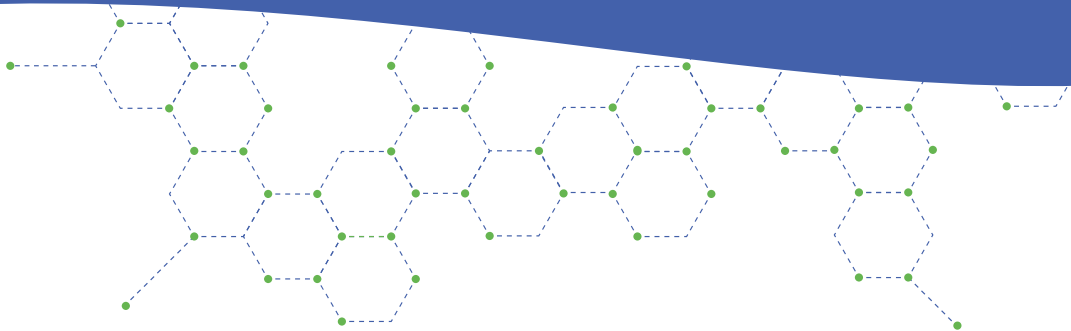


CODE OF ETHICS

HTL GROUP



EDITORIAL

The HTL Group is a group of biotechnology companies specialised in the development and production of innovative pharmaceutical grade biopolymers. For 30 years, we have partnered with leading pharmaceutical and medical device companies around the world.

The rapid growth and internationalisation that the HTL Group has experienced in recent years and the increasing number of regulations in the countries where we operate require us to take into consideration new risks and challenges.

Our behaviour and professional decisions are binding to the HTL Group and can have an impact on our business, environment and reputation.

It is essential that all employees (managers, employees, trainees, apprentices or temporary workers), at all levels of the group and in all countries, always act in compliance with the laws and regulations applicable to our business but also with the good practices, rules and ethical principles to which we adhere.

Therefore, in order to achieve its development and growth objectives in a legal and ethical manner, our HTL Group has decided to adopt this Code of Ethics.

This Code reflects our values of excellence, responsibility, passion and our pioneering spirit and sets out the fundamental rules and principles to be followed by all of us in our day-to-day business activities.

This Code is designed to help us make the right decisions in accordance with the applicable rules and ethical principles.

No practices contrary to the principles set out in this Code of Ethics will be tolerated!

Please read it carefully and consult it whenever you have any doubts about an activity carried out on behalf of the HTL Group.

Compliance with the law and ethics is all of our responsibility to ensure the HTL Group's present and future!

Kind regards,

François Fournier, President

Signature:



The members of the Executive Committee:

Yvon Bastard, Operations Director

Anthony Bresin, R&D Director

Laurène Brodiez, Chief Commercial Officer

Christophe Coyard, Industrial Performance Director

Marie-Armelle Floc'h, Quality Director

Bertrand Hurtault, Strategy and Transformation Director

Emmanuel Lefevre, Human Resources Director

Cyril Picault, Operations Director

Nicolas Préfol, Administration and Financial Director



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INTRODUCTION

Reminder of the HTL Group's values

- **Excellence:** The HTL Group's teams cultivate exceptional know-how which spreads as our production capacities grow.
- **Responsibility:** The HTL Group undertakes to transform the biopolymer sector into a positive and sustainable force.
- **Passion:** The HTL Group's teams are passionate about their work and use their expertise to create innovative solutions, while trying to always exceed customers' expectations.
- **Pioneering Spirit:** Since it was founded, the HTL Group has driven innovation in the biopolymer sector.

Why put this Code of Ethics in place?

- To recall the HTL Group's ethical principles and values as well as the rules applicable to our activities.
- To guide and help every employee incorporate these HTL Group rules, principles and values in their daily business activities and observe them.
- To give examples of behaviour to avoid, which is contrary to the law or ethics, and of the right habits to adopt.

What is the purpose of this Code of Ethics?

- This code of ethics stipulates the ethical rules, values and principles that the HTL Group's employees and directors must observe within the framework of their professional activities.
- This code of ethics also aims to ensure the HTL Group's business partners observe these principles when they interact with the HTL Group.

Who does this Code of Ethics apply to?

