ETHICAL AND SOCIAL

CODE OF CONDUCT

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Radiall™ | SIMPLIFICATION *is our* INNOVATION

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OUR **COMMITMENT**

At Radiall, we are empowered by our diversity and united behind a single goal: to simplify the lives of those who innovate. We strive to bring you interconnection technologies that are so easy to implement you cannot imagine how you managed without them. Our people are committed, bold and eager to explore ideas, and the trusting relationships that they build with you are the cornerstone of everything we do.

At Radiall, we safeguard everyone's rights and freedoms. We ensure that our employees have freely chosen to work for us, and we never use any form of forced labor. We expect all third parties working with Radiall and all our stakeholders to uphold these same standards.

Ethics form one of our fundamental values. Consequently, we make certain that all areas of our business are entirely free from corruption and influence peddling and that human rights are respected throughout their operations.

Our customers' challenges motivate us to do everything we can to establish ourselves as their primary product development partner. By working alongside them today, we demonstrate our commitment to ongoing investment.

We recognize that simplification starts with us, but proves its true benefits when it reaches you.

Simplification is our Innovation.

Pierre Gattaz
CEO

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SCOPE OF APPLICATION **OF THE CODE**

This code applies to all employees of the Radiall Group, and to all relations with our partners. Employees means anyone linked to Radiall SA or one of its subsidiaries (known collectively as "Radiall") by a contract of employment (fixed-term, permanent, internship, apprenticeship, temporary, etc.). Partner means anyone working with Radiall or representing it, including Radiall's sub-contractors, intermediaries, contractors, suppliers and customers.

This document is brought to the attention of Radiall employees and partners. A copy is given to all new staff when they join the company, and it is available to download on the Group intranet and website (www.radiall.com).

It aims to set a common framework for Radiall's culture of integrity and business ethics.

The code also serves to define and illustrate the various forms that corruption and influence peddling can take, to meet the requirements of French law number 2016-1691 of 9 December 2016, covering transparency, economic modernization and the fight against corruption, known as the Sapin II Law.

OUR **ETHICS**

The Radiall Group runs its commercial operations with integrity and moral rectitude, in compliance with all the applicable laws and regulations. It fosters a spirit of mutual respect and openness within the working environment, in which each and every person has a responsibility for upholding the reputation of the company.

This code lays down Radiall's expectations of its employees and partners. The principles in this document detail how employees and partners should behave in certain circumstances, in order to uphold Radiall's good reputation. Breaching the code puts our organization and its employees at risk of serious sanctions, and may have a detrimental effect on our business, the environment, people and the reputation that we have worked so hard to build together.

All Radiall Group employees therefore have a responsibility to comply with the rules laid down in this code. Radiall actively checks that these rules are followed to the letter. Any breach may result in disciplinary action, and ultimately dismissal, and in civil or criminal charges being brought before the relevant courts of law.

The Radiall Group and its employees act in good faith in all their business and financial dealings, behaving irreproachably and showing integrity. A person showing integrity is honest and fair and respects others. Employees are expected to analyze each situation and act in accordance with these principles.

Showing integrity also requires each one of us to recognize that our decisions can affect those who do not have the opportunity to take part in the decision-making process. That is why management and in particular members of the ESC (Executive and Strategic Committee) and the OSC (Operational Steering Committee) believe in the importance of acting in an exemplary manner in line with our values. The company's management acknowledges that it is, first and foremost, responsible for the autonomy and confidence that we transmit to our teams.

Radiall expects its employees to demonstrate exemplary professional conduct in all situations.

Every employee must act with integrity in everything they do, which means:

- Being vigilant,
- Participating in training and training others,
- Complying with regulations and standards,
- Helping, and asking for help when it is required.

Every employee must help others by:

- Being available,
- Sharing,
- Advising.

Every employee has a duty to make a disclosure in the event of a risk for the business or for an individual. They must:

- find the courage to act,
- and keep in mind the extent of the negative consequences that would result from failing to make a disclosure.

OUR **VALUES**

Our company culture is our best asset. It "drives us forward"[1]. It draws our employees together, and helps us to share the same values so we can reach the same goals. It reaches beyond our differences to create a bond between us. It reaches beyond words to help us to understand each other and pull in the same direction.

Our values define our behavior and our actions.

GROW TOGETHER

"Growing together and helping grow the world around us is our signature. We are a community rich in diversity and with a strong team spirit, which is open to all of those around us. We strive to be exemplary to our customers, our partners and our environment. Sharing our values with enthusiasm results in a positive footprint everywhere."

