



ADDEVMATERIALS

ETHICAL CHARTER





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Basic principles

We conduct our operations according to our principle TEAM, Enthusiasm, Autonomy and Motivation, but also with the T of Transparency and Trust which include sincerity and integrity. We insure on a day-to-day basis, to respect Human Rights and International Labor Laws, while following our CSR policy. We are committed to respect the legitimate interests of our internal and external stakeholders (collaborators, customers, suppliers, shareholders, local communities, public institutions). These principles and commitments apply to all ADDEV Materials operations, without distinction of geography or culture.

The entire ADDEV Materials direct stakeholders (collaborators and shareholders) review and commit to respect this ethical charter.

Law abiding

ADDEV Materials employees are required to be laws and standards abiding respectfully to the countries where we have operations.



Company's ethic

Collaborators

ADDEV Materials is attached to a pluralist working environment where trust and mutual respect are keys, also where everyone feels responsible of the performances and the image of the Group. Recruitment, employment and advancement of our teams are only acted on qualifications and skills required to fulfill the position. We are committed to ensure progress and development of qualifications and skills of our employees. We respect the dignity of individual and the right to unionize, as well the right of publicity/image. We make sure to maintain a good communication with our employees through in place information and consultation processes.

We are committed to ensure safe, secure and good working conditions to our employees. We do not use of forced or child labor. We refuse all type of violence and moral and/or physical discrimination. We respect International Labor Laws from the International Labor Organization and/or the law abiding in the operating country, if this one is more constraining.

Partners

ADDEV Materials commits to create mutually beneficial relations with its suppliers, customers and other partners. In all our transactions, we expect our partners to conform to the UN Global Compact. ADDEV Materials must be a trusted law-abiding company, and as a private entity, to assume its responsibilities within its entities and communities of operations.

Political financing

Political financing is subjected to the country's laws in effect. Even when legal, these participations can be susceptible to abuse and recognized as questionable practice. ADDEV Materials position is to refuse all contribution, financial or benefits in kind, to organizations or political parties, or to political figure. ADDEV Materials respects collaborators' right to dedicate their personal time to political or non-profit organizations. Their participation must stay personal, on their spare time and their own cost, as per the law.

Official letterhead, backgrounds and others ADDEV Materials' goods cannot be used for personal political activities. ADDEV Materials collaborators must clearly split their personal political activities with their mission in the company, to avoid conflict of interests.

Public authorities relations

ADDEV Materials shall promote and defend its legitimate professional interests. ADDEV Materials will cooperate with governments and other organizations, either directly, or through intermediaries' organizations, such as professional associations, to participate to laws and standards development potentially influencing its legitimate professional interests. Collaborators are free to take part in economic development or

closely linked organizations to ADDEV Materials ecosystem. Economic development is part of ADDEV Materials CSR policy.

Patronage and sponsoring

When ADDEV Materials commits to finance through patronage or sponsoring, the company commits to not defraud for illegal actions (e.g.: bribe). In order to ensure transparency to teams and public, the allocation funds can be released publicly after request to the direction.

Corporate Responsibility

Through continuous improvement of its corporate responsibility, ADDEV Materials is committed to align its growth to development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

The corporate responsibility is composed of 5 dimensions: Manage, Create value, Take care, Preserve, Act local.

In doing so, we set up the necessary processes and actions to align our business model to the Sustainable Development Goals, to climate objectives as stated in the Paris Agreement and the UN Global Compact.

Innovation

Our collaborative innovation framework aims at answering the industrial challenges from our customers, to optimize their performance through ensuring operators safety and products traceability. We carefully follow the development of economic models which are more inclusive and less waste intensive. We use a scientific approach, following strict standards for people, products and environmental safety.

Through creating a trustworthy and respectful environment within the company, we encourage the exchange of ideas and the conception of new solutions.

Through our engagement to act locally, we want to collaborate with startups with which we share values, such as innovation and social purpose. We favor agile management, using dialogue, consensus building and collaborative work.

