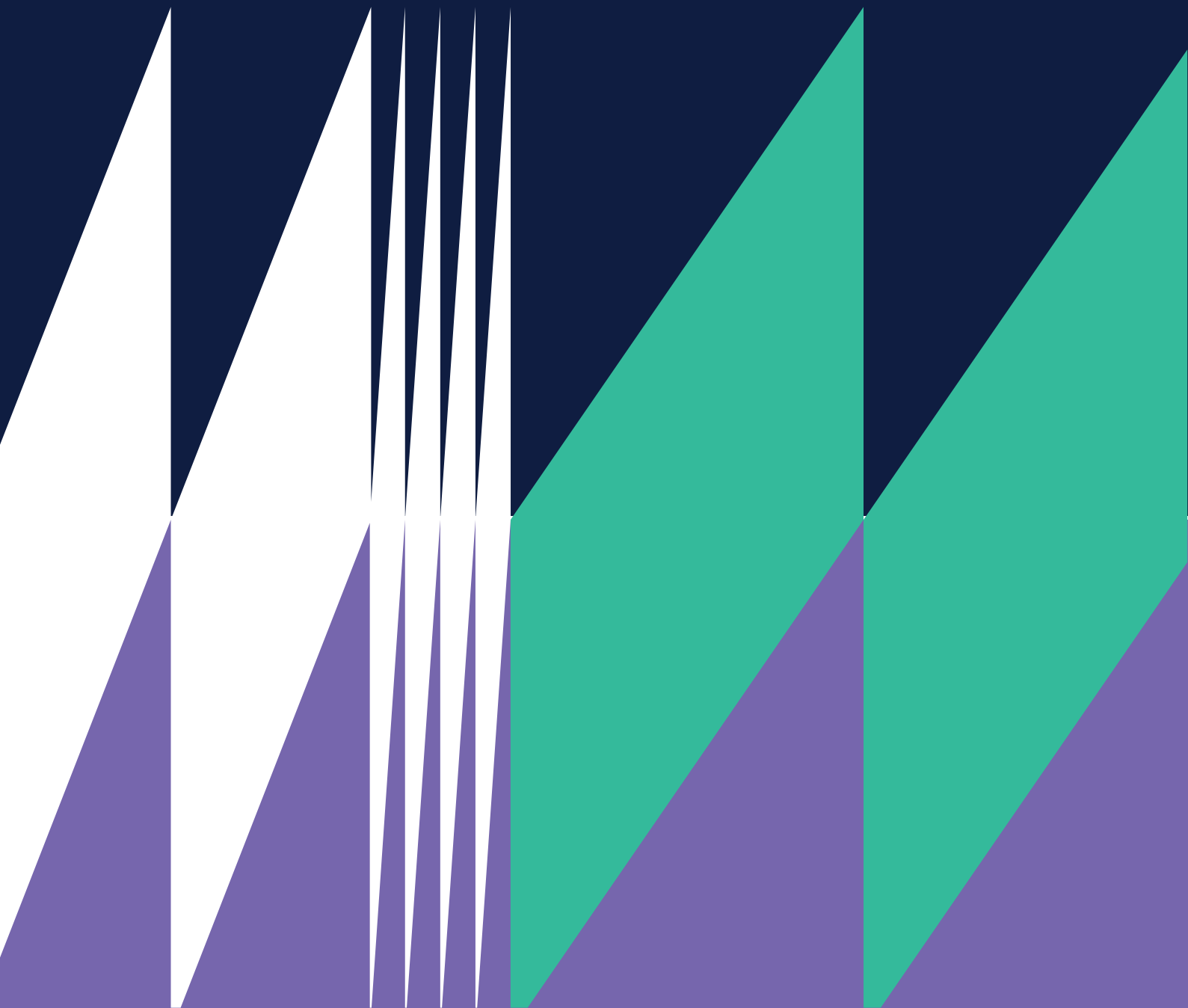


SEQENS

SUPPLIERS' CODE OF ETHICS



Introduction

SEQENS has built its strong reputation for integrity on its values and compliance with applicable laws. The SEQENS Group, all of its affiliated companies and all of its employees are committed to complying with all laws and regulations in the course of their activities. SEQENS undertakes to comply with the principles included in its Code of Ethics, available at the following address: <https://www.seqens.com/en/governance-compliance/>

SEQENS undertakes to comply with the fundamental principles and rights set out in the Universal Declaration of Human Rights as well as those set out by the International Labour Organization (ILO) and the Organization for Economic Cooperation and Development (OECD). SEQENS is a member of the United Nations Global Compact and the Responsible Care® initiative.