BE GENUINE

"To be genuine is part of our DNA. We listen to each other with kindness and we speak honestly and without reservations. Being ourselves, regardless of the circumstances, guarantees mutual trust and personal growth so that we move forward together. We are proud of fulfilling our promises!"

MAKE IT SIMPLE

"Simplicity is proof of genius. We encourage agility, we focus on the essentials, we value direct communication, and we strengthen autonomy in decision-making. Simplifying our way of working also means making the life of our customers and partners easier. To be accelerators of innovation is our mission."

DARE TO BE AUDACIOUS

"Audacity is our fuel! Taking risks and pushing our limits are challenges that stimulate our creativity. We do not say "It is impossible!". Instead, we say, "How do we do it?". It is from this mentality that solutions beyond what our customers can imagine emerge. Inventing to surprise, this is how we make the difference."

Note

1. From the Radiall 2025 white paper – Employee comment

COMPLIANCE WITH THE RULES **LAID DOWN IN THE CODE**

THE WAY WE DO BUSINESS – COMPLIANCE WITH STANDARDS

Compliance with the laws and regulations covering our sites and our business dealings is mandatory (regardless of whether they govern employment, tax, customs, exports, competition, the environment or any other area). When the provisions of the code differ from locally applicable laws and regulations, these laws and regulations take precedence.

Any suspicion that fraud has been committed or the rules laid down in the code have been breached must be reported. All employees must be conscious that breaching the law or regulations may result in civil and/or criminal charges being brought against them as an individual or against the company.

Because we operate in many different countries, we are particularly attentive to the issues covered by the fundamental conventions of the International Labour Organization (ban on child labor and forced labor, respect for freedom of association), to promoting diversity and equality, to the right of populations to dispose of their natural resources and to the right to health. We also place great importance on upholding human rights.

WHAT TO DO IN THE EVENT OF A BREACH

We recognize that some situations can be complex. Our code sets the Group's standards for various instances. We expect all our employees to carefully read the code in full so that they understand Radiall's expectations and standards with regard to ethics. This document is your point of reference should you have a doubt or concern.

Obviously, no document can cover every situation that may arise. If you are in any doubt, you should ask yourself:

- Is this legal?
- Is this compliant with the code?
- Is this in line with our principles of integrity, respect and transparency?
- Does this uphold the company's positive image?
- Have I ensured there is no risk of a negative impact on the company?
- Would I feel comfortable if my decision was made public, inside and outside the company?

If the answer to one of these questions is "no," or if you have a doubt, or if you witness behavior that contravenes the principles of the charter or that seems inappropriate, **the golden rule is to report it**, as applicable, to your line manager, to your site Compliance Champion, or to the Ethics Committee in accordance with the whistle-blowing process set out in this code.

It is vital to communicate openly before taking action.

Radiall will not tolerate any form of retaliation against an employee or partner who has, in good faith, reported a discrepancy, in accordance with the Whistleblower's Guide deployed within the Group.

THE WHISTLEBLOWING PROCESS

Any employee of the Radiall Group, or any partner, who is aware of a situation that could breach the rules and values laid down in this code is required to report it to their line manager, their site Compliance Champion or the Ethics Committee at the company head office in France, which can be contacted by emailing: **contact@radiallethics.com**.

The process can also be used by any employee or partner who needs help or advice in relation to the code and how it operates, in particular:

- if they are faced with a risk of fraud or corruption,
- if they believe, in good faith, that the code has been breached,
- if they discover that they have suffered a negative consequence as a result of having made a disclosure in good faith.

All disclosures will be handled diligently and in complete confidentiality by the Ethics Committee, which will investigate the facts reported.

A Whistleblower's Guide is available giving details of the system that has been set up and the procedure for making a disclosure. It is available on the Group intranet.

As a whistleblower, you can also make a disclosure to:

- one of the relevant authorities listed in the annexe to decree no. 2022-1284 of 3 October 2022,
- the Defenseur des Droits (the French Defender of Rights, an independent government body),
- the law enforcement authorities, i.e. the public prosecutor.

ETHICS COMMITTEE

The Radiall Ethics Committee was set up in 2018. Its role is to receive and process disclosures that come to its attention as part of the whistleblowing process. Members are appointed by the CEO for a three-year team. They are people recognized by the company for their skills, integrity, fairness and knowledge of the Group.

SANCTIONS FOR MALICIOUS DISCLOSURES

No disciplinary measures will be taken as a result of a genuine error. However, disclosures that are malicious or made with the intent to cause harm will result in sanctions, and in some cases criminal charges under the relevant legislation.

AWARENESS & TRAINING

Employees are required to read the code and, when they are invited to do so, to take part in the training sessions organized by the company as regards combatting fraud and corruption. The code is presented to new employees when they join the company.

