



Code of Ethics

ALBIOMA
FRENCH LIMITED COMPANY (SOCIÉTÉ ANONYME) WITH SHARE
CAPITAL OF €1,205,840.52
TOUR OPUS 12
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ALBIOMA

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About the Albioma Code of Ethics

This document sets out a series of rules and values that form the basis for responsible business conduct. Going beyond the principles, the Code of Ethics underlies the Group's strong commitment to promoting an exemplary corporate culture.

The Code of Ethics applies to all Group personnel, whether they are employees or company officers, in all countries in which the Group operates and at all companies that it controls. It is also intended to be promoted among all the Group's external service providers, which must share our core values.

The Code of Ethics cannot cover every eventuality. It is intended to help users with their decision-making and as a guide to best behaviour for all users. In this respect, it in no ways supersedes or conflicts with laws or regulations applicable to the Group or its articles of association. Conversely, the Code of Ethics is intended to apply where laws, regulations and the articles of association are silent.

Nor is it intended to be a comprehensive collection of all the internal rules applicable within the Group. Indeed, it does not supersede internal procedures in place within the Group or within each entity. Accordingly, certain rules, articulated as principles in the Code of Ethics, are in practice implemented via more detailed procedures that must be followed.

Ethics affects everyone. Whilst it is the responsibility of the management teams to ensure that the Code of Ethics is applied, to promote the values it embodies and to monitor compliance with the rules, it is also the responsibility of each Group employee to ensure that they act ethically at all times!

1. Compliance with the law and our legal obligations

1.1. Complying with the laws and regulations governing our activities

Compliance with the law is the basis of responsible behaviour. All employees must ensure that, at all times and in all circumstances, their actions on the Group's behalf comply with applicable laws and regulations. These laws and regulations may differ from one country to the next and are often complex. Any breach of applicable laws and regulations, regardless of whether it is deliberate, may result in civil or criminal sanctions being imposed on the Group and its managers.

1.2. Meeting our contractual commitments in good faith

Above and beyond complying with laws and regulations, all employees must ensure that the Group complies with its contractual commitments.

The Group must also honour its contractual commitments in good faith, honestly and transparently. This commitment also applies where the Group decides to terminate contractual relationships, whether or not such termination is attributable to its contractual partner.

2. *Making people our foremost priority*

2.1. Ensuring employee safety

The safety of all Group employees and all third-party workers in its facilities is paramount to Albioma, regardless of the role they are carrying out or the job they are doing or where they are working.

This basic principle is implemented first and foremost by sharing a strong safety culture built around ensuring that each individual employee is aware of the importance of their role in and personal responsibility for ensuring their own safety as well as that of their colleagues and the safety of the company's property and activities.

This safety culture must be applied throughout the value chain underpinning the Group's operations, from the design and construction of investments up to subsequent operation.

2.2. Combating all forms of discrimination, harassment and violations of human dignity

Albioma has made combating all forms of discrimination a top priority. In this respect, the Group utterly condemns all forms of discrimination, whether based on origin, beliefs, gender, age, sexual orientation or disability, affecting any employee or company officer or any applicant for any such positions, or its partners, clients or suppliers.

Albioma moreover condemns any violation of human dignity including child labour and slavery.

The Group also undertakes to respect the right to privacy of all employees and, more broadly, of everyone working for the Group. Personal data may only be retained subject to the strict limits established by applicable laws and regulations, and only for the purposes provided for therein.

3. *Operating with integrity and transparency*

The Group's success is primarily built on its manufacturing excellence and its capabilities. Albioma rejects any practice the object or effect of which is to distort the normal course of business or competition. Such practices, which are very often subject to criminal sanctions, may expose the Group to serious risks and seriously damage its image and reputation.

In addition, everyone is responsible for protecting the Group's image and, more broadly, all its assets.

3.1. Compliance with competition rules

It is essential that the rules designed to ensure free and open competition are complied with at all times. Albioma thus forbids any anti-competitive behaviour involving its clients and suppliers, and forbids any practice designed, in coordination with third parties, to distort free and open competition.

