可以接受的，否则必须采取一切必要或适当的行动来解决冲突。

### 不可接受的行为举例：

- 持有任何供应商或客户的重大所有者权益；
- 与任何供应商、客户或竞争对手建立任何咨询或雇用关系；
- 从事任何影响员工投入适当时间和精力履行其在集团内职责的能力的外部业务活动；
- 接受与集团当前或潜在业务往来的任何公司的礼品；
- 参与直系亲属的招聘工作，担任监督、审查或影响员工任何直系亲属的工作评估、薪资或福利的职务；
- 向集团出售或从集团购买，除非在与同类高级管理人员或董事购买或出售时所适用的相同条款和条件下进行；
- 利用其在集团的职位而直接或通过家庭成员接受任何不正当的个人利益。

## 打击腐败和钱权交易

Safic-Alcan 严格遵守适用的反腐败法律规定，对腐败和钱权交易采取零容忍政策。这一承诺适用于代表 Safic-Alcan 集团行事的所有员工、管理人员和利益相关者。

腐败和钱权交易破坏公平竞争，破坏信任，并危及集团的声誉和可持续发展。在任何情况下，Safic-Alcan 公司的任何员工都不得提供、承诺、给予、要求或接受金钱上或其他方面的不正当利益或好处，以影响决策或获得不正当的好处。这包括行贿和受贿，无论是在与公职人员或私人打交道时，还是在国内或国际上。

为了坚持这些原则，集团实施了一套强有力的反腐败合规计划，其中包括

- 全面的风险摸底程序，以识别和评估容易发生腐败的领域。
- 有效减少和管理腐败风险的内部政策和程序。
- 举报制度，使个人能够秘密举报涉嫌腐败或不道德行为，且无需担心遭到报复。
- 强制培训计划，以提高识别和预防腐败行为的必要意识。
- 定期审计和评估，以监督合规情况并确保反腐败措施的有效性。

## 礼品、招待和旅行

Safic-Alcan 认识到，与商业伙伴之间互赠小礼品有助于发展和加强合作关系，但不适当的礼品或招待活动会影响或似乎会影响其商业决策，或与其价值观相冲突，此情况下绝不应赠送或接受此类礼品或招待活动。

这些互动必须始终透明、合理，并符合适当的商业惯例。

### • 礼品

同样，员工也不得以不当影响或诱导业务决策为目的提供或收受礼物。事实上，这种做法不仅有悖于集团政策，还可能违反反腐败法。无论送礼还是收礼都是如此。

这些情况可能会在与供应商、客户、政府官员或其他业务利益相关者的互动中出现。任何代表 Safic-Alcan 开展业务的第三方也必须遵守这些原则。

员工只能接受价值合理且符合商业惯例的礼品。重要的是要让他们的联系人明白，他们接受的是 Safic-Alcan 的礼物，而不是个人的礼物。

必须拒绝现金、奢侈或过分的物品。

### • 招待

员工可以参加或接受邀请，也可以邀请合作伙伴参加与业务相关的娱乐活动（如就餐、主题活动或休闲活动），但前提是这些活动必须与公司的业务利益相关，具有相应的价值，且不会使员工处于强制义务的地位。不得将招待用作获取不正当利益的手段。

### • 旅行

有时，出于商业原因，可能需要为第三方提供商务旅行（包括住宿），或接受第三方的免费或优惠商务旅行或住宿。任何此类旅行都必须遵守专门规定，员工必须事先获得总经理的书面批准。

有时，公司可能会报销配偶、家庭成员或其他亲属的差旅费用吗前提是这些费用出于合理的业务目的。此类报销须遵守特殊规定，雇员在申请报销费用时，必须提供业务目的说明，申请执行委员会的书面批准。