OUR GOOD **PRACTICE PRINCIPLES**

COMBATING CORRUPTION AND INFLUENCE PEDDLING

CORRUPTION, INFLUENCE PEDDLING & FACILITATION PAYMENTS

DEFINITIONS

Corruption (also known as bribery): when someone asks for or accepts a gift or any other advantage in return for doing, or refraining from doing, something as part of their job role, or to influence their decision.

- Corruption is active when the act of corruption is at the initiative of the person who commits it.
- Corruption is passive when the act of corruption is at the initiative of the recipient, i.e. the person who does something or refrains from doing something in return for a gift or advantage.

Influence peddling: when someone receives payment in return for a real or apparent position or influence enabling them to sway a decision made by a third party. This involves three parties:

- a beneficiary (who supplies the advantage or gift),
- an intermediary (who uses the credit afforded to them by their position),
- and the target, who has the decision-making power (public authority or government body, magistrate, expert witness, etc.).

Influence peddling is a form of corruption.

Facilitation payment: an unofficial payment (as opposed to official taxes and duties) paid to facilitate or accelerate an official, generally bureaucratic, process, such as an application for a permit, visa or customs clearance.

PRINCIPLES, RULES & RESPONSIBILITIES

All forms of corruption and influence peddling are illegal in all the countries in which the Radiall Group operates. Acts of corruption can lead to heavy fines and prison sentences.

In some instances, granting an advantage to a public official is not illegal and does not constitute corruption. If an advantage is granted in such circumstances, the company must be fully aware and the line manager must give prior permission.

We must never commit acts of corruption and we must not use intermediaries such as agents, consultants, advisers, distributors or any other commercial partner with the aim of committing such acts. The Group has zero tolerance for corruption.

GOOD & BAD PRACTICES

Do

- Refuse to pay or receive a bribe or any other type of personal advantage.
- Inform your line manager, the Compliance Champion or the Ethics Committee of any corruption attempts, requests for illegal payments or other corrupt practices.
- Use the whistleblowing process to make the Ethics Committee aware of all acts of corruption.
- Accurately and honestly record all transactions made in Radiall's name in the company accounts.
- Help ensure that all information in documents, including in financial and extra-financial reports, is always accurate.
- Keep these documents safe and comply with the archiving rules.
- Follow the internal verification procedures, which help us ensure that the customers we work with are running legitimate and lawful businesses whose financial resources do not come from criminal sources.
- Cooperate with internal and external auditors.
- Should any doubt arise, ask your line manager, the Compliance Champion or the Ethics Committee for advice.

Don't

- Offer facilitation payments (bribes) or other illegal payments for any reason whatsoever.
- Offer, promise or give money with the aim of obtaining any kind of unwarranted advantage for Radiall.
- Pay an invoice for a service which was never rendered.
- Accept a cash payment.
- Accept or receive a payment in return for confidential information.
- Agree to pay anyone other than the person who provided the service.
- Accept a payment coming from a tax haven.

GIFTS & ACTS OF HOSPITALITY

DEFINITIONS

Gift: any form of payment, gratification or advantage (whether monetary or not), given or received directly.

Act of hospitality: an advantage in any other form received free of charge, such as a meal, accommodation or entertainment (show, concert, sporting event, etc.).

PRINCIPLES, RULES & RESPONSIBILITIES

Although gifts and acts of hospitality are a normal part of doing business, they can constitute acts of corruption if they are excessive.

We therefore need to be attentive regarding the gifts and acts of hospitality that we give and receive. While they help to maintain good relationships, they can also be considered as a means of influencing a decision or favoring a particular person or business.

When we give or receive a gift or act of hospitality, we need to ask ourselves three questions:

- What is the purpose of the gift or act of hospitality?
  - The purpose must never be to encourage someone to do or refrain from doing something, as this would be a form of corruption.
- How often do we receive/do we give these gifts and acts of hospitality?
  - If it's just once a year, the risk is low. However, if it happens frequently, then we need to be aware that there is a risk and let our line manager know.
- What is the value of the gift or act of hospitality?
  - If the gift or act of hospitality has only a nominal value, the risk of corruption is low.
  - If, on the other hand, we feel that the value is disproportionate, then it is probably an attempt at corruption.

We must always comply with the Gifts and Hospitality Procedure, which can be found on the Group intranet.

GOOD & BAD PRACTICES

Do

- Refrain from giving or accepting gifts that could be considered as acts of corruption.
- Refuse to grant privileges or advantages.
- Politely decline a gift if the value is excessive, by explaining Radiall's rules.