3.2. Combating all forms of bribery

3.2.1. Rejecting bribery and influence peddling

Albioma utterly condemns all forms of bribery.

Bribery is the result of the combined actions of a briber and a bribee. It covers two types of situations, depending on whether you look at bribery from the perspective of the briber or bribee:

- situations in which a person, the briber, offers or promises to offer some financial or non-financial advantage to another person, the bribee, with a view to inducing the latter to act in a manner that is contrary to his or her duties (making a decision, refraining from acting, etc.) thereby providing some advantage to the briber; the actions of the briber, consisting of offering an advantage, are classified as active corruption;
- situations in which a person, the bribee, asks another person, the briber, for some financial or non-financial advantage, or agrees to accept such an advantage from the latter to act in a manner that is contrary to his or her duties (making a decision, refraining from acting, etc.) thereby providing some advantage to the briber; the actions of the bribee, consisting of requesting an advantage or agreeing to accept such an advantage, are classified as passive corruption;

Bribery is subject to very significant criminal penalties. Sentences are increased where the bribee is a person in a position of public authority or bestowed with a public function or is a public elected official. This is classified as public bribery as opposed to private bribery.

Influence peddling is a form of bribery in which the bribee, in return for an advantage provided by the briber, or promised by the latter, uses his/her influence to convince an authority or public agency to make a decision that is favourable to the briber. From a criminal perspective, influence peddling is subject to significant criminal penalties, with any sentences being once again increased where the bribee is a person in a position of public authority or bestowed with a public function or is a public elected official.

Group employees are strictly forbidden from engaging in any form of bribery or influence peddling, whether offering advantages to obtain preferential treatment or accepting such advantages to grant preferential treatment.

All Group employees must comply with Group rules on combating bribery and influence peddling, and report any acts (including any solicitation) that may constitute bribery or influence peddling to the Compliance and Ethics Officer.

3.2.2. Rules on business gifts

These rules prohibit in principle the giving or receipt, in the Group's name and on its behalf, of gifts or any other form of payment or advantage, including the exceptional payment of expenses that are not directly related to business activities.

Ordinary gifts with a value that is nominal or low in view of the circumstances, are nevertheless acceptable, except where the effect of such gifts is to create doubts as to the impartiality of the giver or recipient.

Gifts that breach these criteria may only be given or accepted where the matter is first referred to the Compliance and Ethics Officer, who can review all the circumstances and approve the gift.

3.2.3. Rules governing sponsorship and patronage

The Group is involved in sponsorship deals at various levels and may become a patron of public or private charitable endeavours.

Such arrangements must be kept within the strict confines of the internal rules governing sponsorship and gifts and must, without fail, be approved by the Corporate Social Responsibility Department which shall ensure, in tandem with the Compliance and Ethics Officer where necessary, that they involve no form of preferential treatment or conflict of interest, that they reflect the Group's values and that the Group's contribution is commensurate with the purpose.

3.3. Preventing conflicts of interest

All Group employees are subject to a duty of loyalty. They must not therefore directly or indirectly engage in any activity that would create a conflict of interest with the Group. A conflict of interest exists when the interests of an employee, whether personal or otherwise, conflict with the Group's interests. Such a situation may influence the behaviour of the employee in question in a way that is contrary to the Group's interests.

In this respect, Group employees must not take a direct or indirect interest in a client, supplier or competitor of the Group. Employees must also notify their line manager or the Group's Compliance and Ethics Officer whenever the Group is proposing to enter into a transaction with a counterparty in which s/he or a family member directly or indirectly holds some interest.

In general, any known or potential conflict of interest must be immediately reported to the employee's line manager or to the Group's Compliance and Ethics Officer.

3.4. Promoting transparency

Transparency is an essential Group value. In addition to being entrusted with a public service role, the Group is also listed on a regulated market in France. Albioma encourages a real culture of transparency, both in dealings between Group employees and in its dealings with stakeholders.

