

**CODE OF ETHICS**  
**ATELIERS DE FRANCE GROUP**  
**(January 2024)**

# OUR CODE OF ETHICS

The Ateliers De France Group is built on strong values, solid ethical principles and absolute compliance with regulations.

The Ateliers De France Group is constantly growing and it must set clear written rules to ensure that everyone can adhere to them and become its own ambassador for these principles and their perfect implementation.

The Code of Ethics fulfils this role and formalizes the main rules of ethics, probity and integrity that all our employees, service providers and suppliers undertake to respect. It defines the authorized behaviors and those prohibited within the framework of each decision that employees and managers of our Group are required to make on a daily basis.

These rules have been drawn up jointly by the entire Group management team, which is its primary guarantor.

This Code of Ethic was drafted on the basis of the key founding principles of the Group and its subsidiaries, namely autonomy, commitment and excellence, which guide the individual behaviors of its employees at work, encourage collective performance and give meaning to the Group's raison d'être:

“Restoring the historical heritage and carrying out the exceptional projects from today and tomorrow, using noble and sustainable materials, by perpetuating, from generation to the next, the excellent know-how.”

The choices we make individually and collectively, define us and testify to the consideration of our principles and values. Ethics guide us and help us to answer the important questions about how we act.

**Antoine Courtois**  
President

## To whom does the Code of Ethics apply?

This Code applies to all Ateliers De France Group employees worldwide, i.e. to all permanent and temporary employees, and regardless to their hierarchical level.

Employee buy-in is based on the respect and the embodiment by the management of the Group's values and culture. The Group's managers, all signatories of the commitment to comply with the Code of Ethics, have a duty to set an example and a responsibility to promote the values and commitments of this Code among their employees and to ensure its implementation. They shall carry out the internal controls necessary to verify compliance with the Code and take measures where necessary.

This Code, which is systematically communicated to new employees when they are hired, is available on the Group's website for everyone to refer to.

The principles contained in this Code are also intended to apply to all the Group's partners, in particular customers, subcontractors, service providers and suppliers, in the context of their contractual relations with the Group and its subsidiaries.

## How is the Code of Ethics used?

The principles of integrity, probity and fairness must govern the conduct of everyone, without prejudice to local laws and regulations. Each employee must therefore demonstrate vigilance, reflection, common sense and judgement.

This Code is not intended to restate or supplement all the laws and regulations, agreements or internal standards governing the activities of the Group's various entities and their employees. Nor can it address all the situations that managers or employees may face in the course of their activities.

The purpose of this Code is not to provide an exhaustive list of the behavior to be adopted in each situation, but to provide guidelines and a remind people of the spirit that must govern each decision.

The Group urges all employees to examine and react to these situations with integrity, in accordance with the principles set out in the Code of Ethics, and with their discernment.

The Code of Ethics is also supplemented by the Code of Conduct, inserted where appropriate and in accordance with the applicable regulations in each internal regulation of the Group and its subsidiaries, allowing the implementation of preventive measures in response to each corruption risk identified in their risk mapping.

# Our ethics as an employer

## A. Respect for people

The Group complies with all internationally recognized rules set out in the fundamental texts and and human rights standards. These are internationally recognising and ensuring respect for Human Rights, in particular the International Bill of Human Rights (composed by the 1948 Universal Declaration of Human Rights and its two International Covenants: the International Covenant and Economic Social and Cultural Rights (ICESCR) and the International Covenant an Civil and Political Rights (ICCPR)), the 2011 United Nations Guiding Principles on Business and Human Rights, the Fundamental Conventions of the International Labour Organisation (ILO) and the 1950 European Convention on Human Rights.

As such, the Group, its subsidiaries and all its employees are committed to respect human rights, in particular the right not to employ children in condition contrary to ILO Conventions 138 and 182 and their recommendations, and not to use any form of forced labor. The Group ensures that all its employees respect these rights and asks its partners to have the same high standards.



the Group is committed to employee development (training, promotion and opportunities), promote gender diversity, diversity of career paths and profiles and guarantee fair treatment for all.



Ensuring equal opportunities for all and non-discrimination on grounds of real or supposed origin, sexual orientation, age, gender, state of health, political or religious beliefs, trade union membership or disability.



Commit to respect the right to human dignity, which is a fundamental principle in the way we work. Any conduct or action that may violate this right, and in particular any form of harassment, is unacceptable.



Respect the privacy of employees, partners and third parties by gathering (in a manner that is transparent, lawful and proportionate) and retaining only the personal data necessary for its activities for a period adapted to the purposes of each processing and regulatory obligations. Uphold political and/or religious principles.

## B. Compliance with health and safety rules

The health, safety, well-being and security of every individual are our priorities. We take care to protect the physical and mental health of our employees.

Workplace safety I about all of us.