Don't

- Ask for gifts or acts of hospitality.
- Offer or accept a gift or provide a service that you would not be capable of justifying to your colleagues, your family or the media.
- Accept a service offered to you personally.
- Accept a loan.
- Accept a gift or act of hospitality that would make you feel indebted to someone.
- Accept a gift or act of hospitality in connection with an important decision, or during the bidding phase.

SELECTING PARTNERS & TREATING THEM EQUALLY

DEFINITIONS

Partner: anyone working with Radiall or representing the Group; in particular sub-contractors, intermediaries, contractors, suppliers and customers.

Intermediary: anyone acting on behalf of and in the name of the Radiall Group, and who therefore has the power to bind the company by their signature. This includes but is not limited to:

- distributors,
- sales representatives,
- lobbyists.

PRINCIPLES, RULES & RESPONSIBILITIES

Radiall's dealings with its partners extend beyond simply buying and selling services – they are an essential part of our Group's long-term success. We attach great importance to the quality of relationships we build with our partners.

We ensure that these relationships are healthy and based on the principles of impartiality, fairness and honesty. We respect our partners' independence and their individual identities and ensure that we select them based on objective criteria.

Because we believe in the importance of this approach to doing business, and because the way our partners operate also affects our reputation as a company, each partner receives a copy of the Supplier Ethical and Social Charter. We expect them to commit to complying with the rules laid down within it, or equivalent principles.

GOOD & BAD PRACTICES

Do

- Use open, competitive tender processes to select suppliers.
- Ensure that all responses are compared and considered on an equal basis, without favoritism.
- Ensure that the tender process is transparent and communicate notice of the decision based on objective criteria.
- Ensure that all our partners understand and meet our expectations in terms of ethics.
- Verify that our partners are not financially dependent on Radiall to an excessive degree.
- Raise partners' awareness of the importance of complying with ethical rules and the laws and regulations that apply to our Group.

Don't

- Impose excessively demanding conditions on our suppliers, especially as regards payment terms or delivery lead times.
- Continue to work with a supplier who repeatedly fails to meet our expectations or who does not comply with our ethical principles, in particular as regards human rights and/or fighting corruption.

DONATIONS, PHILANTHROPY & SPONSORSHIP

DEFINITIONS

Donation: any transfer of ownership (generally financial) freely given with no commercial consideration.

Philanthropy: any financial or material support given to a charity or social, cultural or sporting project as a way of communicating and promoting the company's values, without expecting anything in return.

Sponsorship: when a company provides financial support to a person, event, organization or product in return for advertising.

PRINCIPLES, RULES & RESPONSIBILITIES

Radiall encourages support for local communities in the areas where it operates. We authorize reasonable donations to charities in countries where this is legal.

Some donations, philanthropy and sponsorship can be interpreted as concealed illicit payments. To guard against this risk, Radiall only finances associations and foundations and only becomes involved in sponsorship projects if the activities concerned are legal and in keeping with the Group's values and priorities.

All requests for donations, philanthropy and sponsorship must be considered carefully, especially if they come from people with the capacity to influence the company's operations or who stand to gain a personal advantage if the donation, philanthropy or sponsorship is granted. All requests for donations, philanthropy and sponsorship must be approved by the Ethics Committee.

GOOD & BAD PRACTICES

Do

- Understand that becoming involved with a public interest initiative is a medium-to-long-term commitment.
- Have a clearly defined plan of how the partnership underpinning any action you enter into is to develop in the future, whatever the scale of the action.
- Seek the prior agreement of the Ethics Committee before entering into any commitment on Radiall's behalf.

Don't

- Involve the company in your personal charity or political work without the prior agreement of the Ethics Committee.
- Commit Radiall to any actions that do not reflect the Group's ethical principles or its strategy as regards charity projects.
- Oblige company employees or partners to give gifts or money to philanthropic projects supported by Radiall.

CONFLICT OF INTEREST

DEFINITIONS

Conflict of interest: any situation involving interference between an employee's work and their personal interests that is liable to influence the choices they make in the course of their work and which could jeopardize their impartiality or neutrality. There are three types of conflicts of interest:

- **Actual conflict of interest:** situation in which a conflict of interest exists.
- **Potential conflict of interest:** when the employee is in a situation which could lead to a conflict of interest, but the conflict of interest has been avoided due to the context or the employee's actions.
- **Perceived conflict of interest:** situation which a third party could reasonably consider as a conflict of interest.

Nepotism: unfair practice where someone uses their authority to secure an advantage for a relative.

