

TEAM SPIRIT. INDEPENDENCE.
BOLDNESS. PASSION. CUSTOMER SERVICE .



ETHICAL CHARTER

Nadia Group and its companies

PREAMBLE

This charter is an official document that allows Nadia Group to affirm its values and best practices and to establish rules of good conduct shared by all its employees and partners.

It formalizes a set of guidelines and actions that go beyond the legal obligations of companies.

Through this document, each subsidiary of the Group commits its employees, regardless of their role, to respect each principle, related to ethical as well as environmental and social concerns.

This charter, intended for wide dissemination, is a pledge of responsibility and trust towards customers, employees, suppliers, and financial partners alike.

Furthermore, this document provides employees with tools to deal with certain situations and act in line with the principles and values of Nadia Group. It answers the question: “ In this situation, how should I act to align with the rules and values upheld by my employer?”

This charter is part of the CSR (Corporate Social Responsibility) strategy implemented by Nadia Group, aiming to be an ethical and responsible company. Therefore, Nadia Group relies on the voluntary and positive commitment of all its employees and partners to apply the values and principles outlined in this document.

This ethical charter has been effective since 15/07/2022



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THE GROUP'S MISSIONS AND VALUES

OUR PURPOSE

“ Bringing together and developing diversified industrial expertise based on innovation to serve our customers while respecting our environment.

”

OUR VALUES

Being bold

Taking on challenges, questioning ourselves and being open to new ideas - that's the Group's DNA. We have a constant desire to undertake, innovate and invest.

Acting with passion

Our group was born in the hands of passionate people. Each of us is driven by a passion for our products and a desire to progress.

Cultivating our team spirit

To succeed on a day-to-day basis, we focus on teamwork and talent development. We act with simplicity and kindness to encourage exchanges within the group.

Asserting our independence

Our independence means that we are free to make our own decisions and ensure the long-term future of the Group through the operational performance of our businesses.

Thinking customer

Our customers are at the heart of our organisations. We constantly strive to exceed their expectations through the pursuit of excellence.

A CSR POLICY AT THE HEART OF THE COMPANY

Anchored in a culture of French design and manufacture, the Nadia Group is committed to a CSR policy with its stakeholders, with the primary objective of respecting people and their environment.

Our commitments to a sustainable future can be broken down into 4 areas:

- Offering sustainable products;
- Tending towards activities that have less impact on the environment;
- Being a responsible employer, by creating an environment conducive to the well-being and development of each employee;
- To be a company of integrity and good corporate citizenship.



SCOPE OF THE CHARTER

The principles set out in this charter apply to:

- All employees, subsidiaries and establishments of the Nadia Group:

All Group employees (whether permanent or occasional), whatever their hierarchical level or profession, are expected to act in accordance with the Group's ethical principles in all circumstances.

A healthy working environment is essential to the smooth running of the Group and the fulfilment of its employees. Respect, trust and dialogue must guide relations between everyone.

- To the Group's stakeholders:

The Group promotes and applies these ethical principles to its relations with all partners and persons with whom it is associated on the market, whether they be customers, suppliers, investors, auditors, consultants, service providers, subcontractors or other intermediaries representing one of its companies, within the framework of a contractual relationship.

It attaches the utmost importance to customer satisfaction through open dialogue and is committed to the quality of its products and services and the transparency of its procedures.

It ensures the integrity of its partners, suppliers, service providers and subcontractors, the compatibility of their ethical concerns with its own, and informs them of this Charter.

- Vis-à-vis society as a whole :

Overall, the Group ensures that its ethical principles are applied in all circumstances, wherever it is involved, with respect for human rights, the environment and cultural diversity.

This charter can be consulted both internally and externally.

It can be accessed at any time on the Group's intranet and its content is communicated to all employees and partners.

It is also posted on the Group's websites and those of its subsidiaries, and can be obtained on request from your personal contact.

This Charter is subject to development in line with changes in legislation, regulations and the Group's activities.

HOW IS THIS CHARTER USED?

Because of the diversity of its activities, locations and relationships, the Nadia Group is subject to numerous laws and regulations, compliance with which is essential.