- **报告和透明度**

为确保透明度，无论接受或拒绝，如果其价值超过《集团合规程序》批准的最高金额，员工必须向其总经理披露所提供的任何礼品、招待或旅行。

公司能够凭此监督相关政策的遵守情况，并确保道德标准得到维护。

## **产品和服务付款**

Safic-Alcan 公司致力于在与客户、供应商和其他商业伙伴的所有关系中遵循良好的商业惯例。

Safic-Alcan 公司员工在任何情况下都必须保持良好的判断力，避免不当行为的风险。

与销售有关的佣金、回扣、折扣、信用额度和折让都是常规的商业付款。但是，我们必须确保这些付款不包括非法或不道德的付款，并且必须遵守适用的货币兑换管制和法规。

## **反垄断和竞争法**

竞争法旨在鼓励商业竞争，使消费者受益。Safic-Alcan 公司的政策是全面遵守所有适用的竞争法。Safic-Alcan 承诺以产品和服务质量为竞争基础，绝不参与或支持不公平或掠夺性的商业行为或任何可能对合法贸易产生负面影响的活动。同样重要的是，员工应避免任何可能违反或看似违反竞争法的活动。

在与竞争对手的所有接触中，员工必须避免任何暗示在价格、销售条款、为第三方生产或分配客户、市场或地区方面存在谅解或协议的行为。

为此，应避免与竞争对手的任何代表就以下方面进行任何讨论或交流：

- 价格或定价政策；
- 投标；
- 折扣、返利、使用权费用或促销；
- 信贷或装运条款，或其他销售条件；
- 选择客户或在竞争对手之间分配客户；
- 在竞争对手之间划分地盘。

加入行业协会和行业团体往往意味着必须参加与竞争对手的会议。员工必须了解与反垄断相关的话题和活动，绝不能与其他成员谈论自己企业当前或未来的价格或营销活动。当谈话触及商业敏感话题时，他们应提醒其他成员，并将讨论拉回正轨。如果无济于事，他们应离开会场，并确保在会议记录中明确记录他们的担忧。

## 制裁、禁运和出口管制

美国及全球其他有关禁运和制裁的法律禁止与受制裁或禁运的国家或实体进行交易。这也适用于通过第三方业务合作伙伴间接达成的交易。

Safic-Alcan 公司必须遵守贸易制裁和公认机构发布的类似限制。

任何与受制裁或禁运的国家或实体的拟议交易都必须经过合规委员会的审查，以确定拟议交易是否合法。

Safic-Alcan 公司必须确保我们的商业行为符合有关假冒产品和进出口行为的法律、指令和规定。





# 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:

- A comprehensive risk mapping process to identify and assess areas vulnerable to corruption.
- Internal policies and procedures to mitigate and manage corruption risks effectively.
- A whistleblowing system that enables individuals to report suspected corruption or unethical behaviour confidentially and without fear of retaliation.
- A mandatory training program to raise awareness necessary to identify and prevent corrupt practices.
- 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.





# 以尊重环境和产品责任的方式行事

内部参考资料：

- 第三方行为准则，
- 气候战略。

## 产品监管

Safic-Alcan 致力于安全可靠地处理化学品。因此，产品监管对于管理集团分销给客户的化学产品对健康、安全和环境的影响至关重要。

通过将全面的健康、安全和环境（HS&E）实践与质量和法规管理实践相结合，Safic-Alcan 确保其产品得到负责任的处理，并遵守严格的安全和环境标准。集团的分包商和供应商也必须遵守其所在市场的安全和质量标准。

为了帮助客户了解安全使用化学品的最佳实践，降低事故和接触风险，Safic-Alcan 的员工从供应商处收集全面的信息，并为客户提供技术支持和有关安全处理、使用、储存和处置的明确信息。

通过遵循这些原则，集团在保护环境的同时，确保客户、员工和广大社区的安全和福祉。

## 环境

作为向配方产品行业分销特种化学品的主要企业，Safic-Alcan 公司非常重视环境管理，并致力于遵守适用于其行业的环境法规。

我们知道，维持安全和可持续的运营不仅会对我们的业务产生影响，还会对环境和个人产生影响。为了推动内部和外部变革，我们依靠创新合作，将其作为与利益相关方持续改进方法的一部分。