PRINCIPLES, RULES & RESPONSIBILITIES

In the course of their work, employees must act solely in Radiall's interests. They must not obtain, either directly or indirectly, any personal advantage or gain. All employees are expected to make decisions based on a complete understanding of the facts and to act in the interests of the company. Consequently, they should avoid any situation where their own personal interests or those of a friend or relative would be in conflict with Radiall's interests.

Employees must not intentionally enter into a situation where a conflict of interest would exist, and must avoid being a party to any evaluation, meeting or decision if they or a friend or relative has a personal interest in the topic in question. No one at Radiall, whatever their position in the hierarchy, can approve a potential conflict of interest issue relating to them personally.

When circumstances give rise to a potential or actual conflict of interest, the employees concerned must inform their line manager, the site Compliance Champion or the Ethics Committee.

GOOD & BAD PRACTICES

Do

- Obtain prior written permission from your line manager before entering into a transaction on behalf of Radiall if you or one of your friends or relatives has links with the company concerned.
- As part of a recruitment process, ensure the HR department and your line manager are aware of your family links with job applicants to avoid nepotism and conflicts of interest.
- Inform your line manager, the Compliance Champion or the Ethics Committee immediately of any situation where a conflict could exist between your personal interests or those of a friend or relative and Radiall's interests.

Don't

- Allow your personal relationships with partners to influence the decisions that you make on behalf of Radiall.
- Use your role at Radiall or any confidential information or knowledge to gain an advantage directly linked to your personal interests.
- Be directly involved in employing, managing or promoting a member of your family.
- Conceal information about a conflict of interest.

LOBBYING

DEFINITIONS

Lobbying: action of entering into contact with people with public decision-making power linked to Radiall's business sector to persuade them to act in a way that benefits the sector and therefore Radiall.

PRINCIPLES, RULES & RESPONSIBILITIES

The practice of lobbying is regularly criticised by the media and public opinion.

Nevertheless, when it is carried out in a reasonable, legal, responsible and transparent way, it can be a positive force for decision-making in the public sphere.

As Radiall employees, you are required to inform your line manager, the Compliance Champion or the Ethics Committee of any lobbying that you carry out, regardless of the country concerned. We must also ensure that our lobbying activities are not undertaken for purposes contrary to Radiall's interests.

The Group accepts lobbying as a practice, but requires us to comply with the following rules:

- Make the public decision-makers aware that we are acting on behalf of Radiall,
- Ensure the information we supply is reliable and verifiable,
- Act in compliance with the rules laid down in this code and in particular as regards ethics and fighting corruption,
- Add our name to lists of lobbyists if this is a legal requirement in the country in which we are operating.

GOOD & BAD PRACTICES

Do

- Keep Radiall's interests in mind in everything you do.
- Notify Radiall of all lobbying activities, whether they are linked to its business or not.
- Comply with the rules applicable in the countries in question, for example by putting your name on any compulsory registers kept locally.

Don't

- Use gifts to attempt to influence public decision-making.
- Lie to stakeholders to try to influence a decision in an unlawful manner.

COMBATTING MONEY LAUNDERING & TERRORIST FINANCING

DEFINITIONS

Money laundering: process of disguising the nature and origin of funds gained through illicit or criminal activities such as organized crime, drug trafficking, illegal dealing in arms, property or goods, illegal employment, people trafficking, exploitation of prostitution and serious, organized tax fraud, to disguise their source and make them appear legal.

Terrorist financing: act of supplying or collecting money (of legal or illegal origin), in the knowledge that it is to be used to finance terrorist activities.

PRINCIPLES, RULES & RESPONSIBILITIES

Money laundering and terrorist financing are illegal activities. Engaging in them is against the law. They carry heavy penalties (fines and prison sentences) in all the countries in which the Radiall Group operates.

Such practices represent a risk for Radiall, and the group must on no account be associated with actions of this type. If such practices were to occur and became public knowledge, damage would be caused to the Radiall Group's image, both in the business world and with the public.

It is therefore vital that we know our partners well and ensure that their businesses are not being used to launder money or finance terrorist activities.

GOOD & BAD PRACTICES

Do

- Be vigilant regarding the ethics of our partners and the origin of the funds we receive.
- Raise any suspicions with your line manager, your site Compliance Champion or the Ethics Committee.
- Take action if you become aware of an "atypical" transaction (payment from a country other than that where the service is provided, payment to an account where the holder's name is unknown, etc.).

Don't

- Accept unusual or unjustified payments.
- Be involved in concealing the origin of funds.
- Agree to make or receive a cash payment.