The Group, its subsidiaries and all its employees are committed to:



Respect and enforce applicable safety rules, and in particular the working conditions and well-being of all persons present on Group sites. Take all reasonable precautions to maintain a safe and healthy working environment.



Train employees on appropriate behavior in the event of an emergency and on compliance with applicable health, hygiene and safety procedures.

# Our ethics as a company

## A. Integrity and fairness of commercial practices

The Group attaches paramount importance to rigorous compliance with laws and regulations, particularly in the fight against corruption and influence peddling, money laundering and the financing of terrorism, and the prevention of conflicts of interest.

Each Group employee complies with the laws and regulations of the country in which they work and shall ensure that he/she is aware of the relevant provisions governing his/her activity.

As such, the Group, its subsidiaries and all its employees are committed to



Prohibit all practices of corruption and influence peddling: The negotiation and execution of contracts must not give rise to behavior or facts that could be classified as active or passive corruption, or as complicity in trading in influence or favoritism. These criminal acts are subject to zero tolerance within the Group.



Prevent conflicts of interest: In the professional context, employees must act at all times in the interests of the Group and ensure that they do not place themselves directly or indirectly in a situation of conflict of interest. They must inform their superiors of any potential or actual conflicts of interest they may encounter.



Prohibit all anti-competitive practices: cartel, abuse of a dominant position, abuse of economic dependence, etc. Each employee is expected to refrain from any conduct having the object or effect of preventing, restricting or distorting free competition on the markets.



Establish a privileged relationship with its partners, suppliers and subcontractors, which implies that the latter agree to apply all the Group's health, safety and human rights rules to their own employees. The Group has a Suppliers' Charter that fosters a long-term relationship of trust.



Ensuring the proper use and protection of the Group's assets and resources, which must remain exclusively for professional use, and thus combat the abuse of social assets.



Guaranteeing the accuracy and reliability of accounting and financial data, information and indicators; To guarantee the accuracy of the information required to carry out each person's duties, and ensuring that it is properly communicated,

These principles are supplemented by the internal Code of Conduct.

## B. Respect for the environment

Aware of our individual and collective responsibility to protect the planet, the Group, its subsidiaries and all its employees are committed to :



Respect the environment and strive to minimize its ecological impact by ensuring that it maintains the best standards in terms of environmental protection and keeps pace within the state of the art in force.



Developing activities that contribute to the use of low-carbon energy and the protection of our natural heritage.

## Duty to inform

Employees have a duty to inform their direct or indirect superiors as quickly as possible of any breaches of the Group's Code of Ethics, or to use the internal whistleblowing system provided for this purpose by following the procedure detailed in the section below entitled "How do I report a critical situation or ethical malfunction?".

## Decision-making guide

If an employee has doubts about whether an action or decision complies with the principles of the Code of Ethics, he or she should ask the following questions:

- *Is my action or decision legal and in line with company policy?*
- *Am I able to make an impartial decision that is in the company's favor and does not favor a personal interest to the detriment of the company?*
- *Can I make this decision in accordance with my conscience?*
- *Would the validity of my decision stand up to the scrutiny of a third party?*
- *Does my action or decision protect our company's reputation?*

If, in good faith, he or she answer "yes" to each of these questions, there is a good chance that their action or decision is correct. If in doubt about any of the questions, the employee should not act or make a decision without first seeking advice from management.

## How do I report a critical situation or ethical malfunction

? When an employee (permanent or occasional) or an external stakeholder (partner, co-contractor, sub-contractor, supplier, service provider etc) is confronted with an ethical problem or a breach of the rules of this Code of Conduct, resulting from the activity of the Group, one of its subsidiaries or one of its direct partners, he/she must refer in good faith and in a disinterested manner :

- By referring to his/her direct line manager or to the Group Human Resources Director or or the Group Compliance Officer,
- or failing that, send an e-mail to the address specially dedicated to reports of non-compliant behavior: [alerte@ateliersdefrance.com](mailto:alerte@ateliersdefrance.com). If the report of such behavior concerns the Chairman or the Managing Director of the Group, he/she should send an e-mail to the following address : [alerte2@ateliersdefrance.com](mailto:alerte2@ateliersdefrance.com).

The Ateliers De France Group will ensure that any concern of an ethical nature concerning possible inappropriate behavior by an entity, an employee or a commercial partner is examined and that appropriate measures are decided and implemented.

The Group pledges to protect employees from possible reprisals and to preserve their anonymity, if they report breaches of the Code of Ethics in good faith. In general, the company will systematically give its support to employees who put respect for the company's ethical rules above other interests. Good faith is understood to mean that an alert is reported without malice or expectation of personal gain and that the employee has reasonable grounds for believing in the veracity of the remarks reported in the alert (definition taken from " The anti-corruption system of the Sapin II law, Practical Guide for the implementation of anti-corruption measures imposed by law on companies ", Transparency International France, 2017).