The Group specifically places great importance on the quality of the information, in particular the financial information, it releases to the market. It relies on accurate financial statements that give a true and fair view of the Group's position. It is thus essential that all employees pay close attention to the reliability and accuracy of the information they share within the Group, and ensure that it is exhaustive. For the same reasons, all transactions by the Group must, without exception, be recognised in its financial statements at the appropriate time in line with the accounting standards applied by the Group. Albioma utterly prohibits any practice the object or effect of which is to misrepresent the Group's financial statements.

3.5. Compliance with internal control mechanisms and combating all forms of fraud

The Group has established a certain number of internal control mechanisms, enabling it to obtain reasonable assurance as to the compliance of its activities, their effectiveness and, more broadly, the level of risk they may pose. Failure to comply, even inadvertently, with internal control mechanisms severely hampers the Group's ability to manage the risks to which it is exposed.

Fraud, which consists of deliberately circumventing the Group's internal control mechanisms to obtain a personal advantage or to provide a third-party with such an advantage, is utterly prohibited by the Group, and disciplinary proceedings will be brought against any employee who engages therein.

The internal audit function is key to the proper functioning of the internal control mechanisms: it ensures the effectiveness of existing internal control systems and, where necessary, makes recommendations on their improvement or on the introduction of new systems. The internal audit function may also become involved in the event of a proven breach of an existing internal control system, and particularly in the event of fraud.

Cooperation with the internal audit function must meet the strictest transparency requirements, in particular in the course of audit assignments or investigations undertaken by the internal audit function. Hindering such assignments or investigations, including by concealing or falsifying information in the course thereof, is strictly forbidden.

3.6. Compliance with the rules governing trading in Albioma's shares

As a company listed on Euronext Paris, a regulated stock exchange, any direct or indirect trading in Albioma's shares must comply with specific laws designed to combat insider dealing and related offences.

Within the Group, all employees must comply with internal procedures governing market ethics. In particular, Group employees in possession of confidential information must proceed with caution when considering buying or selling Albioma's shares. Such information, were it likely to materially influence the share price, could be considered "inside information": any trading in Albioma's shares is thus forbidden until such information is officially released by the Group in the form of a press release. The disclosure of such information to employees or third parties who were not previously aware of it, or encouraging Group employees or third parties to trade in Albioma's shares based on this information must also be prohibited.

Any such behaviour may be sanctioned administratively, through fines that may be significant, or by the courts.

In the event of any doubt, Group employees who wish to trade in Albioma's shares are encouraged to first seek the advice of the Compliance and Ethics Officer.

3.7. Protecting the Group's positive image

The Group's image is the combined result of its visual identity, its manufacturing and commercial successes, its response to any challenges it faces and its communications. It is also dependent on how the Group is viewed from the outside.

In this respect, all employees must help to protect the Group's positive image. This means above all endeavouring to preserve its reputation, by refraining from any making criticism of the Group, its activities or employees, either orally, or via the media (including social media), and also endeavouring to protect its visual identity.

Albioma respects the right of every employee to take part in public, political or religious activities in a personal capacity. Group employees must not, however, involve the Group in those activities or imply that they are acting in the Group's name or on its behalf or with its support.

Speaking publicly in the Group's name is a serious act: only employees who are expressly authorised to speak in its name and on its behalf, either on a permanent basis or on a particular occasion, may do so. In general, any statement in the Group's name and on its behalf must be prepared and must comply with relevant internal procedures.

3.8. Protecting the Group's assets

All employees must ensure that the Group's assets are properly used and protected. Assets not only refer to physical assets like industrial equipment or IT equipment provided to the Group's employees, but also intangible assets such as trademarks, patents, know-how and, more generally, the data held on the Group's IT systems.

The Group's assets must be used for their intended purpose: they must not, except in the exceptional scenarios described in applicable internal procedures, be used for personal purposes. Personal use of the Group's IT and telecommunications equipment must be kept within reasonable limits, which are justified by the need for a work-life balance.