Through this charter, the Group wishes to offer food for thought and benchmarks, and to reiterate that the principles of integrity and fairness must guide everyone's decision-making and conduct, while respecting regulations and those around them.

Nevertheless, this charter is not intended to restate or replace the various applicable texts (laws, procedures and instructions, articles of association and internal regulations) which govern the affairs of the Group's various subsidiaries, their employees and their partners.

Similarly, it cannot be applied uniformly to all situations that these parties may encounter in the course of their activities.

HOW CAN WE SET AN EXAMPLE?

In addition to our day-to-day behaviour, which must be exemplary both in relation to the Group and to our environment, small, simple gestures can help to demonstrate the importance of the Group's ethical approach.

For example

- Knowing where to obtain a copy of the Code of Ethics if necessary;
- Present the Code of Ethics to all new employees and partners and remind them of its contents from time to time;
- Encouraging the application of the principles of the Code of Ethics and not encouraging others to depart from them.
- Base decisions on fundamental questions:
 - Is it legal?
 - Does it comply with the Group's values, ethical principles and CSR policy?
 - Will this action (or inaction) have any consequences?
 - How could this decision be justified within the Group or externally if necessary?
- Regularly reflect on the ethical dilemmas that may arise in your business.

WHO SHOULD I CONTACT IF I HAVE ANY QUESTIONS ABOUT THIS CHARTER?

Any employee or partner who has questions at any time can raise them with their line manager, their main contact or the Legal department.

In the event of any action or behaviour that appears to be in conflict with our Charter, we invite you to report it in the first instance to :

- The management of the Group subsidiary that would be affected, or a local hierarchical representative,
- The Nadia Group Human Resources Department, for human resources concerns,
- The Nadia Group's General Management, for malfunctions that could undermine the Group's values and image.

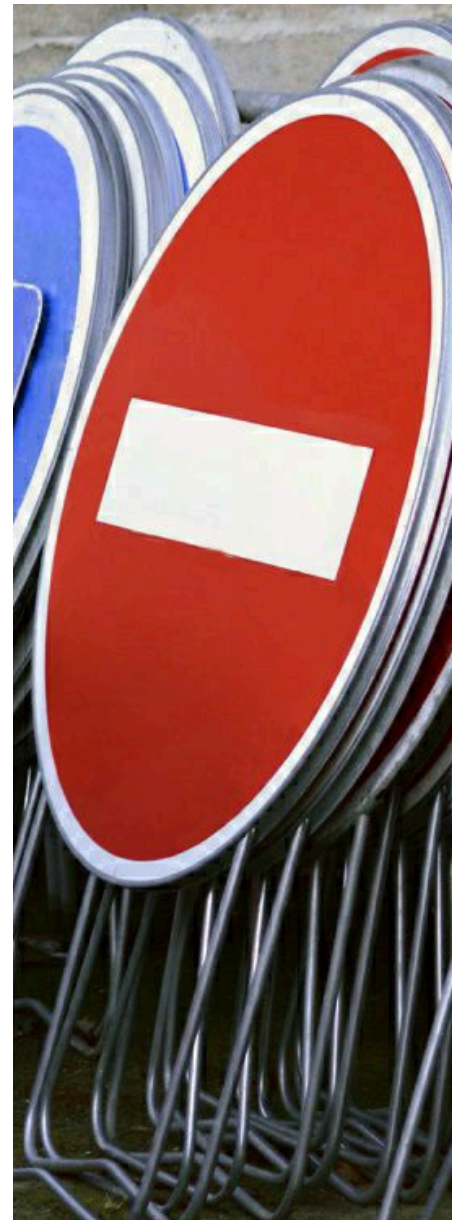
PENALTIES

Failure to comply with the applicable regulations or with this Code of Ethics, and the CSR policy from which it stems, may have serious consequences for the Group (economic, image or reputational damage) but also, on an individual basis, for any employee concerned.

A breach of these principles may lead to :

- The application of disciplinary sanctions (up to and including dismissal), civil sanctions (damages, etc.) and criminal sanctions (fines, convictions, etc.) against the employee or partner responsible for the misconduct;
- The termination of any business relationship with a partner whose actions are not in line with the Group's values and principles.