INTERNATIONAL TRADE SANCTIONS & EXPORT CONTROLS

DEFINITIONS

International trade sanctions: ban or restriction on specified commercial activities with certain countries or with governments, individuals or companies on sanctions lists. Sanctions can take various forms:

- **Asset freezing:** a ban on entering into business relationships with the individual in question.
- **Sector embargo:** a ban on carrying out certain activities in the zone in question.
- **Global embargo:** a ban on carrying out any activity whatsoever in the zone in question, other than where an exception exists.

Export controls: a set of international regulations and laws governing the export of information, services and technologies classified as "sensitive" abroad, in order to protect the interests (economic, strategic and diplomatic) of a state.

PRINCIPLES, RULES & RESPONSIBILITIES

As an international company, Radiall is subject to numerous international trade sanctions regulations. In addition, because of the sector in which we operate, we are also required to comply with multiple sets of export control legislation. These require us to obtain "licenses" from the relevant authorities in the countries in which we operate before exporting or transporting our products.

Breaches of export control rules or international trade sanctions can result in serious criminal charges and heavy fines. Moreover, any failure to comply with these regulations would have a major impact on the Group's image.

GOOD & BAD PRACTICES

Do

- Obtain the information needed to identify your partner (name, address, tax reference, etc.).
- If you are involved in importing and exporting, be aware of the Group's rules on these topics.
- Speak to the compliance department if you have any doubts.
- Ask your partners to specify to you the origin of the goods and/or their final destination.

Don't

- Enter into any type of business relationship with a country under a global embargo.
- Export our products if Radiall does not have the necessary authorizations and licenses.

RESPECT FOR & PROTECTION OF EMPLOYEES

DEFINITIONS

Bullying and sexual harassment: behavior, words or repeated hostile actions that cause emotional or physical harm.

Forced labor: according to Convention 29 of the International Labour Organization (ILO), "all work or service exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily."

Child labor: according to the ILO, any work which deprives children of their childhood, their potential and their dignity, and that is harmful to their physical and/or mental development.

PRINCIPLES, RULES & RESPONSIBILITIES

Radiall complies with all applicable international laws and standards governing employment, and in particular those relating to working time, pay and freedom of association. Moreover, Radiall does not use forced labor or child labor and expects all its partners to adhere to the same standard.

Radiall recognizes the cultural, religious and individual diversity of its employees. The Group makes a point of eliminating all potential sources of discrimination. Bullying and sexual harassment contravene all legislation and will never be tolerated at Radiall.

Our company culture is rooted in our history and stresses our focus on relationships. The diversity of our talents boosts our creativity. Radiall has signed the "Diversity in Business Charter" (www.charte-diversite.com), which highlights our commitment to diversity and equal opportunities. We work with various charities, schools and universities to promote equal opportunities and raise awareness of the importance of protecting the environment.

GOOD & BAD PRACTICES

Do

- Support and promote Radiall's commitment to diversity.
- Ensure that our partners are aware of our policy regarding employment.
- Support and promote Radiall's commitment to harassment- and bullying-free workplaces.
- Respect others.
- Report any form of bullying or harassment.

Don't

- Refuse to grant a pay rise or employ a staff member for reasons such as sex, disability, sexual orientation, age or ethnic, social, cultural or national origin.
- Consciously seek to upset or offend someone, or to push them to make an error.
- Carry on with behavior after being told it is unwanted.

PROTECTION OF THE COMPANY ASSETS

DEFINITIONS

Company assets: all of the company's assets, including real estate, moveable property, production equipment and intellectual property.

Intellectual property: right by which the author of a creation can protect their work and secure the advantages resulting from it, and in doing so guard against counterfeiting and plagiarism. It includes both industrial property rights (which protect inventions, innovations and creations) and copyright.

PRINCIPLES, RULES & RESPONSIBILITIES

All of the company's physical assets, and intangible assets such as intellectual property rights, have a value and will be needed by the business to develop in the future. We are all responsible, as part of our job roles, for using the company's physical and intangible assets appropriately.

Divulging internal information without authorization can have detrimental consequences for Radiall. We must all ensure we keep the information we have in our possession confidential, both during our working relationships and after they have been concluded. We respect all non-disclosure agreements signed between the company and its partners.

Because innovation and research are key to our success, we respect Radiall's intellectual property rights and those of third parties by abstaining from any action or practice that could have detrimental consequences. In doing so, we ensure we comply with all legislation relating to patents, models, brands, copyright, etc.

GOOD & BAD PRACTICES

Do

- Respect the principle of confidentiality.
- Keep confidential data belonging to Radiall and its partners safe, whatever format it is in.
- Check with your line manager what information you are able to communicate before sharing anything with a third party.
- Protect the company's intellectual property rights by not giving out information about research and development work or current projects.
- Comply with the Group's procedures on how and where research and development data should be recorded.
- Remember that nothing is "secret" or "private" online.