在此背景下，我们的目标是将可持续的环保最佳实践融入并推广到我们所有的运营业务和价值链中。

为此，我们致力于通过以下方式降低价值链的碳足迹：

- 提高我们员工意识和鼓励积极参与度；
- 遵守我们的气候战略，减少温室气体排放，以实现我们既定的减排目标
- 实施废物管理措施，最大限度地减少对环境的影响；
- 在可能的情况下，限制关注物质和高关注物质的分销；
- 确保负责任地使用能源；
- 与倡导环保和动物福利的供应商合作；

- 为打击砍伐森林做出贡献，并在适用情况下遵守《濒危野生动植物种国际贸易公约》和《名古屋议定书》等国际协定；
- 鼓励公平贸易倡议和负责任的耕作方式，确保尊重当地社区和土著人民的权利；
- 开发符合可持续发展目标的产品组合

所有员工都应积极参与和支持公司的环保举措，确保在 Safic-Alcan 公司运营的各个方面始终贯彻和坚持可持续发展的做法。





# 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.





# 保护财务诚信和资产

内部参考资料：

- 隐私政策、
- 社交媒体政策、
- 信息系统安全政策。

作为 Safic-Alcan 集团的成员，员工受托管理集团的财务资源和资产。保持财务诚信和保护集团资产对集团的长期成功和声誉至关重要。

每位员工都有责任确保财务交易透明、准确，并完全符合公司政策和法律要求。Safic-Alcan 公司员工还必须采取必要措施，防止企业资产、知识产权和机密信息被滥用、丢失或盗窃。

## 欺诈

保持准确的记录还有助于 Safic-Alcan 防止和发现欺诈行为。欺诈一般是指窃取自己无权得到的事物，或通过欺骗手段谋取利益。无论是在集团内部还是在所有对外交往中，都禁止欺诈行为。

欺诈行为具体包括

- 盗窃 Safic-Alcan 财产、
- 洗钱、
- 涉及货币交易的违规行为、
- 伪造费用报表、时间记录或任何其他公司记录、
- 挪用物资或任何其他公司资产。

欺诈还包括涉及供应商、客户或机构的任何违规行为或违规嫌疑。

## 准确的账簿和记录

Safic-Alcan 有责任为我们的利益相关者提供可靠的业绩表现。员工有责任确保其准备或维护的集团记录的完整性、全面性和准确性。

所有员工在履行职责时，不得故意向 Safic-Alcan 内部或外部的其他人（包括其独立审计师、政府监管机构和自律组织）歪曲事实，或导致他人歪曲有关集团的事实。

员工若有下列行为，将被视为歪曲事实

- 在 Safic-Alcan 或其任何子公司的财务报表或记录中制作、允许或指示他人制作重大虚假或误导性的记项、
- 未纠正重大虚假或误导性财务报表或记录、
- 签署或允许他人签署含有重大虚假或误导信息的文件、
- 对 Safic-Alcan 公司审计员的询问作出虚假答复或不予答复。

常务董事对公司向监管机构提交的文件和呈件以及有关公司一般业务、经营业绩、财务状况和前景的其他公开信息负责。

充分的监督包括妥善审查和批判性分析将要公开的材料，以确保其准确性和完整性（或在适当的情况下将这项任务委托给他人），并在适当的范围内咨询集团其他管理人员和员工，以期全面、公平、准确、及时和易于理解地披露信息。

在此过程中，每位常务董事都必须遵守所有适用法律、政府规章制度和会计准则的形式和精神。

## 信息保护

Safic-Alcan 公司制定了一系列集团规程和行动，确保每个人都了解并遵守数据保护、信息系统安全和保密指南，以防止任何入侵、黑客攻击或未经授权访问公司系统和数据的行为。员工必须遵守集团的指南。

### • 个人资料

Safic-Alcan 有责任维护每个人的隐私权。集团收集、存储和使用个人数据的方式是维护利益相关者信任的重要因素，其执行符合 2016 年 4 月 27 日颁布的（欧盟）2016/679 号条例（即 GDPR 条例）。

