



ROBERTET
GRUPE

ROBERTET GROUP ANTI-CORRUPTION CODE OF CONDUCT

FOREWORD

Robertet's anti-corruption code of conduct refers to the United Nations Convention and the French Sapin II anti-corruption law, and is committed to combating all forms of corruption.

This code is an integral part of Robertet France's internal regulations. It demonstrates the Robertet Group's commitment to fighting corruption.

However, a document cannot cover every case of corruption and influence peddling that may occur in the course of day-to-day business, so everyone needs to use their own judgment and common sense.

If you have any questions about how to proceed, please contact the Anti-Corruption Compliance Director.

This code will be updated as necessary in line with developments in Robertet's anti-corruption system, which complies with the French Sapin II law and applicable national and international regulations.

Our training and awareness-raising plan is one of the measures we have taken to control the risk of corruption for all our employees. More specific training is given the employees most exposed to the risk of corruption, in line with our risk analysis, associated action plan and Robertet risk mapping.

The Robertet Group has a culture of compliance and integrity, and expects each of its employees to commit to the Robertet Anti-Corruption Code of Conduct. The Group's reputation depends on the actions and behavior of each and every employee, and as such we will not tolerate corruption in any form.

Corruption alerts are handled in accordance with our Group ethics alert procedure 01-350006.

I. SCOPE AND APPLICATION

The Robertet Group anti-corruption code of conduct applies to all Robertet employees worldwide and to all Robertet business partners.

Every employee is expected to behave in an exemplary manner within their own business line, and not to do anything contrary to the rules of conduct set out in this Code.

Any questions an employee may have concerning the application or interpretation of the Code should be referred to their line manager or to the Anti-Corruption Compliance Director.

2. BASIC RULES AND THEIR VARIATIONS

DEFINITIONS

Corruption is behavior whereby a person (public official or private individual) directly or through an intermediary offers, requests or accepts a gift, an offer or a promise, presents or benefits of any kind with a view to performing, delaying or omitting to perform an act directly or indirectly that falls within the scope of their duties in order to obtain or retain a commercial or financial advantage or influence a decision.

There are two types of corruption:

Active corruption usually refers to the offering or paying of the bribe

Passive corruption refers to the person who is being bribed, i.e. the person who performs or does not perform an act in exchange for something in return.

Corruption can take many forms under the guise of common business or social practices, including invitations, gifts, sponsorships, donations, commissions and so on.

Influence peddling is when a person uses their position or influence, real or perceived, to influence a decision made by a third party.

It involves three players: the beneficiary (the person who provides benefits or gifts), the intermediary (the person who uses the credit they possess by virtue of their position) and the target person who holds the decision-making power (public authority or administration, magistrate, expert, etc.).

PRINCIPLE AND RULES

Employees must not engage in bribery or corruption, and must not use intermediaries such as agents, consultants, advisors, distributors or any other business partners for the purpose of committing acts of this kind.

2.1. RULES SPECIFIC TO PUBLIC OFFICIALS

DEFINITIONS

The term "public official" refers to a person entrusted with public authority, entrusted with a public service mission or invested with a public elective mandate, for themselves or for others.

PRINCIPLE AND RULES

Bribery of public officials is punishable by more severe penalties.

Any relationship with a public official must comply with the regulations governing it (i.e. the regulations applicable in the public official's specific country or those imposed on them by their employer). While not prohibited by law, any benefit granted to a public employee must be fully transparent vis-à-vis the company, and subject to prior authorization by management.

If someone find themselves confronted with a proposal, they should ask themselves:

- Is this compliant with laws and regulations?
- Does this comply with the Code of Conduct and the company's interests?
- Is it devoid of self-interest?
- Would I be embarrassed if my decision were communicated?










2.2. GIFTS AND INVITATIONS

Receiving or offering a gift or invitation must not be intended to influence a decision in business relationships.