We respect our customers' innovative projects confidentiality, using Non-Disclosure Agreement (NDA).

Business ethics

Corruption and influence peddling

ADDEV Materials and the directors follow a zero-tolerance policy when it comes to corruption and influence peddling.



Employees and directors must not offer or accept any gift, invitation, or payment which could be described as a type of passive or active corruption. They are advised to refuse immediately any request or offer of this type and to report it through the whistleblower mechanism.

Employees and directors must not use their position or their influence, to influence a decision taken by a third party. Equally, in a corruption situation, anyone can use the whistleblower mechanism to report a failure to comply this charter.

ADDEV Materials accounting documents and other related documents must precisely report on all nature of transactions operated. No accounts, no funds, no assets can be created and maintained if it is not clearly declared and registered.

ADDEV Materials shall have a specific attention to operations locations, to identify and secure potential high risk of corruption and influence peddling.

It is also part of everyone's responsibility to acknowledge risks related to its location activities, by using the corruption index from Transparency International (<https://www.transparency.org/cpi2018>).

Active corruption definition

Active corruption is the act from anyone at any time to offer or accept directly or indirectly, to a public agent (person in a position of public authority, public service or public company) or a private agent (private company or association), gifts, promises, donation, for him/her or for someone else, so as to fulfill or not (or for fulfilling or not) a deed related to his/her function, mission or mandate, or facilitated by function, mission or mandate.

Influence peddling definition

Influence peddling refers to a person making money out of his/her position or influence, proved or supposed, to influence a decision which will be taken by a third party. It involves

three agents: beneficiary (the one providing advantages or donation), intermediary (the one using his/her credibility given by his/her position) and the person who hold the decision power (authority, public administration, justice representant, etc.). In this case, all agents can be sanctioned by law.

Competition

ADDEV MATERIALS believe in strong, fair competition and support development of compatible legislation. ADDEV Materials and its collaborators must respect fair competition principles and all the laws related.

Conflict of interests

ADDEV Materials collaborators shall avoid having personal activities and financial interests potentially clashing with professional responsibilities. ADDEV Materials



employees shall not use their position to get advantages for themselves or someone else.

Confidentiality

Disclosure of confidential, non-authorized information is strictly prohibited and can cause harm to ADDEV Materials. ADDEV Materials internal stakeholders commit to ensure that all non-public information, stay strictly confidential. Employees with access to confidential information related to our collaborators or business partners have the obligation to protect them from being disclosed.

We respect and commit to not disclose or sell, customers personal data, to external parties. For this, we work to deploy and apply across our operation the necessary general data protection framework according to local law.

Whistleblower mechanism

In line with its commitments, ADDEV Materials provide a whistleblower mechanism, in case of failure to respect to one or several ethical principles mentioned in this charter, as for example for corruption or harassment. Anyone can report a failure to respect to his/her supervisor. If no response is given in a reasonable period, or in specific case, the alert can be sent directly to the Group Director and/or to the Human Resources Director. Anonymity and/or confidentiality will be guaranteed. To this end, the alert can be sent from an anonymous email address (<https://www.arobase.org/gratuit/annuaire-messengeries.htm>), from an outside of ADDEV Materials' sites internet, or by a postal letter without mentioning the sender's name. Furthermore, the whistleblower will not face retaliations for a report made in good faith. People retaliating against whistleblowers will be systematically sanctioned.

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This communication channels can also be used whenever facing a doubt or question related to ethics.

☐ Tick the box, if you work in procurements/sales/merge&acquisition/top management. You commit to follow the e-learning "Doing business without bribery" (<http://www.doingbusinesswithoutbribery.com/>)

☐ I acknowledged the corruption index related to the countries where I operate and/or where I have business relations (<https://www.transparency.org/cpi2018>)

Read and signed Date:....., Location:

FULL NAME

SIGNATURE