- It applies to **all the HTL Group's employees** in all the countries where the Group is present.
- We also want **our business partners** to adhere to the principles stipulated in this Code of Ethics: suppliers, customers and third parties.

How do you use this Code of Ethics?

- This code of ethics must be used by employees as a **guide of good conduct** in their everyday professional activities.
- It is each employee's responsibility to **read this code of ethics carefully** and **refer to it** every time there's any doubt about the behaviour to adopt in a professional situation.

- If, however, the employee does not find a clear answer in this code as to how to behave, they should ask themselves the following questions:
 - Is it legal?
 - Is it in line with the HTL Group's policies and procedures?
 - Is it respectful towards employees, customers, suppliers and other stakeholders of the HTL Group?
 - Does it contribute to the purpose and values of the HTL group?
 - Would I be comfortable if it made the headlines or the media?

If you cannot answer 'Yes' to all the questions, please discuss them with your manager or the HTL Group Ethics Officer (ethique@htlbiotech.com).

What if my country's rules are different from the Code of Ethics?

If local legislation contains requirements that are greater than or additional to those set out in this Code of Ethics, such local legislation shall apply. Conversely, if the Code of Ethics sets a higher standard, the Code of Ethics takes precedence over local legislation. If there is a conflict between local legislation and this Code of Ethics or if you are unsure of the applicable rules, please contact the HTL Group Ethics Officer as indicated in the Help and Contacts section.

Compliance with this Code and sanctions for non-compliance

This code should guide the actions of each employee when acting on behalf of the HTL Group. All employees must comply with the rules and principles of the HTL Group as set out in this code.

No behaviour contrary to the principles and values of the HTL Group or to the law will be tolerated. Any employee who violates, encourages or allows a violation of this code will be subject to disciplinary action up to and including termination of employment.

Help and contacts

All employees may make comments, suggestions or ask questions in relation to this code of ethics to the HTL Group Ethics Officer (ethique@htlbiotech.com).

WE ENSURE COMPLIANCE WITH THE LAW

Rules and principles

1. Compliance with international principles

The HTL Group is committed to respecting the main international texts on human rights, international labour standards, the environment and the fight against corruption:

- The **United Nations Universal Declaration of Human Rights** and the **European Convention on Human Rights**;
- Various **International Labour Organisation** conventions, in particular Conventions 29, 105, 138, 182 (child labour and forced labour), 155 (workers' health and safety), 111 (discrimination), 100 (remuneration), 87 and 98 (freedom of association, right to organise and collective bargaining);
- The **United Nations Convention on the Rights of the Child**;
- The 10 principles of the **United Nations Global Compact** (HTL has adhered to this since 2022).

2. Fight against corruption

The HTL Group complies with the applicable anti-corruption laws and regulations in France, namely the *SAPIN II law*, and abroad, namely the laws in the UK (*Bribery Act*) and in the US (*Foreign Corrupt Practices Act* or 'FCPA').

In order to comply with the anti-corruption legislation mentioned above, the HTL Group has adopted an **anti-corruption code of conduct** which covers all the principles to be respected in the areas of corruption and influence peddling, conflicts of interest, financial integrity and anti-money laundering, gifts, invitations and business meals, sponsorship and patronage.

As a reminder, the **anti-corruption code of conduct** formalises the HTL Group's commitment to preventing, prohibiting and punishing behaviour that runs counter to the values and ethics of the HTL Group and to anti-corruption laws.

3. Whistleblowing system

To protect its employees and comply with the legislation in force, the HTL Group has set up an internal whistleblowing system which includes i) an **ethics whistleblowing** system, in accordance with the *SAPIN*

II law, ii) a system to **blow the whistle and leave the workplace in the event of serious and imminent danger** and iii) a **whistleblowing** system for **public health and the environment** in accordance with the French Labour Code.

If an employee believes that a law, regulation or one of the principles set out in this code is being or is about to be breached, they may make a report, in accordance with the rules set out in the whistleblowing procedure.

It is recalled that public health and the environment whistle-blowers have the same protection as ethics whistle-blowers since the French *law no. 2022-401 of 21 March 2022, the 'Waserman' law*. The right to blow the whistle and leave the workplace in the event of serious and imminent danger entitles the employee to the specific protection provided for in Article L4131-3 of the French Labour Code (i.e. protection against disciplinary sanctions and salary deductions for the period during which the employee has left their workplace).