Receiving or offering a gift or invitation is acceptable if it meets the following rules:

- Transparent, reasonable and proportionate, in line with the business relationship in question,
- Notify the hierarchy of any gifts or invitations received, with a record of details if applicable, in accordance with the conditions set out below
- Refuse to receive or give cash gifts.
- Offer gifts and/or invitations of a reasonable value, in accordance with the laws and values of the Robertet Group

GIFTS AND INVITATIONS SCALE

STATUS OF GIFTS, HOSPITALITY, HOTELS IF:	GIFTS & INVITATIONS RECEIVED OR OFFERED	HOTEL/RIGHT/PER PERSON RECEIVED OR OFFERED
In association with  Reasonable and proportionate  Listed in the books  Express gratitude  Allowed by the law 	 Less than €100	 Less than € 200
AUTHORIZED, IF YOUR MANAGER IS AWARE OF IT AND HAS ACCEPTED IT, FOR EXAMPLE BY E-MAIL. Their authorization must be formalized by email, even after the fact. The expense claim must include the name and position of the guest.	 From €100 to €200	From € 200 to € 500
MAY BE AUTHORIZED IN TRULY EXCEPTIONAL CIRCUMSTANCES Please contact the Anti-Corruption Compliance Manager for France or the Director of a subsidiary or office outside France	 Over €200	Over € 500

CURRENT THRESHOLDS MUST BE RESPECTED IN ALL SITUATIONS

ROBERTET

EXAMPLES

1. Alex, a supplier you've been working with for several years, sends you a parcel containing a rare bottle of wine worth over 200 euros to celebrate your successful collaboration to date.

However, in accordance with your company's anti-corruption policy, you know that you cannot accept gifts of this value from customers.

You sincerely thank Alex for his generosity and thoughtful gesture, but politely explain that you cannot accept the bottle of wine due to the company's strict ethical rules regarding gifts of significant value. If the bottle is delivered to you despite these explanations, notify your line manager and organize a draw within your department for someone to win the bottle.

2. Sophie, an employee, wonders if she can accept a VIP invitation from a supplier, Pierre, to see an exhibition or a show for two people. To make an informed decision, she needs to consider a number of points, such as the estimated value of the gift, its nature, context and frequency.

The value of the gift is estimated at around 150 euros. Insofar as this exhibition or show retraces the history of perfumery and provides an opportunity to meet other people from this professional milieu, this invitation seems justified. Sophie informs her line manager, Marc, in line with company policy.

3. A new sales contract worth 5 million euros is signed. The sales partner would like to invite the Robertet team of three to an exclusive dinner once the contract has been signed. The cost per person for dinner is €220. These are exceptional circumstances which may be authorized and must be declared to the Anti-Corruption Compliance Director in France and to the Director of the subsidiary or office outside France.

2.3. DONATIONS TO CHARITABLE OR POLITICAL ORGANIZATIONS

DEFINITIONS

Gifts and donations are benefits given in the form of money and/or contributions in kind; they are allocated for a specific purpose: research, training, the environment (sustainable development), charitable or humanitarian purposes..

Political contributions - whether monetary or non-monetary - are intended to support political parties, leaders or initiatives.

PRINCIPLE AND RULES

Requests for gifts, donations or contributions must be considered with care, especially those from people in a position to influence the company's activities or who might, if the gift were granted, derive a personal benefit.

Requests for donations must be approved by General Management.

2.4. PATRONAGE, SPONSORSHIP

DEFINITION

Through patronage or sponsorship, the company wishes to provide financial or material support for a charity, social, cultural or sporting project, in order to communicate and promote its values.

PRINCIPLES AND RULES

Any patronage or sponsorship must be carried out without seeking any specific benefit from the beneficiary other than the promotion of the company's image.

2.5. FACILITATION PAYMENTS

DEFINITION

Facilitation payments are unofficial payments (as opposed to legitimate, official duties and taxes) made to facilitate or speed up administrative formalities such as permit applications, visas or customs clearance...

PRINCIPLE AND RULES

Robertet Group does not accept "facilitation payments" except for compelling reasons (health, employee safety, etc.).

2.6. THIRD-PARTY MONITORING (SUPPLIERS, SERVICE PROVIDERS, CUSTOMERS)

DEFINITION

Monitoring covers third parties, whether natural or legal persons, with whom the company interacts and who may in some cases present a particular level of risk in terms of corruption.

Third parties include: business partners, suppliers, service providers, agents, customers, intermediaries, etc

PRINCIPLE AND RULES

Robertet Group is committed to ensuring that third parties respect its principles and values, and to carrying out appropriate due diligence where necessary.

2.7. CONFLICTS OF INTEREST

DEFINITION

Conflicts of interest arise from any situation in which the personal interests of employees conflict with their duties or responsibilities and the interests of the Robertet Group.