### • 商业秘密

商业秘密指具有商业价值并提供经济优势的信息，因为该信息不为相关业务领域内的人所普遍知晓或轻易获取，且合法控制该信息的人已做出合理努力对其进行保密（欧盟 2016/943 号指令）。商业机密受法律保护，未经授权的使用或披露可能导致制裁。因此，保护商业秘密是集团的重中之重。

商业秘密和其他机密信息必须受到保护，不得转交给未经授权的人员（也包括家人和朋友）。

在准备文件时，应考虑到任何书面文件和任何数据支持都可能在最坏的情况下落入竞争对手或法律对手的手中，并可能被用来进行不利于集团的行为。在起草文件（包括电子邮件）时应考虑到这一点。

### • 其他公司提供的机密信息

Safic-Alcan 公司的政策是不接受可能被视为机密、受限或限制披露的信息，除非经法务部门批准并由各方授权代表签署的书面协议，其中明确了各方的权利和义务。

### • 其他公司的信息

Safic-Alcan 不会为获取其他公司的商业秘密或其他机密信息而采取任何非法或不道德的行为。Safic-Alcan 公司绝不指望曾为竞争对手工作的员工泄露该公司的机密信息。





# 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.





# 发声：报告疑虑！

内部参考：

- 举报系统程序

针对具有挑战性的情况，通过提出问题和疑虑来保护 Safic-Alcan 的声誉。诚信意味着每个人在怀疑自己有问题或犯错误时坦率地说出来，并相互问责。

Safic-Alcan 鼓励开放的文化，员工可以提出自己的疑虑，表达自己的观点，捍卫自己的观点并指出不可接受的行为和要求。

## 寻求建议

当遇到可疑的商业行为或法律不确定性时，Safic-Alcan 集团的员工有权寻求指导。如果发现自己处于不知所措的境地，应该毫不犹豫地向直接主管寻求帮助。

## 报告违规行为

Safic-Alcan 鼓励负责任地报告任何潜在的违反守则行为。

所有员工都必须及时向当地管理层报告任何可能构成违反《准则》或法律的情况，因为及时报告对于防止伤害至关重要。

如果与当地管理层联系不合适，也可以通过以下举报渠道反映问题：

- 电子邮件: [reporting.concernes@safic-alcan.com](mailto:reporting.concernes@safic-alcan.com)
- 在线表格（匿名）：<https://forms.office.com/e/A2JcxqJsuX>
- 电话：+33 1 46 92 63 46
- 邮寄地址：13, Cours Valmy - Tour Pacific, 92977 Paris La Defense Cedex, France（法国）

## 调查

举报联系人是合规委员会成员，负责接收所有不当行为的举报。他们会认真、保密地对待所有此类报告。举报联系人的姓名可在“我的 Safic Global - 合规委员会”部分查看。

违规行为和潜在违规行为将酌情报告执行委员会。一个专门小组将在合规委员会的可能协助下调查所有报告。

如果执行委员会认定发生了重大违规行为，将通知集团监事会。否则，执行委员会将根据所有相关事实和情况，考虑是否应对违规行为采取纪律处分或预防措施，如果是，将采取其认为适当的措施。

违反本《准则》可能导致纪律处分，包括但不限于咨询、培训、停职或解雇。所有举报都将得到彻底调查，并采取适当行动。

### **禁止报复行为**

集团重视员工帮助执行委员会发现可能需要解决的任何潜在问题的努力。勇于发声永远是正确的做法。

一些国家的立法（如法国 2017 年 4 月 19 日颁布的《萨班第二法案》）为善意举报的员工提供法律保护。公司将为目前尚无此类法律的国家的员工提供同样的保护。

因此，公司不会对善意提请管理层注意问题的员工采取任何纪律处分或报复，即使调查确定没有发现违规行为。但是，如果发现员工蓄意提出虚假和恶意指控，公司将采取纪律处分。





# 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.concernesafic-alcan.com](mailto:reporting.concernesafic-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.



总部

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