Reactions to adopt

- ✓ **Comply with the law and regulations applicable** to the HTL Group and all the codes, charters and procedures of the HTL Group.
- ✓ If you are faced with a situation that could be classified as corruption (e.g. receiving a gift), refer to the HTL Group's **anti-corruption code of conduct**, available at <https://htlbiotech.com/> and on the <https://www.integrityhub.net/> platform for all employees.
- ✓ Refer to the whistleblowing procedure and the whistle-blower charter and report any fact or behaviour that is illegal or contrary to this Code of Ethics. The **HTL Group's whistleblowing procedure**, available at <https://htlbiotech.com/> and on the <https://www.integrityhub.net/> platform.

✔ Practical scenarios

One of your regular suppliers sends you several bottles of Champagne. How should you respond?

➔ You should refuse these gifts and return them to the person who sent them. The value of this gift exceeds the amount authorised by the *HTL Group's gifts, invitations & business meals procedure*.

In the context of the export of goods, our parcel is blocked in customs and the local authorities tell us that the parcel will be released once a gratuity has been paid to them. What should you do?

➔ You must refuse because it is a bribe. As a reminder, the payment of bribes, cash and similar items is strictly prohibited (see our anti-bribery code of conduct).

During several meetings, one of your colleagues often makes inappropriate comments about your appearance, and you are at a loss as to what to do.

➔ You can first talk to your manager, the Ethics Officer or blow the whistle via the whistleblowing system. The HTL Group does not condone any form of harassment.



WE WORK WITH EXEMPLARITY

Rules and principles

1. Respect for employees and respect at work

The HTL Group promotes **respect for people, its employees and their well-being at work**. The HTL Group is committed to making the health, quality of life and well-being of its employees a priority. The HTL Group is committed to supporting career paths based on the principles of respect, collaboration, inclusion and transparency. Each employee of the HTL Group can express themselves, be heard and contribute to the group's success in their own way.

The HTL Group ensures that its employees deal with each other in a friendly and courteous manner, in order to promote a **pleasant working environment** for all.

The HTL Group **prohibits and punishes any attack on the dignity and respect of individuals**, including moral and sexual harassment as well as any form of discrimination: race, ethnicity, religion, gender, health, lifestyle, politics, physical appearance, sexual orientation, etc.

A difference in treatment may only be permitted where (i) it is based on competence, experience or objective criteria meeting a professional requirement and (ii) the objective pursued is legitimate and the requirement proportionate.

The HTL Group **prohibits the consumption and circulation of alcoholic beverages, narcotics or drugs** in the workplace in order to ensure safety and the protection of employees' physical and mental health.

The **company's assets** are made available to employees to carry out their work. Thus, the material provided and the financial means must be used within the framework of a professional activity. Incorrect use of these resources can adversely affect the performance of the HTL Group. Personal use of communication tools is tolerated within reasonable limits and provided that such use does not interfere with the group's professional activity and interests. Each employee must take care of the assets provided by the HTL Group and ensure that they are protected and maintained.

2. Respect and promotion of diversity and inclusion

Diversity means what makes us different and unique. **Inclusion** means that which allows us to incorporate differences in order to create a sense of belonging and to turn them into a collective strength.

Consequently, the HTL Group is committed to recruiting people with a variety of profiles at all levels and in all professions (leadership, projects, operational, technical, etc.). The HTL Group is committed to making the necessary adjustments to take into account mental or physical disabilities or cultural, religious or family differences, etc.

Each employee of the HTL Group participates in the actions implemented by HTL to ensure and develop respect for **diversity and inclusion**. Each employee is committed to understanding and changing their own biases, and to raising the alert and acting at their level to change inappropriate behaviours and biases in order to improve diversity and inclusion within the HTL Group.

3. Confidentiality of personal data and respect for privacy

The HTL Group is committed to respecting the **protection of personal data** of all its stakeholders, including its employees and business partners. The HTL Group only collects and stores the data necessary for its activities.

In Europe, under the *General Data Protection Regulation (GDPR) of 27 April 2016*, the processing of personal data is defined by a directive, which has been transposed into the laws of the member countries of the European Union and in particular by the data protection act in France. The transfer of such data from a European country to a non-European country is regulated. The HTL Group therefore ensures the same level of protection and security when exchanging data between its inter-group subsidiaries.