Broadly speaking, the Group utterly condemns all forms of theft and damage to the Group's assets.

All employees must treat any equipment provided to them in the same way as they would their own equipment and, in particular, take reasonable steps to prevent it from being lost, stolen or damaged.

All Group employees must also comply with the duty of confidentiality imposed by their employment contract, their service agreement or, as the case may be, the circumstances. All persons in possession of financial, strategic, industrial or commercial information are subject to a strict duty of confidentiality. All employees must also use every effort to protect the physical or electronic media on which such information is stored.

4. *Applying the Code of Ethics*

4.1. The Code of Ethics: a guide to best behaviour

The entire management team is responsible for implementing and enforcing the Code of Ethics. In particular, each local manager must ensure that their teams properly understand the values and principles in the Code of Ethics and must help to disseminate them at all levels. In tandem with local managers, the Group arranges awareness-raising and training initiatives on various matters relating to the Code of Ethics and ethics more broadly.

All employees will be provided with a copy of the Code of Ethics and must familiarise themselves with its contents. It is also systematically sent to all new employees along with their onboarding package.

The Code of Ethics is above all a guide to best behaviour for all Group employees. Before making any decision, employees must, in good conscience, ask themselves whether the actions they are planning are in line with the principles set out in the Code of Ethics, above and beyond merely being in compliance with applicable laws and regulations.

In the event of any doubt regarding the interpretation or understanding of the Code of Ethics, or simply to ensure that a proposed action complies with the principles set out herein, employees are encouraged to speak to their line manager in the first instance.

Should doubts remain or the circumstances so require, all employees may contact the Group's Compliance and Ethics Officer by sending an email to the following dedicated email address: compliance@albioma.com.

4.2. Reporting breaches

All Group employees may report breaches of any of the principles set out in the Code of Ethics. The breaches may be reported in three ways:

- to the line manager, who will inform the Compliance and Ethics Officer;
- directly to the Compliance and Ethics Officer using the dedicated email address: compliance@albioma.com;
- by submitting a report via the internal whistleblowing system <https://albioma.integrityline.com/>. The Integrity Line platform is a third-party whistleblowing system, which is linked neither to Albioma's website nor its IT networks. The information shared is wholly encrypted and can only be accessed by the Compliance and Ethics Officer. If the whistleblower so wishes, and insofar as permitted under applicable local laws, the report may be made wholly anonymously.

Regardless of how the report is submitted, any report of a breach must be made in good faith and without any intention to cause harm. For reports to be reviewed and action to be taken to end the breach and, as the case may be, disciplinary proceedings brought, reports must be based on verifiable facts and must be adequately substantiated.

Provided the report meets the above conditions and complies with the procedure in place, the whistleblower is protected, with their identity kept confidential and protection provided against any side-lining, sanctions, reclassification or reassignment, discrimination or firing as a result of the report.

4.3. Compliance and Ethics Officer

The Group's Compliance and Ethics Officer is specifically responsible for disseminating and monitoring the application of the Group's Code of Ethics. S/he arranges communication and training initiatives to help properly disseminate and instil the principles and values set out in the Code of Ethics.

The Compliance and Ethics Officer is also responsible for answering any queries regarding the interpretation of the Code of Ethics. S/he advises all Group employees on the compatibility of their actions with the principles and values set out in the Code of Ethics.

Finally, the Compliance and Ethics Officer is sent reports of known or potential breaches of the Code of Ethics. In this respect, the Compliance and Ethics Officer is tasked with taking the necessary steps to review the breach.

Where s/he is sent a report on a known or potential breach of the Code of Ethics, the Compliance and Ethics Officer has the option, calling on whatever support s/he feels is necessary in the circumstances, to carry out interviews or arrange for them to be carried out by others, to undertake an internal investigation and, if the reported breach is criminal in nature, to involve the relevant police departments.

The Compliance and Ethics Officer reports on his/her work to the Corporate Social Responsibility Committee and may, should s/he so wish, ask for its recommendations before taking action.