



CORPORATE ETHIC CHAPTER

SAINT JEAN INDUSTRIES

INTRODUCTION

The Group of Saint Jean Industries is built on several dozen years of history, very closed to the Family owner and founder. Women and men who are involved have contributed to a sustainable growth. They have molded and forged the corporate human value of the group:

Involvement, humility, creativity, team spirit and passion

General mission of *Saint Jean Industries* Group:

« Work for a cleaner world by reducing the natural resources consumption with less capital, energy and time ».

CHAPTER 1 – Respect of Fundamental Human Rights

In all subsidiaries of the group, the value creation is generated by the people development. Therefore, the prevention of any risks and consequences related to human right is of the fundamental basic in our corporate policy. In addition to the top priority related to safety at work, we apply in our HR processes as in our daily activities on our business and with our partner, the following principles related to Human rights:

- No child will be asked for a forced in our company or within the supply chain and its business relation. Nobody will be submitted to a forced labor in our company or within our partners.
- Any form of harassment or discrimination including any distinction, exclusion or preference based on sex, ethnicity, skin color, national extraction or social origin, religion or political opinions either in the recruitment process or in people management will be tolerated. The respect of the “person” must, in any case, not be impacted by a behavior or decision related to the group’s activities.



- Whenever external stakeholders, employees, or other Saint Jean Industries Partners believe that a violation of the principles contained in this policy has occurred, they can report it immediately without any fears to the following employer' entities: top management and/or human resources managers and/or employee's representatives.
- All staff member hired by Saint Jean Industries or within our partners must be managed in accordance of the Labor law of the country they are working in.

CHAPTER 2 – Prevention of the corruption – Code of Business Conduct

Definition of the different behaviors which are prohibited because it may be considered as attempt of corruption or influence peddling:

- Activities of « Influence Peddling » are performed by people who have a concrete decision maker status or pretend to have an influence and base on that statement request and accept gifts, offers or promises, to get from a third-party advantages and favors.
- Actions of corruption is characterized by the endeavor to get, from a person empowered and by the way of any advantages, decisions to take actions or not which are related of her responsibilities.

As a result, it is strictly forbidden to try to get gifts or offered services by anyone who has any sales relationship with our company; the targeted advantages concerned all employees and their family members, or to accept any gift or offered services, for which in return it could influence or give the feeling of influence the decisions of the company.

For the gifts which are delivered directly to the company, the manager of the concerned person must be informed to manage to share / distribute those gifts.

RECIPROQUELY, all employees will never and in any way engage action of Influence peddling and actions of corruption. Internal audit managed by the Finance department will allowed to confirm the absence of such practices. However, invitation of clients to business lunch or events (such as exhibitions) are tolerated if and only if they have previously informed the top management of the company.



CHAPITRE 3 – Environmental Policy

Saint Jean Industries believes that ensuring respect of the environment is an essential value.

All our facilities and plants are compliant with the ISO 14001 environmental regulation. Thus, the group is committed to meet the need of its customers and to create value for its stakeholders, whilst reducing its environmental impact. Furthermore, *Saint Jean Industries* promotes the environmental respect throughout its entire value chain.

CHAPITRE 4 – Whistleblowing Policy

Definition: « **A whistle-blower** is a person who reveals or inform without any personal interest and in good faith, a crime, an offence, a threat or a serious injury for the general interest; who has been personally aware. ».

In this policy and in some countries by law:

« Any individual that is concerned by a malpractice can report it in a confidential manner the related information even if it is confidential without any fears if it is done in good faith and with the objective to protect the general interest.

How to proceed: 3 communication channels

1. Direct or functional manager
2. The employer: Top management or Head of Human Resources
3. Employee representative

Protection of Whistle-blowers:

Saint Jean Industries is committed that any whistle-blower can reveals any deviation related to this policy, without any fear and under confidentiality.

Olivier BETOU
Chief HR officer