The protection of personal data guarantees the data subject an individual right of control over the collection, processing, use, dissemination and storage of data (e.g. right of access, rectification, deletion, etc.). The confidentiality of personal data is also governed by internal documents and procedures relating to these subjects (e.g. IT charter, procedure for exercising rights, photo release form).

4. Managers' responsibility

The HTL Group has implemented a **managerial reference framework** and is committed to training its managers in order to support them in their development and in carrying out their management duties.

The managerial reference framework defines 12 managerial skills and behaviours that each **manager** undertakes to respect and apply on a daily basis for themselves and their teams:

- Demonstrate courage and responsibility,
- Give meaning,
- Cooperate and create cohesion,
- Develop oneself and the team
- Promote a culture of continuous improvement,
- Act with kindness and mutual respect,
- Listen and facilitate exchanges/situations,
- Drive engagement,
- Explain and support change,
- Develop oneself and the team,
- Manage performance,
- Be curious and open to the world.

Reactions to adopt

For more details, HTL Group employees can consult:

- ✓ The **IT charter**, which can be read on the HTL Group's EDM;
- ✓ The **internal rules and regulations**;
- ✓ The **disconnection charter**;
- ✓ The **Inclusion and Diversity Policy (planned for the end of 2023)**

Practical scenarios

You need to transfer personal data to a company outside the European Union and you are wondering how to do this.

➔ You should contact the Legal Department, which will tell you how to proceed. You can transfer data outside the European Union (EU) and the European Economic Area (EEA), provided that a sufficient and appropriate level of data protection is ensured. These transfers must be governed using different legal tools.

My printer at home no longer works but my daughter urgently needs to send a presentation for her homework. Can I type it up and print it out at the office?

➔ You may use your computer for personal documents as long as it is on a one-off basis, reasonable, does not interfere with your work and is done outside your working hours.

The Communication Department is organising a photo shoot with a photographer who will take pictures of our production site and some of the employees present on the premises that day. You are wondering whether or not it is compulsory to be photographed and what use will be made of these photos.

➔ If you consent to be photographed, the Communication Department will give you a 'Authorisation for image and voice rights' form for you to sign. This form formalises your consent to be photographed and specifies the use and media on which your photo will be communicated.



WE TAKE ACTION WHILE PROTECTING OUR ENVIRONMENTS

Rules and principles

1. Corporate Social Responsibility

This code is part of the HTL Group's ambition to deploy a Corporate Social Responsibility ('CSR') approach. All of the principles supported by the HTL Group have been transcribed in the [CSR charter](#).

As such, the HTL Group's CSR performance is periodically assessed by [ECOVADIS](#) an internationally recognised organisation. This CSR maturity assessment validates the positive actions implemented and helps to identify areas for improvement.

2. Respect for health, safety and the environment

In order to guarantee the health and safety of its employees as well as the protection of the environment, buildings and property, the HTL Group implements a binding risk prevention policy: Health, Safety, Security and Environment. At the same time, the HTL Group is committed to working with its customers and stakeholders to reduce its environmental footprint in order to combat climate change and act to preserve resources.

An annual HSE prevention improvement programme is implemented. Its role is to establish an [integrated HSE culture](#) in the prevention of accidents and occupational wear and tear, prevent industrial risks and develop new manufacturing processes that are safe, sustainable and reduce environmental impact. Risk training is a major component of the HTL Group's training programme (fire, specific risks, working at height, etc.).

In a robust process of continuous improvement, the HTL group has had its environmental management system recognised through [ISO 14 001: 2015 certification](#).

Finally, as part of the transformation of the HTL Group, HSE aspects are incorporated from the pre-project phase to be taken into account, thus preventing all risks and incorporating the latest HSE standards.

3. Quality and safety of our products

The HTL Group's priority is to protect its business partners and customers and vice versa. With the deployment of the ['Quality By Design'](#) approach, our [Quality Management System \(QMS\)](#) is fully integrated into the life cycle of our products, from development to the use of our products by the end customer. Procedures describing the guidelines relating to [good quality practices](#) have been put in place to ensure management and adherence to [GMP \(Good Manufacturing Practices\)](#). To this end, internal mechanisms have been put in place:

- to train all employees in [Good Manufacturing Practices \(GMP\)](#),
- to ensure data integrity ([DATA INTEGRITY](#)),
- to produce high-quality biopolymers,
- to ensure the traceability of our production chain,
- to assist our customers in the drafting and submitting their regulatory dossier.