SEQENS attaches great importance to all its partners (customers, suppliers, subcontractors and intermediaries) sharing a common set of rules, practices and principles regarding business and work ethics, and respect for the environment.

We also ask our suppliers to comply with the ethical principles included in this Suppliers' Code of Ethics and ensure that their own suppliers and subcontractors comply with the same principles. The term "supplier" means any natural or legal person who provides any goods, services and/or technology to the Group.



We expect our suppliers to comply with applicable laws and ethical principles in the same way that SEQENS does. We require strict compliance with these standards by all our suppliers, their employees, production sites, and subcontractors.

The Suppliers' Code of Ethics applies to all suppliers and their subsidiaries worldwide. It is intended to apply wherever our suppliers do business – including overseas. If the Suppliers' Code of Ethics differs from current legislation, the applicable laws take precedence and must be applied in the country concerned.

We do business with suppliers who agree to comply with the requirements of the Suppliers' Code of Ethics and the principles set out in the International Labour Organization Conventions, the Universal Declaration of Human Rights, the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, and the United Nations Women's Empowerment Principles.

Our suppliers shall make the best efforts towards the SEQENS Group to ensure that their subcontractors and suppliers comply with this Suppliers' Code of Ethics.

If the Suppliers' Code of Ethics is breached by one of its suppliers or by a supplier or subcontractor thereof, SEQENS reserves the right to review and potentially terminate the commercial relationship, unilaterally and without any compensation, despite its duration, the existence of any other contractual provision that would be applicable thereto and without prejudice to any other rights of Companies in the SEQENS group, or any appeal they may exercise.

I. Labor policy

The Group protects its employees by complying with applicable local regulations and international standards, including those established by the International Labour Organization, particularly with regard to occupational health and safety, social security, working hours and conditions, regular fair compensation, non-discrimination and the exercise of freedom of association. It expects the same from its suppliers.

The following requirements, aligned with the International Labour Organization conventions (ILO), are applicable to all suppliers:

- **No child labor:** Suppliers must not provide employment to children before they have completed their compulsory education and in any event not before they reach the age of 15 (fifteen).
- **No forced labor or “compulsory labor”:** According to the Forced Labor Convention (No. 29), any work or service which is exacted from any person under the menace of any penalty and for which said person has not offered himself or herself voluntarily.
- **Freedom of association and collective bargaining:** All workers must be allowed to exercise their rights to freedom of association and collective bargaining.
- **Working hours:** SEQENS expects all suppliers to respect all working time legislation in the countries in which they do business.
- **Fair wages:** Suppliers must pay fair wages which meet, at a minimum, legal standards or applicable national norms.
- **Occupational health & safety including mental health:** SEQENS expects all suppliers to provide all of their employees and workers with a safe and healthy workplace.
- **Diversity & inclusion including harassment and discrimination:** SEQENS expects its suppliers to treat all their employees with respect and dignity. Diversity in the workplace is respected. All forms of harassment and discrimination in the workplace, whether in the recruitment process, upon hiring, during or at the end of the employment relationship, are prohibited.

Suppliers are expected to recruit, employ and promote employees on the sole basis of the qualifications and abilities needed for the work to be performed, without regard to race, age, gender, national origin, religion or any other category not relevant to performance.

II. Respect for the environment

In addition to strict compliance with local environmental regulations, the SEQENS Group aims to achieve the best available standards in terms of environmental impact in its activities. It has set up regular monitoring at all of its production sites in order to maintain sustainable and environmentally friendly activity. Environmental protection is a fundamental component of the CSR (Corporate Social Responsibility) policy implemented by the Group. In this respect, the Group has already made strong commitments to reduce its greenhouse gas emissions and has invested in structuring projects in all of its activities.

SEQENS expects all its suppliers to observe the following environmental management principles:

- Strictly complying with local environmental laws and regulations;
- Assessing and managing risks associated to environmental impact;
- Following, investigating and taking corrective and preventive actions in case of environment incidents;
- Measuring, monitoring and continuously improving environment performance, including greenhouse gas emissions, energy, resources, water, effluents, waste and air emissions (VOC, NOx, SOx, etc.).
- Monitor operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high conservation value to manage impacts on biodiversity.