It should be noted that any person acting in good faith who has reported a situation of concern will not be subject to any sanction. Furthermore, the Group will firmly condemn any form of reprisal against such a person.



THE GROUP'S ETHICAL PRINCIPLES

These principles represent a moral obligation in the service of humanity and equal treatment, and determine the way in which the Group and its subsidiaries act within the community made up of all employees, as well as all external partners and customers.

RESPECT FOR PEOPLE AND THE ENVIRONMENT

Each party undertakes to :

- Ensure compliance with health and safety rules and continuously optimise working conditions.
- Respect work tools and any equipment provided.
- Respect other people's differences (opinions, expressions, beliefs, orientations) and combat all forms of discrimination (verbal or physical, etc.) and harassment (moral or sexual).
- Ensuring that its inclusion policy is applied in a way that meets the social and regional challenges and helps to integrate people who are far from employment.
- Maintain a dialogue based on listening, benevolence, tolerance, team cohesion, transparency and mutual support.
- Ensure the professional fulfilment of each individual through the development of skills and the valuing of work.
- To treat everyone fairly and be impartial in all circumstances.
- Protect the information and personal data of employees and anyone working for or in relation with the Group in compliance with the European General Data Protection Regulation (GDPR) and its 7 general principles.
- Guarantee legal protection for all employees in the context of their duties.
- Ensure that the environmental rules in force are properly applied.
- Take into account the impact of each company decision on the future of the planet.

RESPECT FOR VALUES

Each party undertakes to :

- Acting as an ambassador for the company's project and values on a day-to-day basis and within its sphere of influence, and ensuring that the company's image is conveyed externally.
- To be involved in the company's continuous improvement process, feeding back expectations and feedback from internal and external stakeholders in order to respond to the changing needs of everyone involved.
- Demonstrate integrity (honest, non-corruptible behaviour) and protect the confidentiality of non-public information, sensitive confidential exchanges and the content of contracts signed between companies and their partners.
- Refrain from using the Group's resources for illicit purposes or purposes that could harm the interests of companies, individuals or partners.
- Prohibit the illegal enrichment of others to the detriment of companies and their stakeholders.
- Always act in the best interests of the company by avoiding any decision that could lead to a conflict of interest (relational, financial, commercial or secondary activity).



BUSINESS MANAGEMENT

Each party undertakes to :

- To ensure that we provide fair and clear information in our statements to partners about our business or the products and services we offer, never making false or misleading statements.
- Respect the rules of open and fair competition by avoiding any denigration of competing products and services and by using information about the company concerned honestly.
- To manage its activities, its relationships and the data exchanged in a spirit of mutual trust and respect, with a view to treating everyone with dignity and fairness and in accordance with the legislation in force.
- Refrain from receiving personal benefits (all forms of bribery and corruption) in the context of a relationship with an external partner.
- Not to offer or receive anything of value that could influence the company or a third party in its decision.

In general, gifts of modest value (< €100 excluding VAT) that are not concealed or solicited are considered acceptable, as long as they are not given with a view to influencing conduct or judgement.

Examples of 'acceptable' gifts: advertising items or goodies, occasional reasonable business lunches, foodstuffs that can be shared at festive times.

If purchasing for a third party, please give preference to sustainable, responsible and local suppliers.

'Rejected' (except in special cases): cash or cash equivalents (including cards, boxes or vouchers), gifts of excessive value, etc.

- Be vigilant about the risks of fraud, money laundering and corruption.
- Comply with expenditure and reimbursement procedures and do not falsify or misappropriate a receipt in order to conceal an inappropriate act.
- Report any behaviour by a partner, supplier or employee that conflicts with our values, CSR policy and this charter.

Each of the parties mentioned above undertakes to respect the commitments listed above and to promote and apply the ethics charter on a daily basis.



Eric DE PONTBRIAND
Chairman of Nadia Group

Pascal CHERBONNIER
Chief Executive Officer of Nadia Group

Reynald VANDENBUSSCHE
Chief Executive Officer of Nadia Group

Lydie PRUDHOMME
Head of Human Resources

Laurence BONNEAU
HSE / CSR Manager

Group subsidiary
(stamp and signature)



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