4. Sustainable procurement

The HTL group has implemented a ['sustainable procurement' charter](#) as part of its relations with suppliers. Thus, our criteria for choosing suppliers must be based on [responsible commitments](#).

As part of this policy, the HTL Group strives to:

- explore all possible partnerships with its suppliers and subcontractors according to a responsible and fair procurement process;
- maintain sustainable business relationships with suppliers and subcontractors that respect human welfare, environmental protection and business ethics;
- make responsible and sustainable purchases by favouring, as far as possible, short procurement circuits with local or national players;
- not enter into a business relationship with a partner or subcontractor that may represent a conflict of interest or risk of corruption;
- establish all our needs in the form of a contract or purchase order in order to guarantee the transparency of our purchases;
- identify its critical suppliers on the basis of environmental criteria such as ISO 14001 or ISO 20121 certification;
- include its suppliers and subcontractors in a progress approach surrounding technological, logistical and CSR aspects;

- cease all relations with a supplier in the event that the latter does not maintain the decent working conditions defined by the United Nations Global Compact.

🎯 Reactions to adopt

For more details, HTL Group employees can:

- ✓ Read the **CSR Charter** and the **environmental policy**;
- ✓ Read the **Quality manual**;
- ✓ Read the **'Sustainable procurement' charter**.

You are in a tender process. One of the candidates offers a very attractive price, but when you do some research you learn that this provider is the subject of numerous investigations for illegal work, bribery, etc. *What do you do?*

➔ The Legal and Compliance Department will carry out the assessment of the third party. If this shows non-compliance with the principles described in our Third Party Assessment Procedure, you will not be able to do business with this provider.

🎯 Practical scenarios

You have received a report from a supplier indicating that raw materials that have been delivered recently may be contaminated. These raw materials have been used in the manufacture of our product and the goods have already been delivered to a customer.

Are you wondering what steps to take following this information?

➔ You need to react quickly when there is a problem with the safety of our products. You should immediately discuss this with your line manager or your Quality Manager, so that the latter can apply the *recall - batch return procedure*.

You have received a large document by email. *You are reluctant to print it out or read it on your computer.*

➔ The HTL Group trains its employees on ecological actions to protect the environment and reduce its consumption of energy and natural resources. You should only print documents if strictly necessary.



WE RESPECT BUSINESS ETHICS

Rules and principles

1. Compliance with competition rules

The HTL Group adheres to the principles of **free and fair competition**. The HTL Group's business strategy is based on **high-quality products, customer service and innovation**.

The HTL Group is committed to respecting all applicable legal provisions on competition and to fighting against anti-competitive practices such as **unlawful agreements and abuse of a dominant position or unfair competition** in all the countries where it operates.

An anti-competitive **agreement** has the purpose or effect of undermining or hindering competition. It is formalised in an agreement or results from a concerted practice between two or more companies. For example, an agreement between competing companies to fix the selling prices of their products is a prohibited anti-competitive agreement.

Abuse of a dominant position consists of a company in a position of power on a market (e.g. if it has a market share $\geq 50\%$) adopting certain behaviour that is harmful to competition. For example, a dominant company that charges very low prices (predatory prices) with which rival companies could not compete.

These practices, which are contrary to the competition rules, are liable for very heavy penalties.

Some **good habits** to avoid committing such practices are listed below:

- Do not discuss with HTL Group competitors matters relating to:
 - the sales prices produced,
 - the distribution of markets,
 - projects and business strategies,
 - company acquisition projects,
 - existing contracts with suppliers or customers.
- Do not attend meetings of professional organisations or unions where such matters may be discussed.
- Do not obtain information about competitors illegally or unfairly (e.g. theft, obtaining information from new employees who have worked for competitors).
- Do not obtain confidential information belonging to a third party without the express consent of that third party (in particular by signing a confidentiality agreement with such third party).

2. International trade

The HTL Group has customers and partners in several countries.