III. Professional Integrity Requirements

We require our suppliers to conduct their business with integrity in an exemplary manner.

- ✦ **Legal requirements:** we expect our suppliers to act in full compliance with local, national and international laws applicable to conducting their business.
- ✦ **Prohibition of all forms of corruption:** the SEQENS Group has a simple and clear position: a “zero tolerance” approach towards any corrupt act and influence peddling.
- ✦ **Prevention of conflicts of interest:** we require our suppliers to have a system in place to prevent conflicts of interest, in particular as part of their collaboration with the SEQENS Group.
- ✦ **Prohibition of “facilitation payments”:** the SEQENS Group’s position is simple and clear: zero tolerance for payments for administrative acts (also known as “facilitation payments”), bribery or favoritism.
- ✦ **Choice of first-tier partners and intermediaries:** the Group aims to maintain fair business relationships that are consistent with its values and promote ethical business practices. As suppliers to SEQENS, you must ensure that the selection of your first-tier partners is made based on objective criteria (quality and cost of the service in relation to the market price and business ethics profile) and that they are reviewed fairly.
- ✦ **Relations with public authorities:** the SEQENS Group is committed to maintaining a constructive, transparent and responsible dialogue with public authorities by providing and exchanging relevant, consistent, conclusive and accurate information. We expect the same behavior from our suppliers.
- ✦ **Prohibition of money laundering and terrorist financing:** money laundering is the process of concealing the nature and origin of money derived from illicit activities (drug trafficking, arms trafficking, human trafficking, etc.) by incorporating this “dirty” money into legal activities. Terrorist financing is the act of providing or raising funds by any means, directly or indirectly, with the intent that they are used or in the knowledge that they will be used in terrorist activities. We expect our suppliers to take all appropriate measures to prevent their operations from being used as a vehicle for money laundering.
- ✦ **Respect for competition:** the SEQENS Group strictly respects the rules of local, national, and international competition and adopts a fair and constructive approach to the market. It therefore rejects any action that could falsify or distort free competition or market access or violate the applicable legal rules on competition law. We expect our suppliers to comply with applicable competition laws in the countries in which they operate. This covers the prohibition of abuse of dominant position and unlawful agreements between competitors.

- **Confidentiality:** our suppliers must undertake to take all necessary measures to guarantee the confidentiality of trade secrets and other non-public information shared as part of their business relationship with the SEQENS Group.
- **Prevention of insider trading:** our suppliers must comply with current laws on insider trading and refrain from selling or buying, directly or indirectly, securities of any of the companies in the SEQENS Group based on inside information.
- **Personal data protection:** The SEQENS Group is committed to processing personal data in accordance with applicable regulations, including the European General Data Protection Regulation (GDPR) and to ensuring that the rights of all data subjects are respected. We require our suppliers to comply with applicable laws and regulations regarding the protection of personal data.
- **International trade restrictions and sanctions:** we require our suppliers to comply with international trade restrictions and sanctions, taking their development into account, as well as export control laws and regulations.
- **Gifts and hospitality:** gifts and hospitality embellish business relationships according to customs that are more or less prevalent, depending on the country. However, the abuse of these practices is universally considered to increase the risk of corruption for which the Group has a “zero tolerance” policy. It is therefore necessary to remain within reasonable limits as to the value of the gifts and any form of hospitality offered and received.
- **Protection of assets:** our suppliers must take all necessary measures to protect the resources and assets of the SEQENS Group, including its intellectual property rights.

IV. Inspection and audit

Inspection: we reserve the right to verify compliance with these principles and conduct compliance audits with our suppliers and their own suppliers and subcontractors. Our suppliers must provide all necessary information and facilitate access to representatives of SEQENS Group Companies seeking to verify compliance with the requirements of this Code. Our suppliers must undertake to improve or correct any shortcomings detected. SEQENS Group Companies may also assist their suppliers in the implementation and application of best practices in order to resolve minor cases of non-compliance. **Accuracy of records and access to information:** our suppliers must maintain sufficient records to prove compliance with the Suppliers' Code of Ethics. They must provide our representatives with complete, authentic and accurate records.

Date:

Signature:

Name and address of the supplier:

Name and position of the signatory who, by signing, confirms that he/she has the authority and capacity to bind the supplier:



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