PRINCIPLE AND RULES

If circumstances arise that could prompt a potential conflict of interest, the employees concerned should report this via IM 350009.

If any circumstances give rise to an actual conflict of interest, the employees concerned must report it by following the Group ethics alert procedure 01-350006.

EXAMPLE

1/- A supplier delivers new ovens to the Robertet Group. They are inspected by an employee who happens to be the supplier's cousin. If the employee has a family relationship with the supplier, they must inform their line manager and complete the IM 350009.

2/- A direct Robertet customer has a family member in Robertet's sales department with whom they could be in contact for annual negotiations. The Robertet sales representative must report this to their line managers.

2.8. ACCOUNTING RECORDS/INTERNAL CONTROLS

DEFINITION

The Robertet Group must ensure that its accounting departments and/or its internal and/or external auditors are attentive in their checks regarding the concealment of corrupt practices in books, records and accounts.

PRINCIPLE AND RULES

Employees working on accounting control assignments (audits, certification of accounts) must be particularly vigilant as to the fairness and accuracy of the accounts.

3. APPLYING THIS CODE OF CONDUCT

3.1. TRAINING

Employees are required to familiarize themselves with this Code and to take part in training sessions organized by the Robertet Group to raise their awareness of the fight against corruption. New employees are made aware of the Code when they join the company.

3.2. REPORTING NON-COMPLIANT PRACTICES AND WHISTLEBLOWER PROTECTION

By following the procedure defined by the company, "Group Ethics Alerts Procedure" 01-350006, any employee can report any behavior that does not comply with the anti-corruption code of conduct:

- If faced with a risk of corruption;
- If they believe in good faith that a violation of the Code has been, is being or may be committed;
- If they discover that someone is suffering some form of reprisal for having reported in good faith.

Any employee who, in good faith and in a disinterested manner, reports a violation or risk of violation of the Code will be protected against all forms of reprisal.

Their identity and the facts will be handled in accordance with the applicable regulations.

Furthermore, a mistake made in good faith will not result in any disciplinary action, whereas deliberately abusive or malicious reports will be subject to sanctions.

The Navex alert tool enables all Group employees, and more generally anyone connected with Robertet, to report acts or behavior in violation of applicable laws or regulations of any kind, including corruption. This tool (NAVEX) can be accessed in several ways:

- Either directly via the following website www.Robertet.ethicspoint.com
- Or via its website www.robertet.com (at the bottom of the page in the Legal section)
- Or by telephone (see box) from any country where Robertet is present through its subsidiaries, branches or representative offices
- Or via QR code (posters will be displayed on our premises).

3.3. WHISTLE-BLOWING SYSTEMS AND PERSONAL DATA PROTECTION

Employees are informed of the existence of the system.

In accordance with the regulations applicable to the protection of personal data in most of the countries in which the company operates and, in particular, within the European Union, any person identified within the framework of a whistleblowing system, whether they are the sender or the subject of the alert, may exercise their right of access to the data concerning them.

Each individual may also request the rectification or deletion of personal data if it is inaccurate, incomplete, ambiguous or outdated using the same methods..

3.4. PENALTIES FOR BREACHES OF THIS CODE

Failure to comply with the rules will engage the employee's personal responsibility and expose them to sanctions, notably on the part of the company, but also under criminal law, depending on the applicable legislation.

The company undertakes to:

- Take all declarations into account;
- Investigate alerts carefully;
- Assess the facts objectively and impartially;
- Take the appropriate corrective measures and disciplinary sanctions as defined in the internal regulations in the Sanctions section of articles 13 and 14.

3.5. IMPLEMENTATION: RESPONSIBILITY AND MONITORING

Each employee is responsible for implementing the Code within the scope of the responsibilities arising from their position in the company.

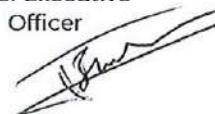
The company carries out periodic checks to ensure that practices are compliant.

The company's and/or the group's governance bodies provide regular updates on the implementation and follow-up of alerts.

July 10, 2024

JÉRÔME BRUHAT

Chief Executive
Officer



¹ French law criminalizes active corruption (the briber) and passive corruption (the person being bribed) in the same way. For an individual, the maximum penalty is 5 years' imprisonment and a fine of €500,000 (which can be increased to double the proceeds of the offense).