The rules on **international trade** including embargoes and economic sanctions imposed by one country (or by the European Union) may apply to transactions in another country.

Employees involved in **international trade** must be aware of and comply with these rules and restrictions on exports, customs duties and embargoes. Failure to comply with these restrictions may result in civil and criminal penalties.

The HTL Group ensures that every shipment of products to our customers or receipt of raw materials is carefully examined for compliance with these rules.

In addition, before entering into a commercial relationship with a partner, employees must check with the Legal and Compliance Department that the planned transaction is possible with regard to the applicable restrictions and embargoes.

3. Protection of intellectual and industrial property

The HTL Group has **scientific, technical and commercial know-how and business secrets** that are unique and confidential.

The HTL Group makes it a point of honour to protect its know-how and business secrets. Each employee must therefore draw up a **non-disclosure agreement** before disclosing confidential information to a partner (see § 4 Confidentiality and sensitive information below).

The HTL Group also protects **confidential information belonging to external partners** in accordance with its contractual commitments (see § 4 Confidentiality and sensitive information below).

The HTL Group also protects and commercialises its inventions, distinctive signs and logo by **filing patents, trademarks or any other appropriate forms of protection**. We are working to secure intellectual property rights in several countries around the world to ensure ownership of our innovations.

If there is any doubt about the confidentiality of any information or whether it should be protected, the

employee should contact the Legal and Compliance Department.

4. Confidentiality and sensitive information

The HTL Group makes it a point of honour to protect its **sensitive and confidential information** and that of its partners.

Sensitive and confidential information means: scientific, technical, organisational, regulatory, economic and commercial information, manufacturing processes, know-how, business secrets, technical drawings, technical data, plans (including product or research plans), diagrams and descriptions, formulae, processes, ideas and inventions (whether patentable or not), designs, etc.

All non-public information must be protected in order to respect the principles of business secrecy. The HTL Group has world-class expertise that needs to be protected. Unauthorised disclosure of this information could affect the competitiveness of the HTL Group and will be subject to infringement or unfair competition proceedings.

Therefore, all employees should strive to protect the HTL Group's confidential information from theft, loss, copying or misuse.

The group asks all its employees to be vigilant. The sharing and communication of confidential information should be governed by a **confidentiality** and non-disclosure agreement signed beforehand. However, this agreement does not relieve employees of their duty of care, particularly during conversations or work sessions in public places (e.g. restaurants, trains, planes).

Employees should also:

- only disclose the confidential information necessary for the discussions and/or the completion of the project;
- only collect the confidential information belonging to the external partner that is necessary for the discussions and/or the implementation of the project;
- document exchanges of confidential information in writing for evidential purposes;
- limit the disclosure of confidential information to only those who need access to it;
- take appropriate security measures to protect the HTL Group's information and that of the external partner.

The HTL Group also protects **confidential information received from its external partners** in accordance with its contractual obligations and in particular against external threats and data loss.

The HTL Group organises awareness and prevention campaigns against the risks of cybercrime in order to promote the right habits and reactions to adopt in order to avoid the risks of intrusion into its computer systems, phishing or ransomware.

Reactions to adopt

- ✓ Any disclosure of **confidential data** belonging to the HTL Group to a third party is subject to the prior signing of a non-disclosure agreement.
- ✓ Compliance with the applicable legal and regulatory provisions, in particular as regards the disclosure of financial information, respect for copyright, privacy, business secrecy and confidentiality.
- ✓ Compliance with competition rules.

For more details, HTL Group employees can read:

- ✓ **The 'confidentiality' quality procedure;**
- ✓ **The third party assessment procedure.**
- ✓ **The 'prevention of fraud attempts' procedure.**

🎯 Practical scenarios

You are in contact with a supplier in the context of work on our industrial process. The supplier would like you to communicate certain technical information concerning the industrial tool, its operation, etc. *You are wondering how to proceed.*

➡ You may not pass on confidential information without first signing a non-disclosure agreement or a contract containing a confidentiality clause. We do not tolerate any disclosure of confidential information without this protection in order to preserve our know-how.