Don't

- Discuss internal information or work on it in public places where conversations can be overheard.
- Take internal information, including any copies, with you if you leave Radiall.
- Make inappropriate use of information and communication technology (ICT) in a way that is detrimental to the system, the IT network or the interests of the business, individuals or customers.
- Disclose your passwords.
- Use or install software that has not received prior approval from the IT department.
- Leave research and development work or information relating to Radiall unprotected.
- Talk to journalists about Radiall without prior permission from your line manager, the Compliance Champion or the Ethics Committee.

COMPLIANCE WITH COMPETITION LAW

DEFINITIONS

Unlawful agreement: agreement between or concerted action by several companies to prevent, restrict or distort competition in a relevant market. Agreements can be:

- **Horizontal:** when they are made between competing businesses,
- **Vertical:** when they are made between businesses on different levels of a chain of production or distribution.

Abuse of dominant position: unilateral actions by a dominant business seeking to use anti-competitive practices to reinforce or extend its position.

Anti-competitive practice: behavior by a business or group of businesses that restricts, prevents or distorts competition in a relevant market.

Relevant market: a market consisting of all the products and/or services considered, in particular by users, as interchangeable or substitutable in terms of their characteristics, their price or the use for which they are intended.

PRINCIPLES, RULES & RESPONSIBILITIES

We must not, under any circumstances, share with our competitors information regarding the price of our products, the cost of producing them or Radiall's strategy. To do so could be seen as a breach of competition law.

Any breach of competition law can lead to fines proportional to the Group's turnover, and orders to pay damages to the economic entities that have suffered as a result of the practices.

Radiall and Radiall's employees never share confidential information or details about the Group's intellectual, industrial or commercial property when in contact with competitors.

GOOD & BAD PRACTICES

Do

- Comply with the regulations governing commercial and competitive practices in all the countries in which we operate.
- Give our partners a contractual responsibility to comply with regulations, just as we ourselves do.
- Inform your line manager, the Compliance Champion or the Ethics Committee if you have unintentionally received or used confidential or exclusive information relating to our competitors.

Don't

- Discuss or share sensitive commercial information with our competitors.
- Enter into an arrangement with a competitor.
- Use illegal methods to collect information about competitors.
- Be a party to an agreement with one or more competitors, suppliers or distributors, in particular to fix prices or assign customers.
- Abuse our dominant position on the market, where we hold one.

HYGIENE, HEALTH & SAFETY

DEFINITIONS

Occupational hygiene: according to the World Health Organization (WHO), a discipline that involves ensuring that the workplace is optimal for worker health and safety.

Occupational health: according to the WHO, occupational health aims to protect employee interests by:

- maintaining the highest degree of physical, mental and social well-being for employees,
- preventing the risks to which employees are exposed in their workplace to keep them safe from all harm,
- maintaining employees in a job role suited to their physiological and psychological capabilities.

Safety at work: a cross-disciplinary approach to limit or ideally eliminate the risk of accidents likely to occur during the course of work.

PRINCIPLES, RULES & RESPONSIBILITIES

Our Hygiene, Health and Safety policy is important to our operations and has been designed to complement Radiall's overall strategy. Our action plan defines the specific objectives that we work to achieve including:

- identifying, evaluating and reducing risks in the short and long term,
- providing training and suitable tools to reduce workplace accidents and occupational diseases,
- anticipating and taking account of the psychological and social impact of changes in working conditions.

It is vital that we act as role models with respect to safety. Consequently, we must make sure that our own working environment is safe and follow the safety rules laid down for the Group as a whole.

GOOD & BAD PRACTICES

Do

- Abide by the safety rules.
- Commit individually and collectively to improving safety within the company.
- Make sure that accident risks are precisely identified, make others aware of them and guard against them.
- Report all safety risks.
- Never enter any zone if you do not have authorization to be there.

Don't

- Ignore company rules relating to hygiene, health and safety at work.
- Do anything that would cause a risk for us or for others.
- Be under the influence of alcohol or drugs in the workplace.

PRIVACY & DATA PROTECTION

DEFINITIONS

Personal data: any information relating to an identified or identifiable individual. An individual can be identified:

- directly (e.g. by their family name and given name),
- indirectly (e.g. via a telephone or car registration number, an identifier such as a social security number, by an email or postal address, or by their voice or image).

Processing of personal data: defined by CNIL (the French data protection agency) as: an operation or set of operations carried out on personal data, regardless of the process involved (collecting, recording, organizing, storing, adapting, modifying, extracting, consulting, using, cross-referencing or communicating by transmitting, publishing or making available in any other way).