A foreign company contacts you about buying our product. You have heard that the country where this company is located is subject to export restrictions. *What should you do?*

➡ You should contact the Legal and Compliance Department who will perform due diligence to verify notably whether any embargo, export restrictions or sanctions exist with respect to the country where this company is located and the company itself and its directors. As a reminder, some countries are currently subject to export restrictions measures taken by the European Union and/or the United States. Non-compliance with such restrictions exposes HTL Group to criminal and/or civil sanctions.

You are a business developer and you are on a business trip to a trade fair in Munich. At this event, you meet an acquaintance who tells you that he works for a competitor. During a dinner you come to talk business and he tells you that given the market his company is going to increase its prices. He asks you what your company's position is?

➡ You cannot exchange price information with a competitor. Immediately end the discussion by saying that unfortunately you cannot discuss the subject with them. Tell your superiors because this discussion could be akin to an unlawful price agreement.



WE COMMUNICATE TRANSPARENTLY

Rules and principles

1. Compliance Ambassadors

HTL wanted to put in place **Compliance Ambassadors** within the HTL Group to relay the principles of this code and answer any questions employees may have about the principles of this Code of Ethics.

The Compliance Ambassadors will raise questions and concerns from employees and will be the spokesperson for the Legal and Compliance Department in the field. They ensure that the Group's ethical policies are properly implemented. Regular reviews with the Legal and Compliance Department are carried out to ensure proper implementation and to discuss the progress of actions and the next steps.

2. Protection of the reputation of the company and its employees' reputation

The HTL Group is keen to **protect its image and reputation**.

To guarantee its reputation, the HTL Group has appointed representatives and spokespersons who are authorised to speak on behalf of the HTL Group, namely the Communication Department. The Communication Department is the only department authorised to receive and process requests from external contacts, journalists, media, institutional players and politicians. Therefore, if employees of the HTL Group are approached by journalists, media representatives or other persons outside our company, they should forward the request to the HTL Group Communication Department.

Within the framework of its employees' professional and personal use of social networks, the HTL Group has adopted a social networks charter to guarantee the best practices to adopt. The means of communication must be used in a responsible manner which must not be insulting, abusive, undignified or disrespectful.

3. Transparency and integrity in relations with the public authorities

The HTL Group does not contribute financially or by any other means to **a political party or activities**, either directly or indirectly.

However, the HTL Group respects the rights of employees to engage in political activities using their own means and outside their working hours. Employees must ensure that their views and actions are not attributed to the company. Employees may not use HTL Group resources to support political parties, causes or candidates, or to promote personal political views.

In its **relations with the public authorities**, the HTL Group acts ethically and transparently in a professional manner. The HTL Group collaborates on many issues with different public institutions as a result of its activity. We therefore ask all of the group's employees to respect the legislation on the fight against corruption with regard to public officials and to respect the rules of the French High Authority for Transparency in Public Life (HATVP).

4. Charity, patronage and sponsorship activities

The HTL Group wishes to support projects of general interest in line with **its commitments, values and principles**. The group has set up a '**Sponsorship and Patronage**' procedure in order to manage its participation in community life and contribution to civil society. The HTL group aims to fully embody the model of a socially responsible, transparent and supportive company that is open to its ecosystem.

Requests for donations and sponsorships are subject to approval by a dedicated committee.



🎯 Reactions to adopt

- ✓ Compliance with the **Social Media User Charter**;
- ✓ Unless expressly authorised, do not speak for or on behalf of the HTL Group,
- ✓ If you have any questions, please contact the Communication department.

🎯 Practical scenarios

Can I put some very funny pictures of some of my colleagues on my personal Instagram that were taken at the end-of-year party organised by the company?

➡ Prior consent must be requested from the people concerned. You also need to ask yourself: what image will I convey of myself, my colleagues and my company by posting these photos online? If you have any doubts, please contact the Communication Department and/or the Legal and Compliance Department.

I'm going to attend a conference with local elected representatives and companies from the same employment area. I have to make a presentation about the company at this conference. *Who should I contact to prepare it?*

➡ You should contact the Communication Department to find out what information you can disclose.

I want to be politically active in my home town and I intend to say publicly that I work for HTL. Am I allowed to?

➡ The HTL Group does not interfere in the private lives of its employees or in their personal activities, including their political commitments. However, you cannot associate the HTL Group with your political beliefs. The Group could be seen as supporting the political party you belong to.

BEYOND, TOGETHER, SUSTAINABLY, WITH INTEGRITY