PRINCIPLES, RULES & RESPONSIBILITIES

Radiall ensures that its employees' and partners' personal data is processed in accordance with the relevant regulations, and in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of personal data and the free circulation of this data.

We respect the confidentiality of our employees' and partners' personal data and we collect and store only the data that is required in the course of our business. We are careful to collect personal data in a fair and legal manner by providing employees and partners with clear and precise information on who is responsible for the database, the purposes for which we use it, which responses are required and which are optional and the consequences of not providing information, the data recipients, the data subject's rights and any transfers of data to non-EU countries.

If you have any questions relating to the processing of personal data, please email: infocompliance@radiall.com

GOOD & BAD PRACTICES

Do

- Be aware that the company does not communicate personal data to third parties, except if there is a legal requirement to do so.
- Inform people that we are collecting their personal data.
- Collect only personal data that is necessary and appropriate to the purpose for which it is being collected.
- Delete or correct inaccurate or incomplete data.
- Ensure that personal data is kept completely secure and only stored for a predefined time period.
- Check with the Legal and Compliance Department before transferring any personal data to a third party.

Don't

- Fail to keep our colleagues' and partners' personal data confidential.
- Collect information without the consent of the person in question or only if the law requires us to do so.
- Collect "sensitive" data without this being required by law.
- Communicate personal data to anyone outside Radiall unless there is a legal obligation to do so (and after validation from the Legal and Compliance Department).
- Store personal information for longer than necessary.

FINANCIAL INTEGRITY

DEFINITIONS

Financial information: all the official communications (statement of financial position, statement of profit or loss and forward guidance) that companies are required to issue.

Integrity: honesty, absolute moral rectitude.

PRINCIPLES, RULES & RESPONSIBILITIES

We comply with all the regulations in place as regards tax, customs, accounting records and publishing our accounts. We undertake to keep and publish accounts that are accurate and genuine.

The accuracy and integrity of our financial reporting is one of the ways we earn the trust of all our stakeholders.

Internal and external fraud is a risk for the business's operations and its image. It generally involves an intentional action or omission. It consists of false, inaccurate and/or incomplete declarations or documents, presented with the aim of securing, without justification, the receipt, return or retention of funds.

GOOD & BAD PRACTICES

Do

- If you are responsible for accounting records (financial and management accounting staff) and audits (auditing and certifying accounts), be especially vigilant as regards the accuracy and genuine nature of accounts.
- Communicate with our shareholders in a way that is transparent, regular and precise.
- Ensure the accounting records, accounts and financial statements of the business and its various subsidiaries accurately reflect the transactions entered into.
- Make certain that accounting records meet the applicable legal requirements and Radiall's accounting principles and internal control systems.
- Report any potential, direct or indirect embezzlement affecting the company.

Don't

- Fail to comply with financial procedures.
- Fail to carry out the necessary checks when a risk to the integrity of the accounts or a failure to comply with regulations relating to fraud or corruption is identified.
- Fail to take into account the recommendations of the annual audit by the statutory auditor or any other audit.

ENVIRONMENT

DEFINITIONS

Environment: all the natural and cultural conditions that can affect living organisms and human activities.

PRINCIPLES, RULES & RESPONSIBILITIES

Radiall is committed to protecting the planet and the health and well-being of its employees. To do this, not only do we comply with local environmental laws and regulations, but we also strive constantly to improve our products and processes to ensure we can comply with environmental regulations without compromising the quality of our products. To this end, we abide by the European directives relating to:

- the use of certain hazardous substances in electrical and electronic equipment (directive 2011/65/EU (RoHS)) which requires electrical and electronic equipment (EEE) manufacturers to limit the use of six chemicals: cadmium, mercury, lead, hexavalent chromium, PBB and PBDE.
- the management of chemicals (compliance with REACH, the European Registration, Evaluation, Authorization and Restriction of Chemicals system).

Lastly, Radiall is careful not to contribute, either directly or indirectly, to any conflict. We are particularly attentive with regard to components, parts and products made with tin, tantalum, tungsten and/or gold, and to ores subject to a notification procedure such as cobalt and mica, to ensure that we obtain these raw materials from sources that are both socially and environmentally responsible.

GOOD & BAD PRACTICES

Do

- Think about how our actions, in all areas of the business, can impact the environment, in order to minimise this whenever possible.
- Contribute to Radiall's environmental initiatives.

Don't

- Ignore the company's environmental protection rules.

Radiall™ | SIMPLIFICATION *is our* INNOVATION